



DIVISION OF
CORPORATION FINANCE

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

March 19, 2021

Rick Melero
Manager
HIS Capital Fund III, LLC
c/o Ark Fund Management, LLC
2151 Consulate Dr., Suite 6
Orlando, FL 32837

Re: HIS Capital Fund III, LLC
Offering Statement on Form 1-A
Post-qualification Amendment No. 1
Filed February 22, 2021
File No. 024-11242

Dear Mr. Melero:

We have reviewed your amendment and do not have any comments.

We will consider qualifying your offering statement at your request. If a participant in your offering is required to clear its compensation arrangements with FINRA, please have FINRA advise us that it has no objections to the compensation arrangements prior to qualification.

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.

Please contact Ronald (Ron) E. Alper at 202-551-3329 or Mary Beth Breslin at 202-551-3625 with any questions.

Sincerely,

Division of Corporation Finance
Office of Real Estate & Construction

cc: Richard Robinette