



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

DIVISION OF
CORPORATION FINANCE

September 14, 2015

Via E-Mail

David Thompson
Chief Financial Officer
CIM Commercial Trust Corporation
17950 Preston Road, Suite 600
Dallas, TX 75252

Re: CIM Commercial Trust Corporation
Form 10-K for the Fiscal Year Ended December 31, 2014
Filed March 16, 2015
File No. 001-13610

Dear Mr. Thompson:

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/ Jaime G. John

Jaime G. John
Branch Chief