

ADVERTISING REGULATION DEPARTMENT REVIEW LETTER

July 12, 2019



Reference: **FR2019-0703-0047/E**
Link Reference : FR2019-0207-0338

Org Id: 

1. fi360 Model Portfolio Report
Rules: FIN 2210, SEC 482
18 Pages

Total Fee: \$205

Dear ,

The submitted material appears to be consistent with applicable standards, however we have the following comment:

We note that this material was submitted to the Department on July 3, 2019 as a sample Model Portfolio Report with investment data as of 5/31/2019. The report dated 5/31/2019 did contain total returns for the Funds as of March 31, 2019 in accordance with SEC 482. However, please be advised SEC Rule 482 requires total return quotations be current to the most recent quarter ended prior to the submission of the advertisement for publication.

Reviewed by,

Jeffrey R. Salisbury
Associate Principal Analyst

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This year's Advertising Regulation Conference will be held on October 24-25 in Washington, D.C. For more information and to register, please access the conference webpage at www.finra.org/2019adreg.

***NOTE:** We assume that your filed communication doesn't omit or misstate any fact, nor does it offer an opinion without reasonable basis. While you may say that the communication was "reviewed by FINRA" or "FINRA reviewed," you may not say that we approved it.*

Please send any communications related to filing reviews to this Department through the Advertising Regulation Electronic Filing (AREF) system or by facsimile or hard copy mail service. We request that you do not send documents or other communications via email.