



DIVISION OF  
CORPORATION FINANCE

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

December 26, 2018

David Briskie  
Chief Financial Officer  
Youngevity International, Inc.  
2400 Boswell Road  
Chula Vista, California 91914

**Re: Youngevity International, Inc.**  
**Registration Statement on Form S-3**  
**Filed December 21, 2018**  
**File No. 333-228983**

Dear Mr. Briskie:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Charlie Guidry at 202-551-3621 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Consumer Products