



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

DIVISION OF  
CORPORATION FINANCE

December 20, 2013

Via E-Mail

Mr. Bernard L. Kasten Jr., M.D.  
Chief Executive Officer and Interim Chief Financial Officer  
GeneLink, Inc.  
8250 Exchange Drive, Suite 120  
Orlando, Florida 32809

**Re: GeneLink, Inc.**  
**Form 10-K for the Year Ended December 31, 2012**  
**Filed April 1, 2013**  
**Form 10-Q for the Quarter Ended March 31, 2013**  
**Filed May 15, 2013**  
**File No. 000-30518**

Dear Mr. Kasten:

We have completed our review of your filings. 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 filings 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 filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Linda Cvrkel

Linda Cvrkel  
Branch Chief