

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

DIVISION OF CORPORATION FINANCE

July 15, 2013

<u>Via E-Mail</u> Mr. Richard A. Schweinhart Executive Vice President and Chief Financial Officer Ventas, Inc. 353 N. Clark Street, Suite 3300 Chicago, IL

> Re: Ventas, Inc. Form 10-K for the Fiscal Year Ended December 31, 2012 Filed February 19, 2013 File No. 001-10989

Dear Mr. Schweinhart:

We have reviewed your filing and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter within ten business days by amending your filing, by providing the requested information, or by advising us when you will provide the requested response. If you do not believe our comments apply to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your filing and the information you provide in response to these comments, we may have additional comments.

## Form 10-K for the Fiscal Year Ended December 31, 2012 filed February 19, 2013

## 2012 Acquisitions, page 99

1. With respect to your 2012 acquisitions, please tell us why you have not disclosed the information required by ASC 805-10-50-2h.

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 Exchange Act rules require. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

Mr. Richard A. Schweinhart Ventas, Inc. July 15, 2013 Page 2

In responding to our comments, please provide a written statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to 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.

If you have any questions, you may contact Jorge L. Bonilla at (202) 551-3414 or me at (202) 551-3486.

Sincerely,

/s/ Daniel L. Gordon

Daniel L. Gordon Branch Chief