

UNITED STATES OF AMERICA
before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934
Release No. 86407 / July 18, 2019

ADMINISTRATIVE PROCEEDING
File No. 3-19012

In the Matter of the Application of

CRAIG S. TADDONIO

For Review of Disciplinary Action Taken by

FINRA

ORDER ACCEPTING
APPLICANT'S BRIEF AND
GRANTING FINRA'S MOTION
TO EXCEED WORD
LIMITATION

On June 18, 2019, Craig S. Taddonio, proceeding pro se, filed a brief in support of his application for review of FINRA disciplinary action. On June 20, 2019, the Commission notified Taddonio by letter that his brief did not conform to the Rules of Practice because, among other things, it exceeded the word limitation in Rule of Practice 450(c), and instructed Taddonio to resubmit a compliant brief.¹ Rule 450(c) limits opening and opposition briefs to 14,000 words, but Taddonio's brief appeared to have exceeded 23,000 words.

On July 10, 2019, Taddonio filed a new brief.² Taddonio stated that the revised brief contained 16,595 words and requested that the Commission permit him to exceed the word limitation in Rule 450(c) and accept his brief due to the "size of the record," the "multiple allegations," and the "large number of basis for [his] appeal." Taddonio stated that he "worked diligently to reduce" the brief to its current length.

On July 11, 2019, FINRA moved to strike Taddonio's brief as overlong.³ FINRA also requested, alternatively if the Commission accepted Taddonio's brief, that FINRA be allowed to file an opposition brief not to exceed 16,000 words.

Requests to exceed word limitations are generally disfavored. Given the circumstances, however, we find it appropriate to grant Taddonio's request and accept his brief, and to grant FINRA's request to file an opposition brief not to exceed 16,000 words.⁴

¹ 17 C.F.R. § 201.450(c).

² Taddonio's brief was due by July 8, 2019. *Craig S. Taddonio*, Exchange Act Release No. 86306, 2019 WL 2870975 (July 3, 2019). Taddonio stated that he did not file his brief on time because he did not receive the order setting the due date until July 9, 2019.

³ FINRA contends that Taddonio's brief contains 17,671 words. In a reply, Taddonio stated that in counting 16,595 words he did not include two pages of case references.

Accordingly, IT IS ORDERED that the brief in support of the application for review be accepted and that FINRA be allowed to file an opposition brief not to exceed 16,000 words.

For the Commission, by its Secretary, pursuant to delegated authority.⁵

Vanessa A. Countryman
Secretary

⁴ See 17 C.F.R. §§ 201.161, .450(c).

⁵ 17 C.F.R. § 200.30-7(a)(4), (a)(5).