

**UNITED STATES OF AMERICA
BEFORE THE SECURITIES AND EXCHANGE COMMISSION**

In the Matter of the Application of
SUZANNE MARIE CAPELLINI

Admin. Proc. File No. 3-22284

For Review of Disciplinary Action Taken by
FINRA

MOTION FOR SUPPLEMENTAL BRIEFING

Suzanne Marie Capellini (“Capellini”) respectfully moves pursuant to 17 C.F.R. § 201.421(b) and § 201.450(a) for leave to submit a limited supplemental brief to alert the Commission to certain highly relevant case law decided since the parties submitted their original briefs over a year ago. As set forth in Capellini’s proposed Supplemental Brief, which is attached hereto as Exhibit A, these new authorities directly support Capellini’s arguments that: (1) FINRA’s exercise of Enforcement authority over her violated her Constitutional rights; and (2) FINRA’s resulting bar against Capellini working in the securities industry, which remains in effect pending this appeal, is causing and continues to cause her irreparable harm and must be immediately vacated as a result. The Commission has granted leave to file supplemental briefing in similar circumstances. *See, e.g., Ricky Alan Mantei*, Exchange Act Release No. 101385, at 1-2 (Oct. 18, 2024) (granting motion for supplemental briefing on issue of whether the Seventh Amendment’s jury trial requirement applied to FINRA disciplinary proceeding following the Supreme Court’s decision in *SEC v. Jarkesy*). Accordingly, Capellini respectfully requests that the Commission grant her leave to file the proposed supplemental brief attached hereto as Exhibit A.

Dated: April 10, 2026

Respectfully submitted,

/s/ Ian J. McLoughlin
Ian J. McLoughlin
SHAPIRO HABER & URMYY LLP
One Boston Place
Boston, MA 02108
Telephone: (617) 439-3939
Facsimile: (617) 439-0134
imcloughlin@shulaw.com

Counsel for Suzanne Capellini

CERTIFICATE OF SERVICE

I certify that on April 10, 2026, I served a copy of the foregoing by email on:

Attn: Celia Passaro
Office of General Counsel
FINRA
1700 K Street, N.W.
Washington, D.C. 20006
ersilia.passaro@finra.org
nac.casefilings@finra.org

/s/ Ian J. McLoughlin
Ian J. McLoughlin