

## MEMORANDUM

TO: Proposed Rule: Use of Derivatives by Registered Investment Companies and Business Development Companies  
(Release No. IC-31933; File No. S7-24-15)

FROM: Adam Bolter  
Senior Counsel, Division of Investment Management

RE: Meeting with Representatives of AQR Capital Management, LLC

DATE: June 27, 2018

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On June 27, 2018, Dalia Blass (Director, U.S. Securities and Exchange Commission (“SEC”), Division of Investment Management (“IM”)), Sarah ten Siethoff (Associate Director, IM), Brian M. Johnson (Assistant Director, IM); David Bartels (Senior Special Counsel, IM), Naseem Nixon (Senior Counsel, IM), Thoreau A. Bartmann (Senior Special Counsel, IM), Tim Dulaney (Senior Financial Analyst, IM), Roberta Ufford (Senior Special Counsel, IM), Jacob Sandoval (Branch Chief, IM), Adam Bolter (Senior Counsel, IM), James Maclean (Senior Counsel, IM), and Amy Miller (Senior Counsel, IM) met with the following representatives of AQR Capital Management, LLC:

- Michael Mendelson, Principal
- Marco Hanig, Principal
- Billy Fenrich, Principal
- Lars Nielsen
- Nicole DonVito
- Josh Peschko

Among other things, the participants discussed the SEC’s proposal relating to the use of derivatives by registered investment companies and business development companies.