



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

Mail Stop 3030

May 19, 2009

Via U S Mail and FAX [ (713) 465-1080 ]

Frank Neukomm, Chief Executive Officer  
American Security Resources Corporation  
19 Briar Hollow Lane, Suite 125  
Houston, Texas 77027

**Re: American Security Resources Corporation  
Form 8-K for Item 4.01  
Filed May 18, 2009  
File No. 000-27419**

Dear Mr. Neukomm:

We have reviewed your filing and have the following comments. Where indicated, we think you should revise your document in response to these comments. If you disagree, we will consider your explanation as to why our comments are inapplicable or a revision is unnecessary. After reviewing this information, we may raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comments or any other aspect of our review. Feel free to call the applicable staff person at the telephone number listed at the end of this letter.

Mr. Frank Neukomm  
American Security Resources Corporation  
May 19, 2009  
Page 2 of 3

Form 8-K Filed May 18, 2009

1. In an amendment, please expand to present all applicable disclosures required by Item 304 of Regulation S-K. Please clarify the periods audited and/or reviewed by Mr. Thomas per Item 304(a)(1), and whether he issued an audit report on any period. State whether or not there were any disagreements as in Item 304(a)(1)(iv). Clarify whether any of the events listed in Item 304 (a)(1)(v) occurred.
2. Include the accountant's letter from Mr. Thomas in Exhibit 16 stating his agreement or disagreement with the disclosures made in the amended 8-K, as required by Item 304(a)(3) of Regulation S-K.

Please file your response and amendment via EDGAR in response to these comments within 5 business days after the date of this letter. Please contact the staff immediately if you require longer than 5 business days to respond.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing reviewed by the staff to be certain that they have provided all information investors require for an informed decision. Since the registrant and its management are in possession of all facts relating to a registrant's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In connection with responding to our comments, please provide, in writing, a statement from the registrant acknowledging that:

- the registrant is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filing; and
- the registrant may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

Mr. Frank Neukomm  
American Security Resources Corporation  
May 19, 2009  
Page 3 of 3

In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filing or in response to our comments on your filing.

If you have any questions, please call me at (202) 551-3606. In my absence, you may call Brian Cascio, Branch Chief at (202) 551-3676.

Sincerely,

Jeanne Bennett  
Staff Accountant