



DIVISION OF  
CORPORATION FINANCE

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

November 13, 2019

Gustav Bahn  
Associate General Counsel  
Steadfast Apartment REIT, Inc.  
18100 Von Karman Avenue, Suite 500  
Irvine, California 92612

**Re: Steadfast Apartment REIT, Inc.**  
**Registration Statement on Form S-4**  
**Filed November 5, 2019**  
**File No. 333-234513**

Dear Mr. Bahn:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Ronald (Ron) Alper at (202) 551-3329 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Real Estate & Construction

cc: Heath Linsky