

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

4 IN THE MATTER OF: ) ORDER NO. 18-125-S  
5 ELLA BENNETT ) ORDER TO CEASE AND DESIST,  
6 ) IMPOSING CIVIL PENALTIES  
7 ) AND  
8 Respondent. ) CONSENT TO ORDER  
9 \_\_\_\_\_ )

10 The Director of the Department of Commerce, Community, and Economic  
11 Development, Division of Banking and Securities (“Administrator”), has conducted an  
12 investigation into certain activities of Ella Bennett (“Respondent”), and has determined that  
13 Respondent violated certain provisions of the Alaska Securities Act, Alaska Statute (AS)  
14 45.55 *et seq.*

15 Respondent agrees that the Administrator has jurisdiction over Respondent and these  
16 matters pursuant to the Alaska Securities Act.

17 Respondent wishes to resolve and settle this matter with the Administrator. As  
18 evidenced by the authorized signature on this Order, Respondent consents to the entry of this  
19 Order based on the Conclusions of Law and Order. Respondent waives her right to appeal  
20 under AS 45.55.920(d).

21 **I. FINDINGS OF FACT**

- 22 1. Respondent is a shareholder of Kootznoowoo, Incorporated (KI).  
23 2. KI is organized pursuant to the Alaska Native Claims Settlement Act  
24 (ANCSA), 43 U.S.C. 1601 *et seq.*



1 withholding, or revocation of a proxy.

2 3. Respondent violated 3 AAC 08.315(a) by materially misrepresenting that she was a  
3 current employee of THCCITA when, in fact, her employment with THCCITA ended in  
4 November of 2017.

5 4. Respondent is subject to a civil penalty pursuant to AS 45.55.920(c) because she  
6 violated 3 AAC 08.315(a).

7 **III. ORDER**

8 Pursuant to AS 45.55.920, and on the basis of the Findings of Fact and Conclusions of  
9 Law, the Administrator ORDERS:

- 10 1. Respondent to CEASE AND DESIST from violating the Alaska Securities Act.  
11 2. Respondent to comply with all provisions of the Alaska Securities Act and  
12 associated regulations.  
13 3. Respondent to pay a civil penalty in the amount five hundred dollars (\$500), with  
14 five hundred dollars (\$500) suspended for a period of five years. If Respondent commits any  
15 violation of the Alaska Securities Act during this period, the suspended portion of the civil  
16 penalty will be immediately due.

17 This Order is a publicly disclosable document.

18 **IT IS SO ORDERED.**

19 Mike Navarre, Commissioner  
20 Department of Commerce, Community and  
Economic Development

21  
22 DATED: 6-18-2018

/s/ Patrice Walsh

23 BY: Patrice Walsh, Acting Director  
24 Division of Banking and Securities

1 **Consent to Entry of Order**

2 I, Ella Bennett, state that I have read the foregoing Order, that I am aware of the right  
3 to a hearing and appeal in this matter and have waived the same.

4 I admit to the jurisdiction of the Department of Commerce, Community and  
5 Economic Development, Division of Banking and Securities (“Department”) and further  
6 consent to entry of this Order by the Department as settlement of the issues contained in this  
7 Order. I admit to violation of the Alaska Securities Act.

8 I understand that the Department reserves the right to take further actions to enforce  
9 this Order or to take appropriate action upon discovery of other violations of the Alaska  
10 Securities Act, and that I will fully comply with the terms and conditions of this Order, the  
11 Alaska Securities Act and associated regulations.

12 I enter into this Order voluntarily and understand that this Order is a public document.

13 6-14-2018

/s/ Ella Bennett

14 Date

Ella Bennett

15  
16 SUBSCRIBED AND SWORN TO before me this 14th day of June, 2018 at  
17 Juneau, AK.

18 /s/ Shyla Germain

Notary Public in and for Alaska

19 Shyla Germain

20 Notary Printed Name

My commission expires: 7/12/2020

23 Contact Person:  
24 Adam Marks  
Financial Examiner  
(907) 269-7499