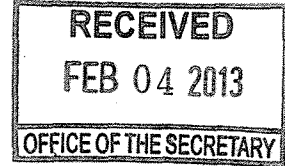


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UNITED STATES OF AMERICA
BEFORE THE SECURITIES AND EXCHANGE COMMISSION

Administrative Proceeding File No. 3-15124

In the Matter of :
:
David Bandimere :
and John O. Young. :

JOHN YOUNG'S
ANSWER

Shaun Kaufman of Shaun Kaufman Law, P.C., now submits John Young's response to the Commission's Order Instituting Administrative and Cease and Desist Proceedings (hereafter "Order"). In support:

RESPONSE TO SUMMARY ALLEGATIONS

1. John Young denies that he was acting as an unregistered broker between 2007 and 2010 for the "Dalton Scheme". Rather, he was a victim of Dalton's dishonest and deceptive plans. He was an investor in these plans, placing thousands of his own money in the program. He denies, specifically, that he received \$400,000 (or any amount) in transaction based compensation from Dalton's two programs, UCR and IV Capital. He further denies that he made "numerous misrepresentations" about his role in the program, specifically that he was a partner in the UCR program to potential investors. Young denies making false assertions about whether he and his family had invested in UCR. In short, he denies violating Section 17(a) of the Securities Act and Sections 10(b) and 15(a) of the Exchange Act, including Rule 10b-5. Young denies that he violated Section 5 of the Securities Act by selling unregistered securities in UCR and IV Capital, or anything at all within the Bandimere LLC's.

2. Young agrees that the schemes denominated above as UCR and IV were Ponzi schemes, but denies that he had any knowledge that they were such until after they collapsed, when his funds were lost. Young denies selling unregistered securities to third parties in the absence of an exemption to the registration requirements.

RESPONSE TO DENOMINATION OF RESPONDENTS

3. Young is without sufficient information to form a belief as to the truth of the allegations in paragraph 5 of the Order and therefore denies the same.

4. Young admits all of the allegations contained in paragraph 6 of the Order with the exception of the allegation that he was an unregistered broker selling the IV Capital and UCR investments.

RESPONSE TO SECTION C, OTHER RELEVANT ENTITIES AND INDIVIDUALS

5. Young is without sufficient information to form a belief as to the truth of the allegations in paragraphs 7, 8, 9, 10, 11, 12, 13 and 14 of Section C of the Order and therefore denies the same.

RESPONSE TO SECTION D-THE BACKGROUND ON ALLEGED SCHEMES

6. Young denies being paid for bringing new investors to Larry Parrish's investment plans. He is without sufficient information to form a belief as to the veracity of the balance of the averments contained in paragraph 15 of the Order and therefore denies the same.

7. Young admits the allegations of paragraph 16 of the Order which are based in public record, but denies any legal conclusions contained therein.

8. Young denies that he was paid for "bringing in new investors" to Dalton's schemes. Young affirmatively states that he was a victim of Dalton's schemes and plans. Young is without sufficient information to form a belief as to the truth of the balance of paragraph 17, and therefore denies same.

9. Young admits the allegations in paragraph 18 as they are set forth in public record, but denies any legal conclusions set forth therein.

RESPONSE TO SECTION E, BANDIMERE/BACKGROUND

10. Young is without sufficient information to form a belief of the allegations contained in paragraphs 19, 20, 21, 22, 23, 24, 25, 26, 27, 28 and 29 of the Order, and therefore denies the same.

RESPONSE TO SECTION E, BANDIMERE AS BROKER

11. Young is without sufficient information so as to form a belief as to the veracity of the allegations contained in paragraphs 30, 31, 32 and 33 of the Order, and therefore denies the same.

RESPONSE TO SECTION E, BANDIMERE, MISLEADING AND FRAUDULENT ACTS

12. Young is without sufficient information to form a belief as to the truth of paragraphs 34, 35, 36, 37 and 38 of the Order and therefore denies the same.

RESPONSE TO SECTION F, YOUNG, BACKGROUND

13. Young admits that Dalton introduced him to Parrish in 2005, and that he advised other parties about the existence of the investment program. He also admits having been a casual acquaintance of Dalton for many years before his investment scheme defrauded himself and

many others. He admits to undertaking certain administrative tasks on behalf of Parrish's program but Young denies the balance of the allegations not expressly admitted in paragraphs 39 and 40 of the Order.

RESPONSE TO SECTION F, YOUNG AS UNREGISTERED BROKER

14. Young admits to advising other people as to the existence of the IV Capital and UCR Trading Programs between 2007 and 2010. Young can only deny the balance of the averments contained in paragraph 41 of the Order until he reviews specific items of evidence.

15. Young admits that he described to others how his personal investments with UCR and IV Capital in an anecdotal and not entrepreneurial sense as set forth in paragraph 42 of the Order. He admits handling certain administrative tasks (uncompensated) for the respective entities, but denies the balance of the allegations contained in paragraph 42 of the Order.

16. Young admits that many investors sent their money directly to UCR, and that they received their payments directly from that entity. Young denies the balance of the allegations in paragraph 43 of the Order.

17. Young admits to receiving payments for clerical and administrative work from Dalton, as alleged in paragraph 44 of the Order, but denies the averments contained therein otherwise.

RESPONSE TO SECTION F, MISREPRESENTATIONS BY YOUNG

18. As stated above, Mr. Young discussed his investments with certain family members and friends. He told certain investors that Dalton had been in the investment business many years, and that he was affiliated with other businesses at least that long, but denies telling them that UCR had been in existence 7-9 years. He told many people that he and his wife had invested in the program (to the extent that she is considered a family member of his) but Young denies the balance of the averments contained in paragraph 45.

19. Young denies that he made any material misrepresentations, other than those he truly believed in because he was an investor in a plan which later defrauded and victimized him.

20. Young denies that his representations to others were critical in their decision to work with Dalton and UCR, although he did tell others that he had invested his own money therein as set forth in paragraph 15, infra.. To the extent that there are other allegations contained in paragraph 46 of the Order, they are denied.

21. Young is without sufficient information to form a belief as to the veracity of the averments in paragraph 47 of the Order, and denies the same.

RESPONSE TO VIOLATIONS SECTION

22. As they concern Bandimere, Young is without sufficient information and belief to form an opinion as to the veracity of paragraph 48, 49 and 50 and therefore denies same. As they concern him, Young denies the balance of the averments in paragraphs 48, 49, and 50.

23. The allegations of paragraph 51 concern Bandimere but to the extent Young is implicated therein, he denies the allegations therein.

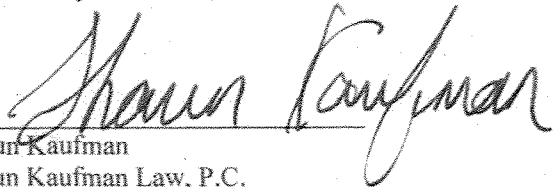
AFFIRMATIVE DEFENSES

24. The Order is subject to dismissal because it:

- a. Is barred by estoppel, laches and waiver;
- b. Includes acts which are outside of the Limitation of Actions (five years);
- c. Invokes the Dodd-Frank act, which did not take effect until after certain acts were undertaken herein;
- d. Violates the Equal Protection Clause of the United States Constitution by using administrative, rather than injunctive relief, prejudicing Respondent's rights to access to the Courts, and his Due Process Rights;
- e. Fails to make a definite statement as to what acts that Young engaged in were fraudulent pursuant to Section 17(a), Securities Act and Section 10b-5 of the same.

Dated this 18th day of January, 2013.

Respectfully Submitted,



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