

Mail Stop 3561

December 2, 2008

American Vanguard Corporation  
James A. Barry-Chief Financial Officer  
4695 MacArthur Court  
Newport Beach, California

**Re: American Vanguard Corporation**  
**Form 10-K for the year ended December 31, 2007**  
**Filed March 17, 2008**  
**File Number: 001-13795**

Dear Mr. Barry:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

David R. Humphrey  
Branch Chief