

**STATE OF MICHIGAN
DEPARTMENT OF ENERGY, LABOR AND ECONOMIC GROWTH
OFFICE OF FINANCIAL AND INSURANCE REGULATION**

Before the Commissioner of the Office of Financial & Insurance Regulation

In the Matter of:

Central Clearing Co. /Cash Now, Partners, Limited Partnership
21421 Hilltop Street, Suite 7
Southfield, MI 48033

And

Enforcement Case No. 09-7378

Money Service Centers, LLC
21421 Hilltop Street, Suite 7
Southfield, MI 48033

Respondents

CONSENT ORDER

**Issued and entered
on 3/12/10
by **Stephen R. Hillker,**
Chief Deputy Commissioner**

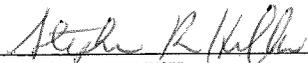
Based upon the Stipulation to Entry of Consent Order and the files and records of the Office of Financial and Insurance Regulation (OFIR) in this matter, the Chief Deputy Commissioner Finds and concludes that:

1. The Chief Deputy Commissioner has jurisdiction and authority to adopt and issue this Consent Order in this proceeding pursuant to the Michigan Administrative Procedures Act of 1969 ("MAPA"), as amended, MCL 24.201 *et seq.*, and the Money Transmission Services Act, 2006 PA 250, 487.1001 *et seq.* ("Act").
2. All required notices have been issued in this case, and the notices and service thereof were appropriate and lawful in all respects.
3. All applicable provisions of the MAPA have been met. Acceptance of the parties' Stipulation to Entry of Consent Order is reasonable and in the public interest.
4. Respondents inadvertently violated the Money Transmission Services Act by providing money transmission services as defined by the Act without a license.

5. Respondents have explained the circumstances which lead to the violation of the Act.

Now therefore, based upon the parties' Stipulation to Entry of Consent Order and the facts surrounding this case, **IT IS ORDERED THAT:**

6. Respondents shall pay to the State of Michigan, through OFIR, civil fines in the amount of \$3,750.00 and also pay investigative costs and expenses in the total amount of \$3,750.00.
7. The Chief Deputy Commissioner retains jurisdiction over the matters contained herein and has the authority to issue such further order(s) as he shall deem just, necessary and appropriate in accordance with the Act. Failure to abide by the terms and provisions of the Stipulation and this Order may result in the commencement of additional proceedings.



Stephen R. Hilker
Chief Deputy Commissioner

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STIPULATION TO ENTRY OF CONSENT ORDER

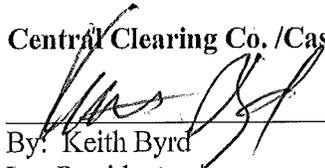
Respondent Central Clearing Co./Cash Now, Partners, Limited Partnership (CCCN) and Respondent Money Service Centers, LLC (MSC) (Respondents) and the Office of Financial and Insurance Regulation ("OFIR") stipulate to the following:

1. Respondents are affiliated companies both doing business as "Cash Connection." Respondents in good faith sought to determine the applicability of the Money Transmission Services Act, 2006 PA 250, 487.1001 et seq ("Act.") to an arrangement in which it would assist an FDIC insured, national bank that issued the cards in marketing stored value cards.
2. Respondents relied in good faith on advice supplied to them by counsel from [REDACTED] which Respondents were advised was based in part upon concurring statements of OFIR staff members. Respondents were advised that the Act did not apply where an FDIC insured bank issued stored value cards and marketed those cards with the assistance of agents. OFIR maintains that it did not at any time advise [REDACTED] concerning the applicability of the Act to Respondents or any other entity that engages in the issuance, marketing or distribution of stored value cards. OFIR also conducted a search of its records and did not locate any written correspondence from OFIR to [REDACTED] advising it as to the applicability of the Act to Respondents or any other entity concerning the issuance, marketing, or distribution of stored value cards.

3. In good faith reliance upon their understanding of the scope of the Act, MSC in May of 2009 began assisting ██████████ in marketing stored value cards. In reliance upon the advice it had received MSC did not file an application for a license under the Act. In July of 2009, CCCN, allegedly wishing to begin issuing money orders, filed an application for a license under the Act. CCCN further alleges that, through error, the application indicated that CCCN would be marketing cards but did not reference the issuance of money orders in its application for a license under the Act.
4. During the course of OFIR's review of CCCN's application for a license under the Act, OFIR Staff requested information regarding Cash Connection's prepaid master cards. In response CCCN provided information regarding stored value cards that had been marketed by MSC. On January 6, 2010 OFIR Staff concluded that CCCN had violated the Act by issuing or selling "The Cash Connection Prepaid MasterCard" without a license under the Act.
5. In response to the communication of January 6, 2010, Respondents submitted additional information including: (a) the advice that they had received from counsel; (b) the statements that were attributed to OFIR Staff by counsel; (c) CCCN had filed its application for a license under the Act to issue money orders; and (d) the fact that the stored value cards were issued by a national bank and marketed through MSC, and not CCCN.
6. Respondents contend that a license is not required under the Act to assist a national bank in marketing stored value cards and hence a license under the Act was not required and that it did not violate the Act.
7. It is OFIR's position that a money transmitter provider license is required to offer the "Cash Connection Prepaid MasterCard" to consumers.
8. OFIR and Respondents have conferred for purposes of resolving this matter and have agreed that it is in the parties' best interest to resolve this matter pursuant to the terms set forth below.
9. Respondents have agreed to pay OFIR civil fines in the amount of \$3,750.00 and pursuant to MCL 487.1046 to also pay investigative costs and expenses in the total amount of \$3,750.00 as provided for in the attached Consent Order.
10. All parties have complied with the procedural requirements of the MAPA and the Act. Respondents understand and agree that this Stipulation will be presented to the Chief Deputy Commissioner for approval. Respondents, without admitting the truth or validity of any of the allegations made by OFIR, agree that they shall operate their business in the State of Michigan at all times so that they shall not engage in any violations of sections of the Act and consent to the entry of the Consent Order.

11. The Chief Deputy Commissioner has jurisdiction and authority under the provisions of the MAPA and the Act to accept the Stipulation and Consent Order and to issue a Consent Order resolving these proceedings. Respondents have had an opportunity to review the Stipulation and Consent Order and have the same reviewed by legal counsel.
12. Respondents understand that the Chief Deputy Commissioner may in his sole discretion, decide to accept or reject the Stipulation and Consent Order. If the Chief Deputy Commissioner accepts the Stipulation and Consent Order, Respondents waive the right to a hearing in this matter and consent to the entry of the Consent Order. If the Chief Deputy Commissioner does not accept the Stipulation and Consent Order, Respondents waive any objection to the Commissioner holding a formal administrative hearing and making his decision after such hearing.
13. The failure to abide by the terms and conditions of this Stipulation and Consent Order may, at the discretion of the Chief Deputy Commissioner, result in further administrative compliance actions.

Central Clearing Co. /Cash Now, Partners, Limited Partnership


By: Keith Byrd
Its: President

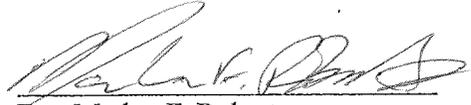
3/5/10
Dated

Money Service Centers, LLC


By: Keith Byrd
Its: President

3/5/10
Dated

Office of Financial & Insurance Regulation


By: Marlon F. Roberts
Staff Attorney

3/10/10
Dated