



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

DIVISION OF
CORPORATION FINANCE

Mail Stop 3233

August 1, 2017

Via E-mail

Paul L. Beldin

Executive Vice President and Chief Financial Officer

Apartment Investment and Management Company and AIMCO Properties, L.P.

4582 South Ulster Street, Suite 1100

Denver, CO 80237

**Re: Apartment Investment and Management Company
Form 10-K for the Year Ended December 31, 2016
Filed February 24, 2017
Form 8-K
Filed February 2, 2017
File No. 1-13232**

Dear Mr. Beldin:

We have completed our review of your filings. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ Shannon Sobotka

Shannon Sobotka
Staff Accountant
Office of Real Estate
& Commodities