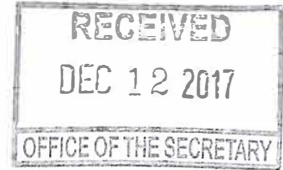




Financial Industry Regulatory Authority



Lisa Jones Toms
Assistant General Counsel

Direct: (202) 728-8044
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December 11, 2017

VIA MESSENGER

Brent J. Fields, Secretary
Securities and Exchange Commission
100 F Street, NE
Room 10915
Washington, DC 20549-1090

**RE: Application for Review of Kimberly Springsteen-Abbott
Administrative Proceeding File No. 3-17560r**

Mr. Fields:

On November 30, 2017, Kimberly Springsteen-Abbott, through her counsel, timely filed a reply brief in support of the above-referenced application for review.

In her brief, Springsteen-Abbott for the first time argues that, in light of the recent court decisions in *Kokesh v. SEC*, 137 S. Ct. 1635 (2017), and *Saad v. SEC*, 2017, 873 F.3d 297 (D.C. Cir. Oct. 13, 2017), the sanctions imposed against her by the National Adjudicatory Council, particularly her bar, are punitive rather than remedial sanctions. Springsteen-Abbott also argues in her brief that the cases stand for the proposition that her ban from the securities industry is “no longer founded upon valid law.”

Given the recent decision in *Saad*, FINRA has not addressed Springsteen-Abbott’s arguments in a brief. We believe that the Commission would benefit by having the parties submit additional briefs addressing the relevance, if any, of the *Saad* and *Kokesh* decisions in this appeal. We therefore respectfully ask that the Commission issue an order under SEC Rule of Practice 421(b), 17 C.F.R. § 201.421(b), directing the parties to file additional briefs to address this issue. *See e.g.*, Order Directing Additional Briefing, *Ahmed and Success Trade Sec., Inc.*, Exchange Act Release No. 76834, 2016 SEC LEXIS 39 (Jan. 5, 2016).

We thank you in advance for your consideration of our request. Should you have any questions regarding this request, please contact me directly at (202) 728-8044.

Brent J. Fields
December 11, 2017
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Very truly yours,

A handwritten signature in blue ink, appearing to read "Lisa Jones Toms", with a large, stylized flourish at the end.

Lisa Jones Toms

cc: Steven M. Felsenstein, Esq.
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