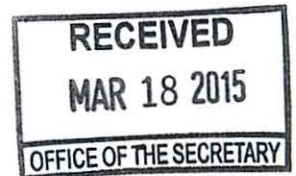


**HARD COPY**

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

**ADMINISTRATIVE PROCEEDING  
File No. 3-16392**



**In the Matter of**

**BRADLEY A. HOLCOM,**

**Respondent.**

**ANSWER OF BRADLEY A. HOLCOM**

The Division of Enforcement received, by regular mail, the attached Answer of Bradley A. Holcom, dated February 28, 2013.

Dated: March 17, 2015

Respectfully submitted,

A handwritten signature in blue ink that reads "Nancy K. Ferguson".

Nancy K. Ferguson  
Division of Enforcement  
Securities and Exchange Commission  
Byron G. Rogers Federal Building  
1961 Stout Street, Suite 1700  
Denver, CO 80294-1961  
Email: [fergusonn@sec.gov](mailto:fergusonn@sec.gov)  
Phone: 303.844.1050

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Division of Enforcement's Entry of Appearance was served on the following on this 17th day of March, 2015, in the manner indicated below:

Securities and Exchange Commission  
Brent Fields, Secretary  
100 F Street, N.E.  
Mail Stop 1090  
Washington, D.C. 20549  
(Via Facsimile and original and three copies by UPS)

Chief ALJ Brenda P. Murray  
100 F Street, N.E.  
Mail Stop 2557  
Washington, D.C. 20549  
(Via Email and UPS)

Bradley A Holcom

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

(Via US Mail)

  
Marla J. Pinkston

Mr. Nicholas Heintke, Esq.  
Denver Regional Office  
SEC  
Byron Rogers Federal Building  
1961 Stout St. #1700  
Denver, CO 80294-1961

2/28/2015

Dear Mr. Heintke,

I have reviewed the Order Instituting Administrative Proceedings and attached letter dated 2/19/2015. I have also read the sections in the SEC Rules of Practice Handbook which were referenced.

I agree with Section III, A and B in the letter. Therefore I see no reason to object in any manner.

On a personal note I would like to formally apologize to you and your staff for my many failures and shortcomings. The SEC did a comprehensive investigation without my cooperation and correctly assessed all the wrongs I created.

Obviously at 60, with 10 years to serve I have no intent to ever return to the financial industry. And, I completely understand the sanctions I already agreed to.

Prison has been a challenging adjustment. I'm learning the BOP is oriented to rehab, rather than punishment. I now have many years to reflect and try to forgive myself for the harm I caused to people. Everyday I feel guilt, remorse, and sadness.

In retrospect, if I had clearly understood my actions were criminal in 2009, I would have turned myself over to the San Diego District Attorney to fast track the process. Sincerely, I regret the human resources I wasted by not correctly assessing my situation earlier.

Respectfully Submitted,

Bratley A. Holcom.