



DIVISION OF  
CORPORATION FINANCE

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

December 12, 2012

Via E-Mail

Billy M. Dodson

President

Ministry Partners Investment Company, LLC

915 West Imperial Highway, Suite 120

Brea, CA 92821

**Re: Ministry Partners Investment Company, LLC  
Registration Statement on Form S-1  
Filed June 24, 2011  
File No. 333-175144  
Form 10-K for the Fiscal Year ended December 31, 2011  
Filed March 30, 2012  
Form 10-K for the Fiscal Year ended December 31, 2010  
Filed March 31, 2011  
File No. 333-04028-LA**

Dear Mr. Dodson:

We completed our review of your filings on October 11, 2012. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings 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. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Michael R. Clampitt

Michael R. Clampitt  
Senior Attorney