

**STATE OF NEW HAMPSHIRE
BANKING DEPARTMENT**

In The Matter of: Keefe Commissary Network, L.L.C. d/b/a Access Corrections

Case No. 20-115

CONSENT ORDER

The State of New Hampshire Banking Department (“Department”), acting in agreement with the respondent, Keefe Commissary Network, L.L.C. (d/b/a Access Corrections) (“Keefe Commissary”), 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

Keefe Commissary is a corporation registered in Missouri with a principal office location in Saint Louis, Missouri and has at least four (4) unregistered kiosk locations in New Hampshire correctional facilities without an authorized delegate registration. Keefe Commissary had a previous consent order with the Department for unlicensed money transmission. Pursuant to its authority under 399-G:13, I, the Department, through the Consumer Credit Division, conducted an examination of Keefe Commissary and discovered the following:

The Department determined that Keefe Commissary conducted money transmission activity in four correctional facilities from 2016 to 2020 without registering the kiosks in such

locations as authorized delegate locations. Keefe Commissary cooperated with the Department regarding its activity, which is in violation of RSA 399-G:2, I. In July of 2020, Keefe Commissary registered the kiosk locations as authorized delegates.

Acknowledgments

WHEREAS, Keefe Commissary makes the following acknowledgements:

1. Keefe Commissary voluntarily enters into and signs this Consent Order without reliance upon any discussions between the Department and Keefe Commissary, 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. Keefe Commissary understands the nature of the allegations set forth herein and that they constitute grounds for potential sanctions, as provided by law.
3. Keefe Commissary 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. Keefe Commissary further acknowledges it waives the filing of any civil actions related to this matter.
4. Keefe Commissary understands that its action in entering this Consent Order is a final act and not subject to reconsideration or judicial review or appeal.
5. Keefe Commissary represents and warrants that it has all the necessary rights, powers and abilities to carry out the terms of this Consent Order.
6. Keefe Commissary acknowledges that the Department is relying upon Keefe Commissary's representations and warranties stated herein in making its determination in this matter.
7. Keefe Commissary acknowledges that this Consent Order may be revoked and the

Department may pursue any and all remedies available under the law against Keefe Commissary if the Department later learns that Keefe Commissary 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 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. Keefe Commissary shall cease and desist from any future unlicensed money transmitter activity and from having any unregistered kiosks without an authorized delegate registration.
2. Keefe Commissary shall remit an administrative fine in the amount of \$24,400.00, which shall be made contemporaneously with Keefe Commissary’s execution of this Consent Order, by bank check made payable to the “State of New Hampshire.”
3. Failure by Keefe Commissary to comply with any portion of this Consent Order shall constitute a separate and sufficient basis for administrative action, up to and including license denial, license revocation, and monetary penalties.
4. This Consent Order fully resolves this matter and the Commissioner will not take further action against Keefe Commissary for the allegations presented herein. However, the Department may take enforcement action against Keefe Commissary for any violation of this Consent Order or the matters underlying its entry, if the Commissioner determines that compliance with the terms of this Consent Order are

not being observed or if any representation made by Keefe Commissary and reflected herein is subsequently discovered to be untrue.

5. This Consent Order shall become final when executed by the Commissioner.

Recommended by:

Maryam Torben Digitally signed by Maryam Torben
Date: 2020.07.31 12:38:12 -04'00'

Maryam Torben
Hearings Examiner
New Hampshire Banking Department

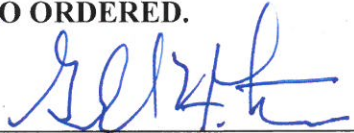
_____ Date

Christopher Alberta Digitally signed by Christopher Alberta
DN: cn=Christopher Alberta, o, ou, email=calberta@tkcholdings.com, c=US
Date: 2020.08.05 10:25:06 -04'00'

Christopher Charles Alberta
Chief Executive Officer
Keefe Commissary
d/b/a Access Corrections

_____ Date


SO ORDERED.



Emelia A.S. Galdieri
Deputy Commissioner
On Behalf Of Gerald H. Little, Bank Commissioner
New Hampshire Banking Department

8/12/2020

Date


Gerald H. Little
Bank Commissioner
New Hampshire Banking Department