

**International Assets Advisory, LLC**  
**390 N. Orange Ave., Suite 750**  
**Orlando, FL 32801**

June 29, 2016

**BY EDGAR AND EMAIL**

Rahul Patel, Staff Attorney  
Securities and Exchange Commission  
100 F Street, N.E., Mail Stop 3561  
Washington, D.C. 20549

Re: CIM Commercial Trust Corporation  
Registration Statement on Form S-11, as amended File No. 333-210880

Dear Mr. Patel:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, the undersigned hereby joins CIM Commercial Trust Corporation in requesting that the effective date of the above-referenced Registration Statement on Form S-11 be accelerated and that such Registration Statement be accelerated so that it will be declared effective at 4:00 PM Eastern Time on July 1, 2016, or as soon thereafter as possible.

Pursuant to Rule 460 of the General Rules and Regulations under the Securities Act of 1933, as amended, please be advised that between April 22, 2016, which was the original filing date of the above-referenced Form S-11 and through the date of this request for acceleration, the undersigned has not distributed to institutions or others any copies of the Preliminary Prospectus dated April 22, 2016.

Very truly yours,

INTERNATIONAL ASSETS ADVISORY, LLC

/s/ Edward Cofrancesco  
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Edward Cofrancesco  
Chief Financial Officer

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