



Florida's New Virtual Currency Kiosk Law

What CS/HB 505 Means for Crypto-ATM Operators and Money Services Businesses

CS/HB 505 (2026) | Creating Part V of Chapter 560, Florida Statutes

Effective January 1, 2027 (registration requirement effective March 1, 2027)

June 15, 2026

STATUS: PASSED BY THE LEGISLATURE — AWAITING THE GOVERNOR'S SIGNATURE

This bill is **not yet law**. It passed both chambers of the Florida Legislature unanimously and was enrolled on March 12, 2026; as of this writing the Governor's action remains pending. Because it cleared the House and Senate without a single dissenting vote, it is **very likely to be signed and to take effect on January 1, 2027**. Operators should prepare now. See "Status of This Legislation" on page 3.

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Introduction

If you own or operate a cryptocurrency kiosk — the ATM-like machines that let customers buy or exchange virtual currency — or if you are a money services business whose locations host one, Florida is about to regulate you directly for the first time. **CS/HB 505**, titled "Virtual Currency Kiosks," creates a new registration regime and a set of consumer-protection rules aimed squarely at the fraud that has flowed through these machines.¹

The bill does something Florida law has never done: it names virtual currency kiosk businesses as a category of money services business, brings them under the Office of Financial Regulation (OFR), and imposes daily transaction caps, mandatory fraud warnings, detailed receipts, and a refund right for first-time fraud victims. It does all of this by creating a brand-new **Part V of Chapter 560, Florida Statutes** — the Money Services Businesses code that AML Consulting Solutions clients already know well.²

This guide explains what the bill requires, who it covers, the deadlines that matter, and the steps operators should take now. One point comes first, because it frames everything else: this is not yet law.

Status of This Legislation

As of the date of this publication, CS/HB 505 has **passed both chambers of the Florida Legislature but has not yet been signed by the Governor**. The bill was enrolled — the final step before transmittal to the Governor — on March 12, 2026, and the official record lists the Governor's action as "Pending."³

Why we expect this to become law

CS/HB 505 moved through the Legislature with **no recorded opposition at any stage**. The House passed it 108–0, the Senate passed it 37–0, and the House agreed to the final version 107–0. Its Senate companion (CS/CS/SB 198) cleared its three committees 10–0, 9–0, and 24–0 before the Senate deferred to the House bill. Legislation this uncontested is rarely vetoed.⁴

Our assessment: there is a strong probability the Governor signs CS/HB 505 and that it takes effect as written on **January 1, 2027**, with the registration prohibition beginning **March 1, 2027**. We recommend treating it as a near-certain compliance obligation and preparing accordingly — while recognizing that, until it is signed, its terms could still change or, in the unlikely event of a veto, not take effect at all.

We will update this publication once the Governor acts and a chapter-law number is assigned. The remainder of this guide describes the bill as enrolled.

Background: The Problem the Bill Addresses

What a Virtual Currency Kiosk Is

A virtual currency kiosk is a physical, ATM-like machine that lets a user buy or exchange virtual currency such as Bitcoin. The customer enters the address of the virtual wallet that will receive the purchased currency — often their own, but sometimes a third party's — usually by scanning a QR code, and then inserts cash or a debit or credit card to complete the transaction. Kiosks earn revenue through fees and are typically placed in convenience stores, gas stations, cafés, and supermarkets.⁵

The footprint in Florida is substantial. As of December 2025, there were reportedly **37 operators running roughly 3,150 kiosks** across the state.⁶

The Fraud Problem in Florida

These machines have become a favored tool for scammers, who direct victims — often elderly — to feed cash into a kiosk under the guise of paying a "government agent," a "bill collector," or law enforcement. According to OFR, the FBI and the Federal Trade Commission received Florida-based complaints involving virtual currency kiosk fraud totaling **well over \$33 million in alleged victim losses between January 2020 and December 2025**.⁷ That toll is the engine behind CS/HB 505, and it explains why the bill's centerpiece is consumer protection rather than revenue or licensing.

The Regulatory Gap Under Current Law

Under existing law, Florida has **no separate regulatory regime for virtual currency kiosk businesses**. Whether a kiosk operator is regulated at all depends on how it transacts:

- If the kiosk conducts only direct, peer-to-peer sales — selling virtual currency from its own inventory directly to the customer with no third party — it is **not** required to be licensed under current Florida law.
- If the kiosk acts as an **intermediary** — facilitating the transmission of funds to a third party — it may be a money transmitter, which makes it a money services business that needs an OFR license.⁸

The result is a coverage gap: a large share of kiosks fall outside Florida licensing entirely. CS/HB 505 closes that gap by requiring *registration* of kiosk businesses regardless of whether they act as an intermediary, while preserving the existing *license* requirement for those that do. (Federal law is unaffected: kiosk businesses engaged in money transmission remain money services businesses under the Bank Secrecy Act and must still register with FinCEN.)⁹

What the Bill Does

A New Part V of Chapter 560

The bill expands the statutory definition of "money services business" to include virtual currency kiosk businesses and creates a new **Part V of Chapter 560, F.S. — "Virtual Currency Kiosk Businesses"** — to

house the new rules. Critically, unlike other money services businesses, kiosk businesses are **not** required to obtain a license; instead they must apply for and obtain a **registration** from OFR. The bill also updates the existing prohibitions and penalties for unlicensed activity so they reach operating as a kiosk business without a registration, and it authorizes the Financial Services Commission to adopt implementing rules.¹⁰

Registration vs. Licensure: Who Needs What

The single most important structural question for any operator is whether it needs a *registration*, a full money services business *license*, or both. The bill draws the line at money transmission.

Registration vs. Licensure Under CS/HB 505

Your operating model	What CS/HB 505 requires
Kiosk business that does not act as a money transmitter (direct peer-to-peer sales from own inventory)	Must obtain a virtual currency kiosk registration from OFR. No money transmitter license required.
Kiosk business that does act as a money transmitter (intermediary transmitting to a third party)	Must obtain a full money services business (money transmitter) license . The bill prohibits acting as a money transmitter for kiosk transactions without that license.
Already-licensed money transmitter that also offers kiosk services	Exempt from the separate registration , but still fully subject to the bill's disclosure, transaction-limit, receipt, and refund requirements.

The bottom line on coverage

Every operator is covered by the consumer-protection rules — disclosures, daily limits, receipts, and refunds — no matter which box it falls in. The registration-versus-license distinction only changes *which authorization* you must hold, not whether the customer-facing duties apply.

Registration Requirements and Renewal

The registration framework takes effect January 1, 2027, with the actual prohibition on operating without a registration beginning March 1, 2027. A kiosk registration is **not transferable or assignable**.¹¹

What the Application Must Contain

An applicant for a virtual currency kiosk registration must submit to OFR an application that includes:

- The applicant's legal name, any fictitious or trade names, and physical and mailing addresses.

- The date and state of formation, if applicable.
- For each control person: name; identification number (Social Security, alien identification, or taxpayer identification number); business and residential addresses; and employment history for the past five years.
- A description of the applicant's organizational structure, including any parent or subsidiary entities and whether any are publicly traded.
- The name and mailing address of the registered agent in the state.
- The physical address of each virtual currency kiosk the applicant plans to operate in Florida.
- An **attestation that the applicant has documented and implemented blockchain-analytics policies and procedures** to prevent transfers to wallet addresses linked to known criminal activity, integrated into its compliance program.
- Any other information required by statute or by Financial Services Commission rule.

Applicants must cure any deficiencies within a timeframe set by Commission rule, and registrants must report changes to their application information within **30 days** of the change taking effect.¹²

Renewal, Inactivity, and Expiration

Registrations must be renewed **annually, by December 31 of the year before expiration**. To renew, a registrant submits either updated application information (if anything changed) or an affidavit confirming nothing changed. On request, OFR may require evidence of compliance with the disclosure, transaction-limit, receipt, and refund rules.

Registration Lifecycle

Stage	What happens
Renewal deadline	By December 31 of the year before expiration.
Missed deadline	Registration becomes inactive for 60 days ; the registrant may not conduct business in Florida while inactive.
Cure window	Within those 60 days, submit updated application/affidavit plus evidence of compliance (current disclosures, transaction-limit reports, copies of receipts, refund records, and blockchain-analytics use).
Expiration	Fail to renew within the 60-day window and the registration expires — a new application and new registration are then required before operating.
Denial grounds	OFR may deny if a control person or the registrant engaged in unlawful business practices or was convicted of / pled to crimes involving dishonesty, fraud, or moral turpitude. A false statement renders the registration void and is no defense to prosecution.

Operators Already in Business

Hard deadline for existing operators

A virtual currency kiosk business **operating in Florida before January 1, 2027 must submit a registration application to OFR by January 31, 2027.** If you run kiosks in Florida today, this is the date to circle.¹³

Consumer-Protection Requirements

These duties — effective January 1, 2027 — apply to **every** covered operator, including licensed money transmitters that offer kiosk services and are otherwise exempt from registration.

Daily Transaction Limits

The bill caps how much a customer may transact per calendar day, with the cap depending on how long the customer has been doing business with the operator:

Daily Transaction Caps

Customer type	Definition	Daily limit
New customer	Has transacted with the kiosk business for less than 7 days.	\$2,000 per calendar day
Existing customer	Has transacted with the kiosk business for 7 or more days.	\$10,000 per calendar day

These limits apply **in aggregate** — regardless of whether the customer uses a single transaction or many, and regardless of whether the activity runs through one kiosk or several. To make the cap enforceable, the bill requires the kiosk to ask the customer to confirm whether they have transacted at another kiosk on the same day, and in what amount.¹⁴

Disclosures and the Fraud Warning

Before a customer may initiate a transaction, the kiosk must clearly display a fraud warning on screen. The bill prescribes the exact language:

Mandatory on-screen warning (verbatim statutory text)

"WARNING: FRAUD OFTEN STARTS WITH CONTACT FROM A STRANGER. IF YOU HAVE BEEN DIRECTED TO THIS MACHINE BY SOMEONE CLAIMING TO BE A GOVERNMENT AGENT, BILL COLLECTOR, LAW ENFORCEMENT OFFICER, OR ANYONE YOU DO NOT KNOW PERSONALLY, STOP THIS TRANSACTION IMMEDIATELY AND CONTACT YOUR FINANCIAL ADVISOR OR LOCAL LAW ENFORCEMENT."

Receipt Requirements

The operator must offer the customer a choice of a **physical or electronic receipt**, which must include all of the following:

- Name and contact information of the owner or operator, including a **toll-free telephone number and an email address**.
- Date, time, value, and type of the transaction.
- The **transaction hash** and each wallet used.
- Total fee charged.
- Exchange rate, if applicable.
- A statement of the kiosk's liability, if any, for non-delivery or delayed delivery of the currency.
- The business's refund policy.¹⁵

The 72-Hour Refund Right

The bill creates a limited but meaningful refund right for fraud victims. A kiosk business must issue a **full refund within 72 hours** for a customer's **first** kiosk transaction if *all* of these conditions are met:

1. The customer contacts **both** the kiosk business **and** a law enforcement or governmental agency within **60 days** after the transaction; and
2. The customer provides proof of the alleged fraud — such as a police report or a notarized affidavit.¹⁶

Scope of the refund right

Note the boundaries: the refund obligation applies to the customer's *first* transaction only, requires timely dual notice (business *and* a government/law-enforcement agency), and requires documentary proof. Operators should build intake and verification procedures that can evaluate and pay qualifying claims inside the 72-hour window.

Key Definitions

The bill adds several defined terms to Chapter 560. The ones most likely to drive day-to-day compliance decisions are below.

Defined Terms That Matter

Term	Definition (as enrolled)
Virtual currency kiosk	An electronic terminal that acts as a mechanical agent of the kiosk business, enabling it to facilitate the exchange of virtual currency for fiat currency or other virtual currency for a customer.
New customer	A customer who has transacted with the kiosk business for less than 7 days.

Term	Definition (as enrolled)
Existing customer	A customer who has transacted with the kiosk business for 7 or more days.
Transaction hash	A unique identifier — a string of characters — that provides a verifiable record that a transaction has been confirmed and added to the blockchain.
Wallet	Hardware or software that enables customers to store, use, send, receive, and spend virtual currency, or store virtual currency private keys or passcodes.
Blockchain	A mathematically secured, chronological, decentralized, distributed, digital ledger or database of transaction records that cannot be altered retroactively.
Blockchain analytics	The process of examining, monitoring, and gathering insights from data and transaction patterns on a blockchain network — to monitor network health, track transaction flows, and identify security threats including illicit activity.
Virtual currency	Per existing s. 560.103(36), F.S.: a medium of exchange in electronic or digital format that is not currency (excluding closed-loop game and rewards currencies).

Enforcement and the Money-Transmitter Overlap

CS/HB 505 folds kiosk businesses into Chapter 560's existing enforcement architecture. Operating as a kiosk business without a registration is treated like other unlicensed money-services activity, and the corresponding prohibitions and penalties are updated to reach it.¹⁷

Operators that also act as money transmitters carry the full weight of the existing license regime on top of the new kiosk rules. For reference, money transmitter licensure under Chapter 560 currently includes a \$375 nonrefundable application fee, fingerprints for each control person, a written anti-money-laundering program, proof of a minimum **\$100,000 net worth**, a corporate surety bond or collateral ranging from **\$50,000 to \$2,000,000** based on size and number of locations, and an annual financial audit; licenses run two years and renew for a \$750 fee. OFR retains authority to examine, fine, impose corrective action, and suspend or revoke.¹⁸

The blockchain-analytics attestation is a substantive obligation

The registration attestation is not a check-the-box formality. An applicant must certify that it has *documented and implemented* blockchain-analytics controls to block transfers to wallet addresses tied to known criminal activity, and that these controls are *integrated into its compliance program*. On renewal, OFR can ask for evidence of current blockchain-analytics use. Operators without such tooling today should treat this as a build-now item.

Effective Dates and What To Do Now

Assuming the Governor signs the bill, the key dates fall as follows. The act takes effect January 1, 2027, "except as otherwise expressly provided," and is expressly subject to the Governor's veto power.¹⁹

Regulatory Timeline

Milestone	Date	Notes
Passed Legislature (enrolled)	March 12, 2026	House 107–0; Senate 37–0. Governor's action pending.
Governor's action	Pending	Sign, veto, or allow to become law without signature. Expected to be signed.
Act takes effect	January 1, 2027	Definitions, transaction limits, disclosures, receipts, refunds, and application requirements.
Existing-operator filing deadline	January 31, 2027	Businesses operating before Jan 1, 2027 must file a registration application by this date.
Registration prohibition begins	March 1, 2027	Operating without a registration (or renewal) is prohibited as of this date.
First annual renewal	By December 31 (annually)	Renew before the year of expiration ends.

Steps to take now

1. **Classify your model.** Determine whether each line of business is a registration-only kiosk operation or money transmission that also requires an MSB license. The answer drives everything else.
2. **Inventory your kiosks.** Compile the physical address of every machine you operate in Florida — the application requires it, location by location.
3. **Stand up blockchain-analytics controls.** If you cannot today attest to documented, implemented controls that block transfers to criminally linked wallets, begin procurement and policy work now.
4. **Re-engineer the customer flow.** Build the on-screen fraud warning, the same-day cross-kiosk transaction prompt, the new/existing customer logic for the \$2,000 / \$10,000 caps, and compliant physical/electronic receipts (including transaction hash and toll-free contact).
5. **Create a refund procedure.** Design intake and verification able to evaluate and pay qualifying first-transaction fraud refunds within 72 hours.
6. **Calendar the deadlines.** January 31, 2027 (existing-operator filing) and March 1, 2027 (prohibition) are the dates that create exposure if missed.

Conclusion

CS/HB 505 is a focused, consumer-protection-driven response to a real and costly fraud problem. For operators, it converts a patchwork — where many kiosks escaped Florida oversight entirely — into a clear obligation: register with OFR, hold the right authorization for your model, and build fraud controls, disclosures, limits, receipts, and refunds into the machine and the back office.

The bill is not yet law. But it passed without a single dissenting vote, and the path to enactment is clear. Operators who wait for the Governor's signature before starting will have lost months they will need: standing up blockchain analytics, rebuilding the kiosk transaction flow, and filing by the January 31, 2027 deadline are not overnight tasks. The prudent course is to prepare now and adjust if the final, signed text differs.

AML Consulting Solutions will publish an updated edition once the Governor acts and the chapter-law number is assigned.

Endnotes

1. CS/HB 505 (2026), "Virtual Currency Kiosks," sponsored by Reps. Owen and Daley; companion CS/CS/SB 198 (Sen. Rouson). Florida House of Representatives Final Bill Analysis (h0505z), dated March 25, 2026.
2. The bill creates Part V of Chapter 560, Florida Statutes, entitled "Virtual Currency Kiosk Businesses" (Section 5 of the bill).
3. Florida Senate, CS/HB 505 bill history: "Ordered engrossed, then enrolled," March 12, 2026. Final Bill Analysis (h0505z), header: "GOVERNOR'S ACTION: Pending." flsenate.gov/Session/Bill/2026/505.
4. Vote totals from the official bill history: House passed 108–0 (Feb. 17, 2026); Senate passed as amended 37–0 (Feb. 25, 2026); House concurred 107–0 (March 12, 2026). SB 198 committee votes 10–0, 9–0, 24–0; laid on the table in favor of CS/HB 505.
5. Final Bill Analysis (h0505z), "Relevant Information — Virtual Currency Kiosks," citing FinCEN Notice on the Use of Convertible Virtual Currency Kiosks (Aug. 4, 2025) and FTC, "Bitcoin ATMs: A payment portal for scammers" (Sept. 3, 2024).
6. Coin ATM Radar, "Bitcoin ATMs in Florida," as cited in the Final Bill Analysis (37 operators; 3,150 kiosks, as of December 2025).
7. Final Bill Analysis (h0505z), citing OFR (email from Jason Holloway, Director of Fintech Policy, OFR, Dec. 2, 2025): FBI and FTC Florida-based kiosk fraud complaints exceeding \$33 million in alleged losses, January 2020–December 2025.
8. Florida OFR, Biennial Report (December 2024), p. 32, as cited in the Final Bill Analysis; ss. 560.103(23), (24), and 560.125, F.S.
9. 31 C.F.R. § 1022.380(a); FinCEN, "Application of FinCEN's Regulations to Certain Business Models Involving Convertible Virtual Currencies" (May 9, 2019), as cited in the Final Bill Analysis.
10. Bill Sections 1, 3, 4, 5, and 7; rulemaking authority granted to the Financial Services Commission (Final Bill Analysis, "Rulemaking").
11. Effective dates and non-transferability: Final Bill Analysis, "Virtual Currency Kiosks" and "Registration" (effective Jan. 1, 2027; registration prohibition effective March 1, 2027), Section 7.
12. Application contents and 30-day change reporting: Final Bill Analysis, "Registration applications," Section 8.
13. Final Bill Analysis, Section 8: "Virtual currency kiosk businesses operating in Florida before January 1, 2027, must submit a registration application to OFR by January 31, 2027."
14. Transaction limits and the same-day cross-kiosk confirmation: Final Bill Analysis, "Transaction limits" (Section 6) and "Disclosure requirements" (Section 9).
15. Receipt contents and the definitions of "transaction hash" and "wallet": Final Bill Analysis, "Receipt requirement" (Section 11) and "Definitions" (Section 6).
16. Refund conditions: Final Bill Analysis, "Refund requirement" (Section 12).
17. Updated prohibitions and penalties for unlicensed/unregistered activity: Final Bill Analysis, Sections 3 and 4.
18. Money transmitter licensure parameters under current law: Final Bill Analysis, "Money Transmitters," ss. 560.141, 560.143, and 560.209, F.S.
19. Effective date and veto reservation: Final Bill Analysis, "Effective date," Section 13 ("Subject to the Governor's veto powers, the bill takes effect on January 1, 2027, except as otherwise expressly provided").



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