

HARD COPY

UNITED STATES OF AMERICA

Before the

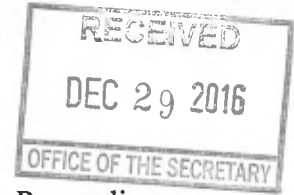
SECURITIES AND EXCHANGE COMMISSION

In the Matter of

BENNETT GROUP FINANCIAL SERVICES,
LLC, and DAWN J. BENNETT,

Respondents.

Administrative Proceeding
File No. 3-16801



MOTION FOR LEAVE TO FILE SUPPLEMENTAL BRIEF

Pursuant to Rule 450 of the Securities and Exchange Commission's ("SEC") Rules of Practice, Respondents request leave to file a short supplemental brief to address the recent Tenth Circuit decision, *David F. Bandimere v. United States Securities and Exchange Commission*, No. 15-9586 (filed December 27, 2016), which held that the SEC's Administrative Law Judge ("ALJ") who presided over the administrative proceeding was unconstitutionally appointed because SEC ALJs are considered "inferior officers" under *Freytag v. Commissioner of Internal Revenue*, 501 U.S. 868 (1991) – the very argument that Respondents have advanced regarding the unconstitutionality of the appointment of the ALJ who presided over Respondents' administrative proceeding.

Dated: December 28, 2016

A handwritten signature in blue ink, appearing to be "Eugene Ingoglia", written over a horizontal line.

Eugene Ingoglia
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*Attorneys for Respondents Bennett Group
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CERTIFICATE OF SERVICE

I, Eugene Ingoglia, Esq., hereby certify that, pursuant to Rule 150 of the Securities and Exchange Commission's Rules of Practice, on December 28, 2016, I caused a true and correct copy of RESPONDENTS' MOTION FOR LEAVE TO FILE SUPPLEMENTAL BRIEF to be served upon the following persons according to the method specified for each:


VIA FACSIMILE AND OVERNIGHT FEDEX

Office of the Secretary
United States Securities and Exchange Commission
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Washington, DC 20549
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VIA E-MAIL AND OVERNIGHT FEDEX

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Dated: December 28, 2016



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