

## 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: Asaf Barouk  
Attorney Advisor, Division of Investment Management

RE: Meeting with Representatives of AQR Capital Management, LLC

DATE: March 29, 2019

---

On March 29, 2019, Sarah ten Siethoff (Associate Director, Division of Investment Management (“IM”)), Brian M. Johnson (Assistant Director, IM); Thoreau A. Bartmann (Senior Special Counsel, IM), Tim Dulaney (Senior Financial Analyst, IM), Amanda Wagner (Branch Chief, IM), Sirimal Mukerjee (Senior Counsel, IM), John Lee (Senior Counsel, IM), Asaf Barouk (Attorney Advisor, IM), Dennis Sullivan (Contractor, IM), Alexander Schiller (Financial Economist, DERA) and Mi Wu (Financial Economist, DERA), 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.