

UNITED STATES OF AMERICA
Before the
U.S. SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-15823

In the Matter of

VISIONARY TRADING LLC, et al.,

Respondents.

DIVISION OF ENFORCEMENT'S
REQUEST FOR EXTENSION OF TIME
TO FILE RESPONSE TO THE
MOTIONS OF RESPONDENTS
JOSEPH DONDERO AND EUGENE
GIAQUINTO TO VACATE FINAL
ORDER

The Division of Enforcement (“Division”) respectfully requests a 60-day extension, until September 19, 2025, to file its response to the motions of Respondents Joseph Dondero (“Dondero”) and Eugene Giaquinto (“Giaquinto”) (collectively, “Respondents”) to Vacate Final Order (“Motions”). The Division received Respondent Dondero’s Motion by e-mail on July 11, 2025, and Respondent Giaquinto’s Motion on July 14, 2025. Both Respondents mailed their respective Motions to the Office of the Secretary. A copy of the papers that the Division received is attached to this request. Thus, assuming that Commission Rule of Practice 201.154, 17 C.F.R. § 201.154, applies to the Motions, the Division’s response to Respondent Dondero’s Motion is currently due July 18, 2025, and its response to Giaquinto’s Motion is due July 21, 2025.¹ The Division has conferred with both *pro se* Respondents, who consent to this extension request.

¹ For the purpose of this extension request, the Division treats Respondents’ Motion as subject to Commission Rules of Practice. However, the Division reserves the right to assert that Respondents’ Motions are not properly before the Commission and/or to make any applicable jurisdictional argument.

Pursuant to Commission Rule 201.161, 17 C.F.R. § 201.161, good cause exists to extend the Division's time to respond to the Motions. Respondents' Motions apparently concern the Commission's April 14, 2014 settled Order Instituting Proceedings (the "Settled OIP"), which resolved all charges against Respondents in this case. Under the Settled OIP, Respondents agreed, among other things, to cease and desist from violating the charged securities laws and to pay disgorgement, prejudgment interest and a civil penalty.

In 2018, in order to enforce the Settled OIP's monetary remedies, the SEC obtained money judgments against each Respondent before the U.S. District Court for the District of New Jersey ("Judgments"). *See SEC v. Dondero*, 18-cv-14056, Dkt. No. 8 (D.N.J., Oct. 15, 2018); *SEC v. Gianquinto*, 18-cv-14057, Dkt. No. 10 (D.N.J., Oct. 15, 2018). After subsequent unsuccessful attempts to reach payment plans with Respondents, the Division referred collection to the U.S. Department of Treasury. Respondents now seek to vacate the April 2014 Settled OIP on various alleged constitutional and procedural grounds, and based on alleged financial and personal hardship.

Good cause exists for the Division's requested extension due to the age of this matter and its unusual procedural posture—which require the Division to review, among other things, the history of collection efforts in this case since 2014, and to carefully consider the jurisdictional issues presented. In addition, Division staff assigned to this matter have pre-arranged vacations scheduled during the first two weeks of August, and Respondents consent to this extension request.

For the foregoing reasons, the Division respectfully requests that the Commission enter an Order extending the Division's time to respond to the Motions by approximately 60 days, until September 19, 2025.

Dated: July 18, 2025

Respectfully Submitted,

s/ Ben Kuruvilla

Ben Kuruvilla

DIVISION OF ENFORCEMENT

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STATEMENT OF ELECTRONIC FILING AND CERTIFICATE OF SERVICE

I certify that on July 18, 2025, I caused to be filed the foregoing DIVISION OF ENFORCEMENT'S REQUEST FOR EXTENSION OF TIME TO FILE RESPONSE TO RESPONDENTS' MOTIONS TO VACATE FINAL ORDER with the Commission through the Office of the Secretary by the eFAP filing system, and further caused the same to be served on the following persons in the manner indicated:

By Electronic Mail:

Office of the Secretary

Securities and Exchange Commission

100 F Street, N.E.

Washington, D.C. 20549

APfilings@sec.gov

By Electronic Mail:

Joseph Dondero

[REDACTED]

Eugene Giaquinto

[REDACTED]

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