

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

Administrative Proceedings Rulings  
Release No. 5464 / January 16, 2018

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**

**Order Denying Division's  
Motion for Extension of Time**

On January 12, 2018, the Division of Enforcement filed a letter addressing ratification and a motion requesting a twenty-one-day extension of the deadline for its response to Respondents' arguments about the failure of ratification to cure any defect in my appointment as administrative law judge. The Division's motion is DENIED. For reasons that will be explained in a future order, I do not find any merit in Respondents' ratification arguments as addressed to me. The Division may file a further response to Respondents' other arguments by January 19, 2018. The word limit of this further response is reduced from 3,000 by the number of words in the Division's January 12 letter.

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Cameron Elliot  
Administrative Law Judge