



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

DIVISION OF  
CORPORATION FINANCE

May 2, 2011

Mr. Geoffrey Jervis  
Secretary  
Capital Trust, Inc.  
410 Park Avenue, 14th Floor  
New York, NY 10022

**Re: Capital Trust, Inc.  
Preliminary Proxy Statement on Schedule 14A  
Filed April 22, 2011  
File No. 001-14788**

Dear Mr. Jervis:

We have completed our review of your filing and do not have any further comments at this time.

Sincerely,

Kristina Aberg  
Attorney-Advisor

cc: Michael L. Zuppone, Esq.  
Paul, Hastings, Janofsky & Walker LLP