ORDER SUMMARY

Consumer Services Division Case Number C-26-4362

Statements of Charges *allege wrongdoing by a company or individual. DFI issues Statements of Charges to tell the company or individual:*

- *They have been investigated*
- *DFI is making allegations against them*
- *What the allegations are*
- *What consequences could follow*

DFI informs the company or individual of their rights at this time. The company or individual can respond to the Charges. They also have the right to contest the Charges at an administrative hearing.

Table 1 Identifying information about the action

Respondent Names	Order Number	Date Issued
Digital Access, LLC, NMLS #2185177 Christina C. Habhab, NMLS #2301318	C-26-4362-26-SC01	October 15, 2026

Need more information?

You can contact the Consumer Services Division, Enforcement unit at (360) 902-8703 or csenforcecomplaints@dfi.wa.gov. Please remember that we cannot provide financial or legal advice to members of the public. We also cannot release confidential information.

STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
DIVISION OF CONSUMER SERVICES

IN THE MATTER OF DETERMINING Whether there has been a violation of the Uniform Money Services Act of Washington by: DIGITAL ACCESS, LLC, NMLS #2185177, CHRISTINA C. HABHAB, Compliance Director and Responsible Individual, NMLS #2301318, Respondents.	No.: C-26-4362-26-SC01 STATEMENT OF CHARGES and NOTICE OF INTENT TO ENTER AN ORDER TO REVOKE LICENSE, PROHIBIT FROM INDUSTRY, REQUIRE AFFIRMATIVE ACTION, IMPOSE FINE, and COLLECT INVESTIGATION FEE

INTRODUCTION

Pursuant to RCW 19.230.130 and RCW 19.230.310, the Director of the Department of Financial Institutions of the State of Washington (Director) is responsible for the administration of chapter 19.230 RCW, the Uniform Money Services Act (Act). After having conducted an investigation pursuant to RCW 19.230.130 and WAC 208-690-180, and based upon the facts available as of the date of this Statement of Charges, the Director, through his designee, Consumer Services Division Acting Director Brian J. Guerard, institutes this proceeding and finds as follows:

I. FACTUAL ALLEGATIONS

1.1 Respondents.

A. Digital Access, LLC (Respondent Digital) was licensed by the Department of Financial Institutions of the State of Washington (Department) to conduct the business of a money transmitter and currency exchanger on or about June 9, 2022, and continues to be licensed to date.

B. Christina C. Habhab (Respondent Habhab) is the Compliance Director and Responsible Individual of Respondent Digital.

1.2 2023 Examination. From December 11, 2023, to December 19, 2023, the Department

conducted an examination of Respondent Digital's business practices for the period of June 9, 2022, through September 30, 2023. Respondent Digital was cited for several violations of the Act.

1.3 2025 Examination. From January 12, 2026, to January 29, 2026, the Department conducted an examination of Respondent Digital's business practices for the period of January 1, 2023, through December 31, 2025. Respondent Digital was cited for numerous violations of the Act, which included those set forth below.

1.4 Prohibited Acts. Between about January 1, 2023, and December 31, 2025, Respondent Digital and Respondent Habhab (Respondents) engaged in an unfair and deceptive act or practice by charging consumers a markup of up to 31% of the fair market value of the digital asset per transaction. Also, between about July 4, 2025, and July 21, 2025, Respondents charged a 45% markup on Litecoin transactions due to a manual input error. Finally, between about January 1, 2023, and December 31, 2025, the total value of the consumer transactions referenced above was approximately $4,782,497.00 USD, out of which Respondent was paid approximately $1,014,671.53 USD in total markups.

1.5 Required Virtual Currency Disclosures. Between about January 1, 2023, to December 31, 2025, Respondents did not provide the required disclosures for virtual currency transactions separately from other disclosures, as required. This is a repeat finding from the 2023 Examination. Additionally, Respondent did not clearly and conspicuously disclose how the markup charges referenced in Paragraph 1.4 would be calculated, as required.

1.6 Inadequate Anti-Money Laundering Program. Between about January 1, 2023, and December 31, 2025, Respondents did not establish and/or utilize adequate policies, procedures, and internal controls to comply with Anti-Money Laundering (AML) and Bank Secrecy Act (BSA) requirements. This was a repeat violation from the 2023 Examination. These deficiencies created an

environment of non-compliance with AML and BSA laws, and did not provide appropriate risk-based controls to adequately protect elderly consumers including:

A. Insufficient Know Your Customer Policies and Procedures. Respondents' Know Your Customer (KYC) controls had deficiencies for customer due diligence and identification. For example, the transaction databases showed data integrity issues with the customer verification system, which allowed customers to complete transactions without capturing accurate information about their identity and allowed at least two customers to conduct transactions under fictitious names.

B. Insufficient Enhanced Due Diligence Policies and Procedures. Respondents' Enhanced Due Diligence (EDD) procedures were lacking or insufficient by not requiring source of funds verification unless the consumer met certain restrictions.

C. Transaction Monitoring. Respondents did not sufficiently monitor transactions, due to not using blockchain transaction monitoring beyond screening consumers' direct wallet in each transaction and did not have the protocols in place to trigger alerts for consumers who sent funds to multiple different wallet addresses.

1.7 Inadequate Funds Transfer Recordkeeping. Between about January 1, 2023, to December 31, 2025, Respondents collected but did not remit, send, or provide proof of remittance of the required information under 31 C.F.R. § 1010.410(e) and (f) to any Virtual Asset Service Provider or receiving financial institution for review, with respect to every eligible transmittal of funds. This was a repeat finding from the 2023 Examination.

1.8 Permissible Investment Reports. Between about January 1, 2023, and December 31, 2025, Respondents incorrectly filed their monthly permissible investment reports by not including calculations of the average daily transmission liability. This was a repeat violation from the 2023 Examination.

1.9 Refunds Policy. Between about January 1, 2023, and December 31, 2025, Respondents did not have or provide to the Department, a refunds policy that complies with RCW 19.230.330(3).

1.10 Failed to Report Adverse Actions.

A. Between about August 13, 2022, and September 17, 2024, Respondents did not timely report an adverse action to the Department through the National Multistate Licensing System & Registry (NMLS), regarding a Consent Order filed with the Alabama State Banking Department.

B. On October 29, 2025, Respondents entered into a Consent Order with the Minnesota Department of Commerce. As of the date of this Statement of Charges, Respondents have not reported the Consent Order to the Department through the NMLS.

1.11 Failed to Timely Report Material Changes.

A. Between about March 6, 2025, and May 27, 2026, Respondents did not timely report to the Department that Respondents opened a business bank account.

B. On or about April 29, 2020, Respondents hired a Chief Operating Officer. Respondents did not report this to the Department until December 12, 2023.

1.12 Currency Transaction Report Recordkeeping. Between about January 1, 2023, and December 31, 2025, Respondents did not maintain records of at least one Currency Transaction Report filed.

1.13 Unclaimed Property Policies and Procedures. Between about January 1, 2023, and December 31, 2025, Respondents had inadequate unclaimed property policies and procedures because Respondents charged a 10% monthly fee on any unclaimed funds held as part of uncompleted transactions.

1.14 Inaccurate Annual Assessment Report. On or about July 1, 2024, Respondents did not file an accurate 2023 Annual Assessment Report, because the report contained inaccurate reported money transmission volume compared to the Money Services Business Call Reports for 2023.

1.15 Records Disposal Policy. Between about January 1, 2023, and December 31, 2025, Respondents did not have or provide to the Department, an adequate records disposal policy that

outlines the destruction or deletion of physical and digital records. This was a repeat finding from the 2023 Examination.

1.16 Ongoing Investigation. The Department's investigation of the alleged violations of the Act by Respondents continues to date.

II. GROUNDS FOR ENTRY OF ORDER

2.1 Prohibited Practices. Based on the Factual Allegations set forth in Section 1.4 above, Respondents are in apparent violation of RCW 19.230.340(1) and (2) by directly or indirectly employing any scheme, device, or artifice to defraud or mislead any person, and by directly or indirectly engaging in any unfair or deceptive act or practice toward any person, including but not limited to any false or deceptive statement about fees or other terms of a money transmission or currency exchange, by charging excessive markups for transactions.

2.2 Virtual Currency Disclosures. Based on the Factual Allegations set forth in Section 1.5 above, Respondents are in apparent violation of RCW 19.230.370 and WAC 208-690-205(3) for not providing required virtual currency disclosures separately from any other information provided to its customers and in a clear and conspicuous manner.

2.3 Inadequate Anti-Money Laundering Program. Based on the Factual Allegations set forth in Section 1.6 above, Respondents are in apparent violation of RCW 19.230.340(2), RCW 19.230.180, WAC 208-690-210, and 31 C.F.R. § 1022.210 for not developing, implementing, and maintaining an effective anti-money laundering program.

2.4 Funds Transfer Records Requirement. Based on the Factual Allegations set forth in Section 1.7 above, Respondents are in apparent violation of, RCW 19.230.180, WAC 208-690-075, WAC 208-690-210, and 31 C.F.R. § 1010.410(f) for not properly remitting required customer information with respect to a transmittal of funds of $3,000 or more.

2.5 Permissible Investment Report. Based on the Factual Allegations set forth in Section 1.8 above, Respondents are in apparent violation of RCW 19.230.170 and WAC 208-690-085(3) by not providing accurate monthly permissible investment reports.

2.6 Refunds Policy. Based on the Factual Allegations set forth in Section 1.9 above, Respondents are in apparent violation of RCW 19.230.170 and RCW 19.230.330(3) for not developing, implementing, and maintaining a refunds policy and for not refunding consumers within 10 days.

2.7 Adverse Actions. Based on the Factual Allegations set forth in Section 1.10 above, Respondents are in apparent violation of RCW 19.230.150 and RCW 19.230.340(8) by failing to make any report or statement lawfully required by the Director.

2.8 Requirement to Timely Report Material Changes. Based on the Factual Allegations set forth in Section 1.11 above, Respondents are in apparent violation of RCW 19.230.150(1) and WAC 208-690-110 for failing to report material changes within 30 business days.

2.9 Requirement to File Currency Transaction Reports. Based on the Factual Allegations set forth in Section 1.12 above, Respondents are in apparent violation of RCW 19.230.170, RCW 19.230.180, WAC 208-690-075(1), WAC 208-690-210, and 31 C.F.R. § 1010.306(a)(2) for not maintaining records of currency transaction reports.

2.10 Unclaimed Property Policies and Procedures. Based on the Factual Allegations set forth in Section 1.13 above, Respondents are in apparent violation of RCW 19.230.340(2) and (3), WAC 208-690-210, and RCW 63.30.330 by not having adequate unclaimed property policies and procedures.

2.11 Requirement to Accurately File Annual Report. Based on the Factual Allegations set forth in Section 1.14 above, Respondents are in apparent violation of RCW 19.230.110(1), WAC 208-690-090, WAC 208-690-100, and WAC 208-690-103 for failing to accurately file the 2023 annual assessment report.

2.12 Records Disposal Policy. Based on the Factual Allegations set forth in Section 1.15 above, Respondents are in apparent violation of RCW 19.230.170 and WAC 208-690-125 for not developing, implementing, and maintaining a records disposal policy.

III. AUTHORITY TO IMPOSE SANCTIONS

3.1 Liability for Conduct of Others. Pursuant to RCW 19.230.280, a licensee is liable for any conduct violating this chapter or rules adopted under the Act committed by employees of the licensee. The responsible individual is responsible under the license and may be subjected to administrative sanctions for any violations of the Act or rules adopted under the Act committed by the licensee or, if the responsible individual commits willful misconduct in supervising an authorized delegate or willfully avoids knowledge of an authorized delegate's business activities, violations committed by the licensee's authorized delegates.

3.2 Authority to Revoke License. Pursuant to RCW 19.230.230(1), the Director may issue an order to suspend, revoke, or condition a license if: (a) the licensee violates the Act or a rule adopted or an order issued under the Act; (e) the financial condition and responsibility, competence, experience, character, or general fitness of the licensee or responsible individual of the licensee indicates that it is not in the public interest to permit the person to provide money services; or (f) the licensee engages in an unsafe or unsound practice, or an unfair and deceptive act or practice.

3.3 Authority to Remove from Office or Prohibit from Industry. Pursuant to RCW 19.230.230(1), the Director may issue an order to remove from office or prohibit from participation in the affairs of any authorized delegate or any licensee, or both, any responsible individual, executive officer, person in control, or employee of the licensee if: (a) the licensee violates the Act or a rule adopted or an order issued under the Act; (e) the financial condition and responsibility, competence, experience, character, or general fitness of the licensee or responsible individual of the licensee indicates that it is not in the public interest to permit the person to provide money services;

or (f) the licensee engages in an unsafe or unsound practice, or an unfair and deceptive act or practice.

3.4 Authority to Require Affirmative Actions. Pursuant to RCW 19.230.230(1), the Director may issue an order to require affirmative actions as are necessary by a licensee to comply with the Act or rules adopted under the Act if: (a) the licensee violates the Act or a rule adopted or an order issued under the Act; (e) the financial condition and responsibility, competence, experience, character, or general fitness of the licensee or responsible individual of the licensee indicates that it is not in the public interest to permit the person to provide money services; or (f) the licensee engages in an unsafe or unsound practice, or an unfair and deceptive act or practice.

3.5 Authority to Impose Fine and Costs. Pursuant to RCW 19.230.290, the director may assess a civil penalty against a licensee, responsible individual, or other person that violates the Act or an order issued under the Act, in an amount not to exceed $100 per day for each day the violation is outstanding, plus this state's costs and expenses for the investigation and prosecution of the matter, including reasonable attorneys' fees.

3.6 Authority to Collect Investigation Fee. Pursuant to RCW 19.230.130(2), RCW 19.230.290, RCW 19.230.320(1)(c) and (2), WAC 208-690-170, and WAC 208-690-180(3), the Department may collect the costs of investigations. The fee will be calculated at the rate of $75 per hour.

IV. NOTICE OF INTENT TO ENTER ORDER

Respondents' violations of the provisions of chapter 19.230 RCW and chapter 208-690 WAC, as set forth in the above Factual Allegations, Grounds for Entry of Order, and Authority to Impose Sanctions, constitute a basis for the entry of an Order under RCW 19.230.230, RCW 19.230.250, and RCW 19.230.340. Therefore, it is the Director's intent to ORDER that:

4.1 Respondent Digital Access LLC's money transmitter/currency exchanger license be revoked;

4.2 Respondent Digital Access LLC be prohibited from participation in the conduct of the affairs of any money transmitter/currency exchanger subject to licensing by the Department, or any authorized delegate, or both, for a period of ten years;

4.3 Respondent Christina C. Habhab be prohibited from participation in the conduct of the affairs of any money transmitter/currency exchanger subject to licensing by the Department, or any authorized delegate, or both, for a period of ten years;

4.4 Respondents Digital Access LLC and Christina C. Habhab engage in the following affirmative actions:

a. Audit all existing Washington customers and provide to the Department proof that each Washington customer meets the requirements for Know Your Customer and Enhanced Due Diligence, regardless of the Washington customer's tier.

b. Respondents shall make the following refunds and disgorgements.

i. For all Washington Customers with transactions from January 1, 2023, to present, with a proven KYC and EDD, Respondents shall refund all fees and markups.

ii. For all other Washington Customers with transactions from January 1, 2023, to present, without a proven KYC and EDD, Respondents shall disgorge by paying to the Department of Financial Institutions all fees and markups received from the transactions.

c. Respondents shall send all refunds using a mail service that includes tracking and confirmation of delivery and shall send a letter with each refund that states: "Following an order from the Washington State Department of Financial Institutions it has been determined that you are entitled to a refund in the amount of [insert payment amount] that includes a refund of [insert details of refund accounting]. If you have questions, please contact [insert contact information]."

d. Respondents shall provide the Department with written proof regarding the refunds, which at a minimum, shall include:

i. A copy of the refund checks and letters,

ii. Proof that the checks were mailed to each of Washington Customer, and

iii. Written proof of receipt by the Washington Customer of the refund checks, including copies of the front and back of the deposited checks to the extent that the checks are received and negotiated by their payees.

If after making reasonable efforts to re-deliver, any refund checks that still cannot confirmed delivered, Respondents shall escheat the applicable amount to the State of Washington Department of Revenue as unclaimed property pursuant to all rules and timelines of the unclaimed property program. Respondents shall provide the Department with proof of any refunds submitted to the unclaimed property program.

4.5 Respondents Digital Access LLC and Christina C. Habhab jointly and severally pay a fine which as of the date of these charges totals $ 1,006,175.00;

4.6 Respondents Digital Access LLC and Christina C. Habhab jointly and severally pay an investigation fee which as of the date of these charges totals $1,830.00;

4.7 Respondent Digital Access LLC maintain records in compliance with the Act and provide the Department with the location of the books, records, and other information

relating to Respondent Digital Access LLC's money transmitter and currency exchanger business, and the name, address, and telephone number of the individual responsible for maintenance of such records in compliance with the Act; and

4.8 Respondents Digital Access LLC and Chrsitina C. Habhab jointly and severally pay the Department's costs and expenses for prosecuting violations of the Act in an amount to be determined at hearing or by declaration with supporting documentation in event of default by any Respondent.

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V. AUTHORITY AND PROCEDURE

This Statement of Charges and Notice of Intent to Enter an Order to Revoke License, Prohibit From Industry, Require Affirmative Actions, Impose Fine, Collect Investigation Fee, and Recover Costs and Expenses (Statement of Charges) is entered pursuant to the provisions of RCW 19.230.220 and RCW 19.230.310, and is subject to the provisions of chapter 34.05 RCW (the Administrative Procedure Act). Respondents may make a written request for a hearing as set forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR HEARING accompanying this Statement of Charges

Dated this 15th day of October 2026.

__/s/_____
BRIAN J. GUERARD, Acting Director
Division of Consumer Services
Department of Financial Institutions

Presented by:

__/s/_____
CHRISTOPHER FOREMAN
Financial Legal Examiner

__/s/_____
MEGAN GUTHRIE
Financial Legal Examiner

Approved by:

__/s/_____
KENDALL FREED
Enforcement Chief