

At the Ex Parte Part of the Supreme Court of the State of New York, 60 Centre Street, City and State of New York, on the 28 date of February 2024.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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In the matter of the Inquiry by THE PEOPLE OF THE STATE OF NEW YORK, by LETITIA JAMES, Attorney General of the State of New York,

Index No.: 450650/2024

Petitioner,

~~IN RE~~ EX PARTE  
ORDER PURSUANT TO  
GENERAL BUSINESS LAW  
§ 354

Pursuant to Article 23-A of the New York General Business Law in regard to the acts and practices of

VLADIMIR ARTAMONOV

Date Filed:

Respondent,

Present: Hon. Margaret A. Chan

in promoting the issuance, distribution, exchange, advertisement, negotiation, purchase, investment advice: or sale of securities in or from New York State.

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Upon the application in writing of Letitia James, Attorney General of the State of New York, for an order pursuant to General Business Law (“GBL”) § 354, and upon the reading and filing of the February 23, 2024 <sup>petition</sup> ~~affirmation~~ of Geoffrey R. Andreu (“Andreu Aff.”), with accompanying exhibits 1-15, the July 31, 2023 affidavit of Donald Anselment with accompanying exhibit (“Anselment Aff.”), the November 14, 2023 affidavit of Arndt Nicklisch (“Nicklisch Aff.”) with accompanying exhibits, the December 5, 2023 affidavit of Mei Shibata (“Shibata Aff.”) with accompanying exhibits, the December 11, 2023 affidavit of Adam Greenberg (“Greenberg Aff.”) with accompanying exhibits, the January 10, 2024 affidavit of Rahul Mehendale (“Mehendale Aff.”) with accompanying exhibits, the February 13, 2024 affirmation of Shalendra Ramadhin (“Ramadhin Aff.”) with accompanying exhibits, the

February 14, 2024 affirmation of Ed Jaffe (“Jaffe Aff.”) with accompanying exhibits, and the memorandum of law in support of Petitioner Letitia James, Attorney General of the State of New York’s *ex parte* application, pursuant to GBL § 354:

**WHEREAS** the Attorney General has determined to commence an action under Article 23-A of the GBL against the above-captioned Respondent, Vladimir Artamonov, and that the testimony of Respondent and the production of certain documents, books and records is material and necessary to the action that the Attorney General has determined to bring; and

**WHEREAS** pursuant to GBL § 354, it is this Court’s duty to grant the Attorney General’s application for an order directing the person mentioned in the application to appear before the Justice of the Supreme Court or referee designated in such order and answer such questions as may be put to them or to any of them under oath, and to produce such papers, documents and books and records; and

**WHEREAS** pursuant to GBL § 354, it appears that it is proper and expedient to grant certain preliminary injunctive relief against Respondent because alleged fraudulent practices of Respondents threaten continued and immediate injury to the public and that the potential dissipation of Respondents’ assets would render a judgment directing restitution or disgorgement ineffectual; it is hereby

**ORDERED** that Respondent Vladimir Artamonov, appear before ~~the Honorable~~ Special Referee  
Diego Santiago, Esq.  
~~Justice~~ of the Supreme Court, or any other Justice or Referee of this Court as may be directed, in Room 656, at the courthouse located at 60 Centre Street, New York, New York, or at any other place as this Court may direct, as follows: on the 29th of March, 2024, at 12:00 p.m. (circled), and on any adjourned date and time thereafter to turn over originals, wherever located, whether in their possession or control, or if the originals are

*date stipulated by the parties or directed by the assigned referee,*

unavailable, copies of all documents and communications responsive to the Subpoena *Duces Tecum* from the New York State Office of the Attorney General to Respondent Vladimir Artamonov, dated July 10, 2023 (the "July 10, 2023 Subpoena"), as well as all documents and communications concerning any non-investment expenses incurred by Artamonov's Charles Schwab Account from September 14, 2021 to the present, including but not limited to Respondent's communications with AirBNB concerning the \$1,977.09 charge in May 2022; and it is further

**ORDERED** that Respondent appear before ~~the Honorable~~ Special Referee Diego Santiago, Esq., ~~Justice~~ of the Supreme Court, or any other Justice or Referee of this Court as may be directed, in Room 656, at the courthouse located at 60 Centre Street, New York, New York, or at any other place as this Court may direct, as follows: on the 5<sup>th</sup> of ~~March~~ April, 2024, at 10:00 a.m./p.m., and on any adjourned date and time thereafter or on such date stipulated by the parties or directed by the assigned referee to testify under oath, and answer such questions as may be put to him by the Attorney General or a designated Assistant Attorney General; and it is further

**ORDERED** that Respondent is hereby preliminarily restrained from violating Article 23-A of the GBL, and from engaging in fraudulent, deceptive and illegal acts, and is further restrained and enjoined from employing any device, scheme or artifice to defraud or to obtain money or property by means of false pretense, representation or promise, including but not limited to:

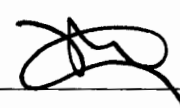
- a. Soliciting or receiving any thing of value for investment purposes, including but not limited to soliciting or receiving investments in "Project Information Arbitrage"; and
- b. Engaging in the issuance, exchange, purchase, sale, promotion, negotiation, advertisement, investment advice or distribution within or from this state of securities or commodities; and it is further

**ORDERED** that Respondent is hereby preliminary restrained from withdrawing, converting, transferring, selling or otherwise disposing of funds and assets held by any bank or brokerage account, wherever they may be situated, over which Respondent directly or indirectly exercises control or has an ownership interest; and it is further

**ORDERED** that service by personal delivery and leaving with Respondent a certified copy of this Order together with the papers upon which it was granted, on or before the 1<sup>st</sup> of March, 2024, be deemed sufficient service thereof; and it is further

**ORDERED** that in the event service by personal delivery, as set forth above, is attempted in good faith twice and is not completed, service of a certified copy of this Order together with the papers upon which it was granted shall be sufficient if, on or before the 5<sup>th</sup> of March, 2024, such papers are: (1) sent by registered or certified mail with return receipt requested to Respondent's last known address of 552 Summit Drive, Emerald Hills, CA 94062-3352; (2) emailed to Respondent's email address ([vartamonov1@gmail.com](mailto:vartamonov1@gmail.com)); and (3) personally delivered to the New York Secretary of State or a Deputy Secretary of State at the Office of the Department of State in the city of Albany.

Dated: New York, New York  
February 28, 2024

  
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**MARGARET A. CHAN**, J.S.C.  
**J.S.C.**