

STATE OF CALIFORNIA

DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION

In the Matter of)
)
 WORLDREMIT CORP.,)
)
 Respondent)
)
 _____)

ORDER
(Fin. Code, § 2148)

Pursuant to Financial Code section 2148, the Commissioner of Financial Protection and Innovation (“Commissioner”) hereby orders:

1. Within one hundred-twenty (120) days of the date of this Order, WorldRemit Corp. (“Respondent”) shall enhance, implement, and maintain its Anti-Money Laundering (“AML”) program to ensure compliance with the effective AML program requirements in 31 CFR § 1020.210(a), including the following corrections:
 - a. Enhance transaction review processes and technological resources to reduce existing backlogs of transaction alerts and keep up with the newly generated cases;
 - b. Reassess its staffing needs and increase the in-house and/or outsourcing staff level if needed to reduce existing backlogs of transaction alerts and keep up with the newly generated cases;
 - c. Improve controls and dedicate adequate resources to ensure alerts and cases are reviewed and completed within a reasonable timeframe and expand the Suspicious Activity Report narrative to include the detection date;
 - d. Improve and update its transaction monitoring system, blacklist function, and Know-Your-Customer (“KYC”) process to detect and prevent illicit activity in a timely manner; and,
 - e. Enhance and update its KYC procedures and transaction data validation procedures to ensure the integrity of transaction data and accuracy of its reported transaction figures.
2. Within sixty (60) days of the date of this Order, Respondent shall develop, adopt, and implement policies and procedures to ensure compliance with the Money Services Business registration requirements in 31 CFR § 1022.380.

3. Within sixty (60) days of the date of this Order, Respondent shall develop, adopt, and implement policies and procedures to ensure that Respondent monitor and forecast the Average Daily Transmission Liability (“ADTL”) level and maintain adequate surety bond coverage, as required by California Financial Code section 2037, subdivision (e).
4. Within sixty (60) days of the date of this Order, Respondent shall develop, adopt, and implement policies and procedures to ensure that Respondent shall at all times own eligible securities having an aggregate market value computed in accordance with US GAAP of not less than the aggregate amount of all its outstanding money received for transmission, as required by California Financial Code section 2081, subdivision (a).
5. Within one hundred-twenty (120) days of the date of this Order, Respondent shall develop, adopt, and implement policies and procedures to maintain and report the proper Outstanding Transmission Liability (“OTL”) on call reports and financial statements. Respondent shall also conduct a study or survey on its clients and beneficiaries to determine actual payout timelines, making appropriate adjustments to its ADTL and OTL reporting based on the survey results.
6. Within ninety (90) days of the date of this Order, Respondent shall develop, adopt, and implement an accounting manual to include the following policies and procedures: bank reconciliation, accounts receivable, accounting treatment on bad debt write-off, and methodology for establishing allowance for doubtful accounts.
7. Within sixty (60) days of the date of this Order, Respondent shall prepare a detailed standalone financial budget for the current fiscal year. Respondent shall also continue to prepare a standalone financial budget on an annual basis.
8. Within one hundred-eighty (180) days of the date of this Order, Respondent shall develop, adopt, and implement the following policies and procedures:
 - a. Policies and procedures for continuation of Suspicious Activity Reports;
 - b. Source of Funds Policy to include when a transaction should be put on hold or account disabled;
 - c. Policies and procedures for remittances to Brazil; and,
 - d. Procedures for tracking independent review findings by management.
9. Within sixty (60) days of the date of this Order, Respondent shall provide to the Commissioner a detailed plan for addressing the violations and findings of the safety and soundness examination dated July 18, 2022.

EXHIBIT A

This Order is effective immediately as of the date set forth below. Violation of any provision of this Order will be deemed to be conducting business in an unsafe manner and will subject Respondent to further regulatory enforcement action. The Commissioner reserves the right to amend, revoke or rescind this Order, in whole or in part.

Date: October 28, 2022



Robert Venchiarutti
Deputy Commissioner
Department of Financial Protection and Innovation