



DIVISION OF
CORPORATION FINANCE

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

February 13, 2013

Via E-mail

Steven D. Shackelford
Chief Financial Officer
Global Growth Trust, Inc.
CNL Center at City Commons
450 South Orange Avenue
Orlando, FL 32801

Re: Global Growth Trust, Inc.
Form 10-K for fiscal year ended December 31, 2011
Filed March 14, 2012
File No. 0-54686

Dear Mr. Shackelford:

We have completed our review of your filing. 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 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. 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 the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Jennifer Monick

Jennifer Monick
Senior Staff Accountant