

1 a. Although Petitioner held two bonds totaling \$500,000 for its dba RIA
2 and its other dba Associated Foreign Exchange, Petitioner failed to
3 maintain a required bond of \$365,000 for RIA as of the date the
4 number of its authorized delegate locations in Arizona exceeded two
5 hundred and one (201), specifically:

6 (1) Petitioner held a bond of \$250,000 for RIA at the time of
7 examination;

8 (2) Petitioner has obtained and currently holds a bond of
9 \$500,000 for RIA;

10 b. Failed to ensure that one of its authorized delegates prominently
11 displayed their money transmitter authorized delegate license in their
12 principal place of business;

13 c. The copy of A.R.S. Title 6, Chapter 12 included in Petitioner's
14 contracts with its authorized agents did not include a reference to an
15 Arizona statutory obligation to file a copy of certain reports
16 ("Reports") with the Arizona Attorney General, as the obligation to
17 file such Reports with the Attorney General had been negated by a
18 2009 Regulatory Alert issued in Arizona; and

19 d. Petitioner's authorized delegates committed violations of law by
20 failing to keep sufficiently specific customer occupation information
21 for certain transactions involving the transmission of money, whether
22 sending or receiving, in an amount of one thousand dollars
23 (\$1,000.00) or more, as required by A.R.S. § 6-1241(E), specifically:

24 (1) Failed to record the customers' occupation with specificity
25 beyond, for example "construction" or "motorist," for six (6)
26 transactions involving the receiving of \$1,000 or more.

ORDER

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2 1. While not admitting liability for any of the above, RIA shall immediately
3 stop the asserted violations set forth in the Findings of Fact and Conclusions of Law. RIA:

- 4 a. Shall maintain a required bond of \$365,000 based on the number of
5 authorized delegate locations in Arizona;
- 6 b. Shall require its authorized delegates to prominently display their
7 money transmitter authorized delegate licenses in their principal
8 places of business;
- 9 c. Shall include in its contracts with its authorized delegates an
10 appendix that contains a current copy of A.R.S. Title 6, Chapter 12
11 that includes the statutory requirement to file a copy of the Reports
12 with the Arizona Attorney General, as well as a copy of the 2009
13 Regulatory Alert that negates the obligation to file copies of such
14 Reports with the Arizona Attorney General ; and
- 15 d. Shall require that its authorized delegates keep sufficiently specific
16 occupational records for each transaction involving the transmission
17 of money, whether sending or receiving, in an amount of one
18 thousand dollars (\$1,000.00) or more.

19 2. RIA shall immediately pay to the Department an assessment in the amount
20 of **seventeen thousand five hundred dollars (\$17,500.00)**.

21 3. RIA shall comply with all Arizona statutes and rules regulating Arizona
22 money transmitters (A.R.S. § 6-1201, et seq.).

23 4. The provisions of this Order shall be binding upon RIA, its employees,
24 agents, and other persons participating in the conduct of the affairs of Petitioner.

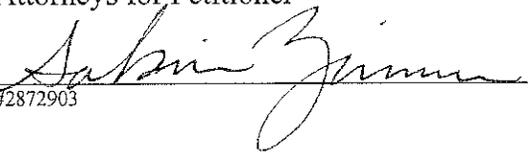
1 Robert D. Charlton, Assistant Superintendent
2 Mark Murphy, Senior Examiner
3 Arizona Department of Financial Institutions
4 2910 N. 44th Street, Suite 310
5 Phoenix, AZ 85018

6 AND COPY MAILED SAME DATE by
7 Certified Mail, Return Receipt Requested, to:

8 Juan C. Bianchi, President and CEO
9 Continental Exchange Solutions, Inc. #1
10 dba RIA Financial Services
11 c/o Juan C. Bianchi, President and CEO
12 6565 Knott Avenue
13 Buena Park, CA 90620-1139
14 Petitioner

15 William E. Waugh
16 Chief Compliance Officer
17 VP-Regulatory Affairs
18 Continental Exchange Solutions, Inc. #1
19 dba RIA Financial Services
20 6565 Knott Avenue
21 Buena Park, CA 90620-1139

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