

DENISE VOIGT CRAWFORD
SECURITIES COMMISSIONER



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Texas State Securities Board

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Phone: (512) 305-8300
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IN THE MATTER OF
SUNNY KOHLI

§
§

Order No. IC10-CDO-19

TO: Sunny Kohli
P.O. Box 1933
Laguna Beach, CA 92652

DISCIPLINARY ORDER

Be it remembered that Sunny Kohli ("Respondent") appeared before the Securities Commissioner of the State of Texas ("Securities Commissioner") and consented to the entry of this Order and the Undertaking and Findings of Fact and Conclusions of Law contained herein.

FINDINGS OF FACT

1. Respondent has waived (a) Respondent's right to notice and hearing in this matter; (b) Respondent's right to appear and present evidence in this matter; (c) Respondent's right to appeal this order; and (d) all other procedural rights granted to Respondent by the Securities Act, TEX. REV. CIV. STAT. ANN. art 581-1 et seq. (Vernon 1964 & Supp. 2009) ("Texas Securities Act") and the Administrative Procedure Act, TEX. GOV'T CODE ANN. § 2001.001 et seq. (Vernon 2008 & Supp. 2009) ("Administrative Procedure Act").
2. From in or about December 2005 to in or about March 2009, Respondent engaged in the sale of limited partnership interests issued by various affiliates of Triton Financial, LLC to Texas residents.
3. Ultimately, the Texas residents that Respondent introduced to Triton Financial invested over \$7.5 million dollars in investments issued by Triton Financial's affiliates.
4. Respondent has never been registered with the Securities Commissioner as a dealer.

UNDERTAKING

Respondent undertakes and agrees that he will not act as a "dealer", "agent", "investment adviser", or "investment adviser representative" in the State of Texas (as those terms are defined by Section 4 of the Texas Securities Act) for a period of two (2)

years from the date of this Order. Respondent further undertakes and agrees that he will not apply for registration with the Securities Commissioner as a dealer, agent, investment adviser, or investment adviser representative for a period of two (2) years from the date of this Order.

CONCLUSIONS OF LAW

1. The limited partnership interests sold by Respondent constitute "securities" as the term "securities" is defined by Section 4.A of the Texas Securities Act.
2. During the period from in or about December 2005 to in or about March 2009, Respondent was a "dealer" in Texas as the term "dealer" is defined by Section 4.C of the Texas Securities Act.
3. Respondent's sales of the limited partnership interests issued by affiliates of Triton Financial to Texas residents constitute violations of Section 12.A of the Texas Securities Act.
4. Pursuant to Section 23.A of the Texas Securities Act, Respondent's violations of Section 12.A of the Texas Securities Act constitute bases for the Securities Commissioner to order that Respondent cease and desist acting as a dealer or agent.

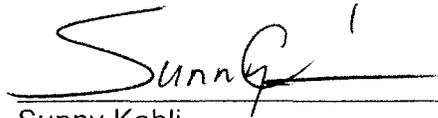
ORDER

1. It is therefore ORDERED that Sunny Kohli CEASE AND DESIST from acting as a dealer or agent in violation of the Texas Securities Act.
2. It is further ORDERED that Sunny Kohli COMPLY with the terms of the Undertaking contained herein.

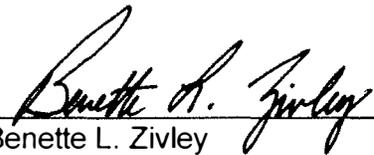
SIGNED AND ENTERED BY THE SECURITIES COMMISSIONER this 15th
day of September, 2010.

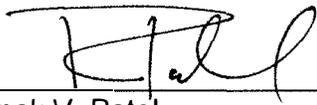

DENISE VOIGT CRAWFORD
Securities Commissioner

Respondent:


Sunny Kohli

Approved as to Form:

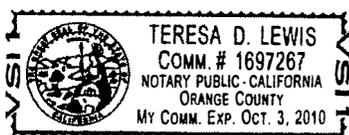

Benette L. Zivley
Director
Inspections and Compliance Division


Ronak V. Patel
Assistant Director
Inspections and Compliance Division

ACKNOWLEDGMENT

On the 14 day of September, 2010, Sunny Kohli ("Respondent") personally appeared before me, executed the foregoing Order and acknowledged that:

1. Respondent has read the foregoing Order;
2. Respondent has been fully advised of his rights under the Texas Securities Act and the Administrative Procedure Act;
3. Respondent knowingly and voluntarily consents to the entry of the foregoing Order and the Findings of Fact and Conclusions of Law contained therein; and
4. Respondent, by consenting to the entry of the foregoing Order, has knowingly and voluntarily waived his rights as set forth therein.



[affix notary seal here]


Notary Public in and for
the State of California

My commission expires on: 10-03-2010