

January 7, 2010  
Reference: **FR2009-1215-0208/E**

Org Id :00008408

## REVIEW LETTER

1. IRA\_AnalyzerFINAL  
Rule: 2210  
34 pages

Fee: \$340

Total Fee: \$340

Per a letter dated January 5, 2010 and a telephone conversation with Chad Thuner on January 6, 2010, we understand that this IRA Analyzer is an interactive tool created by a third party (Newkirk Publications aka NPI). We further understand that the firm's representatives intend to have a link to the Analyzer on their respective website. The firm has not created nor will it maintain the tool, it will simply pay to have access to it.

Revisions are necessary for this material to comply with applicable standards.

With respect to the "IRA Comparison" and "IRA Conversion" calculators, pursuant to Rule 2210(d)(1)(A), the material should disclose in effect the following:

- The inherent risks of investing.
- Clearly explain that investment return will vary, particularly for long-term investments.
- Given that the investor may select the rate of return, you should disclose that investments offering the potential for higher rates of return also involve a higher degree of risk. Rates of return must not exceed 12 percent.
- Notwithstanding the disclosure in the assumptions window, the results pages should clearly disclose that the amounts calculated are hypothetical and for illustrative purposes only.

In closing, please be advised that this review does not extend to the merits of the tax and financial planning advice.

Reviewed by,  
Angelina M. Gerovac  
Supervising Analyst

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**NOTE:** *This review is limited to the communication that was filed. We assume that the communication does not omit material facts, contain statements that are not factual, or offer opinions that do not have a reasonable basis. This communication may be described as "Reviewed by FINRA" or "FINRA Reviewed"; however, there must be no statement or implication that this communication has been approved by FINRA.*