



DIVISION OF  
CORPORATION FINANCE

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

May 30, 2013

Thomas A. Lewis  
Vice Chairman of the Board of Directors  
Chief Executive Officer  
Realty Income Corporation  
600 La Terraza Boulevard  
Escondido, California 92025-3873

**Re: Realty Income Corporation  
Annual Report on Form 10-K  
Filed February 14, 2013  
File No. 001-13374**

Dear Mr. Lewis:

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 Gowetski

Jennifer Gowetski  
Senior Counsel

cc: William J. Cernius  
Latham & Watkins