

**STATE OF NEW HAMPSHIRE  
BANKING DEPARTMENT**

In The Matter of: Kiki Indotransfer, Felix Suwandy, and Fella Stevani  
Case No. 13-051

**CONSENT ORDER**

**WHEREAS**, pursuant to RSA 399-G, the New Hampshire Banking Department (“Department”) is charged with regulating persons that “engage in the business of money transmission” in New Hampshire or with New Hampshire consumers.

**WHEREAS**, pursuant to RSA 399-G:13, I, the Department is authorized to examine the business affairs of any licensee or non-licensee money transmitter to determine compliance with the RSA 399-G.

**WHEREAS**, Kiki Indotransfer was a Somersworth, New Hampshire company that registered as a money transmitter with the Financial Crimes Enforcement Network (“FinCEN”) in April of 2011. Kiki Indotransfer was neither registered with the New Hampshire Secretary of State nor a licensed New Hampshire Money Transmitter.

**WHEREAS**, Felix Suwandy was a co-owner of Kiki Indotransfer.

**WHEREAS**, Fella Stevani was a co-owner of Kiki Indotransfer.

**WHEREAS**, pursuant to its authority under RSA 399-G:13, I, the Department, through the Consumer Credit Division, conducted an investigation of Kiki Indotransfer, Fella Stevani and Felix Suwandy (collectively, “Respondents”).

**WHEREAS**,

1. Respondents conducted 510 unlicensed money transmissions to Indonesia from 2011 to 2012 without a New Hampshire Money Transmitter license.
2. Respondents ceased further money transmitter activity in July of 2012.

3. Respondents fully cooperated with the Department.

**WHEREAS**, Respondents make the following acknowledgements:

1. Respondents acknowledge that were an administrative hearing to be held in this matter, the Department would introduce evidence demonstrating that Respondents violated RSA 399-G:2, I.
2. Respondents voluntarily enter into and sign this Consent Order without reliance upon any discussions between the Department and Respondents, without the promise of a benefit of any kind (other than the concessions contained in this Consent Order), and without threats, force, intimidation or coercion of any kind.
3. The conduct described above, if proven, would constitute violations of state law, which could result in penalties pursuant to RSA 399-G:23, II through IV.
4. Respondents acknowledge, understand, and agree that they have the right to notice and an adjudicatory hearing to contest the matters set forth herein, including any appeal, and hereby waive those rights. Respondents further acknowledge they waive the filing of any civil actions related to this Consent Order.
5. Respondents understand that their action in entering this Consent Order is a final act and not subject to reconsideration or judicial review or appeal.
6. Respondents understand the nature of the allegations set forth herein and that they constitute grounds for potential sanctions, as provided by law.
7. Respondents represent and warrant that they have all the necessary rights, powers and abilities to carry out the terms of this Consent Order.
8. Respondents acknowledge that the Department is relying upon Respondents' representations and warranties stated herein in making its determinations in this

matter.

9. Respondents acknowledge that this Consent Order may be revoked and the Department may pursue any and all remedies available under the law against Respondents if the Department later learns that Respondents knowingly or willfully withheld information from the Department.
10. This Consent Order is binding on all heirs, assigns and successors in interest.

**WHEREAS**, Respondents each consent to the Department imposing the following sanctions:

1. Respondents shall cease and desist from money transmitter activity in New Hampshire without a valid New Hampshire Money Transmitter license.
2. Respondents shall jointly remit a total penalty in the amount of \$2,000 by bank check to the “State of New Hampshire.” Such payment shall be made contemporaneously with Respondents’ execution of this Consent Order.
3. Failure by Respondents to comply with any portion of this Consent Order shall constitute a separate and sufficient basis for administrative action, up to and including monetary penalties.

**NOW THEREFORE**, the Commissioner of the New Hampshire Banking Department enters the following ORDER:

1. The sanctions set forth above are hereby entered;
2. Pursuant to RSA 399-G:24,VI, the Commissioner finds this action necessary or appropriate to the public interest or the protection of consumers and consistent with the purposes fairly intended by the policy and provisions of this title;
3. This Order fully resolves this matter and the Commissioner will not take further action against Respondents for the allegations presented herein, provided that the

Department may take enforcement action against Respondents for any violation of this Consent Order or the matters underlying its entry, if the Commissioner determines that compliance with the terms of this Order are not being observed or if any representation made by Respondents and reflected herein is subsequently discovered to be untrue;

4. Nothing herein is intended to alter any future statutory or regulatory requirements of licensure and the allegations set forth above may be fully taken into account by the Department in connection with future examinations and enforcement actions; and
5. This Consent Order shall become final when issued.

Recommended by:

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/s/  
Maryam Torben Desfosses  
Hearings Examiner  
New Hampshire Banking Department

\_\_\_\_\_  
05/16/16  
Date

\_\_\_\_\_  
/s/  
Felix Suwandy, on his own behalf  
and on behalf of Kiki Indotransfer

\_\_\_\_\_  
06/06/16  
Date

\_\_\_\_\_  
/s/  
Fella Stevani, on her own behalf  
and on behalf of Kiki Indotransfer

\_\_\_\_\_  
05/25/16  
Date

**SO ORDERED.**

\_\_\_\_\_  
/s/  
Ingrid E. White  
Deputy Commissioner  
New Hampshire Banking Department

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06/16/16  
Date