
*
IN THE MATTER OF: *
*
COINME INC. *
d/b/a COINME *
NMLS # 1185542 *
*
(“Coinme”) *
*

CONSENT ORDER

WHEREAS, the Banking Commissioner (“Commissioner”) is charged with the administration of Part V of Chapter 668, Sections 36a-595 to 36a-614, inclusive, of the Connecticut General Statutes, known as the “Money Transmission Act”;

WHEREAS, Coinme is a Virginia corporation with an office at 255 S King St., Suite 800, Seattle, Washington;

WHEREAS, Coinme has been licensed to engage in the business of money transmission in Connecticut since April 14, 2021. On November 1, 2023, Coinme requested renewal of its license to engage in the business of money transmission in Connecticut on the Nationwide Multistate Licensing System and Registry (“NMLS”) for the January 1, 2024 through December 31, 2024 period. On November 14, 2024, Coinme requested renewal of its license to engage in the business of money transmission in Connecticut on NMLS for the January 1, 2025 through December 31, 2025 period. Such renewal requests are currently pending;

WHEREAS, pursuant to the authority granted by Sections 36a-17 and 36a-608(a) of the Connecticut General Statutes, the Commissioner, through the Consumer Credit Division of the Department of Banking, participated in a multistate examination in 2023, with a review period from

February 23, 2021, through March 31, 2023, to determine if Coinme had violated, was violating or was about to violate the provisions of the Connecticut General Statutes within the jurisdiction of the Commissioner (“Examination and Investigation”);

WHEREAS, as a result of such Examination and Investigation, on October 25, 2024, the Commissioner issued an Order of Summary Suspension, Temporary Order to Cease and Desist, Order to Make Restitution, Order to Provide Disgorgement, Notice of Intent to Revoke and Refuse to Renew Money Transmission License, Notice of Intent to Issue Order to Cease and Desist, Notice of Intent to Impose Civil Penalty and Notice of Right to Hearing (collectively, the “Order and Notice”) against Coinme, which Order and Notice is incorporated by reference herein;

WHEREAS, the Commissioner alleged in the Order and Notice that Coinme: (1) engaged an entity (the “Company”) to perform functions constituting money transmission activities in this state without establishing an authorized delegate relationship, in violation of Section 36a-607(a)(1) of the Connecticut General Statutes; (2) failed to maintain the minimum tangible net worth required of money transmission licensees, in violation of Sections 36a-600(d) and 36a-604(c) of the Connecticut General Statutes; (3) failed to establish, enforce, and maintain policies and procedures for supervising employees, agents and office operations that are reasonably designed to achieve compliance with applicable money transmission laws and regulations, in violation of Sections 36a-606a and 36a-607(c)(10) of the Connecticut General Statutes; and (4) that the totality of Respondent’s conduct is likely to otherwise materially prejudice the interests of Connecticut consumers, and cause Respondent to be engaged in unsafe or unsound practices within the meaning of Section 36a 608(a) of the Connecticut General Statutes;

WHEREAS, the Commissioner also alleged in the Order and Notice that the totality of Coinme’s conduct caused the Commissioner unable to find that Coinme’s financial condition is sound, its business will be conducted honestly, fairly, equitably, carefully and efficiently within the purposes and intent of Sections 36a-595 to 36a-612, inclusive, of the Connecticut General Statutes, in a manner commanding the confidence and trust of the community. If established, such failure would be sufficient grounds for the

Commissioner to deny an application for a money transmission license pursuant to subdivisions (1), (2) and (4) of Section 36a-600(a) of the Connecticut General Statutes;

WHEREAS, the Commissioner asserted that the allegations made in the Order and Notice constituted sufficient grounds to revoke and refuse to renew Coinme's license to engage in the business of money transmission in Connecticut pursuant to subdivisions (1) and (2) of Section 36a-608(b) of the Connecticut General Statutes and subsections (a) and (b) of Section 36a-51 of the Connecticut General Statutes, formed the basis to issue an order to cease and desist against Coinme pursuant to Sections 36a-608(c)(1) and 36a-52(a) of the Connecticut General Statutes and to impose a civil penalty of up to One Hundred Thousand Dollars (\$100,000) upon Coinme pursuant to Sections 36a-608(c)(1) and 36a-50(a) of the Connecticut General Statutes;

WHEREAS, on October 25, 2024, the Order and Notice was sent via electronic mail to the individual designated as the primary contact in the contact employee fields on NMLS, at the electronic mail address provided therein and was deemed received on the earlier of the date of actual receipt or seven days after such Order and Notice was sent;

WHEREAS, on November 8, 2024, Coinme requested a hearing, which is currently pending;

WHEREAS, Section 4-177(c) of the Connecticut General Statutes and Section 36a-1-55(a) of the Regulations of Connecticut State Agencies provide that a contested case may be resolved by consent order, unless precluded by law;

WHEREAS, the Commissioner and Coinme acknowledge the possible consequences of further administrative proceedings, and Coinme voluntarily agrees to consent to the entry of the conditions and terms imposed below without admitting or denying the allegations in the Order and Notice and set forth herein, and solely for the purpose of obviating the need for further administrative proceedings concerning the allegations in the Order and Notice and set forth herein;

WHEREAS, Coinme partnered with an unlicensed third-party entity, the Company, to perform certain money transmission activities on its behalf. Licensure is required of the Company unless an authorized delegate relationship exists via an authorized delegate contract, which, on January 4, 2024,

Coinme provided to the Commissioner via email and an upload to Coinme's company record within NMLS;

WHEREAS, Coinme's position was and remains that it has maintained minimum tangible net worth requirements under Sections 36a-600(d) and 36a-604(c) of the Connecticut General Statutes, having provided the Commissioner with financial statements as of September 30, 2024 as well as supplemental financial documentation at the request of the Department, dated March 19, 2025, indicating that it is in compliance with minimum tangible net worth requirements;

WHEREAS, in the course of the Examination and Investigation, the Department received four complaints from outside agencies related to Connecticut consumers ("Consumers") that reported losing personal funds as a result of scams. The Consumers used Coinme's services to send funds to the perpetrators of the scams;

WHEREAS, Coinme represents that it took steps and continues to take steps to ensure consumer protection and that policies, procedures, safeguards and controls are in place with respect to its services;

WHEREAS, the Commissioner and Coinme now desire to resolve the matters alleged in the Order and Notice and set forth herein;

WHEREAS, Coinme agrees to the language of this Consent Order;

WHEREAS, Coinme acknowledges that it has had the opportunity to consult with and be represented by independent counsel in negotiating and reviewing this Consent Order and executes this Consent Order freely;

WHEREAS, Coinme acknowledges that this Consent Order is a public record and is a reportable event for purposes of the regulatory disclosure questions on NMLS, as applicable;

AND WHEREAS, Coinme, through its execution of this Consent Order, voluntarily agrees to waive its procedural rights, including an opportunity for a hearing as it pertains to the allegations contained in the Order and Notice and set forth herein, and voluntarily waives its right to seek judicial review or otherwise challenge or contest the validity of this Consent Order.

CONSENT TO TERMS

WHEREAS, Coinme, through its execution of this Consent Order, consents to the Commissioner's entry of a Consent Order imposing the following terms:

1. Coinme shall continue to maintain the minimum tangible net worth required of money transmission licensees, in accordance with Sections 36a-600(d) and 36a-604(c) of the Connecticut General Statutes;
2. Coinme shall continue to provide monetary value to any properly validated unredeemed vouchers that are presented to Coinme by Connecticut residents;
3. Coinme shall establish, enforce, and maintain policies and procedures for supervising employees, agents and office operations that are reasonably designed to achieve compliance with applicable money transmission laws and regulations;
4. No later than the date this Consent Order is executed by Coinme, it shall remit to the Department of Banking by electronic funds transfer, cashier's check, certified check or money order made payable to "Treasurer, State of Connecticut", the sum of Ten Thousand Dollars (\$10,000) as a civil penalty; and
5. No later than thirty (30) days from the date this Consent Order is executed by Coinme, it shall provide restitution directly to the Connecticut consumers as identified and in the amount specified in Exhibit A attached hereto. These restitution payments shall be made by check or money order valid for ninety (90) days, and shall be mailed by registered or certified mail, return receipt requested, with proof of mailing. No later than seven (7) days after issuance of restitution payments, Coinme shall provide evidence of such payments to Swarupa Madhavan, Paralegal, Consumer Credit Division, Department of Banking, 260 Constitution Plaza, Hartford, Connecticut 06103-1800, or Swarupa.Madhavan@ct.gov.

CONSENT ORDER

NOW THEREFORE, the Commissioner enters the following:

1. The Terms set forth above be and are hereby entered;
2. The Order and Notice are terminated and superseded by this Consent Order;
3. Upon issuance of this Consent Order by the Commissioner, this matter will be fully and finally resolved; the Commissioner will not take any future enforcement action against Coinme based upon the allegations contained in the Order and Notice and set forth herein; provided that issuance of this Consent Order is without prejudice to the right of the Commissioner to take enforcement action against Coinme based upon a violation of this Consent Order or matters underlying its entry, if the Commissioner determines that compliance with the terms herein is not being observed or if any representation made by Coinme and reflected herein is subsequently discovered to be untrue;

4. Coinme shall not make, or permit to be made, any public statement, including in regulatory filings, any proceedings in any forum or otherwise, denying, directly or indirectly, any allegation referenced in this Consent Order. Nothing in this provision affects Coinme's (i) testimonial rights or obligations, or (ii) right to take any legal or factual positions that may contradict the allegations in this Consent Order in litigation or other proceedings;
5. Subject to the foregoing, and so long as this Consent Order is promptly disclosed by Coinme and its control persons on NMLS, as applicable, nothing in the issuance of this Consent Order shall adversely affect the ability of Coinme to apply for or obtain renewal licenses under Part V of Chapter 668, Sections 36a-595 *et seq.*, of the Connecticut General Statutes, provided that all applicable legal requirements for such licenses are satisfied and the terms of this Consent Order are followed;
6. This Consent Order shall be binding upon Coinme and its successors and assigns; and
7. This Consent Order shall become final when issued.

Issued at Hartford, Connecticut
this 24th day of September, 2025.

/s/
Jorge L. Perez
Banking Commissioner

I, Neil Bergquist, state on behalf of Coinme Inc. d/b/a Coinme that I have read the foregoing Consent Order; that I know and fully understand its contents; that I am authorized to execute this Consent Order on behalf of Coinme Inc. d/b/a Coinme; that Coinme Inc. d/b/a Coinme agrees freely and without threat or coercion of any kind to comply with the sanctions entered and terms and conditions ordered herein; and that Coinme Inc. d/b/a Coinme voluntarily agrees to enter into this Consent Order, expressly waiving the procedural rights set forth herein as to the matters described herein.

By: /s/
Name: Neil Bergquist
Title: CEO
Coinme Inc.
d/b/a Coinme

State of: Florida

County of: Broward

On this the 22nd day of September, 2025, before me, Cynthia Gomez, the undersigned officer, personally appeared in Neil Bergquist, who acknowledged himself/herself to be the CEO of Coinme Inc. d/b/a Coinme, a corporation and that he/she as such CEO, being authorized so to do, executed the foregoing instrument for the purposes therein contained, by signing the name of the corporation by himself/herself as CEO.

In witness whereof I hereunto set my hand.

/s/

Notary Public
Date Commission Expires: July 8, 2028