



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

DIVISION OF
CORPORATION FINANCE

Mail Stop 3233

January 27, 2017

Via E-mail

Matthew M. Partridge
Chief Financial Officer
Agree Realty Corporation
70 E. Long Lake Road
Bloomfield Hills, Michigan 48304

**Re: Agree Realty Corporation
Form 10-K for Fiscal Year Ended December 31, 2015
Filed March 11, 2016
File No. 001-12928**

Dear Mr. Partridge:

We have completed our review of your filing. 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.

Sincerely,

/s/ Coy Garrison

Coy Garrison
Special Counsel
Office of Real Estate and
Commodities