



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

5 **Facts**

6 5. From August 18, 2006 until May 24, 2011, Tempus had conducted money  
7 transmitter activity for New Hampshire consumers without a valid Money  
8 Transmitter license issued by the Department until May 25, 2011.

9 6. From August 18, 2006 until May 24, 2011, Tempus conducted a total of  
10 1,704 unlicensed money transmissions for 35 New Hampshire consumers.  
11 Fees charged for the 35 New Hampshire consumers (Consumer 1 through  
12 35) total \$21,988.00 as follows:

13 Consumer 1: \$5,577.00;	Consumer 19: \$84.00;
14 Consumer 2: \$180.00;	Consumer 20: \$40.00;
15 Consumer 3: \$280.00;	Consumer 21: \$180.00;
16 Consumer 4: \$9,400.00;	Consumer 22: \$60.00;
17 Consumer 5: \$67.00;	Consumer 23: \$0.00;
18 Consumer 6: \$80.00;	Consumer 24: \$130.00;
19 Consumer 7: \$1,580.00;	Consumer 25: \$80.00;
20 Consumer 8: \$740.00;	Consumer 26: \$225.00;
21 Consumer 9: \$250.00;	Consumer 27: \$50.00;
22 Consumer 10: \$0.00;	Consumer 28: \$180.00;
23 Consumer 11: \$0.00;	Consumer 29: \$60.00;
24 Consumer 12: \$660.00;	Consumer 30: \$60.00;
25 Consumer 13: \$110.00;	Consumer 31: \$10.00;

1 Consumer 14: \$50.00; Consumer 32: \$200.00;  
2 Consumer 15: \$320.00; Consumer 33: \$10.00;  
3 Consumer 16: \$50.00; Consumer 34: \$200.00; and  
4 Consumer 17: \$60.00; Consumer 35: \$20.00.  
5 Consumer 18: \$1155.00;

6 7. Tempus has cooperated and provided the information to show it did  
7 conduct business in New Hampshire prior to obtaining a Money  
8 Transmitter License from the Department.

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

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

13 **Respondent's Consent**

14 10. Tempus does not deny the facts, statements, or violations contained  
15 herein and Tempus hereby agrees to the entry of this Consent Order.  
16 11. Tempus has voluntarily entered into this Consent Order without  
17 reliance upon any discussions between the Department and Tempus,  
18 without promise of a benefit of any kind (other than concessions  
19 contained in this Consent Order), and without threats, force,  
20 intimidation, or coercion of any kind. Tempus further acknowledges its  
21 understanding of the nature of the allegations set forth in this  
22 action, including the potential penalties provided by law.  
23 12. Tempus hereby acknowledges, understands, and agrees that there is the  
24 right to notice, hearing, and/or a civil action and hereby waives said  
25 rights.

Order

1  
2 13. Whereas pursuant to RSA 399-G:20,VI finding this Consent Order  
3 necessary, appropriate and in the public interest and consistent with  
4 the intent and purposes of New Hampshire banking laws, the Department  
5 Orders as follows:

6 a. Tempus shall reimburse Consumers 1 through 35 the fees charged  
7 as described in Paragraph 6 above, payable contemporaneously  
8 with Tempus' signing of this Consent Order. Each check should be  
9 made out to the specific consumer and submitted to the  
10 Department along with current contact information to forward to  
11 the consumer;

12 b. Tempus shall pay to the Department \$2,500.00 in administrative  
13 penalties for unlicensed activity from 2006 through and 2010,  
14 payable contemporaneously with Tempus' signing of this Consent  
15 Order; and

16 c. All checks shall be bank check or guaranteed funds and made  
17 payable to "State of New Hampshire" with the exception for those  
18 made out to Consumers.

19 14. This Consent Order may be revoked and the Department may pursue any  
20 and all remedies available under law, if the Department later finds  
21 that Tempus knowingly or willfully withheld information used and  
22 relied upon in this Consent Order.

23 15. This Consent Order is binding on all heirs, assigns, and/or successors  
24 in interest.

25 16. This Consent Order shall become effective upon the date the

1 Commissioner signs this Consent Order.

2 17. Once this Consent Order is effective, the Department agrees not to  
3 seek further reimbursement, refunds, penalties, fines, costs, or fees  
4 regarding the facts, allegations, or findings of violations contained  
5 herein.

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

8  
9 Recommended this 4th day of August, 2011 by

10 \_\_\_\_\_  
/s/

11 Maryam Torben Desfosses, Hearings Examiner, Banking Department

12 Executed this 10th day of August, 2011 by

13 \_\_\_\_\_  
/s/

14 Keinan Ashkenazi, Principal, on behalf of Tempus Consulting, Inc.

15  
16 **SO ORDERED.**

17  
18 \_\_\_\_\_  
/s/  
19 Ronald A. Wilbur,  
Bank Commissioner

Dated: 08/12/2011