

## UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549-4631

March 10, 2011

Mr. Douglas Roth Chief Financial Officer Aceto Corporation One Hollow Lane Lake Success, NY 11042

**Re:** Aceto Corporation

Form 10-K for the fiscal year ended June 30, 2010

Forms 10-Q for the periods ended September 30, 2010 and

**December 31, 2010** 

Form 8-K filed September 10, 2010

File No. 0-4217

Dear Mr. Roth:

We have reviewed your response letter dated March 7, 2011 and have the following comment. In our comment, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter within ten business days by providing the requested information or by advising us when you will provide the requested response. If you do not believe our comment applies to your facts and circumstances, please tell us why in your response.

After reviewing the information you provide in response to this comment, we may have additional comments.

## FORM 10-Q FOR THE PERIOD ENDED DECEMBER 31, 2010

## Condensed Consolidated Financial Statements

## Note 11 – Income Taxes, page 17

1. We note your response to comment five from our letter dated February 23, 2011. Please address the following so that we may more fully understand your accounting treatment:

Mr. Douglas Roth Aceto Corporation March 10, 2011 Page 2

- Tell us when you first entered into discussions with Rising Pharmaceuticals, Inc. regarding a possible acquisition;
- Tell us the date that you signed the Letter of Intent with Rising; and
- Explain, in detail, the circumstances surrounding your repatriation of \$6 million in June 2009.

You may contact Lisa Etheredge, Staff Accountant at (202) 551-3424 or the undersigned at (202) 551-3769 if you have questions.

Sincerely,

Rufus Decker Accounting Branch Chief