

STATE OF ALASKA  
DEPARTMENT OF COMMERCE, COMMUNITY, AND ECONOMIC DEVELOPMENT  
DIVISION OF BANKING AND SECURITIES

IN THE MATTER OF:

Kronos SaaShr, Inc.  
AK-MT-014537  
NMLS #1698726

Respondent.

**ORDER NO. 21-117-C**

**CONSENT ORDER**

The Department of Commerce, Community, and Economic Development, Division of Banking and Securities (“Department”), has conducted an investigation into the business activities of Kronos SaaShr, Inc. (“Respondent”) and has determined that Respondent violated certain provisions of Alaska Statute (“AS”) 06.55 *et seq* (“Alaska Uniform Money Services Act”).

Respondent agrees that the Department has jurisdiction over Respondent and these matters pursuant to the Alaska Uniform Money Services Act.

Respondent wishes to resolve and settle this matter with the Department. As evidenced by the authorized signature on this Order, Respondent consents to the entry of this Order to assess civil penalties based on the Conclusions of Law and Order Respondent waives its right to a hearing.

**I. FINDINGS OF FACT**

1. Respondent is a corporation formed under the laws of the state of Delaware, and maintains a principal place of business at 3040 Route 22 West, Branchburg, NJ 08876.

2. Respondent is a provider of workforce management, human capital management, and payroll solutions. Through Respondent’s principal product, “UKG Ready,”

1 organizational customers are able to electronically pay their employees and direct payments  
2 to other recipients (*e.g.*, local, state, and federal tax agencies or designated recipients of child  
3 support or wage garnishment payments). All such payments are made pursuant to instructions  
4 provided by Respondent’s customers. Respondent initiates transfers of funds through the  
5 Automated Clearing House (“ACH”) network from the customer’s designated bank account  
6 to the Respondent’s bank accounts, then from the Respondent’s bank accounts to the bank  
7 accounts of the recipients specified by the customer. If necessary, Respondent distributes  
8 paper checks to the employees on behalf of the customer. With respect to certain tax  
9 payments, Respondent transfers the amount of funds necessary to pay required taxes from the  
10 customers’ bank accounts to a tax account controlled by Respondent. Respondent holds such  
11 funds in its account and pays the taxes when they are due. Respondent charges monthly fees  
12 to its customers based on a “per employee” rate and any additional service fees.

13 3. On April 13, 2021, Respondent applied for a money transmission license in Alaska  
14 on its own initiative.

15 4. On June 4, 2021, Respondent submitted an Alaska Money Services Business  
16 Affidavit (“Affidavit”) through the Nationwide Multistate Licensing System & Registry,  
17 which is the system of record for non-depository financial services licensing or registration in  
18 participating state agencies. Respondent reported in its Affidavit that it conducted money  
19 transmission in Alaska without a license.

20 5. Upon request by the Department, Respondent provided a log of transaction activity  
21 in Alaska from August 2018 until June 2021.

22 6. Respondent has cooperated with the Department in its investigation into this matter.  
23 The Department acknowledges that (i) Respondent demonstrated good faith in submitting an  
24

1 application to become licensed as a money transmitter, and (ii) the Department has never  
2 received a complaint regarding the Respondent's business.

3 **II. CONCLUSIONS OF LAW**

4 1. From October 2020 until June 2021, Respondent engaged in "money transmission"  
5 in Alaska as defined in AS 06.55.990(15) by receiving money or monetary value for  
6 transmission.

7 2. From 2020 to 2021, Respondent violated AS 06.55.101(a) by engaging in money  
8 transmission in Alaska without a money transmission license.

9 3. Pursuant to AS 06.55.605, Respondent is subject to a civil penalty because it  
10 violated AS 06.55.101(a). The Department may assess a civil penalty against a person who  
11 violates AS 06.55.010(a) in an amount not to exceed \$1,000 each day for each day the violation  
12 is outstanding.

13 4. Pursuant to AS 06.55.407(b), this Order is a public document, as the Department  
14 has determined that the release of information is reasonably necessary for the protection of  
15 the public and in the interests of justice.

16 **III. ORDER**

17 Pursuant to the Alaska Uniform Money Services Act and on the basis of the Findings of  
18 Fact, Conclusions of Law, and Respondent's consent to the entry of this Order, it is hereby  
19 ORDERED:

20 1. Respondent shall pay a civil penalty under AS 06.55.605 in the amount of \$10,000,  
21 plus \$500 to reimburse the Department for the costs of its investigation, for a total amount of  
22 \$10,500. This amount was calculated at \$5,000 for each year Respondent engaged in  
23 unlicensed activity.

24 2. Respondent shall comply with all provisions of the Alaska Uniform Money Services

1 Act and associated regulations. This Order shall not be construed as an admission by  
2 Respondent and shall be the sole enforcement action or other recourse for the Respondent's  
3 prior activity related to its payroll processing services in Alaska prior to June 16, 2021.

4 3. This Order is a publicly disclosable document and is reportable to the NMLS.

5 **IT IS SO ORDERED.**

6  
7 JULIE SANDE, Commissioner  
8 Department of Commerce, Community and  
9 Economic Development

10 DATED: 12/23/22

/s/ Robert H. Schmidt

11 BY: Robert H. Schmidt, Director  
12 Division of Banking and Securities  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

1 **Consent to Entry of Order**

2 Elizabeth McCarron, President, as authorized representative of Kronos Saashr, Inc.  
3 (“Respondent ”), acknowledges that she has read the foregoing Order and that she knows and  
4 fully understands the Order contents; that Respondent voluntarily and without any force or  
5 duress, consents to the entry of this Order, expressly waiving its right to a hearing in this  
6 matter; that Respondent understands that the Department reserves the right to take further  
7 actions to enforce this Order or to take appropriate action upon discovery of other violations  
8 of the Alaska Uniform Money Services Act, and that Respondent will fully comply with the  
9 terms and conditions stated herein.

10 Respondent further assures the Department that Respondent and its officers,  
11 employees and agents will only effect money transmissions in Alaska in full compliance with  
12 the terms of this Order and the Alaska Uniform Money Services Act.

13 Respondent acknowledges that this Order is a publicly disclosable document.

14 12/21/2022 /s/ Elizabeth McCarron  
15 Date Elizabeth McCarron  
Vice President, Kronos Saashr, Inc.

16  
17 SUBSCRIBED AND SWORN TO before me this 21st day of December, 2022 at  
18 Lowell, MA.

19 /s/ Cynthia Trank  
20 Notary Public in and for MA  
Cynthia Trank  
21 Notary Printed Name  
22 My commission expires: 12/23/2027

23 Contact Person:  
Leif Haugen  
Financial Examiner 4  
24 (907) 269-8144

STATE OF ALASKA  
DEPARTMENT OF COMMERCE, COMMUNITY, AND ECONOMIC DEVELOPMENT  
DIVISION OF BANKING AND SECURITIES  
550 WEST SEVENTH AVENUE, SUITE 1850  
ANCHORAGE, ALASKA 99501  
(907)269-8140