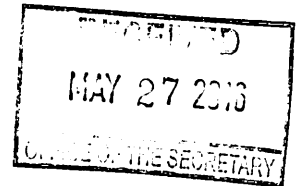


UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION



**SECURITIES ACT OF 1933**  
Release No. 10036 / February 5, 2016

**SECURITIES EXCHANGE ACT OF 1934**  
Release No. 77073 / February 5, 2016

**ACCOUNTING AND AUDITING ENFORCEMENT**  
Release No. 3740 / February 5, 2016

**ADMINISTRATIVE PROCEEDING**  
File No. 3-17104

**In the Matter of**

**BioElectronics Corp.,  
IBEX, LLC,  
St. John's, LLC,  
Andrew J. Whelan  
Kelly A. Whelan, CPA, and  
Robert P. Bedwell, CPA,**

**Respondents.**

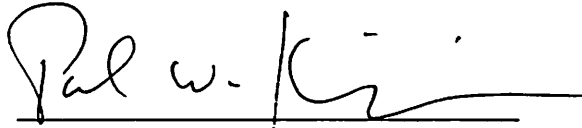
**DIVISION OF ENFORCEMENT'S  
MOTION FOR PARTIAL SUMMARY  
DISPOSITION AGAINST  
BIOELECTRONICS CORP.**

The Division of Enforcement (“Division”), pursuant to Rule 250 of the Commission’s Rules of Practice, moves for an order of summary disposition on the non-scienter based reporting violation claims raised against respondent BioElectronics Corp. (“BioElectronics or BIEL”). As there is no genuine issue with regard to any material fact, the Division is entitled to summary disposition as a matter of law on its claims against BIEL for violating Section 13(a) of the Securities and Exchange Act of 1934 (“Exchange Act”) [15 U.S.C. § 78m(a)], and Rule 13a-1 thereunder [C.F.R. 240.13a-1].

In support of this Motion, the Division relies upon the accompanying Memorandum of Law and exhibits attached thereto. The Division respectfully requests that the Court grant this motion.

Dated: May 27, 2016

Respectfully submitted,



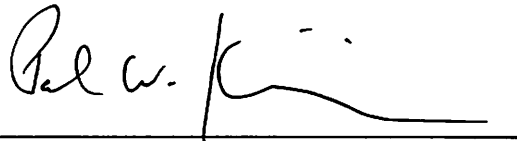
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COUNSEL FOR THE DIVISION  
OF ENFORCEMENT

**Certificate of Service**

I declare that on May 27, 2016, the foregoing was served upon counsel to the respondents  
by electronic mail, per agreement of the parties, at the following addresses:

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Paul W. Kisslinger