

January 17, 2014

**VIA FACSIMILE (703-813-6984)**

Stacie D. Gorman, Attorney-Advisor  
Beth Frohlichstein, Esquire  
United States Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, NE  
Washington, D.C. 20549


**Re: Allegiancy, LLC (the "Issuer")  
Offering Statement on Form 1-A  
File No. 024-10354**

Dear Ms. Gorman and Ms. Frohlichstein:

In connection with the above-referenced Offering Statement on Form 1-A (File No. 024-10354), we, the managing underwriter for the above referenced offering, hereby join in the request of Allegiancy, LLC that the Offering Statement be declared qualified at 4:00 p.m., Eastern Time, on January 22, 2014, or as soon as practicable thereafter.

Very truly yours,

MOLONEY SECURITIES CO., INC.

By:   
James A. Riggs, Executive Vice President