

IN THE 6th CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE
FOR THE TWENTIETH JUDICIAL DISTRICT AT NASHVILLE

FILED

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RICHARD B. ROOPER, CLERK

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STATE OF TENNESSEE, *ex rel.*)
HERBERT H. SLATERY III,)
Attorney General and Reporter,)
)
Petitioner,)
)
)
)
v.)
)
MONEYGRAM PAYMENT)
SYSTEMS, INC.,)
)
Respondent.)
)

No. 16C585

PETITION

The State of Tennessee, by and through Herbert H. Slatery III, the Attorney General and Reporter, (“Attorney General”), at the request of Bill Giannini, Acting Director of the Division of Consumer Affairs of the Department of Commerce and Insurance (“Division”) (collectively “the State of Tennessee”), files this Petition pursuant to Tenn. Code Ann. § 47-18-107 of the Tennessee Consumer Protection Act (“Consumer Act”).

1. The Attorney General, acting pursuant to the Consumer Act, has investigated certain acts and practices of Respondent MoneyGram Payment Systems, Inc. The Attorney General has determined that certain of Respondent’s acts and practices engaged in between 2007 and 2009, more specifically described in Paragraph 2 of this Petition, may constitute unfair and deceptive acts or practices affecting the conduct of trade or commerce in the State of Tennessee in

violation of Tenn. Code Ann. § 47-18-104.

2. Based upon the investigation of Respondent, upon information and belief, the State of Tennessee alleges the following:

A. Between 2007 and 2009, perpetrators of unfair or deceptive act and practices utilized fraud or deception to induce Tennessee consumers to send money to recipients in other locations using services offered by MoneyGram.

B. At the time that those fraud induced money transfers occurred, MoneyGram failed to maintain a comprehensive anti-fraud compliance program sufficient to prevent its money transfer system from being used to perpetuate fraud induced money transfers.

3. Respondent believes that it has fully and voluntarily cooperated with the Attorneys General in their investigation. Although Respondent denies any liability based upon the allegations above, in order to resolve this dispute, Respondent has agreed to the terms of the attached Assurance of Voluntary Compliance (“Assurance”).

4. The Attorney General negotiated an Assurance in accordance with the provisions set forth in Tenn. Code Ann. § 47-18-107.

5. The parties have agreed to, and the Division has approved, the Assurance filed contemporaneously herewith.

6. In accordance with the provisions of Tenn. Code Ann. § 47-18-107(c), the execution, delivery, and filing of the Assurance does not constitute an admission of prior violation of the Consumer Act.

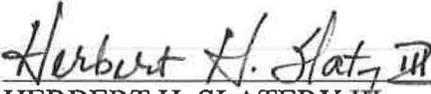
7. The State of Tennessee and Respondent have jointly agreed to the Assurance and the Agreed Final Order and join in their filing.

PREMISES CONSIDERED, the State of Tennessee prays that:

1. This Petition be filed without cost bond pursuant to the provisions of Tenn. Code Ann. §§ 20-13-101 and 47-18-116; and

2. The Assurance be approved and filed in accordance with the provisions of the Consumer Act.

RESPECTFULLY SUBMITTED,


HERBERT H. SLATTERY III
Attorney General and Reporter
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