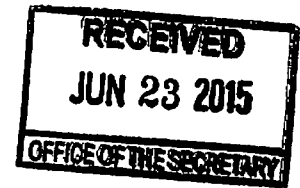


Bulldog Investors, LLC, 250 Pehle Avenue, Suite 708, Saddle Brook, NJ 07663

// Fax: //

June 19, 2015



VIA FACSIMILE (202-772-9324) AND FIRST CLASS MAIL

Brent J. Fields
Secretary
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Release No. IC-31598; File No. 812-14368; Business Development Corporation of America, et al.

In Support of Request For Hearing Prior to Issuance of an Order Under Sections 17(d) and 57(i) of the Investment Company Act of 1940 (the "Act") and Rule 17d-1 Under the Act to Permit Certain Joint Transactions Otherwise Prohibited by Sections 17(d) and 57(a)(4) of the Act and Rule 17d-1 Under the Act

Dear Mr. Fields:

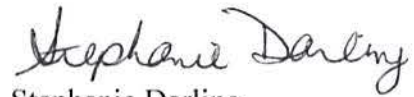
On June 8, 2015 Bulldog Investors, LLC ("Bulldog") submitted a request that the Commission hold a hearing prior to issuing the above referenced order. In support of such request, we wish to note that two lawsuits have been filed naming as defendants therein certain principals of Business Development Corporation of America ("BDCA") and one director of BDCA Venture, Inc. ("BDCA Venture") and alleging securities law violations.

In particular, on May 28, 2015 an investor in American Realty Capital Properties ("ARCP") filed a claim in U.S. District Court, naming as defendants, among others, ARCP, Leslie Michelson, Peter Budko and Nicholas Schorsch. In addition, on December 23, 2014, a securities class action claim was brought in Maryland state court against, among others, ARCP and Messrs. Michelson, Budko and Schorsch. Both lawsuits concern such defendants' actions in connection with ARCP and set forth certain securities law claims relating to the dissemination of materially false and misleading information.

The existence of such lawsuits support our contention that the Commission should not rush to issue the order, but rather should allow time for such lawsuits to proceed through the court system in order that the relevant facts of each case can be brought to light and considered in connection with whether such order should be granted.

Any comments or questions regarding this request may be addressed to the undersigned at [REDACTED], email: [REDACTED]

Very truly yours,


Stephanie Darling
General Counsel


CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of June 2015, a letter in Support of Request for Hearing Prior to Issuance of an Order, was sent via U.S. First Class Mail to the following interested parties:

James A. Tanaka
General Counsel
RCS Capital
405 Park Avenue
14th Floor
New York, NY 10022

and

Steven B. Boehm, Esq.
Sutherland Asbill & Brennan LLP
700 Sixth Street, NW
Suite 700
Washington, DC 20001-3980


Stephanie L. Darling
General Counsel
Bulldog Investors, LLC