

1 b. Failed to ensure that its authorized delegates prominently displayed their money
2 transmitter authorized delegate license in their principal places of business;
3 specifically:

4 (1) The money transmitter authorized delegate license was not prominently
5 displayed in at least twenty-one (21) of Respondent's authorized delegate
6 locations;

7 c. Failed to include in its contracts with its authorized delegates an appendix that
8 contains a current copy of A.R.S. Title 6, Chapter 12, specifically:

9 (1) The agreement between GDC and authorized delegate Walgreens, provided to
10 the Department's Examiners during the exam, was incomplete as the contract
11 only makes reference to an abbreviated version of A.R.S. Title 6, Chapter 12;

12 (2) Respondent was informed that an abbreviated copy fails to satisfy the
13 requirements of A.R.S. § 6-1208(B); and

14 (3) Respondent made reference to another copy that should have been included
15 with the contract to satisfy A.R.S. § 6-1208(B), however the document
16 appeared to be added after the Examiners brought the matter to management's
17 attention, based on the page numbers cited in the original contract; and

18 d. Failed to update its policies and procedures to include the changes to Arizona
19 transmitters of money statutes passed into law in 2002, and failed to include a
20 record of instruction that promotes compliance with A.R.S. Title 6, Chapter 12 and
21 Title 13, Chapter 23.

22 4. These Findings of Fact shall also serve as Conclusions of Law.

23 ...

24 LAW

25 1. Pursuant to A.R.S. § 6-1201, *et seq*, the Superintendent has the authority and duty to
26

1 regulate all persons engaged in the money transmitter business and with the enforcement of
2 statutes, rules, and regulations relating to money transmitters.

3 2. By the conduct, set forth above, Respondent violated the following:

4 a. A.R.S. § 6-1202(B) by failing to timely submit its 2011 Annual Report to the
5 Arizona Corporation Commission, due on November 19, 2011;

6 b. A.R.S. § 6-1207(C) by failing to ensure that its authorized delegates prominently
7 displayed their money transmitter authorized delegate license in their principal
8 places of business;

9 c. A.R.S. § 6-1208(B) by failing to include in its contracts with its authorized
10 delegates an appendix that contains a current copy of A.R.S. Title 6, Chapter 12.

11 3. For the purposes of this Order only, GDC does not meet any of the exemptions to the
12 licensing requirements set forth in A.R.S. § 6-1203.

13 4. The violations, set forth above, constitute grounds for: (1) the issuance of an order
14 pursuant to A.R.S. § 6-137 directing Respondent to cease and desist from the violative conduct and
15 to take the appropriate affirmative actions, within a reasonable period of time prescribed by the
16 Superintendent, to correct the conditions resulting from the unlawful acts, practices, and
17 transactions; (2) the imposition of a civil monetary penalty pursuant to A.R.S. § 6-132; (3) the
18 suspension or revocation of Respondent's license pursuant to A.R.S. § 6-1210; and (4) an order or
19 any other remedy necessary or proper for the enforcement of statutes and rules regulating money
20 transmitters pursuant to A.R.S. §§ 6-123 and 6-131.

21 **ORDER**

22 1. GDC shall immediately stop the violations set forth in the Findings of Fact and
23 Conclusions of Law. GDC:

24 a. Shall ensure procedures are in place to timely submit all future Annual Reports to
25 the Arizona Corporation Commission;

1 of Fact, Conclusions of Law, and Order in the above-referenced matter, has read the same, is
2 aware of its right to an administrative hearing in this matter, and has waived the same.

3 2. Respondent admits the jurisdiction of the Superintendent and consents to the entry of
4 the foregoing Findings of Fact, Conclusions of Law, and Order.

5 3. Respondent states that no promise of any kind or nature has been made to induce it to
6 consent to the entry of this Order, and that it has done so voluntarily.

7 4. Respondent agrees to immediately cease from engaging in the violative conduct set
8 forth in the Findings of Fact and Conclusions of Law.

9 5. Respondent acknowledges that the acceptance of this Agreement by the Superintendent
10 is solely to settle this matter and does not preclude this Department, any other agency or officer of
11 this state or subdivision thereof from instituting other proceedings as may be appropriate now or in
12 the future.

13 6. Steven W. Streit, on behalf of Green Dot Corporation, represents that he is the
14 President and CEO and that, as such, has been authorized by Green Dot Corporation to consent to
15 the entry of this Order on its behalf.

16 7. Respondent waives all rights to seek judicial review or otherwise to challenge or
17 contest the validity of this Order.

18 DATED this 5 day of September, 2012.

19 By: 

20 Steven W. Streit, President and CEO
21 Green Dot Corporation

22 ORIGINAL of the foregoing filed this 13th
23 day of September, 2012, in the office of:

24 Lauren W. Kingry
25 Superintendent of Financial Institutions
26 Arizona Department of Financial Institutions
ATTN: Sabrina Zimmerman
2910 N. 44th Street, Suite 310
Phoenix, AZ 85018

1 COPY mailed/delivered same date to:

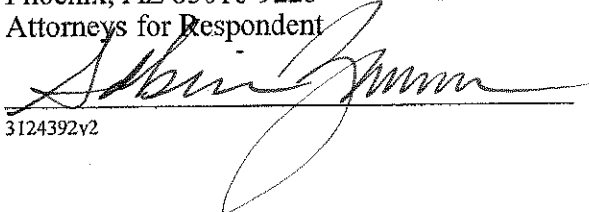
2 Craig A. Raby, Assistant Attorney General
3 Office of the Attorney General
4 1275 West Washington
5 Phoenix, AZ 85007

6 Robert D. Charlton, Assistant Superintendent
7 Mark Murphy, Senior Examiner
8 Arizona Department of Financial Institutions
9 2910 N. 44th Street, Suite 310
10 Phoenix, AZ 85018

11 AND COPY MAILED SAME DATE by
12 Certified Mail, Return Receipt Requested, to:

13 Green Dot Corporation
14 c/o Steve Streit, President and CEO
15 605 E. Huntington Drive, Suite 205
16 Monrovia, CA 91016
17 Respondent

18 Paul K. Charlton, Esq.
19 GALLAGHER & KENNEDY, P.A.
20 2575 East Camelback Road
21 Phoenix, AZ 85016-9225
22 Attorneys for Respondent

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