



Multistate MSB Licensing Program

Phase One Application Checklist

CHECKLIST SECTIONS

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GENERAL INFORMATION

Completion of Phase One does not lead to a license in each state. Before a license will be issued a Phase Two must be completed in each state. Applicants should see each state's "Phase Two" information below for the states they are interested in. This document provides the particulars about what activities are covered under that state's money transmitter license type and the applicable pre-requisites for license applications. Please note, however, that each state is the final authority on what is required for licensure in their state. Contact that state directly with any questions.

Potential Disqualifiers from the Multistate Protocol

- Company is headquartered outside the United States
- Company provides services to the marijuana industry
- Company, company's parent, or a subsidiary, affiliate, or control person of the company or parent has prior unlicensed activity
- A control person has a felony or a financially-related or dishonesty-related misdemeanor within the last 10 years

Activities Authorized Under This License

Note: Several of the states have different license types. Please verify you are applying for the correct type of license. See the table below. If you have questions about the correct license type or whether a license is needed, please contact the requisite state agency. Each state is the final authority on whether a license is required.

1. Georgia has 2 license types: MT (Money Transmission) and SPI (Seller of Payment Instruments).
2. Massachusetts has 2 license types: FTA (Foreign Transmittal Agency) and CS (Check Seller).
4. Minnesota, South Carolina, Vermont, and Washington have 2 license types: MT (Money Transmission) and CX (Currency Exchange) – Minnesota's CX license only covers check cashing. Vermont's CX license covers check cashing in addition to currency exchange. South Carolina and Washington's MT license covers currency exchange; CX licenses should only be obtained for companies wishing to do only currency exchange. CX licenses aren't covered under the MMLA and must be obtained directly from that state.
5. Connecticut, Georgia, Louisiana, Maryland, Massachusetts, Ohio, Rhode Island, South Carolina, Tennessee, Utah, and Washington also have another license type, CC (Check Cashing), but it isn't covered under the MMLA.
6. Maine's Money Transmitter License allows for CC (Check Cashing) and CX (Currency Exchange). If the applicant only needs a CC and/or CE license, then they should contact the state directly. The CC and CE licenses are handled outside of NMLS.

Note: Several of the states also have limitations on the type of activity they regulate

1. Illinois regulates selling prepaid access but not the issuance of prepaid access.
2. Massachusetts only regulates foreign transmissions and not domestic-only transactions (FTA).
3. Michigan regulates closed-loop prepaid access only if the funds on it exceed \$2,000 on any day.
4. Indiana, North Carolina, and Wyoming only regulate activity for personal, family, or household use.

	Electronic money transmission		Issue/sell prepaid access	Exchange/deal in foreign currency	Issue/sell drafts	Pay bills		Transport currency	Issue/sell money orders	Cash checks	Issue/sell traveler's checks	Virtual currency
CA	MT		MT	?	MT	?		X	MT	?	MT	?
CT	MT		MT	MT	MT	MT		MT	MT	CC	MT	MT
GA	MT	SPI	SPI	?	SPI	MT	SPI	X	SPI	CC	SPI	?
ID	MT		MT	X	MT	MT		MT	MT	X	MT	?
IL	MT		MT	MT	X	X		X	MT	X	MT	?
IN	MT		MT	?	MT	X		X	MT	X	MT	?
IA	MT		MT	MT	MT	MT		X	MT	X	MT	MT
KS	MT		MT	MT	MT	MT		X	MT	X	MT	?
KY	MT		MT	MT	MT	MT		X	MT	X	MT	X
LA	SoC		SoC	X	SoC	X		X	SoC	CC	SoC	?
ME	MT		MT	?	MT	MT		?	MT	?	MT	MT
MD	MT		MT	?	MT	?		X	MT	CC	MT	?
MA	FTA		CS	FTA	X	X		X	CS	CC	CS	X
MI	MT		MT	X	MT	X		X	MT	X	MT	?
MN	MT		MT	?	MT	?		X	MT	CX	MT	?
MS	MT		MT	MT	MT	MT		MT	MT	X	MT	?
NE	MT		MT	?	MT	MT		X	MT	X	MT	?
NC	MT		MT	X	MT	?		X	MT	MT	MT	MT
ND	MT		MT	X	MT	MT		MT	MT	X	MT	X
OH	MT		MT	MT	MT	MT		X	MT	CC	MT	MT
RI	CT ¹		CT	X	CT	CT		X	CT	CC	CT	CT
SC	MT		MT	MT	CX	MT	MT	X	MT	CC	MT	?
SD	MT		MT	MT	MT	MT		MT	MT	X	MT	MT
TN	MT		MT	MT	MT	MT		MT	MT	CC	MT	?
TX	MT		MT	MT	X	MT		MT	MT	X	MT	?
UT	MT		MT	X	MT	MT		X	MT	CC	MT	X
VT	MT		MT	MT	CX	MT	MT	X	MT	MT	CX	MT
WA	MT		MT	MT	CX	MT	MT	MT	MT	CC	MT	MT
WY	MT		MT	MT	MT	MT		X	MT	X	MT	X

? = Contact the state agency for guidance X = no license needed

¹ Currency Transmitter License

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 it has changed.
- 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., Document Samples), 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

California Department of Financial Protection and Innovation

Jonathan Lee: (213) 435-3921 or Jonathan.Lee@dfpi.ca.gov

Oscar Lumen: (415) 263-8577 or Oscar.Lumen@dfpi.ca.gov

Connecticut Department of Banking

(860) 240-8225 or dob.ccl@ct.gov

Georgia Department of Banking and Finance, Non-Depository Financial Institutions Division:

(770) 986-1136 or MSB@dbf.state.ga.us

Idaho Department of Finance Securities Department:

(208) 332-8004 or norman.real@finance.idaho.gov

Illinois Department of Financial and Professional Regulation, Consumer Credit Section:

(312) 793-5651

Indiana Department of Financial Institutions, Consumer Credit Division

(317) 453-2539 or dfilicensing@dfi.in.gov

Iowa Division of Banking Finance Bureau:

(515) 281-4014 or fblicensing@idob.state.ia.us

Kansas Office of the State Bank Commissioner:

Bailey Burghart: (785)296-1744 or MTLicensing@osbckansas.org

Kentucky Department of Financial Institutions, Non-Depository Division:

Jonathan Bright: (844)-354-0611 or Jonathan.Bright@KY.gov

Louisiana Office of Financial Institutions, Depository Division

Michelle Jeansonne: (225) 925-3828 or mjeansonne@ofi.la.gov

Maine Department of Professional & Financial Regulation, Bureau of Consumer Credit Protection

Mark E. Susi: (207) 624-8527 or Mark.E.Susi@maine.gov

Maryland Commissioner of Financial Regulation

(410) 230-6155 or (888) 784-0136

Massachusetts Division of Banks:

Wesley Ho: (617) 956-1500 ext. 61562 or nmls@mass.gov

Michigan Department of Insurance and Financial Services, Consumer Finance Section

(877) 999-6442 or difs-fin-info@michigan.gov

Minnesota Department of Commerce, Financial Institutions Division:

(651) 539-1600 or robin.brown@state.mn.us

Mississippi Department of Banking and Consumer Finance

(601)321-6901 or jenny.teasley@dbcf.ms.gov

Nebraska Department of Banking and Finance

(402) 471-2171 or dob.consumerfinance@nebraska.gov

North Carolina Commissioner of Banks Office

Lisa Johnson at ljohnson@nccob.gov

North Dakota Department of Financial Institutions, Consumer Division:

(701) 328-9933 or dfi@nd.gov

Ohio Division of Financial Institutions:

(614) 728-2636 or Michael.Sabula@com.state.oh.us

Rhode Island Department of Business Regulation, Division of Banking:

(401) 462-9503 or dbr.bankinquiry@dbr.ri.gov

South Carolina Office of the Attorney General, Money Services Division:

(803) 734-1221 or MSB@scag.gov

South Dakota Division of Banking

(605) 773-3421 or DLR.BankingLicensing@state.sd.us

Tennessee Department of Financial Institutions:

David Axford: (615) 268-6329 or david.axford@tn.gov

Texas Department of Banking, Corporate Activities Division:

(512) 475-1342 or carrie.lemke@dob.texas.gov

Utah Department of Financial Institutions:

(801) 538-8830 or pcline@utah.gov

Vermont Department of Financial Regulation:

(802) 828-3307 or DFR.NMLS1@vermont.gov

Washington Department of Financial Institutions, Consumer Services:

(360) 902-8703 or CSLicensing@dfi.wa.gov

Wyoming Department of Audit, Division of Banking

(307) 777-7797 or wyo.divisionofbanking@wyo.gov

THE APPLICANT 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.

Multistate Protocol - MSB Phase One Requirements

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

Complete	Money Transmitter	Submitted via...
<input type="checkbox"/>	<p>Application and license fees:</p> <ul style="list-style-type: none"> • CA: \$5,000 • CT: \$1,975 • GA MT: \$1,150 • GA SPI: \$2,150 • ID: \$100 • IL: \$200 • IN: \$1,000 • IA: \$1,500 • KS: \$1,750 • KY: \$1,100 • LA: \$800 • MA: \$1,300 • MD: \$3,100 • ME: \$500 • MI: \$3,650 plus \$50 per location • MN: \$4,000 • MS: \$800 • NC: \$1,500 • ND: \$950 • NE: \$1,000 • OH: \$5,000 • RI: \$1,500 • SC: \$2,250 • SD: \$1,600 • TN: \$100 plus \$250 for 1-4 agents or \$500 for 5+ agents • TX: \$10,000 plus investigation fee, if necessary • UT: \$300 • VT: \$1,500 • WA: \$1,100 • WY: \$1,500 	<p>NMLS</p> <p>Note: The application fee for the Phase One Certifying State will be collected during the initial Company Form (MU1) Submission.</p> <p>Remaining application fees will be collected when the applicant submits a Phase Two application for the signatory states</p>
<input type="checkbox"/>	<p>Credit Report for Control Persons: \$15 per control person.</p>	<p>NMLS (Filing submission)</p>
<input type="checkbox"/>	<p>Criminal Background Check: \$36.25 per person</p>	<p>NMLS (Filing submission)</p>
<p>Note</p>	<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>Note: This requirement applies in the following states: CT, GA, IL, IN, IA, KS, KY, ME, MD, MI, MN, MS, NE, NC, ND, RI, SC, UT, VT, WA, WY</p>	<p>NMLS (Agency Fee Invoice)</p> <p>See the Uniform Authorized Agent Reporting Processing Fee Fact Sheet for more information.</p>

Complete	MSB Phase One Requirements	Submitted via...
<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/registration through NMLS.	NMLS
<input type="checkbox"/>	Other Trade Name: If operating under a name that is different from the 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). Note: There is no limit to the number of other trade names allowed, except in Illinois and Massachusetts (only one Other Trade Name allowed).	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 applicable Secretary of State.	NMLS
<input type="checkbox"/>	Primary Contact Employees: The following individuals must be entered into the <i>Contact Employees</i> section of the Company Form (MU1). 1. Primary Company Contact. 2. Primary Consumer Complaint Contact.	NMLS
<input type="checkbox"/>	Non-primary Contact Employees: The following individuals must be entered into the <i>Other Contact Employees</i> section of the Company Form (MU1). 1. Company Contact for Licensing. 2. Company Contact for Legal. 3. Company Contact for Exams (pre-exam, billing, and delivery).	NMLS
<input type="checkbox"/>	Approvals and Designation: Enter your FinCEN Registration <i>Confirmation Number</i> and <i>Filing Date</i> (if required) in the <i>Approvals and Designation</i> section of the Company Form (MU1).	NMLS
<input type="checkbox"/>	Bank Account for transactions on behalf of clients: Identify all bank account(s) used for your money transmission activities, including operating, trust, and line or letter of credit accounts in the <i>Bank Account</i> section of the Company Form (MU1). The account(s) must be business accounts in the name of the applicant.	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.	NMLS Upload in NMLS in the <i>Disclosure Explanations</i> section of the Company Form (MU1) or Individual Form (MU2).

Complete	MSB Phase One Requirements	Submitted via...
□	<p>Qualifying Individual: If you are applying in one or more of the following states you must list an individual that meets the requirements in the <i>Qualifying Individual</i> section of the Company Form (MU1).</p> <p>CT: The Qualifying Individual (QI) is responsible for the actions of the licensee and must be designated for the licensed location.</p> <p>KY: The Responsible Individual (RI) is employed by the licensee and has principal managerial authority over the provision of money services in KY.</p> <p>IN: The QI is in charge of money transmission activities. Requires two years verifiable experience in the business of money transmission.</p> <p>MD: The QI is the sole proprietor, coventurer, general partner, principal officer or member who has <u>at least 3 years of experience</u> in the money transmission business, or other related financial services business.</p> <p>MA: The QI is known as the Location Manager and must be on-site at all locations where the applicant conducts business in Massachusetts.</p> <p>MI: The QI is an individual responsible for operations in Michigan.</p> <p>RI: The QI (formerly known as the Manager of Record of the main office)</p> <p>TN: QIs include the following (see Tennessee Code Annotated (TCA)): - “Executive officers” as defined by TCA §45-7-203(6) - “Key shareholders” as defined by TCA §45-7-203(7) -Direct or indirect “controlling persons” as defined by TCA §45-7-203(5) -Members of the applicant’s board of directors or managing members of a LLC or any individual performing a similar role for the applicant -Any individual in a position to exercise control over or the direction of, the applicant’s business, regardless of the applicant’s form of organization -Officers or managers in charge of applicant’s money services.</p> <p>TX: Any individual that falls under the definition of RI found in § 151.002(b)(20) of the Code.</p> <p>VT: The QI is the on-site manager for the corporate location and must: * Be employed by the applicant; * Work on-site at the main office location; * Live within a reasonable commuting distance of the office; * Provide a criminal background check and credit report through NMLS.</p> <p>WA: The RI must have principal managerial authority over the applicant’s money transmission services in Washington and must: * Be a citizen of the US or have legal immigration status to work in US * Hold W-2 employee status with the applicant; * Be knowledgeable of the laws and rules; and * Be responsible for the company’s compliance with the applicable state and federal laws, rules, and regulations.</p> <p>If the RI is not a US citizen, upload documents of the person’s right to work in the US. (Ex: Employment authorization Document, Permanent Residence Card, Visas of type H-1B, L-1B, or P)</p>	<p>NMLS</p> <p>Upload in NMLS under <u>Legal Name/Status</u> in the <i>Document Upload</i> section, if any.</p>

Complete	MSB Phase One Requirements	Submitted via...
<input type="checkbox"/>	<p>Individual (MU2) Attestation: Complete the Individual Form (MU2) in NMLS. This form must be attested to by the applicable individual before it is able to be submitted along with the Company Form (MU1). The following individuals, as specified below, are required to complete an MU2:</p> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>Direct Owners: Any individual that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of 10% or more of a class of voting security of the applicant or licensee.</p> </div> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>Executive Officers/Control Persons: Individuals, regardless of title, who have the power, directly or indirectly, to direct the management or policies of a company by contract or otherwise. Includes: Board of Directors; President, Executive Vice President, Senior Vice President, Treasurer, Secretary, or similarly elected or appointed senior corporate officers; Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Technology Officer, & Chief Compliance Officer/BSA Officer.</p> </div> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>Indirect Owners: Any individual that directly or indirectly, has the right to vote 10% or more of a class of a voting security or has the power to sell or direct the sale of 10% or more of a class of voting securities.</p> </div>	<p>NMLS</p>
<input type="checkbox"/>	<p>Credit Report: Individuals that submitted a MU2 are required to authorize a credit report through NMLS. In addition, 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).</p>	<p>NMLS Click here for instructions</p>
<input type="checkbox"/>	<p>Criminal Background Check (Fingerprints): Individuals that submitted a MU2 are required to authorize a FBI criminal background check (CBC) through NMLS. After authorizing a CBC, you must schedule an appointment to be fingerprinted if new prints are required. 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>	<p>NMLS Click here for instructions</p>
<input type="checkbox"/>	<p>Third Party Investigatory Background Checks: An investigative background report must be prepared by an acceptable search firm for any individual that is:</p> <ul style="list-style-type: none"> • Not a United States citizen and does not, or has not, resided in the US for at least 10 years • A US citizen but does not, or has not, resided in the United State for more than 2 consecutive years out of the last 10 years <p>The report must contain at least the following for the countries, states, towns, and contiguous areas where the individual worked or resided for the past 10 years:</p> <ul style="list-style-type: none"> • A comprehensive credit report/history • Civil court and bankruptcy court records, including judgments and liens • Criminal records, including felonies, misdemeanors, and violations • Regulatory history, including other licenses held • Employment history • Media history, including electronic search of national and local publications, wire services, and business publications 	<p>Email or mail, directly from the search firm, to the Phase One State</p>

Complete	MSB Phase One Requirements	Submitted via...
<input type="checkbox"/>	<p>Formation Documents: Determine classification of your legal status and submit a State certified copy of the requested applicable documentation detailed below. Provide original formation documents and all subsequent amendments thereto, including a list of any name changes.</p> <p>Sole Proprietor</p> <ul style="list-style-type: none"> • Applicable formation documents. <p>Unincorporated Association:</p> <ul style="list-style-type: none"> • By-Laws or constitution (including all amendments). <p>General Partnership:</p> <ul style="list-style-type: none"> • Partnership Agreement (including all amendments). <p>Limited Liability Partnership:</p> <ul style="list-style-type: none"> • Certificate of Limited Liability Partnership; and • Partnership Agreement (including all amendments). <p>Limited Partnership:</p> <ul style="list-style-type: none"> • Certificate of Limited Partnership; and • Partnership Agreement (including all amendments). <p>Limited Liability Limited Partnership:</p> <ul style="list-style-type: none"> • Certificate of Limited Liability Limited Partnership; and • Partnership Agreement (including all amendments). <p>Limited Liability Company (“LLC”):</p> <ul style="list-style-type: none"> • Articles of Organization (including all amendments); • Operating Agreement (including all amendments); • IRS Form 2553 or IRS Form 8832 if S-corp treatment elected; and • LLC resolution if authority not in operating agreement. <p>Corporation:</p> <ul style="list-style-type: none"> • Articles of Incorporation (including all amendments); • By-laws (including all amendments), if applicable; • Shareholder Agreement (including all amendments), if applicable; • IRS Form 2553 if S-corp treatment elected; and • Corporate resolution if authority to complete application not in By-Laws or Shareholder Agreement, as amended, as applicable. <p>Not for Profit Corporation</p> <ul style="list-style-type: none"> • Documents requested of a Corporation; and • Proof of nonprofit status <ul style="list-style-type: none"> ○ Internal Revenue Service (“IRS”) 501(c)(3) designation letter; or ○ Statement from a State taxing body/attorney general certifying that: <ul style="list-style-type: none"> (i) you are a nonprofit organization operating within the State; and (ii) no part of your net earnings may lawfully benefit any private shareholder or individual; or ○ Your certificate of incorporation or similar document if it clearly establishes your nonprofit status; or ○ Any of the preceding items described, if that item applies to a State or national parent organization, together with a statement by the State or parent organization that you are a local nonprofit affiliate. <p>Trust (Statutory)</p> <ul style="list-style-type: none"> • Certificate of Trust; and • Governing instrument (all amendments). 	<p>Upload in NMLS: under Formation Document in the <i>Document Uploads</i> section of the Company Form (MU1).</p> <p>Titled: <i>Formation Documentation [Date of Creation (MM-DD-YYYY)]</i>.</p>

Complete	MSB Phase One Requirements	Submitted via...
<input type="checkbox"/>	<p>Certificate of Authority/Good Standing Certificate: Upload a State-issued and approved document (typically by the Secretary of State’s office), dated not more than 60 days prior to the filing of the application through NMLS that demonstrates your authorization to do business in the state or country of incorporation/organization.</p>	<p>Upload in NMLS: under <u>Certificate of Authority/Good Standing</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> <p>Titled: <i>[State] Certificate of Authority OR Good Standing Certificate.</i></p>
<input type="checkbox"/>	<p>Business Plan: Upload a business plan outlining the following information:</p> <ul style="list-style-type: none"> • Executive Summary (Overview) • Marketing strategies • Target markets • Products/Services (provide: 1) list of states where application is pending and where currently licensed; 2) list of countries served; 3) description of products/services and the states in which they will be offered). • Fee schedule • Management/Organization Structure (provide a high-level overview of your: 1) corporate history; 2) parent & subsidiaries; and 3) management team) • Operational Plan (describe: 1) daily operations; 2) business processes; 3) typical flow of funds; 4) settlement, reconciliation, & reimbursement processes; 5) methods used to account for funds received in each state; 6) whether you will have authorized agents; 7) whether you will have correspondents or paying agents; and 8) the types of payments you will accept) <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 with a state-specific addendum to the plan.</p>	<p>Upload in NMLS under <u>Business Plan</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> <p>Titled: <i>[Company Legal Name] Business Plan.</i></p> <p>Do NOT indicate a specific state unless during Phase Two the state requires an addendum to the business plan. In that case, the addendum would be titled <i>[Company Legal Name] [State] Addendum to Business Plan.</i></p>
<input type="checkbox"/>	<p>Flow of Funds Structure: Submit a description of each type of transaction or service to be conducted. It may be presented in the form of a diagram, a narrative, or a combination of both. 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.</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 <u>Flow of Funds Structure</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> <p>Titled: <i>Flow of Funds Structure.</i></p>

Complete	MSB Phase One Requirements	Submitted via...
<input type="checkbox"/>	<p>Management Chart: Submit a Management chart displaying your divisions, directors, officers, and managers (individual name and title). Must also identify compliance reporting and internal audit structure. Should identify all control persons that are officers of the company.</p> <p>Note: 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>Upload in NMLS under <u>Management Chart</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> <p>Titled: <i>Management Chart.</i></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>Note: If the existing uploaded Organizational Chart/Description 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>Upload in NMLS under <u>Organizational Chart/Description</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> <p>Titled: <i>[Name] Organizational Chart - Description.</i></p>
<input type="checkbox"/>	<p>Authorized Agents (Delegates): If you will be using authorized agents, upload a full description of the screening process you use to select authorized delegates, including any forms used, and the method used to screen for criminal history</p>	<p>Upload in NMLS under <u>Document Samples</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p>
<input type="checkbox"/>	<p>AML/BSA Policy: Upload the most recent version of your Anti-Money Laundering (AML) / Bank Secrecy Act (BSA) Policy and the most recent independent review, if any.</p> <p>The AML/BSA Policy must have a company risk assessment included or as a stand-alone document. The risk assessment should evaluate all risk areas of the company, including areas such as products, services, customers, entities, volume, and geographic locations. While the provisions of the Bank Secrecy Act do not require a risk assessment in writing, in order to ensure an adequate anti-money laundering program is in place to prevent money laundering and/or terrorist financing the risks associated with a company must be evaluated.</p>	<p>Upload in NMLS under <u>AML/BSA Policy</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p> <p>Titled: <i>AML Policy [internally approved date] and AML/Policy Independent Review [review date].</i></p>
<input type="checkbox"/>	<p>Electronic Surety Bond: When submitting a license application through the MMLA program, during Phase 1 or Phase 2, the Company Form (MU1) will not be able to be submitted unless an executed Electronic Surety Bond has also been submitted through NMLS in the following states: GA, IN, IA, KS, MA, MI, MN, NE, ND, OH, RI, SC, SD, TN, TX, UT, VT, WY.</p> <p>See the ESB Adoption Table and the ESB for NMLS Licensees page of the NMLS Recourse Center for more information.</p>	<p>Electronic Surety Bond in NMLS</p> <p>Note: Surety bonds submitted via the <i>Document Uploads</i> section will not satisfy this requirement.</p>

Financial Statements: Financial statements must be prepared in accordance with Generally Accepted Accounting Principles (GAAP). If using consolidated financials, you must include a separate breakdown of all entities.

Provide the financial statements listed in the audited financials box. If you do not have audited financials, you may either provide the financials in the unaudited financial box, start-up box, or wholly-owned subsidiary box.

Audited financials	<ul style="list-style-type: none"> • Applicant’s audited financials for most recent year, plus prior two years (if available). <ul style="list-style-type: none"> ○ For publicly traded companies, the most recent Form 10K, plus prior 2 years (if available) may be submitted in lieu of audited financials. • Applicant’s unaudited interim financials for the most recent quarter end.
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Alternatives for companies without audited financials:

Unaudited financials	<ul style="list-style-type: none"> • Applicant’s unaudited financial statement as of most recent quarter end (balance sheet & income statement, at a minimum).
Start-up	<ul style="list-style-type: none"> • Applicant’s unaudited financial statement as of most recent quarter end (balance sheet & income statement, at a minimum). • Documents supporting method & source of capitalization (where funding for the business comes from). • Two-year projected financial statement.
Wholly-owned subsidiary	<ul style="list-style-type: none"> • Parent’s audited financials for most recent year, plus prior two years (if available). <ul style="list-style-type: none"> ○ Alternatively, the parent’s most recent Form 10K, plus prior 2 years (if available) may be submitted in lieu of the parent’s financials. • Applicant’s unaudited interim financials for the most recent quarter end.

Note: When submitting a license application through the MMLA program, during Phase 1 or Phase 2, the Company Form (MU1) will not be able to be submitted unless audited financial statements have also been submitted through NMLS in the following states: **CA, CT, IL, IN, IA, KY, ME, MD, NE, OH, SC, SD, TN, UT, VT.**

KS requires audited financials, but will accept audited parent financials or audited consolidated financials.

MA requires financials to be audited or reviewed by an independent CPA.

NC requires audited financials unless the company is a start-up, then will accept financials from the wholly-owned subsidiary or start-up boxes.

TX requires audited financials from the applicant and will not accept parent financials.

Review each state’s [Phase 2 Checklists](#) for more information.

Upload in NMLS

Note: Financial statements are uploaded separately under the Filing tab and *Financial Statement* submenu link. See the [Financial Statements Quick Guide](#) for instructions.

Note: Documents supporting method & source of capitalization and the two-year projected financial statement are uploaded separately in the *Additional Requirements* section of the Company Form (MU1).

Note: If you intend to use parent financials, contact the assigned Phase One Reviewing State for instructions on how to submit those financials. **DO NOT** upload parent financials.



Multistate Protocol Phase Two Requirements

Please submit a [Statement of No Material Changes](#) to NMLS when you begin your Phase Two applications. Click the link for the relevant state to review the Phase Two requirements for that state:

- [California-DFPI Money Transmitter License](#)
- [Connecticut Money Transmitter](#)
- [Georgia Money Transmitter or Seller of Payment Instruments](#)
- [Idaho Money Transmitter](#)
- [Illinois Money Transmitter](#)
- [Indiana- DFI Money Transmitter License](#)
- [Iowa Money Transmitter](#)
- [Kansas Money Transmitter](#)
- [Kentucky Money Transmitter](#)
- [Louisiana Sale of Checks and Money Transmitters](#)
- [Maine Money Transmitter](#)
- [Maryland Money Transmitter](#)
- [Massachusetts Foreign Transmittal Agency](#)
- [Massachusetts Check Seller](#)
- [Michigan Money Transmitter](#)
- [Minnesota Money Transmitter](#)
- [Mississippi Money Transmitter](#)
- [Nebraska Money Transmitter](#)
- [North Carolina Money Transmitter](#)
- [North Dakota Money Transmitter](#)
- [Ohio Money Transmitter](#)
- [Rhode Island Currency Transmitter License](#)
- [South Carolina Money Transmitter](#)
- [South Dakota Money Transmitter](#)
- [Tennessee Money Transmitter](#)
- [Texas-DOB Money Transmitter](#)
- [Utah Money Transmitter](#)
- [Vermont Money Transmitter](#)
- [Washington Money Transmitter](#)
- [Wyoming Money Transmitter](#)