

132 Hope Street, Unit "1"
Stamford, CT 06906
May 20, 2015

The Honorable Cameron Elliott
Administrative Law Judge
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-2557
Via: U.S. Priority Mail



Re: Administrative Proceeding #3-15215 (James Tagliaferri)

Dear Judge Elliott:

I am the Respondent, proceeding pro se, in the aforementioned matter. I am writing to respectfully request the Court to lift the Stay on this action which has been in effect since March 11, 2013.

Simultaneously with the filing of the Securities & Exchange Commission Administrative Proceeding, a parallel criminal action was filed in Federal Court in the Southern District of New York (13-cr-115 (RA)). On March 8, 2013, the United States Attorney's office submitted an application to this Court for a Stay of the Administrative Proceeding. The application was granted by the Court.

Prior to the Stay becoming effective, on February 28, 2013, the Securities & Exchange Commission (the Commission), pursuant to Rule 230(a), agreed to make available documents collected by the Commission in its investigation of this matter. Immediately thereafter, citing the Stay, the Commission reversed course and refused to grant me access to the requested documents.

The Commission has relied on the Stay to withhold potentially, material exculpatory evidence from me. This evidence includes interviews with witnesses, results of an investigation by the Commission in 2008 of International Equine Acquisitions Holdings, Inc. and its subsidiaries and, a 2010 investigation of i3Archive, Inc. and its subsidiaries. To add insult to injury, an attorney employed by the Commission has actively participated in the criminal proceedings against me.

I was subsequently convicted on July 24, 2014 and sentenced on February 13, 2015. The restitution phase of the sentencing process is ongoing. On May 6, 2015, the Commission requested this Court to continue the Stay, citing "the still unresolved losses suffered by investors".

To continue to deny this Respondent's access to potentially, material exculpatory evidence is a clear violation of my right to Due Process and a clear violation of the Brady Rule. The denial of this evidence will prejudice the restitution phase of the sentencing process – as it did the criminal trial proceeding. Further, it will directly affect my appeal.

Based on the foregoing, I respectfully request the Court to lift the Stay on the Administrative Proceeding and to compel the Commission to provide this Respondent with all evidence it collected in its investigation of this matter.

I thank the Court for its consideration.

Respectfully submitted,

A handwritten signature in black ink, consisting of a small circle on the left and a long, sweeping horizontal line that curves upwards at the end.

James Tagliaferri, pro se
Respondent

Cc: BrownN@sec.gov (Attorney for the S.E.C., Division of Enforcement)
Via Email

UNITED STATES OF AMERICA
SECURITIES AND EXCHANGE COMMISSION

In the matter of:

File No. 3-15215

JAMES S. TAGLIAFERRI,
Respondent

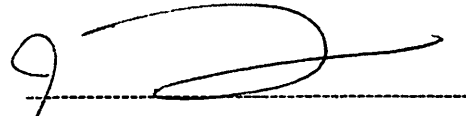
Honorable Cameron Elliott

AFFIRMATION OF SERVICE

I, James Tagliaferri, affirm I served a letter addressed to the Honorable Cameron Elliott, United States Securities and Exchange Commission Administrative Law Judge, dated May 20, 2015, upon the party listed below.

UNITED STATES SECURITIES AND EXCHANGE COMMISSION

NANCY A. BROWN, Esq.,
Attorney, Division of Enforcement, Securities and Exchange Commission
Via Email: BrownN@sec.gov



James Tagliaferri, pro se
Respondent