

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

IN THE MATTER OF: )  
Yvette Jack DeBlois )  
Respondent. )  
\_\_\_\_\_ )

**ORDER NO. 24-70-S**  
**ORDER VOIDING PROXIES**  
**AND**  
**CONSENT TO 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 Yvette Jack DeBlois (“Respondent”), and has determined that Respondent violated certain provisions of the Alaska Native Claims Settlement Act Corporations Proxy Solicitation and Stock Act, Alaska Statute (AS) 45.55 et seq (“ANCSA Corporations Proxy Solicitations Act”).

Respondent agrees that the Administrator has jurisdiction over Respondent and these matters pursuant to the ANCSA Corporations Proxy Solicitations 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 the right to appeal under AS 45.55.920(d).

**I. FINDINGS OF FACT**

1. Respondent is a shareholder of Huna Totem Corporation (“Huna Totem”).
2. Huna Totem is organized pursuant to the Alaska Native Claims Settlement Act

1 (“ANCSA”), 43 U.S.C. 1601 *et seq.*

2 3. Huna Totem has certified to the Administrator that it has more than 500  
3 shareholders and total assets exceeding \$1,000,000.

4 4. On June 14, 2024, the Division was made aware that the Respondent was using a  
5 modified version of the Board of Directors’ Slate Proxy (the “Modified Proxy”) for her  
6 independent candidate solicitation for the Huna Totem’s 50th annual meeting scheduled for  
7 June 22, 2024.

8 5. The Modified Proxy was titled “Proxy Huna Totem Corporation Board of  
9 Directors’ Slate Proxy” and stated, “The undersigned hereby constitutes and appoints J.W.,  
10 L.Y., and L.W.” representing the proxy was being solicited on behalf of the Huna Totem  
11 Board of Directors’ Slate.

12 6. The Modified Proxy contained a pre-filled “X” in Box 2 to vote directed with  
13 only the Respondent’s name typed out as a write-in candidate.

14 7. The Modified Proxy does not indicate that it is being solicited on behalf of the  
15 Respondent and does not include the Respondent’s proxy statement and name. The Modified  
16 Proxy incorrectly identifies the Huna Totem Board of Directors’ Slate candidates as who the  
17 proxy was being solicited on behalf of.

18 8. A proxy must indicate that the proxy is solicited on behalf of the board or, if  
19 solicited other than by the board, indicate the identity of the persons on whose behalf the  
20 solicitation is made.

21 9. Respondent has fully cooperated with the Administrator in its investigation  
22 into this matter.

23 **II. CONCLUSIONS OF LAW**

24 1. Respondent is subject to the filing requirements of AS 45.55.139 because she is a

1 shareholder of Huna Totem and Huna Totem is subject to the filing requirements.

2 2. Respondent violated 3 AAC 08.335(c)(1) by distributing a proxy that did not  
3 indicate that the proxy was being solicited on behalf of herself.

4 3. Respondent violated 3 AAC 08.315(a)(1) by materially misrepresenting that the  
5 proxy was being solicited on behalf of the Huna Totem Board of Directors' Slate when it was  
6 being solicited on behalf of the Respondent.

7 **III. ORDER and NOTICE**

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 is to comply with all provisions of the ANCSA Corporations Proxy  
11 Solicitations and Stock Act and associated regulations.

12 2. Pursuant to AS 45.55.920(A)(1)(C) the Modified Proxy is VOID, but may be  
13 counted for quorum purposes.

14 This Order is a publicly disclosable document.

15 **IT IS SO ORDERED.**

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17  
18 Julie Sande, Commissioner  
19 Department of Commerce, Community and  
Economic Development

20 DATED: 06/21/2024

/s/ Robert H. Schmidt  
BY: Robert H. Schmidt, Director  
Division of Banking and Securities

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**Consent to Entry of Order**

I, Yvette Jack DeBlois, state that I have read the foregoing Consent Order and that I know and fully understand the Consent Order contents; that Respondent has been represented by counsel in this matter; that Respondent has been advised of the right to a hearing and expressly waives any right to a hearing in this matter; that Respondent voluntarily and without any force or duress, consents to the entry of this Consent Order; that Respondent admits to violation of the ANCSA Corporations Proxy Solicitations Act; that Respondent understands 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 ANCSA Corporations Proxy Solicitations Act; and that Respondent will fully comply with the terms and conditions stated herein.

Respondent enters into this Order voluntarily and understand this Order is a public document.

6/20/2024

/s/ Yvette Jack DeBlois

Date

SUBSCRIBED AND SWORN TO before me this 20th day of June, 2024 at

Hoonah, Alaska

/s/ Billie Jack  
Notary Public in and for Alaska

Billie Jack  
Notary Printed Name  
My commission expires: w/office

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