



CT Money Transmission License New Application Checklist (Company)

Section 36a-597(a) of the Connecticut General Statutes requires activity subject to licensure to be conducted at an office in a state, as defined in section 36a-2. State means any state of the United States, the District of Columbia, any territory of the United States, Puerto Rico, Guam, American Samoa, the trust territory of the Pacific Islands, the Virgin Islands and the Northern Mariana Islands.

CHECKLIST SECTIONS

- [General Information](#)
- [License Fees](#)
- [Requirements Completed in NMLS](#)
- [Requirements/Documents Uploaded in NMLS](#)
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GENERAL INFORMATION

The Connecticut Department of Banking participates in the Multistate Money Services Businesses Licensing Agreement Program (MMLA), which creates a more efficient money service business licensing process among state regulators. If your company is seeking money transmitter licensure in more than five (5) states, participation in the MMLA may be right for you. See the [Multistate MSB Licensing Agreement Program](#) page of the NMLS Resource Center for more information.

Who Is Required to Have This License?

This license is required for any person who engages in the business of money transmission in this state, or advertises or solicits such services.

“Money transmission” means engaging in the business of issuing or selling payment instruments or stored value, receiving money or monetary value for current or future transmission or the business of transmitting money or monetary value within the United States or to locations outside the United States by any and all means including, but not limited to, payment instrument, wire, facsimile, electronic transfer, or virtual currency kiosk. A person engaged in the business of money transmission is acting in this state under this section if such person:

- Has a place of business located in this state;
- Receives money or monetary value in this state or from a person located in this state;
- Transmits money or monetary value from a location in this state or to a person located in this state;
- Issues stored value or payment instruments that are sold in this state; or
- Sells stored value or payment instruments in this state.

Who Does Not Need This License?

- An authorized delegate of person licensed as a Connecticut money transmitter conducting its business in accordance with Section 36a-607 of the Connecticut General Statutes (“Authorized delegate” is defined in Section 36a-596 of the Connecticut General Statutes).

- Any federally insured federal bank, out-of-state bank, Connecticut bank, Connecticut credit union, federal credit union or out-of-state credit union, provided such institution does not engage in the business of money transmission in this state through any person who is not: (1) a federally insured federal bank, out-of-state bank, Connecticut bank, Connecticut credit union, federal credit union or out-of-state credit union; or (2) a person licensed as a Connecticut money transmitter or an authorized delegate acting on behalf of such person.
- The United States Postal Service (USPS) and any contractor that engages in the business of money transmission in this state on behalf of the USPS.
- A person whose activity is limited to the electronic funds transfer of governmental benefits for or on behalf of a federal, state or other governmental agency, quasi-governmental agency or government sponsored enterprise.
- Any Connecticut bank that is an uninsured bank organized pursuant to subsection (t) of section 36a-70.

Activities Authorized Under This License

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|------------------------------------------|---------------------------------------|
| • Electronic money transmitting | • Issuing traveler's checks |
| • Selling traveler's checks | • Issuing money orders |
| • Selling money orders | • Bill paying |
| • Issuing and/or selling drafts | • Transporting currency |
| • Issuing prepaid access/stored value | • Selling prepaid access/stored value |
| • Foreign currency dealing or exchanging | • Virtual currency |
| • Other – Money Services | |

Pre-Requisites for License Applications

- **Tangible Net Worth:** \$100,000 to \$1,000,000 minimum, dependent on business activities.
- **Bond Amount:** Between \$300,000 and \$1,000,000, dependent upon the volume of money transmission in Connecticut and business activities.
- **Financial Statement:** Audited Financial Statement reflecting net worth, which cannot be dated more than 12 months prior to the application date, must be provided via NMLS.
- **Total License Cost:** \$1,975 including NMLS processing fee.

Connecticut Department of Banking does not issue paper licenses for this license type.

Document Uploads Guidance

Documents that must be uploaded to the *Document Uploads* section of the Company Form (MU1) in NMLS are indicated in the checklist below. When uploading documents:

- Follow the guidance in [Document Upload Descriptions and Examples](#).
- Only upload documents relevant to the company application.
- Only upload documents where there is a selectable document category. If inappropriate documents are uploaded that should not be, you will be contacted by your regulator and asked to remove them from NMLS.
- Do not upload the same company documents multiple times. Generally, unless the document is state-specific, if the document has already been uploaded for another state, a new upload is not required unless changes have been made.
- If a document previously uploaded has been revised, delete the old document and replace it with the new document (history of the old document will remain in NMLS).
- For state-specific documents (e.g., Surety Bonds), be sure to indicate the applicable state.

Helpful Resources

- [Company Form \(MU1\) Filing Instructions](#)
- [Document Upload Descriptions and Examples](#)
- [Individual Form \(MU2\) Filing Quick Guide](#)
- [Financial Statements Quick Guide](#)
- [Payment Options Quick Guide](#)
- [License Status Definitions Quick Guide](#)

Agency Contact Information

Contact Consumer Credit staff by phone at (860) 240-8225 or send your questions via email to dob.ccl@ct.gov for additional assistance.

*Connecticut Department of Banking
Consumer Credit Division
260 Constitution Plaza
Hartford, CT 06103-1800*

THE APPLICANT/LICENSEE IS FULLY RESPONSIBLE FOR ALL OF THE REQUIREMENTS OF THE LICENSE FOR WHICH THEY ARE APPLYING. THE AGENCY SPECIFIC REQUIREMENTS CONTAINED HEREIN ARE FOR GUIDANCE ONLY TO FACILITATE APPLICATION THROUGH NMLS. SHOULD YOU HAVE QUESTIONS, PLEASE CONSULT LEGAL COUNSEL.

LICENSE FEES - Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.

| Complete | CT Money Transmission License | Submitted via... |
|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| <input type="checkbox"/> | CT License/Registration Fee: \$1,875 NMLS Initial Processing Fee: \$100 | NMLS (Filing submission) |
| <input type="checkbox"/> | Credit Report for MU2 Individual: \$15 per person. | NMLS |
| <input type="checkbox"/> | FBI Criminal Background Check for MU2 Individual: \$36.25 per person. | NMLS |
| <input type="checkbox"/> | <p>Uniform Authorized Agent Reporting Annual Processing Fee: An annual fee of twenty-five cents (\$0.25) for each active authorized agent/delegate location reported through NMLS is invoiced on November 1st.</p> <p>There is no fee for the first 100 active agents reported (Companies with 100 agents or less are not subject to the UAAR Processing Fee).</p> <p>The fee is capped at \$25,000 per licensee in any one year.</p> <p>The invoiced amount is based on the number of active agents in the system as of August 16th, (day after third quarter reporting deadline).</p> <p>See the Uniform Authorized Agent Reporting Processing Fee Fact Sheet for more info.</p> | NMLS (Agency Fee Invoice) |

REQUIREMENTS COMPLETED IN NMLS

| Complete | CT Money Transmission License | Submitted via... |
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| <input type="checkbox"/> | Submission of Company Form (MU1): Complete and submit the Company Form (MU1) in NMLS. This form serves as the application for the license through NMLS. | NMLS |
| <input type="checkbox"/> | <p>Authorized Agents (Delegates) Locations: Licensees must use the NMLS Uniform Authorized Agent Reporting (UAAR) functionality to report Authorized Agents. Upon license approval, applicants are required to utilize the UAAR to upload a list of agents who are authorized to conduct money transmission business in Connecticut on the Applicant's behalf. Agent adjustments (additions, deletions, and modifications) must be submitted through the UAAR within 15 days of the adjustment. If there are no changes to report, a submission must be made at minimum on a <i>quarterly</i> basis.</p> <p>For more information, consult the NMLS Resource Center.</p> | NMLS |
| <input type="checkbox"/> | <p>Other Trade Name: If operating under a name that is different from the applicant's legal name, that name ("Trade Name", "Assumed Name" or "DBA") must be listed under the <i>Other Trade Names</i> section of the Company Form (MU1). Connecticut does not limit the number of other trade names.</p> <p>Note: It is the applicant's responsibility to ensure that all names are properly registered with the required municipality or government agency.</p> | NMLS |
| <input type="checkbox"/> | Resident/Registered Agent: The Resident/Registered Agent must be listed under the <i>Resident/Registered Agent</i> section of the Company Form (MU1) and must match the information currently on record with the Connecticut Secretary of the State. | NMLS |

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| <input type="checkbox"/> | <p>Primary Contact Employees: The following individuals must be entered into the <i>Contact Employees</i> section of the Company Form (MU1):</p> <ol style="list-style-type: none"> 1. Primary Company Contact 2. Primary Consumer Complaint Contact (Regulator) | <p>NMLS</p> |
| <input type="checkbox"/> | <p>Non-Primary Contact Employees: Individual(s) should be identified for the following areas in the <i>Contact Employees</i> section of the Company Form (MU1):</p> <ol style="list-style-type: none"> 1. Accounting 2. Exam Billing 3. Licensing 4. Consumer Complaint (Public) 5. Exam Delivery 6. Litigation 7. Consumer Complaint (Regulator) 8. Legal 9. Pre-Exam Contact | <p>NMLS</p> |
| <input type="checkbox"/> | <p>Financial Statements: Upload an audited financial statement prepared by a Certified Public Accountant in accordance with Generally Accepted Accounting Principles dated within 90 days of your fiscal year end. Financial statements should include a balance sheet, income statement, and statement of cash flows and all relevant notes thereto.</p> <ul style="list-style-type: none"> • If applicant is a wholly-owned subsidiary of another corporation, (a) the applicant's or the parent corporation's most recent audited consolidated annual financial statement and (b) the applicant's most recent audited unconsolidated annual financial statement, including balance sheet, receipts, and disbursements for the preceding year • If the applicant is a publically traded entity, a copy of the most recent 10-K report filed with the SEC • If the applicant is a wholly-owned subsidiary of a publicly traded company, a copy of the parent company's most recent 10-K report filed with the SEC • If the applicant or parent company of a wholly owned subsidiary applicant is publicly traded on a foreign exchange, documentation similar to the 10-K report filed with the applicable securities regulator • If the applicant has operated for not more than one calendar year, the applicant shall only be required to include an initial statement of condition <p>MAINTAIN AT ALL TIMES THE FOLLOWING TANGIBLE NET WORTH:</p> <ul style="list-style-type: none"> • If you issue or sell payment instruments in this state which are checks, drafts or money orders – at least \$100,000 • If you issue or sell payment instruments in this state which are travelers checks or electronic payment instruments – at least \$1,000,000 • If you engage in the business of money transmission in this state, except by issuing or selling stored value or payment instruments – at least \$500,000 • If you issue or sell stored value in this state – at least \$1,000,000, or a higher amount as determined by the commissioner • If you engage in virtual currency activities – at least \$1,000,000 <p>Note: Financial statements are uploaded separately under the Filing tab and <i>Financial Statement</i> submenu link. See the Financial Statements Quick Guide for instructions.</p> | <p>NMLS</p> |

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| <input type="checkbox"/> | Bank Account: The following bank account information must be completed for the company's Operating accounts in the <i>Bank Account</i> section of the Company Form (MU1): <ul style="list-style-type: none"> • Account Type • Name of Bank • Address of Bank • Account Number | NMLS |
| <input type="checkbox"/> | Approvals and Designation: Enter the company's FinCEN Registration <i>Confirmation Number</i> and <i>Filing Date</i> in the <i>Approvals and Designation</i> section of the Company Form. | NMLS |
| <input type="checkbox"/> | Disclosure Questions: Provide a complete and detailed explanation and document upload for each "Yes" response to Disclosure Questions made by the company or related control persons (MU2). See the Company Disclosure Explanations Quick Guide for instructions. | Upload in NMLS in the <i>Disclosure Explanations</i> section of the Company Form or Individual Form. |
| <input type="checkbox"/> | Qualifying Individual: A Qualifying Individual must be designated for the main office in the Qualifying Individual section of Company Form (MU1). A Qualifying Individual is an individual who is responsible for the actions of the licensee. | NMLS |
| <input type="checkbox"/> | Qualified Individual (MU2) Attestation: Complete the Individual Form (MU2) in NMLS. This form must be attested to by the applicable qualified individual before it is able to be submitted along with the Company Form (MU1). | NMLS |
| <p>Note: Control Person means, "any individual in control of a licensee or applicant, any individual who seeks to acquire control of a licensee or a key individual."</p> <p>Key Individual means, "any individual ultimately responsible for establishing or directing policies and procedures of the licensee, including, but not limited to, an executive officer, manager, director or trustee."</p> <p>Control means, "(A) the power to vote, directly or indirectly, at least twenty-five per cent of the outstanding voting shares or voting interests of a licensee or person in control of a licensee; (B) the power to elect or appoint a majority of key individuals or executive officers, managers, directors, trustees or other persons exercising managerial authority of a person in control of a licensee; or (C) the power to exercise, directly or indirectly, a controlling influence over the management or policies of a licensee or person in control of a licensee. For purposes of this subdivision: (i) A person is presumed to exercise a controlling influence when the person holds the power to vote, directly or indirectly, at least ten per cent of the outstanding voting shares or voting interests of a licensee or person in control of a licensee, (ii) a person presumed to exercise a controlling influence can rebut such presumption if the person is a passive investor, and (iii) to determine the percentage of control, a person's interest shall be aggregated with the interest of any other immediate family member, including the person's spouse, parent, child, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law and any other person who shares the person's home."</p> | | |
| <input type="checkbox"/> | Direct Owner/Executive Officer and Control Person (MU2) Attestation: Complete the Individual Form (MU2) in NMLS. This form must be attested to by the applicable person before it is able to be submitted along with the Company Form (MU1). | NMLS |
| <input type="checkbox"/> | Credit Report for MU2 Individual: \$15 per person. | NMLS |
| <input type="checkbox"/> | Credit Report: MU2 Individuals are required to authorize a credit report through NMLS. Individuals will be required to complete an Identity Verification Process (IDV) along with an individual attestation before a license request for your company can be filed through NMLS. This authorization is made when the Individual Form (MU2) is submitted as part of the Company Form (MU1). | NMLS |

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| <input type="checkbox"/> | FBI Criminal Background Check for MU2 Individual: \$36.25 per person. | NMLS |
| <input type="checkbox"/> | <p>MU2 Individual FBI Criminal Background Check Requirements: MU2 Individuals on the Company Form (MU1) are required to authorize an FBI criminal background check (CBC) through NMLS.</p> <p>After authorizing an FBI criminal background check through the submission of the Company Form (MU1) and Individual Form (MU2), you must schedule an appointment to be fingerprinted if new prints are required.</p> <p>See the Criminal Background Check section of the NMLS Resource Center for more info.</p> <p>Note: If you are able to 'Use Existing Prints' to process the FBI criminal background check, you DO NOT have to schedule an appointment. NMLS will automatically submit the fingerprints on file.</p> | NMLS |
| REQUIREMENTS/DOCUMENTS UPLOADED IN NMLS | | |
| Complete | CT Money Transmission License | Submitted via... |
| <input type="checkbox"/> | <p>AML/BSA Policy: Upload the most recent version of Anti-Money Laundering (AML) / Bank Secrecy Act (BSA) Policy (must identify AML/BSA Officer).</p> <p>This document should be named <i>AML/BSA Policy [approval date mm-dd-yyyy]</i>.</p> | <p>Upload in NMLS: under the Document Type <u>AML/BSA Policy</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> |
| <input type="checkbox"/> | <p>Business Plan: Upload a business plan outlining the following information:</p> <ul style="list-style-type: none"> • Marketing strategies • Products • Target markets • Fee schedule • Operating structure the applicant intends to employ • Whether or not business activities will include the transmission of virtual currency <p>This document should be named <i>[Company Legal Name] Business Plan</i>.</p> <p>Note: If the existing uploaded business plan already includes the above information, an additional document does not need to be uploaded. A company should only upload a single business plan. If state-specific material is required, this information should be added to the existing uploaded business plan.</p> | <p>Upload in NMLS: under the Document Type <u>Business Plan</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> |
| <input type="checkbox"/> | Certificate of Authority/Good Standing Certificate: Applicant must register with the Connecticut Secretary of the State as applicable. | N/A |
| <input type="checkbox"/> | <p>Document Samples: Upload copies of the following sample documents used in the regular course of business in connection with this license:</p> <ul style="list-style-type: none"> • A sample of the contract used for authorized agents evidencing the proposed arrangement between the applicant and the authorized agent <p>This document should be named <i>Sample Contract – Authorized Agent</i>.</p> | <p>Upload in NMLS: under the Document Type <u>Document Samples</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> |

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| <input type="checkbox"/> | <p>Flow of Funds Structure: Submit a description of each type of transaction or service to be conducted. For each type, describe each step starting with the first encounter with the consumer and ending at the completion of the transaction when money is received by the beneficiary. Clearly indicate the flow of client funds to each account, and identify the owner of the account.</p> <p>This document should be named <i>Flow of Funds Structure</i>.</p> <p>Note: If submitting multiple types of transactions or services to be conducted, combine in single document for upload.</p> | <p>Upload in NMLS: under the Document Type <u>Flow of Funds Structure</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> |
| <input type="checkbox"/> | <p>Formation Documents: Determine classification of applicant's legal status and submit a State certified copy of the applicable documentation detailed below. Original formation documents and all subsequent amendments including a list of any name changes.</p> <p>General Partnership:</p> <ul style="list-style-type: none"> Partnership Agreement (including all amendments). <p>Limited Liability Company:</p> <ul style="list-style-type: none"> Articles of Organization (including all amendments); <p>Corporation:</p> <ul style="list-style-type: none"> Articles of Incorporation (including all amendments) <p>This document should be named <i>Formation Documentation [Date of Creation]</i>.</p> | <p>Upload in NMLS: under the Document Type <u>Formation Document</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> |
| <input type="checkbox"/> | <p>Management Chart: Submit a Management Chart displaying the applicant's directors, officers, and managers (individual name and title). Must also identify compliance reporting and internal audit structure. If the existing uploaded Management Chart already includes the above information, an additional document does not need to be uploaded. A company should only upload a single Management Chart.</p> <p>This document should be named <i>[Company Legal Name] Management Chart</i>.</p> | <p>Upload in NMLS: under the Document Type <u>Management Chart</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> |
| <input type="checkbox"/> | <p>Organizational Chart/Description: Submit a chart showing (or a description which includes) the percentage of ownership of:</p> <ul style="list-style-type: none"> Direct Owners (total direct ownership percentage must equate to 100%) Indirect Owners Subsidiaries and Affiliates of the applicant/licensee <p>This document should be named <i>[Company Legal Name] Organizational Chart-Description</i>.</p> <p>Note: If the existing uploaded Organizational Chart/Description already includes the above information, an additional document does not need to be uploaded.</p> | <p>Upload in NMLS: under the Document Type <u>Organizational Chart/Description</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> |
| <input type="checkbox"/> | <p>Permissible Investments: Submit a list of the company's permissible investments, the book and market value of such investments, and the dollar amount of the company's aggregate outstanding money transmissions as of the date of the most recent audited financial statement and no earlier than 30 business days prior to the filing of the application.</p> <p>This document should be named <i>[Company Legal Name] Permissible Investments</i>.</p> | <p>Upload in NMLS: under the Document Type <u>Permissible Investments</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> |

| <input type="checkbox"/> | <p>Electronic Surety Bond: Electronic Surety Bond via NMLS in the amount described below, furnished and submitted by a surety company authorized to conduct business in CT. See the ESB Adoption Table and the ESB for NMLS Licensees page of the NMLS Recourse Center for more information.</p> <p>Surety Bond Requirements Table</p> <table><tr><th><i>Principal Amount Required</i></th><th><i>Average Weekly Amount of Money Transmissions in CT</i></th></tr><tr><td>\$300,000</td><td>< \$300,000 for the most recent twelve-month period ending 6/30</td></tr><tr><td>\$500,000</td><td>≥ \$300,000 but ≤ \$500,000 for the most recent twelve-month period ending 6/30</td></tr><tr><td>\$1,000,000</td><td>> \$500,000 for the most recent twelve-month period ending 6/30</td></tr></table> <p>Note: For applicants who will engage in the business of transmitting virtual currency, such bond shall be in a principal sum of \$1,000,000 as determined by the Commissioner.</p> | <i>Principal Amount Required</i> | <i>Average Weekly Amount of Money Transmissions in CT</i> | \$300,000 | < \$300,000 for the most recent twelve-month period ending 6/30 | \$500,000 | ≥ \$300,000 but ≤ \$500,000 for the most recent twelve-month period ending 6/30 | \$1,000,000 | > \$500,000 for the most recent twelve-month period ending 6/30 | <p>Electronic Surety Bond in NMLS</p> |
|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|------------------|-----------------------------------------------------------------|------------------|---------------------------------------------------------------------------------|--------------------|-----------------------------------------------------------------|----------------------------------------------|
| <i>Principal Amount Required</i> | <i>Average Weekly Amount of Money Transmissions in CT</i> | | | | | | | | | |
| \$300,000 | < \$300,000 for the most recent twelve-month period ending 6/30 | | | | | | | | | |
| \$500,000 | ≥ \$300,000 but ≤ \$500,000 for the most recent twelve-month period ending 6/30 | | | | | | | | | |
| \$1,000,000 | > \$500,000 for the most recent twelve-month period ending 6/30 | | | | | | | | | |
| <input type="checkbox"/> | <p>Investment in Lieu of Bond: If the applicant is seeking approval to use investments in lieu of all or part of the bond pursuant to Section 36a-602 of the C.G.S.:</p> <p>Investment in Lieu of All of Bond</p> <ul style="list-style-type: none">• Provide the list of the investments maintained in accordance with Section 36a-602(d) and the book and market values of any such investments (i) as of the date of the financial statement required above and (ii) as of a date no earlier than 30 business days prior to the filing of the application. Applicant must complete an Authorization to Disclose Deposit Information form. <p>Investment in Lieu of Part of Bond</p> <ul style="list-style-type: none">• Complete all requirements set forth for submitting a Surety Bond and Investment in Lieu of All of Bond | <p>Upload in NMLS: under the Document Type Surety Bond in the <i>Document Uploads</i> section of the Company Form (MU1).</p> <p>Note: This item must also be mailed to the agency.</p> | | | | | | | | |
| <input type="checkbox"/> | <p>Virtual Currency: Applicant must answer the additional disclosure question regarding whether business activities will include the transmission of virtual currency.</p> | <p>Upload in NMLS: under the Document Type Additional Requirements in the <i>Document Uploads</i> section of the Company Form (MU1).</p> | | | | | | | | |