

June 21, 2018



Reference: **FX2018-0618-0212/E**
Link Reference : FR2018-0427-0191

Org Id :13572

REVIEW LETTER

1. Riskalyze Current Portfolio Report
Rules: FIN 2210, FIN 2214, SEC34B1
15 Pages

Fee: \$850

Total Fee: \$850

Attention: 

We note this is a revised version of material reviewed previously by the Department, and that revisions have been made in an effort to address our concerns. Thank you for your cooperation.

This material generally appears consistent with applicable standards. However, we have the following comments:

We note the following FINRA member name identification language in the text of the report as well as in the report's persistent footer: "Securities are not offered through Jamison Wealth Management since it isn't real and isn't a Registered Broker/Dealer, Member FINRA/SIPC," Please be advised that it is our understanding that, upon use of this report, this language will be replaced with language that prominently discloses the name of the member firm and clearly reflects any relationship between the member firm and any non-member entity or individual also named in the report, as required by FINRA Rule 2210(d)(3). If our understanding is incorrect, please notify us promptly as further comments will be necessary.

Additional important information:

1. Please note that our review is based upon and reflect our understanding that, as it applies to the inclusion of the iShares Silver Trust (SLV), your material has been filed as a free-writing prospectus, pursuant to the standards set forth under SEC Rule 433.
2. Please be advised that we have reviewed the submitted output of the Riskalyze tool for compliance with FINRA Rule 2214, “Requirements for the Use of Investment Analysis Tools.” Note that this review does not constitute an evaluation of the Riskalyze’s product. We are not providing an opinion on the methodology used in the software.
3. Further, our review of any communication for compliance with our Rules should not be construed as an endorsement or approval of the subject matter or of its suitability for investors. Such review does not necessarily imply that we have determined that all information contained in such communication is accurate or complete. In addition, our review does not relieve the member of its responsibilities under applicable Self-Regulatory Organization Rules and Federal Securities Laws.
4. Overall, please note that the comments within this letter pertain only to the output filed. With regard to additional outputs or products that may be discussed in the output, pursuant to FINRA Rule 2210(g), it remains your responsibility to ensure that the material complies with all standards applicable to the discussion of or performance data provided for any product included in the material.
5. We note that the material does not mention a specific money market fund. We also note that the material includes an allocation to “Cash / Money Market” and a brief disclosure pertaining to money market funds on page 14. Please be advised that, technically, pursuant to SEC Rule 34b-1(a), cross-referencing SEC Rule 482(b)(4), if a specific money market fund is mentioned, the relevant disclosures required by (b)(4) must be included.



If you have any questions about the comments in this letter, please feel free to contact me at (240) 386-4500.

Reviewed by,

Susan M. Kole
Associate Principal 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.*

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.