

MEMORANDUM

TO: File Nos. S7-27-18 and S7-24-15

FROM: Sirimal R. Mukerjee
Senior Counsel, Division of Investment Management (“IM”)

RE: Meeting with Representatives of Guggenheim Partners, LLC (“Guggenheim”)

DATE: June 13, 2019

On June 12, 2019, Paul Cellupica (Deputy Director and Chief Counsel, IM), Sarah ten Siethoff (Associate Director, IM), Brian McLaughlin Johnson (Assistant Director, IM), Daniele Marchesani (Assistant Director, IM), Dennis Sullivan (Contractor, IM), Thoreau Bartmann (Senior Special Counsel, IM), Melissa Gainor (Senior Special Counsel, IM), Jacob Krawitz (Branch Chief, IM), Amanda Wagner (Branch Chief, IM), Asaf Barouk (Senior Counsel, IM), John Foley (Senior Counsel, IM), Adam Lovell (Senior Counsel, IM), Sirimal R. Mukerjee, Alexander Schiller (Economist, Division of Economic and Risk Analysis) and other representatives of the SEC met with the following representatives of Guggenheim:

- Joseph Burschinger, Senior Managing Director, Chief Risk Officer, Portfolio Management;
- Ryan A. Harder, CFA, Managing Director and Portfolio Manager;
- Amy Lee, Senior Managing Director, Deputy General Counsel, Registered Funds;
- Jaime A. Madell, Managing Director and Associate General Counsel; and
- Rob Saperstein, Senior Managing Director, Global Head of Compliance and Senior Counsel.

Among other things, the participants discussed matters relating to the Commission’s proposals regarding fund of fund arrangements and the use of derivatives by registered investment companies and business development companies.