



Colleen Durbin
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April 6, 2021

VIA EMAIL

Vanessa A. Countryman, Secretary
Securities and Exchange Commission
100 F Street, NE
Room 10915
Washington, DC 20549
apfilings@sec.gov

**RE: In the Matter of the Application for Review of Robbi J. Jones and
Kipling Jones & Company, Ltd.,
Administrative Proceeding No. 3-20209**

Dear Ms. Countryman:

Enclosed please find FINRA's Opposition to Applicants' Request for Oral Argument.
Please contact me at (202) 728-8816 if you have any questions.

Sincerely,

/s/ Colleen Durbin

Colleen Durbin

Enclosure

cc: Steven M. Felsenstein, Esq.
Matthew P. Hoxsie, Esq.
William B. Mack, Esq.

**BEFORE THE
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, DC**

In the Matter of the Application of
vs.

Robbi J. Jones and Kipling Jones & Company, Ltd.,

For Review of

FINRA Disciplinary Action

File No. 3-20209

FINRA'S OPPOSITION TO REQUEST FOR ORAL ARGUMENT

Alan Lawhead
Vice President and
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**BEFORE THE
SECURITIES AND EXCHANGE COMMISSION
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FINRA’S OPPOSITION TO REQUEST FOR ORAL ARGUMENT

Applicants Robbi J. Jones and Kipling Jones & Company, Ltd. request oral argument before the Commission on the merits of their application for review. The Commission, however, should reject Applicants request for oral argument.

The standard governing requests for oral argument is restrictive – “[t]he Commission will consider appeals, . . . on the basis of the papers filed by the parties without oral argument unless the Commission determines that the presentation of facts and legal arguments in the briefs and record and the decisional process would be significantly aided by oral argument.” Commission’s Rules of Practice, Rule 451(a), 17 C.F.R. § 201.451(a).

Applicants have not demonstrated that oral argument would significantly aid the parties’ presentations of the facts and arguments, or the Commission’s decisional process. The facts and the legal arguments are not complex, and the constitutional arguments made by Applicants have been considered by the Commission in other applications for review. Finally, the Commission frequently considers applications for review involving FINRA Rule 8210 and books and records

violations, the violations that are at issue here. The parties are fully capable of presenting their arguments in their briefs.

Accordingly, the Commission should deny the request for oral argument.

Respectfully submitted,

/s/ Colleen Durbin

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April 6, 2021

CERTIFICATE OF SERVICE

I, Colleen Durbin, certify that on April 6, 2021, I caused FINRA's Opposition to Applicants' Request for Oral Argument in the matter of the Application for Review of Robbi J. Jones and Kipling Jones & Company, Ltd., Administrative Proceeding No. 3-20209, to be served by email on the following:

Vanessa A. Countryman, Secretary
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Respectfully submitted,

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