

UNITED STATES OF AMERICA
BEFORE THE
SECURITIES AND EXCHANGE COMMISSION

INVESTMENT COMPANY ACT OF 1940
Release No. 34961 / July 18, 2023

In the Matter of

VISTA CREDIT STRATEGIC LENDING CORP.
VISTA CREDIT BDC MANAGEMENT, L.P.
VISTA CREDIT PARTNERS, L.P.
VISTA CREDIT CLO MANAGEMENT LLC
VISTA CREDIT PARTNERS FUND III, L.P.
VISTA CREDIT OPPORTUNITIES FUND II, L.P.
VISTA OPPORTUNISTIC CREDIT FUND I, L.P.
VISTA OPPORTUNISTIC CREDIT FUND II, L.P.
VISTA OPPORTUNISTIC CREDIT FUND II-A, L.P.
VISTA OPPORTUNISTIC CREDIT FUND II (2), L.P.
VISTA OPPORTUNISTIC CREDIT FUND II-A (2), L.P.
VISTA OPPORTUNISTIC CREDIT FUND III, L.P.
VISTA OPPORTUNISTIC CREDIT FUND IV, L.P.
VISTA CAPITAL SOLUTIONS FUND L.P.
VISTA CAPITAL SOLUTIONS FUND-A, L.P.
VCPF III CO-INVEST 1-A, L.P.
VCPF III CO-INVEST 2-A, L.P.
VCPF III CO-INVEST 4-A, L.P.
VCPF III CO-INVEST 5-A, L.P.
VISTA CO-INVEST FUND 2022-1, L.P.
VISTA CO-INVEST FUND 2022-2, L.P.
VISTA CO-INVEST FUND 2022-3, L.P.
VCP CLO III, LTD.
VISTA PLATFORM FUND I, L.P.
VISTA PLATFORM PARTNERS, L.P.

55 Hudson Yards, Floor 23
New York, NY 10001

(812-15323)

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

Vista Credit Strategic Lending Corp., *et al.* filed an application on July 26, 2022, and
amendments to the application on November 10, 2022 and April 21, 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 permits 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 entities.

On June 20, 2023, a notice of the filing of the application was issued (Investment Company Act Release No. 34946). 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 Vista Credit Strategies Lending Corp., *et al.* (File No. 812-15323) 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.