

UNITED STATES OF AMERICA  
BEFORE THE  
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT COMPANY ACT OF 1940  
Release No. 34851 / March 7, 2023

In the Matter of:

Constitution Capital Access Fund, LLC  
Constitution Capital PM, L.P.  
Constitution Capital Equity Partners, L.P.  
Constitution Capital Credit Partners, L.P.  
Ironsidess Partnership Fund VI, L.P.  
Ironsidess Offshore Partnership Fund VI, L.P.  
Ironsidess Co-Investment Fund VI, L.P.  
Ironsidess Offshore Co-Investment Fund VI, L.P.  
Ironsidess Opportunities Fund II, L.P.  
Ironsidess Opportunities Offshore Fund II, L.P.  
Ironsidess Partnership Fund IV, L.P.  
Ironsidess Direct Investment Fund IV, L.P.  
Ironsidess Partnership Fund V, L.P.  
Ironsidess Direct Investment Fund V, L.P.  
Ironsidess Direct Investment Fund V – Parallel A, L.P.

300 Brickstone Square, Suite 1001  
Andover, Massachusetts 01810

(812-15367)

ORDER UNDER SECTIONS 17(d) and 57(i) OF THE INVESTMENT COMPANY ACT OF 1940 AND RULE 17d-1 UNDER THE ACT

Constitution Capital Access Fund, LLC, *et al.* filed an application on July 12, 2022, and amended on October 17, 2022 and January 13, 2023, requesting 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 that would permit certain joint transactions otherwise prohibited by sections 17(d) and 57(a)(4) of the Act and rule 17d-1 under the Act. The order would permit certain business development companies and registered closed-end management investment companies (collectively, the “Regulated Funds”) to co-invest in portfolio companies with each other and with certain affiliated investment funds.

On February 7, 2023, a notice of the filing of the application was issued (Investment Company Act Release No. 34828). The notice gave interested persons an opportunity to request a hearing and stated that an order disposing of the application would be issued unless a hearing was ordered. No request for a hearing has been filed, and the Commission has not ordered a hearing.

The matter has been considered and it is found, on the basis of the information set forth in the application, as amended, that participation by the Regulated Funds in the proposed transactions is consistent with the provisions, policies and purposes of the Act and is on a basis no less advantageous than that of other participants.

Accordingly,

IT IS ORDERED, under sections 17(d) and 57(i) of the Act and rule 17d-1 under the Act, that the relief requested by Constitution Capital Access Fund, LLC, *et al.* (File No. 812-15367) is granted, effective immediately, subject to the conditions contained in the application, as amended.

For the Commission, by the Division of Investment Management, under delegated authority.

Sherry R. Haywood  
Assistant Secretary