

Mail Stop 4561

July 18, 2006

George Lichter  
Chief Executive Officer  
InfoSearch Media, Inc.  
4086 Del Rey Avenue  
Marina Del Rey, CA 90292

**Re: InfoSearch Media, Inc.  
Amendment No. 8 to Form SB-2  
Filed on July 12, 2006  
File No. 333-130173**

Dear Mr. Lichter:

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 comment is inapplicable or a revision is unnecessary. Please be as detailed as necessary in your explanation. In some of our comments, we may ask you to provide us with supplemental information so we may better understand your disclosure. After reviewing this information, we may or may not 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 us at the telephone numbers listed at the end of this letter.

Employment Agreements, page 38

1. We note your response to comment 10. Please revise your disclosure to note that there is no termination date with respect to the offer letters.

Financial Statements

Note 10 – Acquisition of Answerbag

2. We have reviewed your response to comment 14. You are currently not in compliance with SFAS 141 as you have not determined the values and lives of your intangible assets acquired with the Answerbag Acquisition. As soon as your independent, third-party valuation has been completed please provide all of the disclosures required by SFAS 141 in your next amendment. The types of intangibles that you have identified in almost all instances do not have indefinite lives.

Exhibit 5.1- Legal Opinion

3. Please revise the last paragraph to eliminate the limitation on reliance on the opinion. Investors must be able to rely on the legal opinion.

As appropriate, please amend your registration statement in response to these comments. You may wish to provide us with marked copies of the amendment to expedite our review. Please understand that we may have additional comments after reviewing your amendment and responses to our comments.

We will consider a written request for acceleration of the effective date of the registration statement as a confirmation of the fact that those requesting acceleration are aware of their respective responsibilities under the Securities Act of 1933 and the Securities Exchange Act of 1934 as they relate to the proposed public offering of the securities specified in the above registration statement. We will act on the request and, pursuant to delegated authority, grant acceleration of the effective date.

We direct your attention to Rules 460 and 461 regarding requesting acceleration of a registration statement. Please allow adequate time after the filing of any amendment for further review before submitting a request for acceleration. Please provide this request at least two business days in advance of the requested effective date.

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You may contact Jamie Webster, Accountant, at (202) 551-3446 or Dan Gordon, Accounting Branch Chief, at (202) 551-3486 if you have questions regarding comments on the financial statements and related matters. Please contact David Roberts, Staff Attorney, at (202) 551-3856 or the undersigned at (202) 551-3780 with any other questions.

Sincerely,

Karen J. Garnett  
Assistant Director

cc: Louis Zehil, Esq. (*via facsimile*)