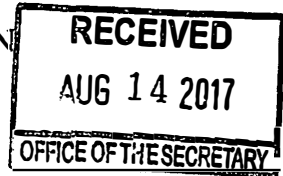


U.S. SECURITIES & EXCHANGE COMMISSION



In the Matter of the Appeal of

KIMBERLY SPRINGSTEEN-ABBOTT

**NOTICE OF APPEAL
OF N.A.C. Decision in
Complaint No. 2011025675501
Kimberly Springsteen-Abbott**

3-17560

NOTICE OF APPEAL - ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE, that pursuant to Securities Exchange Act of 1934 Rule 19d-3, Ms. Kimberly Springsteen-Abbott (“Appellant”), by her undersigned counsel, hereby appeals the decision of the National Adjudicatory Council (“N.A.C.”) of the Financial Industry Regulatory Authority (“FINRA”) with regard to Complaint No. 2011025675501 which was issued on July 20, 2017 pursuant to an Order Remanding the Proceeding to FINRA by the U.S. Securities and Exchange Commission on March 31, 2017 (“SEC’s Remand Order”).

Appellant appeals:

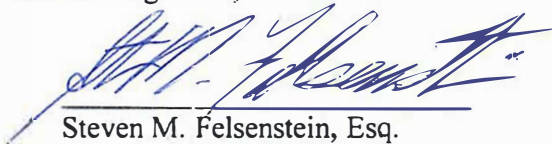
1. N.A.C.’s decision which is clearly in error and fails to comply with the SEC’s Remand Order because: a) N.A.C.’s conclusions and basis for those conclusions are based upon a misreading of the law and factual determinations not supported by the record; and (b) N.A.C.’s explanation of how its findings of violation inform the sanctions imposed is based upon a misreading of the law and factual determinations not supported by the record;
2. N.A.C.’s finding that Appellant violated FINRA Rule 2010 because she engaged in a purposeful pattern and practice of misconduct and misused investor funds which is clearly in error and premised upon a misreading of the law and factual determinations not supported by the record;
3. N.A.C.’s finding that Enforcement met its burden of proof which is clearly in error and premised upon a misreading of the law and factual determinations contradicted by the record;
4. N.A.C.’s finding that Appellant acted unethically and in bad faith and had actual knowledge of the misallocations of expenses at the time of the allocations, which is clearly in error and premised upon a misreading of the law and factual determinations not supported by or even contradicted by the record;
5. N.A.C.’s finding that Appellant personally benefitted from alleged misallocations which is clearly in error and premised upon a misreading of the law and factual determinations not supported by the record;

6. T.N.A.C.'s finding that Appellant was not truthful which is clearly in error and premised upon a misreading of the law and factual determinations not supported by the record;
7. N.A.C.'s failure to find that the Extended Hearing Panel acted with bias which is clearly in error and premised upon a misreading of the law and factual determinations not supported by the record, including statements by the Extended Hearing Panel reflecting hostility and bias;
8. N.A.C.'s finding of 84 misallocated expenses which is clearly in error and based on a disregard of the actual evidence and information before it and its refusal to accept additional evidence summarizing and organizing documents and information already in the record;
9. T.N.A.C.'s order of disgorgement of \$36,225.85, which is clearly in error and premised upon a misreading of the law and factual determinations contradicted by the record;
10. N.A.C.'s arbitrary decision to substitute its business judgment in areas beyond its expertise, instead of crediting Appellant's business judgment as to the propriety and allocation of normal business expenses;
11. N.A.C.'s order of a fine of \$50,000.00, which is clearly in error and premised upon a misreading of the law and factual determinations not supported by the record;
12. N.A.C.'s order of a permanent bar from associating with any member firm in any capacity, which is clearly in error, grossly excessive, punitive and premised upon a misreading of the law and factual determinations not supported by the record.

Appellant requests *de novo* review of the decision of the N.A.C. and reversal of the decision. She also requests oral argument before the Commission because the distortion of the actual record in this case is so extraordinary that she believes oral argument will be of assistance to the Commission.

Dated: August 11, 2017

Respectfully submitted,



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CERTIFICATE OF SERVICE

I, Steven M. Felsenstein, certify that on this 11th day of August, 2017, I caused a copy of the foregoing Notice of Appeal to be submitted to the Office of the Secretary of the U.S. Securities and Exchange Commission by overnight express delivery:

The Office of the Secretary
Securities and Exchange Commission
100 F Street, NE
Room 10915
Washington, D.C. 20549

I further certify that on this 11th day of August, 2017, I caused a copy of the foregoing Notice of Appeal to be sent via overnight express delivery to:

Attention: Lisa Jones Toms, Esq.
Office of General Counsel
FINRA
1735 K Street, N.W.
Washington, D.C. 20006

Attention: Leo F. Orenstein, Esq.
FINRA Department of Enforcement
15200 Omega Drive, Third Floor
Rockville, Maryland 20850

Attention: Sean W. Firley, Esq.
FINRA Department of Enforcement
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August 11, 2017