

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**  
**August 3, 2005**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-12003**

**In the Matter of**

**J. ROBERT DOBBINS,**

**Respondent.**

**ORDER INSTITUTING ADMINISTRATIVE  
PROCEEDINGS PURSUANT TO SECTION  
203(f) OF THE INVESTMENT ADVISERS  
ACT OF 1940 AND NOTICE OF HEARING**

**I.**

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against J. Robert Dobbins (“Respondent” or “Dobbins”).

**II.**

After an investigation, the Division of Enforcement alleges that:

A. RESPONDENT

From at least January 1, 2000 to 2003, Respondent J. Robert Dobbins, who resides in Dallas, Texas, was the owner of and controlled two unregistered hedge funds and managed the hedge funds through two unregistered investment advisers. Dobbins received compensation for advising and managing clients’ investments.

B. ENTRY OF THE INJUNCTION

1. On July 12, 2005, a final judgment was entered by consent against Dobbins, permanently enjoining him from future violations of Section 17(a) of the Securities Act of 1933, Section 10(b) of the Securities Exchange Act of 1934, and Rule 10b-5 thereunder; and Section 206 (1) and (2) of the Investment Advisers Act in the civil action entitled *Securities and Exchange Commission v. J. Robert Dobbins, et al.*, Civil Action Number 3:04CV605H, in the United States District Court for the Northern District of Texas. The judgment included orders that Dobbins pay civil money penalties and disgorgement pursuant to Section 206 of the Advisers Act.

2. The Commission's complaint alleged that from January 1, 2000 to 2003, Respondent J. Robert Dobbins, who resides in Dallas, Texas, was the owner of and controlled two unregistered hedge funds: Dobbins Partners L.P. and Dobbins Offshore Ltd. (collectively referred to as "Dobbins Hedge Funds"); Dobbins managed the Dobbins Hedge Funds through two unregistered investment advisers: Dobbins Capital Corp. which acted as the investment adviser for Dobbins Partners, and Dobbins Offshore Capital, LLC which acted as the investment adviser for Dobbins Offshore (collectively referred to as "Dobbins Investment Advisers"). The complaint also alleged that while Dobbins, Dobbins Capital, and Dobbins Offshore Capital were not registered as investment advisers, they received compensation for advising and managing clients' investments.

**III.**

In view of the allegations made by the Division of Enforcement, the Commission deems it necessary and appropriate in the public interest that public administrative proceedings be instituted to determine:

A. Whether the allegations set forth in Section II are true and, in connection therewith, to afford Respondent an opportunity to establish any defenses to such allegations; and

B. What, if any, remedial action is appropriate in the public interest against Respondent pursuant to Section 203(f) of the Advisers Act.

**IV.**

IT IS ORDERED that a public hearing for the purpose of taking evidence on the questions set forth in Section III hereof shall be convened at a time and place to be fixed, and before an Administrative Law Judge to be designated by further order as provided by Rule 110 of the Commission's Rules of Practice, 17 C.F.R. § 201.110.

IT IS FURTHER ORDERED that Respondent shall file an Answer to the allegations contained in this Order within twenty (20) days after service of this Order, as provided by Rule 220 of the Commission's Rules of Practice, 17 C.F.R. § 201.220.

If Respondent fails to file the directed answer, or fails to appear at a hearing after being duly notified, the Respondent may be deemed in default and the proceedings may be determined against him upon consideration of this Order, the allegations of which may be deemed to be true as provided by Rules 155(a), 220(f), 221(f) and 310 of the Commission's Rules of Practice, 17 C.F.R. §§ 201.155(a), 201.220(f), 221(f) and 201.310.

This Order shall be served forthwith upon Respondent personally or by certified mail.

IT IS FURTHER ORDERED that the Administrative Law Judge shall issue an initial decision no later than 210 days from the date of service of this Order, pursuant to Rule 360(a)(2) of the Commission's Rules of Practice.

In the absence of an appropriate waiver, no officer or employee of the Commission engaged in the performance of investigative or prosecuting functions in this or any factually related proceeding will be permitted to participate or advise in the decision of this matter, except as witness or counsel in proceedings held pursuant to notice. Since this proceeding is not "rule making" within the meaning of Section 551 of the Administrative Procedure Act, it is not deemed subject to the provisions of Section 553 delaying the effective date of any final Commission action.

For the Commission, by its Secretary, pursuant to delegated authority.

Jonathan G. Katz  
Secretary