

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

4 IN THE MATTER OF: )  
5 )  
6 CODAWN CONSULTING ) **ORDER NO. 16-67-S**  
7 CORPORATION; )  
8 SENTINEL CAPITAL CORP.; ) **CONSENT ORDER**  
9 CHRISTOPHER BRYAN; ) **as to**  
10 CODY ROACH; and ) **CRAIG WIGINTON**  
11 CRAIG WIGINTON )  
12 )  
13 Respondents. )  
14 \_\_\_\_\_ )

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

21 Wiginton agrees that the Administrator has jurisdiction over him and this matter  
22 pursuant to the Alaska Securities Act.

23 Wiginton wishes to resolve and settle this matter with the Administrator. As  
24 evidenced by the authorized signature on this Order, Wiginton consents to the entry of this  
Consent Order based on the Conclusions of Law and Order. Respondent waives his right of  
appeal under AS 45.55.920(d).

**I. BACKGROUND**

On February 8, 2017, the Administrator issued a Temporary Cease and Desist Order  
Effective Immediately, Assessing Civil Penalties, with Notice of Hearing Rights and Notice

1 of Final Cease and Desist Order against Respondents (“Temporary Cease and Desist Order”).

2 On June 14, 2017, Wiginton was served with the Temporary Cease and Desist Order.

3 On August 24, 2017, Wiginton requested a hearing.

4 **II. FINDINGS OF FACT**

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

7 Roach was the registered agent.

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

10 Bryan was the registered agent.

11 3. Roach was the President and Wiginton was the Director of Client Relations for  
12 Codawn, but Wiginton ended all affiliation and associated with any of the Respondents at the  
13 end of 2009.

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

15 5. In 2009, Fairbanks, Alaska resident M.G. was solicited by Respondents regarding  
16 investments in potential oil and gas ventures primarily in the gulf coast region of the United  
17 States. M.G. was told that he would receive at least double his investment plus income of  
18 \$10,049 for the next 20 years. Based on these promises, M.G. decided to invest with  
19 Respondents. The “letter agreements” that M.G. and Roach, as president of Codawn, signed  
20 reflect the same promises of return on investment.

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

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Date	Type of Payment	To Codawn or Sentinel	Amount
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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
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

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

3 8. The investments offered and sold to M.G. were not registered with the  
4 Administrator, federally covered in compliance with Alaska law, or exempt from registration.

### 5 **III. CONCLUSIONS OF LAW**

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

8 2. Wiginton violated AS 45.55.070 because the investments offered and sold to M.G.  
9 were not registered with the Administrator, federally covered in compliance with Alaska law,  
10 or exempt from registration.

### 11 **IV. ORDER**

12 Pursuant to AS 45.55.920, and on the basis of the Findings of Fact and Conclusions of  
13 Law, the Administrator ORDERS Wiginton to:

14 1. Pay sixteen thousand six hundred sixty-six dollars (\$16,666) to M.G. Payment  
15 shall be made to M.G. in the care of the Administrator by September 30, 2017.

16 2. The Administrator may execute judgment for failure to comply with this Consent  
17 Order.

18 This Consent Order only pertains to Wiginton. As such, this Consent Order only  
19 resolves all pending matters currently known to the Administrator related to Wiginton. The  
20 Temporary Cease and Desist Order dated February 8, 2017 issued against Wiginton,  
21 including the Findings of Fact and Conclusions of Law, is no longer in effect for Wiginton  
22 and is replaced by this Consent Order for Wiginton only. This Consent Order does not  
23 resolve any pending matters currently known to the Administrator related to Codawn  
24 Consulting Corporation, Sentinel Capital Corp., Bryan, and Roach.

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3 This Consent Order is a publicly disclosable document.

4 **IT IS SO ORDERED.**

5  
6 CHRIS HLADICK, Commissioner  
7 Department of Commerce, Community and  
8 Economic Development

9 DATED: \_\_October 2, 2017\_\_

\_\_\_\_\_/s/ Kevin Anselm\_\_\_\_\_

10 BY: Kevin Anselm, Director  
11 Division of Banking and Securities

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17  
18 Consent

19 I, Craig Wiginton, state that I have read the foregoing Consent Order and that I know  
20 and fully understand the Consent Order contents; that I admit the jurisdiction of the  
21 Administrator; that I admit violation of the Alaska Securities Act; that I have been advised of  
22 the right to a hearing and expressly waive any right to a hearing in this matter; that I voluntarily  
23 and without any force or duress consent to the entry of this Consent Order; that I understand  
24 that the Administrator reserves the right to take further actions to enforce this Consent Order or

1 to take appropriate action upon discovery of other violations of the Alaska Securities Act; and  
2 that I will fully comply with the terms and conditions stated herein.

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

4  
5 DATED: 9-29-17 \_\_\_\_\_ /s/ Craig Wiginton \_\_\_\_\_  
6 Craig Wiginton

7  
8 SUBSCRIBED AND SWORN TO before me this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at  
9 \_\_\_\_\_, \_\_\_\_\_.

10 **PLEASE SEE ATTACHED**  
11 **NOTARY DOCUMENTS**

\_\_\_\_\_  
Notary Public in and for \_\_\_\_\_

\_\_\_\_\_  
Notary Printed Name  
My commission expires: \_\_\_\_\_

12  
13 **Approved as to form and content:**

14  
15 \_\_\_\_\_ 9-29-17 \_\_\_\_\_ /s/ Jim McCullium \_\_\_\_\_  
16 Date Jim McCullium  
17 Attorney for Craig Wiginton