

Mail Stop 4561

November 30, 2006

VIA USMAIL and FAX (702) 921-5158

Mr. Jonathan G. Arens  
Chief Financial Officer  
Desert Capital REIT, Inc.  
1291 Galleria Drive, Suite 200  
Henderson, Nevada 89014

**Re: Desert Capital REIT, Inc.  
Form 10-K for the year ended 12/31/2005  
Filed on March 14, 2006  
File No. 000-51344**

Dear Mr. Jonathan G. Arens:

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

Sincerely,

Robert Telewicz  
Senior Staff Accountant