State of West Virginia
Office of the Attorney General

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July 27, 2026

Eric Glyman & Karim Atiyeh
Co-CEOs
Ramp Business Corporation
28 West 23rd Street, Floor 2
New York, NY 10010

Dear Messrs. Glyman & Atiyeh:

It has recently come to our attention that your company, Ramp, may have engaged in behavior that violates West Virginia's Firearms Industry Nondiscrimination (FIND) Act, W. Va. Code § 5A-14-1 *et seq*. This letter serves two purposes. *First*, it is an invitation to immediately stop violating West Virginia law and to take appropriate ameliorative action for any prior or ongoing violations. *Second*, this letter places you on notice of the consequences of continuing to engage in behavior of this sort. We hope the first purpose will render the second superfluous.

Your potential violation of the FIND Act stems from your refusal to provide payment processing services to Kent Cartridge Company, a West Virginia business whose factory in Kearneysville has produced premium, environmentally friendly ammunition for more than 30 years. According to your company's "Prohibited Activities" list, businesses that are primarily engaged in the "production, sale, or distribution" of "guns, accessories, ammunition, or other weapons" are "prohibited from using Services provided by Ramp."[1] It appears Ramp acted upon this policy when it informed Kent Cartridge, via an email sent June 30, 2026, that it would "love to work with" Kent but, "unfortunately," could not "due to restrictions" from Ramp's unnamed "partners."[2]

A refusal of that sort—predicated solely and entirely on a business's manufacture or distribution, or other lawful commerce in, firearms—would infringe West Virginia's FIND Act. Section 5A-14-5 makes clear that West Virginia law prohibits financial institutions from "discriminat[ing] against a firearm entity … because th[at] firearm entity … supports or is engaged in the lawful commerce of firearms, firearm accessories, or ammunition products." W. Va. Code § 5A-14-5(a). The Act further permits either an injured private party *or* the Attorney General to "file

[1] Prohibited Activities List, Ramp.com (June 10, 2025), *archived at* https://perma.cc/LJ34-DQQR.

[2] Email correspondence *archived at* https://perma.cc/9Y22-5VD3.

a civil action" against a financial institution that has engaged in discriminatory behavior and authorizes courts to award appropriate relief. *Id*. at 5A-14-6. Appropriate relief can include compensatory damages, punitive damages, and injunctive or declaratory relief. *Id*. Prevailing private parties are also entitled to attorneys' fees. *Id*. at (a). Furthermore, the Attorney General is obliged to "submit the name of any financial institution that has violated this article to the Governor and request that the state terminate any business relationship with the financial institution in a commercially reasonable manner." *Id*. at (c).

It is likely that, for purposes of the FIND Act, Ramp qualifies as a "financial institution" subject to West Virginia's nondiscrimination mandate. The Act defines "financial institution" to include "commercial bank[s]." W. Va. Code § 5A-14-2(4)(B). Ramp advertises providing "business banking" services, including "business checking" and "investment accounts," as well as promoting "FDIC protection" and the accrual of interest on depositors' "operating balance."[3] These are strong indicators that Ramp is engaged in the business of banking. *See generally Engel v. O'Malley*, 219 U.S. 128, 136 (1911) (a business that receives "money for safe-keeping" is involved in "the banking business"). *Cf.* W. Va. Code §§ 31A-1-2(e); 31A-4-2; 31A-5-1. And even if Ramp does not *itself* qualify as a financial institution, both the services it provides and its unambiguous statements establish that Ramp is, at a minimum, partnering with entities that undeniably do.[4]

It is also likely that Ramp's refusal to serve Kent Cartridge falls within the FIND Act's sweep. The Act expressly provides that "discriminat[ion] against a firearm entity" includes the refusal to "provide or engage in services with [an] entity … based on its status as a firearm entity." W. Va. Code § 5A-14-2(3). Nothing in the correspondence we have reviewed suggests that Ramp declined to serve Kent Cartridge for a legitimate business reason, such as financial insolvency or involvement in criminal activity. On the contrary, it is evident that Ramp's refusal to provide service was predicated on the nature of the "lawful products and services provided by" Kent. *Id*.

Discrimination of this sort is not countenanced by West Virginia law—that is the manifest purpose of the FIND Act. Ramp claims to serve more than 70,000 clients;[5] if even one of them is

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[3] Business Banking, Ramp.com, *archived at* https://perma.cc/WUN3-L9SA.

[4] We are aware that Ramp sometimes proclaims that it is a "financial technology company … not a bank." *See* n.3, *supra*; *but see* n. 5, *infra* (declaring that Ramp handles "cards, expenses, bill payments, and *banking* – in the blink of AI") (emphasis added). Given the nature of the services it provides, we are skeptical that Ramp falls outside the FIND Act's ambit because Ramp is facilitating the "most essential function of a bank"—the "receipt of deposits"—and therefore is engaged in the "'substance of the business of a banker.'" *Morris v. Marshall*, 172 W. Va. 405, 410 (1983) (quoting *Warren v. Shook*, 91 U.S. 704, 710 (1875)). It is also unlikely that the West Virginia Legislature intended to allow companies like Ramp to evade the FIND Act merely by partnering with a traditional banking institution and then disclaiming the applicability of West Virginia's banking regulations. That said, even if Ramp is not a "commercial bank" covered by the Act, the services it advertises and provides to clients are *banking services*. Thus, to the extent Ramp's discrimination flowed from or was dictated by the policies of one of its partner banks, *that institution* is likely violating the FIND Act.

[5] *See* Ramp, The corporate card that works for you, LinkedIn (Jun. 10, 2026), *archived at* https://perma.cc/6JNT-ATNG; *see also* Ramp Brings Stablecoin Accounts and Payments to All Customers, PR Newswire (July 21, 2026), *archived at* https://perma.cc/G792-LNGM.

a West Virginia state government agency or a West Virginia political subdivision, Ramp's open discrimination against Kent Cartridge is legally actionable. W. Va. Code § 5A-14-5(a). Our Office has contacted the West Virginia State Auditor and State Treasurer to determine if any qualifying contracts with Ramp are in force; if so, this Office is prepared, absent corrective action, to initiate legal proceedings. And even if Ramp currently has no West Virginia government clients, its discriminatory treatment of Kent Cartridge—unless and until remedied—forecloses any *future* business relationship between Ramp and the State or its political subdivisions. *Id*.

That discrimination also jeopardizes Ramp's ability to enter into business relationships in, and may expose Ramp to liability under the laws of, the twelve other States that have (to date) enacted statutes prohibiting discrimination of this sort.[6] Several other States have recently considered or are currently considering enactment of a FIND Act or similar legislation.[7] And at least two bills that would enact a federal version quite similar to West Virginia's law have recently been proposed in Congress.[8]

Finally, it is important to note that the remedies provided by the FIND Act are not exclusive. We are thoroughly investigating this situation (and those like it) and will not hesitate to pursue other potential causes of action (e.g., violations of the West Virginia Consumer Credit and Protection Act and/or West Virginia's Antitrust Act) that may be uncovered during our investigation. Coordinated action or deceptive trade practices intended to hinder West Virginians' ability to exercise their right to bear arms will not be tolerated by this Office. Of course, it would be easy for Ramp to minimize its potential legal exposure; the need to pursue proactive legal remedies against an entity is significantly reduced once that entity has ceased engaging in discriminatory behavior.

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The bottom-line takeaway here should be crystal clear. West Virginians cherish the right to bear arms. And their elected representatives have enshrined into law protection against discrimination aimed at firearms manufacturers, distributors, and retailers by banks and other financial institutions. Accordingly, this Office will zealously investigate—and, when warranted, pursue legal action—to effectuate that protection and vindicate the policy choice West Virginians have made. That choice reflects an obvious desire that their fundamental right to bear arms not be unduly burdened or inhibited.

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[6] *See* Ala. Code § 41-16-160 *et seq*.; Ark. Code Ann. § 25-1-1102; Fla. Stat. §§ 560.1115(2)(d)(4), 655.0323(2)(d)(4); O.C.G.A. § 10-1-439 *et seq.*; Idaho Code Ann. § 67-2347A(1)(b); La. R.S. §§ 38:2216.1, 39:1602.2; Mont. Code Ann. § 30-20-301; 21 O.S. § 1289.31; Tenn. Code Ann. § 45-1-128(c)(4)(D); Tex. Gov't Code Ann. § 2274.001 *et seq.*; Utah Code §§ 13-66-101, 201; Wyo. Stat. Ann. § 13-10-301 *et seq*.

[7] *See*, *e.g.*, SCR 1007, 2nd Reg. Sess. (Ariz. 2024); S.B. 2741, Reg. Sess. (Miss. 2026); L.B. 687, 109th Leg., 1st Sess. (Neb. 2025); H.B. 359, Reg. Sess. (N.H. 2025); H.R. 919, Reg. Sess. (N.C. 2025); H. 4466, Reg. Sess. (S.C. 2025); H.D. 2073, Reg. Sess. (Va. 2025).

[8] *See* Firearm Industry Non-Discrimination Act, H.R. 45, 119th Congress (2025); Firearm Industry Non-Discrimination Act, S. 137, 119th Congress (2025).

We hope legal action is not necessary here; it need not be. Ramp can obviate the need for any action by removing lawful commerce in firearms and ammunition from its “Prohibited Activities” list, ending any partnerships with other financial institutions that discriminate against firearms commerce, and making things right with Kent Cartridge. That said, if Ramp—or its partners—continue to discriminate against West Virginia firearms manufacturers, we will pursue all appropriate actions authorized by law.

Sincerely,

John B. McCuskey
Attorney General

Zachary A. Viglianco
Director of Strategic Litigation

cc: Scott Bulua, General Counsel