

**RECEIVED**  
**APR 20 2015**  
**OFFICE OF THE SECRETARY**

UNITED STATES OF AMERICA  
BEFORE THE  
SECURITIES AND EXCHANGE COMMISSION

**Received**  
**APR 20 2015**  
**Office of Administrative  
Law Judges**

ADMINISTRATIVE PROCEEDING  
FILE NO. 3-16274

---

IN THE MATTER OF  
  
GREGORY VIOLA,  
Respondent.

---

Respondent Viola's Response to Division of Enforcement's Reply to Respondent Viola's Opposition to Enforcement's Motion for Summary Disposition.

Respondent has raised a genuine issue of material fact in his opposition to the Division of Enforcement's Motion for Summary Disposition.

The facts of Respondent's case for which this matter is based are in dispute.

The material question of fact about the predicates for the imposition of a bar are still to be contested in a retrial as no security violations have been proven to date.

Therefore, Respondent respectfully requests that the Court DENY the Division's Motion for Summary Disposition.

A. Respondent contests the predicates for the imposition of associational bans.

1. Respondent was duped into admitting any criminal conduct by a conspiratorial combination of AUSA Richard Schechter, defense counsel, a former boss of Schechter, Former United States Attorney for the District of Connecticut and now disbarred from

the practice of law, Harold Pickerstein, defense counsel Calvin Woo and defense counsel Russell Green.

Each statement in the Division's proposed findings of fact were based on an unsupported by a fact or evidence 2012 criminal information statement that Respondent totally rejects.

The actual facts are finally being uncovered by the United States Bankruptcy Court for the District of Connecticut.

The prosecution and defense team failed to abide by their oath taken and sworn to as officers of the court by subverting the actual truth.

There is no basis or standing for which this action could be raised as no proof of any security violations has been offered by the Securities and Exchange Commission.

2. Respondent's arguments in his opposition create a material question of fact regarding the applicability of 203(f) of the Investment Adviser's Act of 1940 and the appropriateness of sanctions.

- 1) Ineffective counsel Jonathan Einhorne admitted in Respondent's ("OIP") without fully advising Respondent of the declarations contained in that ("OIP").

2) As stated by the Respondent ad nauseum, Respondent's conviction on two counts of mail fraud was based on the perjury of the complainants that was suborned by FBI Agent Wendy Bowersox, AUSA Richard Schechter, and Respondent's defense team.

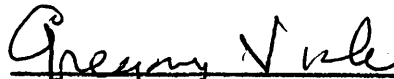
Therefore this Court lacks jurisdiction in this matter and if jurisdiction is assumed than the government's Motion for Summary Disposition must be denied.

CONCLUSION

For reasons stated above the Division's Motion for Summary Disposition must be dismissed and that this action be terminated with prejudice.

Respectfully submitted,

Date: April 10, 2015

  
\_\_\_\_\_  
GREGORY VIOLA  
P.O. Box 879  
Ayer, MA 01432

CERTIFICATE OF SERVICE

I certify that on April 10, 2015, a copy of the foregoing was mailed First Class U.S. Mail, post-paid, to:

Honorable Carol Fox Foelak  
100 F Street N.E.  
Washington, D.C. 20549-2557

Ellen Buber Moynihan  
U.S. Securities and Exchange Commission  
33 Arch Street, 23rd Floor  
Boston, MA 02110

  
\_\_\_\_\_  
GREGORY VIOLA