

DAVIS & ASSOCIATES
(A PROFESSIONAL LAW CORPORATION)
-SECURITIES, BUSINESS & INTERNATIONAL LAWYERS-

LOS ANGELES
BEACH
Ritz Carlton Annex
Bay Club Annex
(310) 823-8300/fax (310) 301-3370
Don@securities-attys.com

NEWPORT
Balboa

Respond To:
P.O. Box 12009
Marina Del Rey, CA
90295-3009

June 1, 2012

Mr. Ajay Koduri
Staff Attorney
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Insynergy Products, Inc.
Amendment No. 3 to Registration Statement on Form S-1
Filed January 31, 2012 and amended April 17, 2012 and
May 24, 2012
File No. 333-179262

Dear Mr. Koduri,

I am responding on behalf of Insynergy Products, Inc. (formerly Insynergy Inc.) (the "Company") to your letter of comments dated June 1, 2012. Amendment No 4 to the registration statement has just been filed. Attached is a copy of that document, marked to show changes.

The paragraph numbers set forth below match the numbered paragraphs in your letter with our response set out below each comment.

1. Complied with

2. The disclosure on pages 41 has been removed as these loans are not to a related party. Thus, this comment has been complied with.

If you desire more information or have questions, please contact me direct on my cell phone at 213 400 2007.

The Company would like to have the registration statement declared effective as soon as practical. If the above changes are satisfactory, perhaps you could email or telephone your verbal clearance, and the Company could then immediately file its completed registration statement.

We appreciate your assistance in this matter.

Very Truly Yours,

/s/

Donald G. Davis