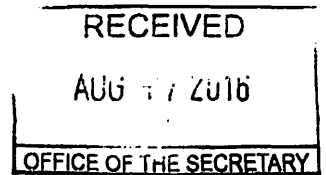


HARD COPY
UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION



ADMINISTRATIVE PROCEEDING
File No. 3-17049

In the Matter of

**RAHFCO MANAGEMENT
GROUP, LLC**

Respondent.

**SECOND SUPPLEMENTAL REPLY
IN SUPPORT OF MOTION FOR
SUMMARY DISPOSITION
PURSUANT TO RULE 250 OF THE
COMMISSION RULES OF
PRACTICE**

The Division of Enforcement hereby files its Second Supplemental Reply in Support of its Motion for Summary Disposition against Respondent RAHFCO Management Group, LLC (“RAHFCO”).

On August 11, 2016, the Division received “RESPONDENTS REPLY TO MOTION OF THE SEC FOR SANCTIONS” (“Response”). In its Response, RAHFCO does not address or discuss any of the factors to be considered in determining whether bars against RAHFCO would be in the public interest. Nevertheless, RAHFCO’s Response is determinative of two issues.

First, RAHFCO continues to exist. Randal Hansen controls RAHFCO. In RAHFCO’s Response Mr. Hansen refers to RAHFCO as “his company.” *See* Response at page 1. It is Randal Hansen’s alter ego and as long as he exists, it does as well. Moreover, RAHFCO, through Mr. Hansen, continues to vigorously defend itself. RAHFCO has made several filings in this case. Whatever its nominal corporate status, RAHFCO clearly continues to exist as an entity.

Second, RAHFCO fails to acknowledge wrong-doing, accept responsibility, or offer sincere assurances against future violations. In fact, it is the position of RAHFCO that neither it,

nor Mr. Hansen, has “done anything wrong, even subsequent to having been found guilty by a jury.” *See* Response at p. 1. RAHFCO’s position that its Ponzi-scheme was a “legal, legitimate business” clearly demonstrates that bars against it are in the public interest and necessary for the protection of investors. *See* Response at p. 2.

The Division again requests that its Motion for Summary Disposition be granted and that collateral bars be entered against RAHFCO under Exchange Act Section 15(b) and Advisers Act Section 203(e) barring it from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization.

Respectfully submitted this 16th day of August, 2016.

Polly Atkinson by ncn
Polly Atkinson
Division of Enforcement
Securities and Exchange Commission
Denver Regional Office
1961 Stout Street, Ste. 1700
Denver, CO 80294

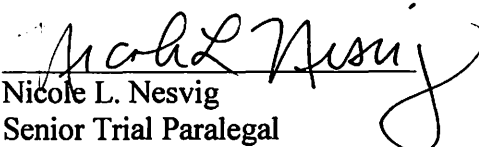
SERVICE LIST

On August 16, 2016, the foregoing **SECOND SUPPLEMENTAL
REPLY IN SUPPORT OF MOTION FOR SUMMARY DISPOSITION
PURSUANT TO RULE 250 OF THE COMMISSION RULES OF PRACTICE**
was sent to the following parties and other persons entitled to notice:

Office of the Secretary
Brent Fields, Secretary
Securities and Exchange Commission
100 F Street, N.E.
Mail Stop 1090
Washington, DC 20549-2557
(By Facsimile and original and three copies by UPS)

Honorable Carol Fox Foelak
100 F Street, N.E.
Mail Stop 2580
Washington, D.C. 20549
(By Email)

Mr. Randal K. Hansen – Register # [REDACTED]
[REDACTED]
[REDACTED]
Duluth, MN [REDACTED]
(By U.S. Mail)


Nicole L. Nesvig
Senior Trial Paralegal