

Broker-dealers are required to disclose any material arrangements with the venues listed in each section below, including, but not limited to, any internalization or payment for order flow arrangements.

SEC-required report on routing of customer order

Russell Investments Implementation Services, LLC.

For quarter ending September 30, 2019

NYSE

Non-Directed Orders	100.00%
Market Orders	99.79%
Limit Orders	0.10%
Other Orders	0.00%

Orders routed to:	Percentage
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NYSE	43.65%
NASDAQ OMX PX	12.00%
Fidelity CrossStream	11.65%
Virtu Matchit ATS	8.63%
ITG POSIT	4.24%
NASDAQ	4.17%
Instinet BlockCross	2.51%
UBS PIN ATS	2.00%
IEX Market	1.97%
NASDAQ OMX BX	0.99%

NASDAQ

Non-Directed Orders	100.00%
Market Orders	99.97%
Limit Orders	0.03%
Other Orders	0.00%

Orders routed to:	Percentage
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NASDAQ	27.39%
NYSE	11.17%
Fidelity CrossStream	11.10%
Virtu Matchit ATS	9.70%
NASDAQ NMS GS	8.21%
Instinet BlockCross	7.64%
Credit Suisse AES CrossFinder	3.60%
Instinet BlockCross	3.03%
ITG POSIT	2.76%
IEX Market	2.15%

AMEX

Non-Directed Orders	100.00%
Market Orders	100.00%
Limit Orders	0.00%
Other Orders	0.00%

Orders routed to: Percentage

NASDAQ OMX PX	23.17%
NASDAQ	22.55%
NYSE	9.65%
Virtu Matchit ATS	8.76%
NASDAQ OMX BX	7.14%
Fidelity CrossStream	4.44%
ITG POSIT	3.61%
Toronto Stock Exchange	3.02%
UBS PIN ATS	2.90%
NYSE AMEX	1.83%

Options**Orders routed to: Percentage**

NoDATA to REPORT