

June 5, 2018

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Reference: **FR2018-0508-0406/E**

Org Id :169804

REVIEW LETTER

1. Investing with Confidence (#C32870)

Rules: FIN 2210, SEC 482

20 Pages

Fee: \$225

Total Fee: \$225

Attention: Andy Epstein

Revisions are necessary for this communication to be consistent with applicable standards. We have the following specific comments:

Page 20 includes the prospectus offer in accordance with SEC Rule 482(b)(1). However, the prospectus offer must be presented in a font size similar to the main text and in a *different style* from the main text pursuant to the presentation standards in SEC Rule 482(b)(5). Therefore, the prospectus offer must be revised accordingly.

If you have any questions regarding these comments, please contact me at (240) 386-4500.

Reviewed by,

Bradley G. Raymond
Associate Principal Analyst

jb



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.

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