

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

ADMINISTRATIVE PROCEEDINGS RULINGS
Release No. 3561/February 1, 2016

ADMINISTRATIVE PROCEEDING
File No. 3-16801

In the Matter of

BENNETT GROUP FINANCIAL SERVICES, LLC, and
DAWN J. BENNETT

POST-HEARING ORDER

A hearing was held in this proceeding on January 27, 2016, and was expected to reconvene today in order to obtain the testimony of a witness. In the late afternoon on Friday, January 29, the Division of Enforcement informed my office that the witness was no longer available to testify today. By e-mail, I postponed today's hearing and ordered a telephonic conference held this morning. Today, before the telephonic conference, the witness e-mailed this office and expressed his unwillingness to submit himself for further testimony.

The Division of Enforcement, and no other party, attended today's telephonic conference. The Division explained that the witness's unwillingness to give testimony was unexpected and that it was prepared to file a motion, under Commission Rule of Practice 235, requesting that the witness's prior sworn statements be entered into the record. *See* 17 C.F.R. § 201.235(a)(4). The due date of such a motion is discussed below. I also granted the Division's request to admit Division Exhibit 85 into evidence. I then issued instructions, which are memorialized and supplemented here:

1. Electronic copies of all admitted exhibits should be provided to this office at the earliest convenience.
2. Motions to introduce prior sworn statements of witnesses under Commission Rule of Practice 235 should be filed by February 16, 2016.
3. Opening post-hearing briefs should be filed by March 2, 2016. Opening post-hearing briefs shall not exceed 14,000 words. Any responsive post-hearing briefs are due by March 16, 2016, and shall not exceed 7,000 words.
4. Proposed findings of fact and conclusions of law, consistent with 17 C.F.R. § 201.340, may be filed at the time opening post-hearing briefs are filed. Proposed findings of fact shall be numbered and must be supported by citations to specific portions of the record.

Each citation shall be accompanied by a quotation of the language that supports the proposed finding. Proposed conclusions of law shall be numbered and must be supported by citation to legal authority. Each citation shall be accompanied by a quotation of the language from the legal authority that supports the proposed conclusion. Argument in proposed findings and conclusions is not permitted. I will strike findings or conclusions that contain argument.

5. A list of admitted exhibits and exhibits offered but not admitted should be filed by March 2, 2016. This exhibit list should be in MS Excel or Word format and specify the exhibit number; description of the exhibit; Bates-stamp numbers, if any; and page(s) in the hearing transcript in which the exhibit was offered and admitted, if applicable. A courtesy copy of the exhibit list should be submitted to alj@sec.gov.

6. Copies of exhibits, both admitted and offered but not admitted, shall be filed in hardcopy with the Commission's Office of the Secretary, by March 2, 2016. *See* 17 C.F.R. §§ 201.350, .351.

James E. Grimes
Administrative Law Judge