



DIVISION OF
CORPORATION FINANCE

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

January 31, 2012

Via E-mail

Wright W. Thurston
Chairman of the Board of Directors and Chief Executive Officer
Elevate, Inc.
180 Avenida La Pata, Suite 200
San Clemente, CA 92673

Re: Elevate, Inc.
Form 10-K for the fiscal year ended May 31, 2011
Filed September 20, 2011
File No. 001-34642

Dear Mr. Thurston:

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 filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Craig D. Wilson

Craig D. Wilson
Sr. Assistant Chief Accountant