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

I

INTRODUCTION AND JURISDICTION

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

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

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

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

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

1 The CRD is a centralized computer data bank that maintains information concerning the registration, 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.
6. The SEC’s action against Respondents ordered Godbole to cease and desist from committing or causing any violations and barred him from association with any investment adviser among other sanctions.

III
RESPONDENTS’ VIOLATIONS AND THE ORDERS ISSUED CONSTITUTE GROUNDS TO BAR RESPONDENTS FROM THE SECURITIES INDUSTRY

7. Corporations Code section 25212 provides, in pertinent part:

The commissioner may, after appropriate notice and opportunity for hearing, by order censure, deny a certificate to, suspend for a period not exceeding 12 months or revoke the certificate of, any broker-dealer if the commissioner finds that the censure, denial, suspension, or revocation is in the public interest and that the broker-dealer . . . or any partner, officer, director, or branch manager of the broker-dealer, . . . or any person directly or indirectly controlling the broker-dealer, . . . or any agent employed by the broker-dealer while so employed has done any of the following:

* * *

(d) Is or has been subject to (1) any order of the Securities and Exchange Commission . . . (3) any other order of the commission or any administrator, association, or exchange referred to in this subdivision which is or has been necessary for the protection of any investor.

(e) Has willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940,. . . or of any rule or regulation under any of those statutes, or any order of the commissioner which is or has been necessary for the protection of any investor.

8. Corporations Code section 25213 provides that:

The commissioner may, after appropriate notice and opportunity for hearing, by order or censure, or suspend for a period not exceeding 12 months, or deny or bar from any position of employment, management or control of any broker-dealer or investment adviser, any officer, director, partner, agent, employee of, or person performing similar functions for, a broker-dealer, if the commissioner finds that such censure, suspension or bar is in the public interest and that such person has committed any act or omission enumerated in subdivision (e) . . . of Section 25212 . . . or is subject to any order specified in subdivision (d) of Section 25212.

STATEMENT OF ISSUES
9. Corporations Code section 25215 provides that:

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

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

PRAYER

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

Dated: January 26, 2011
San Francisco, California

PRESTON DuFAUCHARD
California Corporations Commissioner

By__________________________________________
Joan E. Kerst
Senior Corporations Counsel
Attorney for Complainant