

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
OFFICE OF FINANCIAL AND INSURANCE REGULATION

Before the Commissioner of the Office of Financial and Insurance Regulation

In the matter of:

Keefe Commissary Network, L.L.C.
License No. MT-0017082

Enforcement Case No. 12-11599

Respondent.

Issued and entered
this 18th day of January 2015
by Stephen R. Hilker
Senior Deputy Commissioner

ORDER FOR COMPLIANCE AND PAYMENT OF FINE

A. FINDINGS OF FACT AND CONCLUSIONS OF LAW

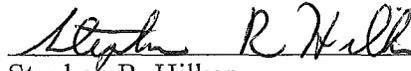
1. Keefe Commissary Network, L.L.C. (Respondent), a money transmission service business licensed in Michigan since May 14, 2010, is located at 10880 Linpage Place, Saint Louis, Missouri 63132.
2. Respondent knew or had reason to know that Section 11(1) of the Money Transmission Services Act (Act), MCL 487.1011(1), states:

(1) Except as otherwise provided in this section and subject to section 4, a person shall not provide money transmission services in this state after December 31, 2006 without a license under this act or a class I license issued under the consumer financial services act, 1988 PA 161, MCL 487.2051 to 487.2072.
3. On August 1, 2011, the Office of Finance and Insurance Regulation (OFIR) performed an examination of Respondent pursuant to Section 21 of the Act, MCL 487.1021.
4. Through the examination process, it was determined that Respondent had been transacting money transmission services business for a period of 2 years prior to obtaining a license.
5. By transacting money transmission services business for 2 years prior to obtaining a money transmission license in the state of Michigan, Respondent violated Section 11(1) of the Act, MCL 487.1011(1).

B. ORDER

Based upon the findings of fact and conclusions of law above, and Respondent's Stipulation, it is hereby **ORDERED** that:

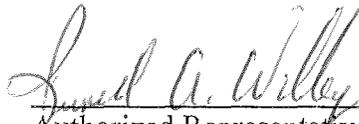
1. Respondent shall pay to the State of Michigan, a civil fine of Twenty One Thousand and Five Hundred Dollars (\$21,500.00). Respondent shall pay the fine by the due date printed on the OFIR Invoice.



Stephen R. Hilker
Senior Deputy Commissioner

C. STIPULATION

I have read and understand the Order above. I agree that the Senior Deputy Commissioner has jurisdiction and authority to issue this Order pursuant to the Money Transmission Services Act. I waive any right to a hearing in this matter if this Order is issued. I understand that this Order and Stipulation will be presented to the Senior Deputy Commissioner for approval and the Senior Deputy Commissioner may or may not issue this Order. I waive any objection to the Commissioner deciding this case following a hearing in the event the Order is not approved. I admit the findings of fact and conclusions of law set forth in the above Order, for the purposes of this Order, and I agree to the entry of this Order. I admit that both parties have complied with the procedural requirements of the Money Transmission Services Act and the Michigan Administrative Procedures Act, MCL 24.201 *et seq.* I have had an opportunity to review the Stipulation and Order and have the same reviewed by legal counsel.



Authorized Representative of
Keefe Commissary Network, L.L.C.
MT - 0017082

Name/Title: Russell A. Willey/200 Monroe

Dated: 12/20/12

OFIR Staff approve this Stipulation and recommend that the Commissioner issue the above Order.



Scott Basel (P68335)
Attorney

Dated: 1-7-13