

November 19, 2008

Mail Stop 4561

Rocio Revollo  
Chief Financial Officer  
Vestin Mortgage, Inc.  
6149 South Rainbow Blvd  
Las Vegas, NV 89118

**Re: Vestin Fund III, LLC**  
**Form 10-K for the year ended December 31, 2007**  
**Forms 10-Q for the quarters ended March 31, 2008 and June 30, 2008**  
**Filed March 25, 2008; May 12, 2008; and August 14, 2008**  
**File No. 0-51301**

Dear Ms. Revollo:

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

Sincerely,

Daniel L. Gordon  
Branch Chief