

Mail Stop 4561

November 17, 2008

VIA USMAIL and FAX (714) 667 - 6860

Ms. Shannon K S Johnson  
Chief Financial Officer  
Grubb & Ellis Apartment REIT, Inc.  
1551 N. Tustin Avenue, Suite 300  
Santa Ana, California 92705

**Re: Grubb & Ellis Apartment REIT, Inc.  
Form 10-K for the year ended December 31, 2007  
Filed on March 28, 2008  
File No. 000-52612**

Dear Ms. Shannon K S Johnson:

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

Sincerely,

Cicely LaMothe  
Branch Chief