

Via Facsimile and U.S. Mail
Mail Stop 6010

November 13, 2008

Mr. Adam M. Michelin
Naturade, Inc.
2099 S. State College Blvd., Suite 210
Anaheim, CA 92806

**Re: Naturade, Inc.
Form 10-K for the Fiscal Year Ended December 31, 2007
File No. 033-07106-A**

Dear Mr. Michelin:

We issued comments to you on the above captioned filing on August 25, 2008. As of the date of this letter, these comments remain outstanding and unresolved. We expect you to contact us by November 28, 2008 to provide a substantive response to these comments or to advise us why you are unable to respond and when you will be able to do so.

If you do not respond to the outstanding comments or contact us by November 28, 2008, we will, consistent with our obligations under the federal securities laws, decide how we will seek to resolve material outstanding comments and complete our review of your filings and your disclosure. Among other things, we may decide to release publicly, through the agency's EDGAR system, all correspondence, including this letter, relating to the review of your filing, consistent with the staff's decision to release publicly comment letters and response letters relating to disclosure filings it has reviewed. You can find more information about the staff's decision to release filing correspondence at <http://www.sec.gov/news/press/2004-89.htm> and <http://www.sec.gov/news/press/2005-72.htm>.

If you have any questions, please contact Mark Brunhofer, Senior Staff Accountant, at (202) 551-3638. In this regard, do not hesitate to contact me, at (202) 551-3387.

Sincerely,

Carlton E. Tartar
Branch Chief

cc: Mr. Rick Robinette