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HARD COPY

November 10, 2014

VIA EMAIL AND OVERNIGHT DELIVERY

The Honorable Cameron Elliot
Office of Administrative Law Judges
U.S. Securities and Exchange Commission
100 F Street, N.E.
Mail Stop 1090
Washington, D.C. 20549

RE: In the Matter of Jordan Peixoto, AP File No. 3-16184

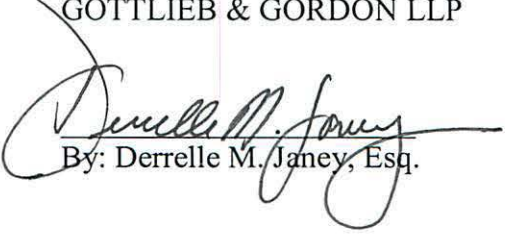
Dear Judge Elliot:

This law firm represents Respondent Jordan Peixoto in the above-referenced administrative proceeding.

Pursuant to discussion in today's initial prehearing conference call with the Division of Enforcement, please find enclosed a courtesy copy of the November 5, 2014 letter we previously filed with the Office of the Secretary, via overnight delivery.

Respectfully submitted,

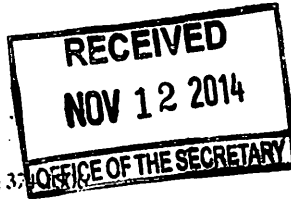
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November 5, 2014

VIA OVERNIGHT DELIVERY

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U.S. Securities and Exchange Commission
100 F Street, N.E.
Mail Stop 1090
Washington, D.C. 20549

RE: In the Matter of Jordan Peixoto, AP File No. 3-16184

Dear Judge Elliot:

This law firm represents Respondent Jordan Peixoto in the above-referenced administrative proceeding ("AP").

We write to inform Your Honor that, in connection with the above-referenced AP, Mr. Peixoto has commenced an action against the Securities and Exchange Commission (the "Commission") in the District Court for the Southern District of New York requesting injunctive and declaratory relief. *See Peixoto v. Securities and Exchange Commission*, Civil Case No. 1:14-cv-08364-WHP (S.D.N.Y.). Enclosed is a copy of the filed complaint and exhibits that we provide for background information about this matter, even though, in the first instance, the matters being litigated in the District Court action are not directly related to this proceeding.

We also wish to inform Your Honor that, on or before November 14, 2014, we intend file a motion to stay this AP, pursuant to the Commission's Rules of Practice Rules 400(d) and 401, in light of a pertinent and outstanding question of law currently before the Second Circuit. Specifically, the question of whether an alleged insider-trading tippee must have knowledge of the tipper's benefit is currently before the Second Circuit in *United States v. Newman*, No. 13-1837, and *United States v. Newman (Chiasson)*, No. 13-1917. *See also United States of America v. Newman (Steinberg)*, No. 14-2141 (granting motion to hold appeal in abeyance pending the disposition of *Newman* and *Chiasson*). Because the resolution of this question of law directly impacts the above-referenced AP, we will move Your Honor to stay the AP, pending the outcome of the Second Circuit's decision.

We have conferred with the Division of Enforcement ("Division") staff who have expressed that the Division will oppose the motion to stay.

Respectfully submitted,

GOTTLIEB & GORDON LLP


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