

1 CLOTHILDE V. HEWLETT
Commissioner
2 MARY ANN SMITH
Deputy Commissioner
3 DANIEL P. O'DONNELL
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Counsel
5
6 Department of Financial Protection and Innovation
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10 BEFORE THE DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION
OF THE STATE OF CALIFORNIA

11 In the Matter of:

12 THE COMMISSIONER OF FINANCIAL
13 PROTECTION AND INNOVATION,

14 Complainant,

15 v.

16 HEDONOVA LLC, HEDONOVA RESEARCH
17 LLC, ALEXANDER CAVENDISH,

18 Respondents.

STATEMENT IN SUPPORT OF ORDER
LEVYING ADMINISTRATIVE
PENALTIES

(Cal. Corp. Code § 25252)

19 The Commissioner of Financial Protection and Innovation (Commissioner) is informed and
20 believes, and based upon such information and believe, alleges and charges as follows:

21 I.

22 **STATEMENT OF FACTS**

23 1. At all relevant times herein, Hedonova LLC (The Fund), is and was a Delaware
24 limited liability company, located at 633 West Fifth Street, Los Angeles, California 90071, operating
25 a public website (Hedonova.io), through which it conducted business.

26 2. At all relevant times, Hedonova Research LLC (Hedonova Research), is and was a
27 Delaware limited liability company, located at 8 The Green, Suite B, Dover, Delaware 19901,
28 operating as the managing member and Investment Manager of The Fund.

1 \$2,500.00 for each subsequent violation of Corporations Code section 25401, as listed low, for a total
2 amount of \$1,093,500.00 or according to proof:

- 3 i. First violation: \$1,000.00 for misrepresentation in paragraph 8a, made in
4 one transaction;
- 5 ii. Additional violations: \$2,500.00 for the misrepresentation in paragraph
6 8a, made in the remaining 145 transactions;
- 7 iii. Additional violations: \$2,500.00 for the misrepresentation in paragraph
8 8b, made in 146 transactions; and
- 9 iv. Additional violations: \$2,500.00 for the misrepresentation in paragraph
10 8c, made in 146 transactions.

11 The total amount of administrative penalties for violations of Corporations Code section 25401 is
12 \$1,093,500.00, or according to proof.

13 DATED: May 2, 2024
14 Sacramento, California

CLOTHILDE V. HEWLETT
Commissioner
Department of Financial Protection and Innovation

15 By _____
16 RYAN M. CASSIDY
17 Counsel
18 Enforcement Division
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