

**STATE OF NEW HAMPSHIRE
BANKING DEPARTMENT**

In The Matter of: Global Client Solutions, LLC
Case No. 11-178

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, Global Client Solutions, LLC (“Global Client”) is an Oklahoma limited liability company that seeks to obtain a money transmission license from the Department pursuant to RSA 399-G.

WHEREAS, Global Client’s New Hampshire Money Transmitter license application approval is currently pending with the Department.

WHEREAS, pursuant to its authority under RSA 399-G: 5, IV, and RSA 399-G:13, the Department, through the Consumer Credit Division, conducted a review of Global Client’s application.

WHEREAS,

1. Global Client processed dedicated accounts for New Hampshire consumers from 2009. During this period, Global Client did not have a New Hampshire Money Transmitter license;
2. Global Client entered into contracts with New Hampshire consumers, who were also contracted with debt settlement companies to negotiate settlements on their behalf.

Global Client administered the dedicated accounts of consumers whose funds were used for their debt settlement programs.

3. Global Client collected at least \$690,084.85 in fees.
4. Global Client fully cooperated with the Department and there has been no admission or finding of liability.

WHEREAS, Global Client makes the following acknowledgements:

1. Global Client voluntarily enters into and signs this Consent Order without reliance upon any discussions between the Department and Global Client, 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. Global Client 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. Global Client further acknowledges it waives the filing of any civil actions related to this Consent Order.
3. Global Client understands that its action in entering this Consent Order is a final act and not subject to reconsideration or judicial review or appeal.
4. The conduct described above, if proven, would constitute violations of state law, which could result in penalties pursuant to RSA 399-G:21, IV.
5. Global Client understands the nature of the allegations set forth herein and that they constitute grounds for potential sanctions, as provided by law.
6. Global Client represents and warrants that it has all the necessary rights, powers and abilities to carry out the terms of this Consent Order.
7. Global Client acknowledges that the Department is relying upon Global Client's

representations and warranties stated herein in making its determinations in this matter.

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

WHEREAS, Global Client consents to the Department imposing the following sanctions:

1. Global Client shall become licensed by the Department as a Money Transmitter.
2. Global Client shall remit a penalty in the amount of \$75,000 by bank check to the “State of New Hampshire.” Such payment shall be made within forty-five (45) days of the execution of this Consent Order, which is upon the Commissioner’s signature.
3. Failure by Global Client 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:20,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 Global Client for the allegations presented herein, provided that the

