

**In the Matter of
*The Securities Act, 1988***

and

**In the Matter of
Fluid FX
(also known as : Fluid FX Inc., Fluid FX International, and Fluid FX Offshore LLC),
Paul Anderson,
Alan P. Howard, and
John Andrews**

**Temporary Order
(Section 134)**

WHEREAS the Financial and Consumer Affairs Authority of Saskatchewan (the Authority) has delegated to the Director of the Securities Division (the Director) the power to make orders pursuant to section 134 of *The Securities Act, 1988*, SS 1988, c S-42.2 (the *Act*);

AND WHEREAS staff of the Authority has applied for a Temporary Order pursuant to sections 134(1) and 134(3) of the *Act*;

AND WHEREAS, upon a review of staff of the Authority's application, it appears to the Director that:

1. Fluid FX (also known as Fluid FX Inc., Fluid FX International, and Fluid FC Offshore LLC) holds itself out as being an offshore commodities and FOREX trading firm which offers non-discretionary trading accounts and fully managed accounts to commodity and FOREX traders across the world.
2. Fluid FX owns and operates a website located at <https://www.fluidfxint.com> (the Website) which is accessible by Saskatchewan residents.
3. The Website provides a securities or derivatives trading platform to the public. The Websites provide information on securities or derivatives trading, and facilitates securities or derivatives trading by users of the Website;
4. Paul Anderson and Alan P. Howard hold themselves out as being brokers with Fluid FX. John Andrews holds himself out as being a compliance officer with Fluid FX.
5. At least one resident of Saskatchewan was contacted by Fluid FX and purchased securities or derivatives with the advice, assistance, or approval of Paul Anderson, Alan P. Howard, and John Andrews.

6. Fluid FX, Fluid FX Inc., Fluid FX International, Fluid FX Offshore LLC, Paul Anderson, Alan P. Howard, and John Andrews are not registered as a 'dealers' in Saskatchewan pursuant to section 27 of the *Act*;
7. Fluid FX, Fluid FX Inc., Fluid FX International, Fluid FX Offshore LLC, Paul Anderson, Alan P. Howard, and John Andrews appear to be engaging in or holding themselves out as engaging in the business of trading in securities or derivatives as principal or agent in Saskatchewan without registration contrary to section 27 of the *Act*;
8. Fluid FX, Fluid FX Inc., Fluid FX International, Fluid FX Offshore LLC, Paul Anderson, Alan P. Howard, and John Andrews are not registered as a 'advisers' in Saskatchewan pursuant to section 27 of the *Act*;
9. Fluid FX, Fluid FX Inc., Fluid FX International, Fluid FX Offshore LLC, Paul Anderson, Alan P. Howard, and John Andrews appear to be engaging in or holding themselves out as engaging in the business of advising another as to the investing in or the buying or selling of securities or derivatives without registration contrary to section 27 of the *Act*;

AND WHEREAS the Director is of the opinion that the length of time required for a hearing would be prejudicial to the public interest;

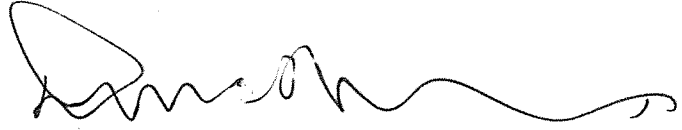
AND WHEREAS the Director is of the opinion that it is in the public interest to make this order;

THE DIRECTOR HEREBY ORDERS THAT:

1. Pursuant to sections 134(1)(a) and 134(3) of the *Act*, the exemptions in Saskatchewan securities laws do not apply to Fluid FX, Fluid FX Inc., Fluid FX International, Fluid FX Offshore LLC, Paul Anderson, Alan P. Howard, and John Andrews up to and including January 25, 2018;
2. Pursuant to sections 134(1)(d) and 134(3) of the *Act*, Fluid FX, Fluid FX Inc., Fluid FX International, Fluid FX Offshore LLC, Paul Anderson, Alan P. Howard, and John Andrews shall cease trading in securities and derivatives in Saskatchewan up to and including January 25, 2018;
3. Pursuant to sections 134(1)(d.1) and 134(3) of the *Act*, Fluid FX, Fluid FX Inc., Fluid FX International, Fluid FX Offshore LLC, Paul Anderson, Alan P. Howard, and John Andrews shall cease acquiring securities and derivatives for and on behalf of residents of Saskatchewan up to and including January 25, 2018; and
4. Pursuant to sections 134(1)(e) and clause 134(3) of the *Act*, Fluid FX, Fluid FX Inc., Fluid FX International, Fluid FX Offshore LLC, Paul Anderson, Alan P. Howard, and John Andrews shall cease giving advice respecting securities and derivatives in Saskatchewan up to and including January 25, 2018.

TAKE NOTICE THAT this Order may be extended for such period as the Authority considers necessary where satisfactory information is not provided to the Authority prior to the expiration of this Order.

DATED at Regina, Saskatchewan on January 11, 2018.

A handwritten signature in black ink, appearing to read 'Dean Murrison', written over a horizontal line.

Dean Murrison
Director,
Securities Division
Financial and Consumer Affairs Authority of
Saskatchewan