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March 20, 2013

VIA EDGAR

U.S. Securities and Exchange Commission  
100 F Street, NE  
Washington, D.C. 20549

**Re: Stellus Capital Investment Corporation – Preliminary Proxy Statement on Schedule 14A**

Dear Sir or Madam:

On behalf of Stellus Capital Investment Corporation, we are filing a Preliminary Proxy Statement on Schedule 14A pursuant to the rules and regulations of the Securities Exchange Act of 1934.

Please call me at the above number if you have any questions or comments regarding the foregoing.

Sincerely,

/s/ Harry S. Pangas

cc: Robert T. Ladd