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PO Box 32  
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October 30, 2014

U.S. Securities and Exchange Commission  
Division of Investment Management  
100 F Street, NE  
Washington, DC 20549

I am writing to request a no-action letter from the SEC for a new business.

Below are the facts for the business:

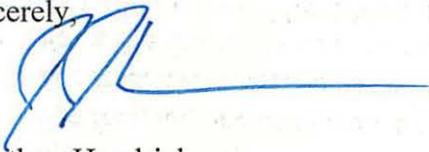
- The business will be based in Wyoming
- The business is a website providing a list of securities available on LendingClub.com that we think would be good investments.
- All users see the same list. It is NOT personalized for any individual user.
- The list will be available all times of the day and every day of the year and will update based upon the securities currently available on Lending Club.
- For free, anyone can create an account on the site.
- For free, users can see partial information about each recommendation.
- For a flat fee, users can see complete details on the securities we recommend. Including unique identifying information for each security needed to make a purchase on Lending Club.
- We do NOT receive any fees based upon the user's purchase of the securities. We don't know if the user ever bought the security or not.
- We do NOT have access to a user's account on Lending Club

Our understanding is that we do not need to register as Investment Advisors because we meet the standards of an investment newsletter (Lowe v SEC 472 US 181 [1985]).

Can you please issue a no-action letter to confirm the SEC's position on this business?

Thank you for your time and the no-action letter.  
The letter can be mailed to the address above.

Sincerely,



Jonathon Hendricks