May 29, 2009

Securities and Exchange Commission Division of Corporation Finance 100 F Street, N.E. Washington, DC 20549

Re: BioSante Pharmaceuticals, Inc.

Post-Effective Amendment No. 1 to Registration Statement on Form S-3 (File No. 333-156276) Application for Withdrawal Pursuant to Rule 477

Ladies and Gentlemen:

Pursuant to Rule 477 of the Securities Act of 1933, as amended (the "<u>Securities Act</u>"), BioSante Pharmaceuticals, Inc. (the "<u>Company</u>") hereby requests that the Securities and Exchange Commission (the "<u>Commission</u>") consent to the withdrawal, effective as of the date hereof or at the earliest practicable date hereafter, of the Company's Post-Effective Amendment No. 1 to Registration Statement on Form S-3, File No. 333-156276 (collectively, the "<u>Post-Effective Amendment</u>"), as filed with the Commission on March 27, 2009.

The Company has determined to file a new post-effective amendment to the Company's Registration Statement on Form S-3 on a Form S-1 instead of Form S-3. The Company confirms that the Post-Effective Amendment was not declared effective by the Commission, and no securities of the Company have been sold pursuant to the Post-Effective Amendment.

Upon grant of the Commission's consent, please provide a facsimile copy of the written order consenting to the withdrawal of the Post-Effective Amendment to the undersigned, facsimile number (847) 478-9260, with a copy to the Company's legal counsel, Oppenheimer Wolff & Donnelly, LLP, attention: Amy E. Culbert, Esq., Plaza VII, Suite 3300, 45 South Seventh Street, Minneapolis, MN 55402-1609, facsimile number (612) 607-7100.

If you have any questions with respect to this matter, please contact our securities counsel, Ms. Culbert at (612) 607-7287.

Sincerely,

BIOSANTE PHARMACEUTICALS, INC.

By: /s/ Stephen M. Simes
Stephen M. Simes

President and Chief Executive Officer

cc: Phillip B. Donenberg, BioSante Pharmaceuticals, Inc. Amy E. Culbert, Esq., Oppenheimer Wolff & Donnelly LLP