

STATE OF NEBRASKA
Department of Banking & Finance

IN THE MATTER OF:	)	ORDER ADOPTING CERTIFICATION
	)	PROCEDURES FOR MONEY
Foreign Adversary Certification	)	TRANSMITTER LICENSEES AND
	)	APPLICANTS REGARDING
	)	FOREIGN ADVERSARY CONTROL

THIS MATTER comes before the Nebraska Department of Banking and Finance (“Department”), by and through its Director, pursuant to its authority under the Nebraska Money Transmitters Act, Neb. Rev. Stat. §§ 8-2701 to 8-2754 (Cum. Supp. 2024; Supp. 2025; LB 717, 2026; LB 838, 2026) (the “Act”);

1. Neb. Rev. Stat. § 8-2750(1)(a) (LB 838, 2026) provides that if an applicant or any key individual or person in control of the applicant fails to establish that such applicant, key individual, or person in control is not a foreign adversary person, as defined in the Act, the Director shall presume that the character and general fitness of such persons indicate that it is not in the interest of the public to permit the applicant to engage in money transmission.

2. Neb. Rev. Stat. § 8-2750(1)(c) (LB 838, 2026) provides that if a licensee or authorized delegate or any key individual or persons in control of a licensee or responsible person in control of the authorized delegate fails to establish that such licensee, authorized delegate, key individual, or person in control is not a foreign adversary person, as defined in the Act, the Director shall presume that the character and general fitness of such persons indicate that it is not in the interest of the public to permit such persons to provide money transmission services in Nebraska.

3. Neb. Rev. Stat. § 8-2751 LB 838, 2026) provides that the Director shall send a written request to each licensee and applicant that requests supplemental information necessary for the Director to investigate and determine compliance with Section 8-2750 and its related provisions.

4. Neb. Rev. Stat. § 8-2751 further provides that for any licensee that fails to provide such requested information within sixty days after receipt of such request or that the Director has reasonable suspicion to believe is a foreign adversary person or has any key individual or person in control that is a foreign adversary person, the Director shall institute proceedings to revoke such licensee's Money Transmitter license.

5. Neb. Rev. Stat. § 8-2751 requires the Director to prescribe forms and instructions and to issue an order governing applications under the Act to require information sufficient to show that the applicant is not a foreign adversary person.

IT IS THEREFORE ORDERED as follows:

1. The Department has developed a Certification Form for use in requesting information sufficient to demonstrate that a licensee, applicant, and any related key individuals or persons in control are not foreign adversary persons. Such form is available on the Department's website or will be made available upon request. Such form may be updated from time to time by the Department.

2. Existing Money Transmitter licensees are required to complete this Certification Form within sixty (60) days of receipt from the Department, and to upload such completed form into the licensee's Nationwide Multistate Licensing System ("NMLS") record.

3. Applicants with a pending Money Transmitter License application are required to complete this Certification Form and to upload such completed form into the applicant's NMLS record before such pending application will be reviewed in full for a licensing determination.

4. This Order shall remain in effect until subsequently modified or vacated by Order of the Director.

5. The effective date of this Order shall be the date of the Director's signature.

DATED this 30th day of July, 2026.



**STATE OF NEBRASKA
DEPARTMENT OF BANKING AND FINANCE**

DocuSigned by:
By: Kelly Lammers
Kelly Lammers, Director

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