



DIVISION OF  
CORPORATION FINANCE

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

November 10, 2020

Dennis Knocke  
President and Chief Executive Officer  
Nerium Biotechnology Inc.  
11467 Huebner Road  
Suite 175  
San Antonio, TX

**Re: Nerium Biotechnology Inc.**  
**Registration Statement on Form 10-12G**  
**Filed June 16, 2020**  
**File No. 000-54051**

Dear Mr. Knocke:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Life Sciences

cc: Arnold Zipper, Esq.