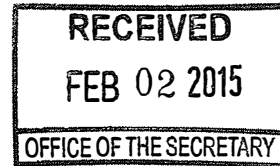


HARD COPY

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-15255

In the Matter of :
 :
 :
JOHN THOMAS CAPITAL MANAGEMENT :
GROUP, LLC, d/b/a PATRIOT28, LLC, :
 :
 :
GEORGE R. JARKESY JR., :
 :
 :
JOHN THOMAS FINANCIAL, INC., :
 :
 :
ANASTASIOS "TOMMY" BELESIS, :
 :
 :
Respondents. :



**THE DIVISION OF ENFORCEMENT'S RESPONSE
TO RESPONDENTS' MOTION FOR CLARIFICATION**

The Division of Enforcement ("Division") submits this response to the Emergency Motion for Clarification Regarding Order Directing Additional Submission and, in the Alternative, Motion for Authority to Exceed 16,000-Word Limit and for Additional Time filed by Respondents John Thomas Capital Management Group LLC d/b/a Patriot28 LLC and George R. Jarkesy, Jr. (collectively "Respondents").

Considering that Respondents apparently did not receive notice of the Commission's January 20, 2015 Order until a week after it was issued, the Division would not object to the Commission granting Respondents limited additional time to provide the additional two-column submission with citations to the record. Nor does the Division object to Respondents' request for additional words, although the Division notes that Respondents' claim that their opening brief contains 15,668 words is misleading given that Respondents filed several additional briefs,

including a Motion to Adduce Additional Evidence and a Motion for Recusal and Dismissal, which repeat the arguments that Respondents raise in their opening brief and which appear to be nothing more than an attempt to circumvent the Commission's word-count limits.¹ The Division notes, however, that because Respondents' supplemental filing will be the first time that Respondents provide a basis for their unsupported contentions that the ALJ made errors in her factual findings, much of the Division's work on its initial brief over the past several weeks will be rendered moot. Because the Division cannot start work on this portion of its response until it actually receives Respondents' supplemental filing, it believes that the following supplemental briefing schedule would be appropriate:

Respondents file their Supplemental Filing by February 13, 2015;
Division files its Principal and Response Brief by March 13, 2015;
Respondents file their Response and Reply Brief by April 6, 2015;
Division files its Reply Brief on April 20, 2015.²

Finally, should the Commission grant Respondents' request to enlarge the word count, the Division respectfully requests the same courtesy.

Dated: January 30, 2015

Respectfully submitted,



Todd D. Brody
Alix Biel
Attorneys for the Division of Enforcement
Securities and Exchange Commission
New York Regional Office
3 World Financial Center, 4th Floor
New York, NY 10281-1022
(212) 336-0080 (Brody)
brodyt@sec.gov
(212) 336-0028 (Biel)
biela@sec.gov

¹ Respondents' filing of these additional briefs was also contrary to the Commission's December 11, 2014 Scheduling Order, which explicitly stated that no additional briefs were to be filed without Commission leave. Nor does Respondents' word count take into consideration the direction in the December 11, 2014 Scheduling Order that the number of words shall "include[] any pleadings that are incorporated by reference."

² The dates for the filing of the two latter briefs are based on the number of days that the Commission previously provided the parties to submit these briefs.