

COMMONWEALTH OF MASSACHUSETTS

Suffolk, SS.

COMMISSIONER OF BANKS

FOREIGN TRANSMITTAL
AGENCY LICENSING

Docket No. 2019-001

In the Matter of)
HODAN GLOBAL MONEY)
SERVICES, INC.)
Minneapolis, Minnesota)
Foreign Transmittal Agency License No: FT947779)
_____)
_____)

CONSENT ORDER

WHEREAS, HODAN GLOBAL MONEY SERVICES, INC., Minneapolis, Minnesota (Hodan or the Corporation), a licensed foreign transmittal agency under Massachusetts General Laws chapter 169 has been advised of its right to Notice and Hearing pursuant to General Laws chapter 169, section 13, and having waived those rights, entered into a STIPULATION AND CONSENT TO THE ISSUANCE OF A CONSENT ORDER (Consent Agreement) with representatives of the Division of Banks (Division) dated October 15, 2019, whereby, solely for the purpose of settling this matter, and without admitting any allegations or implications of fact or the existence of any violation of state or federal laws and regulations governing the conduct and operation of a foreign transmittal agency, Hodan agrees to the issuance of this CONSENT ORDER (Order) by the Commissioner of Banks (Commissioner);

WHEREAS, on January 26, 2015, the Commissioner and Hodan entered into a STIPULATION AND CONSENT TO THE ISSUANCE OF A CONSENT ORDER, Docket No, 2014-015 (2015 Consent Order) for the purpose of settling the matters raised during a 2013 Examination of Hodan.

WHEREAS, an examination of Hodan was conducted pursuant to General Laws chapter 169, section 10, as of September 13, 2016 (the examination) to assess the Corporation's level of compliance with applicable state and federal laws, rules, regulations and regulations governing the conduct of those engaged in the business of a foreign transmittal agency in the Commonwealth;

WHEREAS, the Report of Examination (the Report) issued pursuant to the Division's 2016 examination of Hodan alleged substantial non-compliance with applicable state and federal statutes, rules, and regulations governing the conduct of those engaged in the business of foreign transmittal agency in the Commonwealth.

WHEREAS, the parties now seek to resolve by mutual agreement, the matters identified in the Report.

WHEREAS, by mutual agreement of the Corporation and the Division, the 2015 Consent Order is hereby superseded and replaced by this Order.

ORDER

NOW COME the parties in the above-captioned matter, the Division and Hodan, and stipulate and agree as follows

1. Hodan shall deposit all customer funds received for transmittal to a foreign country in one or more client funds accounts maintained at a federally insured bank or credit union in accordance with the Division's regulation 209 CMR 45.13(1).

2. Hodan must obtain a surety bond that is in addition to the bond required by M.G.L. c. 169, section 2, in an amount equal to twice the weekly average amount of transactions, for a total of at least four weeks of coverage. Hodan will continuously maintain the increased bond coverage while this Order is in effect, or until such time the Commissioner may modify this Section of the

Order. The Corporation will review remittance activity and the additional bond coverage on a regular basis to ensure at least four weeks bond coverage is maintained going forward.

3. Hodan must immediately notify the Division in the event of the termination and/or cancellation of its client funds account maintained with a federally insured bank or credit union.

4. Hodan must immediately register Taaj Services as a tradename in Massachusetts via the Nationwide Multistate Licensing System (NMLS) & Registry or cease using the name. Hodan must list Taaj Services as an “other trade name” on its NMLS record.

5. Hodan must address all matters requiring attention set forth in the Report within the timeframes contained therein. Hodan must also adopt and implement any corrective actions discussed in the Report that are not specifically addressed by the provisions of this Order.

6. Hodan must furnish written progress reports to the Division, via secure email to dobprogressreport@mass.gov, by the thirtieth day after the end of each calendar month following the effective date of this Order. Progress reports will detail, the form, content, and manner of any action taken to address each section of this Order, and will consist at a minimum, of the following:

- (a) Provide all Reports of International Transportation of Currency or Monetary Instruments (CMIRs) filed.
- (b) Each progress report submitted to the Division pursuant to this section of the Order will be reviewed and signed by a duly authorized senior officer of Hodan.

7. The provisions of this Order shall not limit, estop, or otherwise prevent the Division, or any other state or federal agency or department, from taking any other action affecting Hodan, its successors or assigns.

8. Nothing in this Order will be construed as permitting Hodan to violate any law, rule, regulation, or regulatory bulletin to which the Corporation is subject.

9. This Order will become effective immediately upon the date of its issuance.

10. The provisions of this Order are binding upon Hodan, its owners, officers and directors, and their successors and assigns.

11. In accordance with the terms of the Consent Agreement entered by Hodan and the Commissioner, Hodan has waived all rights of appeal that it may have relative to this Consent Order or any of its provisions.

12. The provisions of this Consent Order shall remain effective and enforceable except to the extent that, and until such time as, any provisions of this Consent Order shall have been modified, terminated, suspended, or set aside by the Commissioner or upon an order of a court of competent jurisdiction.

13. This Order and the Consent Agreement are the complete documents representing the resolution of this matter. There are no other agreements between the Division and Hodan.

BY ORDER AND DIRECTION OF THE COMMISSIONER OF BANKS:

Dated at Boston, Massachusetts, this 15th day of October, 2019.

By: Mary L. Gallagher
Commissioner of Banks
Commonwealth of Massachusetts