

STATE OF COLORADO

**Division of Securities
Department of Regulatory Agencies**

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Securities Commissioner



Bill Ritter, Jr.
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Executive Director

August 15, 2008

Michael J. Bilan, Esq.
Law Offices of Edward T. Swanson
1158 26th St, #326
Santa Monica, California 90403

**Re: Infrared Systems International Stock Dividend
Our File No. B-006-001**

Dear Mr. Bilan:

We are in receipt of your letter dated July 9, 2008, in connection with the above referenced matter. On behalf of Infrared Systems International ("ISI"), which is a wholly owned subsidiary of China Sxan Biotech, Inc. ("CSBI"), you have requested the position of the staff of the Colorado Division of Securities ("Staff") regarding the proposed distribution ("Distribution") of a stock dividend by CSBI to its shareholders of all of the issued shares of common stock of ISI, for which such shareholders will pay no consideration. CSBI and ISI specifically request, in connection with the Distribution, that the Securities Commissioner issue a discretionary exemption for the transaction. Alternatively, CSBI requests the Staff issue a no-action position relative to these issues.

Based on the facts in your letter, we understand that CSBI entered into a Share Purchase and Merger Agreement pursuant to which CSBI entered into a reverse merger with Advance Technologies, Inc ("AVTX"). This agreement contemplated that all of the current assets and liabilities of CSBI would be assigned to ISI, which at that time was a wholly-owned subsidiary of AVTX. Further, after registration of the Shares with the SEC, the stock of ISI would be distributed to the common stockholders of CSBI.

CSBI has further represented that a registration statement on Form S-1 has been filed with the SEC covering the Shares to be distributed pursuant to the stock dividend. No

consideration will be paid for the Shares by recipients of the stock dividend and no rights will be surrendered or relinquished; and the distribution will be pro rata based on the CSBI shareholder's ownership of CSBI shares. After the completion of the proposed stock dividend, ISI will become a publicly-held corporation whose stock will be registered under the Securities Exchange Act of 1934.

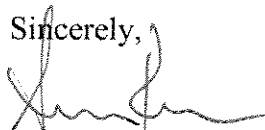
The Staff cannot confirm that the Distribution will not involve an "offer" or "sale" of a security under the Act because the Distribution is not for "value." See, §§ 11-51-201(13)(d), (e), (f), and (g).

While the Staff cannot confirm the Distribution does not involve an "offer" or "sale" of a security under the Colorado Securities Act, in light of the facts represented, the Staff will not recommend that formal enforcement proceeding be initiated against CBSI or ISI, for violation of the registration or licensing provisions of the Act relative to the Distribution.

It should be noted that by this letter, the Staff only expresses its position as to the recommendation of formal enforcement proceedings under the Colorado Securities Act and does not purport to express any formal opinion or conclusion. Also, it should be noted that the position taken is done so based on the facts and representations in your letter. Any change in those facts or circumstances described might require a different response.

If there are any questions, please contact the undersigned.

Sincerely,



Gerald Rome

Deputy Securities Commissioner