



All requested changes have been made in accordance with FINRA's request.

A. Hill 02/02/2024

ADVERTISING REGULATION DEPARTMENT REVIEW LETTER

January 19, 2024

Mr. Art Hill
Russell Investments Financial Services, LLC
1301 2nd Ave
Seattle WA 98101

Reference: **FX2024-0116-0154/B**
Link Reference: FR2023-0105-0094

Org Id: 21771

1. RIC Sustainable Equity Fund Manager Profile (#RIFIS-25847)
Rules: FIN 2210, SEC 482
8 Pages

Total Fee: \$600

Dear Mr. Hill,

We note that the following comment was not provided previously and apologize for any inconvenience. A revision is necessary for this material to be consistent with applicable standards. We have the following specific comment.

We note, in addition to the name of the Fund itself (“Sustainable Equity Fund”), the discussion of the Fund’s “sustainability goals” as well as ESG throughout the material. In order to provide investors with a fair and balanced presentation, pursuant to FINRA Rule 2210(d)(1)(A), the potential risks associated with considering ESG or sustainability factors must be incorporated in the communication.

Reviewed by,

Joel D. Levinson
Associate Principal Analyst

hrm



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.

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.*