

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

Administrative Proceedings Rulings  
Release No. 5296 / December 6, 2017

Administrative Proceeding  
File No. 3-17104

In the Matter of

**BioElectronics Corp.,  
IBEX, LLC,  
St. John's, LLC,  
Andrew J. Whelan,  
Kelly A. Whelan, CPA, and  
Robert P. Bedwell, CPA**

**Notice to the Parties  
and Order Following  
Ratification**

The parties are notified of the Securities and Exchange Commission's order issued November 30, 2017. *Pending Admin. Proc.*, Securities Act of 1933 Release No. 10440, 2017 SEC LEXIS 3724, <https://www.sec.gov/litigation/opinions/2017/33-10440.pdf>. In that order, the Commission ratified the appointment of its administrative law judges and directed each judge to reconsider the record, including all substantive and procedural actions, in pending proceedings for which no initial decision has been issued and in those that are pending before the Commission following an initial decision. I issued an initial decision on December 13, 2016. The Commission granted Respondents' petition for review, but the Commission's ratification order remanded the proceeding to me for reconsideration.<sup>1</sup>

Each party may submit, by January 5, 2018, any new evidence it deems relevant to reexamination of the record. Each party may submit a brief explaining the relevance of its new evidence and identifying any challenged rulings, findings, or conclusions. The parties' briefs should also address the

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<sup>1</sup> Robert P. Bedwell, CPA, settled with the Commission and is no longer part of this proceeding. *BioElectronics Corp.*, Securities Exchange Act of 1934 Release No. 79176, 2016 SEC LEXIS 4034 (Oct. 27, 2016).

effect of any relevant changes to controlling law, including *Kokesh v. SEC*, 137 S. Ct. 1635 (2017). If any party chooses to submit a brief by January 5, all other parties will have until January 16, 2018, to file a responsive brief.

By February 16, 2018, I will issue an order upon reconsideration setting forth whether all prior actions taken by me are ratified or revised in any respect.

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Cameron Elliot  
Administrative Law Judge