



Logan Payne

Of Counsel

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Logan is a trusted advisor to market-leading financial institutions, fintech companies, and digital asset firms navigating their most complex and high-stakes regulatory challenges. He has played a defining role in securing national and state banking charters, obtaining key federal and state approvals, structuring first-of-their-kind financial products, and shaping regulatory frameworks for novel financial activities. His work has not only enabled clients to lead in an evolving financial landscape but has also helped shape how regulators assess and oversee emerging financial innovations.

Beyond securing approvals, Logan has successfully guided clients through intensive regulatory examinations, precedent-setting enforcement actions, and politically sensitive congressional investigations, including matters that have shaped the trajectory of both individual businesses and the broader digital asset and financial services industries. His ability to anticipate regulatory priorities and develop proactive engagement strategies has positioned his clients to mitigate risks before they escalate, ensuring regulatory compliance without sacrificing innovation.

Logan also works directly with U.S. and global financial regulators to shape policy, advocate for regulatory clarity, and align oversight with industry realities. His insights have influenced key regulatory discussions on stablecoins, digital asset custody, decentralized finance (DeFi), tokenized real-world assets, and artificial intelligence in financial services, helping define how policymakers regulate financial innovation.

Whether pioneering industry-changing financial products, defending against regulatory scrutiny, or driving the next evolution of financial services, Logan provides the strategic foresight and regulatory mastery that market leaders rely on to build, scale, and defend their businesses in an era of unprecedented regulatory transformation.

Key Matters

Some of the experience represented below may have been handled at a previous firm.

Chartering, Licensing, and Approvals

- **National Bank and National Trust Bank Charters:** Logan Payne has led the legal strategy for securing national bank and trust bank charters from the Office of the Comptroller of the Currency (OCC) for institutions pioneering financial and digital asset innovation. His deep understanding of prudential regulatory expectations allows him to anticipate and address supervisory concerns, ensuring that applicants not only meet but exceed the OCC's standards for capital, risk management, and governance. His work has set regulatory benchmarks for digital asset firms and financial technology (fintech) companies seeking to integrate into the federal banking system.
- **Federal Regulatory Approvals:** Logan has successfully secured key federal approvals critical to bank formation, expansion, and acquisition, including deposit insurance from the Federal Deposit Insurance Corporation (FDIC), Change in Bank Control Act (CIBCA) approvals for bank acquisitions, and Bank Holding Company Act (BHCA) applications for structuring and reorganizing financial institutions. He has navigated heightened regulatory scrutiny for fintech and digital asset firms seeking to integrate into the banking system. His strategic approach has enabled first-of-their-kind transactions and ownership structures, setting the standard for how fintech and digital asset firms engage with the banking sector.
- **State Bank and Limited-Purpose Trust Company Charters:** Logan has been instrumental in securing state banking charters for institutions engaged in digital assets, including New York's limited-purpose trust company charters and Wyoming's Special Purpose Depository Institution (SPDI) charters. His ability to structure regulatory strategies that align with evolving supervisory expectations has shaped how state banking regulators assess digital asset-focused applications, positioning his clients at the forefront of financial innovation.
- **State Money Transmission, Virtual Currency, and Lending Licenses:** Logan has designed and executed multi-state licensing strategies that have enabled digital asset firms, payments companies, and fintech lenders to expand while maintaining compliance with evolving regulatory frameworks. He has successfully secured money transmitter, virtual currency, and lending licenses across all 50 states and U.S. territories, including New York's BitLicense. His ability to engage with regulators and develop scalable compliance frameworks has allowed firms to efficiently enter new markets while ensuring long-term regulatory adaptability.

Structuring and Regulatory Approval of Innovative Financial Products

- **Stablecoins and Tokenized Deposits:** Logan has led the legal strategy behind widely adopted stablecoin frameworks, securing regulatory approval for issuers, banks, and payment providers operating in complex and evolving legal environments. His work has contributed to shaping industry best practices for reserve backing, financial reporting, and risk management, ensuring alignment with prudential banking standards. His advocacy has played a role in informing regulatory discussions on stablecoins at both federal and state levels.
- **Digital Asset Custody and Trading Platforms:** Logan has advised on the structuring of custody solutions and trading platforms that have influenced regulatory expectations for banks, fintech companies, and digital asset firms. He has successfully navigated overlapping regulations and guidance from the federal banking agencies and

the Securities and Exchange Commission (SEC), along with state regulatory frameworks, developing innovative custodial models that preserve operational flexibility while ensuring compliance with evolving governance and risk management expectations.

- **Banking and Digital Asset Integration:** Logan has developed compliant models for banks integrating digital assets into their services, including bank-issued stablecoins and tokenized deposits, digital asset lending, and blockchain-based payment solutions. His legal frameworks have helped institutions navigate the intersection of traditional banking and decentralized finance (DeFi) and contributed to regulatory discussions on the role of banks in digital asset markets.
- **Embedded Finance and Banking-as-a-Service:** Logan has advised on the legal and regulatory frameworks for leading embedded finance and Banking-as-a-Service (BaaS) platforms, ensuring compliance with OCC, FDIC, FRB, and state banking laws while mitigating third-party risk exposure. His work has helped define regulatory expectations for fintech-bank partnerships and embedded financial services.
- **Decentralized Finance and Web3 Financial Products:** Logan advises on DeFi platforms, non-custodial financial products, and decentralized autonomous organizations (DAOs), helping clients build regulatory strategies in an area where legal standards are still taking shape. His ability to anticipate future regulatory developments has helped firms align their business models with emerging compliance expectations while maintaining adaptability.
- **Tokenized Real-World Assets:** Logan has worked with financial institutions, technology firms, and issuers to develop tokenized financial products that align with banking, securities, and commodity regulations. His work has helped create legal frameworks for the tokenization of gold, silver, intellectual property, real estate, collectibles, and other assets, and has contributed to regulatory discussions on the future of tokenized finance.

Regulatory Advocacy, Examination, and Enforcement

- **Regulatory Advocacy and Policy Engagement:** Logan works directly with U.S. and global financial regulators on digital assets, banking innovation, and fintech integration. His comment letters and regulatory advocacy have helped clarify regulatory ambiguities and contributed to adjustments in supervisory expectations related to stablecoin oversight, digital asset custody, cloud computing, and artificial intelligence in financial services. His engagement has allowed clients to prepare for regulatory changes before they materialize, reducing compliance risks in an evolving landscape.
- **Regulatory Examinations and Supervisory Engagement:** Logan has guided financial institutions, fintech firms, and digital asset companies through regulatory examinations conducted by the OCC, FRB, FDIC, Financial Crimes Enforcement Network (FinCEN), New York Department of Financial Services (NYDFS), and state banking regulators. His ability to anticipate examination priorities and structure proactive engagement strategies has helped clients meet regulatory expectations while minimizing supervisory concerns. His work has contributed to shaping examination standards for digital asset-related activities.
- **Regulatory Enforcement Defense and Crisis Management:** Logan has represented banks, fintech firms, and digital asset companies in complex enforcement matters, successfully resolving cases involving anti-money laundering (AML) and Bank Secrecy Act (BSA) compliance, sanctions overseen by the Office of Foreign Assets Control (OFAC), third-party risk management, consumer protection, and unauthorized banking activities. His ability to negotiate favorable outcomes and develop regulatory remediation strategies has allowed clients to meet compliance mandates while preserving their business operations. In cases of heightened regulatory scrutiny, he has intervened early to mitigate risks and, in some instances, helped prevent enforcement actions from being initiated. His work has provided guidance on enforcement trends, helping firms navigate evolving regulatory expectations.
- **Congressional and Multi-Agency Investigations:** Logan has advised financial institutions and digital asset firms facing congressional inquiries and multi-agency investigations where legal, regulatory, and political risks converge. He has prepared executives for testimony, drafted congressional responses, and managed complex parallel investigations involving banking regulators, enforcement agencies, and legislative oversight committees. His ability to navigate politically sensitive regulatory scrutiny has protected clients from reputational and operational harm while informing broader industry responses to regulatory and legislative investigations.

Credentials

EDUCATION

Logan received his J.D. from the University of Virginia School of Law. He received his B.A. from the University of Florida.

ADMISSIONS

- District of Columbia
- Texas
- New York

Related Insights & News

- Author, University of Chicago *Legal Matters in Web3: A Desk Reference*, “BSA/AML” Chapter (September 2024)

BLOG

Federal Reserve Withdraws Crypto-Asset Guidance: Policy Shift or Policy Compromise?

APRIL 25, 2025

IN THE MEDIA

Logan Payne Discusses Cryptocurrency Debanking with *Unchained*

FEBRUARY 11, 2025

Capabilities

