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**STATE OF CALIFORNIA**  
**BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY**  
**DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION**

TO: Convict Cash  
755 E. Washington Blvd.  
Pasadena, CA 91104  
www.convictcash.com  
<https://www.onlinecommissionarylosangelescountyjail.com>

**CEASE AND DESIST ORDER**  
**(For violations of Financial Code section 2030)**

The Commissioner of Financial Protection and Innovation (“Commissioner”) finds that:

1. At all relevant times, Convict Cash is or was a business of unknown form with an address of 755 E. Washington Blvd., Pasadena, California 91104. Convict Cash operated and maintained internet websites located at [www.convictcash.com](http://www.convictcash.com) and <https://www.onlinecommissionarylosangelescountyjail.com>.
2. The Commissioner has jurisdiction over the licensing and regulation of persons and entities engaged in the business of money transmission in California under the Money Transmission Act (Fin. Code, § 2000 *et seq.*).
3. The Money Transmission Act provides, “A person shall not engage in the business of money transmission in this state, or advertise, solicit, or hold itself out as providing money transmission in this state, unless the person is licensed or exempt from licensure . . . or is an agent of a person licensed or exempted from licensure.” (Fin. Code, § 2030, subd. (a); see Cal. Code Regs., title 10, § 80.125.10.)
4. An “agent” of a licensee is a “person that is not itself licensed as a money transmitter in California and provides money transmission in California on behalf of the licensee, provided that the licensee becomes liable for the money transmission from the time money or monetary value is received by that person.” (Fin. Code, § 2003, subd. (b); see Cal. Code Regs., title 10, § 80.126.)

1           5.       “Money transmission” includes “[r]eceiving money for transmission.” (Fin. Code, §  
2 2003, subd. (q).) “Receiving money for transmission,” as defined by Financial Code section 2003,  
3 subdivision (u), means actually or constructively receiving money “within or outside the United  
4 States by electronic or other means.” (See Cal. Code Regs., title 10, § 80.129.)

5           6.       Convict Cash advertised on its websites that it provides the public with “money  
6 transfer services” such as online commissary, inmate commissary deposits, and sends money to  
7 inmates housed in the Los Angeles County Jail. Convict Cash asks potential customers to provide  
8 the following information online: (a) the amount of money to send to the online commissary, (b) the  
9 inmate’s name, and (c) the inmate’s booking number. Through Convict Cash’s online commissary,  
10 customers can send up to \$130 per week to an inmate by paying a small fee, and inmates are  
11 guaranteed to receive their funds in their commissary accounts within 72 hours. For an elevated fee,  
12 Convict Cash can send a customer’s funds to an inmate within one day.

13           7.       On or around March 24, 2020, Convict Cash unlawfully advertised, solicited, and  
14 represented to at least one California resident that it is “an online service that you deposit money to  
15 and then we transfer the money to the facility [jail] where the individual is housed at.” The Convict  
16 Cash representative informed the California resident that the company was licensed in California.

17           8.       Convict Cash has not been issued a license by the Commissioner under the Money  
18 Transmission Act and is not authorized to engage in business as a money transmitter in California.  
19 Convict Cash is not exempt from the licensing requirement of Financial Code section 2030,  
20 subdivision (a).

21           9.       Financial Code section 567 provides, “[i]f the commissioner finds that a person has  
22 conducted, or that there is reasonable cause to believe that a person is about to conduct, business that  
23 requires a license issued by the commissioner and that person has not been issued the required  
24 license, the commissioner may, without any prior notice or hearing, order the person to cease and  
25 desist from conducting any unauthorized business unless and until the person is issued a license to  
26 engage in appropriate license business.”

27           Based on the foregoing findings, the Commissioner is of the opinion that Convict Cash has  
28 engaged in the business of money transmission in California and advertised, solicited, or held itself

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out as providing money transmission in California without first obtaining a license or being an agent of a person licensed or exempted from licensure in violation of Financial Code section 2030, subdivision (a).

Accordingly, pursuant to Financial Code section 567, Convict Cash is hereby ordered to cease and desist from engaging in the business of money transmission in California, advertising, soliciting or holding itself out as providing money transmission in California, unless and until it obtains a license from the Commissioner or is an agent of a person licensed or exempt from licensure.

This Order is necessary, in the public interest, for the protection of consumers and consistent with the purposes, policies and provisions of the Money Transmission Act. This Order shall remain in full force and effect further order of the Commissioner.

Dated: August 19, 2022

CLOTHILDE V. HEWLETT  
Commissioner of Financial Protection and Innovation



By: \_\_\_\_\_  
MARY ANN SMITH  
Deputy Commissioner  
Enforcement Division