



November 30, 2009

Julie Pemberton
Valmark Securities, Inc.
130 Springside Dr. Suite 300
Akron OH 44333

Reference: **FR2009-1106-0410/H**

Org Id :00031243

REVIEW LETTER

1. Custom Marketing Video
Rule: 2210
6 pages

Fee: \$100

Total Fee: \$100

Attention: Julie Pemberton

Revisions are necessary for the material submitted to be consistent with applicable standards.

Contrary to the standards set forth in Rule 2210(d)(1)(B), the photograph of golden eggs is promissory and unwarranted as the image implies significant gain in wealth using the products and strategies promoted without a reflection of the risks associated with investing. Therefore, the photograph must be deleted.

We direct your attention to the statement, "All of our advisors are here to help you achieve your financial goals, answer your questions and give you peace of mind regarding your financial plan." Contrary to Rule 2210(d)(1)(B), the phrase "peace of mind" is promissory and misleading as it implies a lack of risk associated with investing. Therefore, the phrase must be deleted.

Contrary to Rule 2210(d)(1)(B) and IM-2210-4(1), the reference to FINRA review in the introduction letter is unwarranted as it implies endorsement of the material by FINRA. Therefore, such references must be deleted.



Pursuant to the standards set forth in Rule 2210(d)(1)(A), the presentation must disclose prominently that the strategies and investments offered carry risks and there can be no guarantee that any strategy will achieve its intended objective. This disclosure is necessary to provide a more balanced presentation.

Sincerely,

John F. Cunningham
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.*