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STATE OF CALIFORNIA
BUSINESS, TRANSPORTATION AND HOUSING AGENCY
DEPARTMENT OF CORPORATIONS

TO: Sarah Frenczak
Anita Gross
Triton Group, L.L.C.
2750 Polk Street, Apt. 5
San Francisco, CA 94109

ORDER WITHDRAWING
DESIST AND REFRAIN ORDER

It is hereby ordered that the Desist and Refrain Order issued on March 29, 2010 against Sarah Frenczak, Anita Gross, and Triton Group, LLC, is withdrawn.

Dated: April 26, 2010
Los Angeles, California

Preston DuFauchard
California Corporations Commissioner

By _____
ALAN S. WEINGER
Deputy Commissioner

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STATE OF CALIFORNIA
BUSINESS, TRANSPORTATION AND HOUSING AGENCY
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TO: Sarah Frenczak
Anita Gross
Triton Group, L.L.C.
2750 Polk Street, Apt. 5
San Francisco, CA 94109

DESIST AND REFRAIN ORDER
(For violations of section 25210 of the Corporations Code)

The California Corporations Commissioner finds that:

1. Triton Group, L.L.C. (“Triton”), is a California limited liability company formed on November 16, 2006. At all relevant times, Sarah Frenczak (“Frenczak”) and Anita Gross (“Gross”) were principals and managers of Triton and had a business address of 2750 Polk Street, Apt. 5, San Francisco, CA 94109.

2. On October 1, 2007 Triton, Frenczak and Gross entered into an agreement with a corporation in Wisconsin interested in financing development of its real estate projects. Among other things, Triton, Frenczak and Gross agreed to provide private placement and other advice in connection with structuring, issuance and financing, and to prepare offering documents for, and find private investors to invest in, a contemplated private placement offering of approximately \$35 million. It was agreed that in addition to a fee, Triton, Frenczak and Gross were to receive a commission of four percent for each privately financed transaction.

3. Following the execution of the agreement, Triton, Frenczak and Gross solicited prospective investors and attempted to induce the purchase of securities from this Wisconsin corporation, but failed to produce investors or provide funding.

4. The activities undertaken by Triton, Frenczak and Gross were those of a broker dealer. At the time they entered into this agreement, Triton, Frenczak and Gross were not certified with the

1 California Corporations Commissioner to act as a broker-dealer, and they did not disclose their lack
2 of certification to their client, the Wisconsin corporation.

3 Based upon the foregoing findings, the California Corporations Commissioner is of the
4 opinion that Triton Group LLC, Sarah Frenczak and Anita Gross have acted as a broker-dealer
5 without a certificate authorizing them to act in that capacity, in violation of Corporations Code
6 section 25210. Pursuant to Corporations Code section 25532, Triton Group LLC, Sarah Frenczak
7 and Anita Gross are hereby ordered to desist and refrain from effecting any transaction in, or
8 inducing or attempting to induce the purchase or sale of, any security in this state, unless and until
9 they have applied for and obtained from the Commissioner a certificate authorizing them to act in
10 that capacity.

11 This Order is necessary, in the public interest, for the protection of investors, and consistent
12 with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

13 Dated: March 29, 2010
14 Los Angeles, California

Preston DuFauchard
California Corporations Commissioner

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17 By _____
18 ALAN S. WEINGER
19 Deputy Commissioner
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