



DIVISION OF  
CORPORATION FINANCE

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

November 18, 2013

Via E-mail

Mr. Sanford Lang  
Chief Executive Officer  
Insynergy Products, Inc.  
4705 Laurel Canyon Blvd. Suite 205  
Studio City, CA 91607

**Re: Insynergy Products, Inc.**  
**Form 10-K for the year ended December 31, 2012**  
**Filed March 20, 2013**  
**File No. 0-54892**

Dear Mr. Lang:

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/ Robert S. Littlepage for

Larry Spigel  
Assistant Director

Cc: Martin Goldrod, Chief Financial Officer