



DIVISION OF  
CORPORATION FINANCE

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

February 8, 2013

Via E-mail

Mr. Geoffrey G. Jervis  
Chief Financial Officer  
Capital Trust Inc.  
410 Park Avenue, 14th Floor  
New York, NY 10022

**Re: Capital Trust Inc.  
Form 10-K for Fiscal Year Ended December 31, 2011  
Filed February 14, 2012  
Form 10-Q for Fiscal Quarter Ended September 30, 2012  
Filed November 14, 2012  
File No. 001-14788**

Dear Mr. Jervis:

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

Sincerely,

/s/ Daniel L. Gordon

Daniel L. Gordon  
Branch Chief