

May 2, 2011

Reference: **FR2011-0310-0155/E**

Org Id :00008408

REVIEW LETTER

1. Loose Change 2012 Calendar
Rule: 2210
14 pages

Fee: \$140

Total Fee: \$140

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

Rule 2210 (d)(1)(B) states that no member may make any false, exaggerated, unwarranted or misleading statement or claim in any communication with the public. IM-2210-1(1) states that member communications should be consistent with the risks of fluctuating prices and the uncertainty of dividends, rates of return and yield inherent to investments. We offer the following comments pursuant to Rule 2210 (d)(1)(B) and IM-2210-1(1):

The reference to “you’ll” in the statements, “*By staying with your guide and keeping to the path you’ve set for yourself, you’ll reach your investing destination right on schedule*” (Cross Asset Allocation Ridge section and “*The longer your account earnings compound and grow, the more money you’ll have when your child is ready for college*” (Save Early, Save Often section) must be deleted or revised. The language does not reflect the inherent fluctuating and uncertain nature of investments and is presented as a “*certainty*” rather than a “*possibility*.” Furthermore, it appears promissory of positive investment results.

Reviewed by,

Lynn M. Lawson
Supervising Analyst

jag



***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.*

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.