

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

DIVISION OF CORPORATION FINANCE

November 14, 2023

Anastasia Mironova Chief Financial Officer Apollo Commercial Real Estate Finance, Inc. c/o Apollo Global Management, Inc. 9 West 57th Street , 42nd Floor New York , NY 10019

Re: Apollo Commercial Real Estate Finance, Inc. Form 10-K for the year ended December 31, 2022 File No. 001-34452

Dear Anastasia Mironova:

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,

Division of Corporation Finance Office of Real Estate & Construction