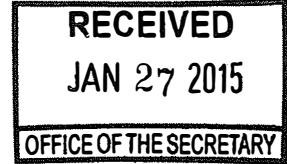


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UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



In the Matter of:

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

Respondents.

ADMINISTRATIVE PROCEEDING
File No. 3-16047

**RESPONDENTS' RESPONSE TO THE
DIVISION'S OBJECTIONS**

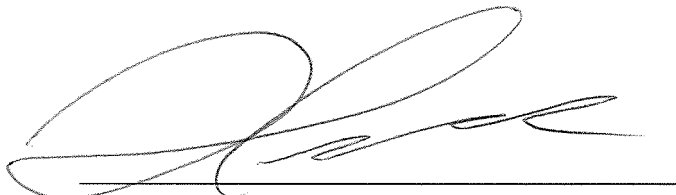
Respondents Robare Group, LTD, Mark L. Robare, and Jack L. Jones, Jr. (collectively, the "Respondents"), by and through their attorneys, hereby submit the following response to the Division of Enforcement's Objections to Respondent's Exhibits:

On January 20, 2015, the Division served Respondents with its objections to certain of Respondents of exhibits. No authority or argument was presented in support of those objections, making a response by Respondents impossible. Nevertheless, Respondents expressly reserve their right to present contrary authority or argument in response to the Division's objections during the hearing (or any other time and place the Court deems proper).

Respondents also objected to the testimony by Respondents' expert witness, Miriam Lefkowitz. Respondents' response to those objections is presented, in full, in their Opposition to the Division's Motion *in Limine*, filed contemporaneously herewith.

Respectfully submitted this 26th day of January, 2015.

ULMER & BERNE LLP

A handwritten signature in black ink, appearing to read 'Alan M. Wolper', written over a horizontal line.

Alan M. Wolper

[REDACTED]
Heidi VonderHeide

[REDACTED]
500 West Madison Street, Suite 3600
Chicago, Illinois 60661

[REDACTED]
[REDACTED]
Counsel for Respondents

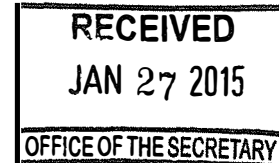
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ATTORNEYS

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associate attorney
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direct fax 312.658.6513
hvonderheide@ulmer.com

January 26, 2015

VIA ELECTRONIC MAIL
& EXPRESS OVERNIGHT DELIVERY



Honorable James E. Grimes
Chief Administrative Law Judge
Securities and Exchange Commission
100 F Street, N.E.
Washington, DC 20549-2557
ALJ@sec.gov

Re: In the Matter of The Robare Group, Ltd., et al.
AP File No. 3-16047

Dear Honorable Judge Grimes:

Enclosed please find Respondents' Response to the Division's Objections in connection with the referenced matter.

Should you have any questions please do not hesitate to contact me.

Very truly yours,

Heidi E. VonderHeide

HEV:ah
Enclosure

cc: Office of the Secretary (via facsimile transmission and express overnight delivery)
Janie L. Frank (via facsimile transmission and express overnight delivery)
Jessica B. Magee (via facsimile transmission, e-mail, and express overnight delivery)

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