

U.S. SECURITIES AND EXCHANGE COMMISSION
Washington, D.C.

3-18554

In the Matter of the Appeal of:

The Matter of the Continued Association of

Kimberly Springsteen-Abbott

as an

Associated Person

with

Commonwealth Capital Securities Corp.

**NOTICE OF APPEAL
Of NAC Decision in
SD-2132**



NOTICE OF APPEAL -- ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE, that pursuant to Rule 9527 of the Financial Industry Regulatory Authority (“FINRA”), and Rule 19d-3 adopted by the U.S. Securities and Exchange Commission (the “Commission”) under the Securities and Exchange Act of 1934, and Rule 420 of the Commission’s Rules of Practice, Commonwealth Capital Securities Corp. (“Appellant” or “CCSC”), by its undersigned counsel, hereby appeals the decision of the National Adjudicatory Council (“NAC”) of FINRA with regard to SD-2132, issued on May 24, 2018, denying Appellant’s Application with respect to the limited association of Ms. Kimberly Springsteen-Abbott (“Ms. Springsteen-Abbott”).

Appellant appeals:

1. NAC’s decision which is clearly in error because NAC’s findings and conclusions, and the basis for those findings and conclusions, are based upon a misreading of the law and factual determinations not supported by the record.
2. NAC’s finding that Appellant and Ms. Springsteen-Abbott violated FINRA rules by Ms. Springsteen-Abbott’s continued limited association with Appellant during the pendency of the Membership Continuance Application (“MC-400 Application”) is clearly erroneous and premised upon a misreading of the law and FINRA’s own pronouncements, and a misreading of the facts.
3. NAC’s finding that Appellant failed to demonstrate that the proposed continued limited association of Ms. Springsteen-Abbott with Appellant is in the public interest and does not create an unreasonable risk of harm to the market or investors is clearly erroneous because NAC’s findings and conclusions, and the basis for those findings and conclusions, are based upon a misreading of the law and factual determinations not supported by the record.

4. NAC's finding that Appellant failed to meet the standard enunciated by FINRA during the hearing – that the application involved extraordinary circumstances and was in the public interest – is clearly erroneous because NAC's findings and conclusions, and the basis for those findings and conclusions, are based upon a misreading of the law and factual determinations not supported by the record.
5. NAC's finding that Ms. Springsteen-Abbott engaged in serious misconduct is clearly erroneous, as demonstrated by the appeal of the underlying NAC decision and the pending appeal of the NAC decision issued pursuant to the Commission's Remand Order that is presently pending before the Commission.
6. NAC's finding that Appellant has not demonstrated that it can properly supervise Ms. Springsteen-Abbott is clearly erroneous because NAC's findings and conclusions, and the basis for those findings and conclusions, are based upon a misreading of the law and factual determinations not supported by the record.
7. NAC's findings that the testimony of Appellant's CEO and of Ms. Springsteen-Abbott lacked credibility are clearly erroneous, not supported by the record, and are tainted by the errors set forth in the other enumerated bases for this appeal.
8. NAC's decision to uphold the Hearing Panel's denial of Appellant's motion to recuse the Hearing Panel's attorney-advisor was clearly erroneous and denied Appellant its due process rights to a fair hearing.

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

Dated: June 22, 2018
Respectfully submitted,



Steven M. Felsenstein, Esq.
Greenberg Traurig, LLP
2700 Two Commerce Square
Philadelphia, Pennsylvania 19103
(215) 988-7837
felsensteins@gtlaw.com

/s/
Donald N. Cohen, Esq.
Greenberg Traurig, LLP
445 Hamilton Avenue, 9th Floor
White Plains, NY 10601
(212) 801-2171
cohend@gtlaw.com

/s/
Elaine C. Greenberg, Esq.
Greenberg Traurig, LLP
2101 L Street NW, Suite 1000
Washington, D.C. 20037
(202) 331-3106
greenberge@gtlaw.com

TO:

**The Office of the Secretary
Securities and Exchange Commission
100 F Street, NE
Room 10915
Washington, D.C. 20549-1090**

**Attention: Gary Dernelle, Esq.
Office of General Counsel
FINRA
1735 K Street, N.W.
Washington, D.C. 20006**

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In the Matter of the Appeal of

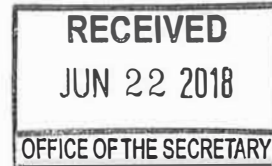
The Matter of the Continued Association of

CERTIFICATE OF SERVICE

Kimberly Springsteen-Abbott

as an Associated Person of

Commonwealth Capital Securities Corp.



Steven M. Felsenstein, Esq., being of full age, hereby certifies:

1. I am a Shareholder in the firm of Greenberg Traurig, LLP.
2. On June 21, 2018, I caused a true and correct original and three additional copies of Appellant counsel's Notice of Appeal and Notice of Appearance to be sent via United Parcel Service to:

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

and

Gary Dernelle, Esq.
Office of General Counsel
FINRA
1735 K Street, N.W.
Washington, D.C. 20006

3. I certify under penalty of perjury that the foregoing is true and correct.

A handwritten signature in blue ink, appearing to read "S.M. Felsenstein".

Steven M. Felsenstein, Esq.
Greenberg Traurig, LLP
2700 Two Commerce Square
Philadelphia, Pennsylvania 19103