



DIVISION OF  
CORPORATION FINANCE

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

December 21, 2010

Kalia Weintraub  
Chief Financial Officer  
Ellomay Capital Ltd.  
9 Rothschild Boulevard, 2<sup>nd</sup> Floor  
Tel Aviv 66881, Israel

**Re: Ellomay Capital Ltd.**  
**Form 20-F for the fiscal year ended December 31, 2009**  
**Filed March 10, 2010**  
**File No. 000-26498**

Dear Ms. Weintraub:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Brian R. Cascio  
Accounting Branch Chief