

ADVERTISING REGULATION DEPARTMENT REVIEW LETTER

April 3, 2019



Reference: FR2019-0207-0332/E Org Id:

1. fi360 RFP Director

Rules: FIN 2210, SEC 482

56 Pages Total Fee: \$585

Dear

Revisions are necessary for the communication submitted to be consistent with applicable standards.

We note the presentation of information regarding money market mutual funds. Therefore, this report must be revised to include the disclosure statements set forth in SEC Rule 482(b)(4) as applicable, and also clearly identify which statement applies to which fund(s).

Please be advised that this review does not offer comment with regard to the fi360 software and any output determining the appropriateness or the suitability of a particular investment.

If you have any questions about this review please call me at 240.386.4500.

Reviewed by,

Mark E. Smith Principal Analyst

mes



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.