

**UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION**

ADMINISTRATIVE PROCEEDING

File No. 3-16316

In the Matter of

PAUL J. POLLACK and

MONTGOMERY STREET

RESEARCH, LLC

Respondents.

ANSWER OF RESPONDENTS

PAUL J. POLLACK AND

MONTGOMERY STREET

RESEARCH, LLC

I.

Respondents deny that the action is appropriate and in the public interest because, among other reasons, this action has been brought illegally in a Commission Administrative Proceeding for which no legal basis therefore exists. Only the United States District Court sitting for the District of Arizona has exclusive *in personam* and *in res* jurisdiction to hear the Commission's Complaints.

II.

1. Respondents deny the allegations in Paragraph 1.
2. Respondents deny the allegations in Paragraph 2.
3. Respondent Pollack admits the allegations in Paragraph 3, except that Respondent Pollack is without information or knowledge to either admit or deny the allegations in the

last sentence of Paragraph 3, i e, Respondent Pollack asserts that "participated in an offering" of penny stock is overly broad, ambiguous and undefined by the Division for purposes of Paragraph 3, and therefore denies the last sentence of Paragraph 3.

4. Respondent Montgomery Street adopts the response of Respondent Pollack for Paragraph 4.

5. Respondents admit the allegations in Paragraph 5, except Respondents deny the allegations in the second sentence of Paragraph 5.

6. Respondents admit the allegations in Paragraph 6, except Respondents deny the allegations in the second sentence of Paragraph 6.

7. Respondents admit the allegations in Paragraph 7, except Respondents deny the allegations in the second sentence of Paragraph 7.

8. Respondents admit the allegations in Paragraph 8.

9. Respondents deny the allegations in Paragraph 9.

10. Respondents admit the allegations in Paragraph 10.

11. Respondents deny the allegations in Paragraph 11.

12. Respondents deny the allegations in Paragraph 12.

13. Respondents deny soliciting investors for Issuer A, but introduced friends and family to the opportunity, and are without information or knowledge sufficient to either admit or deny the remaining allegations in Paragraph 13.

14a. thru f.. Respondents deny they "participated" in effecting transactions in Issuer A's preferred stock.

15. Respondent Pollack denies the allegations in Paragraph 15.

16. Respondents deny the allegations in Paragraph 16.

17. Respondents deny the allegations in Paragraph 17.

18. Respondents admit the allegations in Paragraph 18a. thru f., except that Respondents are without information or knowledge sufficient to either admit or deny the stated values in Paragraph 18a. thru f.

19. Respondents are without information or knowledge sufficient to either admit or deny the allegations in Paragraph 19.

20. Respondents admit the allegations in Paragraph 20.

21-22. Respondents are without information or knowledge to either admit or deny the allegations in Paragraph 21 and 22.

23-29. Respondents deny each and every allegation in Paragraphs 23 thru 29.

Respondents deny participating in "wash trades" or "creating the appearance of false or misleading active trading in the stock of Issuer A.

30-32. Respondents deny the allegations in Paragraphs 30-32.

III.

Respondents deny that the Commission is entitled to any remedial action alleged in Paragraphs A thru D.

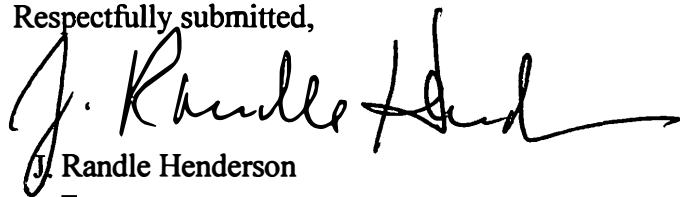
IV.

Respondents assert that no response is required to the statements in Section IV.

Respondents pray that this Proceeding be dismissed as to Respondents, that the Commission take nothing and that Respondents be awarded all relief to which they are justly entitled.

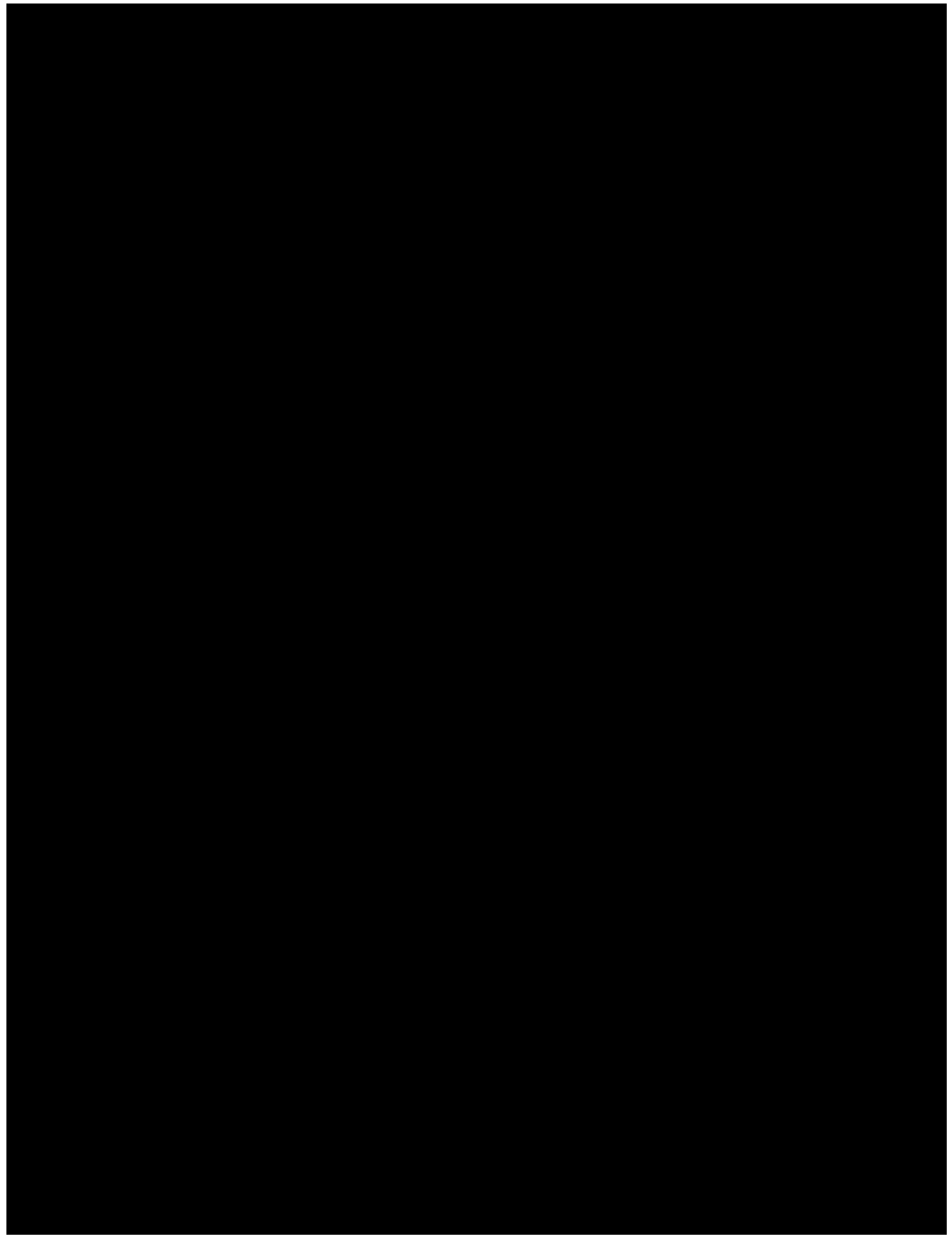
Dated February 16, 2015.

Respectfully submitted,

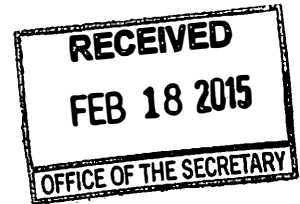


J. Randle Henderson

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**J. RANDLE HENDERSON
ATTORNEY at LAW**



February 16, 2015

Brent Fields, Secretary
Securities and Exchange Commission
100 F Street, N.E.
Mail Stop 1090
Washington, D.C. 20549

Re: In the Matter of Paul J. Pollack and Montgomery Street Research; File No. 3-16316

Dear Sir;

I enclose an original and three (3) copies of Answer of Respondents Paul J. Pollack and Montgomery Street dents for your file in the subject matter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. Randle Henderson".

J. Randle Henderson

c: Gregory Kasper, Esq.
Marc Ricchiute, Esq.
Denver Regional Office



(via electronic transmission)