



**Enforcement, Innovation and Regulatory Policy Division**  
**Arizona Department of Insurance and Financial Institutions**  
100 North 15<sup>th</sup> Avenue, Suite 261, Phoenix, AZ 85007-2630  
Phone: (602) 364-3100 | Web: <https://difi.az.gov>

**Douglas A. Ducey, Governor**  
**Evan G. Daniels, Director**

VIA EMAIL: [tom@hourly.io](mailto:tom@hourly.io)

June 9, 2022

RE: Hourly Inc.'s Request for License Determination in Arizona

Dear Mr. Sagi:

The Arizona Department of Insurance and Financial Institutions ("Department") hereby responds to your April 12, 2022 letter in which you requested the Department's determination on whether providing payroll services in Arizona requires a money transmitter license pursuant to A.R.S. §§ 6-1201 *et seq.* The Department appreciates your proactive approach and offers its position below.

Based on the facts you have presented, the Department has determined that Hourly Inc.'s business model, as described in your letter, does not require a money transmitter license. The Department's position is strictly based on your representations and the Department has not independently verified the facts in your letter. The Department reserves the right to change its determination if it becomes aware of additional facts and circumstances surrounding Hourly's business practices in Arizona.

Please be advised that the Department may, in the future, issue a Substantive Policy Statement that may address and/or supersede one or more of the determinations herein. It is your responsibility to inform the Department of any substantive changes to your business operations prior to their implementation in order to ensure continued compliance with Arizona law.

Best Regards,

Deian Ousounov

A handwritten signature in cursive script that reads "Deian Ousounov".

Assistant Director  
Arizona Department of Insurance and Financial Institutions

CC:  
Tammy Seto, Assistant Director