



DIVISION OF  
CORPORATION FINANCE

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

October 27, 2014

Via E-mail

Mr. Roy G. Warren  
President and Chief Executive Officer  
Attitude Drinks Incorporated  
712 U.S. Highway 1, Suite 200  
North Palm Beach, Florida 33408

**Re: Attitude Drinks Incorporated  
Form 8-K  
Filed August 21, 2014  
File No. 000-52904**

Dear Mr. Warren:

We have completed our review of your filing. 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 filing 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 filing to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Brian V. McAllister

Brian McAllister  
Staff Accountant  
Office of Beverages, Apparel, and  
Mining