DENISE VOIGT CRAWFORD SECURITIES COMMISSIONER

JOHN R. MORGAN
DEPUTY SECURITIES COMMISSIONER

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Texas State Securities Board

208 E. 10th Street, 5th Floor Austin, Texas 78701-2407 www.ssb.state.tx.us BETH ANN BLACKWOOD CHAIR

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| IN THE MATTER OF | § | | |
|--------------------|---|-----------|-------------|
| MICHAEL DAVID COUR | § | Order No. | IC10-CDO-18 |

TO: Michael David Cour (CRD No. 2301856) 3309 Shell Road

Georgetown, TX 78628

DISCIPLINARY ORDER

Be it remembered that Michael David Cour ("Respondent") appeared before the Securities Commissioner of the State of Texas ("Securities Commissioner") and consented to the entry of this Order ("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. (Vernon1964 & 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").

Relevant Registration History

- 2. From November 11, 2002 through September 4, 2007, Respondent was registered with the Securities Commissioner as an agent of Veritrust Financial, LLC.
- During the period from March 2007 through October 2009, Respondent submitted applications for registration as an investment adviser representative of Triton Financial, LLC ("Triton Financial"). However, Respondent was never registered with the Securities Commissioner as an investment adviser representative of Triton Financial.

Sale of Triton Financial Investments

- 4. From in or about March 2005 to in or about September 2009, Respondent engaged in the sale of limited partnership interests in various affiliates of Triton Financial.
- 5. Respondent raised over \$14 million dollars in investor funds for the Triton Financial affiliates.
- 6. Respondent did not sell the Triton Financial related limited partnership interests on behalf of Veritrust. Furthermore, 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 five (5) 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 five (5) 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 March 2005 to in or about September 2009, Respondent was a "dealer" 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 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.

<u>ORDER</u>

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

SIGNED AND ENTERED BY THE SECURITIES COMMISSIONER this // day of / dualist , 2010.

DENISE VOIGT **C**RAWFORD

Securities Commissioner

Respondent:

Michael David Cour

Approved as to Form:

Benette L. Zivley

Director

Inspections and Compliance Division

Lance T. Lackey, Esq.

Attorney for Respondent

Ronak V. Patel

Attorney

Inspections and Compliance Division

ACKNOWLEDGMENT

On the 6th day of August , 2010, Michael David Cour ("Respondent") personally appeared before me, executed the foregoing Order and acknowledged that:

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

Notary Public in and for the State of Theas

My commission expires on: $129-201^2$

[affix notary seal here]

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