

July 18, 2022

Before The Securities and Exchange Commission

In the Matter of the Application of Bruce Zipper and Dakota Securities Intl. Inc.
For Review of Disciplinary Action Taken by FINRA

Adm. Proc. No. 3-20811

I believe this to be my last brief in this matter before the SEC. I am first going to respond to FINRA's last brief dated July 15, 2022. This brief was rather telling, and I would like to point out to the SEC, if you hadn't already noticed, that FINRA now chooses the words misidentify and misidentification on page 6 of their brief to describe Zipper's actions relating to using an improper rep code on his clients confirms. As you know FINRA previously used the words falsify and falsifying in describing Zipper's actions. The problem is all over the internet Zipper is accused of falsifying Dakota's books and records. This is a crime and a felony if guilty of such an offense. All one must do is Google Bruce Zipper, and you will find no less than 3 different lawyers soliciting clients to sue both Zipper and his firm, Dakota Securities Intl. for falsifying his records and books. FINRA by their actions has successfully ruined my reputation and ability to work forever.

Maybe FINRA after reading my last brief showing the SEC that not only did NOT falsify any books and records of Dakota Securities but did the opposite in doing everything possible to be totally TRANSPARENT in what I did. Unfortunately for me and my family the damage they caused is irreparable.

I now want to bring to the attention of the SEC some of FINRA's actions relating to this case. This case has now been going on for about 5 years in duration. I have repeatedly told the SEC and FINRA that I called my clients in this case to ask permission to use the rep code in question and got their permission to do so and a thank you to go with it as well. FINRA went to ask me no less than 4 times, two under oath, if I did call my clients and ask their permission in this matter. In all 4.

times I answered yes, I did. However, that wasn't enough for FINRA as they went behind my back and called each of these clients and asked them directly if Zipper did in fact call and ask their permission to use the rep code in question. Not only did my clients say yes, they did, but that still wasn't enough for FINRA. FINRA then goes on and proceeded to ask each client if they were aware of anything Zipper did do that, they weren't aware of. They continued asking questions till the point where my clients got outraged at FINRA, asking who the hell are they? And why are they calling them. My clients said they didn't appreciate the questions which they felt were way out of line and inappropriate trying to paint Zipper in the worst possible light. They went on to tell FINRA they had 100% confidence in Bruce Zipper and that confidence has been for over the last 30 years! They told FINRA that if they ever called them back, they would sue them for doing so in violating their rights of privacy without cause. FINRA never called another client of mine! I bring this up to the SEC currently because in the 5 years this case has been going on have you, SEC, ever once see FINRA bring this issue of Zipper asking his clients for permission to use the rep code in this matter up? I am asking, SEC, do you think this was relevant? Obviously FINRA thought it was relevant. Read what I just stated FINRA did. I said in all this time to the SEC that FINRA is biased in this case have been told, Bruce I hear what you are saying but I just don't see any bias. I think me going to my clients in this case and asking their permission to use the rep code in question is the MOST relevant part in this case. FINRA obviously did as well. Unfortunately, when they saw what I had said all along was in fact TRUE they had to do something. So, what does FINRA do. They scramble and try to find a way out. They post on their letter of July 24, 2019, on page 25 footnote 20 (copy provided previously) which they say, "hey SEC even if Zipper got permission from his clients to use the rep code in question, he is still guilty of falsifying his records to the State of New Jersey where he tried to avoid paying registration fees." Look at them SEC! this is the lie I keep telling you about. Knowing they had to say something that still says Zipper falsified his books and records they fall back to this. The LIE is that FINRA KNEW all along I withdrew from the State of New Jersey in December of 2015 and therefore didn't owe the State of New Jersey ANYTHING! But FINRA hoped if they bury this line far enough back in their brief and with a footnote at that, the SEC wouldn't know and wouldn't check to see if what they were saying is true. And they were RIGHT! The SEC never did check, never did ask and to this date still doesn't understand what FINRA did. Listen, I

and my family have been put in financial ruin from this case. I have been accused of something I never did. The least I had hoped for was that the SEC would at least investigate this matter THOROUGHLY! I think I am entitled to that. By God's Grace I still have an opportunity to state my case in another forum. I can't wait to go to Federal Court, in front of an unbiased judge, and state my case there. I will be there with my family, and with the clients called in this matter by FINRA who tell me they can't wait to let the judge know what FINRA is really like. You are going to find out SEC, that I have been right all along when the truth comes out in this case regarding the bias, hatred and venom FINRA has against Zipper. I know about the immunity of FINRA, but that immunity doesn't include lying and slander. We shall see what a judge thinks. Oh, in case you think that I won't be going to court. Please look at my file.

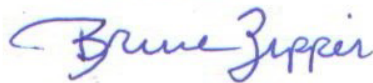
Here are the questions the SEC might ask FINRA if they are interested in who is lying and who is telling the truth.

1. Please FINRA send us a screenshot of Dakota Securities Intl state registrations in December of 2015. Please include any notifications from the State of New Jersey as to the withdrawal of Zipper and Dakota Securities from the State of New Jersey.
2. Dakota Securities entered all the orders in question in this case in the year 2016 as FINRA noted in its complaint against Dakota Securities. Well, if Dakota and Zipper withdrew their registration in December of 2015 how were these trades properly executed? FINRA, you know above everyone overseeing the broker dealer state registrations, an order can't be executed by a broker dealer without being registered there. The order automatically kicks out, correct? Please explain how all the orders in question got properly executed. (The answer SEC is that there is only one way that could have been done. And that is with an EXEMPTION!! You know the exemption FINRA knows nothing about! The exemption I told the SEC all along and FINRA questioned was given by FINRA!!

If the SEC ever did a real investigation in this matter of FINRA in that office in Boca Raton, your heads would explode from what you would find. For a starter just ask for an email search for the year 2016 from the FINRA office in Boca Raton with the name Zipper and see what happens. That would make some reading. Who

knows maybe a judge will let this case go forward and let me get discovery in this case against FINRA? I pray God gives me that opportunity. Lastly, I am asking the SEC to rule on the issue of Zipper falsifying his books and records in this matter. Please state if you agree with FINRA that I did or that Zipper in fact did not. You have been given enough facts and information to reach a conclusion in this matter. Thanks a lot for listening to me. Hopefully you might do some investigating in this case. It's just me and my family's life that's at stake.

Bruce Zipper



I am sending a copy of this brief to the FINRA office in Washington, D.C. to the attention of Michael Smith, the attorney of FINRA in this case