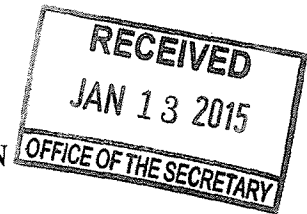




UNITED STATES  
**SECURITIES AND EXCHANGE COMMISSION**  
NEW YORK REGIONAL OFFICE  
200 VESEY STREET  
NEW YORK, NEW YORK 10281



January 12, 2015

**VIA UPS OVERNIGHT AND EMAIL**

Honorable Cameron Elliot  
Office of Administrative Law Judges  
U.S. Securities and Exchange Commission  
100 F Street NE, Mail Stop 2557  
Washington, DC 20549

Re: In the Matter of Vero Capital Management, LLC et al.  
A.P. File No. 3-16328

Dear Judge Elliot:

We write in connection with Chief Judge Murray's December 30, 2014 Order scheduling the hearing in this matter for February 2, 2015. The Division of Enforcement has conferred with Gregory Morvillo, counsel for Respondent Vero Capital Management, LLC, and the three individual Respondents, Messrs. Geiger, Barbaresi and Downey. The parties respectfully request that the hearing date be adjourned until May 4, 2015 or May 11, 2015, or some other date convenient to the Court and the parties. The parties currently anticipate that the hearing will take between one and two weeks. The Respondents agree to waive their right to hold a hearing between thirty and sixty days after service of notice of the proceedings under Securities Act Section 8A. See 15 U.S.C. § 77h-1(b).<sup>1</sup>

The parties also respectfully request that the hearing take place in New York City, at the offices of the Commission, since the attorneys, Respondents and many of the anticipated witnesses are located in the New York metropolitan area.

The parties also respectfully request that a telephonic prehearing conference be held on February 2, 2015, or some other date convenient to the Court.

Finally, the parties have agreed to the service of this and all future filings in this case by email.

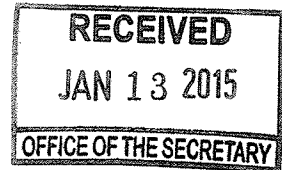
The undersigned has shown a copy of this letter to Mr. Morvillo and he assents to its filing on behalf of the Respondents.

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<sup>1</sup> Service of the OIP upon all Respondents has not yet been confirmed. The undersigned will notify the Court as soon as service has been completed.



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NEW YORK, NEW YORK 10281



January 12, 2015

**Via UPS Overnight**

Mr. Brent J. Fields, Secretary  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC 20549

Re: In the Matter of Vero Capital Management LLC, et al.  
A.P. File No. 3-16328

Dear Mr. Fields:

Enclosed please find the original and three copies of: (1) a letter dated January 12, 2015 addressed to Administrative Law Judge Cameron Elliot; (2) Notices of Appearance by Kevin P. McGrath and Mathew J. Watkins on behalf of the Division of Enforcement, in connection with the above-referenced matter.

Respectfully submitted,

  
Kevin P. McGrath

cc: Gregory Morvillo, Esq.  
Counsel for Respondents