



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3561

November 9, 2009

Via U.S. Mail and Facsimile

Berth H. Milton  
Chief Executive Officer  
Private Media Group, Inc.  
Calle de la Marina 14-16  
Floor 18, Suite D, 08005  
Barcelona, SPAIN

**Re: Private Media Group, Inc.**  
**Form 10-K for the fiscal year ended December 31, 2008**  
**Filed April 15, 2009**  
**File No. 000-25067**

Dear Mr. Milton:

We have completed our review of your Form 10-K and have no further comments at this time.

Sincerely,

Amanda Ravitz  
Branch Chief – Legal