



DIVISION OF  
CORPORATION FINANCE

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

October 1, 2013

Via E-mail

Mr. James McKinney  
Chief Executive Officer and Chief Financial Officer  
Vital Products, Inc.  
2404 Via Mariposa West, 1-A  
Laguna Woods, California 92637

**RE: Vital Products, Inc.**  
**Form 10-K for the Year Ended July 31, 2012**  
**Filed November 2, 2012**  
**File No. 333-127915**

Dear Mr. McKinney:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company 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. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Terence O'Brien

Terence O'Brien  
Accounting Branch Chief