

SURO CAPITAL CORP.
One Sansome Street, Suite 730
San Francisco, CA 94104

July 27, 2020

VIA EDGAR

U.S. Securities and Exchange Commission
Division of Investment Management
100 F Street, N.E.
Washington, D.C. 20549
Attn: Christopher Bellacicco, Esq.

**Re: SuRo Capital Corp.
Pre-Effective Amendment No. 1 to the Registration Statement on Form N-2
Filed on July 27, 2020 (File No. 333-239681)**

Dear Mr. Bellacicco:

In accordance with Rule 461 of the General Rules and Regulations under the Securities Act of 1933, as amended, SuRo Capital Corp. hereby respectfully requests that the above-captioned registration statement, including all amendments thereto, be ordered effective on July 27, 2020, at 4:00 p.m., ET, or as soon thereafter as practicable.

SuRo Capital Corp.

By: /s/ Mark D. Klein
Mark D. Klein
Chief Executive Officer and President
