

**STATE OF VERMONT
DEPARTMENT OF FINANCIAL REGULATION**

IN RE:)	
)	
CSG FORTE PAYMENTS, INC)	DOCKET NO. 21-055-B
NMLS # 1986669)	

STIPULATION AND CONSENT ORDER

The Vermont Department of Financial Regulation (the “Department”) and CSG Forte Payments, Inc. (“Respondent”) hereby stipulate and agree as follows:

1. Pursuant to 8 V.S.A. Chapters 1, 72, and 79, the Commissioner of the Vermont Department of Financial Regulation is charged with administering and enforcing Vermont law as it pertains to money transmitters in the State of Vermont.

2. Respondent is a Delaware corporation with a principal place of business at 500 W Bethany Drive, Suite 200, Allen, TX 75013.

3. Respondent is not currently, nor has it ever been, licensed to engage in the business of money transmission in Vermont.

4. Respondent acknowledges and admits the jurisdiction of the Commissioner over the subject matter of this Stipulation and Consent Order set forth herein.

5. Respondent operates a payments platform for merchants and engages in various payment processing activities.

6. Respondent was formed when CSG Systems International, Inc. acquired Forte Payment Systems, Inc. in October of 2018. Forte Payment Systems, Inc. began operating in Vermont in 2001 and did not hold a Vermont money transmitter license.

7. Following the acquisition, Respondent evaluated current and potential future business activities and determined that certain activities may require a Vermont Money Transmitter license.

8. On June 29, 2020, Respondent submitted an application through the Nationwide Multistate Licensing System (“NMLS”) to obtain a Vermont money transmitter license.

9. Vermont’s Money Services Act, 8 V.S.A. Chapter 79 defines “money transmission” to include “receiving money or monetary value for transmission to a location within or outside the United States.” 8 V.S.A. § 2500(11).

10. The Department asserts that prior to obtaining a Vermont money transmitter license, Respondent engaged in the business of money transmission in Vermont without the license or the authorization required by 8 V.S.A. Chapter 79 by effectuating certain payment processing and payroll services.

11. Respondent certifies that it provided complete and accurate data on its activity in Vermont prior to licensure since 2013 (the earliest date Respondent had access to transaction data), including number of transactions, volume of transactions, and fees earned from said transactions.

12. Respondent acknowledges that the Department is relying upon its representations and warranties in making its determinations in this matter.

13. At all times, Respondent has cooperated with the Department.

14. As part of this Stipulation and Consent Order, Respondent neither admits nor denies the Department’s allegation that Respondent violated Vermont’s money transmission laws.

15. The Department has not received any complaints stemming from Respondent’s Vermont activity.

16. The parties wish to resolve this matter without administrative or judicial proceedings.

17. Respondent and the Department expressly agree to enter into this Stipulation and Consent Order in full and complete resolution of the alleged violations described herein.

18. Respondent agrees to pay an administrative penalty of \$22,650 to the Department of Financial Regulation. The penalty was calculated based on licensing fees Respondent would have paid if properly licensed during the period of time Respondent conducted business in Vermont and the partial disgorgement of fees earned during the period of unlicensed activity. This shall be paid within ten (10) days of the execution of this Stipulation and Consent Order.

19. Respondent shall not, either directly or through its affiliates, engage in the business of money transmission in Vermont without a Vermont money transmitter license.

20. The Department acknowledges that the license application of Respondent is complete and all requirements for licensure are met except the resolution of this matter. The parties enter into this Stipulation and Consent Order to resolve this matter, therefore, upon execution of this Stipulation and Consent Order and payment by Respondent of the \$22,650 described in paragraph 18, such license shall issue and be deemed effective as of the date this Stipulation and Consent Order becomes effective.

21. This Stipulation and Consent Order shall not prevent any person from pursuing any claim he or she may have against Respondent, nor shall it be understood as determining whether any such claim may or may not exist in law or equity. Nothing contained herein shall be deemed an admission by Respondent.

22. Nothing contained in this Stipulation and Consent Order shall restrain or limit the Department in responding to and addressing any complaint filed with the Department involving

Respondent and the Department reserves the right to pursue restitution in connection with any complaint filed with the Department.

23. The Department and Respondent are entering into this Stipulation and Consent Order to settle a dispute between them, and all agree that this Stipulation and Consent Order does not constitute an adjudication of a violation of statute or regulation.

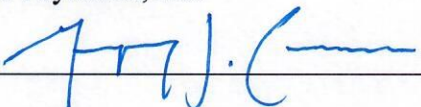
24. Respondent hereby waives its statutory right to notice and a hearing before the Commissioner of the Department, or his designated appointee, regarding this matter.

25. Respondent acknowledges and agrees that this stipulation is entered into freely and voluntarily and that except as set forth herein, no promise was made to induce the Respondent to enter into it. Respondent acknowledges its understanding of and agrees to all terms, conditions, and obligations contained in this Stipulation and Consent Order.

26. The terms set forth in this Stipulation and Consent Order represent the complete agreement between the parties as to its subject matter.

27. The undersigned representative of Respondent affirms that he or she has taken all necessary steps to obtain the authority to bind Respondent to the obligations stated herein and has the authority to bind Respondent to the obligations stated herein.

CSG Forte Payments, Inc.

By:  Date: 12/17/21

Print name & title:

Gregory L. Cannon Director + Secretary

ACCEPTED BY:

Molly Dillon 12/23/21
Molly Dillon, Deputy Commissioner Date
Banking Division, Vermont Department of Financial Regulation

CONSENT ORDER

1. The stipulated facts, terms, and provisions of the Stipulation are incorporated by reference herein.
2. Jurisdiction in this matter is established pursuant to Chapters 1, 72 and 79 of Title 8.
3. Pursuant to the Stipulation, CSG Forte Payments Inc. consents to the entry of this Consent Order.
4. CSG Forte Payments Inc. shall comply with all agreements, stipulations, and undertakings as recited above.

Dated at Montpelier, Vermont this 27th day of December 2021.



Michael S. Pieciak, Commissioner
Vermont Department of Financial Regulation