



COMMONWEALTH OF KENTUCKY
PUBLIC PROTECTION CABINET
DEPARTMENT OF FINANCIAL INSTITUTIONS
ADMINISTRATIVE AGENCY CASE NO. 2025-DFI-0203

DEPARTMENT OF FINANCIAL INSTITUTIONS

COMPLAINANT

v.

PAYCHEX HOLDINGS, LLC

RESPONDENT

AGREED ORDER

STATEMENT OF FACTS

1. The Department of Financial Institutions (“DFI”) is responsible for regulating and licensing entities engaged in the business of money transmission services with the provisions set forth in Kentucky Revised Statutes (KRS) Chapter 286.11.

2. Paychex Holdings, LLC (“Respondent”) is authorized to do business in Kentucky as a money transmitter business pursuant to KRS Chapter 286.11 with License No. SC829730. Respondent has a corporate address of 911 Panorama Trail South, Rochester, New York 14625.

3. On April 29, 2024, Respondent applied for a money transmitter license with the Commonwealth of Kentucky which was granted on May 29, 2024.

4. During the licensure process Paychex disclosed that it had already been engaged in money transmission in Kentucky since 2019, with 2,320,012 transactions for a total of \$8,792,492,660.09.

STATUTORY AUTHORITY

5. KRS 286.11-005 (1) states “[o]n or after October 1, 2006, no person shall engage in the business of money transmission without a license, or without being the agent of a licensee, as provided in this subtitle.”

6. KRS 286.11-003(17) defines money transmission as “engaging in the business of receiving money or monetary value to transmit, deliver, or instruct to be transmitted or delivered, money or monetary value to another location inside or outside the United States by any and all means...”

VIOLATIONS

7. Respondent completed 2,320,012 money transmission transactions for a total of \$8,792,492,660.09 prior to obtaining a money transmission license in Kentucky in violation of KRS 286.11-005.

AGREEMENT AND ORDER

8. Respondent neither admits nor denies violating any provision of KRS 286.11 or any regulations promulgated thereunder.

9. To resolve this matter without litigation or other adversarial proceedings, DFI and Respondent agree to compromise and settle all claims arising from the above-referenced factual background in accordance with the terms set forth herein.

10. In the interest of economically and efficiently resolving the violation described herein, DFI and Respondent agree as follows:

- a. Respondent agrees to pay a civil penalty assessment in the amount of forty-thousand dollars (\$40,000) for the violations described herein, which shall be payable immediately upon entry of this Order;
- b. All payments shall be made electronically through the NMLS system;
- c. Respondent shall cease and desist from any future violations of the Kentucky Financial Services Code;

d. Respondent agrees to take appropriate remedial actions including supervision and training to avoid future violations of the Kentucky Financial Services Code;

e. Respondent waives its right to demand a hearing at which it would be entitled to legal representation, to confront and cross-examine witnesses, and to present evidence on its own behalf, or to otherwise appeal or set aside this Order;


f. Respondent consents to and acknowledges the jurisdiction of DFI over this matter and that this Agreed Order is a matter of public record and may be disseminated as such;

g. In consideration of execution of this Agreed Order, Respondent hereby releases and forever discharges the Commonwealth of Kentucky, The Department of Financial Institutions, Office of Legal Services, and each of their members, agents, and employees in their individual capacities, from any and all manner of actions, causes of action, suits, debts, judgments, excutions, claims and demands whatsoever, known and unknown, in law or equity, that Respondent ever had, now has, may have or claim to have against any or all of the persons or entities named in this paragraph arising out of or by reason of this investigation, this disciplinary action, this settlement or its administration;

h. By signing below, Respondent acknowledges it has read the foregoing Agreed Order and is aware of and fully understands its contents; and

i. This Agreed Order shall constitute the Final Order in this matter.

SO ORDERED on this the 6th day of April, 2026.


MARNIROCK GIBSON,
COMMISSIONER

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Agreed Order was sent on this the 6
day of April, 2026, by certified mail and email, return receipt requested, to:

Frank Fiorille
Vice President, Risk, Compliance, and Data Analytics
Paychex Holdings, LLC
Paychex Holdings, LLC
220 Kenneth Drive
Rochester, NY 14623

NMLSCompliance@paychex.com

Via hand-delivery to:

Gary A. Stephens
Department of Financial Institutions
500 Mero Street 2SW19
Frankfort, Kentucky 40601

Kentucky Department of Financial Institutions

Name: Allison Reedy Victoria Ward-Bishop

Title: Executive Staff Adviser