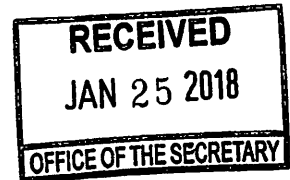


January 13, 2018



Administrative Proceeding File No. 3-18256

In The matter of the Application of

BRUCE ZIPPER

For Review of Action Taken by

FINRA

**RE: Request for Stay Pending Appeal of FINRA Action Denying Me
Permission to Continue to Associate With a FINRA Member Firm
Notwithstanding His Statutory Disqualification**

On November 27, 2017 The Commission denied my first request for a stay in this matter while it decides the case as it reviews the evidence that each side is presenting. I am now coming to the Commission with a second request for stay in lieu of the new evidence submitted to the Commission and the Commission's letter dated January 11, 2018 with an order requesting additional written submissions.

The main argument I made to the Commission was that I tried to withdraw from the AWC in question in this case due to the fact that the I was induced to accept a flawed agreement and did so the very next day after I signed this agreement in early April of 2016. I also mentioned to the Commission that FINRA had the obligation to advise me of all options available to me, which they did not, and that is wrong. FINRA, in its response to the Commission as noted in Commission's letter dated 1/11/18 stated, whether "Zipper attempted to void his AWC A DAY AFTER its execution or on May 5,

2016 is IRRELEVANT to the timeliness of his application for review. That is found to be a odds with the case that the Commission found, David L. Turnipseed, withdrawal of an executed AWC, COMMUNICATED to FINRA during such period (between the date the person signed the agreement and the date FINRA executed the agreement) REVOKES FINRA's power to accept the AWC and thus renders any such acceptance INVALID. Exchange Act Release No. 24173, 48 S.E.C. 689, 1987 WL 757592 at *1-2 (Mar 4, 1987) (setting aside NASD's findings of violations and imposition of sanctions following an offer of settlement where NASD did NOT allow the respondent to withdraw settlement offer after submitted it but BEFORE NASD accepted it). There is no dispute that I told three different members of FINRA the day after I signed it and that all three FINRA members told me one that there were NO options for me to appeal and two that if I didn't adhere to the sanctions of the AWC I would be suspended immediately. I believe this shows at the very least, as the Commission also noted in its letter of 1/11/18, that if Zipper's attempt to withdraw from the AWC and FINRA's response, if they occurred, present extraordinary circumstances warranting the Commission's consideration of his untimely application for review. That is important as the Commission noted to me in refusing to grant my original stay that only in extraordinary circumstances would the Commission grant a stay to a member facing a sanction of a bar from the industry. The second criteria that needs to be met is the "likelihood the person would prevail in his case". I think in light of the above information there IS a good likelihood that I will prevail and this AWC I signed will be found to be invalid and that all subsequent actions taken by FINRA will have to be rolled back. Thank you for your consideration in this request.

CC: ALAN LAWHEAD
ANDREW LOVE

Sincerely,

