

April 1, 2013

John Mulkern  
Upromise Investments, Inc.  
95 Wells Avenue  
Newton MA 02459

Reference: **FX2013-0326-0148/E**

Org Id :36478

### REVIEW LETTER

1. MKT 7258 Indiana Advisor College Savings Seminar  
Rules: FIN 2210, MSRB  
23 pages

Fee: \$1250

Total Fee: \$1250

Attention: John Mulkern

The material submitted generally appears consistent with applicable standards. However, we include the following comments.

We note that this material includes placeholders on both the opening slide and Slide 21 for the name and firm of a registered representative. Pursuant to Rule 2210(d)(2)(C)(ii), if the firm named is not your firm, the material must reflect any relationship between the member and any named non-member or individual.

Also, please note that our opinion applies only to the material submitted. We offer no comment on the presentation as actually delivered (i.e., the oral presentation). It is your responsibility to ensure that whenever this presentation is given it is fair, balanced, and consistent with all applicable advertising standards.

Please feel free to call me at 240-386-4500 if you have questions about the comments above.

Reviewed by,

Thomas G. Dineen, III

Investor protection. Market integrity.

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Senior Analyst

tgd

***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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