

## **FTX.US Regulation and Licensure Information**

West Realm Shires Services Inc. ("FTX US") is generally regulated on both the Federal and State level and the primary regulatory compliance obligations are within the United States. FTX US is required to comply with many financial services and consumer protection laws. On the Federal level, the primary concern is anti-money laundering controls, and proper implementation of FTX US's policies and procedures to deter such activity. FTX US is registered as a Money Services Business with FinCEN - MSB Registration Number: 31000195443783. As an MSB, FTX US is compliant with the requirements of the Bank Secrecy Act (BSA). On the State level, the primary issues arise around consumer protection and money transmission laws. FTX US is currently applying to obtain money transmitter licenses from multiple States within the United States. FTX US maintains a policy of attempting to broadly disclose to consumers all applicable risks of the service.

FTX US has successfully received a US GAAP financial audit.

FTX US monitors both Federal and State level developments with its outside legal counsel, Fenwick & West LLP. FTX US has worked closely with Fenwick & West LLP on the development of its BSA program, as well as documentation and compliance assessments.

FTX US Derivatives (formerly LedgerX) is a U.S. federally regulated commodity derivatives exchange and clearinghouse. FTX US Derivatives holds three licenses with the U.S. Commodity Futures Trading Commission (CFTC):

Derivatives Clearing Organization (DCO)  
Designated Contract Market (DCM)  
Swap Execution Facility (SEF)

These licenses enable us to operate our exchange and clearinghouse in all 50 states in the US (including its territories), with access to certain international jurisdictions.

FTX US Derivatives follows an extensive audit program, which includes but is not limited to the following audits:

- Anti Money Laundering (AML): Annually, we conduct a full analysis and review of our OFAC (Office of Foreign Assets Control) procedures and AML processes, strategy, policy, controls and related technologies.
- Financial Condition: Annually, Grant Thornton LLP audits the financial condition of FTX US Derivatives, and in all past years, has expressed an unqualified opinion (i.e., clean bill of health) that our financial statements were presented fairly, in all material respects, in accordance with US GAAP accounting principles.
- Digital Asset Custody: Because we custody digital assets on behalf of our clients, Grant Thornton LLP conducts an annual review of how we hold digital assets from a security and key controls perspective.
- Penetration Testing: We contract with independent outside vendors to perform at-least-annual penetration tests that evaluate the effectiveness of our existing security controls.
- Vulnerability Scans: We run regular systems vulnerability scans on at least a quarterly basis, and

more frequently where possible.

- Key Controls: We conduct key controls tests at regular intervals to assess the effectiveness of the oversight mechanisms related to our key internal processes. In the past, these controls tests having included a SOC I Type II Audit (conducted by Friedman LLP) and a SANS CSC Top 20 audit.

- Federal Regulatory Examinations: Each year, the CFTC examines one aspect of our operations with a special emphasis, such as system safeguards, market surveillance or financial controls.

## License Information

FTX US is licensed in the following US Jurisdictions:

State	License	Agency
Alabama	Money Transmitter License, 864	Alabama Securities Commission RSA Dexter Avenue Building 445 Dexter Avenue Suite 12000 Montgomery, AL 36104
Alaska	Money Transmitter License, AKMT-015575	Alaska Department of Commerce, Community & Economic Development P.O. Box 110807 Juneau, AK 99811-0807
Arizona	Money Transmitter License, 1031184	Arizona Department of Financial Institutions 100 N. 15th Avenue, Suite 261 Phoenix, AZ 85007
<a href="#">Arkansas</a>	Money Transmitter License, 125979	Arkansas Securities Department #1 Commerce Way, Suite 402 Little Rock, Arkansas 72202
Connecticut	Money Transmission License, MT-1957771	Connecticut Department of Banking 260 Constitution Plaza Hartford, CT 06103-1800
Delaware	Check Seller, Money Transmitter License, 036400	Office of the State Bank Commissioner 1110 Forrest Avenue Dover, DE 19904
<a href="#">District of Columbia</a>	Money Transmitter License, MTR1957771	District of Columbia Department of Insurance, Securities and Banking 1050 First Street, NE, 801, Washington, DC 20002
<a href="#">Florida</a>	Money Services Business Part II, FT230000359	Florida Office of Financial Regulation 101 E. Gaines Street Tallahassee, FL 32399
<a href="#">Georgia</a>	Seller of Payment Instruments License, 1957771	Georgia Department of Banking and Finance Money Services Businesses 2990 Brandywine Road, Suite 200 Atlanta, GA 30341-5565

Idaho	Money Transmitters, MTL - 299	Idaho Department of Finance 800 Park Blvd, Suite 200 Boise, ID 83712 208-332-8000
Illinois	Money Transmitter License, MT.0000426	Illinois Department of Financial and Professional Regulation 320 West Washington Street, 3rd Floor Springfield, Illinois 62786
Iowa	Money Services License, 2021-0192	State of Iowa Division of Banking 200 E. Grand Avenue, Suite 300 Des Moines, IA 50309
Kentucky	Money Transmitter License, SC737812	Kentucky Department of Financial Institutions 1025 Capital Center Drive, Suite 200 Frankfort, KY 40601
Maine	Money Transmitter License	Department of Professional & Financial Regulation Bureau of Consumer Credit Protection 76 Northern Avenue Gardiner, Maine 04345
<a href="#">Maryland</a>	Money Transmitter License	Office of the Commissioner of Financial Regulation 500 N. Calvert Street, Suite 402 Baltimore, Maryland 21202
Michigan	Money Transmitter License, MT0023864	Michigan Department of Insurance and Financial Institutions PO Box 30220 Lansing MI 48909-7720
Minnesota	Money Transmitter License, MN-MT-1957771	Minnesota Department of Commerce 85 7th Place East, Suite 280 Saint Paul, MN 55101
<a href="#">Mississippi</a>	Money Transmitter License, 1957771	Mississippi Department of Banking and Consumer Finance Post Office Box 12129 Jackson, MS 39236
Missouri	Sale of Checks and Money Transmitter License, MO-22-9038	Missouri Division of Finance Truman State Office Building Room 630 Jefferson City, MO 65102
New Hampshire	Money Transmitter License, 24489-MT	New Hampshire Banking Department 53 Regional Drive, Suite 200 Concord NH 03301
New Mexico	Money Transmission License	New Mexico Financial Institution Division Money Services Business Unit

		P.O. Box 25101 Santa Fe, NM 87504
North Dakota	Money Transmitter License, MT103940	North Dakota Department of Financial Institutions 1200 Memorial Highway Bismarck, ND 58504
Oklahoma	Money Transmission License	Oklahoma Banking Department 2900 North Lincoln Boulevard Oklahoma City, Oklahoma 73105
Oregon	Money Transmitter License	Oregon Department of Consumer and Business Services 350 Winter Street NE P.O. Box 14480 Salem, OR 97309-0405
Pennsylvania	Money Transmitter License, 93683	Pennsylvania Department of Banking and Securities Market Square Plaza 17 N. Second Street, Suite 1300 Harrisburg, PA 17101
Puerto Rico	Money Transmitter License, 93683	Pennsylvania Department of Banking and Securities Market Square Plaza 17 N. Second Street, Suite 1300 Harrisburg, PA 17101
Rhode Island	Currency Transmitter, 20224304CT	State of Rhode Island Department of Business Regulation 1511 Pontiac Avenue Cranston, RI 02920
South Carolina	Money Transmitter License	Office of the Attorney General Attention: Money Services Division PO Box 11549 Columbia, SC 29211-1549
South Dakota	Money Transmitter License, 1957771.MT	South Dakota Department of Labor and Regulation 123 W. Missouri Ave. Pierre, SD 57501-0405
<a href="#">Washington</a>	Money Transmitter License, 550-MT-123611	State of Washington – Dept. of Financial Institutions Division of Consumer Services P.O. Box 41200 Olympia, Washington 98504-1200
West Virginia	Money Transmitter License, WVMT-1957771	West Virginia Division of Financial Institutions 900 Pennsylvania Avenue Suite 306 Charleston, WV 25302

## **Consumer Disclosures**

### [NMLS Consumer Access](#)

#### **Alaska**

**Please note that this license does not cover the transmission of virtual currency.**

For Alaska Residents Only:

If your issue is unresolved by West Realm Shires Services Inc. DBA FTX US & (510) 319-7213, please submit formal complaints with the State of Alaska, Division of Banking & Securities.

Please download the form

here: <https://www.commerce.alaska.gov/web/portals/3/pub/DBSGeneralComplaintFormupdated.pdf>

Submit formal complaint form with supporting documents:

Division of Banking & Securities PO Box 110807 Juneau, AK 99811-0807

If you are an Alaska resident with questions regarding formal complaints, please email us at [dbs.licensing@alaska.gov](mailto:dbs.licensing@alaska.gov) or call Nine Zero Seven Four Six Five Two Five Two One

#### **Arizona**

If you have a complaint, please contact West Realm Shires Services Inc. DBA FTX US at (510) 319-7213 and/or [support@ftx.us](mailto:support@ftx.us). If you still have an unresolved complaint regarding West Realm Shires Services Inc. DBA FTX US money transmission activity, you may mail, email, or fax written complaints to the:

Arizona Department of Financial Institutions, Consumer Affairs Division

100 N. 15th Street, Suite 261 Phoenix, AZ 85007

E-mail: [financial.consumers@difi.az.gov](mailto:financial.consumers@difi.az.gov)

Facsimile: 602-381-1225

#### **AZ e-Licensing Portal for filing a complaint**

AZDFI Consumer Complaint Portal: [https://elicense.az.gov/ARDC\\_FileComplaint](https://elicense.az.gov/ARDC_FileComplaint)

## **Arkansas**

If you have a complaint, please contact West Realm Shires Services Inc. DBA FTX US at (510) 319-7213 and/or [support@ftx.us](mailto:support@ftx.us).. If you still have an unresolved complaint regarding West Realm Shires Services Inc. DBA FTX US money transmission activity, you may file the completed complaint form by emailing to

ASDInfo@securities.arkansas.gov or by mailing at:

1 COMMERCE WAY, SUITE 402

LITTLE ROCK, ARKANSAS 72202

TELEPHONE: (501) 324-9260

FACSIMILE: (501) 324-9268

[http://www.securities.arkansas.gov!/userfiles/ComplaintForm-english%20May%202020\(3\).pdf](http://www.securities.arkansas.gov!/userfiles/ComplaintForm-english%20May%202020(3).pdf)

Important Notice from AR Securities Department about Consumer Complaint

[http://www.securities.arkansas.gov!/userfiles/Complaint%20Important%20Notice%20May%202020\(2\).pdf](http://www.securities.arkansas.gov!/userfiles/Complaint%20Important%20Notice%20May%202020(2).pdf)

*[... Initial complaints should be made in writing directly to the entity or individual with whom you have experienced the problem. It is a good idea to indicate on your complaint letter that you are sending a copy to the Arkansas Securities Department. If your problem is not resolved timely by the entity or individual, you are encouraged to complete a Complaint Form and send it to the Department....]*

## **District of Columbia**

If you have a complaint, please contact West Realm Shires Services Inc. DBA FTX US at (510) 319-7213 and [support@ftx.us](mailto:support@ftx.us).. If you still have an unresolved complaint regarding West Realm Shires Services Inc. DBA FTX US money transmission activity, you may file it by contacting the Department at:

### **District of Columbia Department of Insurance, Securities and Banking**

If you have a complaint, please contact West Realm Shires Services Inc. DBA FTX US at (510) 319-7213 and/or [support@ftx.us](mailto:support@ftx.us).. If you still have an unresolved complaint regarding West Realm Shires Services Inc. DBA FTX US money transmission activity, you may file it by contacting the Department at:

## **District of Columbia Department of Insurance, Securities and Banking**

1050 First St., NE, Suite 801

Washington, DC 20002

Phone: (202) 727-8000

Fax: (202) 354-1085

E-mail: [disbcomplaints@dc.gov](mailto:disbcomplaints@dc.gov)

[Consumer Complaint Form Mail-in Version](#)

### **Florida**

If you have a complaint, please contact West Realm Shires Services Inc. DBA FTX US at (510) 319-7213 and/or [support@ftx.us](mailto:support@ftx.us). If you still have an unresolved complaint regarding West Realm Shires Services Inc. DBA FTX US money transmission activity, you may file it by contacting the Florida Office of Financial Regulation at:

Online: <https://www.flofr.com/sitepages/FileAComplaint.htm>. In order to file your complaint, you will need to register electronically through Online Services. A valid email address is required.

**NOTE:** Consumers are encouraged to file their complaints online. If you are unable to file online, please download and mail a completed paper form. Under Florida law, e-mail addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to the Office. Instead, contact this office by phone or in writing. Communications with this office, regardless of the form or means of transmission, are subject to disclosure under Florida's public records law.

[Download Consumer Complaint Form](#)

### **Florida Office of Financial Regulation - Consumer Finance**

200 E. Gaines Street, Tallahassee, FL 32399-0376

850-487-9687

### **Georgia**

Licensed by The Georgia Department of Banking and Finance. (Lic. # 1957771/ NMLS# 1957771).

The Georgia Department of Banking and Finance - Consumer Resources: File a Complaint. We do not intervene in disputes between consumers and financial service providers, but we do use complaint information in the regulatory process. To file a complaint with the regulators, you may

securely do so with the Consumer Financial Protection Bureau, an agency of the federal government, at <http://www.consumerfinance.gov/complaint/> (links off-site) or by telephone at (855) 411-2372.

## **Illinois**

Illinois Division of Banking

If you have a complaint, please contact West Realm Shires Services Inc. DBA FTX US at (510) 319-7213 and/or [support@ftx.us](mailto:support@ftx.us). If you still have an unresolved complaint regarding West Realm Shires Services Inc. money transmission activity, you may file it by contacting the Illinois Division of Banking at:

### **Illinois Department of Financial and Professional Regulation**

320 West Washington Street, 3rd Floor

Springfield, IL 62786

Complaint Intake Unit: 1-312-814-6910

Toll-Free Number: 1-888-473-4858

## **Maryland**

Maryland Commissioner of Financial Regulation

The Commissioner of Financial Regulation for the State of Maryland will accept all questions or complaints from Maryland residents regarding West Realm Shires Services Inc. DBA FTX US, NMLS ID # 1957771 at:

Commissioner of Financial Regulation

500 North Calvert Street, Suite 402

Baltimore, Maryland 21202

Attention: Consumer Services Unit

Toll Free at (888) 784-0136

[Download Consumer Complaint Form](#)



## Mississippi

The Mississippi Department of Banking & Consumer Finance recommends that you attempt to resolve your complaint with the financial institution first by contacting West Realm Shires Services Inc. DBA FTX US at (510) 319-7213 and/or [support@ftx.us](mailto:support@ftx.us) to allow the opportunity to resolve the issue(s). If you still have an unresolved complaint regarding West Realm Shires Services Inc. DBA FTX US money transmission activity, you may file your complaint online at <https://dbcf.ms.gov/complaint-form>.

## Washington

Washington Division of Consumer Services

If you have a complaint, please contact West Realm Shires Services Inc. DBA FTX US at (510) 319-7213 and/or [support@ftx.us](mailto:support@ftx.us). If you still have an unresolved complaint regarding West Realm Shires Services Inc. DBA FTX US money transmission activity, you may file it by contacting the Washington Division of Consumer Services at:

Department of Financial Institutions

Division of Consumer Services

P.O. Box 41200

Olympia, Washington 98504-1200

Online: <https://dfi.wa.gov/file-complaint>

Mail or fax: <https://dfi.wa.gov/sites/default/files/money-services-complaint.pdf>

Call: (360) 902-8703 or 1-877-RING DFI (1-877-746-4334)

TDD (360) 664-8126

FAX (360) 596-3868

Email: [CSEnforceComplaints@dfi.wa.gov](mailto:CSEnforceComplaints@dfi.wa.gov)

## Hotline

If you suspect fraudulent activity on your account, please contact West Realm Shires Services Inc. DBA FTX US at (866) 481-1008 or [support@ftx.us](mailto:support@ftx.us).