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STATE OF CALIFORNIA
BUSINESS, TRANSPORTATION AND HOUSING AGENCY
DEPARTMENT OF CORPORATIONS

TO: Theodore T. Chinen, aka Teddy Tanaka, aka Ted Tanaka
977 Kanakou Pl.
Honolulu, HI 96825

Theodore T. Chinen, aka Teddy Tanaka, aka Ted Tanaka
Teddy Tanaka Associates, Inc.
P.O. Box 25445
Honolulu, HI 96825

735 Bishop Street, Suite 336
Honolulu, HI 96813

Theodore T. Chinen, aka Teddy Tanaka, aka Ted Tanaka, Manager/President
Trinity National, LLC
P.O. Box 25445
Honolulu, HI 96825

1005 Terminal Way, Suite 110
Reno, NV 89502

Gary Coleman, Vice President/President
Noble House International, Inc.
2050 Russet Way
Carson City, NV 89703

100 Foxshire Drive
Lancaster, PA 17601

Gary Coleman, CEO/President
Noble House International, Ltd.
313 W Liberty Street
Lancaster, PA 17603

Allen W. Bhak
91 Gregory Lane, Apt. 23
Pleasant Hill, CA 94523

DESIST AND REFRAIN ORDER

(For violations of section 25110, 25210 and 25401 of the Corporations Code)

The California Corporations Commissioner finds that:

1. At all relevant times, Theodore T. Chinen ("Chinen") also known as Teddy Tanaka or Ted Tanaka, was an officer and/or director of Teddy Tanaka Associates, Inc. ("Teddy Tanaka

1 Associates”), a Hawaii corporation that operated from the address of P.O. Box 25445, Honolulu, HI,
2 96825.

3 2. At all relevant times, Chinen also acted as Manager/President of Trinity National, LLC
4 (“Trinity National”), which also operated from the address of P.O. Box 25445, Honolulu, HI, 96825.

5 3. At all relevant times, Gary Coleman (“Coleman”) was an officer of Noble House
6 International, Inc. and/or Noble House International, Ltd. (“Noble House International”), a company
7 located in Pennsylvania and/or Nevada

8 4. At all relevant times, Allen W. Bhak, a California resident of Pleasant Hills, solicited
9 investors, for compensation, to purchase the securities offered by Chinen, Teddy Tanaka Associates,
10 Trinity National, Coleman, and Noble House International.

11 5. Beginning in or about October 28, 2003, Chinen, Teddy Tanaka Associates, Coleman, and
12 Noble House International offered or sold securities in the form of promissory notes of Teddy Tanaka
13 Associates, a Hawaii corporation, in an offering described as “a private bank transaction”.

14 6. Beginning in or about November 6, 2004, Chinen and Trinity National offered or sold
15 securities in the form of investment contracts described as a Project Funding Agreement of Trinity
16 National, a Nevada company that operated out of the same post office box as that used for Teddy
17 Tanaka Associates, specifically P.O. Box 25445, Honolulu, HI 96825. The offering was described to
18 investors as a profit-sharing program.

19 7. Through means of general solicitation, Chinen, Teddy Tanaka Associates, Coleman, and
20 Noble House International offered or sold promissory notes of Teddy Tanaka Associates at \$12,500
21 or more for the promised return of the same amount invested to be paid each week for forty weeks.
22 Payments to investors were to come from Chinen and Teddy Tanaka Associates out of
23 “commissions” that were to be received from Coleman and Noble House International from a
24 “private bank transaction”. Investors were told that should the purported transaction not conclude “as
25 scheduled”, that they would receive their investment back plus nine percent interest. The purported
26 purpose of the offering was to raise funds for a “private bank transaction”. Investors were told to
27 wire funds to an account at Mellon Bank ending in 18K04 and maintained in the name of “Merrill
28 Lynch Account” and Theodore T. Chinen.

1 8. Chinen, Teddy Tanaka Associates, Coleman and Noble House International employed Bhak
2 to solicit potential investors through means of general solicitation. Bhak offered and sold the
3 securities of Teddy Tanaka Associates for compensation in the State of California.

4 9. Through means of general solicitation, Chinen and Trinity National offered or sold investment
5 contracts of Trinity National, referred to as a Project Funding Agreement, of at least \$10,000 per
6 investment for the promised return of the same amount invested to be paid each month for ten
7 months. The purported purpose of the offering was to raise funds for participation in a profit-sharing,
8 large-trade program referred to as a Capital Enhancement Program to be run by Chinen and Trinity
9 National. Chinen and Trinity National promised to investors that they would perform any and all
10 actions under the Project Funding Agreement that were financially beneficial to all of the parties to
11 the agreement. Investors were told to wire funds to an account at Bank of America ending in 4865
12 and maintained in the name of Trinity National.

13 10. In connection with these offers and sales, Chinen and Trinity National represented to
14 investors that the offer to participate in the profit-sharing, large-trade program with a minimum
15 investment of \$10,000 was not a solicitation for an investment.

16 11. These securities were offered or sold in this state in issuer transactions. The Department of
17 Corporations has not issued a permit or other form of qualification authorizing any person to offer
18 and sell these securities in this state.

19 Based upon the foregoing findings, the California Corporations Commissioner is of the
20 opinion that the promissory notes of Teddy Tanaka Associates, Inc. and the Project Funding
21 Agreements of Trinity National, LLC are securities subject to qualification under the California
22 Corporate Securities Law of 1968 and are being or have been offered or sold without being qualified
23 in violation of Corporations Code section 25110. Pursuant to section 25532 of the Corporate
24 Securities Law of 1968, Theodore T. Chinen, also known as Teddy Tanaka, also known as Ted
25 Tanaka, Teddy Tanaka Associates, Inc., Trinity National, LLC, Gary Coleman, Noble House
26 International, Inc., and Noble House International, Ltd. are hereby ordered to desist and refrain from
27 the further offer or sale in the State of California of securities in the form of promissory notes of

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1 Teddy Tanaka Associates, Inc. and/or Project Funding Agreements of Trinity National, LLC unless
2 and until qualification has been made under the law, or unless exempt.

3 In addition, based upon the foregoing, the California Corporations Commissioner is of the
4 opinion that Allen W. Bhak has effected transactions in securities as a broker-dealer without having
5 first applied for, and secured from the Commissioner a certificate, authorizing him to act in that
6 capacity, in violation of section 25210 of the Corporate Securities Law of 1968. Pursuant to section
7 25532 of the Corporate Securities Law of 1968, Allen W. Bhak is hereby ordered to desist and refrain
8 from effecting any transaction in, or inducing or attempting to induce the purchase or sale of, any
9 security in this state, unless and until he has applied for and secured from the Commissioner a
10 certificate, then in effect, authorizing him to act in that capacity, or unless exempt.

11 Further, the California Corporations Commissioner is of the opinion that the securities of
12 Trinity National, LLC were offered or sold in this state by means of written or oral communications
13 which included an untrue statement of a material fact or omitted to state a material fact necessary in
14 order to make the statements made, in the light of the circumstances under which they were made, not
15 misleading, in violation of section 25401 of the Corporate Securities Law of 1968. Pursuant to
16 section 25532 of the Corporate Securities Law of 1968, Theodore T. Chinen, also known as Teddy
17 Tanaka, also known as Ted Tanaka, and Trinity National, LLC are hereby ordered to desist and
18 refrain from offering or selling or buying or offering to buy any security in the State of California,
19 including but not limited to the investment contracts referred to as a Project Funding Agreement, by
20 means of any written or oral communication which includes an untrue statement of a material fact or
21 omits to state a material fact necessary in order to make the statements made, in the light of the
22 circumstances under which they were made, not misleading.

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1 This Order is necessary, in the public interest, for the protection of investors and consistent
2 with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

3 Dated: July 17, 2007
4 Sacramento, California

5 PRESTON DuFAUCHARD
6 California Corporations Commissioner



7 By _____
8 SHARON A. LUERAS
9 Lead Corporations Counsel
10 Enforcement Division
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