

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: Call with Representatives of State Street

DATE: June 26, 2019

On June 26, 2019, Brian M. Johnson (Assistant Director, Division of Investment Management (“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), and Daniel Rooney (Assistant Chief Accountant, IM) participated on a call with the following representatives of State Street:

- Lauren Davides
- James M. Brewster
- Jennalyn Buxton
- Roderick Fisher

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