

Mail Stop 4561

December 12, 2007

VIA USMAIL and FAX (248) 737 - 9110

Mr. Kenneth R. Howe
Vice President and Chief Financial Officer
Agree Realty Corporation
31850 Northwestern Highway
Farmington Hills, Michigan 48334

Re: Agree Realty Corporation
Form 10-K for the year ended 12/31/2006
Filed on 3/14/2007
File No. 001-12928

Dear Mr. Kenneth R. Howe:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Linda Van Doorn
Senior Assistant Chief Accountant