



ADVERTISING REGULATION DEPARTMENT REVIEW LETTER

September 03, 2021

Mr. Joseph Kelly
Dunham & Associates Investment Counsel, Inc.
6020 Cornerstone Ct W, Suite 300
San Diego CA 92121

Reference: **FR2021-0528-0008/E**

Org Id: 13162

1. Perhaps The Best Sleep
Rule: FIN 2210
2 Minutes

Total Fee: \$125

Dear Mr. Kelly,

The communication submitted appears consistent with applicable standards.

Reviewed by,

Megan E. Callery
Senior Analyst

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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.

NOTE: *We assume that your filed communication doesn't omit or misstate any fact, nor does it offer an opinion without reasonable basis. While you may say that the*



communication was "reviewed by FINRA" or "FINRA reviewed," you may not say that we approved it.