

KATHY HOCHUL
Governor



ADRIENNE A. HARRIS
Superintendent

May 5, 2025

Hon. Brad Hoylman-Sigal
New York State Senate
Legislative Office Building, Room 310
Albany, NY 12247

Hon. Michah Lasher
New York State Assembly
Legislative Office Building, Room 534
Albany, NY 12248

Dear Senator Hoylman-Sigal and Assemblymember Lasher,

Thank you for your correspondence.

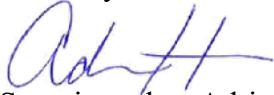
The New York State Department of Financial Services (DFS) takes seriously its mission “to build an equitable, transparent, and resilient financial system that benefits individuals and supports business.” DFS prides itself on its independent, professional, and data-driven approach in overseeing the financial services industry and protecting New York consumers.

DFS is considered one of the premier financial regulators in the world. The Department regulates the activities of over 3,000 financial institutions with nearly \$10 trillion in assets. This includes over 1,900 insurance companies with assets of more than \$6.4 trillion, including property and casualty insurance companies, life insurance companies, health insurers and managed care organizations, and pharmacy benefit managers. DFS also regulates more than 1,300 banks and financial institutions with assets totaling more than \$3.3 trillion, including 120 foreign banks and 15 Global Systemically Important Banks, credit unions, money services businesses, credit reporting agencies, and student loan servicers.

In regard to the issues raised in your May 5, 2025 letter, DFS thoroughly reviews all license applications and holds all applicants to identical robust standards. All applicants for a New York money transmitter license must demonstrate that they are prepared to comply with all applicable New York laws and regulations, including requirements regarding the safety and soundness of the institution, Bank Secrecy Act and Anti-Money Laundering policies, cybersecurity protocols, consumer protections, investment standards, surety bonds, and submit to criminal background checks of controlling parties, among other requirements.

In order to maintain credibility as an independent regulator in the financial capital of the world, DFS applies the same standards of review to every application, upholding the rule of law through the consistent and transparent application of rules. Failure to uphold these principles would not just be illegal but could harm consumers and destabilize our financial system. While we cannot comment on whether DFS has a pending application from X payments, I can assure you that DFS will continue to rigorously and fairly review any and all applications in a consistent and principled manner.

Sincerely,



Superintendent Adrienne A. Harris