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ADVANCED LIFE SCIENCES

Advancing Discoveries For Health

June 28, 2016

Brent J. Fields
Secretary
United States Securities and Exchange Commission
Office of the Secretary
100 F Street NE
Washington, D.C. 20549

Dear Mr. Fields:

We have received the communication from the SEC entitled "In the Matter of Advanced Life Sciences Holdings, Inc., et al. - Order Instituting Administrative Proceedings and Notice of Hearing Pursuant to Section 12(j) of the Securities Exchange Act of 1934" (File No. 3-17293) and dated June 15th, 2016.

The purpose of this document is to answer the allegations contained in this Order.

Advanced Life Sciences Holdings, Inc. ("ADLS") is a Delaware corporation located in Woodridge, IL and is a biopharmaceutical company focused on the discovery, development and commercialization of novel drugs in the area of infectious disease.

We have been developing our antibiotic cethromycin through clinical trials for the treatment of a variety of dangerous infections, especially those caused by pathogenic bacteria that are resistant to other antibiotics.

In late 2008, we completed our Phase 3 clinical trials of cethromycin against pneumonia and, in 2009, we submitted our New Drug Application to the FDA for their review. Later that year, the FDA convened an advisory committee meeting to review our NDA and provide recommendations regarding the safety and efficacy of cethromycin to the agency. The advisory committee voted overwhelming in favor of the safety of the drug. However, with regard to drug efficacy, the advisory committee asked us to go back and redo clinical trials according to guidelines the FDA had put in place even after our clinical trials had been completed.

Thus, even though we met the efficacy goals of the Phase 3 clinical trials we had designed and agreed to with the FDA in 2005, we were asked to design and carry out new trials under the new FDA guidelines.

Because of this setback, our stock price plummeted into penny stock range in 2009. Although we worked diligently to design a new clinical trial that would meet the new FDA guidelines, it took us almost a year to reach agreement with the FDA on what the specifications would be for the new clinical trial. As we reached the end of 2010, it became extremely difficult to raise additional capital to continue to fund our clinical program.

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In late April, 2011, because of our lack of liquidity, we were forced to put the Company into suspension and terminate every employee on our staff. Our last filing with the SEC was our 10K document for 2010. We were just about ready to file our 10Q for the first quarter of 2011 during the late April, 2011 timeframe when we put the Company in suspension. That filing was not made.

We spent the next two years, without any cash compensation from ADLS, attempting to restructure a bank note which, on top of the clinical program uncertainty, was inhibiting our ability to move the Company forward. In May of 2013, we successfully reached an agreement with the bank which finally made it possible to begin to rebuild ADLS.

From that point in time until present, again without any cash compensation from ADLS, we have been working to assemble a filing to the SEC to move ADLS closer to compliance. During the course of that time, we have had several discussions with staff professionals at the SEC regarding the nature of the document we should file at this point.

We were advised to prepare a comprehensive 10K document covering the years 2011 through the present. Over the past couple of years, we have worked to prepare that document. The progress to complete this filing has been slow due to the part time involvement of the legal and accounting professionals that we have worked with on this project, along with the complex and time-consuming nature of the task.

We continued to press on, however, because of our firm belief that our antibiotic cethromycin would be of great benefit to the world with its ability to overcome the drug resistance that has been building globally to "superbugs".

Although our management team is not being compensated, we meet regularly and discuss strategies for moving our program forward. We are in regular contact with our board of directors and have designed a plan for moving ADLS forward. In addition, we have been in communication with the FDA and have met with agency representatives to learn what ADLS will need to do to receive approval for cethromycin. We believe that, once we bring ADLS back into compliance with SEC regulations, Company shareholders will realize value in their investment, while we deliver an important new drug to patients who are in need of cethromycin.

We respectfully request, then, that the SEC allow us to file the comprehensive 10K document we have prepared shortly after the submission of our answer to this Order. It is a document that would bring investors up to date on the current status of the Company. Maintaining our registration status would allow us to position ADLS to raise the additional capital required to carry out the clinical trials that the FDA has asked us to conduct in order to achieve regulatory approval and commercialization of what can be a life-saving antibiotic. We would greatly appreciate the opportunity to help make that happen.

Sincerely,

Michael T. Flavin, Ph.D.
Chief Executive Officer