

Amy Greenwood-Field



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education

University of Nebraska College of Law (J.D., 2000)

University of Nebraska (B.A., 1997)

admissions

District of Columbia

Nebraska

affiliations

Professional:

- Money Transmitter Regulators Association (MTRA) – Industry Advisory Council, Chair
- Compliance Council, IMTC Conferences
- NMLS Industry Development Working Group
- NMLS Key Individual Working Group (KIWI)
- Foreign Licensing Working Group
- American Association of Residential Mortgage Regulators (AARMR) – Industry Advisory Council, former member
- NMLS Policy Committee, former member

Having worked as a state regulator for 15 years and with the NMLS since its inception shaped my practice, and my clients directly benefit from that experience. I know how to get the answers that you can't get from the NMLS call center. I know the regulators and the regulators take my calls. If my client's issue touches the state regulatory system, I help them understand what it will take to be in compliance. The field of cryptocurrency and digital assets is rapidly evolving, and I guide FinTechs through confusing, convoluted state and federal requirements.

Amy Greenwood-Field is a nationally recognized leader on Nationwide Multistate Licensing System & Registry (NMLS) compliance. She assists with analyzing proposed business models for depository, non-depository, and FinTech clients on regulatory and licensing requirements. Her experience involves preparing multistate regulatory surveys for financial service providers and facilitating interaction with regulatory agencies on various compliance matters. Amy's clients range from

traditional mortgage brokers, bankers, and servicers to bank partners, installment lenders, consumer and commercial lenders, and money services companies.

As a young attorney, Amy's practice was developed at the Nebraska Department of Banking, one of the first states to move licensing to the NMLS. As a former regulatory NMLS system administrator and Policy Committee member, she has been deeply involved with the development, testing, and use of the system and its related reporting requirements. She has a comprehensive understanding of the system and its nuances, spanning everything from application submissions and review to change notices, reporting, renewals, and disclosures. In recent years, Amy has developed a deep knowledge of the licensure restrictions and permissions related to the transition to "work from home" protocols spurred by the COVID-19 pandemic.

When it comes to cryptocurrency, virtual currency, and digital assets, the regulatory framework is slowly catching up to disruptive technology. Amy maintains up-to-date knowledge of the various state and federal regimes to counsel a wide variety of financial clients on licensure and operational requirements for domestic and international transactions. From crypto-to-crypto to fiat-to-crypto transmissions, Amy helps clients navigate the regulatory terrain.

A trusted advocate for her clients, Amy is a member of the NMLS's Industry Development Working Group, a panel of industry members that directly advises upon the development and regulatory concerns surrounding system use, and frequently submits issues for discussion and resolution to the NMLS Ombudsman. She also serves as the inaugural chair of the Money Transmitter Regulators Association (MTRA) Industry Advisory Council.

representative experience

- Assisting large global payments company in its review of acquisition target's proposed business lines, including review of necessary money transmitter licenses and registrations related to virtual currency transmission (including crypto-to-crypto, crypto-to-fiat, and fiat-to-

crypto), issuance of new virtual currency products and hosted and unhosted wallet products.

- Counseling with respect to analysis of business models within the context of regulatory, compliance matters and licensing requirements associated with the build-out and daily operations of their financial services operations, including mortgage lenders, mortgage servicers, consumer lenders and money services businesses.
- Representing and providing strategic counsel with respect to licensing concerns related to merger and acquisition transactions. Coordinating with regulatory agencies and NMLS to achieve time-sensitive approvals necessary to complete large-scale multistate transactions.
- Responsible for the oversight of large merger and acquisition transaction processes on the NMLS, including the nationwide transfer of licensed branches, licensed individual mortgage loan originators and addition of other trade names at the corporate and branch levels. Achieve significant branch and individual approval on day one of the transaction, allowing for business continuity. Enlisted and maintained regulatory buy-in, even when agencies were asked to deviate from normal licensing practices in order to timely accomplish transaction goals.
- Providing technical review and support with respect to the Mortgage Call Report, Money Services Business Call Report and state-specific report filing requirements.
- Coordinating with key control persons to assist with the reporting of material changes related to licensing.
- Responding to inquiries regarding 50-state, District of Columbia, Guam, Puerto Rico, American Samoa, Northern Mariana Islands, and U.S. Virgin Islands consumer finance laws and applicable federal regulations.
- Assisting with registration and compliance issues related to government services and federal agencies such as the Department of Housing and Urban Development, the Federal Housing Authority, Ginnie Mae, Fannie Mae, Freddie Mac, Department of Veterans' Affairs, Department of Agriculture, Consumer Financial Protection Bureau (CFPB), and the Financial Crimes Enforcement Network (FinCEN).

- Dialogue in both adversarial and non-adversarial proceedings before state and federal regulatory agencies.
- Preparing multistate regulatory surveys concerning regulatory compliance issues for both depository and nondepository financial service providers and consumer and commercial service providers.
- Assisting with the development of policies, procedures and strategic initiatives to proactively address regulator compliance deficiencies.
- Performing examination preparedness review of policies and procedures scrutinized in connection with routine and special examinations by state regulators, the MMC and the CFPB.
- Reviewing examination requests, documents and loan files gathered for response, and acting as an intermediary during the examination process between the regulatory agency and the client.
- Negotiating findings with examiners prior to the examination report being finalized, as well as identifying mutually agreeable remediation actions in lieu of issuance of formal action.
- Assisting with international licensing issues in the United States in a changing regulatory environment.

presentations

"How to Reach a Win-Win: NMLS Best Practices," 2024 NMLS Conference, San Antonio, Texas, February 15, 2024

"There's an App for that: Managing Regulatory Expectations," 2023 Consumer Finance Legal Conference, October 13, 2023

"Current Licensing Challenges: Change of Control, Financial Condition, and New Reporting Requirements," 2023 Consumer Finance Legal Conference, October 12, 2023

"Recent and Coming Changes to Licensing That May Create Challenges: Are You Ready," 2023 Consumer Finance Legal Conference, October 11, 2023

"Tips for Successfully Engaging Your State Regulator," Mortgage Bankers Association's (MBA) State and Local Workshop, Washington, DC, April 18, 2023

"Deep Dive into DeFi: Q&A" McGlinchey Webinar, November 30, 2022

"MTCC Advanced Compliance Workshop," CrossTech World 2022 Conference, November 15, 2022

"Regulating Magical Internet Money – Fitting New Technology Into Existing Regulatory Boundaries," 2022 Consumer Finance Legal Conference, October 20, 2022

"When Is Virtual Currency Treated as Currency Under State Law?" McGlinchey Webinar, September 30, 2022

"Regulatory Challenges as Virtual Currency Becomes 'Real' Money," MTRA Annual Conference, September 21, 2022

"Regulatory Challenges in Crypto," Been Around the Block-Chain: Exploring the Legal Impact of Digital Currency, NFTs, and the Metaverse, Lawline, June 28, 2022

"Current State of Regulatory Network Supervision," CrossTech Compliance Conference, June 22, 2022

Panelist, "MSB Call Report Additions for Virtual Currency Companies," 2022 NMLS Annual Conference and Training (Virtual), February 23, 2022

Facilitator, Industry Only Forum, 2021 MTRA Annual Conference (Virtual), August 31, 2021

Moderator, "Regulating Magical Internet Money," 2021 MTRA Annual Conference (Virtual), September 2, 2021

Panelist, "The Changing Face of US State Fintech Regulation," 2021 IMTC Regliance (Virtual), June 10, 2021

Moderator, "Managing Post-Licensure Regulatory Issues Panel," 2021 IMTC Regliance (Virtual), June 9, 2021

Moderator, State Compliance Panel, 2020 IMTC World Conference (Virtual), November 17, 2020

Moderator, Regulatory Family Feud, 2020 MTRA Annual Conference (Virtual), September 17, 2020

Facilitator, Industry Only Forum, 2020 MTRA Annual Conference (Virtual), September 15, 2020

Moderator, "Maintaining Your License During Business Changes," NMLS 2020 Annual Conference & Training, San Francisco, CA, February 19, 2020

Panelist, "The US Money Service Business Industry: The MSBA & The IAC," IMTC World Conference, Miami, Florida, November 13, 2019

Moderator, "Regulatory Expectations," IMTC World Conference, Miami, Florida, November 13, 2019

Panelist, "MSB Proposed Model Law," IMTC World Conference, Miami, Florida, November 13, 2019

Facilitator, Industry Only Forum for Transmitters and Suppliers to the MT Industry, 2019 MTRA Annual Conference, September 10, 2019

Panelist, "Don't Panic! Successfully Maintaining Your License During Business Changes," 2019 MTRA Annual Conference, September 11, 2019

Panelist, "Payments Processing Roundtable: The Future of Payment Processing and Money Service Businesses," March 14, 2018; Maurice A. Deane School of Law, Hofstra Law School, Hempstead, New York
Speaker, "MSB Call Report Questions and Answers," Money Services Business Association Telephonic Board Meeting, May 26, 2017

published articles

"What Louisiana companies need to know about cryptocurrency and digital transactions," *Greater Baton Rouge Business Report*, November 9, 2022

"FinCEN Issues Final Rule Establishing Beneficial Ownership Information Requirements," ABA Business Law Today, October Month-In-Brief: Business Regulation & Regulated Industries, November 1, 2022