

**DEPARTMENT OF THE PROSECUTING ATTORNEY
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CITY AND COUNTY OF HONOLULU**

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**THE HONORABLE JARRETT KEOHOKALOLE, CHAIR
SENATE COMMITTEE ON COMMERCE AND CONSUMER PROTECTION**

**THE HONORABLE BRANDON J.C. ELEFANTE, CHAIR
SENATE COMMITTEE ON LABOR AND TECHNOLOGY**

**Thirty-Third State Legislature
Regular Session of 2026
State of Hawai'i**

February 5, 2026

**RE: S.B. 2387; RELATING TO DIGITAL FINANCIAL ASSET TRANSACTION
KIOSKS.**

Chairs Keohokalole and Elefante, Vice Chairs Fukunaga and Lamosao, Rhoads, and members of the Joint Senate Committees on Commerce and Consumer Protection and Labor and Technology, the Department of the Prosecuting Attorney of the City and County of Honolulu submits this testimony in **support** of S.B. 2387 with a **recommended amendment**.

S.B. 2387 establishes reasonable transaction limits, mandatory fraud warnings, and clear disclosures regarding fees, exchange rates, and risks. These measures are critical. Many victims—particularly elderly or vulnerable individuals—lose life-altering sums of money in a single day or over a short period. The bill's daily and monthly caps meaningfully reduce the potential harm while still allowing lawful use of the technology.

Required on-screen scam warnings, written in plain language and displayed prominently, mirror fact patterns we see repeatedly in criminal cases. Posing as government agents, law enforcement, or bill collectors, con artists may frighten victims into parting with their money. Conversely, some swindlers impersonate helpful computer technicians or acquaintances of a family member. Timely warnings can interrupt the emotional hijacking critical to many of these schemes.

S.B. 2387 requires kiosk operators to use blockchain analytics and tracing software. This provision is particularly important. While digital assets are often described as anonymous, modern investigative tools can identify fraud patterns and trace transactions when operators enable commonsense recordkeeping software. Not only can this assist in combating fraud, but it is also essential for defeating money laundering schemes.

The refund provision deserves special mention. In many fraud cases, even when a suspect is identified, restitution is unlikely or delayed. Requiring operators to issue refunds when fraud is promptly reported provides immediate relief to victims and reduces the long-term emotional and financial harm caused by these crimes.

The Department recommends one small but significant amendment. At page 1, line 9, we recommend replacing the “or” with an “and.”

“The English word ‘or’ is ambiguous, having two related but distinguishable meanings.”¹ In its exclusive or disjunctive sense, “or” denotes mutually exclusive propositions. The mugger who threatens “Your money or your life” offers the victim a choice to keep one or the other, but not both. Conversely, in its inclusive or conjunctive sense, “or” permits the combination of alternatives: a sound homeowner’s policy covering fire or flood should still protect the unlucky dwelling struck by both disasters.

This bill is best read in its conjunctive sense: it can only work if there is both a discrete and an aggregate limit on transactions. And ordinarily, a Hawai‘i can freely construe “or” in its conjunctive sense.² But penal statutes are different: one instead presumes the disjunctive.³ Substituting “and” would clarify the ambiguity: it would make it clear that both a daily limit and a monthly limit apply.

Thank you for the opportunity to testify.

¹ IRVING M. COPI ET AL., INTRODUCTION TO LOGIC 269 (15th ed. 2019). See also Layman E. Allen, *Symbolic Logic: A Razor-Edged Tool for Drafting and Interpreting Legal Documents*, 66 YALE L.J. 833, 842-848 (1957) (distinguishing formally between the inclusive and exclusive “or”).

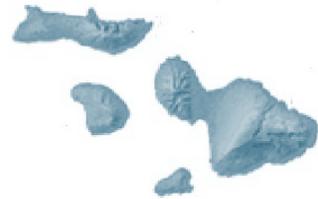
² HRS § 1-18.

³ *State v. Sorenson*, 44 Haw. 601, 604-05, 359 P.2d 289, 291 (1961).

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TESTIMONY ON
H.B. 2003
RELATING TO DIGITAL FINANCIAL ASSET TRANSACTION KIOSKS

February 5, 2026

The Honorable Jarrett Keohokalole
Chair
The Honorable Carol Fukunaga
Vice Chair
and Members of the Committee on Commerce and Consumer Protection

The Honorable Brandon C. Elefante
Chair
The Honorable Rachele Lamosao
Vice Chair
and Members of the Committee on Labor and Technology

Chairs Keohokalole and Elefante, Vice Chairs Fukunaga and Lamosao, and Members of the Committees:

The Department of the Prosecuting Attorney, County of Maui respectfully submits the following comments **in support of S.B. 2387, Relating to Digital Financial Asset Transaction Kiosks**. This measure imposes various requirements for operators of digital financial asset transaction kiosks.

The Department of the Prosecuting Attorney, County of Maui supports this bill in part because of the increasing number of financial scams involving innocent citizens tricked into sending cash, gift cards or wire transfers to criminals via phone or internet contact. Digital financial asset transaction kiosks are another tool in a scammer's arsenal: They're the electronic equivalent of an ATM, with the added danger that digital assets purchased at one of these kiosks can be immediately transferred to a scammer's digital wallet and are nearly impossible to recover.

This bill would protect our community by, *inter alia*, creating daily and monthly transaction limits on kiosk transfers by a single person,¹ as well as requiring multiple warnings and disclosures to consumers about digital assets in general and their potential for use in scams. It would also require each kiosk operator to implement a refund process for fraudulent transactions and provide point of contact information for regulating government entities. These protections are a vital part of ensuring that digital asset transactions at these kiosks are safe, secure and legitimate.

For these reasons, the Department of the Prosecuting Attorney, County of Maui **supports S.B. 2387**. Please feel free to contact our office at (808) 270-7777 if you have any questions or inquiries. Thank you very much for the opportunity to provide testimony on this bill.

¹ We would note that the transaction limit language may need to be clarified. As drafted, it is ambiguous whether the \$10,000.00/month limit takes precedence over multiple \$2000.00 transactions over six or more days. We think the intent is to prohibit more than \$2000.00 or the equivalent each day, with a maximum transfer amount of \$10,000.00 or equivalent in any thirty day period regardless of the amount transferred per day.



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The Thirty-Third State Legislature
Senate Committee on Commerce and Consumer Protection
Senate Committee on Labor and Technology
February 6, 2026
Conference Room 229, 10:00 a.m.

TO: The Honorable Jarrett Keohokalole, Chair
The Honorable Brandon J.C. Elefante, Chair
FROM: Keali'i S. López, State Director
RE: Strong Support for S.B. 2387 Relating to Digital Financial Asset Transaction Kiosks

Aloha Chair Keohokalole, Chair Elefante and Members of the Committees:

I am Keali'i Lopez, State Director for AARP Hawai'i. AARP is a nonprofit, nonpartisan, social impact organization dedicated to empowering people fifty and older to choose how they live as they age. We advocate for the issues that matter most to older adults and their families. On behalf of our 135,000 members, thank you for the opportunity to share our testimony.

AARP Hawai'i is in strong support of S.B. 2387, which strengthens consumer protections and reduce fraud risk at cryptocurrency kiosks. The bill would require:

- Setting a limit of \$2,000 per transaction per day, not exceeding an aggregate of \$10,000 over any 30-day period to prevent significant financial losses.
- Cryptocurrency kiosk operators to refund fraudulent transactions.
- Clear terms and conditions be displayed before a transaction, including all fees and exchange rates.
- Posting visible notices on the kiosks that tell people what to do if they suspect fraudulent activity.
- Giving paper receipts with relevant transactional information to the customer in case law.
- Enforcement needs to investigate fraudulent activity.
- Providing live customer service support during operating hours.
- Providing dedicated line of communications for law enforcement.

AARP is not opposed to cryptocurrency, nor are we “against” cryptocurrency kiosks. We simply want safeguards in place to protect consumers from criminals carrying out fraudulent activity using these kiosks.



Recommended Amendment

AARP respectfully requests the following amendment to clarify the transaction limit provisions. As currently drafted with the word “or,” S.B. 2387 would permit a scammer to have a victim deposit up to \$10,000 in a day if the consumer doesn’t do another transaction within a 30-day period. We believe this is not the intent of the language. Lower transaction limits reduce harm and give victims a chance to stop before losing more money. The additional clarification ensures that both the daily and aggregate monthly limits are applied consistently and enforceable.

Amendment Language

Under Section I, modify the transaction limits as follows:

- Line 5-11: replaced in its entirety with the following:
 - a) An operator shall not accept transactions from a single customer of more than \$2,000 in U.S. dollars or the equivalent in digital financial assets per day through a digital financial asset transaction kiosk. In addition, the transaction limit shall not exceed \$10,000 in U.S. dollars or the equivalent in digital financial assets in any thirty (30) day period.

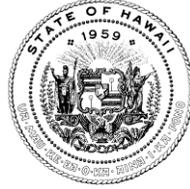
Fraud involving cryptocurrency kiosks is rising sharply nationwide. According to the FBI’s Internet Crime Complaint Center (IC3), there were 68 reported complaints in 2024, with losses totaling \$922,022 in Hawai’i. Nationally, there were 11,000 complaints reporting \$250 million in losses, reflecting a 99% increase over 2023.

There are at least 96 cryptocurrency kiosks across Hawai’i (source: coinatmradar.com). These machines—often located in supermarkets, gas stations, convenience stores, bars, and restaurants—closely resemble traditional ATMs but are subject to far fewer consumer-protection regulations. Unlike traditional financial transactions, cryptocurrency transfers are typically irreversible, making them highly attractive to scammers.

Older adults are disproportionately vulnerable to financial exploitation through cryptocurrency ATMS. Without strong statutory safeguards, criminals take advantage of these kiosks to siphon millions of dollars through fraudulent payment schemes. Establishing clear transaction limits and mandatory consumer protections helps safeguard residents while giving regulators and law enforcement stronger tools to deter and investigate fraud.

By adopting the safeguards in S.B. 2387—with the recommended amendments—Hawai’i can enact legislation that fights fraud and protects the pocketbooks of kūpuna and other consumers.

Thank you for the opportunity to testify in strong support of this important legislation.



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Testimony of the Department of Commerce and Consumer Affairs

Before the
Senate Committee on Commerce and Consumer Protection
Senate Committee on Labor and Technology
Friday, February 6, 2026
10:00 a.m.
Via Videoconference

On the following measure:
S.B. 2387, RELATING TO DIGITAL FINANCIAL ASSET TRANSACTION KIOSKS.

Chair Keohokalole, Chair Elefante, and Members of the Committees:

My name is Emma Olsen, and I am an Enforcement Attorney at the Department of Commerce and Consumer Affairs' (Department) Office of Consumer Protection (OCP). The Department supports the intent of this measure and offers the following comments.

The purpose of this bill is to curb fraud occurring through digital financial asset kiosks, or bitcoin kiosks, by implementing daily and monthly transaction limits, requiring operators to use blockchain analytics to prevent fraud, requiring certain disclosures, providing printed receipts to consumers, providing full refunds under certain circumstances, requiring the operator to provide live customer service, and requiring a dedicated phone line to certain government agencies.

We support mitigating harms to consumers due to financial losses from fraud occurring at digital financial asset kiosks. We strongly support H.B. 1642, which would enact a ban on digital financial asset kiosk activity, as a ban would better protect the

consumer. We support the intent of this bill, because in the absence of a ban, this bill provides meaningful consumer protections. Those consumer protections could be strengthened by clarifying that operators must abide by both the daily and monthly transaction limits, are not free to choose to abide by one but not the other, and the daily and monthly limits imposed on each operator are intended to be aggregate limits, not to be limits that apply separately at each of the operators' kiosks.

Fraudulent activity involving bitcoin kiosks has resulted in significant financial losses to consumers. At present, Hawai'i has over two hundred bitcoin kiosks located in publicly accessible places like supermarkets, liquor stores, and gas stations. Credible reports nationwide and in Hawaii demonstrate scammers use digital financial asset kiosks to defraud consumers. The scammer creates a sense of urgency or builds trust with the victim and then, often over the phone, directs the victim to deposit large amounts of cash into a bitcoin kiosk, which goes directly to the scammer's digital wallet.

Attorneys General in Iowa and Washington D.C. have sued kiosk operators and announced finding through their investigations that scam transactions account for more than 93% of transactions. Iowa Attorney General Bird sued two cryptocurrency kiosk operators, Bitcoin Depot and CoinFlip. AG Bird announced that the investigation had to that point found that more than 98% of funds sent through Bitcoin Depot ATMs and more than 94% of funds sent through CoinFlip ATMs were scam transactions, and consumers had lost at least \$20 million in transactions through the two operators. Washington D.C. Attorney General Schwalb sued cryptocurrency kiosk operator Athena. AG Schwalb announced that according to the company's own data, obtained during the course of investigation, 93% of all Athena BTM deposits were the direct result of scams, nearly half of all deposits were flagged to Athena as the product of fraud, and the median amount lost per scam transaction was \$8,000, with one victim losing a total of \$98,000.

The refund provision in this bill creates an important remedy that may encourage operators to innovate and implement new more effective fraud deterrents. At present, many kiosk operators do not provide refunds, and when they do, they refund only the transaction fees, which comprise perhaps 20%-30% of the original transaction amount.

Requiring full refunds, as this bill proposes, is a crucial first step, and could spur innovation by legitimate kiosk operators concerned with reducing fraud on their platforms.

Should the Committee intend to vote this bill through, we respectfully request the following amendments clarifying that the daily and monthly transaction limits both apply, and the daily and monthly limits imposed on each operator are intended to be aggregate limits, not to be separate limits at each of the operators' kiosks.

At page 1, line 9, delete "or" and replace it with "and" to clarify that both the \$2,000 aggregate limit and the \$10,000 aggregate limit apply, and kiosk operators may not choose to apply one limit and ignore the other. At page 1, line 11 add the following underscored language to clarify that the \$2,000 daily limit and the \$10,000 30-day limit apply to each operator in the aggregate, not per kiosk:

- (1) \$2,000 or the equivalent in digital financial assets per day; ~~[or]~~ and
 - (2) \$10,000 or the equivalent in digital financial assets in any thirty-day period
- The \$2,000 and \$10,000 transaction limits apply to each operator in the aggregate. No operator shall accept transactions exceeding the applicable \$2,000 or \$10,000 aggregate limit for their respective time period.

We respectfully suggest that OCP may require additional resources for the enforcement of the bill's proposed consumer protections. We appreciate the proposed increase of enforcement responsibilities and we are open to discussing additional resources.

Thank you for the opportunity to testify on this bill.

JOSH GREEN, M.D.
GOVERNOR OF HAWAII
KE KIA'ĀINA O KA MOKU'ĀINA 'O HAWAII



CAROLINE CADIRAO
DIRECTOR
Executive Office on Aging

KENNETH FINK, MD, MGA, MPH
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**Testimony in SUPPORT of SB2387
RELATING TO DIGITAL FINANCIAL ASSET TRANSACTION KIOSKS**

COMMITTEE ON COMMERCE AND CONSUMER PROTECTION

SENATOR JARRETT KEOHOKALOPE, CHAIR
SENATOR CAROL FUKUNAGA, VICE CHAIR

COMMITTEE ON LABOR AND TECHNOLOGY

SENATOR BRANDON J.C. ELEFANTE, CHAIR
SENATOR RACHELE LAMOSAO, VICE CHAIR

Testimony of Caroline Cadirao
Director, Executive Office on Aging
Attached Agency to the Department of Health

Hearing: Thursday, February 6, 2026, 10:00A.M. Conference Room:229

- 1 **Purpose:** This measure proposes consumer protection safeguards for cryptocurrency transactions
- 2 conducted through kiosks and ATMs to reduce the risk of fraudulent activities.
- 3 The prevalence of cryptocurrency and kiosk-related scams in Hawai'i is a growing concern. In
- 4 2024, the FBI reported nearly 11,000 complaints involving crypto kiosks nationwide, resulting in
- 5 losses totaling approximately \$247 million. These figures are likely to be underreported,
- 6 meaning the actual impact could be significantly higher.
- 7 **Recommendation:** EOA strongly supports this measure as an important step toward protecting
- 8 the financial security and well-being of our kūpuna.
- 9 Thank you for the opportunity to provide testimony.



**TESTIMONY SUBMITTED TO THE HAWAII SENATE
COMMITTEES ON COMMERCE & CONSUMER PROTECTION AND LABOR &
TECHNOLOGY**

**Clara Wulfsen, Associate Director of Government Affairs
February 6, 2026**

Chairs Keohokalole and honorable members of the Senate Commerce & Consumer Protection and Labor & Technology Committees, thank you for the opportunity to provide testimony today regarding SB 2387.

CoinFlip opposes certain language in SB 2387 relating to the proposed regulation of virtual currency kiosks. However, CoinFlip does support proposed regulatory measures that would further consumer protection including but not limited to licensure, mandatory disclosures, compliance program requirements, and technology requirements. We appreciate the opportunity to offer additional consumer protection-focused recommendations that we know to be highly effective in preventing fraudulent transactions at virtual currency kiosks and look forward to continuing to work with the State of Hawaii to protect consumers.

Company Background

CoinFlip is a Chicago-based, global digital currency platform, focused on providing consumers a simple and secure way to buy and sell virtual currency. Founded in 2015, CoinFlip is one of the world's largest operators of virtual currency kiosks, with more than 5,000 locations across the United States and in nine countries around the world, employing more than 200 people.

CoinFlip's kiosks make buying and selling major cryptocurrencies accessible and secure for consumers who wish to purchase their virtual currency using cash. CoinFlip has operated in the State of Hawaii since 2020. We applied for a money transmitter license in 2025, but were told by the department none was required. Additionally, CoinFlip is a money service business ("MSB") registered with the Financial Crimes Enforcement Network. As an MSB, CoinFlip is subject to the Bank Secrecy Act ("BSA"), the United States PATRIOT Act, and their implementing rules and regulations.

CoinFlip embraces licensing regimes as an effective means to create baseline requirements for operations, as well as effective oversight. CoinFlip holds approximately 39 money transmitter licenses with additional applications currently pending. CoinFlip has moved to obtain these licenses, even in states where there is no current licensing requirement, like Hawaii.

It is vital that smart, pro-consumer regulations are enacted to provide needed guardrails to the industry. However, it is important to remember that of all cryptocurrency scams that happened in the U.S. in 2024 (latest year data available), 3% happened at a kiosk, and 97% at another product.

Additionally, the vast majority of the financial fraud still occurs at traditional financial institutions, gift cards, and payment apps like Venmo and PayPal.

Our third-party blockchain analytics firm monitors our transaction data, blocks blacklisted wallets, and is what law enforcement uses to track the flow of funds. CoinFlip's data shows less than 1% of our transactions are related to illicit activity, in-line with other traditional financial institutions.

SB 2387

Unfortunately, SB 2387 relies on policy recommendations that create a false sense of consumer protection. The proposed transaction limits in the bill do not adequately consider federal reporting requirements. Under federal law, CoinFlip is required to file a Suspicious Activity Report ("SAR") for any suspected suspicious transactions of at least \$2,000 and a Currency Transaction Report ("CTR") for transactions above \$10,000. This information is placed in a repository for law enforcement to quickly and accurately conduct investigations.

Hawaii's proposed \$2,000/day transaction limit and \$10,000 monthly aggregate limit would encourage bad actors to split transactions across multiple operators ("stacking") in order to avoid state thresholds, undermining AML monitoring and making scams harder to detect. These limits would also reduce reporting: if transactions are forced below federal CTR thresholds, kiosk operators will not file CTRs, resulting in less information available to law enforcement.

Lastly, the refund provisions found in SB 2387 are unprecedented for money service businesses. No other financial service product has statutory requirements for authorized transactions like contained in this bill. Under Regulation E, a consumer is entitled to a refund only for an unauthorized transfer, not for transactions the consumer authorized or participated in (12 C.F.R. §§ 1005.2(m), 1005.11). Imposing this refund obligation solely on kiosk operators implies that no other participant in the scam ecosystem, such as phone carriers, social media platforms, email providers, or financial institutions, shares responsibility for the transaction, despite their role in enabling the fraud.

Proposed Consumer Protection Policies

CoinFlip believes smart regulation is good for business. We believe that a regulatory framework is necessary to protect consumers and encourage innovation in the industry; however, transaction limits and refund provisions as currently proposed in SB 2381 are a de facto ban on operating in Hawaii and do not take into consideration federal reporting requirements. Instead, we developed the following best practices that would further enhance consumer protections and support their inclusion in any legislation:

- **Require licensure with the state.** CoinFlip believes a money transmitter license should be required for all virtual currency kiosk operators, allowing for state oversight and periodic audits to determine the adequacy of compliance, finance, and cybersecurity programs.
- **Require robust compliance programs.** Kiosk operators should be required to directly employ a qualified, in-house, Chief Compliance Officer and compliance team, that does

not have a large ownership interest in the company. At CoinFlip, we take compliance seriously: our Chief Compliance Officer is a former federal prosecutor, and our general counsel is a former Illinois Assistant Attorney General.

- **Require clear, highly visible warnings and fee disclosures.** We agree with the proposed legislation regarding the requirement of clear disclosures regarding all fees and terms of service. We also believe highly visible fraud warnings should be required to be displayed and acknowledged by the customer prior to the initiation and completion of any transaction.
- **Require blockchain analytics.** The use of blockchain analytics technology should be required to fight fraud by automatically blocking customer transactions to high-risk digital wallets.
- **Require live customer service.** Customer service is the first line of defense for consumer protection. We believe every virtual currency kiosk operator should be required to provide trained, live customer service at minimum during business hours.

CoinFlip shares your goals of consumer protection. Although blockchain technology and virtual currency kiosks are new, the fraud we see reported is all too familiar. Whether it's phone, email, text or an online pop-up, scammers repackage the same old tactics and utilize whatever methods they have at hand – Venmo, PayPal, Zelle, Gift Cards, MoneyGram or virtual currency kiosks – to dupe people out of their money.

The best defense for consumers is to be well-informed and well-alerted at the point of transaction. The best defense for companies is to have the right tools in place to help identify and fight fraud and help law enforcement catch the bad actors.

Dear Chair and Members of the Committee:

Bitcoin Depot respectfully submits this testimony in opposition to SB 2387 as currently drafted. While we firmly endorse approximately 90% of this legislation—specifically the provisions regarding robust consumer protections, mandatory risk disclosures, and the integration of blockchain analytics—we believe critical refinements are necessary to ensure the bill effectively combats fraud without unintentionally dismantling a legitimate industry. My perspective is informed by my professional background in Homeland Security, where I specialized in protecting critical infrastructure from global ransomware syndicates and nation-state actors. My goal is to help this Committee craft a framework that balances responsible industry growth with the rigorous oversight required to detect, disrupt, and deter criminal activity.

Bitcoin Depot is fully committed to the fight against fraud; it harms our customers, damages our reputation, and undermines the integrity of the digital asset ecosystem. However, it is essential to recognize that kiosks are only one component of a much larger financial landscape. According to FBI data, the vast majority of cryptocurrency-related fraud occurs on centralized exchanges, while wire fraud and gift card scams remain the primary vehicles for criminal syndicates. The sophisticated social engineering deployed by modern scammers is a systemic threat that transcends any single industry. When a criminal utilizes Voice over Internet Protocol (VoIP) services to spoof a caller ID and manipulates a victim into a high-pressure "heat of the moment" state, the failure is multifaceted. These bad actors are experts at coaching victims to bypass existing safeguards and common-sense warnings. Consequently, shifting 100% of the liability to virtual currency kiosks ignores the critical roles played by the telecommunications providers that facilitate spoofing, the banking institutions that allow the initial funding of these scams, and the social media platforms

that allow the initial funding of these scams, and the social media platforms where these predatory relationships are cultivated.

To be effective, our legislative focus must target the source of the crime rather than simply penalizing the "end point" of the transaction. Although the industry is still young, Bitcoin Depot does not wait for regulation to catch up; we lead by setting high standards for security and transparency. Our operations utilize universal ID verification for every customer regardless of transaction amount—a safeguard that exceeds current federal law. We have pioneered specific protections for seniors to disrupt patterns associated with elder fraud and maintain routine engagement with local, state, and federal law enforcement. Through real-time intelligence sharing on the Deconflict app, we ensure that investigations are not siloed, providing agencies with the coordinated data they need to pursue bad actors effectively.

As it pertains to provisions in the bill, Bitcoin Depot's position is firm: we have zero desire to profit from fraudulent activity. While we support the concept of fee refunds for verified victims of fraud, we believe the refund process must be carefully balanced to ensure operators do not become unfunded insurance brokers for criminal syndicates. Furthermore, the proposed \$2,000 transaction limit in SB 2387 creates a dangerous data gap. Federal standards under the Bank Secrecy Act require Suspicious Activity Reports (SARs) at a \$2,000 threshold. By mandating a low overall limit, this bill inadvertently encourages scammers to operate below the federal reporting "tripwire," effectively blinding law enforcement to the very data needed to catch them. This limit does not stop determined criminals; it merely encourages "kiosk-shopping," which fragments data across multiple operators and makes it nearly impossible for agencies to track illicit activity.

Data consistently indicates that "new customers" are at the highest risk for social engineering and high-pressure scams. Conversely, existing customers understand our terms and have passed through our identity verification protocols. To address this, we recommend establishing a defined "new customer" window consisting of a 72-hour period where full refund requirements - contingent upon a verified law enforcement report - are focused on first-time users. We also recommend tiered transaction limits, aligning with standards seen in states like Nebraska, Minnesota, Colorado, Illinois, and Oklahoma - specifically a \$2,000 limit for new customers and a \$10,500 limit for existing customers. This ensures we deter scammers without eliminating access for legitimate users.

We have a proven track record of collaborating with state legislators, Attorneys General, Banking Commissions, and organizations such as the AARP to develop balanced regulatory frameworks. A prime example of this is our work with the AARP to craft a model bill that protects vulnerable consumers through targeted refund provisions and a tiered transaction structure—specifically, a \$2,500 limit for new customers and a \$10,500 limit for established, verified users.

Because this committee's goal is to ensure an effective bill, we respectfully ask for the opportunity to collaborate further with you and the sponsors. Bitcoin Depot wants to be part of the solution. We ask to work together on a comprehensive strategy that holds us to the same high standards as any other financial institution while maintaining the crucial on-ramps Hawaiians rely on.

Thank you for your time and for the opportunity to share our perspective today.

Sincerely,

Mike Geiselhart

Government Relations Manager

Bitcoin Depot

SB-2387

Submitted on: 2/3/2026 10:02:40 AM

Testimony for CPN on 2/6/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Warren Wong	Testifying for aarp	Support	Written Testimony Only

Comments:

AARP is requesting an amendment to clarify that the daily transaction is limited to \$2,000 and not to exceed \$10,000 over a 30 day period

SB-2387

Submitted on: 2/4/2026 7:21:12 PM

Testimony for CPN on 2/6/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
GARY SIMON	Testifying for Hawai'i Family Caregiver Coalition	Support	Written Testimony Only

Comments:

Dear Chair Keohokalole, Vice Chair Fukunaga, Honorable Members of the Senate Committee on Commerce and Consumer Protection, Chair Elefante, Vice Chair Lamosao, and Honorable Members of the Senate Committee on Labor and Technology.

I am Gary Simon, a member of the board of the Hawai'i Family Caregiver Coalition, whose mission is to improve the quality of life of those who give and receive care by increasing community awareness of caregiver issues through continuing advocacy, education, and training. I am offering testimony on behalf of the Hawai'i Family Caregiver Coalition.

The Hawai'i Family Caregiver Coalition strongly supports SB 2387, which establishes limits on transactions through digital financial asset transaction kiosks. SB 2387 also requires operators of digital financial asset transaction kiosks to use blockchain analytics and tracing software to prevent fraud; make certain disclosures; provide receipts to customers; provide full refunds under certain circumstances; and provide live customer service and a dedicated communications line for the Attorney General, Office of Consumer Protection, Department of Law Enforcement, and county police departments.

Cryptocurrency transactions come with many, real risks, including scams. Legislation is required to protect Hawai'i's residents from these cryptocurrency scams.

We urge you to protect Hawai'i's consumers and to recommend passage of SB 2387.

Mahalo for seriously considering the bill.

Gary Simon

Hawai'i Family Caregiver Coalition

Honolulu, Hawai'i

Email garysimon@hawaii.rr.com

Dear Chairs Keohokalole and Elefante and members of the Committees

Regarding S.B. 2387

Relating to Digital Financial Asset Transaction Kiosks

My name is Louise Pais, and I am the Chief Compliance Officer for Hilt Ventures, LLC (“Hilt”). On behalf of Hilt, I am respectfully testifying in opposition to this measure for the following reasons.

Hilt is a small crypto kiosk operator on the national level but is the largest crypto kiosk operator in the state of Hawaii. Hilt takes compliance and consumer protection very seriously. Hilt appreciates the interest in stopping customers from being scammed by bad actors. However, we believe this measure does not balance consumer protection against financial access or technological innovation for the following reasons:

1. Virtually 100% of scams occur with first time customers, not established customers. As such, a measure that requires a refund of the fiat amount and all fees should be targeted at first-time customers, not all customers. Several other states have enacted such first-time customer measures (e.g. Arizona’s Cryptocurrency Kiosk License Fraud Prevention Act and Colorado’s Vending of Digital Assets Bill), recognizing the vulnerability of first-time users of crypto kiosks to scams (e.g. older adults and those unfamiliar with digital assets, high-pressure, and "urgent" requests).
2. 90 days is a very long time for a customer to report they have been scammed. A more reasonable time period would be 30 or 60 days, which is more in line with legislation enacted in other states.
3. Most kiosks do not have the capability of providing a “paper” receipt, as these are internet transactions and printing paper receipts is environmentally unfriendly. Receipts are available on the kiosk screen (which the customer can take a photo of) and receipts are also texted to the customer’s phone number. An email receipt is also available to customers when requested.
4. The daily transaction limit for established customers is far too low. While first-time customer daily limits should be limited, established customers, who have been vetted and have continuously been subject to compliance reviews, should be free to transact at the operator’s established higher limits (e.g. Arizona and Colorado have \$2,000 daily limits for new customers and \$10,500 daily limits for established customers).

Hilt, like other legitimate kiosk operators have consumer protection safeguards to protect consumers and allow legitimate transactions.

Below are a sampling of the safeguards or safety measures used by Hilt Ventures as well as other legitimate operators who have consumer protection measures in place.

Consumer Protection safeguards

1. Require customer verification.
2. Actively monitor transactions to detect and report suspicious activity.
3. Put transaction limits on customers, including more restrictive limits for new customers and customers who are 60 and older.
4. Include mandatory warning prompts on several kiosk screens to customers.
5. Place holds or cool down periods for new customers, large amounts, and multiple transactions.
6. Maintain blacklisted wallet address and customer lists.
7. Prohibit the same digital wallet from being shared by customers.
8. Restrict a customer to use of a single phone number.
9. Verify the legitimate origin of money used in transactions to prevent money laundering and financial crime.
10. Brand kiosks with company logos to create a consistent, recognizable identity that makes impersonation difficult.
11. Clearly post a customer service number on the kiosk with representatives available during kiosk operating hours.
12. Feature multiple surveillance cameras at the kiosk to prevent fraud, deter crime, and record transactions.

Hilt is among the companies that care about consumer protection, but there are several parts of this bill that do not balance consumer protection against financial access or technological innovation.

Thank you for the opportunity to share the reasons we believe oppose this bill.

LATE



Testimony to the Senate Committee on Commerce & Consumer Protection and
Committee on Labor and Technology
Thursday, February 6, 2026, 10:00 AM
Conference Room 229

To: The Honorable Jarrett Keohokalole, Chair
The Honorable Brandon Elefante, Chair
The Honorable Carol Fukunaga, Vice-Chair
The Honorable Rachele Lamosao, Vice-Chair
Members of the Committees

My name is Stefanie Sakamoto, and I am testifying on behalf of the Hawaii Credit Union League (HCUL), the local trade association for 45 Hawaii credit unions, representing over 879,000 credit union members across the state.

HCUL offers the following testimony in support of SB 2387. This bill establishes limits on transactions through digital financial asset transaction kiosks and requires operators of digital financial asset transaction kiosks to use blockchain analytics and tracing software to prevent fraud

Credit unions prioritize the financial well-being and security of our members. As member-owned financial cooperatives, we are committed to ensuring consumer protection in financial transactions for our members. This bill aligns with these values by providing safeguards that protect from potential financial harm while maintaining access to emerging financial technologies.

Implementing a transaction cap aligns with best practices in financial regulation. Many other financial services, including cash withdrawals from traditional ATMs, are subject to daily limits to prevent large-scale fraud and ensure compliance with anti-money laundering regulations. By extending similar safeguards to digital asset transactions, Hawaii can maintain a balanced approach to financial innovation and consumer protection.

Thank you for the opportunity to provide comments on this important issue.

TESTIMONY ON S.B. 2387

RELATING TO DIGITAL FINANCIAL ASSET TRANSACTION KIOSKS

NOTICE OF HEARING

Friday, February 6, 2026

10:00 a.m.

Committee on Commerce and Consumer Protection and
Committee on Labor and Technology

Aloha Chairs Keohokalole and Elefante, Vice Chairs Fukunaga and Lamosao and members of the Committee on Commerce and Consumer Protection and Committee on Labor and Technology.

My name is Carol Wakayama and I wish to express my **STRONG SUPPORT** for S.B. 2387.

During 2025, I heard comments about cryptocurrency machines springing up in Hawaii. These machines are relatively new. There is a huge risk - especially to those with limited digital knowledge - that machine users could lose huge amounts of monies and potentially their life/retirement savings - to criminal fraudsters.

Over the past several decades, I have heard numerous stories of phone calls that are allegedly from law enforcement, attorneys or other individuals. These fraudsters/callers appear to have one thing in common.... They prey on someone's "tendency for concern" by either pretending to be someone they are not or having a traumatic story that frightens the listener into handing over monies. These fraudsters are predators.

Passage of S.B. 2387 could help provide some protection and safeguards to the consumer. For example, clearly worded signs that "warn users of potential financial risk"; how to contact law enforcement should the users suspect fraud and; setting a limit on daily transactions to an amount such as \$2,000. By increasing protections for machine users, I hope that cryptocurrency fraudsters will realize that Hawaii's residents are better protected/educated against fraud and may think twice before increasing the number of these machines in Hawaii. Thank you for your support of S.B. 2387.

Carol Wakayama
Punchbowl District

Greenwood Law Corp.

2070 Winamar Place,

Escondido CA 92029

February 3rd, 2026

The Thirty-Third State Legislature

Senate Committee on Commerce and Consumer Protection

Senate Committee on Labor and Technology

February 6th, 2026

Conference Room 229, 10.00 a.m.

To: The Honorable Jarrett Keohokalole, Chair

The Honorable Brandon J.C. Elefante, Chair

Re: Strong Support for S.B. 2387 Relating to Digital Financial Asset
Transaction Kiosks

Aloha Chair Keohokalole, Chair Elefante and Members of the Committees:

I am Paul Greenwood, CEO of Greenwood Law Corp. I have been an attorney for over 48 years during which time I was privileged to lead an Elder Protection Unit at the San Diego District Attorney's Office for 22 years. As part of that assignment I handled hundreds of elder fraud prosecutions, many of which were preventable. I now spend most of my post -prosecutorial time conducting elder fraud prevention seminars all over the country trying to help older adults avoid some of the pitfalls of victimization at the hands of skillful predators.

During the last seven years I have met many fraud victims who have had their hard earned life savings stripped from them, often within a matter of

hours. And unless a fraudulent transaction is reported to the authorities immediately, the opportunity to recover the stolen funds is severely limited.

I have learned that crypto currency is now the favored currency of fraudsters. And with the accessibility to crypto currency kiosks in gas stations, supermarkets and even hotels in Hawai'i, the scammers are able to direct a victim to such a kiosk typically within a 10 mile radius of the victim's residence.

That is why we need additional protections for your constituents in Hawai'i. S.B. 2387 goes a long way to redress the current imbalance – but I would also urge you to adopt the amendment put forth by AARP Hawaii in a letter from State Director Keali'i S. Lopez to your Committees.

Based upon my years of tackling criminals who target older and vulnerable adults, I am convinced that passage of S.B 2387 into law is both timely and necessary.

Sincerely,

A handwritten signature in black ink that reads "Paul R Greenwood". The signature is written in a cursive, flowing style.

Paul R Greenwood, Esq. CEO Greenwood Law Corp.

California State Bar # 156538

Deputy District Attorney San Diego – Retired

Member of the Kauai Elder Justice Multi Disciplinary Team

SENATE [COMMITTEE ON COMMERCE AND CONSUMER PROTECTION](#)

Senator Jarrett Keohokalole, Chair
Senator Carol Fukunaga, Vice Chair

SENATE [COMMITTEE ON LABOR AND TECHNOLOGY](#)

Senator Brandon J.C. Elefante, Chair
Senator Rachele Lamosao, Vice Chair

NOTICE OF HEARING

Friday, February 6, 2026, 10:00am

Re: SB 2387 RELATING TO DIGITAL FINANCIAL ASSET TRANSACTION KIOSKS.

Aloha Chairs Keohokalole and Elefante, and Vice Chairs Fukunaga and Lamosao. I am Linda Dorset and I am testifying in STRONG support of SB 2387 **which would establish critical safeguards for cryptocurrency transactions conducted through kiosks in Hawai'i and set a limit of \$2,000 or the equivalent in digital financial assets per day; or a limit of \$10,000 or the equivalent in digital financial assets in any thirty-day period.**

Cryptocurrency kiosks are rapidly expanding across our islands AND, many consumers who use kiosks do not realize they are converting cash into crypto assets that cannot be disputed, refunded, or traced once sent. Kupuna, especially, have been the victims of significant financial risk, fraud, and irreversible losses. These kiosks mirror traditional ATMs—but without the same protections.

Senate Bill 2387 is a reasonable, necessary, and consumer-focused response to these documented harms.

I respectfully urge you to PASS Senate Bill 2387. This measure reflects Hawai'i's values of fairness, and protection of our people, while allowing innovation and technology to move forward in a safe and responsible way.

Mahalo for your time, your consideration, and your commitment to protecting Hawai'i's consumers.

Linda Dorset
Maui Senior Citizen

February 6, 2026

TO: Chairs Elefante and Keohokalole and Committee Members
FROM: Carl Takamura
RE: SB 2387

Mahalo for the opportunity to submit this testimony in strong support of **SB 2387** which establishes commonsense regulations for cryptocurrency kiosks in Hawaii.

Law enforcement and consumer protection agencies have documented a sharp rise in fraud schemes that direct victims to deposit cash into cryptocurrency kiosks. These scams often target seniors, many of whom are unfamiliar with digital assets and are more vulnerable to high pressure tactics. Once funds are transferred through a kiosk, they are virtually impossible to recover and perpetrators – often operating outside of Hawaii – face little accountability.

This bill will bring cryptocurrency kiosks in line with basic consumer protections already required of other financial institutions. Hawaii should not continue to allow an unregulated cash-to-crypto pipeline that criminals can exploit with ease. Our kupuna deserve better safeguards and family's better peace of mind.

I urge you to approve this important proposal.

Respectfully,

Carl Takamura

Carl Takamura
Hawaii Kai

Testimony on Senate Bill 2387

RELATING TO Digital Financial Assets Transaction Kiosks

Aloha Chair Elefante and Keohokalole and Members of the
Committee

My name is Merle Minami-Shima, and in STRONG SUPPORT of
SB 2387 which would establish critical safeguards for
cryptocurrency transactions conducted through kiosks in
Hawai'i.

Kupuna are one of the most vulnerable segments of our
population. Most often they are very trusting and therefore
gullible to falling prey to unscrupulous people who take
advantage of their belief in others. They are easily tricked and
manipulated to convert monies into crypto at kiosks without
understanding the ramifications of their actions.

Crypto currency scams have caused many to lose a significant
portion of their savings when they can least afford to lose it.

I feel very strongly that it is our responsibility to protect our
kupuna and we can do this by PASSING Senate Bill 2387. I urge
your support in this matter.

Mahalo for your consideration of this very important matter.

Respectfully submitted,

Merle Minami-Shima

Wailuku, Maui, Hawaii

February 6, 2026

Committee on Commerce and Consumer Protection
Committee on Labor and Technology
State Capitol
415 South Beretania Street
Honolulu, HI 96813

TESTIMONY IN SUPPORT OF SB2387

Chairs Jarrett Keohokalole and Brandon J.C. Elefante, Vice Chairs Carol Fukunaga and Rachele Lamosao, and Committee Members:

I write to express my strong support for SB2387 and ask the Committee to pass it.

SB2387 concerns cryptocurrency kiosks, also known as cryptocurrency ATMs. These kiosks enable people to purchase cryptocurrency, like Bitcoin and others, using cash. Cash is fed into the machine to complete the purchase of cryptocurrency. The user of the kiosk can then send the cryptocurrency to themselves or others.

This Bill would create a daily transaction limit for users of cryptocurrency kiosks in Hawai'i. Why is this important? Because cryptocurrency kiosks are frequently used by scammers to take money from victims.

The story of the scam can take many forms—you owe the IRS; you need to pay off a bench warrant;¹ your bank account is compromised, and you have to protect your money by changing it to crypto; etc.—but the end goal for the scammer is the same: get the victim to a kiosk with cash, and tell them how to send it. This video shows what that looks like as it's happening: <https://youtu.be/lfHuSkQnBLk>.

Besides a general under-resourcing of law enforcement to combat cyber and financial crimes, cryptocurrency-involved crimes pose additional challenges to investigate. Transactions involving cryptocurrency can move quickly and are very difficult to trace, leaving the final destination of funds unknown. Even if the destination can be determined, scammers are frequently overseas, in countries where US-based law enforcement has little influence.²

¹ Angela Cifone, Scammers Posing as Police Pressuring Kupuna to Send Thousands of Dollars, KITV (Jan. 31, 2026), https://www.kitv.com/news/crime/scammers-posing-as-police-pressuring-kupuna-to-send-thousands-of-dollars/article_10aac682-3335-4804-898d-64f868aa2c9c.html.

² For example, a large scam compound called KK Park was located in Myanmar. See Lewis Sanders IV et al., How Chinese Mafia Are Running a Scam Factory in Myanmar, DW (Jan. 30, 2024), <https://www.dw.com/en/how-chinese-mafia-are-running-a-scam-factory-in-myanmar/a-68113480>; Koh Ewe, How a Viral Post Saved a Chinese Actor From Myanmar's Scam Centres, BBC (Jan. 9, 2024),

The speed at which transactions can occur and the challenges to tracing where funds end up are why reports by kiosk companies to the US Treasury Department's Financial Crimes Enforcement Network ("FinCEN") are not a sufficient safeguard. Such reports do not prevent a victim's money, once put into a cryptocurrency kiosk, from swiftly disappearing down a path of untraceable transactions to a country or region where law enforcement cannot follow.

If, instead of putting \$20,000, \$30,000, or \$50,000 into a cryptocurrency kiosk during one visit, victims could only put in \$2,000 total per day, that hard limit would severely restrict how lucrative Hawai'i victims would be for scammers.

To that end, I recommend the following amendment to make clear that the proposed limits work in conjunction as opposed to in the alternative. Line 5-11: replaced in its entirety with the following:

a) An operator shall not accept transactions from a single customer of more than \$2,000 in U.S. dollars or the equivalent in digital financial assets per day through a digital financial asset transaction kiosk. In addition, the transaction limit shall not exceed \$10,000 in U.S. dollars or the equivalent in digital financial assets in any thirty (30) day period.

I urge the Committee to pass SB2387 with the recommended amendment and to ask their colleagues to do the same.

Thank you for the opportunity to be heard on this important Bill.

Thomas J. Michener, Esq.

<https://www.bbc.com/news/articles/cd60611407no>; see also LastWeekTonight, *Pig Butchering Scams: Last Week Tonight with John Oliver (HBO)*, YouTube (Feb. 22, 2025), <https://www.youtube.com/watch?v=pLPpl2ISKTg>.

Testimony on Senate Bill No. 2387
RELATING TO DIGITAL FINANCIAL ASSETS
Friday, February 6, 2026, at 10:00 am
Conference Room 229 & Videoconference
State Capitol
415 South Beretania Street

Aloha Chair Elefante and Members of the Committee:

My name is Christina Enoka, and I am in STRONG SUPPORT of SB 2387 which would set up critical safeguards for cryptocurrency transactions conducted through kiosks in Hawaii.

Cryptocurrency fraud is on the rise, and the kiosks offer a simple opportunity to launder funds and/or defraud unsuspecting victims. Safeguards must be in place to reduce significant financial risk to the consumer, especially our kupuna.

Mahalo for the opportunity to testify!

Christina Enoka
Mililani, Oahu
Ncsmn150@gmail.com

TO: The Honorable, Senator Jarrett Keohokalole, Chair and
The Honorable, Senator Carol Fukunaga, Vice-Chair
and Members of the Senate Committee on Consumer Protection, and
The Honorable Senator Brandon J.C.Elefante, Chair and
The Honorable Senator Rachele Lamosao, Vice-Chair
And Members of the Senate Committee on Labor and Technology

Date: Friday, February 6, 2026

Re: Senate Bill 2387. Relating to Digital Financial Asset Transaction Kiosks

My name is Esther Ueda, and I am writing in STRONG SUPPORT of Senate Bill 2387.

The proposed bill would place limits on financial transactions made through a digital financial asset transaction kiosk in one day, similar to the practice of placing limits on withdrawals made by financial institutions on their cashtel machines. The proposed limit would be \$2,000 per day or a limit of \$10,000 in digital assets in any thirty-day period.

Numerous cryptocurrency type machines have appeared throughout the State. Some of these machines have been used for fraudulent purposes, particularly targeting vulnerable Seniors.

The proposed transaction limits, and other proposed measures in the bill, such as posting warning signs, providing possible refunds for fraudulent transactions, providing contact information for reporting frauds, providing live customer service to persons using the machines, would assist in stopping or at least deterring activities using these machines for fraudulent purposes.

Please support Senate Bill No. 2387.

Esther Ueda,
Pearl City, Hawaii



SB-2387

Submitted on: 2/5/2026 9:38:00 PM
Testimony for CPN on 2/6/2026 10:00:00 AM

Submitted By	Organization	Testifier Position	Testify
Dan Gardner	Individual	Support	Written Testimony Only

Comments:

Chair Elefante and Keohokalole and Members of the Committees

I am Dan Gardner and my wife Deborah and I are in strong support of SB 2387 that would establish much needed safeguards for cryptocurrency transactions conducted through ATM-like Kiosks in Hawaii. Sadly, while ATMs are normally used to obtain cash, Crypto kiosks are being used by clever scammers to fraudulently take hard earned savings dollars from poorly informed unfortunate citizens and sadly by an even greater proportion of seniors. The number of people being scammed this way has been growing yearly with 68 reported losses in 2024 totaling over \$920,00. Many more losses are likely as folks are embarrassed to report their mistakes. Once cash is converted to crpto assets people's money vanishes for good. These losses must be stopped and SB 2387 takes a number of very reasonable steps to better inform potential users and reverse this tragic trend. We respectfully ask you to pass SB 2387. It will help protect our seniors and ensure technology goes ahead in a more safe and responsible manner.