

1 revoke, deny, or suspend a registration of a registrant and/or assess
2 penalties pursuant to RSA Chapter 399-G. RSA 399-G:18, RSA 399-G:19
3 and RSA 399-G:21.

4 **Facts**

- 5 5. From October 2007, Keefe has conducted money transmitter activity for
6 New Hampshire consumers without a valid Money Transmitter license
7 issued by the Department.
- 8 6. Keefe has cooperated and provided the information to show it did
9 conduct business in New Hampshire prior to obtaining a Money
10 Transmitter License from the Department.

11 **Violation(s) of Law and Penalties**

- 12 7. Keefe is a "Person" as defined by RSA 399-G:1,X.
- 13 8. Keefe may be assessed an administrative fine not to exceed \$2,500.00
14 for each violation of RSA Chapter 399-G. RSA 399-G:21,IV and V.

15 **Respondent's Consent**

- 16 9. Keefe does not deny the facts, statements, or violations
17 contained herein and Keefe hereby agrees to the entry of this Consent
18 Order.
- 19 10. Keefe has voluntarily entered into this Consent Order without reliance
20 upon any discussions between the Department and Keefe, without promise
21 of a benefit of any kind (other than concessions contained in this
22 Consent Order), and without threats, force, intimidation, or coercion
23 of any kind. Keefe further acknowledges its understanding of the
24 nature of the allegations set forth in this action, including the
25 potential penalties provided by law.

1 11. Keefe hereby acknowledges, understands, and agrees that there is the
2 right to notice, hearing, and/or a civil action and hereby waives said
3 rights.

4 **Order**

5 12. **Whereas pursuant to RSA 399-G:20,VI** finding this Consent Order
6 necessary, appropriate and in the public interest and consistent with
7 the intent and purposes of New Hampshire banking laws, the Department
8 Orders as follows:

9 a. Keefe shall pay to the Department \$5,000.00 in administrative
10 penalties, payable contemporaneously with Keefe's signing of
11 this Consent Order; and

12 b. The check shall be bank check or guaranteed funds and made
13 payable to "State of New Hampshire".

14 13. This Consent Order may be revoked and the Department may pursue any
15 and all remedies available under law, if the Department later finds
16 that Keefe knowingly or willfully withheld information used and relied
17 upon in this Consent Order.

18 14. This Consent Order is binding on all heirs, assigns, and/or successors
19 in interest.

20 15. This Consent Order shall become effective upon the date the
21 Commissioner signs this Consent Order.

22 16. Once this Consent Order is effective, the Department agrees not to
23 seek further reimbursement, refunds, penalties, fines, costs, or fees
24 regarding the facts, allegations, or findings of violations contained
25 herein.

1 **WHEREFORE**, based on the foregoing, we have set our hands to this Consent
2 Order, upon its execution by Ronald A. Wilbur, Bank Commissioner.

3
4 Recommended this 1st day of December, 2011 by

5 _____
6 /s/

7
8 Maryam Torben Desfosses, Hearings Examiner, Banking Department

9
10 Executed this 30th day of November, 2011 by

11 _____
12 /s/

13
14 Russell Willey, LLC Manager on behalf of Keefe Commissary Network, L.L.C.

15
16 **SO ORDERED.**

17 _____
18 /s/

19
20 Ronald A. Wilbur,
21 Bank Commissioner

22 Dated: 12/01/11