

Mail Stop 4561

June 7, 2007

Robert J. Werra
2800 N Dallas Pkwy #100
Plano, TX 75093-5994

**Re: American Republic Realty Fund I
Form 10-K for Fiscal Year Ended December 31, 2006
Form 10-Q for Quarter Ended March 31, 2007
File No. 000-11578**

Dear Mr. Werra:

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

You may contact Yolanda Crittendon, Staff Accountant, at (202) 551-3472 or the undersigned at (202) 551-3413 if you have questions.

Sincerely,

Cicely LaMothe
Accounting Branch Chief