UNITED STATES OF AMERICA before the SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934 Release No. 97971 / July 25, 2023

Admin. Proc. File No. 3-20811

In the Matter of

BRUCE ZIPPER and DAKOTA SECURITIES INTERNATIONAL, INC.

For Review of Disciplinary Action Taken by

FINRA

ORDER REQUESTING ADDITIONAL WRITTEN SUBMISSION

Bruce Zipper and Dakota Securities International, Inc. ("Dakota") appeal from FINRA disciplinary action. Zipper has made several filings, purportedly on behalf of himself and "Dakota Securities," under his signature alone. But as we explained in an earlier related proceeding involving Zipper and Dakota, it does not appear that Zipper can represent Dakota in these proceedings under Rule of Practice 102(b), because he does not appear to be an officer of Dakota or an attorney.²

Accordingly, IT IS ORDERED that Dakota, through its attorney or a bona fide officer, file an additional written submission addressing whether it wishes to join Zipper's briefs in this proceeding by August 8, 2023. Pursuant to Rule of Practice 180(c),³ failure to file a brief may result in dismissal of this review proceeding as to Dakota. This order is not to be construed as expressing any view as to the Commission's resolution of these issues or the review proceeding generally.

The parties' attention is directed to the e-filing requirements in the Rules of Practice.⁴

Bruce M. Zipper, Exchange Act Release No. 86981, 2019 WL 4411974 (Sept. 16, 2019).

² 17 C.F.R. § 201.102(b) (providing in part that, in a Commission proceeding, "a person may be represented by an attorney at law" or "a bona fide officer of a corporation").

³ 17 C.F.R. § 201.180(c).

Amendments to the Commission's Rules of Practice, Exchange Act Release No. 90442, 2020 WL 7013370 (Nov. 17, 2020), 85 Fed. Reg. 86,464, 86,474 (Dec. 30, 2020), https://www.sec.gov/rules/final/2020/34-90442a.pdf; Instructions for Electronic Filing and



Service of Documents in SEC Administrative Proceedings and Technical Specifications, https://www.sec.gov/efapdocs/instructions.pdf. The amendments impose other obligations such as a redaction and omission of sensitive personal information requirement. *Amendments to the Commission's Rules of Practice*, 85 Fed. Reg. at 86,465–81.