

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

August 1, 2025

Chirag Bhavsar Chief Executive Officer CNL Strategic Residential Credit, Inc. 450 South Orange Avenue, Suite 1400 Orlando, Florida 32801-3358

> Re: CNL Strategic Residential Credit, Inc. Form 10-12G Filed June 2, 2025 File No. 000-56755

Dear Chirag Bhavsar:

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

cc: Jason Myers