

March 8, 2010

Julie Pemberton
Valmark Securities, INC.
130 Springside Drive, Suite 300
Akron OH 44333

Reference : FR2009-0915-0163/H

Org Id :00031243

REVIEW LETTER

1. Link'em Software
Rule: 2210
6 pages

Fee: \$100

Total Fee: \$100

Attention : Julie Pemberton

The filing fees identified above were charged previously and are listed here for informational purposes only.

Please be advised that we were not able to install the Link'em software in order to see a "live" demonstration of the program. Consequently, our comments only reflect a review of the screen shots submitted and not the actual software.

While the material submitted appears to be generally consistent with applicable standards, we have the following comments:

We remind you that it remains your firm's responsibility to ensure that the program does not create hyperlinks to websites that knowingly contain misleading, exaggerated, or unwarranted claims and statements.



Please be advised that our review does not reflect an opinion regarding the merits of the marketing system described in the cover letter dated October 19, 2009. Furthermore, we offer no comment with respect to the “End-User Licensing Agreement.”

Reviewed by,

John F. Cunningham
Supervising Analyst

jrk

***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.*