



6220 America Center Drive, Suite 100, San Jose, CA 95002

August 7, 2026

The Honorable John B. McCuskey
Attorney General
State of West Virginia
State Capitol Complex
Charleston, WV 25305

Re: July 27, 2026 Letter Regarding W. Va. Code § 5A-14-1 et seq.

Dear Attorney General McCuskey:

Thank you for your July 27 letter regarding Kent Cartridge Company.

Since receiving your letter, we have been in communication with Kent Cartridge and can confirm that it has completed our application process and has been approved as a BILL customer. It is not our policy or practice to categorically deny as customers companies engaged in the lawful commerce of firearms, firearms accessories, or ammunition products. BILL has updated its Acceptable Use Policy to avoid any confusion on this point going forward. We welcome Kent Cartridge as a new BILL customer, which is the right outcome for a lawful West Virginia business.

We would note that we do evaluate all potential new customers, irrespective of industry, on an individual, customer-specific basis against compliance, credit and fraud risk-based criteria and may, from time-to-time, refuse to accept as customers entities that fail to satisfy these criteria. We would also note for completeness that we do not believe BILL is a "financial institution" within the meaning of W. Va. Code § 5A-14-2(4), including subsection (D). We raise this only so our response is not mistaken for agreement on the statute's scope, and BILL reserves its positions and defenses in full.

Please direct any follow-up questions or concerns you may have to me.

Sincerely,

Michael Dunn

Michael Dunn
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cc: Zachary A. Viglianco, Director of Strategic Litigation
René Lacerte, Chief Executive Officer, BILL Holdings, Inc.
Deborah Daniloff, Sr. Director, Head of Commercial Litigation, BILL Holdings, Inc.