



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
INVESTMENT MANAGEMENT

April 18, 2012

VIA U.S. MAIL

Mark D. Perlow, Esq.
K&L Gates LLP
Four Embarcadero Center
Suite 1200
San Francisco, CA 94111

Re: Mathews International Capital Management, LLC, et al., File No. 812-13817

Dear Mr. Perlow:

By Form APP-WD filed with the Securities and Exchange Commission on April 18, 2012, you requested that the above-referenced application, filed under the Investment Company Act of 1940, be withdrawn. Please be advised that your request for withdrawal has been granted, pursuant to delegated authority.

Sincerely,

A handwritten signature in blue ink, appearing to read "Janet M. Grossnickle".

Janet M. Grossnickle
Assistant Director
Office of Investment Company Regulation

cc: Kurt J. Decko, Esq.
K&L Gates LLP

Timothy B. Parker, Esq.
Mathews International Capital Management, LLC
Four Embarcadero Center
Suite 550
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