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California Corporations Commissioner
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8 BEFORE THE DEPARTMENT OF CORPORATIONS
9 OF THE STATE OF CALIFORNIA

10 In the Matter of the)
California Corporations Commissioner,)
11) CRD No. 5016241
Complainant,) CRD No. 136757
12)
v.) STATEMENT OF ISSUES
13)
Neil Godbole and Trueblue Strategies, LLC,)
14)
Respondents,)
15)
For Order Barring From any Employment,)
16 Management or Control of Any Broker-Dealer)
17 or Investment Adviser.)
18)

19 The California Corporations Commissioner ("Commissioner") alleges, on information and
20 belief, as follows:

21 **I**
22 **INTRODUCTION AND JURISDICTION**

23 1. The Corporate Securities Law of 1968, set forth in Corporations Code section 25000
24 et seq., and California Code of Regulations, title 10, section 260.000 et seq., contain provisions
25 that govern persons who operate in the securities industry. To ensure the protection of the public,
26 the Legislature mandates that persons dealing in securities follow explicit legal requirements.
27 The Commissioner gives effect to these legislative mandates by promulgating comprehensive
28 regulations and by enforcing the Corporate Securities Law.

II
FACTS

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3 2. Respondent Neil Godbole (“Godbole”) is an individual who during relevant times resided
4 at 733 Front Street #703 San Francisco, California 94111. Respondent Trueblue Strategies, LLC, a
5 California limited liability company located at 20695 Rice Court, Saratoga, California 95070, is
6 owned and managed by Godbole. Respondent Trueblue Strategies, LLC, was the investment adviser
7 for Opulent Lite LP; a California limited partnership that operated as a hedge fund with
8 approximately 70 investors whose funds of approximately \$30 million were managed by Godbole.
9 Opulent Lite LP was co-located with Trueblue Strategies, LLC in Saratoga, California.

10 3. Godbole registered Trueblue Strategies, LLC as an investment adviser licensed with the
11 Securities and Exchange Commission (SEC) and the California Department of Corporations (DOC).
12 The Financial Industry Regulatory Authority (“FINRA”), previously the National Association of
13 Securities Dealers (“NASD”) maintains the qualification, employment and disclosure histories of
14 registered representatives and principals in its Central Registration Depository (“CRD”). FINRA
15 assigned Godbole an identification number through its Central Registration Depository (“CRD”).¹
16 According to FINRA, Godbole’s CRD number is 5016241. Since 2005, Godbole was the managing
17 member, financial and operations principal of Trueblue Strategies, LLC (CRD 136757).

18 4. The Department of Corporations regulates investment advisers and other persons who
19 work in the securities industry.

20 5. On December 1, 2010, the SEC issued an “Order Instituting Administrative and Cease-and-
21 Desist-Proceedings Pursuant to Section 203(f) and 203(k) of the Investment Advisers Act of 1940,
22 Making Findings and Imposing Remedial Sanctions and Cease-and-Desist Order” (File number 3-
23 14147) against Trueblue Strategies, LLC and Godbole for multiple securities violations including the
24 following: fraudulent and misleading conduct and providing false information to hedge fund
25 investors.

26 _____
27 ¹ The CRD is a centralized computer data bank that maintains information concerning the registration,
28 qualification, employment and disciplinary histories of persons employed in the securities industry.
These persons include registered representatives and broker-dealers such as Godbole and Trueblue
Strategies, LLC, respectively.

1 9. Corporations Code section 25215 provides that:

2 No order may be entered under Section 25212, 25213, or 25213.3, or
3 25252 except after notice to any person affected thereby (and, in the case
4 of an agent, to his employer or prospective employer if known to the
5 commissioner) of the intention of the commissioner to enter that order and
6 of the reasons therefore and that upon receipt of a request the matter will
7 be set down for hearing to commence within 15 business days after such
8 receipt unless the person affected consents to a later date. If no hearing is
9 requested within 30 days after the mailing of the notice and none is
10 ordered by the commissioner, the order may be entered without a hearing
11 to remain in effect until it is modified or vacated by the commissioner. In
12 the case of an original application for a certificate, that hearing shall be set
13 down to commence within 15 business days after receipt of a written
14 request by the applicant made 30 days or more after the filing of the
15 application, even though no notice by the commissioner has been given,
16 unless the applicant consents to a later date. If a hearing is requested or
17 ordered, it shall be held in accordance with the provisions of the
18 Administrative Procedure Act, (Chapter 5 (commencing with Section
19 11500) of Part 1 of Division 3 of Title 2 of the Government Code), and the
20 commissioner shall have all of the powers granted thereunder.

21 10. The SEC's Order and findings of Respondents' violations of the Investment Company Act
22 of 1940 are within the provisions of Corporations Code section 25212 subdivisions (d) and (e) and
23 provide grounds to bar Respondents pursuant to Corporations Code sections 25212 and 25213,
24 respectively.

25 **PRAYER**

26 **WHEREFORE**, based on the foregoing, the Commissioner finds it in the public interest and
27 prays that Respondents be barred from the securities industry.

28 Dated: January 26, 2011
San Francisco, California

PRESTON DuFAUCHARD
California Corporations Commissioner

By _____
Joan E. Kerst
Senior Corporations Counsel
Attorney for Complainant