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

ADMINISTRATIVE PROCEEDINGS RULINGS Release No. 1811/September 16, 2014

ADMINISTRATIVE PROCEEDING File No. 3-15820

In the Matter of

DELSA U. THOMAS AND THE D. CHRISTOPHER CAPITAL MANAGEMENT GROUP, LLC ORDER FOLLOWING PREHEARING CONFERENCE

The Securities and Exchange Commission issued an Order Instituting Proceedings on April 2, 2014, pursuant to Sections 203(e) and 203(f) of the Investment Advisers Act of 1940 (Advisers Act) against Delsa U. Thomas (Thomas) and The D. Christopher Capital Management Group, LLC (DCCMG, and, collectively, Respondents).

On July 22, 2014, the Division of Enforcement (Division) filed its Motion for Summary Disposition (Motion). A telephonic prehearing conference was held on September 15, 2014, attended by Jessica Magee for the Division, and Thomas for Respondents. During the prehearing conference, I determined that supplemental briefing was necessary to conduct the analysis required by *Steadman v. SEC*, 603 F.2d 1126, 1140 (5th Cir. 1979), *aff'd on other grounds*, 450 U.S. 91 (1981). *See Don Warner Reinhard*, Exchange Act Release No. 61506, 2010 SEC LEXIS 1010, at *14 (Feb. 4, 2010).

Therefore, it is ORDERED that the parties shall file by Friday, October 17, 2014, supplemental briefing containing substantive information pertaining to the factors listed in *Steadman*. For now, no responses to this supplemental briefing will be necessary.

Cameron Elliot Administrative Law Judge