

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

4 IN THE MATTER OF:

5 Coinme Inc.
6 NMLS #1185542

Respondent.

) ORDER NO. 24-136-C

) ORDER ASSESSING
) CIVIL PENALTIES AND
) CONSENT TO ORDER

7 The Director of the Department of Commerce, Community, and Economic
8 Development, Division of Banking and Securities (“Department”), has conducted an
9 investigation into certain activities of Coinme Inc. (“Respondent”) to determine whether
10 Coinme was in compliance with certain provisions of Alaska Statute (“AS”) 06.55 et seq.
11 (“Alaska Uniform Money Services Act or AUMSA”).

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

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

18 I. FINDINGS OF FACT

19 1. Respondent is a Virginia corporation as of August 29, 2024, per a certificate
20 of conversion uploaded by the Respondent into the Nationwide Multistate Licensing System
21 (“NMLS”). Respondent was first incorporated in Delaware on February 28, 2017, and
22 maintains a principal address of 255 S. King Street, Suite 800, Seattle, WA 98104.
23 Respondent has been issued a company license number by the NMLS of 1185542.

24 2. Respondent provides technology-driven financial services, including

1 providing the ability to purchase digital assets at select Coinstar machine locations with cash.
2 The Respondent also provides its customers with custodial wallets to store, send, and receive
3 digital assets also known as virtual or crypto currency.

4 3. NMLS is the system of record for license applications and information
5 provided by money service businesses.

6 4. Respondent has been licensed as a money transmitter in Alaska since July 19,
7 2021, and was issued license number AKMT-014762

8 5. On October 22, 2024, Department staff attempted to contact the Respondent
9 via their Customer Support phone number listed within NMLS with no success due to the
10 number no longer being active.

11 6. On October 22, 2024, Department staff attempted to contact the NMLS
12 Primary Consumer Complaint (Regulator) Contact and left a voicemail. The call was later
13 returned by ML who informed the Department that the number listed in NMLS was their
14 personal cell phone and that they were no longer employed by the Respondent.

15 7. On October 23, 2024, Department staff left a voicemail and sent an email to
16 the email addresses provided in NMLS for Chief Executive Officer Neil Bergquist and Chief
17 Legal and Compliance Officer Robert Villasenor. The Department set deficiencies for the
18 Respondent in NMLS informing the company of the failure to have working phone numbers
19 posted for consumers and state regulators.

20 8. On October 23, 2024, Mr. Villasenor promptly responded to the Department,
21 providing updated phone numbers for both consumers and regulators.

22 9. On October 30, 2024, the Department was contacted by outside counsel
23 representing the Respondent and they informed the Department that on October 28, 2024, the
24 Primary Consumer Complaint (Regulator) Contact and Customer Support phone numbers had

1 been updated in NMLS.

2 10. On November 14, 2024, outside counsel representing the Respondent
3 informed the Department that the Customer Support number had been inactive since June 10,
4 2024, as well as the Primary Consumer Complaint (Regulator) Contact number being
5 inaccurate since August 2, 2024.

6 **II. CONCLUSIONS OF LAW**

7 1. Respondent engages in “money transmission” in Alaska as defined under AS
8 06.55.990(15), 3 AAC 13.005, 3 AAC 13.006, 3 AAC 13.990(4) and (6) by receiving money
9 or monetary value for transmission including U.S. dollars and virtual currency.

10 2. For purposes of this Order, Respondent neither admits nor denies but consents
11 to the Department’s finding that Respondent violated AS 06.55.403(a) by failing to report to
12 the Department changes to the Respondent’s record in NMLS and to update the Respondent’s
13 record in NMLS, failing to update their operational customer support phone number for
14 consumers from June 10, 2024 to October 28, 2024 (137 days), and failing to update their
15 Primary Consumer Complaint (Regulator) Contact phone number in NMLS from August 2,
16 2024 to October 28, 2024 (85 days).

17 **III. ORDER**

18 Pursuant to the Alaska Uniform Money Services Act and on the basis of the
19 Findings of Fact, Conclusions of Law, and Respondent’s consent to the entry of this Order,
20 the Department hereby ORDERS:

21 1. Respondent shall pay a civil penalty under AS 06.55.605 in the amount of
22 \$4,440 plus \$750.00 to reimburse the Department for the costs of its investigations, for a total
23 of \$5,190.00. This amount was calculated at \$20.00 per day the main company customer
24 support number was inactive at 137 days, and \$20.00 per day the Primary Consumer

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Complaint (Regulator) Contact number was not updated for 85 days.

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

IT IS SO ORDERED.

JULIE SANDE, Commissioner
Department of Commerce, Community and
Economic Development

DATED: March 24, 2025

/s/ Robert H. Schmidt
BY: Robert H. Schmidt, Director
Division of Banking and Securities

1 **Consent to Entry of Order**

2 Neil Bergquist, Chief Executive Officer, as authorized representative of Coinme Inc.
3 (“Respondent”), acknowledges that he has read the foregoing Order and that he knows and
4 fully understands the Order contents; and that he is aware of the right to a hearing and appeal in
5 this matter and have waived the same.

6 Respondent admits to the jurisdiction of the Department of Commerce, Community
7 and Economic Development, Division of Banking and Securities (“Department”) and further
8 consents to entry of this Order by the Department as settlement of this Order. For purposes of
9 this Order, Respondent neither admits nor denies but consents to the Department’s findings
10 herein.

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

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

15
16 Date: 3/10/25

/s/ Neil Bergquist
Neil Bergquist
Chief Executive Officer
Coinme Inc.

17
18
19 SUBSCRIBED AND SWORN TO before me this 10 day of March, 2025.



20
21 /s/ Katie Aileen Olsen
(Signature of Notary Public)

22 Katie Aileen Olsen
Notary Printed Name
23 State of: Washington
24 Commission Expires: 06/10/2026

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