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

In the matter of:) ORDER NO: 12-0827-S
)
Gana-A ‘Yoo, Limited) ORDER TO CEASE AND DESIST,
) IMPOSING PREFILING REQUIREMENT
) ASSESSING INVESTIGATION COSTS
) AND
) CONSENT TO ORDER
)
Respondent.)
_____)

The Director of the Department of Commerce, Community, and Economic Development, Division of Banking and Securities (the Administrator), has conducted an investigation into certain business activities of Gana-A ‘Yoo, Limited (respondent), and has determined that respondent violated certain provisions of AS 45.55 et seq. (the “Alaska Securities Act”) by failing to file annual reports and proxy materials as required under AS 45.55.139.

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

Respondent wishes to resolve and settle this matter with the Administrator. As evidenced by the authorized signature on this Order, respondent consents to the entry of this Order imposing a prefiling requirement and assessing investigation costs based on the Conclusions of Law and Order. Respondent waives its right of appeal under AS 45.55.920(d).

I. FACTS

1. Gana-A ‘Yoo, Limited, maintaining a business office at 6927 Old Seward Highway, Suite 101, Anchorage, Alaska 99518, is a corporation organized under the Alaska Native

1 Claims Settlement Act (ANCSA), 43 U.S.C. 1601 et seq. Respondent has certified to the
2 Department that it has more than 500 shareholders and total assets exceeding \$1,000,000.

3 2. Under AS 45.55.139, certain ANCSA corporations must file all annual reports,
4 proxies, consents or authorizations, proxy statements, or other proxy solicitations distributed
5 to 30 or more Alaska resident shareholders concurrently with distribution of those materials
6 to shareholders.

7 3. Respondent last filed proxy materials with the Division on May 12, 2008.

8 4. On or about July 17, 2012, the Division received a public records request asking for
9 2011 annual reports from numerous ANCSA corporations. While attempting to fulfill this
10 request, the Division discovered that respondent had not filed since 2008.

11 5. On July 17, 2012, the Division mailed a letter to respondent asking for the missing
12 filings and an explanation as to why respondent did not file after 2008. Respondent
13 delivered the missing filings to the Division on July 31, 2012 and August 3, 2012 and
14 explained that its failure to file was due to administrative oversight.

15 II. CONCLUSIONS OF LAW

16 1. Respondent is subject to the filing requirements of AS 45.55.139.

17 2. Respondent violated AS 45.55.139 by not filing its annual reports or proxy materials
18 in 2009, 2010, 2011 and 2012.

19 III. ORDER

20 The Administrator, pursuant to AS 45.55.920 hereby ORDERS Gana-A'Yoo, Limited to:

21 1. CEASE AND DESIST failing to timely file annual reports and proxy materials with
22 the division;

23 2. Comply with all provisions of the Alaska Securities Act, including associated
24 regulations;

1 3. File with the Division, for a period of three years from the date of this order, all of its
2 annual reports and proxy solicitation materials required to be filed under AS 45.55.139 at
3 least 10 working days prior to dissemination to the shareholders as set forth in AS
4 45.55.920(a)(1)(B).

5 4. Repay investigation costs in the amount of \$500.

6 Respondent is hereby put on notice that any future violations of the Alaska Securities Act
7 by failing to timely file annual reports and proxy statements will be considered knowing or
8 intentional violations and will be subject to penalties listed in AS 45.55.920(b).

9 The investigative costs are due and payable in full at the time of entry of this Order.

10
11 **IT IS SO ORDERED.**

SUSAN BELL, Commissioner
Department of Commerce, Community and Economic Development

12
13
14
15 11-13-2012
16 Date

/s/ Lorie L. Hovanec
Lorie L. Hovanec, Director
Division of Banking and Securities

17
18
19 Corporate Consent to Entry of Order

20
21 I, Betty Huntington, state that I am the CEO of Gana-A 'Yoo, Limited that I am
22 authorized to act on its behalf; that I have read the foregoing Order and that I know and fully
23 understand the Order contents; that Gana-A 'Yoo, Limited has been represented by counsel
24 in this matter; that Gana-A 'Yoo, Limited acknowledges violation of the Alaska Securities

1 Act; that Gana-A 'Yoo, Limited and I have been advised of the right to a hearing; that Gana-
2 A 'Yoo, Limited voluntarily and without any force or duress, consents to the entry of this
3 Order, expressly waiving any right to a hearing in this matter; that Gana-A 'Yoo, Limited
4 understands that the Administrator reserves the right to take further actions to enforce this
5 Order or to take appropriate action upon discovery of other violations of the Alaska
6 Securities Act, and that Gana-A 'Yoo, Limited will fully comply with the terms and
7 conditions stated herein.

8 Gana-A 'Yoo, Limited understands that this Order is a public document.

9
10 10/25/12
Date

/s/ Betty Huntington
Gana-A 'Yoo, Limited

11 Name Betty Huntington

12 Title CEO

13 SUBSCRIBED AND SWORN TO before me this 25th day of October, at Anchorage, AK.

14
15 /s/ Crystal G. Sommer
Notary Public in and for Alaska

16
17 Crystal G. Sommer
Notary Printed Name
18 My commission expires: 09/26/2015

19
20 Contact Person:
21 Kristy Naylor
22 Securities Examiner
(907) 269-7675