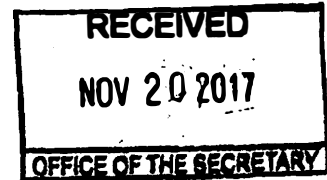


November 10, 2017



Brent J Fields, Secretary
Securities and Exchange Commission
100 F Street, NE
Room 10915
Washington, D.C. 20549

In The Matter of the Application for Review of Bruce Zipper with Dakota
Securities International, Inc.

Administrative File No. 3-18256

Dear Mr. Fields:

Please find Bruce Zipper's brief in response to Finra's opposition to The
Securities and Exchange Commission request by Bruce Zipper for a stay in
this matter.

Sincerely,

Bruce Zipper

A handwritten signature in cursive script that reads "Bruce Zipper".

cc: Andrew Love

I come to the Securities and Exchange Commission to state why I believe I am entitled to a stay in this matter while the Commission reviews the case and issues in time its opinion. Mr. Love, the attorney for Finra, has submitted the same papers to the Commission that it has produced as to why Mr. Zipper should be expelled from the industry. There is nothing new at all in his brief opposing the Commission issuing a stay to me in this matter.

Here is why I believe a stay should be granted:

The offense I was charged with which is failing to update my U-4 for 3 past judgments. That offense was paid for in thousands of dollars in fines and a 90 day suspension which I both paid and served. Finra believes this FIRST time offense is now worthy of expulsion from the industry due to the allegation I would be a harm to both the market and investors and would also not serve the public interest if a stay is granted. I find that argument both unfair and more importantly not true. I have been in this industry for 35 years. I have never been suspended with having to spend time away from my company until this offense in question. In those 35 years I have never had one complaint filed against me from any client in which I was the broker of record. Not One. I have yet to see in Mr. Love's argument what harm was done to the public for the offense of not updating my U-4 in a timely manner. The reason is that there isn't any harm to the public and the claim of not being in the public interest is false.

I want the Commission to take notice in that all the filings and all the motions Finra has not ever mentioned once the attorney for Finra, Mr.

Kevin Rosen, who drew up the AWC in question in this matter and to which I signed in April of 2016. Why would that be? The answer is that Mr. Rosen and I agreed just prior to me signing this AWC on certain things I could do and couldn't do during my 90 day suspension from Dakota Securities. I said to Mr. Rosen that due to the nature of Dakota Securities and the fact that it is basically a one man business which I Bruce Zipper was running there may be a time when I might be the only person at the firm that could answer a question or know a fact that if not given would cause harm to both clients and the firm. Mr Rosen agreed and said he was very aware of the unusual circumstances that would present and YES, that if that situation occurred I COULD intervene and resolve the question or matter that only I could answer. This can be verified by the Commission very easily in speaking to Mr. Rosen to verify what I am saying is in fact true. This is very relevant in that Finra is always going back to the issue of Zipper sending 4 e-mails during his suspension and thus violating his AWC agreement. This is again false because I had the RIGHT to intervene when only I was able to answer a clients question or in the case where I sent an e-mail to our e-mail archiving company, Global Relay, because for security reasons they wouldn't speak to anyone but me for that reason. The fact that Dakota Securities was and still is basically a one man business makes the stay I am requesting all the more important and that each day that goes by puts the company and its clients in evermore risk.

In conclusion I am pleading with the Commission to agree to my request for a stay in this matter while you review the case in question. I have told this Commission before and now it has come true that FINRA has shown a strong bias to want to throw me out of the industry and this is what they are attempting to do here. They say as there reason for not wanting a stay to be issued by your Commission is that I would be a danger to the public and investors by being allowed to continue in the industry while this matter is reviewed. This is a ridiculous argument and not backed up with any proof that this would be true. The offense that caused this matter to be

where it is is Bruce Zipper not updating his U-4 in a timely manner. This is the danger to the public and investors? My 35 years in the business and having most of those same accounts still with me and Dakota Securities is all the proof I and the Commission should need to see makes Finra's argument ridiculous. 35 years in the industry and not one customer complaint against me from any client in which I was the broker of record should be a major fact that the Commission should take into consideration before deciding if my stay request is a danger to the public.

Thank you for your consideration in this matter and hopefully you can come to a swift decision in granting me a stay in this case. If you need to ask any questions of me I can be reached at [REDACTED]. And my cell number is [REDACTED].

November 10, 2017



Administrative File # 3-18256

Please find a copy of Bruce Zipper's response to Finra letter dated November 9, 2017 in opposing mr. Zipper's request for a stay in this matter pending S.E.C. review

3 HARD COPIES will be mailed
VIA USPS.

A handwritten signature in cursive script, appearing to read "Bruce Zipper".