

Randal Kent Hansen



February 8, 2016

Ms. Polly Atkinson, Senior Trial Counsel  
Securities and Exchange Commission  
1961 Stout Street, Suite 1700  
Denver, Colorado 80249-1961

**RE: RAHFCO Management Group, LLC; File No. 3-17049**

Dear Ms. Atkinson:

This will acknowledge receipt of your letter of February 1, 2016, in reference to the above subject. However, I call to your attention that first case against myself and RAHFCO, brought by yourself and RAHFCO, which is presently pending appeal with the Second Circuit Court of Appeals. I believe that the SEC Secretary and yourself have no standing at this time.

Please find enclosed my Motion and Memorandum of Law, which specifically hinges on the long standing doctrines of collateral estoppel and res judicata. Where you and the SEC have had a full and fair opportunity to have litigated the same issues in the first action, I believe that you are barred from again bringing the second action (present) requesting the same relief as in the case on appeal.

Therefore, I do not believe that there is a need to waste further taxpayer money in the paying of your wages and the SEC and Administrative Law Judges to bring this instant pretended action.

If I had had an attorney you, nor the SEC Secretary would be doing what you are presently doing, which is an abuse of authority and of the system, which you as a Senior Trial Attorney, are going to be held fully accountable for all of the costs, disbursements and expenses involved in defending your frivolous actions, which are clearly meant to harass.

In concluding, I sent you an email advising that you would have to call Mr. Millich, Counselor to arrange for me to call you to discuss this, which you'd suggested in your letter. If you make the call to Millich, I will be able to discuss this with you.

I have copied the SEC and Court in this action, as I wish all involved to understand my position, I will not allow you or others to harass me or abuse the system.

Sincerely,

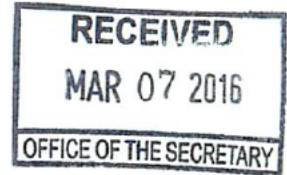
A handwritten signature in blue ink that reads "Randal Kent Hansen".

Randal Kent Hansen

Enclosures

c: w/enc: SEC Secretary

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING  
File No. 3-17049

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In the Matter of

RAHFCO MANAGEMENT  
GROUP, LLC

MOTION TO DISMISS BASED ON  
COLLATERAL ESTOPPEL AND  
RES JUDICATA

Respondent.

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Comes now, Randal Kent Hansen and RAHFCO Management Group with its Motion to dismiss based upon the long standing doctrines of Collateral Estoppel and Res Judicata, which resolve this issue and newly filed case against RAHFCO Management Group, LLC.

**WHEREFORE**, Randal Kent Hansen and RAHFCO Management Group respectfully move that the Court grant Respondent RAHFCO the following relief:

1. Dismiss with prejudice the pretended action of the Securities and Exchange Commission based upon the doctrines of collateral estoppel and res judicata, where the SEC has had a full and fair opportunity to have fully litigated the same issues in a previous action, U.S. Securities and Exchange Commission v. Hansen, et al., SDNY, File No. 1:13-cv-1403, which was presided over by the Honorable Mernon S. Broderick which is presently pending appeal in the United States Court of Appeals for the Second Circuit; and

2. Grant Respondents their costs, disbursements and any further relief that is appropriate.

Dated: February 8, 2016.

Respectfully submitted,

A handwritten signature in blue ink that reads "Randal Kent Hansen". The signature is written in a cursive style and is positioned above a horizontal line.

Randal Kent Hansen

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UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING  
File No. 3-17049

RESPONDENTS MEMORANDUM OF  
LAW IN SUPPORT OF DISMISSAL

In the Matter of

RAHFCO MANAGEMENT  
GROUP, LLC

Respondent.

TO: THE ADMINISTRATIVE LAW JUDGE, SEC SECRETARY AND POLLY ATKINSON, SEC  
TRIAL COUNSEL

PLEASE TAKE NOTICE that the undersigned Respondent will argue that the present case must be dismissed based upon the standing doctrines of collateral estoppel and res judicata. The Securities and Exchange Commission (SEC) had in In the Matter of Randal Kent Hansen, File No. 1:13-cv-1403, SDNY, Honorable Vernon S. Broderick, the full and fair opportunity to have litigated the same issue that they are attempting to re-litigate in the instant case, which must be barred and dismissed.

COLLATERAL ESTOPPEL AND RES JUDICATA DEMAND DISMISSAL.

This is not new to the SEC, that these doctrines control further litigation after there has been the right to fully and fairly litigate.

In 2015 U.S. Dist. LEXIS 22024: Murray v. UBS Sec., LLC, (Feb. 4, 2016). In this case the Securities and Exchange Commission (SEC) brought an action. As the Murray Court properly held, "The rule ... against duplicative litigation is distinct from but related to the doctrine of claim preclusion or res judicata." Id. (citing and quoting Curtis v. Citi Bank, N.A., 226 F.3d 133, 138 (2nd Cir. 2000)).

Because the SEC could and should have, but failed to raise this in the first proceeding they are barred by the rule of preclusion.

**General Docket**  
**Court of Appeals, 2nd Circuit**

<b>Court of Appeals Docket #: 16-74</b>		<b>Docketed: 01/08/2016</b>	
<b>Nature of Suit: 1850 STATUTES-Secur Comm Exchange</b>			
<b>U.S. Securities and Exchange C v. Hansen</b>			
<b>Appeal From: SDNY (NEW YORK CITY)</b>			
<b>Fee Status: due</b>			
<b>Case Type Information:</b>			
1) Civil			
2) United States			
3) -			
<b>Originating Court Information:</b>			
<b>District: 0208-1 : 13-cv-1403</b>			
<b>Trial Judge: Vernon S. Broderick, U.S. District Judge</b>			
<b>Date Filed: 03/01/2013</b>			
<b>Date</b>	<b>Date Order/Judgment</b>	<b>Date NOA</b>	<b>Date Rec'd</b>
<b>Order/Judgment:</b>	<b>EOD:</b>	<b>Filed:</b>	<b>COA:</b>
12/16/2015	12/16/2015	01/05/2016	01/08/2016
<b>Prior Cases:</b>			
None			
<b>Current Cases:</b>			
None			
<b>Panel Assignment: Not available</b>			


<p>U.S. Securities and Exchange Commission Plaintiff - Appellee</p> <p>-----</p> <p>Rahfco Management Group, LLC Defendant</p> <p>Vincent Puma Defendant</p> <p>Hudson Capital Partners Corporation Defendant</p>	<p>Michael Andrew Conley, Deputy General Counsel Direct: 202-551-5127 [COR NTC US Attorney] United States Securities and Exchange Commission 100 F Street, NE Washington, DC 20549</p>
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RESPONDENT RAHFCO'S EXHIBIT 1-1

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Randall Kent Hansen (-: 12872-273)  
 Defendant - Appellant

Randall Kent Hansen, -  
 [NTC Pro Se]



U.S. Securities and Exchange Commission,  
 Plaintiff - Appellee,

v.

Randall Kent Hansen,  
 Defendant - Appellant,

Rahfco Management Group, LLC, Vincent Puma, Hudson Capital Partners Corporation,  
 Defendants.

01/08/2016	<input type="checkbox"/>	<u>1</u>	NOTICE OF CIVIL APPEAL, with district court docket, on behalf of Appellant Randall Kent Hansen, FILED. [1680196] [16-74] [Entered: 01/08/2016 04:30 PM]
		18 pg, 144.37 KB	
01/08/2016	<input type="checkbox"/>	<u>2</u>	DISTRICT COURT JUDGMENT, dated 12/16/2015, RECEIVED. [1680203] [16-74] [Entered: 01/08/2016 04:32 PM]
		8 pg, 214.3 KB	
01/08/2016	<input type="checkbox"/>	<u>3</u>	ELECTRONIC INDEX, in lieu of record, FILED.[1680204] [16-74] [Entered: 01/08/2016 04:32 PM]
		17 pg, 111.76 KB	
01/08/2016	<input type="checkbox"/>	<u>4</u>	INSTRUCTIONAL FORMS, to Pro Se litigant, SENT.[1680210] [16-74] [Entered: 01/08/2016 04:33 PM]
		2 pg, 10.37 KB	

- Documents and Docket Report
- Documents and Docket Summary
- Documents Only

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EXHIBIT 1-2

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