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ADMINISTRATIVE PROCEEDING  
FILE NO. 3-16354

Received  
MAR 8 2015  
Office of Administrative  
Law

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION

In the Matter of  
David B. Havanich, Jr.,  
Carmine A. DellaSala,  
Matthew D. Welch,  
Richard Hampton Scurlock, III,  
RTAG Inc. d/b/a Retirement  
Tax Advisory Group,  
Jose F. Carrio,  
Karasik & Associates, LLP  
Michael J. Salovay

Respondents,

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**ANSWER OF DEFENDANTS RICHARD H. SCURLOCK, III, and RTAG Inc.**

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Comes Richard Hampton Scurlock, III (“Scurlock”) and RTAG Inc. (“RTAG”) (collectively, the “Defendants”), by counsel, and for their Answer to the Order Instituting Administrative Cease-and-Desist Proceedings.

**FIRST DEFENSE**

1. The Defendants state that Part I of the Order appears to set forth a background to justify instituting cease-and-desist proceedings and no response is required and therefore deny the same.

2. The Defendants state that they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Part II, Subpart A,

Paragraphs 1, 2, and 3 of the Order. To the extent there is any allegation stated therein, it is hereby denied.

3. The Defendants admit the allegations contained in Part II, Subpart A, Paragraphs 4 and 5 of the Order.

4. The Defendants state that they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Part II, Subpart A, Paragraphs 6, 7, 8, and 9 of the Order. To the extent there is any allegation stated therein, it is hereby denied.

5. The Defendants state that they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Part II, Subpart B, Paragraph 1 of the Order. To the extent there is any allegation stated therein, it is hereby denied.

6. The Defendants state that they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Part II, Subpart C, Paragraph 1 of the Order. To the extent there is any allegation stated therein, it is hereby denied.

7. The Defendants deny the allegations and characterizations contained in Part II, Subpart C, Paragraph 2 of the Order .

8. The Defendants state that they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Part II, Subpart D, Paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, and 11 of the Order. To the extent there is any allegation stated therein, it is hereby denied.

9. The Defendants deny the allegations, if any, contained in Part II, Subpart E of the Order.

10. With respect to the allegations contained in Part II, Subpart E, Paragraph 1 of the Order, the Defendants admit only to the extent that they entered into a Finder's Fee Agreement. The Defendants deny the rest.

11. The Defendants deny the allegations contained in Part II, Subpart E, Paragraphs 2, 3, 4, and 5 of the Order.

12. The Defendants deny the allegations, if any, contained in Part II, Subpart F of the Order.

13. The Defendants deny the allegations, if any, contained in Part II, Subpart F, Paragraph 1(a) of the Order.

14. The Defendants deny the allegations, if any, contained in Part II, Subpart F, Paragraph 1(b) of the Order.

15. With respect to the allegations contained in Part II, Subpart F, Paragraph 1(c) of the Order, the Defendants admit only to the extent that Scurlock recommended Diversified's bonds to RTAG's clients and others. Pursuant to the Finder's Fee Agreement, materials provided were those furnished by Diversified and Scurlock highlighted the risks. The Defendants deny any further allegations contained therein.

16. The Defendants deny the allegations, if any, contained in Part II, Subpart F, Paragraph 1(d) of the Order.

17. The Defendants state that they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Part II, Subpart F,

Paragraph 2(a), 2(b), 2(c), 2(d), 2(e), and 2(f) of the Order. To the extent there is any allegation stated therein, it is hereby denied.

18. The Defendants state that they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Part II, Subpart F, Paragraph 3(a), 3(b), and 3(c) of the Order. To the extent there is any allegation stated therein, it is hereby denied.

19. The Defendants state that they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in any section and subsection of Part II, Subpart G of the Order. To the extent there is any allegation stated therein, it is hereby denied.

20. The Defendants state that they are without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Part II, Subpart H, Paragraphs 1, 2, and 3 of the Order. To the extent there is any allegation stated therein, it is hereby denied.

21. The Defendants deny the allegations contained in Part II, Subpart I, Paragraphs 1, 2, 3, 4, 5, and 6 of the Order.

22. With respect to Part III of the Order, the Defendants restate and incorporate by reference their answers and defenses to all previous paragraphs and the Defendants further deny the allegations therein and state that remedial action is inappropriate with regard to the Defendants.

23. The Defendants deny any and all allegations not specifically admitted herein.

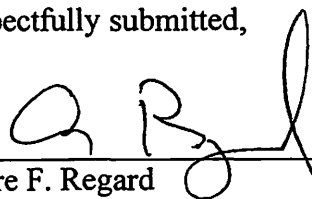
**SECOND DEFENSE**

The Defendants state that the claims asserted in the Order are barred, in whole or in part, by the affirmative defenses of estoppel, statute of limitations, waiver, laches, and any other applicable defense available to the Defendants under applicable law. The Securities and Exchange Commission should be required to provide strict proof of any claimed damages.

**THIRD DEFENSE**

The Defendants reserve the right to amend this Answer to assert additional defenses as may be available or become available as discovery proceeds in this action. The Defendants also reserve the right to plead further in this matter, including without limitation to amend this Answer to assert other claims.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served in the manner provided upon the following persons on this 13<sup>th</sup> day of March, 2015:

The Honorable Carol Fox Foelak  
Administrative Law Judge  
Securities and Exchange Commission  
100 F. Street, N.E.  
Washington, D.C. 20549-9303  
Facsimile: (202) 777-1031  
Email: foelakc@sec.gov  
VIA FACSIMILE TRANSMISSION AND  
NON-FACSIMILE ORIGINAL WITH  
MANUAL SIGNATURE  
CONTEMPORANEOUSLY  
VIA US MAIL

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K. Karasik*  
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Mr. Michael J. Salovay



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Andre F. Regard

# REGARD LAW GROUP, PLLC

ATTORNEYS AT LAW

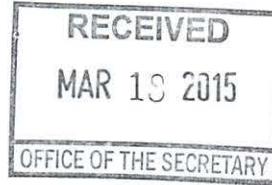
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March 13, 2015

*Via Facsimile No. (202) 777-1031 on 3/13/2015  
And United States Mail*

The Honorable Carol Fox Foelak  
Administrative Law Judge  
Securities and Exchange Commission  
100 F. Street, N.E.  
Washington, D.C. 20549-9303



Received

MAR 18 2015

Office of Administrative  
Law Judges

Re: File No. 3-16354  
In the Matter of: David B. Havanich, Jr., Carmine A. DellaSala, Matthew D. Welch,  
Richard Hampton Scurlock, III, RTAG Inc. d/b/a Retirement Tax Advisory Group,  
Jose F. Carrio, Dennis K. Karasik, Carrio, Karasik & Associates, LLP, and Michael J.  
Salovay

Dear Judge Foelak,

Please find the attached Answer of Defendants Richard H. Scurlock and RTAG, Inc. A copy of this document was sent via fax for filing and the original plus three copies were concurrently sent via US Mail in connection with the above-captioned matter on March 13, 2015.

Thank you for your attention to this matter. Please contact me with any questions or should you require further information.

Sincerely,

A handwritten signature in blue ink, appearing to read "ARL".

Andre F. Regard

AFR/reg