

**IN THE MATTER OF THE SECURITIES ACT
R.S.N.S. 1989, CHAPTER 418, AS AMENDED ("ACT")**

-AND-

**CLARKE INC., and GEOSAM INVESTMENTS LIMITED (collectively the
"RESPONDENTS")**

**ORDER
(Sections 135 and 135A)**

WHEREAS on September 25, 2009 the Nova Scotia Securities Commission ("Commission") issued a Notice of Hearing to the Respondents pursuant to Sections 135 and 135A of the Act;

AND WHEREAS the Respondents entered into a settlement agreement with Staff of the Commission ("Staff") whereby it agreed to a proposed settlement of the proceeding, subject to the approval of the Commission;

AND WHEREAS Staff and the Respondents recommended approval of the Settlement Agreement;

AND WHEREAS the Commission is of the opinion that the Respondents failed to comply with Nova Scotia securities laws and it is in the public interest to make this Order;

AND UPON reviewing the Settlement Agreement and the Notice of Hearing, and upon hearing submissions of counsel for Staff and the Respondents;

IT IS HEREBY ORDERED pursuant to Sections 135 and 135A of the Act that:

1. The Settlement Agreement dated September 23, 2009, a copy of which is attached is approved;
2. Pursuant to section 135 of the Act, the Respondents shall, jointly and severally, pay an administrative penalty in the aggregate amount of Four Hundred Thousand Dollars (\$400,000.00);
3. Pursuant to Section 135A of the Act, the Respondent Geosam Investments Limited shall pay costs in connection with the joint investigation of conduct in the proceedings in the amount of Fifteen Thousand Dollars (\$15,000.00); and

4. Pursuant to Section 135A of the Act, the Respondent Clarke Inc. shall pay costs in connection with the joint investigation of conduct in the proceedings in the amount of Fifteen Thousand Dollars (\$15,000.00).

DATED at Halifax, Nova Scotia, this 9th day of October 2009.

NOVA SCOTIA SECURITIES COMMISSION



Paul Radford, Q.C.