

HARD COPY

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549



In the Matter of

CHRISTOPHER M. GIBSON,

Respondent

**ADMINISTRATIVE PROCEEDING
File No. 3-17184**

MOTION FOR ORAL ARGUMENT

Pursuant to Rule 451 of the Rules of Practice, and the Order Granting Petition for Review and Scheduling Briefs, dated March 6, 2017,¹ Respondent Christopher M. Gibson respectfully requests that the Commission hear oral argument in this proceeding.

Rule 451 provides that oral argument is appropriate when “the presentation of facts and legal argument in the brief and record and the decisional process would be significantly aided by oral argument.” Here, oral argument would significantly aid the decisional process because this case involves issues concerning fiduciary duties under the Investment Advisers Act, disclosure of conflicts of interest, and the definition of the term “front running.” Oral argument would assist the Commission with respect to the issues.

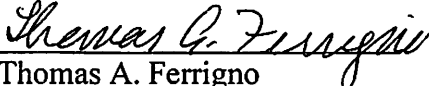
Rule 451 also provides that “[m]otions for oral argument with respect to whether to affirm all or part of an initial decision by a hearing officer shall be granted unless exceptional circumstances make oral argument impractical or inadvisable.” Rule 451(a). No such exceptional circumstances are present here.

¹ See *Christopher M. Gibson*, Order Granting Petition for Review and Scheduling Briefs, Rel. No. 80163 (Mar. 6, 2017), Administrative Proceeding No. 3-17184.

For the foregoing reasons, Respondent Gibson respectfully requests that the Commission schedule oral argument in this proceeding.

Dated: April 5, 2017
Washington, D.C.

Respectfully submitted,


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Attorney for Respondent,
Christopher M. Gibson

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of April, 2017:

- (i) an original and three copies of the foregoing Motion for Oral Argument were filed by facsimile and hand-delivery to the following address:

Office of the Secretary
Securities and Exchange Commission
100 F Street, N.E.,
Washington, D.C. 20549-9303

- (ii) a copy was sent via email to H. Michael Semler, Assistant Chief Litigation Counsel at SemlerH@SEC.gov;
- (iii) a copy was delivered by hand to H. Michael Semler, Division of Enforcement, Securities and Exchange Commission, Room 5932, 100 F Street, N.E., Washington, D.C. 20549; and
- (iv) a copy was sent via email to Brenda P. Murray, Chief Administrative Law Judge, at ALJ@sec.gov.


Thomas A. Ferrigno