

May 22, 2009

Mail Stop 4561

Mr. Richard A. Schweinhart  
Executive Vice President and Chief Financial Officer  
Ventas, Inc.  
111 South Wacker Drive  
Suite 4800  
Chicago, IL 60606

**Re: Ventas, Inc.  
Form 10-K for the year ended December 31, 2008  
Filed February 27, 2009  
File No. 001-10989**

**ElderTrust Operating Limited Partnership  
Form 10-K for the year ended December 31, 2008  
Filed March 31, 2009  
File No. 333-89312-02**

Dear Mr. Schweinhart:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments. Regarding the response to comment 5 in your letter dated May 14, 2009, we have no further comment based upon the materiality of the redemption obligation.

Sincerely,

Linda van Doorn  
Senior Assistant Chief Accountant