



DIVISION OF  
CORPORATION FINANCE

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

September 30, 2014

Via E-mail

Matias I. Gaivironsky  
Chief Financial Officer  
Alto Palermo S.A. (APSA)  
Moreno 877 22<sup>nd</sup> Floor  
Buenos Aires, Argentina

**Re: Alto Palermo S.A. (APSA)**  
**Form 20-F**  
**Filed on October 31, 2013**  
**File No. 000-30982**

**Alto Palermo S.A. (APSA)**  
**Form 20-F**  
**Filed on October 26, 2012**  
**File No. 000-30982**

Dear Mr. Gaivironsky:

We have completed our review of your filings. 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/ Jennifer Monick

Jennifer Monick  
Senior Staff Accountant