

Mail Stop 4561

October 9, 2008

VIA U.S. MAIL AND FAX (770) 396-0706

Mr. Charles S. Roberts
Chairman, Chief Executive Officer and President
Roberts Realty Investors, Inc.
450 Northridge Parkway, Suite 302
Atlanta, GA 30350

**Re: Roberts Realty Investors, Inc.
Form 10-K for the year ended December 31, 2007
Filed March 31, 2008
File No. 001-13183**

Dear Mr. Roberts:

We have reviewed your filing and have the following comments. Please be as detailed as necessary in your explanations. In our comments, we may ask you to provide us with information so we may better understand your disclosure. After reviewing this information, we may raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comments or any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

Form 10-Q for the Quarterly Period Ended June 30, 2008

4. Notes Payable, page 12

1. Please tell us how you accounted for the loan modifications with Wachovia Bank during April 2008, and whether or not you considered the provisions of EITF 96-19.

Amendment No. 1 to Form 10-Q for the Quarterly Period Ended March 31, 2008

2. Please tell us how you determined it was appropriate to restate your financial statements for the three months ended March 31, 2007 to eliminate depreciation on the Addison Place apartment community, which according to your disclosure, did not become classified as held for sale until January 2008.

* * * *

As appropriate, please respond to these comments within 10 business days or tell us when you will provide us with a response. Please furnish a cover letter with your response that keys your response to our comments and provides any requested information. Detailed cover letters greatly facilitate our review. Please understand that we may have additional comments after reviewing your responses to our comments.

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 all information required under the Securities Exchange Act of 1934 and that they have provided all information investors require for an informed investment decision. 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.

In connection with responding to our comments, please provide, in writing, a 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.

In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filing or in response to our comments on your filing.

Mr. Charles S. Roberts
Roberts Realty Investors, Inc.
October 9, 2008
Page 3

If you have any questions, you may contact Eric McPhee at (202) 551-3693 or me at (202) 551-3486.

Sincerely,

Daniel L. Gordon
Branch Chief