

## ANTI-FINANCIAL CRIME TOOLKIT:

### Crypto requests for information (RFIs) and subpoenas

Information requests and subpoenas to U.S. cryptoasset-related businesses have increased significantly in recent years. As cryptoassets have become a more recognized part of the broader financial system, the necessity for law enforcement and government agencies to request evidence and share intelligence has become more pressing.

ACAMS created the **Crypto requests for information (RFIs) and subpoenas** toolkit with the assistance of public and private sector partners to help address some of the commonly observed challenges in this space., notably: i) **Creating elements of a good request for information**, ii) **Collaborating beyond formal requests**, and iii) **addressing lack of understanding**.

#### A few key takeaways from our toolkit include:

- Understand the business model of the firm you are approaching. If you do not understand the institution's business model, reach out to the institution and ask them to explain it. Most cryptoasset institutions would be happy to engage like this on the front-end and save everyone time and resources on the back end. Include essential pieces of information in your request.
- Once the business model is understood and what records are available, you need to understand the essential elements of the request for the institution to be able to identify the client, account and/or transactions you are looking for and provide you with the requested information.
- Maximize your request by understanding and requesting relevant digital information. Once the business model and how to appropriately structure the request to get the information is understood, its important to then maximize the information you receive to potentially help the investigation. To do so, engaging with the institution to understand what information they collect and retain beyond "know your customer" and other customer due diligence information will be valuable.

By utilizing this toolkit, law enforcement can strengthen their information requests, leading to faster access to the desired information. Cryptoasset institutions, in turn, can receive additional context on investigations, enabling them to better manage risk and furnish valuable information to law enforcement via SARs. Ultimately, through information sharing and public-private partnerships, both law enforcement and cryptoasset institutions can more efficiently identify and pursue criminal organizations.

Instead of waiting for law enforcement to make a request before engaging, cryptoasset institutions can proactively assist themselves by preparing and organizing this information beforehand. Numerous institutions have created concise documents or webpages outlining their business models, record-keeping practices, key components of a request, and the digital interactions they capture. Sharing this information with law enforcement in advance, or shortly after receiving a request, will save the institution and law enforcement time and resources.

Read the toolkit [here](#).