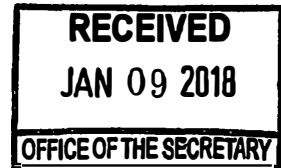


December 14, 2017



Securities and Exchange Commission

100 F Street NE

Washington, D.C. 20549

Administrative Proceeding File No 3-18256

RE: Addendum In The Matter of the Application of Bruce Zipper for Review of Action Taken by FINRA To Bar Bruce Zipper from the Securities Industry

Att: Ms. Jill Peterson

I am filing this addendum in this matter listed above due to substantial changes at Dakota Securites in the management team now in place that FINRA is now convinced can run the company in accordance with all FINRA Rules and Regulations. In early November 2017 Dakota Securities hired Gary Cuccia to be the CEO, FINOP and Compliance officer for the firm. Mr. Cuccia brings a wealth of experience in the industry and a spotless record with the regulatory bodies to the firm. Mr. Cuccia has met and talked with FINRA representatives from the Boca Raton Florida office of FINRA and has taken certain measures that FINRA thought were necessary for Dakota Securities to succeed as a broker dealer in the industry. This a a key component in addressing The Security and Exchange Commission concern that the supervisors in the original business plan lacked the necessary experience and independence to run Dakota Securities in a satisfactorily

manner. Another area I want to bring to the Commission's review is the area of FINRA's Rules that the relevant rules are, and were applied in a manner consistent with the purposes of the Exchange Act. Bruce Zipper was charged with failing to list 3 judgements on his U-4 listed on the firm's CRD Gateway Platform. This was the first time Zipper was charged with this exception. This is an offense that is most often adjudicated by FINRA with a warning to list the judgements and make sure you don't do this again or there will be a fine and possible suspension that will occur. FINRA decided not to do this but suspend me for 90 days and fine me thousands of dollars. This is a terrible overreach for the offense committed. No harm was done, no client filed a complaint, and no one other than FINRA knew it even happened. When attending a FINRA compliance conference in Coral Gables Fl. a couple of years ago the FINRA Director started the meeting with GOOD NEWS for all you small broker dealers out here. FINRA in its exams will now be concentrating on the big issues, AML, Churning, Improper Trades against client objectives, fraud and other major offenses. He went on to say we are not going to sweat the smaller issues, Not having your U-4's up to date, not having client applications filled out exactly right and so on. Now we have Bruce Zipper in 2016 charged with not having his U-4 updated in a timely mannner and this is worthy of 90 day suspension and thousands of dollars in fines. This is my complaint in that FINRA violated their own rules in seriously overcharging me for an offense that they have many times handled with a just fix your U-4 and don't do it again. Particularly when it is the first offense. This is overreaching in a major way. I would like the Commission to ask FINRA how many times this fine and suspension were given for this first time offense and how many times they did not charge the firm and broker for this first time offense. I told this Commission in the past that there was a very strong bias against me by the FINRA representatives in the Boca Raton Fl office of FINRA. This is only proving my point. These penalties and a ban from the industry are totally unjustified for the offenses committed. I still stand by my reasons for being allowed to reach out to a client or vendor if there was a problem that came up where I

was the only one who could answer it. I was a one man business. The attorney, Kevin Rosen, who drafted the AWC in question said to me he WAS aware of the unusual circumstances of the firm and that I in fact could intervene if I was the only one who answer the problem in question. Did this Commission think that I was not aware that my e-mails would be checked by FINRA post suspension? Does the Commission believe I was trying to hide these e-mails or deny them? Obviously with my talk with Mr. Rosen I felt I had the right to do so and I did. I could have called the people I sent e-mails to but felt the communication was allowed. In the case of my e-mails to Global Relay, Dakota's e-mail archiving company, they wouldn't ACCEPT a phone call but needed something from me in writing to protect themselves in case it wasn't Bruce Zipper telling them to do something to fix the problem for security reasons. Zipper was the only person listed with Global Relay to take direction from because Zipper was the only employee of the firm. Lastly and as important as all the other issues being raised by me in this letter, I want to bring your attention to the letter I sent dated December 4, 2017. In that letter I sent exhibits that dealt with my MC-400 hearing in May of 2017. I want you to look at exhibits D and E. Why are they relevant? These documents reflect the letter that FINRA sent to the independent board telling them about my background and who would be voting on my MC-400 application which was my appeal to stay in the industry. I have shown you proof that FINRA, attempting to show me in the worst possible light, knowingly lied in their letter of presentation to the panel in an effort to have them vote against me staying in the industry. And FINRA did this knowing that they were lying as proven by the documents presented to the Commission for review. I want to know the Commission's response to this. Is it OK? It really didn't matter that they lied? Hopefully, should I have to continue my appeal in Florida State Court maybe they will think lying does matter when it comes to someone trying to earn a living in an industry where they have been practicing for 35 years. Thanks again for your consideration in this matter.

**Sincerely,**

**Bruce Zipper**

**cc: Attorney Andrew Miller**