

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF BANKING AND SECURITIES

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COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF BANKING AND  
SECURITIES, BUREAU OF BANK  
SUPERVISION

v.

TWILIGHTSAVING  
TRUSTUNIONCREDITS

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: Docket No. : 25\_0006\_\_(BNK-C&D)  
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**NOTICE OF RIGHT TO APPEAL AND HEARING**

You have the right to appeal the attached Order within **14 days** of the date of the Order as provided in 1 Pa. Code § 35.20. To appeal the Order, you must file a petition, in writing, with the Docket Clerk as set forth below. **If the Docket Clerk does not receive your petition within 14 days, you will waive your right to a hearing and the Order will be deemed final.**

The petition must be in writing, state clearly and concisely your grounds of interest in the subject matter, the facts you rely upon, the law you rely upon, and the relief you seek as required by 1 Pa. Code §35.17.

The petition and all other documents relating to this matter must be filed with the Docket Clerk:

Linnea Freeberg, Docket Clerk  
Department of Banking and Securities  
17 N. Second Street, Suite 1300  
Harrisburg, PA 17101  
[RA-BNDOCKETCLERK@pa.gov](mailto:RA-BNDOCKETCLERK@pa.gov)

Further, you must serve a copy of the petition on the person who signed the attached Order by providing a copy to their counsel set forth below:

Kurt Geishauser  
Assistant Counsel  
Department of Banking and Securities  
17 N. Second St., Ste. 1300  
Harrisburg, PA 17101  
[BN-CHIEFCOUNSEL@pa.gov](mailto:BN-CHIEFCOUNSEL@pa.gov)

Once you file your petition, you will be notified of pertinent information such as the name of the presiding officer designated by the Banking and Securities Commission to hear this matter and, if a hearing is scheduled, the date, time and location of the hearing. You have the right to be represented by an attorney.

All procedural matters will be governed by the Pennsylvania Administrative Agency Law, 2 Pa. C.S. §§501-508, 701-704, and the General Rules of Administrative Practice and Procedure, 1 Pa. Code §§31.1.-35.251.

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Docket No. : 25\_0006\_(BNK-C&D)

**CEASE AND DESIST ORDER**

**BACKGROUND**

1. The Department of Banking and Securities (“Department”) is the Commonwealth of Pennsylvania’s administrative agency authorized and empowered to administer and enforce the Banking Code of 1965, 7 P.S. § 101 *et seq.* (“Banking Code”).

2. The Bureau of Bank Supervision is primarily responsible for administering and enforcing the Banking Code for the Department.

3. Twilightsaving purportedly has an address at 50 West Chestnut Street, Lancaster, Pennsylvania 17603.

4. Trustunioncredits also purportedly has an address at 50 West Chestnut Street, Lancaster, Pennsylvania 17603.

5. The Banking Code states that “no person may lawfully engage in this Commonwealth in the business of receiving money for deposit or transmission, or lawfully establish in this Commonwealth a place of business for such purpose, except a bank, a bank and trust company, an interstate bank, a savings bank, a private bank, a savings association to the extent

provided in the Savings Association Code of 1967, a regional thrift institution to the extent provided in section 117 of this act or section 114 of the Savings Association Code of 1967 and a person duly authorized by Federal law to engage in the business of receiving money for deposit or transmission.” 7 P.S. §105(a).

6. The Banking Code provides that the name of an institution... “shall not contain any word which may deceptively lead to the conclusion that the institution is authorized to perform any act or conduct any business which it is not authorized to perform or conduct or which is forbidden to it by law, its articles or otherwise.” 7 P.S. §802(a)(viii).

### **TWILIGHT SAVING**

7. At all times material herein, Twilightsaving maintained a website (“Twilight Website”) at [twilightsaving.com](http://twilightsaving.com). The Twilight Website homepage states, “Welcome to Twilight Saving. Your number one online banking system with premium security for easy banking experience...login below to experience online banking at its peak.”

8. According to Twilight Website, Twilightsaving purports to offer a variety of services, including but not limited to: “Internet banking”, “Loan management of customers and account funding using secured payment gateways”, “Fixed Deposit...This is an investment account, where money deposited for a fixed period earns a higher interest rate than a savings account.”

9. According to Twilight Website, “Twilightsaving creates the easiest possible ways to transfer money...Enjoy the versatility of transferring funds to local and foreign banks with Twilightsaving fund transfer program built with a censure algorithm for money transfer.”

10. According to Twilight Website, Twilightsaving is purportedly in the business of receiving money for deposit or transmission. However, Twilightsaving is not a bank, a bank and

trust company, an interstate bank, a savings bank, a private bank, a savings association to the extent provided in the Savings Association Code of 1967, a regional thrift institution to the extent provided in section 117 of this act or section 114 of the Savings Association Code of 1967 and a person duly authorized by Federal law to engage in the business of receiving money for deposit or transmission. 7 P.S. §105(a).

11. Twilightsaving does not meet any of the exceptions set forth in 7 P.S. §105(b).

### **TRUST UNION CREDITS**

12. At all times material herein, Trustunioncredits maintained a website (“Trust Union Website) at [trustunioncredits.com](http://trustunioncredits.com). The Trust Union Website homepage states, “Welcome to Trust Union Credits. Your number one online banking system with premium security for easy banking experience...login below to experience online banking at its peak.”

13. According to Trust Union Website, Trustunioncredits purports to offer a variety of services, including but not limited to: “Internet banking”, “Loan management of customers and account funding using secured payment gateways”, “Fixed Deposit...This is an investment account, where money deposited for a fixed period earns a higher interest rate than a savings account.”

14. According to Trust Union Website, “Trustunioncredits creates the easiest possible ways to transfer money...Enjoy the versatility of transferring funds to local and foreign banks with Trustunioncredits fund transfer program built with a censure algorithm for money transfer.”

15. According to Trust Union Website, Trustunioncredits is purportedly in the business of receiving money for deposit or transmission. However, Trustunioncredits is not a bank, a bank and trust company, an interstate bank, a savings bank, a private bank, a savings association to the extent provided in the Savings Association Code of 1967, a regional thrift institution to the extent

provided in section 117 of this act or section 114 of the Savings Association Code of 1967 and a person duly authorized by Federal law to engage in the business of receiving money for deposit or transmission. 7 P.S. §105(a).

16. Trustunioncredits does not meet any of the exceptions set forth in 7 P.S. §105(b).

### **VIOLATIONS**

17. By engaging in the activity set forth in paragraph 3 and paragraphs 7 through 11 above, Twilightsaving is in violation of Section 105(a) of the Banking Code.

18. By engaging in the activity set forth in paragraph 3 and paragraphs 7 through 11 above, Twilightsaving is in violation of Section 802(a)(viii) of the Banking Code.

19. By engaging in the activity set forth in paragraph 4 and paragraphs 12 through 16 above, Trustunioncredits is in violation of Section 105(a) of the Banking Code.

20. By engaging in the activity set forth in paragraph 4 and paragraphs 12 through 16 above, Trustunioncredits is in violation of Section 802(a)(viii) of the Banking Code.

### **AUTHORITY OF THE DEPARTMENT**

21. 71 P.S. § 733-202 D. of the Department of Banking and Securities Code provides that, “The department may issue orders, statements of policy and interpretive letters necessary and appropriate to administer this act or any other statute within the department’s jurisdiction to administer or enforce.”

**AND NOW THEREFORE**, the Bureau of Bank Supervision, pursuant to its authority referenced above hereby imposes the following Order:

1. Twilightsaving shall cease and desist from violating Sections 105(a) and 802(a)(viii) of the Banking Code, 7 P.S. §§ 105(a) and 802(a)(viii) and otherwise comply with the requirements of the Banking Code of 1965, 7 P.S. § 101 *et seq.*.

2. Trustunioncredits shall cease and desist from violating Sections 105(a) and 802(a)(viii) of the Banking Code, 7 P.S. §§ 105(a) and 802(a)(viii) and otherwise comply with the requirements of the Banking Code of 1965, 7 P.S. § 101 *et seq.*.

3. Nothing in this Order shall prevent the Bureau of Bank Supervision from taking any further administrative action for any other reason as deemed necessary.

**IT IS SO ORDERED.**

Redacted

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Robert Lopez, Director  
Bureau of Bank Supervision  
Department of Banking and Securities



Date: February 25, 2025