

STATE OF ALASKA
DEPARTMENT OF COMMERCE, COMMUNITY, AND ECONOMIC DEVELOPMENT
DIVISION OF BANKING AND SECURITIES

IN THE MATTER OF:)
)
CODAWN CONSULTING)
CORPORATION;)
SENTINEL CAPITAL CORP.;)
CHRISTOPHER BRYAN;)
CODY ROACH; and)
CRAIG WIGINTON)
Respondents.)

ORDER NO. 16-67-S
TEMPORARY CEASE AND DESIST
ORDER EFFECTIVE IMMEDIATELY,
ASSESSING CIVIL PENALTIES,
WITH NOTICE OF HEARING RIGHTS
and
NOTICE OF FINAL CEASE AND DESIST
ORDER

The Director of the Department of Commerce, Community, and Economic Development, Division of Banking and Securities (“Administrator”), has conducted an investigation into certain business activities of Codawn Consulting Corporation (“Codawn”), Sentinel Capital Corp. (“Sentinel”), Christopher Bryan, Cody Roach, and Craig Wiginton (collectively, the “Respondents”), and has determined that Respondents violated certain provisions of the Alaska Securities Act, Alaska Statute (“AS”) 45.55 *et seq.*

I. FINDINGS OF FACT

1. Codawn was incorporated in the State of California on December 20, 2006 (entity no. C2960578), and had an address of 27031 Vista Terrace, Lake Forest, California, 92630. Roach was the registered agent.

2. Sentinel was incorporated in the State of California on February 14, 2008 (entity no. C3076605), and had an address of 3943 Irvine Blvd., Suite 214, Irvine, California, 92602. Bryan was the registered agent.

3. Roach was the President and Wiginton was the Director of Client Relations for Codawn. It is unclear what Bryan’s formal role was with Codawn.

1 4. It is unclear what Roach, Wiginton, and Bryan’s formal role was with Sentinel.

2 5. In 2009, Fairbanks, Alaska resident M.G. was solicited by Respondents regarding
 3 investments in potential oil and gas ventures primarily in the gulf coast region of the United
 4 States. M.G. was told that he would receive at least double his investment plus income of
 5 \$10,049 for the next 20 years. Based on these promises, M.G. decided to invest with
 6 Respondents. The “letter agreements” that M.G. and Roach, as president of Codawn, signed
 7 reflect the same promises of return on investment.

8 6. Over the next two years, M.G. sent a total of \$160,000 to Codawn (account no.
 9 xxxxxx3415) and Sentinel (account no. xxxxxx9223):

Date	Type of Payment	To Codawn or Sentinel	Amount
08/31/09	Check	Codawn	\$25,000
09/09/09	Check	Codawn	\$25,000
05/10/10	Wire Transfer	Codawn	\$7,500
06/24/10	Wire Transfer	Sentinel	\$15,000
08/11/10	Wire Transfer	Codawn	\$10,000
09/15/10	Wire Transfer	Sentinel	\$12,000
10/1/10	Wire Transfer	Codawn	\$5,000
10/29/10	Wire Transfer	Sentinel	\$15,000
11/12/10	Wire Transfer	Codawn	\$5,000
12/17/10	Wire Transfer	Sentinel	\$5,000
12/29/10	Wire Transfer	Codawn	\$7,500
02/16/11	Wire Transfer	Sentinel	\$5,000
03/16/11	Wire Transfer	Sentinel	\$1,500

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04/01/11	Wire Transfer	Sentinel	\$2,000
04/28/11	Wire Transfer	Codawn	\$2,500
05/04/11	Wire Transfer	Sentinel	\$2,000
05/27/11	Wire Transfer	Sentinel	\$2,500
06/10/11	Wire Transfer	Codawn	\$2,500
07/15/11	Wire Transfer	Codawn	\$2,500
08/12/11	Wire Transfer	Sentinel	\$2,500
09/09/11	Wire Transfer	Sentinel	\$2,000
10/26/11	Wire Transfer	Codawn	\$3,000

7. It is unknown why M.G. was prompted to send money to Sentinel, as all investments were purportedly with Codawn.

8. There is no evidence that any of M.G.’s money was put toward oil and gas ventures.

9. M.G. reached out to respondents twice as recently as 2016, and did not receive any response. Respondents did not respond to the Administrator’s requests for information.

10. As of the date of this order, M.G. has not received any return on his investments as promised nor has he received any of his original \$160,000 back.

II. CONCLUSIONS OF LAW

1. The investments offered to M.G. were “securities” as that term is defined in AS 45.55.990(32).

2. Respondents violated AS 45.55.010 by fraudulently taking \$160,000 from M.G.

3. Respondents are subject to a civil penalty pursuant to AS 45.55.920(b) because Respondents knowingly and intentionally violated AS 45.55.010.

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1 **III. ORDER and NOTICE**

2 Pursuant to AS 45.55.920, and on the basis of the Findings of Fact, Conclusions of
3 Law, the Administrator ORDERS Respondents to:

- 4 1. CEASE AND DESIST from defrauding investors in the State of Alaska.
5 2. Pay a civil penalty in the amount of one hundred twenty-five thousand dollars
6 (\$125,000).

7 Respondents are jointly and severally liable for complying with the terms of this
8 Order, including payment of the civil penalty.

9 Pursuant to AS 45.55.920(d), each Respondent desiring a hearing must file a separate
10 request for a hearing within 15 days after receipt of this Order. The request for a hearing must
11 be in writing, must be directed to the Administrator, and must state the grounds for the request
12 to set aside or modify the Order. This Order takes effect immediately, remains in effect until 10
13 days after the hearing is held, and becomes final if a hearing is not requested within 15 days
14 after the receipt of this notice.

15 This Order is a publicly disclosable document.

16 **IT IS SO ORDERED.**

17
18 Chris Hladick, Commissioner
19 Department of Commerce, Community and
20 Economic Development

21 DATED: February 8, 2017

22 /s/ Kevin Anselm
23 BY: Kevin Anselm, Director
24 Division of Banking and Securities