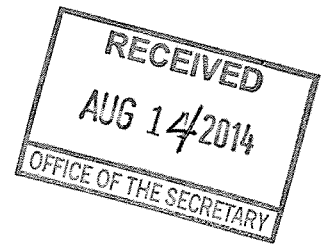


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-15820

In the Matter of	:	RESPONSE IN OPPOSITION OF DIVISION
	:	OF ENFORCEMENT'S MOTION FOR
Delsa U. Thomas and	:	SUMMARY DISPOSITION AND BRIEF
The D. Christopher Capital	:	IN SUPPORT
Management Group, LLC,	:	
	:	
Respondents.	:	

RESPONSE IN OPPOSITION TO DIVISION OF ENFORCEMENT'S MOTION FOR
SUMMARY DISPOSITION AND BRIEF IN SUPPORT

Respondents Delsa U. Thomas ("Thomas") and The D. Christopher Capital Management Group, LLC ("DCCMG") (collectively, the "Respondents") file this Response in Opposition to the Motion for Summary Disposition and Brief in Support (the "Motion") filed by the Division of Enforcement of the United States Securities and Exchange Commission (the "Commission") as follows:

I.
INTRODUCTION AND SUMMARY OF ARGUMENT

Respondents acknowledge that the United States District Court for the Northern District of Texas ("District Court") entered a final judgment against Respondents, by default, on March 4, 2014 in SEC v. Delsa U. Thomas, et al., Case No. 3:13-CV-00739-L. However, Respondents disagree with the Commission's contention that they violated Section 17(a) of the Securities Act of 1933 ("Securities Act") [15 U.S.C. 77q(a)] and Section 10(b) of the Securities Exchange Act of 1934 ("Exchange Act") and Rule 10b-5 thereunder [15 U.S.C. 78j(b)], 17 C.F.R 240.10b-5] and Section 203A of the Investment Advisers Act of 1940 ("Advisers Act") [15 U.S.C. 80b-3a]

and Respondents also disagree and deny the Commission's contention that they aided and abetted in violations of Sections 206(1), (2), and (4) of the Adviser's Act and Rule 206(4)-8 thereunder [15 U.S.C. 80b-6(1), (2), (4); 17 C.F.R. 275.206(4)-8]. Based on Respondents position on this matter, a Motion to Vacate Default Judgment has been filed with the United States District Court, Northern District of Texas as of August 14, 2014. With this Motion on record, we respond in opposition of the Division of Enforcement's Motion for Summary Disposition and In Brief in Support and request that this Motion be denied.

II.
MOTION TO VACATE DEFAULT JUDGMENT FILED

A. A Motion to Vacate Default Judgment filed August 14, 2014.

The District Court granted a default against Respondents on March 4, 2014. On August 14, 2014 at 11:11 am Central Standard Time, at the United States District Court, Northern District of Texas, Dallas Division, a Motion to Vacate Default Judgment was filed. Respondents oppose a ruling for the Division of Enforcement's Motion for Summary Disposition and Brief in Support at this time and request that the Division of Enforcement's Motion for Summary Disposition and Brief in Support be denied until such time that the United States District Court renders a decision to Respondents Motion to Vacate Default Judgment.

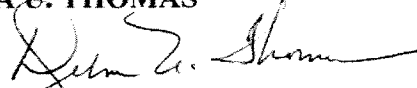
III.
CONCLUSION

With no decision to the Respondents Motion to Vacate Default Judgment yet rendered, the Commission's Enforcement Motion For Summary Disposition of this matter should be denied.

Signed this 14th day of August 2014.

Respectfully submitted,

DELSA U. THOMAS



By: /s/ Delsa U. Thomas

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FOR RESPONDENTS

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CHRISTOPHER CAPITAL MANAGEMENT
GROUP, LLC**