

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

4 **Facts**

- 5 5. From August 18, 2006 to June 8, 2011, Cambridge had conducted money
6 transmitter activity for New Hampshire consumers without a valid Money
7 Transmitter license issued by the Department.
- 8 6. Cambridge realized a net profit of \$8,322.88 for the unlicensed
9 activity.
- 10 7. Cambridge has cooperated and provided the information to show it did
11 conduct business in New Hampshire prior to obtaining a Money
12 Transmitter License from the Department.

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

- 14 8. Cambridge is a "Person" as defined by RSA 399-G:1,X.
- 15 9. Cambridge may be assessed an administrative fine not to exceed
16 \$2,500.00 for each violation of RSA Chapter 399-G. RSA 399-G:21,IV and
17 V.

18 **Respondent's Consent**

- 19 10. Cambridge does not deny the facts, statements, or violations contained
20 herein and Cambridge hereby agrees to the entry of this Consent Order.
- 21 11. Cambridge has voluntarily entered into this Consent Order without
22 reliance upon any discussions between the Department and Cambridge,
23 without promise of a benefit of any kind (other than concessions
24 contained in this Consent Order), and without threats, force,
25 intimidation, or coercion of any kind. Cambridge further acknowledges

1 its understanding of the nature of the allegations set forth in this
2 action, including the potential penalties provided by law.

3 12. Cambridge hereby acknowledges, understands, and agrees that there is
4 the right to notice, hearing, and/or a civil action and hereby waives
5 said rights.

6 **Order**

7 13. **Whereas pursuant to RSA 399-G:20,VI** finding this Consent Order
8 necessary, appropriate and in the public interest and consistent with
9 the intent and purposes of New Hampshire banking laws, the Department
10 Orders as follows:

11 a. Cambridge shall pay to the Department \$8,322.88 in
12 administrative penalties for unlicensed activity payable
13 contemporaneously with Cambridge's signing of this Consent
14 Order. The check shall be bank check or guaranteed funds and
15 made payable to "State of New Hampshire".

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

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

22 16. This Consent Order shall become effective upon the date the
23 Commissioner signs this Consent Order.

24 17. Once this Consent Order is effective, the Department agrees not to
25 seek further reimbursement, refunds, penalties, fines, costs, or fees

1 regarding the facts, allegations, or findings of violations contained
2 herein.

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

5
6 Recommended this 18th day of October, 2011 by

7 _____
/s/

8 Maryam Torben Desfosses, Hearings Examiner, Banking Department

9
10 Executed this 26th day of October, 2011 by

11 _____
/s/

12 Bernard Jones Heitner, Chief Executive Officer and Indirect Owner of
13 Cambridge Mercantile Corp. (U.S.A.)

14
15 **SO ORDERED.**

16
17 _____
/s/
18 Ronald A. Wilbur
Bank Commissioner

Dated: 11/10/2011