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**STATE OF CALIFORNIA**  
**BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY**  
**DEPARTMENT OF BUSINESS OVERSIGHT**

TO: Trago International, Inc.  
Christopher T. Condon  
2215-B Renaissance Drive, Suite 16  
Las Vegas, Nevada 89119-6727

**DESIST AND REFRAIN ORDER**  
**(For violations of sections 25110 and 25401 of the Corporations Code)**

The Commissioner of Business Oversight (“Commissioner”) finds that:

1. At all relevant times, Trago International, Inc. (“Trago”) was a Delaware corporation with offices purportedly located at 2215-B Renaissance Drive, Suite 16, Las Vegas, Nevada 89119-6727.
2. At all relevant times, Christopher Condon (“Condon”) held himself out as the Chief Executive Officer, President and Secretary of Trago.
3. From at least August 2006, Trago and Condon offered and sold securities in this state in the form of common stock subscription agreements and promissory notes convertible into common stock and supposedly secured by Trago’s assets.
4. Trago and Condon sold these securities to investors for at least \$1 million.
5. The purported purpose of the investors’ money was to support and expand Trago’s tequila business operations. Trago and Condon represented to investors that Trago’s business was expanding and claimed to have contracts with major retailers for Trago’s tequila products.
6. Trago and Condon represented that the profits from these contracts and the expanding business would be used to pay back the principal and interest on the promissory notes and would increase the value of the common stock.
7. In connection with the offer and sale of these securities, Trago and Condon made, or caused to be made, misrepresentations of material fact or omitted to state material facts necessary in order to make the statements made, in the light of the circumstances under which they were made, not

1 misleading. These misrepresentations and omissions included, but are not limited to the following:

- 2 a. Trago and Condon failed to disclose that Trago was insolvent and petitioning for  
3 bankruptcy;
- 4 b. Trago and Condon misrepresented material business details, such as what distributor  
5 and retail contracts the company held;
- 6 c. Trago and Condon misrepresented that the investors' notes were secured by product  
7 sales estimated at \$1 million, when, in fact, Trago did not have \$1 million in product sales;
- 8 d. Trago and Condon misrepresented that the investors would receive back all of their  
9 principal plus interest.

10 8. These securities were offered or sold in this state in issuer transactions. The Department of  
11 Business Oversight has not issued a permit or other form of qualification authorizing any person to  
12 offer and sell these securities in this state.

13 Based on the foregoing findings, the Commissioner is of the opinion that the promissory notes  
14 sold by Trago and Condon are securities subject to qualification under the Corporate Securities Law  
15 of 1968 ("CSL") (Corp. Code, § 25000 et. seq.) and are being or have been offered or sold without  
16 being qualified or exempt, in violation of Corporations Code section 25110.

17 The Commissioner is of the opinion that the securities offered by Trago and Condon were  
18 offered in this state by means of written or oral communications that included untrue statements of  
19 material fact or omitted to state material facts necessary in order to make the statements made, in the  
20 light of the circumstances under which they were made, not misleading, in violation of Corporations  
21 Code section 25401.

22 Pursuant to Corporations Code section 25532, Trago International, Inc. and Christopher T.  
23 Condon are hereby ordered to desist and refrain from the further offer or sale of securities in this  
24 state, including, but not limited to promissory notes, unless and until qualification has been made  
25 under the CSL or unless exempt. Trago International, Inc. and Christopher T. Condon are also  
26 hereby ordered to desist and refrain from the further offer or sale in of securities in this state,  
27 including, but not limited to promissory notes, by means of any written or oral communication which  
28 includes an untrue statement of a material fact or omits to state a material fact necessary in order to

1 make the statements made, in the light of the circumstances under which they were made, not  
2 misleading.

3 This order is necessary, in the public interest, for the protection of investors and consistent  
4 with the purposes, policies, and provisions of the CSL.

5 Dated: January 23, 2017

JAN LYNN OWEN  
Commissioner of Business Oversight

7  
8 By \_\_\_\_\_  
9 MARY ANN SMITH  
10 Deputy Commissioner  
11 Enforcement Division  
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