



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

DIVISION OF
CORPORATION FINANCE

July 31, 2019

Leon Black
Chairman and Chief Executive Officer
Apollo Global Management LLC
9 West 57th Street, 43rd Floor
New York, NY 10019

Re: Apollo Global Management LLC
PRE 14C
Filed July 15, 2019
File No. 001-35107

Dear Mr. Black:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance
Office of Financial Services