

January 19, 2011

Mr. Gene S. Bertcher
Chief Financial Officer
American Realty Investors, Inc.
1800 Valley View Lane, Suite 300
Dallas, Texas 75234

Re: American Realty Investors, Inc.
Form 10-K for the year ended December 31, 2009
Filed on March 31, 2010
File Number 001-15663

Dear Mr. Gene S. Bertcher:

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

Sincerely,

Jessica Barberich
Assistant Chief Accountant