## STATE OF CALIFORNIA BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY DEPARTMENT OF FINANCIAL PROTECTION INNOVATION

To: TranZlanta Financial Services, LLC 3527 Becket St. NE Lacey, WA 98516

## **CEASE AND DESIST ORDER**

(For violations of Financial Code section 2030)

The Commissioner of Financial Protection and Innovation (Commissioner) finds that:

- 1. At all relevant times, TranZlanta Financial Services, LLC (TranZlanta) is a limited liability company in the State of Washington with an address of 3527 Becket St. NE, Lacey, WA 98516.
- 2. TranZlanta is listed with the Nationwide Multistate Licensing System (NMLS) with NMLS ID 1156347, and in the past was licensed by the Washington Department of Financial Institution to engage in the business of money transmission in the state of Washington.
- 3. The Commissioner has jurisdiction over the licensing and regulation of persons and entities engaged in the business of money transmission in California under the Money Transmission Act (Fin. Code § 2000 *et seq.*).
- 4. The Money Transmission Act provides, "A person shall not engage in the business of money transmission in this state, or advertise, solicit, or hold itself out as providing money transmission in this state, unless the person is licensed or exempt from licensure . . . or is an agent of a person licensed or exempted from licensure." (Fin. Code § 2030(a); see Cal. Code Regs., Tit. 10 § 80.125.10.)
- 5. An "agent" of a licensee is a "person that is not itself licensed as a money transmitter in California and provides money transmission in California on behalf of the licensee, provided that the licensee becomes liable for the money transmission from the time money or monetary value is received by that person." (Fin. Code § 2003(b); see Cal. Code Regs., Tit. 10 § 80.126.)
- 6. "Money transmission" includes "[r]eceiving money for transmission." (Fin. Code § 2003(q).) "Receiving money for transmission," as defined by Financial Code section 2003,

subdivision (u), means actually or constructively receiving money "within or outside the United States by electronic or other means." (See Cal. Code Regs., Tit., 10 § 80.129.)

- 7. From at least April 1, 2019 to October 31, 2022 (The Relevant Period), TranZlanta, while licensed in the state of Washington, unlawfully engaged in the business of money transmission in California by transmitting money from numerous consumers in California to persons in the nation of Gambia and received fees for these transactions.
- 8. During The Relevant Period, TranZlanta maintained a website, <a href="www.tranzlanta.com">www.tranzlanta.com</a>, that stated "TranZlanta Financial Services is bonded, licensed and registered Money Transmitter company that provides flexible, convenient and secure money transfer from Washington State to The Gambia." Further, during The Relevant Period, the user agreement stated, "[t]he Service (referencing the User Agreement effective as of 7/24/2010) was created to help TranZlanta customers send money to family and friends in The Gambia."
- 9. TranZlanta has not at any time been issued a license by the Commissioner under the Money Transmission Act and is not authorized to engage in business as a money transmitter in California. TranZlanta is not exempt from the licensing requirement of Financial Code section 2030, subdivision (a).
  - 10. Financial Code section 567 provides:

If the Commissioner finds that a person has conducted, or that there is reasonable cause to believe that a person is about to conduct, business that requires a license issued by the commissioner and that person has not been issued the required license, the commissioner may, without any prior notice or hearing, order the person to cease and desist from conducting any unauthorized business unless and until the person is issued a license to engage in appropriate license business.

Based on the foregoing findings, the Commissioner is of the opinion that TranZlanta had engaged during The Relevant Period in the business of money transmission in California and advertised, solicited, or held itself out as providing money transmission in California without first obtaining a license or being an agent of a person licensed or exempted from licensure in violation of Financial Code section 2030, subdivision (a).

Accordingly, pursuant to Financial Code section 567, TranZlanta is hereby ordered to cease and desist from engaging in the business of money transmission in California, and advertising,

soliciting or holding itself out as providing money transmission in California, unless and until it obtains a license from the Commissioner or is an agent of a person licensed or exempt from licensure.

This Order is necessary, in the public interest, for the protection of consumers and consistent with the purposes, policies and provisions of the Money Transmission Act. This Order shall remain in full force and effect until further order of the Commissioner.

DATED: October 22, 2025 San Franciso, California KHALIL MOHSENI
Commissioner of Financial Protection and Innovation



By:

MARY ANN SMITH

Deputy Commissioner

Enforcement Division