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

IN THE MATTER OF:

SHEE ATIKÁ, INC. ORDER NO. 17-126-S

Respondent.

CONSENT ORDER

The Director of the Department of Commerce, Community, and Economic Development, Division of Banking and Securities ("Administrator"), has conducted an investigation into certain activities of Shee Atiká, Inc. ("Respondent") and has determined that Respondent violated certain provisions of the Alaska Securities Act, Alaska Statute (AS) 45.55 et seq.

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 based on the Conclusions of Law and Order. Respondent waives its right to appeal under AS 45.55.920(d).

I. FINDINGS OF FACT

1. Respondent is organized pursuant to the Alaska Native Claims Settlement Act (ANCSA), 43 U.S.C. 1601 et seq.

2. Pursuant to AS 45.55.139, a copy of all annual reports, proxies, consents or
authorizations, proxy statements, or other proxy solicitations distributed, published, or made
available by any person to at least 30 or more Alaska resident shareholders of a corporation
that has total assets exceeding $1,000,000 and a class of equity security held of record by 500
or more persons and which is exempted from the registration requirements of AS 45.55.070
by AS 45.55.138, shall be filed with the Administrator concurrently with its distribution to
shareholders.

3. Pursuant to AS 45.55.138, ANCSA corporations are exempted from the
registration requirements of AS 45.55.070.

4. Respondent has certified to the Administrator that it has more than 500
shareholders and total assets exceeding $1,000,000.

5. Pursuant to AS 45.55.160, a person may not, in a document filed with the
Administrator, make or cause to be made an untrue statement of a material fact.

6. Pursuant to 3 AAC 08.315(a), a solicitation may not be made by means of a proxy
statement, proxy, notice of meeting, or other communication that contains a material
misrepresentation.

7. Article III, Section 16 of Respondent’s bylaws states: “No person shall serve as a
director of the Corporation if such person is a council member, officer, or employee of Sitka
Tribe of Alaska.”

8. Shee Atiká shareholder, Lillian Young, is running as an independent candidate for
the Board of Shee Atiká. Lillian Young is a current employee of the Sitka Tribe of Alaska,
which she disclosed in her proxy statement filed with the Administrator under 3 AAC 08.355.

9. On May 5, 2017, Respondent sent a mailing to all shareholders and posted a letter
on its website stating, in relevant part: “one of the qualifications to be a director is that a person
cannot be ‘a council member, officer, or employee of Sitka Tribe of Alaska.’ Because Lillian
does not meet this qualification requirement, she cannot be a bona fide candidate and will not be eligible to receive any votes at the 2017 Annual Meeting.” (emphasis in original).

Respondent filed both of these solicitations with the Administrator.

10. On May 14, 2017, Respondent sent an email to all shareholders and posted another letter on its website stating, in relevant part: “to the extent that a proxy lists Lillian Young as a candidate, and whether or not she receives votes, the entire director election portion of that proxy is invalid with regard to the election of directors (and will not be counted in the director elections) because Lillian Young’s employment at Sitka Tribe of Alaska means she does not satisfy one of the qualifications to be a director of Shee Atiká.” Respondent filed both of these solicitations with the Administrator.

11. Respondent does not have any bylaw that prevents a candidate employed by the Sitka Tribe of Alaska from running for the board.

12. Respondent’s 2017 Annual Meeting is to be held on May 20, 2017. The deadline for the submission of proxies to Respondent is May 17, 2017.

CONCLUSION OF LAW

Respondent violated AS 45.55.160 and 3 AAC 08.315(a) by materially misrepresenting that Lillian Young cannot run as an independent candidate for the Shee Atiká board because she is currently employed by the Sitka Tribe of Alaska.

III. ORDER

Pursuant to AS 45.55.920, and on the basis of the Findings of Fact and Conclusions of Law, Respondents are ordered:

1. To immediately cease telling shareholders that Lillian Young cannot run as a candidate for the Shee Atiká Board of Directors.

Further, Respondent agrees:
2. To extend the deadline for the submission of proxies to the close of registration at the Annual Meeting on May 20, 2017.

3. To count all independent candidates’ proxies properly received by the submission deadline.

4. To immediately publish a corrective statement on Respondent’s website and to send out an email to all shareholders, for whom Shee Atiká has an email address, notifying them that Lillian Young may run as a candidate, that the bylaws were misrepresented by Respondent, and that the deadline for the submission of proxies is extended through the close of registration on May 20, 2017.

This Order is a publicly disclosable document.

IT IS SO ORDERED.

Chris Hladick, Commissioner
Department of Commerce, Community and Economic Development

DATED: May 17, 2017

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

Consent to Entry of Order

I, Pamela Steffes, state that I am the Vice Chair of Shee Atiká, Inc.

(Respondent), that I have read the foregoing Consent Order and that I know and fully
understand the Consent Order contents; that I have been represented by an attorney; that I have
been advised of the right to a hearing and expressly waive any right to a hearing in this matter;
that I voluntarily and without any force or duress, consent to the entry of this Consent Order,
without admitting or denying the factual allegations stated herein; that I understand that the
Administrator reserves the right to take further actions to enforce this Consent Order or to take
appropriate action upon discovery of other violations of the Alaska Securities Act; and that I
will fully comply with the terms and conditions stated herein.

I understand that this Consent Order is a publicly disclosable document.

DATED: 05/17/17
/s/ Pamela Steffes
Pamela Steffes, Vice Chairman of the Board

SUBSCRIBED AND SWORN TO before me this 17th day of May, 2017 at
Sitka, Alaska.

/s/ Kori F. Lindstrom
Notary Public in and for Sitka, Alaska

Kori F. Lindstrom

Notary Printed Name
My commission expires: 5/1/2018