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10 BEFORE THE DEPARTMENT OF BUSINESS OVERSIGHT  
11 OF THE STATE OF CALIFORNIA

12 In the Matter of:  
13 THE COMMISSIONER OF BUSINESS  
14 OVERSIGHT,  
15 Complainant,  
16 v.  
17 INGENUITY STREET INVESTING, LLC, an  
18 entity,  
19 Respondent.

IA LICENSE NO. 164287  
  
ORDER SUMMARILY REVOKING  
INVESTMENT ADVISER CERTIFICATE  
PURSUANT TO CORPORATIONS CODE  
SECTION 25242

21 TO: Ingenuity Street Investing, LLC  
22 14710 Vickery Place  
23 Saratoga, California 95070

24 Jan Lynn Owen, Commissioner of Business Oversight (Commissioner) of the Department of  
25 Business Oversight (DBO) finds that:

26 1. At all relevant times, Ingenuity Street Investing, LLC held a valid and unrevoked  
27 investment adviser certificate issued by the Commissioner on July 7, 2016, pursuant to Corporations  
28 Code section 25230. Ingenuity Street Investing, LLC is an investment adviser business located at

1 14710 Vickery Place, Saratoga, California 95070. Ingenuity Street Investing, LLC is a Delaware  
2 limited liability company.

3 2. On or about March 14, 2018, the Commissioner notified Ingenuity Street Investing,  
4 LLC that Ingenuity Street Investing, LLC must designate an email address to receive an online  
5 examination form. In response to the Commissioner's notification, Ingenuity Street Investing, LLC  
6 designated an email to receive the online examination form.

7 3. On or about October 1, 2018, the Commissioner sent the online examination to  
8 Ingenuity Street Investing, LLC to the email designated by Ingenuity Street Investing, LLC. The  
9 Commissioner informed Ingenuity Street Investing, LLC that the online examination must be  
10 completed and submitted by November 16, 2018.

11 4. The Commissioner sent four emails, dated October 15, 2018, October 26, 2018,  
12 November 5, 2018, and November 12, 2018, to Ingenuity Street Investing, LLC's designated email  
13 address, reminding Ingenuity Street Investing, LLC of the November 16, 2018 deadline to complete  
14 and submit the online examination.

15 5. Despite the Commissioner's efforts, Ingenuity Street Investing, LLC failed to timely  
16 complete and submit the online examination by the November 16, 2018 deadline.

17 6. On or about December 3, 2018, Ingenuity Street Investing, LLC filed a request to  
18 surrender the Investment Adviser certificate of Ingenuity Street Investing, LLC.

19 7. On or about December 14, 2018, the Commissioner issued an Order Imposing  
20 Conditions on Surrender of Certificate as Investment Adviser to Ingenuity Street Investing, LLC.  
21 The order refused Ingenuity Street Investing, LLC's request to surrender until, among other things,  
22 Ingenuity Street Investing, LLC completed the online examination issued on October 1, 2018 and the  
23 Commissioner determined what action, if any, would be taken on that examination.

24 8. As of the date of this order, Ingenuity Street Investing, LLC has not satisfied the  
25 conditions imposed by the Commissioner's Order Imposing Conditions on Surrender of Certificate  
26 as Investment Adviser.

27 9. Corporations Code section 25241 requires every investment adviser licensed by the  
28 Commissioner to maintain books and records, file reports with the Commissioner, and submit to

1 examination by the Commissioner, as the Commissioner deems necessary or appropriate in the  
2 public interest or for the protection of investors.

3 NOW THEREFORE, GOOD CAUSE SHOWING, it is hereby ORDERED under the  
4 provisions of Corporations Code section 25242, subdivision (c), that Ingenuity Street Investing,  
5 LLC's investment adviser certificate is summarily revoked for violations of section 25241. This  
6 revocation precludes Ingenuity Street Investing, LLC from engaging in normal investment adviser  
7 activities that solicit or facilitates new business, including for existing clients. This revocation does  
8 not preclude Ingenuity Street Investing, LLC from engaging in activities necessary to the winding  
9 down of the business such as liquidating transactions, transferring accounts, forwarding any checks  
10 received to clearing firms, responding to regulatory inquiries, and otherwise fielding client/customer  
11 inquiries for account servicing or document requests, among other things. This order is effective  
12 immediately.

13 This order is necessary, in the public interest, for the protection of investors and consistent  
14 with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

15 Dated: April 10, 2019

16 JAN LYNN OWEN  
17 Commissioner of Business Oversight

18  
19 By: \_\_\_\_\_  
20 MARY ANN SMITH  
21 Enforcement Division  
22 Department of Business Oversight  
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