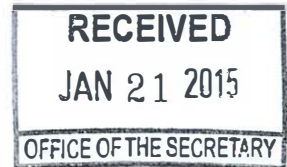


ORIGINAL

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

HARD COPY

ADMINISTRATIVE PROCEEDING
File No. 3-16047



In the Matter of

**THE ROBARE GROUP, LTD.,
MARK L. ROBARE, AND JACK
L. JONES JR.,**

Respondents.

**DIVISION OF ENFORCEMENT'S
OBJECTIONS RESPONDENTS'
WITNESSES**

Pursuant to the Order Setting Prehearing Schedule and General Prehearing Order, dated October 7, 2014, the Division of Enforcement ("Division") submits this Objections to Respondents' Witnesses:

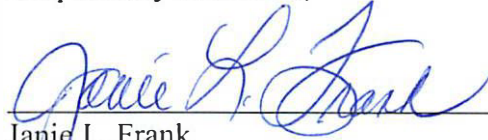
1. The Division objects to the Respondents' expert witness, Miriam Lefkowitz, on the grounds that she is not qualified to testify as an expert witness under Rule 702 of the Federal Rules of Evidence. She does not possess specialized knowledge, experience, skill, expertise, training or education such that she could assist the trier of fact in understanding the evidence or in determining a fact issue.

2. The Division further objects to Respondents' expert witness, Miriam Lefkowitz, on the grounds that her expert report contains proffered opinions on irrelevant issues, including but not limited to whether Respondents' disclosures were "in-line" with other investment advisers, whether the disclosures would likely mislead their clients, whether their effort in drafting the disclosures matched or exceeded the efforts of other investment advisers, whether the Form ADV is difficult to complete, and whether the Commission offers unclear or

conflicting advice to fill out the form.

Dated: January 20, 2015.

Respectfully submitted,



Janie L. Frank

Texas Bar No. [REDACTED]

Jessica Magee

Texas Bar No. [REDACTED]

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