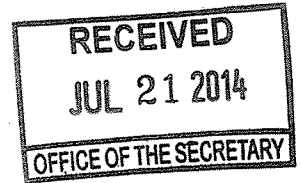


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-15820

In the Matter of	:	RESPONDENTS' ANSWER TO ORDER
	:	INSTITUTING ADMINISTRATIVE
	:	PROCEEDINGS PURSUANT TO
Delsa U. Thomas and	:	SECTIONS 203(e) and 203(f)
The D. Christopher Capital	:	OF THE INVESTMENT ADVISERS ACT
Management Group, LLC,	:	OF 1940 AND NOTICE OF HEARING
	:	RULES OF PRACTICE
Respondents.	:	

**ANSWER OF RESPONDENTS DELSA U. THOMAS AND
THE D. CHRISTOPHER CAPITAL MANAGEMENT GROUP, LLC**

COME NOW Respondents Delsa U. Thomas (“Thomas”) and The D. Christopher Capital Management Group, LLC (“Christopher Capital”) (collectively, the “Respondents”), and file this Answer to the Order Instituting Administrative Proceedings Pursuant to Sections 203(3) and 203(f) of the Investment Advisers Act of 1940 and Notice of Hearing (“OIP”) and, pursuant to 17 C.F.R. § 201.220, answer as follows:

I.
ANSWER

RESPONDENTS

1. Respondents admit the allegations contained in Paragraph 1 of the OIP.¹
2. Respondents admit the allegations contained in Paragraph 2 of the OIP except as follows: Respondents deny that The D. Christopher Capital Management Group, LLC was registered with the Commission as an investment adviser in June 2011, but rather was registered in September 2011.

¹ Answers in each subsection correspond with the numbering scheme in the OIP.

ENTRY OF PERMANENT INJUNCTIONS AGAINST RESPONDENTS

3. Respondents deny that a final judgment was entered against them on March 4, 2013 in *Securities and Exchange Commission v. Delsa U. Thomas, The D. Christopher Capital Management Group, LLC, and The Solomon Fund, LP*, Case No. 3:13-CV-739-L, in the United States District Court for the Northern District of Texas, Dallas Division (“the SEC Action”).

4. The existence of and allegations set forth in the SEC Action are a matter of public record and within the personal knowledge of the Commission; therefore, Respondents object that this paragraph requires a response from them or, alternatively, state that the allegations in Paragraph 4 of the OIP contain legal conclusions and/or questions for the Court to decide, and therefore are allegations to which no responsive pleading is required. To the extent a responsive pleading is required to the allegations contained in Paragraph 4 of the OIP, Respondents admit the allegations contained in the first sentence of Paragraph 4, namely, the content of the allegations made by the Commission in the SEC Action. Respondents deny the truth of those allegations. Respondents deny the allegations contained in the second sentence of Paragraph 4 of the OIP.

5. The existence of and allegations set forth in the SEC Action are a matter of public record and within the personal knowledge of the Commission; therefore, Respondents object that this paragraph requires a response from them or, alternatively, state that the allegations in Paragraph 5 of the OIP contain legal conclusions and/or questions for the Court to decide, and therefore are allegations to which no responsive pleading is required. To the extent a responsive pleading is required to the allegations contained in Paragraph 5 of the OIP, Respondents admit the allegations contained in Paragraph 5, namely, the content of the allegations made by the Commission in the SEC Action. Respondents deny the truth of those allegations.

6. The allegations in Section III.A – C of the OIP contain legal conclusions and/or questions for the Court to decide, and therefore are allegations to which no responsive pleading is required. Alternatively, Respondents lack sufficient information to admit or deny the allegations.

7. The allegations in Section IV of the OIP contain legal conclusions and/or questions for the Court to decide, and therefore are allegations to which no responsive pleading is required. Alternatively, Respondents lack sufficient information to admit or deny the allegations.

II. **RESERVATION**

1. Respondents reserve the right to supplement and amend this Answer as necessary and appropriate.

2. Respondents reserve the right to add counterclaims at a later time with Court authority.

3. To the extent any allegation is not specifically addressed herein, such allegation is denied.

4. Respondents demand strict proof of all allegations made in the OIP.

III. **CONCLUSION**

Respondents request that the Securities and Exchange Commission's request for public administrative proceedings be denied.

SIGNED this 14th day of July, 2014.

Respectfully submitted,



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