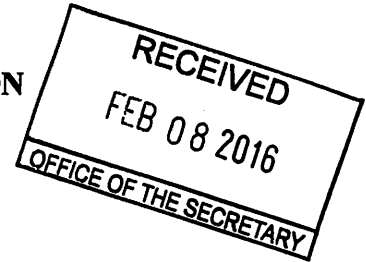


UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-17043



In the Matter of

PAUL D. CRAWFORD,

ANSWER OF PAUL D. CRAWFORD

Respondent.

Comes now Paul D. Crawford, through and by his undersigned counsel, and in accordance with Rules 220 and 310 of the Commissions Rules of Practice, hereby files the following answer to the Order Institution Administrative Proceedings Pursuant to Section 15(b) of the Securities Exchange Act of 1934.

1. He denies that it is in the interests of the public that this proceeding be instituted, as alleged in paragraph I. The SEC sued Mr. Crawford in the United States District Court for the District of Minnesota. This is a duplicate proceeding and inefficient use of scarce government resources.

2. He admits the assertions of paragraph II A, but alleges that he acted as a finder for those who invested in Bixby, which is a status the SEC has repeatedly recognized, and a status that does not require a securities license.

3. He admits the Minnesota District Court, by the Honorable Joan N. Ericksen, granted summary in favor of the SEC on December 9, 2016. By Order filed January 28, 2016, the Court added prejudgement interest, amending the final Judgement. He plans to file a timely notice of appeal, and requests this administrative proceeding be stayed pending the Eighth Circuit's

complete review.

4. He acknowledges the SEC's verbiage in its Amended Complaint, paragraph II B 3, but not the vitality of its claims. Indeed Mr. Crawford denies the factual basis in support of the Court's Summary Judgement ruling.

5. In response to Section III, paragraphs A and B, Mr. Crawford again denies the allegation that he violated the Securities Exchange Act of 1934, and denies that any remedial action need be taken in this venue, in light of the District Court's ruling. He alleges two defenses: that he acted as a finder, and that the statute of limitations bars this action.

Dated: February 1, 2016

Respectfully submitted,



Paul Engh
Suite 420, 200 South Sixth Street
Minneapolis, MN 55402
Phone: 612.252.1100
Engh4@aol.com

Lawyer for Paul D. Crawford

Page 10

On this date, the undersigned, being duly sworn, depose and say that the foregoing is a true and correct copy of the original as the same appears in the files of the undersigned.

Subscribed and sworn to before me this 10th day of August, 1964.

Notary Public for the State of California

My commission expires on the 10th day of August, 1965.

Witness my hand and the seal of my office this 10th day of August, 1964.

Notary Public for the State of California

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UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

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File No. 3-17043

In the Matter of

PAUL D. CRAWFORD,

CERTIFICATE OF SERVICE

Respondent.

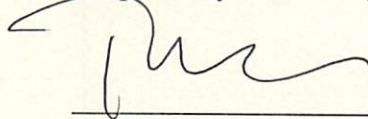
Paul Engh, an attorney, certifies that on February 1, 2016, he caused a true and correct copy of Mr. Paul D. Crawford's Answer to be served on the following by United States Mail:

The Honorable Cameron Elliot
Administrative Law Judge
Securities and
Exchange Commission
100 F. Street, N.E.
Washington, DC 20549-2557

Timothy J. Stockwell and Jonathan S. Polish
Division of Enforcement
United States Securities and Exchange Commission
175 West Jackson Blvd., Suite 900
Chicago, IL 60604

Dated: February 1, 2016

Respectfully submitted,



Paul Engh
Suite 420, 200 South Sixth Street
Minneapolis, MN 55402
Phone: 612.252.1100
Engh4@aol.com

PAUL ENGH

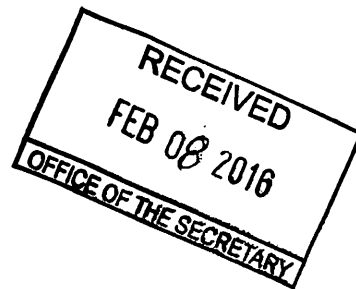
LAWYER

(612) 252-1100

**SUITE 420
200 SOUTH SIXTH STR
MINNEAPOLIS, MN 55402
FAX: (612) 339-7851**

February 1, 2016

Brent J. Fields, Secretary
Office of the Secretary
Securities and Exchange Commission
100 F. Street, N.E.
Washington D.C. 20549



RE: In the Matter of Paul D. Crawford (AP File No. 3-17043)

Dear Mr. Fields,

Enclosed for filing in the above matter please find an original and three copies of Mr. Paul D. Crawford's Answer, and related Certificates of Service.

Sincerely yours,

A handwritten signature in black ink, appearing to be "Paul Engh", written over a horizontal line.

Paul Engh

cc: The Honorable Cameron Elliot, AJJ
Jonathan S. Polish and Timothy J. Stockwell

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