

FinCEN MSB Registration - Public Verification Summary

Public verification (instant)

Search the FinCEN MSB Registrant Search portal: <https://www.fincen.gov/msb-state-selector>

Search criteria:

- **Legal name:** UNION BLOCK LLC
- **State:** Florida (operational) - Delaware (registered)
- **City:** Miami

The exact **MSB Registration Number** is provided on request and confirms instantly against the registry above. The active registration is the November 2022 principal registration (renewed January 2026).

Registration details

- **Entity name:** UNION BLOCK LLC
 - **EIN:** provided on request
 - **State of formation:** Delaware
 - **Principal place of business:** 800 Brickell Avenue, Suite 408, Miami FL 33131
 - **Federal registration:** FinCEN MSB - Principal Operator
 - **Registration number:** provided on request
 - **Registration date:** November 2022
 - **Most recent renewal:** January 2026
 - **MSB activity category:** Money Transmitter
 - **Designated Compliance Officer:** On file with FinCEN
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What FinCEN MSB principal registration means

A FinCEN Money Services Business (MSB) principal registration is a **federal anti-money-laundering credential**. Union Block registered as a **Money Transmitter** and operated as a **non-custodial, principal, spot-only OTC desk** - using its own funds to buy digital assets from liquidity providers and deliver them to a counterparty's designated wallet. FinCEN treats this transmission of value denominated in convertible virtual currency as money transmission under FIN-2013-G001 and FIN-2019-G001.

Registration carries affirmative BSA/AML obligations. Union Block LLC maintained a risk-based compliance program during the registration period, including:

- **Written AML/CTF program:** Policy v.4 (May 2023), developed under a designated Chief Compliance Officer and independently reviewed by external counsel
 - **Compliance ownership:** a designated Chief Compliance Officer - hired by the principal - with analyst support
 - **External counsel validation:** Nelson Mullins (AML/CTF policy review, Aug 2023) and Perkins Coie (OTC money-transmission and licensing assessment, Sept 2023)
 - **Customer intake:** CIP / KYC / KYB and beneficial-owner review at onboarding
 - **Transaction review:** risk-based transaction monitoring (KYT) and escalation workflow
 - **Recordkeeping:** operating books and supporting records preserved
 - **Licensing position:** counsel assessed FinCEN MSB as advisable (already obtained) and state money-transmitter licensure as not likely required in Delaware, Florida, and Wyoming
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Why this matters for institutional employers

A FinCEN MSB principal registration in good standing is the **single most important regulatory credential** for institutional digital-asset infrastructure roles. It demonstrates:

1. **Direct, principal-level experience with a regulated MSB operating framework**
 2. **A public federal registration that can be independently verified**
 3. **Personal responsibility for registration filings and renewal discipline**
 4. **Real customer-onboarding experience across a meaningful institutional counterparty base**
 5. **Practical experience coordinating fiat, stablecoin, and blockchain-settlement controls at scale**
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Additional regulatory engagement

Beyond the core MSB registration:

- **Perkins Coie LLP - September 2023:** Preliminary registration and licensing assessment for OTC activities (Delaware, Florida, Wyoming). Conclusion: FinCEN MSB advisable and already obtained; state money-transmitter licensure not likely required. Memo available on request.
 - **Nelson Mullins - August 2023:** Independent review of Union Block's AML/CTF policy (Policy v.4). Found the written policy robust and addressing key BSA/OFAC requirements, with recommended enhancements. Memo available on request.
 - **Blockchain-analytics tooling** used as part of transaction-risk review.
 - **Banking and regulated-counterparty relationships** with independent onboarding and compliance review processes.
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How to independently confirm

1. **Visit** <https://www.fincen.gov/msb-state-selector>
2. **Select State:** Florida (or Delaware)
3. **Search by name** "Union Block" (registration number provided on request)
4. **Result:** Public confirmation of registration, expiration date, activity types, and principal place of business

Employers' compliance teams can also email frc@fincen.treas.gov to request the standard MSB confirmation letter.

This document is verifiable in under 60 seconds at [fincen.gov](https://www.fincen.gov). No claim made above requires Stefano's say-so.