

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-9599

In the Matter of

JOHN GARDNER BLACK and
DEVON CAPITAL MANAGEMENT

**DIVISION OF ENFORCEMENT'S NOTICE OF
REPLY RECEIVED VIA EMAIL FROM RESPONDENT**

The Division of Enforcement ("Division") hereby files this Notice of Reply Received via Email from Respondent John Gardner Black ("Black") on July 22, 2025. The body of the email read, ".Response to Enforcement July 22" and attached the pdf, which is attached hereto as Attachment A. A second email received on July 22, 2025 had the subject line "Statement of Facts," the body of the email read, ".The add on in my prior filing failed to transpit (sic)" and attached a pdf titled, "Joint Stipulation of Facts," attached hereto as Attachment B.

The Division checked the docket in eFAP, and noted that the documents were not filed there. Notwithstanding Respondents lengthy history of improper service, as noted in the Commission's June 4, 2025 Briefing Order, the Division files this Notice in eFAP, attaching the "Response," as a courtesy.

July 22, 2025

Respectfully submitted,

DIVISION OF ENFORCEMENT
/s/ Judson T. Mihok

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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of July, 2025, under Commission Rules of Practice 150 and 151 (17 C.F.R. §§ 210.150 & 151), I served copies of the Division's Notice of Reply Received via Email, and Attachments A and B thereto, on the Securities and Exchange Commission Office of the Secretary by electronic mail to:

apfilings@sec.gov
secretarys-office@sec.gov

On this date, I also caused service of same on John Gardner Black by electronic mail and UPS service to:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

/s/ Judson T. Mihok
Judson T. Mihok