

Mail Stop 3561

December 15, 2009

Ms. Diane S. Button  
Chief Executive Officer  
Cactus Ventures, Inc.  
251 Jeanell Dr.,  
Suite 3  
Carson City, NV 89703

**Re: Cactus Ventures, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2008**  
**Filed February 20, 2009**  
**Form 10-Q for Quarter Ended March 31, 2009**  
**Filed May 13, 2009**  
**Form 10-Q for Quarter Ended June 30, 2009**  
**Filed August 11, 2009**  
**Form 10-Q for Quarter Ended September 30, 2009**  
**Filed November 12, 2009**  
**File No. 000-52446**

Dear Ms. Button:

We issued comments to you on the above captioned filing(s) on November 13, 2009. As of the date of this letter, these comments remain outstanding and unresolved. We expect you to contact us by December 30, 2009 to provide a substantive response to these comments or to advise us why you are unable to respond and when you will be able to do so.

If you do not respond to the outstanding comments or contact us by December 30, 2009, we will, consistent with our obligations under the federal securities laws, decide how we will seek to resolve material outstanding comments and complete our review of your filings and your disclosure. Among other things, we may decide to release publicly, through the agency's EDGAR system, all correspondence, including this letter, relating to the review of your filing(s), consistent with the staff's decision to release publicly comment letters and response letters relating to disclosure filings it has reviewed. You can find more information about the staff's decision to release filing correspondence at <http://www.sec.gov/news/press/2004-89.htm> and <http://www.sec.gov/news/press/2005-72.htm>

Ms. Diane S. Button  
Cactus Ventures, Inc.  
December 15, 2009  
Page 2

You may contact Raj Rajan, Senior Staff Accountant, at 202-551-3388 or Brian K. Bhandari, Branch Chief, at 202-551-3390 if you have questions

Sincerely,

Tia Jenkins  
Senior Assistant Chief Accountant  
Office of Beverages, Apparel and  
Health Care Services