

Troy K. Jenkins

ASSOCIATE



Fintech and
Financial Services
Washington, D.C.

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FOCUS AREAS

Anti-Money Laundering
Blockchain and
Cryptocurrency
Fintech and Financial
Services
Internet
National Security
Payments
Regulatory
Technology Transactions
U.S. Expansion

HIGHLIGHTS

-  **Experience with Risk Mitigation**
Troy helps financial technology companies, payment processors, money transmitters, and other financial services companies navigate both state and federal regulatory landscapes.
-  **Industry Expertise**
Troy has extensive experience with the Electronic Fund Transfers Act and has advised and audited an eCommerce payments acceptance portal.

EXPERIENCE

Troy Jenkins is an associate in the Washington, D.C., office of Wilson Sonsini Goodrich & Rosati. His practice focuses on advising financial institutions, financial services companies, and technology companies providing electronic payment services on the legal issues affecting their business. Troy's particular areas of expertise include federal money services business laws; state money transmission laws; the Electronic Fund Transfers Act (EFTA) and Regulation E; federal anti-money laundering laws; and the Electronic Signatures in Global and National Commerce Act (E-Sign Act). He also counsels clients on compliance with sanctions regimes.

Troy's representative subject matter areas have included money services' business registration and money transmitter licensure; structuring novel financial products; e-commerce and electronic funds transfers; and anti-money laundering and economic sanctions compliance. Troy regularly advises clients on emerging federal and state legislative and regulatory developments; regulatory compliance; licensing requirements; and negotiating bank and payment processing partnership agreements. He also counsels clients seeking assistance with regulatory due diligence and money laundering investigations.

Prior to joining the firm, Troy worked as an associate at a national law firm.

He frequently provides analysis and commentary on legal and business developments in the financial services industry.

CREDENTIALS

Education

- J.D., University of Richmond School of Law, 2016
Managing Editor, University of Richmond Journal of Global Law and Business; *Legal Honors Extern*, U.S. Securities and Exchange Commission; *Corporate Scholar (2015)*, Association of Corporate Counsel

- B.A., Government and History, University of Virginia, 2009

Associations and Memberships

- Mentor, Leadership Council on Legal Diversity

Honors

- Recognized in National Black Lawyers Top 40 Under 40 in 2020

Admissions

- Bar of the District of Columbia
- Virginia State Bar

INSIGHTS

Select Publications

- Co-author, "Navigating the Current State of Financial Services for Marijuana Businesses and Preparing for Future Changes in Cannabis Banking," Wilson Sonsini Alert, October 18, 2023
- Co-author, "Building a Payment Rail: Key Legal Considerations for Technology Platforms and Online Marketplaces," *Business Law Today*, June 12, 2023
- Co-author, "Treasury Risk Assessment Emphasizes That Decentralized Crypto Companies Have AML and Sanctions Compliance Obligations," Wilson Sonsini Alert, April 25, 2023
- Co-author with J. Cheng, J. Hartwig, and S. Heifetz, "Coinbase Agrees to Pay \$100 Million and Improve Compliance Program and Regulators Continue Scrutiny of Crypto Asset Companies," Wilson Sonsini Alert, January 12, 2023
- Co-author with M. Casey, J. Hartwig, S. Heifetz, and A. Seymour, "Crypto Exchange Agrees to Pay More Than \$362,000 to Settle Alleged Sanctions Violations," Wilson Sonsini Advisory, December 14, 2022
- Co-author with J. Davey, J. Hartwig, and S. Heifetz, "Cryptocurrency Exchange Platform Agrees to Pay over \$53 Million for Anti-Money Laundering and Sanctions Violations," Wilson Sonsini Alert, October 18, 2022
- Co-author with M. Casey, J. Davey, and S. Heifetz, "Final Regulations on Beneficial Ownership Will Require 'Tens of Millions' of Legal Entities to File Reports," Wilson Sonsini Alert, October 4, 2022
- Co-author with J. Davey and S. Heifetz, "Money Services Businesses Penalized for Failure to Adopt Robust Anti-Money Laundering Practices," Wilson Sonsini Alert, August 18, 2022
- Co-author with S. Heifetz, "Headed to the Metaverse? Be 'The One' to Minimize Money Laundering Risk," Wilson Sonsini Advisory, July 14, 2022
- Co-author with A. Caiazza, J. Davey, J. Hartwig, S. Heifetz, and J. Kaplan, "No Foolish Transactions: A Few Guidelines for NFT Marketplace Participants to Mitigate Anti-Money Laundering Risks," Wilson Sonsini Advisory, May 23, 2022
- Co-author with M. Alioto, A. Caiazza, and S. Heifetz, "President Biden Signs Executive Order on Ensuring Responsible Development of Digital Assets," Wilson Sonsini Advisory, March 15, 2022
- Co-author with S. Heifetz and J. Kaplan, "Is Regulation of NFTs to Combat Financial Crime on the Horizon?" Wilson Sonsini Alert, February 23, 2022
- Co-author with M. Casey, J. Davey, J. Gruenspecht, and S. Heifetz, "New Rules Will Require Beneficial Ownership Reporting to Federal Regulators by U.S. and Foreign Corporations, LLCs, and Other Legal Entities," Wilson Sonsini Alert, January 4, 2022
- Co-author with J. Davey and S. Heifetz, "National Cryptocurrency Enforcement Team Turns Up the Crypto Heat," Wilson Sonsini Alert, October 18, 2021
- Co-author with J. Kaplan, "The Evolving Cryptocurrency Landscape," Wilson Sonsini Advisory, November 19, 2021
- Co-author with J. Kaplan, "Money Transmitter Model Law Poised to Change Regulatory Landscape," Wilson Sonsini Advisory, November 9, 2021
- Co-author with J. Kaplan, "Joint Guidance Released to Help Banks Conduct Due Diligence on Fintech Companies," Wilson Sonsini Advisory, November 9, 2021
- Co-author with J. Kaplan, "CFPB's Payday Rule Back in Jeopardy, Perhaps Paving the Way for More EWA Programs," Wilson Sonsini Advisory, November 9, 2021
- Co-author with M. Casey, J. Davey, J. Hartwig, and S. Heifetz, "New OFAC Guidance Raises the Stakes for Crypto Industry," Wilson Sonsini Alert, October 20, 2021
- Co-author with J. Davey and S. Heifetz, "National Cryptocurrency Enforcement Team Turns Up the Crypto Heat," Wilson Sonsini Alert, October 18, 2021

Select Speaking Engagements

- Speaker, “[Complying with Money Transmission Laws: FBO Accounts, Other Exemptions,](#)”
Strafford CLE Webinar, March 29, 2023