

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
Arizona	Money Transmitter License, 1031184	Arizona Department of Financial Institutions 100 N. 15th Avenue, Suite 261 Phoenix, AZ 85007
Arkansas	Money Transmitter License, 125979	Arkansas Securities Department #1 Commerce Way, Suite 402 Little Rock, Arkansas 72202
Colorado	Money Transmitters License, 500298	Colorado Division of Banking 1560 Broadway, Suite 975 Denver, CO 80202
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
District of Columbia	Money Transmitter License, MTR1957771	District of Columbia Department of Insurance, Securities and Banking 1050 First Street, NE, 801, Washington, DC 20002
Florida	Money Services Business Part II, FT230000359	Florida Office of Financial Regulation 101 E. Gaines Street Tallahassee, FL 32399
Georgia	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
Kansas	Money Transmitter License, MT.0000218	Kansas Office of the State Bank Commissioner 700 SW Jackson St, Suite 300 Topeka, KS 66603
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
Maryland	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
Mississippi	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
Nebraska	Money Transmitter License,	Nebraska Department of Banking and Finance PO Box 95006 1526 K St #300 Lincoln, NE 68508

New Hampshire	Money Transmitter License, 24489-MT	New Hampshire Banking Department 53 Regional Drive, Suite 200 Concord NH 03301
New Jersey	Money Transmitter, 2105089 C22	NJ Department of Banking and Insurance 20 West State Street PO Box 325 Trenton, NJ 08625
New Mexico	Money Transmission License	New Mexico Financial Institution Division Money Services Business Unit P.O. Box 25101 Santa Fe, NM 87504
North Carolina	Money Transmitter License, 204217	North Carolina Commissioner of Banks 316 W. Edenton Street Raleigh, NC 27603
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, TM-129	Puerto Rico Bureau of Financial Institutions Office of the Commissioner of Financial Institutions 1492 Ponce de León Avenue, Suite 600 Centro Europa Building San Juan, PR 00907
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
Utah	Money Transmitter License, 210	Utah Department of Financial Institutions 324 South State Street, Suite 201 Salt Lake City, Utah 84111

Vermont	Money Transmitter, MT-1957771 Money Transmitter License - Other Trade Name #1, MT-1957771-1	Department of Financial Regulation Consumer Services 89 Main Street Montpelier, VT 05620 - 3101
Washington	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
Wisconsin	Seller of Checks, 220-SOC	Wisconsin Department of Financial Institutions 4822 Madison Yards Way, North Tower Madison, WI 53705
Wyoming	Money Transmitter License, 7296	Wyoming Department of Audit Hathaway Building 2nd Floor 2300 Capitol Ave. Cheyenne, WY 82002

Consumer Disclosures

NMLS Consumer Access

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. 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

Facsimile: 602-381-1225

[AZ e-Licensing Portal for filing a complaint](#)

AZDFI Consumer Complaint Portal: 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. 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....]

Colorado

Colorado 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. 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 Colorado Division of Banking.

All consumer complaints filed with the Colorado Division of Banking must be submitted in writing.

[Complaint Form \(Word\)](#)

[Complaint Form \(PDF\)](#)

Send the complaint and supporting documentation by regular mail, facsimile, or electronic mail (e-mail) to the Colorado Division of Banking. **NOTE:** If filing electronically, scan and/or save the completed complaint form with related attachments to a PDF file, a Word doc, or Zip file, and attach to your E-mail.

Colorado Division of Banking

1560 Broadway, Suite 975, Denver, CO 80202

Phone: 303-894-7575

Fax: 303-894-7570

E-mail: DORA_BankingWebsite@state.co.us

Customer Notice (MO7):

<https://drive.google.com/file/d/1JvjFKSxYmKZEBTzba9zppEKkV5Bc3BOU/view>

District of Columbia

If you have a complaint, please contact West Realm Shires Services Inc. DBA FTX US at (510) 319-7213 and/or 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

[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. 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. 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

Kansas

If you have a complaint, please contact West Realm Shires Services Inc. DBA FTX US at (510) 319-7213 and/or 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 Consumer Affairs Department.

1. Complete consumer assistance PDF form
<https://www.osbckansas.org/consumers/complaintform.pdf>
2. Attach copies of documents related to your concerns, such as contracts, monthly statements, receipts and correspondence with the company. DO NOT SEND ORIGINAL DOCUMENTS AS THEY WILL NOT BE RETURNED.
3. Mail or fax the completed consumer assistance form and attachments to:

Kansas Office of the State Bank Commissioner
Attn: Consumer Affairs Department
700 SW Jackson St, Suite 300
Topeka, KS 66603
Telephone: (785) 296-2266
Fax: (785) 296-6037
Email: complaints@osbckansas.org
File a Complaint/Consumer Assistance
<https://www.osbckansas.org/consumers/complaints.html>

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 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>.

Utah

Virtual Currency Disclosure

West Realm Shires Services Inc. DBA FTX US is licensed by the Utah Department of Financial Institutions as a money transmitter. At this time, the Utah Department of Financial Institutions does not license or regulate services related to virtual currency.

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. 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

Wisconsin

Virtual Currency Disclosure

The Wisconsin Seller of Checks law does not regulate virtual currency. Therefore, such transmissions are not covered under the Wisconsin license.

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.