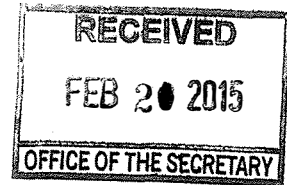


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-15255

In the Matter of :
 :
 :
JOHN THOMAS CAPITAL MANAGEMENT :
GROUP, LLC, d/b/a PATRIOT28, LLC, :
 :
 :
GEORGE R. JARKESY JR., :
 :
 :
JOHN THOMAS FINANCIAL, INC., :
 :
 :
ANASTASIOS "TOMMY" BELESIS, :
 :
 :
Respondents. :

**THE DIVISION OF ENFORCEMENT'S MOTION FOR
ADDITIONAL WORDS TO RESPOND TO RESPONDENTS'
FOUR BRIEFS AND SUPPLEMENTAL SUBMISSION**

The Division of Enforcement ("Division") submits this motion requesting additional words to respond to the multiple briefs and to the supplemental submission filed by Respondents John Thomas Capital Management Group LLC d/b/a Patriot28 LLC and George R. Jarkesy, Jr. (collectively "Respondents").

The Commission's December 11, 2014 Order Granting Review and Scheduling Briefs provided that Respondents shall file a single consolidated brief not to exceed 16,000 words, and that the Division's principal and response brief shall also not exceed 16,000 words. The order also provided that "no briefs in addition to those specified in this schedule may be filed without leave of the Commission."

On January 13, 2015, contrary to the Commission's explicit order, Respondents filed four *briefs*: (1) an opening brief; (2) a motion to stay; (3) a motion to adduce additional evidence; and

(4) a motion for recusal and dismissal of the administrative proceeding. Respondents did not seek leave of the Commission to file the additional briefs. In the aggregate, the number of words in Respondents' four briefs well-exceeded the 16,000 words granted to them.

On January 20, 2016, the Commission ordered Respondents to file an additional submission because Respondents had failed to comply with Rule 450(b). In response to the Commission's order, Respondents filed an emergency motion for clarification seeking, among other things, additional words beyond the 16,000 allotted to them. The Division did not oppose this motion, but requested that "should the Commission grant Respondents' request to enlarge the word count, the Division requests the same courtesy." On January 30, 2015, the Commission issued an order granting Respondents' motion and stating that the supplemental submission did not need to be within the 16,000 word limit. The Order did not address the excessive word count in the Respondents' prior submissions or the Division's request for an additional word count should Respondents' motion be granted.

In light of the fact that the Division now is responding to all five of Respondents' submissions in a single brief, the Division respectfully requests that it receive an enlargement of the originally-ordered word count to match the length of verbiage submitted by the Respondents. In addition, the Division proposes providing the Commission with a spreadsheet (similar to Respondents' supplemental submission) that would offer the Commission the record evidence supporting the contested findings of fact (Respondents' Exceptions #26-72 in their supplemental submission) and demonstrating that the record evidence cited by Respondents does not in any way undermine the ALJ's findings. Such spreadsheet would incorporate the Respondents' supplemental submission and provide the Commission record citations in a single, consolidated document.

Dated: February 20, 2015

Respectfully submitted,



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