



DIVISION OF
CORPORATION FINANCE
MAIL STOP 7010

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-7010

December 17, 2008

Steve Weinberger
Chief Financial Officer
The Inventure Group, Inc.
5050 N. 40th St., Suite #300
Phoenix, AZ 85018

Re: The Inventure Group, Inc.
Form 10-K for the Fiscal Year Ended December 29, 2007
Filed March 28, 2008
File No. 1-14556

Dear Mr. Weinberger:

We have completed our review of your 2007 Form 10-K, and do not, at this time, have any further comments.

Sincerely,

Jill S. Davis
Branch Chief