



DIVISION OF  
CORPORATION FINANCE

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

November 3, 2022

Lainie Minnick  
Chief Financial Officer  
Ares Real Estate Income Trust Inc.  
One Tabor Center  
1200 Seventeenth Street, Suite 2900  
Denver, CO 80202

**Re: Ares Real Estate Income Trust Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2021**  
**Filed March 14, 2022**  
**File No. 000-52596**

Dear Lainie Minnick:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance  
Office of Real Estate & Construction

cc: Christopher Stambaugh