



NAVIGATING BITCOIN ATM COMPLIANCE

Let's get to know the four steps to begin operations with compliance !



Have you been thinking about the possibility of starting a Bitcoin ATM operation? Are you hesitant because you're unsure where to start or what to do with Bitcoin ATM compliance? Rest assured that you are not alone. Many new operators are learning that there is more to just picking out a Bitcoin ATM.



FEDERAL REGISTRATION WITH FINCEN

You begin the process of registering your business with Financial Crimes Enforcement Network (FinCEN), a department of the U.S. Treasury. FinCEN requires that each Bitcoin ATM business register as a Money Services Business (MSB) within 180 days of the business being established. Registration must be renewed every two years.

ESTABLISH A WRITTEN AML & KYC PROGRAM

The second step is to establish a written Anti-Money Laundering and Know Your Customer (AML & KYC) program. Putting a comprehensive AML & KYC program in place is not a simple and straight forward task. This written program details the business, agents, compliance officer, operations, and the controls used to thwart money laundering and the funding of terrorism.



CHECK WITH STATE GOVERNMENT FOR ADDITIONAL LICENSING

Third is to check with your local state government to ensure they do not require a Money Transmitter License, also known as an MTL. This requirement differs from state to state. It is critical to either have an MTL with the state or receive a response from a "No action" letter for your files in states that do not have MTL's.

BEGIN OPERATIONS AND REQUIRED REPORTING

You are now ready to begin the operation of your Bitcoin ATM's. The monitoring and screening of every transaction will begin and your compliance officer will assist with the identification of transactions that need to be reported via Currency Transaction Reports (CTR's) and Suspicious Activity Reports (SAR's). Additionally, there is the Office of Foreign Assets Control (OFAC), Specially Designated Nationals & Blocked Persons list (SDN), and Politically Exposed Person (PEP) screening and reporting.



ABOUT BTM COMPLIANCE, LLC

BTM Compliance is veteran owned and operated full-service compliance consulting company focused on assisting operators with federal compliance for virtual currency kiosks / Bitcoin ATMs (BTMs). They were established in 2017 with the sole purpose of providing compliance services to operators of BTMs. BTM Compliance is comprised of a team of compliance experts with a thorough understanding of the U.S. Bank Secrecy Act (BSA), USA PATRIOT ACT, Anti-Money Laundering, terrorist financing, and the Office of Foreign Asset Control (OFAC).

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