

STATE OF OREGON
DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
DIVISION OF FINANCIAL REGULATION

In the Matter of:

Case No. S-25-0025

RUBEN LEDESMA JR. aka
RUBEN LEDESMA HUDSON,
an Individual, and THE
ADVANCEMENT GROUP
INVESTMENT FUND LLC, a
Wyoming Limited Liability
Company,

FINAL ORDER TO CEASE AND
DESIST, FINAL ORDER DENYING
USE OF EXEMPTIONS, FINAL ORDER
ASSESSING CIVIL PENALTIES, AND
FINAL ORDER ASSESSING
RESTITUTION, ENTERED BY
DEFAULT

Respondents.

**AS AGAINST RESPONDENT RUBEN
LEDESMA HUDSON ONLY**

On June 17, 2025, the Director of the Department of Consumer and Business Services for the State of Oregon (“Director”), by and through the Division of Financial Regulation (“Division”), served an Order to Cease and Desist, Proposed Orders Denying Use of Exemptions, Assessing Civil Penalties, and Ordering Restitution, and Notice of Right to an Administrative Hearing (“Notice”) on Ruben Ledesma Jr. aka Ruben Ledesma Hudson (“Hudson”) and The Advancement Group Investment Fund LLC (“TAG”) (collectively, “Respondents”).

The Notice offered Respondents an opportunity for a hearing if requested within 20 days of service of the Notice.

The Notice further informed Respondents that the Director may issue a final order by default against any respondent that: 1) does not timely request a hearing within 20 days; 2) withdraws a request for hearing; 3) notifies the Division or administrative law judge that they will not appear; or 4) fails to appear at the scheduled hearing. The Notice designated the Division’s file on this matter as the record in this case.

On July 7, 2025, Hudson submitted a written hearing request to the Division via e-

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Labor and Industries Building
350 Winter Street NE, Suite 410
Salem, OR 97301-3881
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1 mail.¹

2 On or around November 18, 2025, the Office of Administrative Hearings (“OAH”)
3 provided Hudson with written notice that a hearing in this matter was scheduled to occur
4 via video conference on March 31, 2026.

5 On March 31, 2026, OAH convened a video conference hearing. Hudson failed to
6 appear at the hearing and Administrative Law Judge Fair dismissed Hudson’s hearing
7 request and closed the evidentiary record.

8 After considering the relevant portion of the Division’s file in this matter, the
9 Director finds that the record proves a prima facie case as against Hudson, such that an
10 Order of Default may be entered against such Respondent only.

11 FINDINGS OF FACT

12 The Director FINDS that:

13 1. TAG is a Wyoming limited liability company with a principal place of business
14 at 4213 Hermosa St., Corpus Christi, TX 78411.

15 2. At all relevant times, Hudson was TAG’s chief executive officer and managing
16 partner.

17 3. At all relevant times, Hudson acted on TAG’s behalf and controlled and
18 directed all actions of TAG. Hudson caused TAG to take or fail to take each action or
19 failure to act of TAG identified in this *Order to Cease and Desist, Proposed Order Denying*
20 *Use of Exemptions, Proposed Order to Assess Civil Penalties, and Notice of Right to an*
21 *Administrative Hearing.*

22 Misrepresentations Concerning TAG’s Business Activities

23 4. In or around July 2023, Hudson met Oregon consumer “KB” on an online social
24

25 ¹ The Division interpreted Hudson’s request as extending to TAG, as Hudson is TAG’s chief executive officer
26 and managing partner. TAG failed to have its hearing request ratified by a person allowed to practice law in
Oregon and its hearing request was deemed invalid. See Oregon Administrative Rules 137-003-0550(2) and
(4). On August 26, 2025, the Division issued a Default Order against TAG.





1 networking platform and they began exchanging messages.²

2 5. Shortly thereafter, Hudson described TAG’s business activities to KB,
3 claiming TAG “managed funds for high net [worth] individuals providing fixed returns of
4 10%.”

5 6. Hudson told KB that TAG engaged in “asset monetization” by “unlocking the
6 value of an underutilized asset.” He claimed the assets varied from gemstones to real
7 estate.

8 7. In or around August 2023, Hudson identified the following “loan investment
9 projects” TAG had conditionally approved pending underwriting approval:

- 10 A. A chartered aircraft purchase, valued at \$500 million;
- 11 B. The purchase of two banks with related improvements, valued at \$130
12 million;
- 13 C. A munitions manufacturing construction project, valued at \$25 million;
- 14 D. A land hotel development project, valued at \$15 million;
- 15 E. A gold mining project, valued at \$125 million;
- 16 F. An organic baby formula manufacturing project, valued at \$800 million;
- 17 and
- 18 G. A “health and wellness with nutritional component” project, valued at
19 \$1 billion.³

20 8. Hudson told KB that TAG would earn 2.5 - 3.5% of the value of each of the
21 foregoing projects.

22 9. Upon information and belief, at no time did TAG manage funds for high net
23 worth individuals and/or provide returns of any kind.

24 10. Upon information and belief, the foregoing projects were entirely fabricated,

25 ² Hudson maintained the alias of “Hudson” in his interactions with KB.

26 ³ Over the course of their relationship, Hudson represented that TAG was in the process of funding numerous other projects of a similar nature.

1 along with all subsequently-referenced projects.

2 11. Upon information and belief, at no time did TAG engage in any legitimate
3 business operations.

4 Investment Solicitations and Sale

5 12. As their relationship developed, Respondents offered financial enticements to
6 KB to promote the perception of Respondents as successful and well-resourced and prime
7 KB for investment solicitations. To this end, Hudson:

8 A. Offered KB a job as TAG's Director of Operations, with a salary of
9 \$200,000 plus bonuses; and

10 B. Offered to finance a \$650,000 home mortgage for KB with a 5% interest
11 rate.

12 13. At no time did Respondents formalize a job offer to KB and/or take meaningful
13 steps to make him a mortgage loan.

14 14. In or around September 2023, Respondents solicited KB to invest in TAG,
15 pitching numerous investment projects. The first was to contribute to the purchase of \$5.9
16 billion in uncut rubies for a monthly return of \$100 - \$110 million for ten months, with a
17 second purchase for \$4.73 billion for a monthly return of \$70 - \$80 million for ten months.

18 15. On or around September 22, 2023, Respondents solicited KB to invest in one
19 of two real estate projects:

20 A. Funding a 60-day \$250,000 bridge loan, secured by real estate; or

21 B. Funding a \$250,000 loan, secured by real estate, with a 10% return in
22 90 days.

23 16. On or around September 23, 2023, Hudson pressured and coerced KB to invest
24 with Respondents by claiming:

25 A. He had recently learned that the proposed investment in rubies could
26 result in much higher returns;





1 B. He needed to have funding in place for the real estate projects by
2 September 28, 2023; and

3 C. He'd give KB the right of first refusal to purchase Hudson's home in
4 three to five years.

5 17. On or around September 25, 2023, KB initiated a \$250,000 wire transfer from
6 his Chase Bank account to Hudson's Heritage Bank account. When asked, KB admitted
7 to not knowing exactly which project his investment was intended to fund.

8 18. On or around October 2, 2023, Hudson provided KB with a draft document
9 intended to formalize KB's investment. The document, titled "Joint Venture Agreement
10 ("JVA")," was sparse, contradictory, and vague. It described a venture to be managed by
11 Hudson on behalf of the "joint venture partners," who were not named. The purpose of the
12 agreement was to "invest the initial capital of \$250,000 provided by the partners to generate
13 a return of 12% in 120 days." The JVA stated that Hudson, as Managing Partner, was
14 responsible for making investment decisions but also that the unnamed joint venture
15 partners would meet to make joint investment decisions up to three times per year. The
16 JVA contained no description of specific investment projects.

17 19. The JVA, unsigned and back-dated to September 24, 2023, is the only
18 documentation KB received in connection with his investment.

19 20. At no time did Respondents provide KB with the following facts and
20 information regarding the investment in rubies described in Paragraphs (14) and (16):

- 21 A. A detailed description of business plans for the investment;
- 22 B. A financial balance sheet of the investments profit and loss; and/or
- 23 C. Detailed disclosures of the risks specific to the investment, including the
24 risks the projects would not produce the estimated returns.

25 21. KB did not have any control over the use of his investment funds.

26 22. KB did not play an active role in the Respondents' business operations and

1 relied on Respondents' efforts and purported experience to realize a return on his
2 investment.

3 Misuse of Investment Funds

4 23. At the time of KB's investment, Hudson's Heritage Bank account had a balance
5 of negative \$6.02.

6 24. In the course of investigation, the Director identified four additional bank
7 accounts held by Hudson. The Director identified no accounts held by TAG. Each of
8 Hudson's accounts had low, often negative, balances in the months preceding KB's wire
9 transfer. The account records showed no consistent source of income for Respondents.

10 25. In the three days following KB's wire transfer, Hudson spent approximately
11 \$15,000 on retail purchases, cash withdrawals, and transfers to various personal accounts.

12 26. On or around September 28, 2023, Heritage Bank placed restrictions on
13 Hudson's account due to concerns that the rapid outflow of funds reflected fraudulent
14 activity.

15 27. At Hudson's prompting, KB communicated to Chase Bank that the wire transfer
16 and subsequent expenditures were not related to fraudulent activity.

17 28. On or around October 4, 2023, Heritage Bank lifted the restrictions on Hudson's
18 account. Hudson resumed making personal expenditures with KB's funds.

19 29. Hudson did not inform KB that Heritage Bank lifted the restrictions on his
20 account. Instead, he falsely claimed the restrictions remained in place and offered to refund
21 KB's investment once he regained access to the funds. In the meantime, he began
22 distancing himself from KB, claiming he was unavailable due to travel plans and
23 commitments to Respondents' various projects.

24 30. On or around October 10, 2023, Heritage Bank closed Hudson's account due to
25 fraud-related concerns and issued him a check for \$228,882.98, the balance of KB's funds.
26 Hudson deposited the check into a personal Umpqua Bank account and continued making





1 personal expenditures with the funds.

2 31. On or around November 16, 2023, Hudson reiterated his offer to refund KB his
3 initial investment, plus interest, once the funds became available. At this point, Hudson
4 had spent approximately \$212,000 of KB's funds. This was the last communication
5 between Hudson and KB.

6 32. By on or around December 28, 2023, Hudson had spent virtually all of KB's
7 funds for personal enrichment unrelated to any legitimate business or investment activities.
8 Hudson's expenditures included:

9 A. \$73,159 in cashier's checks, of which \$72,460 were issued directly to
10 Hudson;

11 B. \$68,123.20 in Peer-to-Peer and Account-to-Account transfers, the vast
12 majority of which were transferred to Hudson's PayPal, Venmo, CashApp, and
13 Apple Cash accounts;

14 C. \$29,999 to the State of Texas to satisfy Hudson's child support arrears;

15 D. \$23,780.07 in retail purchases;

16 E. \$23,218.58 in personal expenses, including massages, hair and nail
17 salons, dry cleaning, and chiropractic and dental services;

18 F. \$18,034.82 in cash withdrawals;

19 G. \$5,075.41 in personal travel expenses; and

20 H. \$5,000 to satisfy Hudson's credit card debt.

21 33. Respondents failed to pay KB pursuant to the terms of the JVA. They only returned
22 \$699 to KB, issued via a cashier's check.

23 Criminal History and Registration/Licensing Failures

24 34. Hudson failed to inform KB that he had been convicted of felonies as follows:

25 A. On February 5, 2001, he was convicted of an undisclosed felony;⁴

26 ⁴ See Texas case number 99-CR-1637A.



1 B. On May 26, 2006 he was convicted of motor vehicle theft;⁵ and

2 C. On April 10, 2025, he was convicted of Theft Valued at \$1,500 to
3 \$20,000.⁶

4 35. At no time did Respondents register KB’s investment with the Director
5 pursuant to ORS 59.055.

6 36. At no time have Respondents held an Oregon broker-dealer or securities
7 salesperson license, or otherwise been licensed with the Director to sell securities in
8 Oregon pursuant to ORS 59.165.

9 CONCLUSIONS OF LAW

10 The Director CONCLUDES that:

11 37. The investment Respondents sold to KB is a “security” under ORS
12 59.015(19)(a), as it is either an “investment contract” or “evidence of indebtedness.” It is
13 an investment contract because KB invested money in a common enterprise with the
14 expectation of profit to be made by the management and control of others.

15 38. By offering and selling the investment to KB, Respondents “sold” a security,
16 under ORS 59.015(17)(a) and (b), and transacted business as “securities salespersons”
17 under ORS 59.015(18)(a).

18 39. By offering and selling a security to KB without being licensed under the
19 Oregon Securities Law, Respondents violated ORS 59.165(1).

20 40. By selling an unregistered security to KB, Respondents violated ORS 59.055.

21 41. Respondents made the following misrepresentations in connection with the sale
22 of a security to KB, in violation of ORS 59.135(2):

23 A. TAG “managed funds for high net [worth] individuals providing fixed
24 returns of 10%;

25
26 ⁵ See Arkansas case number SS-05-3457CR.

⁶ See Texas case number 296-82033-2014.



1 B. TAG was managing the investment projects identified in Paragraphs (7)
2 and (14) – (15), for which it earned 2.5- 3.5% of the projects’ value;

3 C. The ruby project could result in higher returns than previously
4 projected, as set forth in Paragraph (16)(B); and

5 D. Respondents would use KB’s investment funds in furtherance of the
6 specified investment projects.

7 42. Respondents omitted to state the following material facts in connection with the
8 sale of a security to KB, in violation of ORS 59.135(2):

9 A. A detailed description of business plans for the investment in rubies
10 described in Paragraphs (14) and (16);

11 B. A financial balance sheet of the profit and loss for the investment in
12 rubies;

13 C. Detailed disclosures of the risks specific to the investment in rubies,
14 including the risks the project would not produce the estimated returns; and

15 D. That Hudson had been convicted of numerous felonies, including two
16 theft convictions.

17 43. Respondents employed a device, scheme, or artifice to defraud KB, in violation
18 of ORS 59.135(1), and engaged in an act, practice, or course of business which operated
19 as a fraud or deceit upon KB, in violation of ORS 59.135(3), by:

20 A. Falsely claiming that TAG managed large investment projects for high
21 net worth clients which produced significant returns and business revenue, when it
22 had no legitimate presence and produced no income;

23 B. Coercing KB’s investment through lucrative promises of employment,
24 a personal mortgage, and the purchase of Hudson’s personal residence;

25 C. Coercing KB’s investment by representing that KB had only five days
26 to decide whether to invest; and



1 D. Perpetuating the misrepresentation that KB's investment funds were
2 unavailable to prevent him from discovering that Hudson was rapidly spending the
3 funds for his personal enrichment, as set forth in Paragraphs (25) – (33).

4 44. Because the Director has reason to believe that Respondents have engaged, are
5 engaging, or are about to engage in violations of the Oregon Securities Law, the Director
6 may issue an order to Respondents to cease and desist from violations of the Oregon
7 Securities Law under ORS 59.245(4).

8 45. Because the Director has reason to believe that Respondents have engaged or
9 are about to engage in violations of the Oregon Securities Law, or that the use of any
10 exemption by Respondents would work a fraud or imposition on purchasers, the Director
11 may deny Respondents the use of exemptions to the securities registration requirements
12 under ORS 59.045(2).

13 46. The Director may impose a civil penalty of up to \$20,000 *per violation* upon
14 any person who violates, or who procures, aids or abets the violation of, the Oregon
15 Securities Law, under ORS 59.995(1).

16 47. The Director may order a person whose acts, omissions, practices, operations
17 or violation of ORS 59.005 to 59.505 and 59.710 to 59.830 or a rule or order of the director
18 causes harm to another person to pay restitution to the other person, under ORS 59.995(4).

19 ORDERS

20 Now therefore, the Director issues the following ORDERS as against Hudson only:

21 48. As authorized by ORS 59.245(4), the Director hereby ORDERS Hudson to
22 CEASE AND DESIST from violating ORS 59.055, ORS 59.135(1), (2), and (3), and ORS
23 59.165(1).

24 49. As authorized by ORS 59.045(2), the Director hereby DENIES Hudson, and
25 any successor business entity or any business entity owned, operated, or controlled by
26 Hudson, the use of exemptions that would otherwise be available to Hudson under ORS

1 59.025 and ORS 59.035, concerning securities and transactions exempt from the
2 registration requirements of the Oregon Securities Law.

3 50. As authorized by ORS 59.995(1), the Director hereby ORDERS that Hudson
4 pay a CIVIL PENALTY totaling \$80,000 as follows:

- 5 A. \$20,000 for violating ORS 59.055.
- 6 B. \$20,000 for violating ORS 59.135(2);
- 7 C. \$20,000 for violating ORS 59.135(1) and (3); and
- 8 D. \$20,000 for violating ORS 59.165(1).

9 51. As authorized by ORS 59.995(4), the Director hereby ORDERS that Hudson
10 pay RESTITUTION to KB totaling \$249,301.

11 52. This is a “Final Order” under ORS 183.310(6)(b). Subject to this provision, the
12 entry of this Order does not limit further remedies that may be available to the Director
13 under Oregon law.

14
15 SO ORDERED this 31st day of March, 2026.

16
17 SEAN E. O’DAY, Director
Department of Consumer and Business Services

18
19 /s/ Dorothy Bean
20 Dorothy Bean, Chief of Enforcement
Division of Financial Regulation

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NOTICE OF RIGHT TO JUDICIAL APPEAL

You are entitled to judicial review of this order in accordance with ORS 183.482.
You may request judicial review by filing a petition with the Court of Appeals in Salem,
Oregon, within 60 days from the date this order is served.

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