

STATE OF NEW JERSEY  
DEPARTMENT OF BANKING AND INSURANCE

IN THE MATTER OF:

GB CHECK CASHING LLC,	)	CONSENT ORDER
Reference No. 9941061;	)	
	)	
Branch Office at 1520 Roosevelt Avenue,	)	
Unit 1508, Carteret, New Jersey 07008,	)	
Reference No. 0758540;	)	
	)	
Branch Office at 3029 Route 130 South,	)	
Delran, New Jersey 08075,	)	
Reference No. 1000016;	)	
	)	
Talvinder S. Ghuman,	)	
REC Reference No. 0785575	)	

TO: GB CHECK CASHING LLC  
5420 Route 38 East  
Pennsauken, New Jersey 08109

TALVINDER S. GHUMAN  
53 Oakhurst Lane  
Mount Laurel, New Jersey 08054

THIS MATTER having been opened by the Commissioner of the New Jersey Department of Banking and Insurance ("Commissioner"), upon information that GB Check Cashing, LLC ("GB Check Cashing") may have violated various provisions of the New Jersey Check Cashers Regulatory Act of 1993, N.J.S.A. 17:15A-30 to -52 ("the Act"); and

WHEREAS, at all times relevant to this matter, GB Check Cashing was and is currently licensed under the Act as a check casher in the State of New Jersey; and

WHEREAS, GB Check Cashing's primary licensed office is located at 5420 Route 38 East, Pennsauken, New Jersey 08109 (Reference No. 9941061), and has licensed branch offices located at 1520 Roosevelt Avenue, Unit 1508, Carteret, New Jersey 07008 (Reference No. 0758540), and 3029 Route 130 South, Delran, New Jersey 08075 (Reference No. 1000016) (collectively "GB Check Cashing Licensed Locations"); and

WHEREAS, at all times relevant to this matter, Dalwinder S. Ghuman and Talvinder S. Ghuman have been, and are, the sole members and principals of GB Check Cashing; and

WHEREAS, pursuant to N.J.S.A. 17:15A-44(n), a licensee shall supervise employees engaged in the operation of the check cashing business to ensure the business is conducted lawfully and pursuant to the provisions of the Act and any order, rule or regulation made or issued pursuant to the Act; and

WHEREAS, pursuant to N.J.S.A. 17:15A-48(a)(1), the Commissioner may revoke or suspend a license under the Act if, after notice and hearing, the Commissioner determines that the licensee has violated any provision of the Act or any order, rule, or regulation made or issued pursuant to the Act or has violated any other law in connection with the operation of the check cashing business; and

WHEREAS, pursuant to N.J.S.A. 17:15A-48(a)(4), the Commissioner may revoke or suspend a license under the Act if, after notice and hearing, the Commissioner determines that the licensee has been convicted of an offense involving breach of trust, moral turpitude or fraudulent or dishonest dealing, or has a final judgment entered against him in a civil action upon grounds of fraud, misrepresentation or deceit; and

WHEREAS, pursuant to N.J.S.A. 17:15A-48(a)(7), the Commissioner may revoke or suspend a license under the Act if, after notice and hearing, the Commissioner determines that

the licensee has demonstrated unworthiness, incompetence, bad faith or dishonesty in transacting business or otherwise; and

WHEREAS, pursuant to N.J.S.A. 17:15A-48(a)(8), the Commissioner may revoke or suspend a license under the Act if, after notice and hearing, the Commissioner determines that the licensee has engaged in any other conduct which would be deemed by the Commissioner to be grounds to deny, revoke or suspend a license; and

WHEREAS, pursuant to N.J.S.A. 17:15A-48(c), for the purposes of N.J.S.A. 17:15A-48, a conviction exists if the person has been convicted under the laws of this State, the United States or another state for an offense that is substantially similar to the offenses enumerated in N.J.S.A. 17:15A-48; and

WHEREAS, financial institution reporting provisions of the Bank Secrecy Act ("BSA") set forth at 31 U.S.C. § 5313 and 31 U.S.C. § 5331 and their implementing regulations require that financial institutions file Currency Transaction Reports of each deposit, withdrawal, exchange of currency or other payment or transfer, by, through, or to such financial institution that involve a transaction in currency of more than \$10,000; and

WHEREAS, 31 U.S.C. § 5324(a)(1) prohibits structuring transactions to evade the reporting requirements of 31 U.S.C. § 5313 and 31 U.S.C.A § 5331; and

WHEREAS, 31 U.S.C. § 5324(d)(2) enhances the criminal penalties for violations of 31 U.S.C. § 5324 in aggravated cases that are part of a pattern of any illegal activity involving more than \$100,000 in a 12-month period; and

WHEREAS, on November 30, 2012, GB Check Cashing executed a Plea Agreement with the United States Attorney for the District of New Jersey ("U.S. Attorney"), providing that the

U.S. Attorney would accept a guilty plea from GB Check Cashing to a one-count information charging GB Check Cashing with a violation of 31 U.S.C. §§ 5313, 5324(a), and 5324(d)(2);

WHEREAS, the Plea Agreement also provided that, upon entry of a guilty plea to the information and sentencing thereon, the U.S. Attorney (1) will not initiate any further criminal or civil or forfeiture charges against GB Check Cashing or against Dalwinder S. Ghuman or Talvinder S. Ghuman relating to GB Check Cashing's failure to file Currency Transaction Reports during the period from on or about September 20, 2010 through on or about June 14, 2011; (2) at sentencing, will move for the dismissal of a previously filed criminal complaint in United States v. Dalwinder S. Ghuman and Talvinder S. Ghuman, said matter having been placed under seal by court order on September 16, 2011; (3) at sentencing, will move for dismissal of a previously filed related forfeiture matter, captioned In re the Seizure of 18 Money Orders Valued At Approximately \$11,700 et al.; and (4) at sentencing, return to GB Check Cashing any monies in the possession of the U.S. Attorney's Office that exceed the sum of approximately \$1,086,894.33, said amount having been seized on or about September 16, 2011 and said sum to be forfeited to the United States by GB Check Cashing; and

WHEREAS, that the Plea Agreement was agreed to and signed by Dalwinder S. Ghuman and Talvinder S. Ghuman, in the presence of their respective attorneys, on November 30, 2012, as the sole members of GB Check Cashing; and

WHEREAS, on July 11, 2013, the U.S. Attorney accepted and entered into the Plea Agreement; and

WHEREAS, on July 11, 2013, a one-count information was filed in the United States District Court for the District of New Jersey against GB Check Cashing by the U.S. Attorney under Criminal Docket No. 13-457; and

WHEREAS, the Information charged GB Check Cashing with knowingly failing to file Currency Transaction Reports, in violation of 31 U.S.C. § 5313(a) and 5324(a), and the regulations promulgated thereunder, from on or about September 20, 2010 through on or about June 14, 2011, in Camden, Mercer, and Middlesex Counties, in the District of New Jersey and elsewhere; and

WHEREAS, the Information further charged that GB Check Cashing's failure to file the said Currency Transaction Reports was part of a pattern of illegal activity involving more than \$100,000 in a 12-month period, subjecting GB Check Cashing to enhanced penalties under 31 U.S.C. § 5324(d)(2); and

WHEREAS, the Information also sought forfeiture to the United States by GB Check Cashing of a sum of money equal to at least \$1,086,894.33 in United States currency, upon conviction of the charges in the Information; and

WHEREAS, on July 11, 2013, GB Check Cashing pleaded guilty to the one count of the Information; and

WHEREAS, on July 11, 2013, the Plea Agreement was read into the record, and the court ordered the Plea Agreement approved and accepted GB Check Cashing's guilty plea; and

WHEREAS, on July 11, 2013, pursuant to GB Check Cashing's guilty plea, the court sentenced GB Check Cashing to one year's probation (non-reporting) and a special assessment of \$400; and

WHEREAS, on July 11, 2013, pursuant to the Plea Agreement, the court entered a Consent Judgment and Preliminary Order of Forfeiture, signed by the U.S. Attorney and by GB Check Cashing, granting possession to the United States of approximately \$1,086,894.33 in United States currency seized from GB Check Cashing on September 16, 2011; and

WHEREAS, the Consent Judgment and Preliminary Order of Forfeiture also provided that the United States would not pursue forfeiture on other items of currency also seized in that matter, specifically, 18 money orders valued at approximately \$11,700 and a total of approximately \$699,693 in United States currency; and

WHEREAS, the guilty plea and acceptance, sentencing, and forfeiture were memorialized in a Judgment of Conviction signed by the court on July 12, 2013; and

WHEREAS, on November 19, 2013, the court entered a Final Order of Forfeiture against the \$1,086,894.33; and

WHEREAS, GB Check Cashing's July 12, 2013 conviction for failure to file Currency Transaction Reports and structuring transactions to evade reporting requirements as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period is a violation of a licensee's responsibility to supervise employees engaged in the operation of the check cashing business to ensure the business is conducted lawfully, in violation of N.J.S.A. 17:15A-44(n), -48(a)(1), and -48(e); and

WHEREAS, GB Check Cashing's July 12, 2013 conviction for failure to file Currency Transaction Reports and structuring transactions to evade reporting requirements as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period is a violation of laws in connection with the operation of the check cashing business, in violation of N.J.S.A. 17:15A-48(u)(1) and -48(e); and

WHEREAS, GB Check Cashing's July 12, 2013 conviction for failure to file Currency Transaction Reports and structuring transactions to evade reporting requirements as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period is an offense

involving breach of trust, moral turpitude or fraudulent or dishonest dealing, in violation of N.J.S.A. 17:15A-48(a)(4) and -48(c); and

WHEREAS, GB Check Cashing's July 12, 2013 conviction for failure to file Currency Transaction Reports and structuring transactions to evade reporting requirements as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period, demonstrates GB Check Cashing's unworthiness, incompetence, bad faith or dishonesty in transacting business or otherwise, in violation of N.J.S.A. 17:15A-48(a)(7) and -48(c); and

WHEREAS, GB Check Cashing's July 12, 2013 conviction for failure to file Currency Transaction Reports and structuring transactions to evade reporting requirements as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period is conduct deemed by the Commissioner to be grounds to deny, revoke, or suspend a license of N.J.S.A. 17:15A-48(a)(8) and -48(e); and

WHEREAS, the November 19, 2013 Final Order of Forfeiture against \$1,086,894.33 seized from GB Check Cashing on September 16, 2011, demonstrates GB Check Cashing's unworthiness, incompetence, bad faith or dishonesty in transacting business or otherwise, in violation of N.J.S.A. 17:15A-48(a)(7); and

WHEREAS, the November 19, 2013 Final Order of Forfeiture against \$1,086,894.33 seized from GB Check Cashing on September 16, 2011, is conduct deemed by the Commissioner to be grounds to deny, revoke, or suspend a license of N.J.S.A. 17:15A-48(a)(8); and

WHEREAS, GB Check Cashing agrees to take responsibility for the aforementioned violations of the Act; and

WHEREAS, GB Check Cashing has waived its right to a hearing on this matter; and

WHEREAS, this matter should be resolved, upon the consent of all parties; and

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THIS MATTER having been opened by the New Jersey Real Estate Commission (the "Commission") in the Department of Banking and Insurance, State of New Jersey, upon information that Talvinder S. Ghuman, a previously licensed real estate salesperson, may have violated various provisions of the New Jersey Real Estate Licensing Law, N.J.S.A. 45:15-1 to -29; and

WHEREAS, Talvinder S. Ghuman, one of the members and principals of GB Check Cashing, was licensed as a real estate salesperson in New Jersey until his license expired on June 30, 2019; and

WHEREAS, pursuant to N.J.S.A. 45:15-17(e), a real estate salesperson shall not engage in any conduct which demonstrates unworthiness, incompetency, bad faith or dishonesty; and

WHEREAS, GB Check Cashing's July 12, 2013 conviction and the November 19, 2013 Final Order of Forfeiture, is conduct deemed by the Commission to be grounds to deny, revoke, or suspend Talvinder S. Ghuman's salesperson license under N.J.S.A. 45:15-17(e); and

WHEREAS, Talvinder S. Ghuman agrees to take responsibility for the aforementioned violation of the Act; and

WHEREAS, Talvinder S. Ghuman has waived its right to a hearing on this matter; and

WHEREAS, this matter should be resolved, upon the consent of all parties; and

NOW, THEREFORE, IT IS on this 20<sup>th</sup> day of December 2019,

ORDERED that the check casher license of GB Check Cashing LLC, Reference Nos. 9941061, 0758540, 1000016, is revoked, pursuant to N.J.S.A. 17:15A-48; and

IT IS FURTHER ORDERED AND AGREED that simultaneously with execution of this Consent Order by GB Check Cashing LLC, it shall pay a civil penalty to the Commissioner in



the amount of \$30,000.00 for the violations admitted to herein by certified check, official bank check, or money order made payable to the "Commissioner, State of New Jersey," which shall be sent to the counsel for the Commissioner; and

IT IS FURTHER ORDERED AND AGREED that Tulvinder S. Ghuman shall not apply to the Real Estate Commission to renew or reinstate his expired real estate salesperson license, Reference No. 0785575; and

IT IS FURTHER ORDERED AND AGREED that the terms of the Consent Order relating to Tulvinder S. Ghuman's real estate salesperson license were approved by the Real Estate Commission at a regular meeting on February 11, 2020 and *OK*

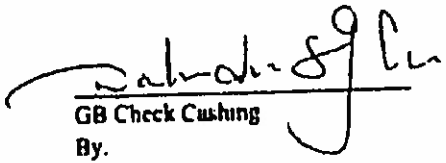
IT IS FURTHER ORDERED AND AGREED that the provisions of this Consent Order represent a final agency decision and constitute final resolution of the violations contained herein.

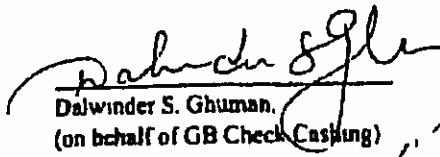
*McAride*

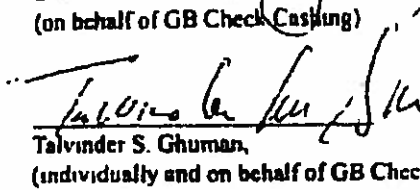
Marlene Caride  
Commissioner

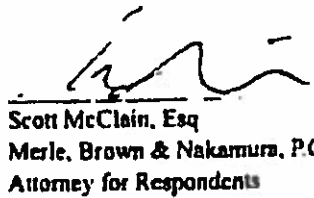
*12/20/19 The portions of the  
Order related to the Real  
Estate Commission shall become  
effective upon approval by  
the Real Estate Commission.  
McAride*

**CONSENTED TO AS TO FORM, CONTENT AND ENTRY:**

  
GB Check Cashing  
By. Date: 12/19/19

  
Dalwinder S. Ghuman,  
(on behalf of GB Check Cashing) Date: 12/19/19

  
Dalwinder S. Ghuman,  
(individually and on behalf of GB Check Cashing) Date: 12/19/2019

  
Scott McClain, Esq  
Merle, Brown & Nakamura, P.C.  
Attorney for Respondents Date: 12/19/19

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY  
Attorney for the New Jersey  
Department of Banking and Insurance

  
By: Garen Gazaryan  
Deputy Attorney General Date: 12/19/2019