



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
**SECURITIES AND EXCHANGE COMMISSION**  
WASHINGTON, D.C. 20549

January 29, 2013

Via E-mail

Mr. Martin Kelly  
Chief Financial Officer  
Apollo Global Management, LLC  
9 West 57th Street, 43rd Floor  
New York, New York 10019

**RE: Apollo Global Management, LLC**  
**Form 10-K for the Year Ended December 31, 2011**  
**Filed March 9, 2012**  
**File No. 1-35107**

Dear Mr. Kelly:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Pamela Long

Pamela Long  
Assistant Director