

**STATE OF NEW HAMPSHIRE
BANKING DEPARTMENT**

In The Matter of: TTT Moneycorp, Ltd.

Case No. 18-028

CONSENT ORDER

The State of New Hampshire Banking Department (“Department”), acting in agreement with the respondent, TTT Moneycorp, Ltd. (“TTTML”), finds and orders as follows:

Jurisdiction

Pursuant to RSA 399-G:2, I, the New Hampshire Banking Department (“Department”) is charged with regulating persons that “act as a money transmitter while physically located in New Hampshire, or with, to, or from persons located in New Hampshire.” 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 RSA 399-G.

Background

TTTML is a corporation registered in the United Kingdom with a principal office location in London, England. Pursuant to its authority under 399-G:13, I, the Department, through the Consumer Credit Division, conducted an investigation of TTTML and discovered that TTTML conducted unlicensed money transmitter activity.

The Department determined that TTTML conducted at least fifty-nine (59) unlicensed international money transmissions with New Hampshire entities or consumers from at least June 30, 2016 until 2018 in violation of RSA 399-G:2, I. TTTML collected revenue equaling \$12,000.00 for the transmissions. TTTML fully cooperated with the Department regarding its unlicensed activity.

Acknowledgments

WHEREAS, TTTML makes the following acknowledgements:

1. TTTML voluntarily enters into and signs this Consent Order without reliance upon any discussions between the Department and TTTML, 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.
2. TTTML neither admits nor denies the allegations set forth herein, but understands that they constitute grounds for potential sanctions, as provided by law.
3. TTTML acknowledges, understands, and agrees that it has the right to notice and an adjudicatory hearing to contest the matters set forth herein, including any appeal, and hereby waives those rights. TTTML further acknowledges it waives the filing of any civil actions related to this matter.
4. TTTML understands that its action in entering this Consent Order is a final act and not subject to reconsideration or judicial review or appeal.
5. TTTML represents and warrants that it has all the necessary rights, powers and abilities to carry out the terms of this Consent Order.
6. TTTML acknowledges that the Department is relying upon TTTML's representations and warranties stated herein in making its determinations in this matter.
7. TTTML acknowledges that this Consent Order may be revoked and the Department may pursue any and all remedies available under the law against TTTML if the Department later learns that TTTML knowingly or willfully withheld information from the Department.
8. This Consent Order is binding on all heirs, assigns and successors in interest.

Order

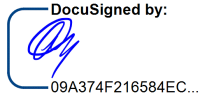
Pursuant to RSA 399-G:24, VI, the Bank Commissioner (“Commissioner”) finds this action necessary or appropriate to the public interest or the protection of consumers and consistent with the purposes fairly intended by the policy and provisions of RSA Chapter 399-G. Accordingly, the Commissioner orders as follows:

1. TTTML shall cease and desist from conducting any and all money transmitter activity with New Hampshire consumers or businesses until such time as it becomes licensed by the Department.
2. TTTML shall remit an administrative fine in the amount of \$50,000. The payment shall be made contemporaneously with TTTML’s execution of this Consent Order, by bank check made payable to the “State of New Hampshire.”
3. Failure by TTTML to comply with any portion of this Consent Order shall constitute a separate and sufficient basis for administrative action, up to and including license revocation and monetary penalties.
4. This Order fully resolves this matter and the Commissioner will not take further action against TTTML for the allegations presented herein. However, the Department may take enforcement action against TTTML 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 TTTML and reflected herein is subsequently discovered to be untrue.
5. This Consent Order shall become final when executed by the Commissioner.

Recommended by:

Maryam
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Digitally signed
by Maryam
Torben
Date: 2021.08.09
13:13:32 -04'00'

Maryam Torben
Hearings Examiner
New Hampshire Banking Department



Lee McDarby
Director
TTT Moneycorp.

SO ORDERED.

Gerald H. Little
Bank Commissioner
New Hampshire Banking Department

Date

11 August 2021

Date

Date