

Jim Burns

From: Jim Burns
Sent: Thursday, May 17, 2007 8:22 AM
To:
Subject: RE: Internet Remittances: Draft Language

Dear M

Thank you for your inquiry regarding the Idaho Money Transmitters Act.

As to your questions, we are of the view that internet-based fund transmittal platforms constitute a money transmission business and that such businesses may fall within the jurisdiction of the Idaho Money Transmitters Act (IMTA). More importantly, we are of the view that web-originated fund transmittals on behalf of Idaho residents or entities would invoke the licensing requirement of the IMTA. This licensing requirement would extend to both domestic or international firms that might conduct business on behalf of Idaho-based individuals or entities.

I trust that the above addresses the substance of your inquiry. Should you need additional clarification or have additional questions, please feel free to contact me directly at (208) 332-8080.

Regards,

Jim Burns
Investigations Chief
Idaho Dept. of Finance
Boise, ID
(208) 332-8080
Idaho Toll Free 1-888-346-3378

From:
Sent: Tuesday, May 15, 2007 12:10 PM
To: Finance Internet Mail
Subject: Internet Remittances

May 15, 2007

Idaho Department of Finance
800 Park Blvd., Suite 200
Boise, ID 83712

RE: INTERNET REMITTANCES

DEAR SIR/MADAM:

provides anti-money laundering and regulatory compliance services to money services businesses (MSBs) in the United States and other countries. The majority of our clients are licensed money transmitters.

Over the past year we have received an increased number of inquiries from our clients relating to providing remittance or money transfer services over the internet. Specifically, our clients have asked about the state requirements that need to be met in order

8/24/2007

to engage in such service.

In an effort to assist our clients and clarify the law in your state, we are asking that you provide us an answer to the following question and the follow-up:

DOES A MONEY TRANSMITTER, WHO DOES NOT HAVE A PHYSICAL LOCATION IN YOUR STATE, EITHER THROUGH BRANCHES OR AGENTS OR AUTHORIZED DELEGATES, REQUIRE A MONEY TRANSMITTER OR OTHER TYPE OF LICENSE IN YOUR STATE, IF IT PROVIDES REMITTANCE SERVICES SOLELY ON ITS WEBSITE THROUGH THE INTERNET?

DOES YOUR ANSWER TO THE ABOVE CHANGE IN ANY WAY IF THE MONEY TRANSMITTER IS A FOREIGN ENTITY OUTSIDE THE U.S.?

If you need additional information or clarification on our inquiry, please let us know.

We appreciate your assistance in this matter.

Cordially,

Compliance Consultant