

Amy Greenwood - Field

Counsel



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Overview

Amy Greenwood-Field is a counsel in the Capital Markets practice group at Dentons, the world's largest law firm with offices in more than 200 locations worldwide. Amy represents financial service providers in regulatory, licensing, examination, enforcement and compliance matters related to residential and commercial mortgage lending, consumer finance lending, debt collection and money services businesses. A former state regulator for 15 years, Amy is a nationally recognized leader on Nationwide Multistate Licensing System & Registry (NMLS) compliance and is able to assist clients with compliance issues and interaction with regulatory agencies, on both the state and federal levels, with respect to licensing, audits, examinations and enforcement actions. Amy's clients rely on her to help them research regulatory requirements and maintain compliance with complex consumer finance regulatory demands.

Amy regularly assists with analysis of proposed business models for depository, non-depository and FinTech clients within the context of regulatory and licensing requirements. She is experienced with preparing multistate regulatory surveys concerning regulatory compliance issues for financial service providers and regularly facilitates interaction with regulatory agencies on a variety of compliance matters. She has extensive experience with the NMLS licensing system, and has been deeply involved with the development, testing and use of the system and related reporting requirements since its initial launch. Amy is a former regulatory NMLS system administrator with experience in all aspects of the system, including application submissions, checklist review, transitioning existing licenses into the system, amendments, Advance Change Notices, system reporting to ensure compliance with regulator requests, disclosure issues, proper document upload, required reporting (including the Mortgage Call Report and Money Services Business Call Report), Electronic Surety Bond use and coordination of large multistate transactions, including change of control events, mergers and acquisitions, and transfer of mortgage loan originators. Amy is an active participant on several NMLS development working groups, is a member of the AARMR Industry Advisory Council and also serves as the inaugural chair of the MTRA Industry Advisory Council.

Amy is an active participant on several NMLS development working groups and routinely submits issues affecting licensees to the NMLS Ombudsman for discussion and resolution. She formerly served on the NMLS Policy Committee, where she was the appointed representative for several states, including Colorado, Nebraska and Texas. She regularly speaks about a variety of legal issues pertaining to the system at the annual NMLS User Conference and is a member of the Industry Development Working Group, a panel of industry members that directly advises upon the development and regulatory concerns surrounding system use.

Amy is also a prolific speaker and author on both financial services and money services business topics, providing

practical information to both lawyers and nonlawyers. She formerly served as the Consumer Finance Review Examiner for the State of Nebraska Department of Banking and Finance. In that capacity, she was responsible for the administration and oversight of licensing, examinations and complaints related to consumer finance entities regulated by the Department, including delayed deposit services businesses (payday lenders), installment loan companies, installment sales companies (sales finance), mortgage banking companies (brokers, bankers and servicers) and mortgage loan originators. Amy has extensive experience with the Secure and Fair Enforcement for Mortgage Licensing (SAFE) Act for mortgage lenders, brokers and servicers, as well as other mortgage industry participants.

In a prior position, Amy was responsible for spearheading the effort to develop streamlined examination tools for payday lenders. She also has experience with NACHA and ACH rules as applied to payday lending and is familiar with small lender, collection agency and commercial licensing requirements. In addition, she is familiar with the Multistate Mortgage Committee (MMC) and US Consumer Financial Protection Bureau (CFPB) examination processes, and she has participated in the oversight and distribution of multistate settlement funds received by Nebraska.

Experience

- **Large global payments company:** Assisting 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.
- **Various clients:** 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.
- **Various clients:** 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.
- **Various clients:** Providing technical review and support with respect to the Mortgage Call Report, Money Services Business Call Report and state-specific report filing requirements.
- **Various clients:** Coordinating with key control persons to assist with the reporting of material changes related to licensing.
- **Various clients:** Responding to inquiries regarding 50-state, District of Columbia, Guam, Puerto Rico and US Virgin Islands consumer finance laws and applicable federal regulations.
- **Various clients:** Assisting with registration and compliance issues related to government services agencies such as the Department of Housing and Urban Development, the Federal Housing Authority, Ginnie Mae, Fannie Mae, Freddie Mac, the Department of Veterans' Affairs and the Department of Agriculture.
- **Various clients:** Dialogue in both adversarial and non-adversarial proceedings before state and federal regulatory agencies.
- **Various clients:** Preparing multistate regulatory surveys concerning regulatory compliance issues for both financial service providers and consumer service providers.

- **Various clients:** Assisting with the development of policies, procedures and strategic initiatives to proactively address regulator compliance deficiencies.
- **Various clients:** Performing examination preparedness review of policies and procedures scrutinized in connection with routine and special examinations by state regulators, the MMC and the CFPB.
- **Various clients:** 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.
- **Various clients:** Assisting with international licensing issues in the United States in a changing regulatory environment.

Insights

- "Crypto Asset Regulation in the United States: What? Where? When?" *Dentons client alert*, August 19, 2021
- "FinCEN Issues List of AML Priorities, Putting Covered Institutions on Notice of Upcoming Requirements, and Appoints First-Ever Chief Digital Currency Advisor," *Dentons client alert*, July 12, 2021
- "Are Your MCR Reports Timely, Accurate or Both?" *Mortgage Compliance Magazine*, July 7, 2014

Activities and Affiliations

Presentations

- 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
- Panelist, Regulators, De-Risking & Government Policy; Nov. 11, 2016; IMTC World Conference , Miami, Florida
- Panelist, Compliance Breakout, Regulatory Update; Nov. 9, 2016; IMTC World Conference, Miami, Florida
- Panelist, Compliance Breakout, Meet the Regulators; November 11, 2015, IMTC World Conference, Miami, Florida
- Panelist, 'Cause You Know We're All About the Lists: The Checklists!, Seventh Annual NMLS User Conference & Training, San Diego, California, February 2015
- Panelist, Advance Change Notifications, Fifth Annual NMLS User Conference & Training, San Antonio, Texas, February 2013
- Panelist, Pre-Notifications and NMLS, Fourth Annual NMLS User Conference & Training, Scottsdale, Arizona, February 2012
- Panelist, NMLS Reports – how to use them, how to improve them, Third Annual NMLS User Conference & Training, Orlando, Florida, February 2011
- Panelist, NMLS Application Processing on Steroids (Regulators Only), Second Annual NMLS User Conference & Training, San Diego, California, February 2010

Memberships

- Chair of the Industry Council to the Money Transmitter Regulators Association
- Compliance Council, IMTC Conferences
- NMLS Industry Development Working Group
- NMLS Key Individual Working Group (KIWI)
- NMLS 2.0 State Licensed Industry Engagement Working Group
- NMLS SES Industry Engagement Working Group
- Foreign Licensing Working Group
- AARMR Industry Advisory Council
- NMLS Policy Committee, former member

Areas of focus

Practices

- Capital Markets
- Regulated Industries
- Banking and Finance
- Public Policy and Regulation

Industry sectors

- Financial Institutions
- Government

Education

- University of Nebraska College of Law, 2000, Juris Doctor
- University of Nebraska, 1997, Bachelor of Arts

Admissions and qualifications

- District of Columbia
- Nebraska

Languages

- English