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9 Attorneys for Complainant

10  
11 BEFORE THE DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION  
OF THE STATE OF CALIFORNIA

12  
13 In the Matter of:

14 THE COMMISSIONER OF FINANCIAL  
15 PROTECTION AND INNOVATION,

16 Complainant,

17 v.

18 NOBEL FINANCIAL INC.,

19 Respondent.

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)  
) LIS No.: 2617  
)  
) NMLS ID: 1313855  
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)  
) FINDINGS AND ORDER ACCEPTING  
) VOLUNTARY SURRENDER OF LICENSE  
) NUMBER 2617  
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25 To: Nobel Financial Inc.  
26 999 Riverview Drive, Suite 201 – Room 224  
27 Totowa, New Jersey 07512

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1           1.       The Commissioner has jurisdiction to license and regulate persons and entities engaged  
2 in the business of money transmission in California pursuant to the Money Transmission Act (MTA)  
3 (Fin. Code § 2000 et seq.). The Commissioner is authorized to administer and enforce the MTA and  
4 the rules issued under title 10 of the California Code of Regulations (Cal. Code Regs.) that regulate  
5 the business and activities of money transmitters. Unless the context otherwise requires, the definitions  
6 set forth in or incorporated into Division 1.2 of the Financial Code apply throughout the Order.

7           2.       Nobel Financial Inc. (Nobel or Respondent) has its principal place of business located  
8 at 999 Riverview Drive, Suite 201 – Room 224, Totowa, New Jersey 07512. On or around October 8,  
9 2018, the Commissioner issued California money transmitter license number 2617 to Respondent  
10 pursuant to Financial Code section 2031 and Cal. Code Regs., tit. 10, section 80.167. Respondent's  
11 Nationwide Multistate Licensing System and Registry (NMLS) identification number is 1313855.  
12 Respondent obtained a license from the Commissioner to engage in the business of money  
13 transmission.

14           3.       Richard Louis Mahfouz (Mahfouz), NMLS identification number 1332788, is a control  
15 person and president of Respondent.

16           4.       Scott Kenneth McClain (McClain), NMLS identification number 2252076, is a control  
17 person and chief compliance officer of Respondent.

18           5.       Thomas Christian Knobel (Knobel), NMLS identification number 1393254, is a control  
19 person of Respondent.

20           6.       On or around April 29, 2022, Respondent filed on NMLS its California money services  
21 business (MSB) call report for the first quarter (2022 Q1 MSB Call Report). The 2022 Q1 MSB Call  
22 Report showed that Respondent did not conduct any money transmission in California.

23           7.       On or around August 2, 2022, Respondent filed on NMLS its California MSB call  
24 report for the second quarter (2022 Q2 MSB Call Report). The 2022 Q2 MSB Call Report showed  
25 that Respondent did not conduct any money transmission in California.

26           8.       On or around November 11, 2022, Respondent filed on NMLS its California MSB call  
27 report for the third quarter (2022 Q3 MSB Call Report). The 2022 Q3 MSB Call Report showed that  
28 Respondent did not conduct any money transmission in California.

1           9.       On or around February 8, 2023, Respondent filed on NMLS its California MSB call  
2 report for the fourth quarter (2022 Q4 MSB Call Report). The 2022 Q4 MSB Call Report showed that  
3 Respondent did not conduct any money transmission in California.

4           10.      On or around July 6, 2023, the Commissioner issued a Notice of Intention and  
5 Accusation in Support of Order Revoking California Money Transmitter License Pursuant to Financial  
6 Code Section 590 (Accusation) against Respondent, after finding that Respondent had not conducted  
7 any money transmission in California.

8           11.      On or around July 10, 2023, Respondent was personally served with the Notice of  
9 Intention and Accusation. On July 18, 2023, Respondent requested a one-week extension to file its  
10 Notice of Defense with the Commissioner. On July 24, 2023, the Commissioner granted  
11 Respondent's request for a one-week extension to file its Notice of Defense. On August 1, 2023,  
12 Respondent timely filed its Notice of Defense with the Commissioner. The Office of Administrative  
13 Hearings (OAH) set the one-day administrative hearing for November 28, 2023.

14           12.      On September 13, 2023, Respondent filed a request to surrender its license to engage  
15 in the business of money transmission in California. On October 13, 2023, the Parties signed a  
16 Settlement Agreement and filed a request to take the administrative hearing off OAH's calendar.

17           13.      On October 26, 2023, the Commissioner received Respondent's original license.

18           14.      On October 27, 2023, Respondent filed a report with the Commissioner showing its  
19 obligations to escheat any outstanding California money transmission liability.

20           15.      On November 14, 2023, Respondent filed its final financial statements which included  
21 the balance sheets, income statement of cash flows, schedules of eligible securities, and California  
22 Average Daily Transmission Liability (ADTL) Statements showing that all transmission liability has  
23 been delivered to the beneficiary, refunded to the California consumer, or escheated to the State  
24 Controller's Office to the Money Transmitter Division.

25           16.      On November 14, 2023, Respondent filed a certified report showing its obligations to  
26 escheat any outstanding California money transmission liability.

27           17.      Respondent shall continue to be subject to California Financial Code section 453 and  
28 to the following sections of the California Financial Code, including any regulations and orders

1 currently in effect or that are hereafter issued from time to time by the Commissioner with respect to  
2 those provisions of the MTA, in the same manner and to the same extent as if Respondent continued  
3 to be licensed: Sections 2038, 2081, 2120, 2124, and 2148.

4 THEREFORE, GOOD CAUSE APPEARING, the voluntary surrender of California money  
5 transmitter license number 2617 from Nobel Financial Inc. pursuant to Financial Code section 2170  
6 is accepted. This order is effective immediately.

7 Dated: November 22, 2023

CLOTHILDE V. HEWLETT  
Commissioner of Financial Protection and Innovation



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9  
10 By \_\_\_\_\_  
11 MARY ANN SMITH  
12 Deputy Commissioner  
13 Enforcement Division  
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