## Majestic Advising

# Compliance Officer Resource Guide

*Federal & Oklahoma State regulatory resources — USD⇄USDC money transmission · DRAFT — FOR REVIEW*

| Version | Date | Notes |
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| 1.0 | August 23, 2026 | First release — compiled for Lindsey Rithamel (BSA/AML Compliance Officer) as a direct-access companion to the Compliance Roadmap and Majestic Ops Compliance page. |

This is a curated, direct-access reference to the primary-source federal and Oklahoma state regulatory materials relevant to standing up and running BSA/AML compliance for a USD⇄USDC on/off-ramp money services business. It's organized by topic, in the order a compliance officer is likely to need it: registration and core BSA obligations first, then the virtual-currency- and stablecoin-specific layer on top of that, then sanctions, then Oklahoma's state licensing regime, then examination and industry-standards resources.

Every entry links directly to the agency's own page or document — no summaries, no third-party explainer sites — so nothing gets filtered through an intermediary that might be out of date. Descriptions underneath each link say what it is and why it's on this list.

*This is an internal planning reference, not legal advice. Regulatory pages and requirements change — before relying on any figure here for an actual filing or compliance decision, confirm it against the live agency page (linked) or with counsel.*

### Quick reference — the numbers that show up everywhere

**MSB registration (FinCEN Form 107):** file within 180 days of starting money-transmission activity; renew every 2 years (Dec 31 of odd-numbered years); no fee.

**SAR (Suspicious Activity Report):** $2,000 threshold for MSBs; file within 30 days of detection.

**CTR (Currency Transaction Report):** $10,000 threshold, single day, currency transactions.

**Travel Rule:** $3,000 threshold on transmittal orders; applies to convertible virtual currency per FinCEN's 2019 guidance.

**Recordkeeping:** 5 years, for BSA records generally.

**Oklahoma MTL fee schedule (new, effective 11/1/2026):** ~$4,000 application + ~$3,000 license + ~$120 NMLS; $500,000 surety bond for digital-asset activity; net worth = greater of $100,000 or a tiered % of tangible assets.

**Oklahoma statutory decision clock:** 120 days post-completeness on a license application.

## 1. Federal — FinCEN Registration & Core BSA Requirements

*The baseline every money services business has to clear before anything virtual-currency-specific applies.*

FinCEN — Home

Top-level entry point for the Financial Crimes Enforcement Network; use this if a link below ever moves.

Money Services Business (MSB) Registration

The registration overview page — start here for Form 107 filing, who must register, and renewal timing.

Registration Form (Form 107, e-file)

The actual electronic Form 107 filing portal. Free to file; must be filed within 180 days of starting money-transmission activity and renewed every 2 years.

BSA Requirements for MSBs

Consolidated summary of every ongoing BSA obligation an MSB carries: AML program, SAR, CTR, recordkeeping, Travel Rule.

Fact Sheet on MSB Registration Rule

Short, plain-language fact sheet on who has to register and when — good for onboarding staff or a quick refresher.

A Quick Reference Guide for Money Services Businesses (PDF)
FinCEN's own condensed cheat sheet covering registration, AML program pillars, SAR/CTR, and recordkeeping in one document.

A Money Services Business Guide (Prevention Guide, PDF)
Longer-form guidance on building an AML compliance program specifically for MSBs, including red-flag examples.

MSB Examination Manual (PDF)
The manual FinCEN examiners themselves use — read this to know exactly what an examiner will be checking for.

Important Information for MSBs (resource hub)
FinCEN's running index of MSB-specific guidance, rulings, and notices — check back periodically for new items.

MSB Registrant Search
Public database to verify whether a counterparty or vendor is actually FinCEN-registered — useful during vendor/counterparty due diligence.

Legal Reference for BSA Forms and Filing Requirements
Index tying every BSA form to its underlying statute/regulation citation — useful when you need the legal basis, not just the form.

BSA E-Filing System
The actual portal used to file SARs, CTRs, and the MSB registration itself. Enroll here before you need to file anything urgently.

Guidance on MSBs Obtaining and Maintaining Banking Services
FinCEN's own guidance addressed to banks about banking MSBs — worth having on hand if a banking relationship ever gets questioned internally by a partner bank's compliance team.

## 2. Federal — Virtual Currency & Stablecoin-Specific Guidance

*The layer specific to what Majestic Advising actually does: exchanging USD for USDC and back. This is the newest and fastest-moving category — check it most often.*

FinCEN Guidance FIN-2019-G001 — Application of FinCEN's Regulations to Certain Business Models Involving Convertible Virtual Currencies
The core guidance establishing that a CVC exchanger (like Majestic) is a money transmitter under the BSA. This is the single most important document in this whole list.

FIN-2019-G001 — direct PDF
Same guidance as above, direct PDF for printing or offline reference.

FinCEN Notice FIN-2025-NTC1 — Convertible Virtual Currency Kiosks
FinCEN's most recent (Aug 2025) notice specifically on CVC kiosks — directly relevant background given Oklahoma's SB 1083 kiosk-specific licensing requirement, even though Majestic's model is account-based, not kiosk-based.

GENIUS Act — Public Law 119-27 (official enacted text)
The actual signed federal stablecoin law (2025). Majestic is a USDC reseller/exchanger, not an issuer, so most obligations here fall on Circle, not Majestic — but this is the primary source, not a summary.

OCC Bulletin 2026-3 — GENIUS Act Regulations: Notice of Proposed Rulemaking
The OCC's proposed rules implementing the GENIUS Act for OCC-supervised stablecoin issuers — track this for how the federal framework around Majestic's USDC supply is taking shape.

OCC Bulletin 2026-24 — Reporting Forms for Permitted Payment Stablecoin Issuers
The specific reporting forms OCC-supervised issuers will file — relevant context, not a direct Majestic obligation.

OCC Bulletin 2026-28 — GENIUS Act AML/CFT and Sanctions Compliance: Notice of Proposed Rulemaking
The AML/sanctions-specific half of the OCC's GENIUS Act rulemaking — the part most likely to eventually touch downstream resellers like Majestic.

FDIC — NPRM: BSA and Sanctions Compliance Standards for FDIC-Supervised Stablecoin Issuers
FDIC's parallel rulemaking to the OCC's, for issuers it supervises.

FDIC — NPRM: Customer Identification Program for Stablecoin Issuers
FDIC's proposed CIP standards for its supervised issuers.

OCC — Joint Statement on Crypto-Asset Risks to Banking Organizations (Jan. 2023)
The Fed/FDIC/OCC joint statement on crypto risk to banks — useful context for why banking relationships for crypto-adjacent MSBs can be harder to get and keep.

## 3. Federal — OFAC & Sanctions Compliance

*Screening obligations are separate from BSA/AML program obligations and come from Treasury's Office of Foreign Assets Control, not FinCEN.*

OFAC — Home
Office of Foreign Assets Control home page.

Sanctions List Search (SDN & consolidated lists)
The actual screening tool — search any counterparty name/wallet-linked entity against OFAC's Specially Designated Nationals and other sanctions lists before onboarding or clearing a transaction.

Sanctions List Search Tool (overview / API access)
Overview of the search tool above, plus how to pull the lists programmatically if Majestic's screening vendor needs a data feed.

Sanctions Programs and Country Information
Index of every active sanctions program (country- and activity-based) — use this to understand the full scope of what's being screened for, not just names.

OFAC FAQs
Searchable FAQ database — OFAC's own answers to specific screening/compliance scenarios.

OFAC FAQ #401 — the "50% Rule"
Explains OFAC's rule that an entity 50%+ owned (in aggregate) by one or more blocked persons is itself blocked, even if not separately listed — relevant to beneficial-ownership screening on entity/trust clients.

## 4. Federal — Information Sharing, Customer Due Diligence & Advisories

FinCEN Section 314(a)
The program letting law enforcement request financial institutions search for suspected terrorist/money-laundering-related accounts — register so Majestic can respond to 314(a) requests if one ever arrives.

FinCEN Section 314(b) Fact Sheet (PDF)
Voluntary safe-harbor program letting financial institutions share information with each other about suspected money laundering/terrorist financing — optional but often used by MSBs to compare notes with banking partners.

CDD Rule FAQs
FinCEN's own FAQ on the Customer Due Diligence rule — beneficial ownership identification/verification for entity clients, directly relevant to the EDD program for HNWI and entity clients.

Alerts / Advisories / Notices / Bulletins / Fact Sheets (index)
FinCEN's full running index of advisories — the fastest way to see if something new and relevant (e.g., a new typology or red-flag advisory) has been issued.

## 5. Federal — Statute & Regulation Text, Examination Manual

31 CFR Chapter X — FinCEN Regulations (eCFR)
The actual current regulatory text FinCEN operates under, kept continuously updated by the government (this is the live, official version — not a static PDF that can go stale).

31 CFR Part 1020 — Rules for Banks (incl. §1020.320 SAR reporting)
The specific part covering SAR filing obligations, referenced heavily across MSB guidance even though it's titled for banks.

FFIEC BSA/AML Examination Manual
The interagency examination manual banking regulators use — even though Majestic is examined by FinCEN/OSBD rather than the FFIEC member agencies directly, this manual is the closest thing to an industry-standard playbook for what a well-run BSA/AML program looks like.

## 6. Oklahoma State — Regulator, Licensing & Statutes

*Oklahoma's regulator is the Oklahoma State Banking Department (OSBD) — not the Department of Consumer Credit.*

Oklahoma State Banking Department — About
OSBD's own about page — starting point for the regulator itself.

OSBD — Contact
Direct contact page — use this to get OSBD's position in writing on anything ambiguous (e.g., whether the account-based USD/USDC model requires MTL licensure) rather than relying on a third-party summary.

OSBD — Rules and Statutes
OSBD's own index of the rules and statutes it operates under — the authoritative starting point over any third-party licensing-service summary.

OSBD — Money Transmitter Licensing
The specific page for money transmitter licensing requirements, directly from the regulator.

OSBD — Money Transmitter Forms
The actual application and related forms for an Oklahoma money transmitter license.

OSBD — Institution Lists
Public list of OSBD-licensed/regulated institutions — useful to verify a counterparty's Oklahoma license status.

Oklahoma Statutes, Title 6 — Banks and Trust Companies (OSCN)
Oklahoma's official statute search system. The Money Transmitter Act sits in Title 6, Chapter 8 (§6-1512 definitions onward); search from this hub for the current codified text.

Title 6, §6-1513 — Registration, License, Fees (Justia mirror, readable copy)
A more readable third-party mirror of the specific section governing license application, fees, and violations — cross-check anything relied on here against the official OSCN text above.

Oklahoma Administrative Code, Title 85, Chapter 15 — Money Service Businesses (Cornell LII)
The administrative rules implementing the statute above — this is where the operational detail lives (bonding, net worth, permissible investments, kiosk requirements under SB 1083, etc.).

NMLS — Oklahoma State Licensing Requirements (Money Transmitter)
NMLS's own state-specific checklist for an Oklahoma money transmitter license filed through the multistate system.

NMLS — Multistate MSB Licensing Program, Phase One Checklist (PDF)
If Majestic ever expands beyond Oklahoma, this is the standardized multistate application checklist most states (including Oklahoma) participate in through NMLS.

## 7. Industry Standards, Certification & Training

CSBS — Conference of State Bank Supervisors
The umbrella organization for state banking regulators, including OSBD — publishes model laws and coordinates the NMLS system used for Oklahoma's own licensing.

CSBS — Money Services Businesses (policy hub)
CSBS's own running index of MSB-related policy work, including its model law effort — useful for seeing where state regulation of MSBs (including stablecoin activity) is heading nationally.

CSBS — Nationwide Multistate Licensing System (NMLS)
CSBS's overview of the NMLS system Oklahoma's licensing runs through.

FFIEC BSA/AML Portal
Home page for the interagency exam manual and procedures referenced in Section 5 above — bookmark the portal itself, not just the manual page, since exam procedures live here too.

ACAMS — CAMS Certification
The industry-standard professional certification for AML/BSA compliance officers (Certified Anti-Money Laundering Specialist) — worth considering for Lindsey's ongoing professional development given her role's regulatory exposure.

## Open items for a future revision

- This guide compiles publicly available agency resources; it does not replace direct written confirmation from OSBD on Majestic's specific licensing question (account-based USD/USDC model vs. SB 1083's kiosk-specific trigger) — that confirmation is tracked separately in the OK Banking Department meeting-prep materials.
- The OCC/FDIC GENIUS Act rulemaking bulletins in Section 2 are proposed rules as of this writing — check back for final rules and effective dates before treating them as settled.
- Link rot check: agency sites reorganize periodically. If a link in this document 404s, search the agency's own site directly rather than falling back to a third-party summary site, and update this document's next revision.