



0004761907

**STATE OF IDAHO***Office of the secretary of state, Lawrence Denney***FOREIGN REGISTRATION STATEMENT (LIMITED LIABILITY COMPANY)**

Idaho Secretary of State  
PO Box 83720  
Boise, ID 83720-0080  
(208) 334-2301  
Filing Fee: \$100.00

*For Office Use Only***-FILED-**

File #: 0004761907

Date Filed: 6/7/2022 1:11:44 PM

## Foreign Registration Statement (Limited Liability Company)

Select one: Standard, Expedited or Same Day Service (see descriptions below)      Expedited (+\$40; filing fee \$140)

## 1. The name this limited liability company will use in Idaho is:

Type of Limited Liability Company

Foreign Limited Liability Company

Entity name

Standard Custody &amp; Trust Company, LLC

Standard Custody &amp; Trust Company, LLC

## 2. Home Jurisdiction

The jurisdiction of formation is:

NEW YORK

## 3. The street address of its domestic principal office (if required by the laws of the jurisdiction of formation) is:

Street Address

SUELLEN GALISH, CHIEF COMPLIANCE OFFICER  
650 5TH AVENUE  
14TH FLOOR  
NEW YORK, NY 10022

## 4. The mailing address of its domestic principal office (if required by the laws of the jurisdiction of formation) is:

Mailing Address

SUELLEN GALISH, CHIEF COMPLIANCE OFFICER  
650 5TH AVENUE  
14TH FLOOR  
NEW YORK, NY 10022

## 5. The complete street address of the principal office is:

Principal Office Address

SUELLEN GALISH, CHIEF COMPLIANCE OFFICER  
650 5TH AVENUE  
14TH FLOOR  
NEW YORK, NY 10022

## 6. The mailing address of the principal office is:

Mailing Address

SUELLEN GALISH, CHIEF COMPLIANCE OFFICER  
650 5TH AVE  
FL 14  
NEW YORK, NY 10019-6108

## 7. Registered Agent Name and Address

Registered Agent

CT CORPORATION SYSTEM  
Commercial Registered Agent  
Physical Address  
921 S ORCHARD ST  
STE G  
BOISE, ID 83705  
Mailing Address  
921 S ORCHARD ST  
STE G  
BOISE, ID 83705

☒ I affirm that the registered agent appointed has consented to serve as registered agent for this entity.

## 8. Governors

Name	Title	Address
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John McDonald	Manager	650 5TH AVE FL 14 NEW YORK, NY 10019-6108
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Signature of individual authorized by the entity to sign:

<i>Suellen Galish</i>	<i>06/07/2022</i>
Sign Here	Date
Job Title: Chief Compliance Officer	

*New York State*  
*Department of Financial Services*

**I, MATTHEW SIEGEL**, Deputy Superintendent for Research and Innovation Division,  
New York State Department of Financial Services, **DO HEREBY CERTIFY:**

**THAT, STANDARD CUSTODY & TRUST COMPANY LLC**, is a limited liability trust company duly organized and existing under the laws of the State of New York and has its principal office and place of business at **150 East 52<sup>nd</sup> Street, New York, New York**. Such limited liability trust company is validly existing as a banking organization under the New York Banking Law. The authorization certificate of such limited liability trust company has not been revoked or suspended and such limited liability trust company is a subsisting **limited purpose trust company** under the supervision of this Department.

The powers of such limited liability trust company are subject to certain restrictions in its Articles of Organization.

**WITNESS**, my hand and official seal of the Department of Financial Services at the City of New York, this **28<sup>th</sup>** day of **February** in the Year **two thousand and twenty-two**.



**By: /s/ Matthew Siegel**  
**Matthew Siegel**  
**Deputy Superintendent**  
**Research and Innovation Division**  
**One State Street**  
**New York, New York 10004**



# IDAHO

DEPARTMENT OF FINANCE

BRAD LITTLE  
Governor

PATRICIA R. PERKINS  
Director

May 10, 2022

Julia Brown  
Senior Paralegal  
Perkins Coie LLP  
2901 North Central Avenue Suite 2000  
Phoenix, AZ 85012-2788

Transmitted via email to: [JuliaBrown@perkinscoie.com](mailto:JuliaBrown@perkinscoie.com)

*RE: Use of the Word "Trust" in Company Name in Idaho*

Dear Ms. Brown:

The Idaho Department of Finance (Department) received your email dated April 16, 2022, along with an attached Certificate of Organization issued by the New York State Department of Financial Services on February 28, 2022, to your client, Standard Custody & Trust Company, LLC. In your email, you indicate that your client is planning to file a Foreign Registration Statement with the Idaho Secretary of State and requests permission from the Department to use the business name "Standard Custody & Trust Company, LLC" (Standard) in this state. You also indicate that Standard is a New York state-chartered limited purpose trust company that is not intending to maintain a physical location within the state of Idaho, nor will it conduct any bank or trust fiduciary services in Idaho. We understand that Standard intends to offer money transmission and digital asset custodial services, as well as "any other lawful purpose" business in Idaho.

Idaho Code § 26-1202 generally prohibits persons from advertising or transacting business in this state under a name or title containing the words "trust company" or a word or words of similar import, unless the person holds a charter to engage in trust business, or unless the director has granted the person a waiver from this prohibition as set forth in this section. However, Idaho Code § 26-1202(2) states that the "prohibition shall not apply to a ... state-chartered bank or trust company located in another state that has obtained all approvals that may be required under the law as a prerequisite to doing business in this state." Since the statute does not apply to a state-chartered trust company, there is no need for the Director to grant a waiver to Standard to use the word "trust" in its name in Idaho. Under these circumstances, the Department offers "no objection" to Standard Custody and Trust Company, LLC, to use of the word "trust" in its name to register to do business in Idaho so long as it meets all Idaho legal prerequisites.

FINANCIAL INSTITUTIONS BUREAU

Bureau Chief – Salvador Cruz  
800 Park Blvd., Suite 200, Boise, Idaho 83712  
Mail To: P.O. Box 83720, Boise Idaho 83720-0031  
Phone: (208) 332-8000 Fax: (208) 332-8099  
<http://finance.idaho.gov>

Julia Brown  
May 10, 2022  
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Please be advised the custody of digital assets and fiat currency constitutes "trust business" as defined in the Idaho Trust Institutions Act (Act) and engaging in "trust business" in the State of Idaho requires approval by the Director. Please provide a response to the Department within 90 days of the date of this letter detailing the business activities Standard intends to conduct in Idaho.

Please contact Supervising Examiner Robert Moore at (208) 332-8042 with any questions regarding trust business and digital asset custody requirements. Please contact Securities Investigations Supervisor Jennifer Biretz at (208) 332-8000 with any questions regarding the licensing requirements to engage in money transmitter activities in Idaho.

Sincerely,



Salvador Cruz  
Financial Institutions Bureau Chief

cc: Jennifer Biretz, Securities Bureau  
Patricia Highley, Securities Bureau

B0713-4905 06/07/2022 1:11 PM Received by ID Secretary of State Lawrence Denney