

Mail Stop 4561

December 12, 2007

VIA USMAIL and FAX (248) 737 - 9110

Mr. Kenneth R. Howe  
Vice President and Chief Financial Officer  
Agree Realty Corporation  
31850 Northwestern Highway  
Farmington Hills, Michigan 48334

**Re: Agree Realty Corporation**  
**Form 10-K for the year ended 12/31/2006**  
**Filed on 3/14/2007**  
**File No. 001-12928**

Dear Mr. Kenneth R. Howe:

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

Sincerely,

Linda Van Doorn  
Senior Assistant Chief Accountant