

MAY 28 2013

#16

OFFICE OF INVESTOR
EDUCATION AND ADVOCACY

Kenneth Monroe

May 20, 2012

SEC Complaint Center
100 F Street NE,
Washington, D.C. 20549-0213

RE: File # 81-939
Notice of Application of W2007 Grace Acquisition I. Inc under Section 12 (h) of
the Securities Exchange Act of 1934

Greetings,

I am asking that the SEC deny the request by W2007 Grace Acquisition I to cease filing documents publically.

The most fascinating stretch of data is the statement by W2007 Grace Acquisition I that there are fewer than 300 shareholders of the preferred shares.

The easiest way to skew the data is to use the names of Companies holding the shares in trust, in a multitude of individual accounts, as single shareholders when in fact they represent a much larger population of **individual investors**.

I requested and received a 10 page list of shareholders of record from the company.

I have included this in my letter, but wanted to just give you my quick read of the data.

Charles Schwab holds 497,311 shares in accounts at 6 different addresses. Probably indicating a variety of different portions of the Schwab company. Their retail broker business and Schwab Advisors would be the two biggest pieces of this bucket.

WHAT is not known is the number of INDIVIDUAL investors.

IF every Schwab client account held 1,000 shares in their account, that would lead to **497** separate accounts.

Northern Trust holds 140,551 shares in trust. Using the same 1,000 share per account...**140** separate accounts.

Comerica Bank holds 10,700 shares in trust.. Same math. **10** separate accounts

First Cleaning LLC in St Louis, Mo holds 314,881 shares in client accounts. Same math **314** separate accounts.

J P Morgan Chase holds 164,643 shares in client accounts. Same math **164** separate accounts.

LPL Financial holds 249,955 shares in trust..Same math **249** separate accounts.

MAC & Co in Pittsburgh, PA holds 150,700 shares in trust. Same math **150** separate accounts.

Morgan Stanley holds 122,241 shares in trust. Same math **122** separate accounts.

National Financial Services holds 243,036 shares in trust.. Same math **243** separate accounts.

Pershing LLC holds 340,881 shares in trust..Same math **340** separate accounts.

Bank of NY Mellon, NFS Financial Services, Oppenheimer, Raymond James & Associates, Scottrade, TD Ameritrade, UBS Financial Services, Vanguard Brokerage Services, Wedbush Morgan Securities and Well Fargo collectively hold 371,794 shares in trust. Same math **371** separate accounts.

Collectively, the trustees I have detailed hold in street name 2,606,693 shares of the two classes on preferred shares. Same math, **2,607** separate accounts.

The individual accounts, on average would have to hold 10,000 shares, an initial investment per account of \$ 250,000, to bring the total class to fewer than 300 INDIVIDUAL shareholders.

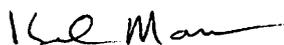
The assumption that individual investors plunked down, on average, \$ 250,000 EACH does not pass the smell test.

Not included in this number are the 2,000,000 million plus shares that affiliates of Goldman Sachs purchased on OTC Pink Sheet market in the past 12 months (speaking about the lack of trading !).

W2007 Grace Acquisition I, Inc and Archon the management company for the 130 hotels that W2007 Grace owns, are currently owned lock, stock and barrel by Goldman Sachs.

The INDIVIDUAL investor needs the clout and support of the SEC to counter the heavy handed campaign that Goldman Sachs has undertaken to subvert our rights.

Respectfully yours



Kenneth Monroe

Shareholder list redacted.