

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: James Maclean
Senior Counsel, Division of Investment Management

RE: Meeting with Representatives of AQR Capital Management, LLC

DATE: September 27, 2018

On September 27, 2018, Sarah ten Siethoff (Associate Director, Division of Investment Management (“IM”)), Brian M. Johnson (Assistant Director, IM); Thoreau A. Bartmann (Senior Special Counsel, IM), Adam Bolter (Senior Counsel, IM), James Maclean (Senior Counsel, IM), and John Lee (Senior Counsel, IM) met with the following representatives of AQR Capital Management, LLC:

- Michael Mendelson, Principal
- Marco Hanig, Principal
- Billy Fenrich, Principal
- Lars Nielsen, Principal

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