

Cryptocurrency Services

REVIEW GUIDE 2023

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Objective

The aim of the Cryptocurrency Services Review 2023 is to:

- List the most important cryptocurrency services – exchanges, wallet providers and payment processors - along with the latest contact details and the country where the company is registered;
- Recommend the best approach to request data from these cryptocurrency services;
- Describe significant changes in relation to the 2020 survey;
- Assess the level of cooperation with law enforcement.

Methodology

The survey on cryptocurrency services measures the response quality and response time of cryptocurrency services to law enforcement requests. International law enforcement agencies have also indicated in the survey what the companies required, such as legal documentation, before they complied to a request for information or asset freeze.

The survey was sent in August 2023 to all European Union Member States, Europol's operational partners and some selected partners with a working or strategic arrangement with Europol.

Europol addressed the survey directly to law enforcement cryptocurrency experts and through SIENA. By late October 2023 Europol had received 56 completed surveys from Law Enforcement Agencies (LEAs) in 35 countries. This is significantly less than for the last survey in 2020. However, for this version we have received more consolidated answers than last time, i.e. one response for an entire agency, instead of sixteen from individual employees of one agency. We believe the answers received this time are more representative of entire departments, agencies, and even countries.

Report Dissemination

- Strictly to Law Enforcement Only
- Through the Liaison Bureaux of EU Member States and countries with Operational and Working Agreements
- Input to this report, such as contact information and experiences, will be used to update the [exchanges list](#) on the [Europol Platform for Experts \(EPE\)](#)¹.

Please contact o3@europol.europa.eu if you need access to EPE.

¹ <https://epe.europol.europa.eu/group/vc-le-only/exchanges>

Overall results and interpretation

- Most of the LEAs responses included experiences on over ten companies. In total, 1135 evaluations of companies were made.
- Whether a company receives a large number of requests from LE could have either positive or negative connotations:
 - Generally, if a company has many clients, it will attract a larger volume of LE requests;
 - If a company has a large amount of suspicious activity, the company will receive many LE requests;
 - If a company provides valuable information via voluntary disclosure, it will receive more requests.
- Therefore, to understand the level of cooperation, we have to focus on the nature of the LE responses:
 - Quantitative – summarised by the Table 1 on the next pages
 - Only services that received feedback **five times or more** were included;
 - Higher ratings suggest better cooperation with LEAs;
 - Services that received a rating of 3.5 or higher are highlighted in **green**;
 - Services that received a rating between 2.5 and 3.5 are highlighted in **orange**;
 - Services that received a rating of 2.5 or lower are highlighted in **red**.
 - Tables 2 and 3 present the Top/Bottom 10 exchanges ordered by Response Quality and Time.
 - Services highlighted in green appear in both Top 10 for response Quality and Time.
 - Services highlighted in red appear in both Bottom 10 response Quality and Time.
- The grading method used to evaluate the quality of the response received was as follows:
 - 4 points – very useful information
 - 3 points – useful information
 - 2 points – limited information
 - 1 points – useless information
 - 0 points – no reaction whatsoever

However, for each question, we have calculated the average points and scaled it to 5 (to facilitate comparison with response time average). The average Response Quality score obtained for all exchanges with 5 or more answers is **3.34**.

- The grading used to evaluate the response time was as follows:
 - 5 points – response within 3 days
 - 4 points – response within 1 week
 - 3 points – response within 1 month
 - 2 points – response within 6 months
 - 1 points – response over 6 months

- 0 points – no reaction whatsoever

For each question, we added all points and divided by the number of responses.

The average Response Time score obtained for all exchanges with 5 or more answers is **3.15**

- Qualitative – summarising the input received from LEAs' responses - shared on pages 10 – 45, which provides context on a service's score.
- Important to emphasise is that different entities (exchanges / payment processors / wallets) store different types and amounts of data on their clients. Most respondents have taken this factor into account (for example, they understood that payment processors may not directly be able identify the suspect) when evaluating the companies.

LEAs evaluation of Cryptocurrency Services

Exchange	Number of Responses	Avg Quality	Avg Response Time
Binance	58	4.85	4.69
Coinbase	46	4.48	3.98
Kraken	37	3.75	3.38
Huobi	36	1.98	1.97
OKX (formerly OKEX)	34	4.01	4.06
KuCoin	33	2.50	1.79
Crypto.com	32	3.20	2.84
Bitstamp	23	3.86	3.48
Whitebit	23	3.53	2.83
Changenow	21	3.04	3.86
Paxful	20	3.63	3.05
Bybit	20	2.75	2.85
HitBTC	19	2.24	2.05
Coinpayments	18	3.61	3.33
Poloniex	17	3.60	3.12
Gate.io	17	2.72	2.76
Luno	17	2.72	2.71
Bitpay	16	3.98	4.00
FixedFloat	16	3.75	4.31
MEXC	16	2.97	2.50
Wirex	15	4.25	3.40
Bitfinex	15	3.50	3.33
Coingate	14	3.57	3.71
Revolut	13	4.71	4.46
Localbitcoins (will cease operations)	13	3.65	2.69
Bitpanda	13	3.56	3.38
Gemini	13	2.98	3.31
Bittrex	12	3.33	3.08
Moonpay	12	3.13	3.08
Blockchain.com	12	2.50	2.83
Remitano	10	3.63	3.80

Coinspaid	10	3.00	3.10
Exmo	9	4.17	4.00
Switchain	9	2.92	3.11
BitMEX	9	1.81	2.00
Kyrrex	9	1.67	2.33
Coinify	8	4.06	4.00
Tether	8	3.59	3.75
Paybis	8	3.28	3.00
Simpleswap	7	4.11	4.86
Uphold	7	3.75	3.57
Bit2Me	7	3.57	3.29
CEX.io	7	3.21	3.71
WazirX	7	3.21	2.57
Coinmate	7	3.04	2.00
N.exchange	6	3.33	2.33
Any.cash	6	3.13	3.33
Deribit	6	2.50	3.00
Shakepay	5	4.50	3.20
Zebpay	5	4.25	3.60
zondacrypto	5	4.25	3.00
Kriptomat	5	4.00	4.00
Nexo	5	4.00	2.60
Bitbuy	5	3.75	3.80
Coinmama	5	3.75	3.20
Stake.bet	5	3.75	3.20
Bitcoin.de	5	3.50	3.60
Bitso	5	2.25	2.00
Kuna	5	2.25	2.00
OKCoin	5	1.75	1.80
BTCTurk	5	1.50	1.60

Table 1 Exchanges Quality and Response Time ordered by Number of responses received (minimum 5)

TOP 10					
Exchange	Number of Responses	Avg Quality	Exchange	Number of Responses	Avg Response Time
Binance	58	4.85	Simpleswap	7	4.86
Revolut	13	4.71	Binance	58	4.69
Shakepay	5	4.50	Revolut	13	4.46
Coinbase	46	4.48	FixedFloat	16	4.31
Wirex	15	4.25	OKX (formerly OKEX)	34	4.06
Zebpay	5	4.25	Exmo	9	4.00
zondacrypto	5	4.25	Coinify	8	4.00
Exmo	9	4.17	Kriptomat	5	4.00
Simpleswap	7	4.11	Bitpay	16	4.00
Coinify	8	4.06	Coinbase	46	3.98

Table 2 Top and Bottom 10 Exchanges ordered by Response Quality

BOTTOM 10					
Exchange	Number of Responses	Avg Quality	Exchange	Number of Responses	Avg Response Time
Blockchain.com	12	2.50	Kyrrex	9	2.33
Deribit	6	2.50	HitBTC	19	2.05
Bitso	5	2.25	Coinmate	7	2.00
Kuna	5	2.25	Bitso	5	2.00
HitBTC	19	2.24	Kuna	5	2.00
Huobi	36	1.98	BitMEX	9	2.00
BitMEX	9	1.81	Huobi	36	1.97
OKCoin	5	1.75	OKCoin	5	1.80
Kyrrex	9	1.67	KuCoin	33	1.79
BTCTurk	5	1.50	BTCTurk	5	1.60

Table 3 Top and Bottom 10 Exchanges ordered by Response Time

Biggest differences 2020 vs. 2023					
Exchange	Number of Responses	Better score in %	Exchange	Number of Responses	Worse score in %
OKX (formerly OKEX)	34	400,74%	Bitcoin.de	5	75,27%
Exmo	9	212,31%	KuCoin	33	76,92%
Remitano	10	184,71%	Luno	17	80,31%
Poloniex	17	182,43%	CEX.io	7	81,89%
Blockchain.com	12	165,29%	HitBTC	19	83,62%

Table 4 Top and Bottom 5 Exchanges compared to 2020 Cryptocurrency Services Review

Key Observations

- We received **1 135 evaluations** of cryptocurrency services to this survey. 1 022 evaluations were in relation to a default list of exchanges, the 113 other responses were in relation to exchanges not listed by Europol. The **top 10 companies**, in terms of times encountered by LEA, **received 30,22% of all evaluations**. In 2020 this was around 50%, showing that **an increasing amount of cryptocurrency services are now encountered in investigations**.
- **Investigators encounter more cryptocurrency services than before**. In the 2020 survey, 78 companies were mentioned. In this survey, investigators had encountered 145 companies. Only 61 companies, however, received more than 5 responses. Information on other companies will be included on the [exchanges list](#) on the [Europol Platform for Experts \(EPE\)](#).
- **Binance** is the **top scorer on response quality**, followed by Revolut, Shakepay, Coinbase, and Wirex. **Simpleswap** is the **top scorer on response time**, followed by Binance, Revolut, FixedFloat, and OKX.
- Every respondent, except one, has sent a request to Binance. For the last survey, this was two out of three respondents.
- LocalBitcoins was very frequently encountered in the 2020 survey, but has now ceased its operations and was not mentioned as often. Other companies that were mentioned more than ten times last time, but received less than five responses this time: Xapo, Cryptopay, and Shapeshift.
- **Some companies demonstrate further professionalisation in dealing with law enforcement requests**. This is, for example, **exemplified by the arrival of platforms specifically aimed at streamlining communication** between law

enforcement and cryptocurrency companies (such as Kodex). Also, the establishment of **investigations teams and hiring of former law enforcement** has increased since 2020 at some companies. However, it remains to be seen whether these priorities will remain in place.

- **Many companies are based in off-shore countries**, especially in the Seychelles, but also in the British Virgin Islands and the Marshall Islands, and others. Fortunately, most of these companies accept requests via email, as MLAT procedures to such countries are lengthy. However, some still request MLATs, which delays investigations. Gathering (initial) information from FIUs can sometimes help, but can not be used in legal proceedings. **In the EU, many companies register in Lithuania.**
- **Many companies let nested services use their liquidity.** Nested services are companies that operate by using the liquidity of one or more other exchanges. This means that cryptocurrency tracing can make it appear as if funds end-up at a certain exchange, but in reality the funds went to a company using the liquidity of that exchange. The exchange where the service is nested then likely only holds KYC information on the people who run the service, not on its customers. Changelly is for example a nested service, as it (partly) uses HitBTC's liquidity.
- **As in 2020, some large companies again receive very low scores.** Two of these are in the top 10 when it comes to times mentioned by LEA: Huobi (HTX) and KuCoin. Other companies that have a very low score for the second time are: HitBTC, BitMEX, OKCoin, and BTCTurk. OKX was one of the worst scorers in the last survey, but has significantly improved its response quality and response time in 2023. Exmo and Remitano also significantly improved their score. Bitcoin.de, KuCoin and Luno scores became significantly worse.
- The results of the survey are in line with personal experiences of cryptocurrency experts at Europol.
- The detailed overview and evaluation of cryptocurrency services starts on the next page.

List of exchanges and other services

Any.cash

Contact: support@any.cash

URL: <https://any.cash>

Country: unknown

Number of Responses: 6

Quality Rating: 3.13 (useful: 3 limited info: 3)

Any.cash advertises itself as a bot that offers 'convenient and secure digital wallet on Telegram', without fees. Their Website is offered in Ukrainian, Russian, Kazak, Arabic and English.

Any.cash scores slightly below average on response quality and slightly above average on response time.

Any.cash has indicated they want a 'stamped / signed request' and a copy of the law enforcement request in editable format, to gather information quickly. Some respondents found the information useful, whereas others indicated that information provided was limited.

Binance

Contact: <https://app.kodexglobal.com/binance/signup> - standard requests; investigations@binance.com – for more complex/urgent/exigent matters; <https://www.binance.com/en/support/law-enforcement> - Government Law Enforcement Request System

URL: <https://www.binance.com>

Country: registrations in various EU countries, such as France, Italy, Lithuania, Spain, Poland and Sweden.

Number of Responses: 58

Quality Rating: 4.85 (very useful: 51 useful: 7)

Binance is the largest cryptocurrency exchange in the world based on transaction volume. The number of law enforcement interactions reflect this, as every single respondent

except one indicated that they have interacted with Binance. Binance was the highest scorer on response quality and second on response time.

Binance offers many products and services, such as Binance Card, Binance Pay, over-the-counter (OTC) trading, a peer-to-peer (P2P) marketplace, native token BNB, and more. These products are reflected in the information Binance provides when information is requested. The Excel file an investigator receives includes tabs with, amongst other, the following information: *customer information, account balance (split in Spot, Futures, Earn, Fiat, Margin, and Pool), current assets and wallets, order history, deposit history, fiat deposit history, withdrawal history, fiat withdrawal history, P2P, access logs, approved devices, KYC documents, OTC payment, funding wallet*. Various documents produced by Binance on law enforcement cooperation and the types of data they provide are available in the LE ONLY cryptocurrency group on EPE².

Whereas before all communication came through case@binance.com, this email address is no longer used. Binance now uses the Kodex platform for all requests. Kodex is a workflow management tool, used by exchanges to verify the validity of law enforcement requests and is in late 2023 also used by companies such as Coinbase and MoonPay. Subpoena or letterhead requests are generally required by Binance, often with an official stamp and signature from a prosecutor.

Many respondents found the process to request information at Binance simple and efficient. In general, the company was responsive and quick to assist. On some occasions, assistance was even given over the phone. Also, access to the investigations team for complex cases was considered very useful.

The data provided by Binance sometimes even included IP data and transaction data when only KYC information was requested. One respondent mentioned that a user's account was blocked, even when only registration data was requested. In this case it was not problematic, but this may be an issue in more sensitive cases.

Binance has received a license in some countries, for example France, but this has in some cases led to the fact that information can now only be provided with official legal requests through official channels (EIO for example) and not simply by sending local subpoenas through email.

Some issues were reported regarding local subsidiaries of Binance, specifically in Türkiye and Poland. Also, data on OTC trades has sometimes been reported as missing or unclear. One respondent mentioned that sometimes not all information is provided, due to a lack of knowledge of staff.

At the time of the last Cryptocurrency Services Review in 2020 Binance had not implemented KYC for unverified users withdrawing funds under 2 bitcoins. In 2021, this changed to 0,06 bitcoins. Also, since 2021, Binance has hired many investigators coming from law enforcement.

² <https://epe.europol.europa.eu/group/vc-le-only/library>

Binance is actively promoting their cooperation with law enforcement agencies and their representatives are in recent years frequently attending events organised by Europol and other law enforcement agencies.

Bit2Me

Contact: info@bit2me.com / compliance@bit2me.com

URL: <https://bit2me.com/>

Country: Spain

Number of Responses: 7

Quality Rating: 3.57 (very useful: 1 useful: 5 useless: 1)

Bit2Me is a Spanish cryptocurrency company that offers a range of products such as a payment card, help in filing cryptocurrency taxes, and processing instant payments.

One respondent mentioned that it was possible to freeze assets at this exchange through the FIU. According to a Spanish liaison officer at Europol, Bit2Me cooperates well.

Bitcoin.de

Contact: authorities@bitcoin.de

URL: <https://www.bitcoin.de/>

Country: Germany

Number of Responses: 5

Quality Rating: 3.50 (very useful: 2 useful: 2 no response: 1)

Bitcoin.de is the biggest German exchange and has been around since 2011. Only five responses mentioned the exchange in the 2023 survey, compared to 25 in 2020. This may indicate a diminishing popularity of the platform, but also shows that a lot of German investigators took the survey in 2020.

Bitcoin.de scores above average on response quality and time, but lower than in the last survey.

The exchange can receive information requests in German and English and will respond in the same language.

Bitfinex

Contact: inforequests@bitfinex.com

URL: <https://www.bitfinex.com/>

Country: British Virgin Islands, Hong Kong

Number of Responses: 15

Quality Rating: 3.50 (very useful: 3 useful: 7 limited info: 4 useless: 1)

Bitfinex is a large international exchange that has been in operation since 2012. Bitfinex is closely related to stablecoin issuer Tether and as of October 2023 these companies share the same CEO. On the one hand, Bitfinex has shown eagerness to work with law enforcement by for example attending cryptocurrency events at Europol, since these started back in 2014. On the other hand, there has been controversy around their relation to stablecoin issuer Tether. For example, the exchange has previously been investigated by the New York State Attorney General and was ordered to stop operating in New York and pay a fine of USD 18.5 million.

Still, more positive than negative LEA experiences with Bitfinex were reported in this year's survey. To provide information, Bitfinex requires an official law enforcement request with a stamp and signature. Bitfinex has also frozen funds based on a prosecutor's request, which has saved investigators from drafting MLATs.

The quality of law enforcements' cooperation with Bitfinex varies case-by-case. One respondent stressed that Bitfinex has alerted customers after a law enforcement request, even when it was asked not to do so. This can significantly hamper law enforcement investigations.

In another case, funds were successfully frozen, but Bitfinex did not provide client data, claiming to be unable to do so due to GDPR.

Bitfinex scored just above average when it comes to response time.

BitMEX

Contact: support@bitmex.com

URL: <https://www.bitmex.com/>

Country: Seychelles

Number of Responses: 9

Quality Rating: 1.81 (useful: 1 limited info: 4 useless: 2 no response: 2)

BitMEX is a platform for cryptocurrency derivative trading. In 2021 and 2022 the three founders of BitMEX have plead guilty to charges in relation to the US Bank Secrecy Act,

mainly in relation to a lack of anti-money laundering measures at the company. This is reflected in the survey results of BitMEX, as the company scores low.

While there is a slight improvement from 2020, when BitMex scored even lower, the results are still below par.

A few LEAs were able to gather information from BitMEX through the FIU Seychelles. However, KYC and transaction information was sometimes missing. For certain countries, such as Switzerland, a lawyer has been designated to process requests. In most cases, a prosecutor letter was needed. Some law enforcement agencies have sent MLATs to the Seychelles.

HDR Global Trading Limited is BitMEX's parent company, incorporated in the Seychelles. BitMex has confirmed to EC3 they are based in the Seychelles.

Bitpanda

Contact: risk@bitpanda.com

URL: <https://www.bitpanda.com/en>

Country: Austria

Number of Responses: 13

Quality Rating: 3.56 (very useful: 4 useful: 6 limited info: 1 useless: 1 no response: 1)

Bitpanda is the largest Austrian exchange and mainly offers cryptocurrency buying and selling and a cryptocurrency debit card. However, it seems to be moving to become a more all-round investment platform as it also offers Bitpanda Stocks, commodities, crypto index, precious metals and leverage. Most of these assets are investments in contracts replicating underlying stock, Exchange Traded Funds (ETFs), Exchange Traded Commodities (ETCs) or metals. Users with the Bitpanda Card can spend any of these assets, not just cryptocurrency.

Bitpanda has a slightly above average score. Some European LEAs managed to obtain initial information from Bitpanda first via the FIU Austria, or even email. This information could then be used to decide if an official request is needed.

Most other respondents mentioned that an EIO or MLAT had been sent. Such requests should go directly to Bitpanda, Austrian law enforcement does not need to be involved any more on this, as was the case previously.

To avoid unwanted account suspensions, the request must mention that no measures should be taken on the suspect accounts.

Bitpay

Contact: subpoenas@bitpay.com / legal@bitpay.com

URL: <https://bitpay.com/>

Country: The Netherlands and United States

Number of Responses: 16

Quality Rating: 3.98 (very useful: 6 useful: 7 limited info: 3)

BitPay is perhaps the most well-known cryptocurrency payment processor. Bitpay facilitates online payments in cryptocurrency, i.e. it enables users to use cryptocurrency as if it were fiat money online. BitPay also issues a crypto debit card.

BitPay is one of the faster companies when it comes to response time, they are in the top 10 of this survey. Still, some participants mentioned that their responses were sometimes incomplete. However, others commented they received a proper response within one hour of sending their request. For US agencies, a subpoena is needed to obtain information from Bitpay.

In the past, BitPay has locked down accounts due to law enforcement request, which can alert suspects and be detrimental to investigations. However, according to one respondent, contact with law enforcement appears to have improved recently. Bitpay's rating in the survey is almost the same as the rating they received in 2020.

BitPay's EU presence is in Utrecht in the Netherlands.

Bitstamp

Contact: compliance@bitstamp.net

URL: <https://www.bitstamp.net/>

Country: Luxembourg

Number of Responses: 23

Quality Rating: 3.86 (very useful: 10 useful: 9 limited info: 2 no response: 2)

Bitstamp has been in operation since 2011. Bitstamp was founded in Slovenia, but is now registered in Luxembourg. It also has entities in the United Kingdom and the United States. Bitstamp mostly offers exchange services, but also offers Bitstamp as a Service, where they provide parties with infrastructure and support to enter the cryptocurrency market.

Bitstamp can be easily reached through the above email address. However, they will only provide information on account holders through Cellule de Renseignement Financier (CRF), the Luxembourgian FIU. This was the unanimous experience of respondents in the

survey. This approach is problematic for some countries, where cooperation between FIUs and law enforcement agencies is not optimal and may lead to delays.

Bitstamp collaborates well with law enforcement and has attended Europol events since 2015.

Bittrex

Contact: lerequests@bittrex.com

URL: <https://bittrexglobal.com/>

Country: Lichtenstein, United States

Number of Responses: 12

Quality Rating: 3.33 (very useful: 3 useful: 6 useless: 2 no response: 1)

Bittrex was founded in 2014 and has since 2019 been in operation in Liechtenstein (Bittrex Global) for its European customers. Another entity (Bittrex, Inc) in Seattle, USA has been operating for US operations. In April 2023, Bittrex, Inc filed for bankruptcy protection, after the US Securities Exchange Commission (SEC) had accused it of operating an unregistered securities exchange. In August 2023, Bittrex, Inc settled with the SEC. Bittrex Global is still operating in the EU.

Bittrex had an average score in the 2023 survey. Several LEAs mentioned that they had to send an MLAT to Liechtenstein or use Europol channels (SIENA) to send a request to the Liechtenstein National Police. Liechtenstein is represented at Europol by the Swiss liaison bureau, so requests can be channeled through them. Some countries mentioned they could obtain relevant information through Interpol's office in Vaduz, Liechtenstein.

Some LEAs mentioned that it can be difficult to assess whether customers hold accounts on Bittrex, Inc or Bittrex Global. As this affects the way in which to send a request, it can significantly slow an investigation down. Also, LEAs outside of the EU or US had more difficulties in obtaining information.

Blockchain.com

Contact: legal@blockchain.com / lawenforcement@blockchain.com

URL: <https://www.blockchain.com>

Country: Lithuania, Ireland, British Virgin Islands

Number of Responses: 12

Quality Rating: 2.50 (very useful: 2 useful: 2 limited info: 4 useless: 2 no response: 2)

Blockchain.com is a large wallet provider in operation since 2011 that has also started offering exchange services in 2019. Blockchain.com also offers OTC services, a Blockchain.com Visa Card and according to its website, it is about to launch a NFT marketplace and 'pay' functionality, which will let other apps use Blockchain.com's infrastructure to buy or sell cryptocurrency.

Blockchain.com's rating improved since 2020, but is still below average. The rating may be low in part because the lack of clarity around their location and best practices in cooperation. Currently, Blockchain.com has three legal entities to which requests (MLAT or 'letter rogatory') can be addressed: Blockchain UAB (Lithuania), Blockchain Access Limited (Ireland), Blockchain.com Limited (British Virgin Islands). LEAs from one of these countries can send requests directly to lawenforcement@blockchain.com.

According to one LEA, requests sent through SIENA to Lithuanian law enforcement led to full user data. This included KYC, BSI and IP logs. Information could also be obtained through the FIU. Other countries needed to send an MLAT, subpoena or production order.

BTCTurk

Contact: destek@btcturk.com

URL: <https://kripto.btcturk.com/en> (exchange app); <https://btcturk.com/en/> (other services)

Country: Türkiye

Number of Responses: 5

Quality Rating: 1.50 (very useful: 1 limited info: 1 no response: 3)

BTCTurk is the main exchange operating with a focus on Türkiye. BTCTurk was founded in 2013. Next to basic exchange of cryptocurrencies for Turkish Lira, it also offers trades of Tether (USDT) to other cryptocurrencies and operates an OTC desk. Since the 1st of July 2023, BTCTurk is a registered trademark with various companies under it: *Kripto*, *Hisse*, *Destek* and *Teknoloji*. These offer different services. *Hisse*, for example, is used to buy and sell stocks.

BTCTurk was the lowest scoring exchange on both response time and response quality.

Most countries have difficulties in receiving information from BTCTurk. Both police emails and MLATs led to limited info and / or no answer from the Turkish exchange.

Bybit

Contact: support@bybit.com; compliance@bybit.com; law_enforcement@bybit.com;
<https://www.bybit.com/en-US/help-center/s/webform> (select 'Law enforcement request')

URL: <https://www.bybit.com/>

Country: British Virgin Islands (registration), Singapore, Hong Kong, Taiwan (offices)

Number of Responses: 20

Quality Rating: 2.75 (very useful: 2 useful: 8 limited info: 5 useless: 2 no response: 3)

Bybit is a cryptocurrency derivative trading platform established in March 2018. It is registered in the British Virgin Islands, but has offices in Singapore, Hong Kong and Taiwan. There is some unclarity surrounding their location. For example, their legal terms state that they are governed by the laws of Singapore, but at the same time, Bybit does not offer services to people in Singapore.

Bybit scores below average. Many respondents commented on the lack of useful KYC or traffic data. Bybit generally simply returned transaction data. However, the amount of useful data can differ per requested account.

Bybit scores slightly better on response time, but still below average.

In most cases, Bybit seems to respond to EU agencies, but not as often to non-EU agencies. Bybit only processes requests of verified law enforcement domains and sometimes asks for 'special agent verification'. One country reported that a letterhead request was sufficient for non-personal data and personal data within jurisdiction, while an MLAT was needed for personal data from a subject not from the requester's jurisdiction.

Law enforcement in the Netherlands can request data of Bybit customers through Satos, a Dutch cryptocurrency exchange. Bybit collaborates with Satos, who have a registration with the Dutch National Bank.

CEX.io

Contact: fiu@cex.io

URL: <https://cex.io/>

Country: United States, Gibraltar, Lithuania

Number of Responses: 7

Quality Rating: 3.21 (very useful: 2 useful: 3 useless: 1 no response: 1)

CEX.io is an international exchange that is active since 2013 and offers a number of cryptocurrencies and conversion to USD, EUR, GBP and RUB. According to its website, it is about to launch a CEX.io debit card in early 2024.

CEX.io response quality is slightly below average, but its response speed is above average.

CEX.io corporate structure is complex and has various companies to serve customers in different companies: CEX.IO Corp. (US customers, based in US), CEX.IO Limited (EU customers, based in Gibraltar), CEX.IO EU VASP, UAB (EU customers, based in Lithuania), and CEX OVRS LLC (global customers, Saint Kitts and Nevis).

One EU agency managed to obtain records through the FIU. Other EU agencies were able to obtain information through the above email address. US agencies need subpoenas to obtain information.

Changenow

Contact: support@changenow.io; compliance@changenow.io

URL: <https://changenow.io/>

Country: Saint Vincent and the Grenadines (registration), The Netherlands (postal address)

Number of Responses: 21

Quality Rating: 3.04 (very useful: 3 useful: 7 limited info: 9 no response: 2)

Changenow is a company offering instant cryptocurrency exchange. Changenow's exchange services are non-custodial, meaning it does not allow users to store cryptocurrencies on its platform. However, Changenow also offers different services under the name NOW: a cryptocurrency wallet, a cryptocurrency lending service and crypto payments. .

Changenow scores below average when it comes to response quality, but scores quite high on response speed. Most agencies received a response within three days or one week.

Changenow need a unique identification number, a clear description of the case, a clear outline of the requested information regarding transactions and addresses, and a signature or stamp to confirm authenticity. Such letterhead requests may then lead to a quick response that allows investigators to see to what address on another blockchain funds were sent.

Changenow will provide IP data, device information, deposit address, withdrawal address and transaction ID. However, as KYC data is generally not requested of customers they can not provide such information. One agency noted that Changenow asked for an MLAT to the Seychelles when KYC data was available. It appears Changenow is no longer in the

Seychelles, but in Saint Vincent and the Grenadines, and has a postal address in The Netherlands.

Coinbase

Contact: <https://app.kodexglobal.com/gov/signup> (Kodex portal);
int.subpoenas@coinbase.com (for queries)

URL: <https://www.coinbase.com/>

Country: United States, Canada, United Kingdom, Ireland, Germany, India

Number of Responses: 46

Quality Rating: 4.48 (very useful: 30 useful: 14 limited info: 1 useless: 1)

Coinbase is one of the largest global and most well-established cryptocurrency companies. Coinbase offers a wide variety of services for individuals including Coinbase exchange, Coinbase wallet, an NFT marketplace, and Coinbase Card. It also offers services for businesses, such as Coinbase Commerce. All of these services can lead to different types of data that may be relevant for LEAs.

Coinbase is one of the high scorers in this survey, as it is third in response quality and fifth in response time.

Coinbase can provide full user data, such as KYC, traffic data, transactions, transaction notes and more. Coinbase has pro-actively assisted law enforcement investigations for many years. In some cases, Coinbase offers it pro-active analyses and intelligence in specific crime areas to law enforcement agencies. It also actively provides tips to investigators how to optimally utilise its data. For example, users that withdraw funds from Coinbase get prompted to add a transaction note to their transaction. In some cases, Coinbase users put remarks in these notes that indicate criminality. Coinbase can search these remarks to support investigations. Also, one respondent mentioned that Coinbase has pro-actively helped on asset recovery in scam cases.

Coinbase uses the Kodex platform for all LEA requests. Still, Coinbase investigations staff are available to assist through the email address listed above. To be able to share information, Coinbase needs an official LE request and a stamp or signature. However, in urgent cases, an initial email might be enough, if it is followed up with an official request. If an EU LEA is seeking information about US customers, an MLAT might be necessary.

Coinbase has been commended for their speed in responding. However, one common complaint about the data they provide is their data formatting. This is considered confusing and non-intuitive to some investigators.

Coinbase has regularly attended EC3 events since 2015.

Coingate

Contact: compliance@coingate.com

URL: <https://coingate.com/>

Country: Lithuania

Number of Responses: 14

Quality Rating: 3.57 (very useful: 1 useful: 10 limited info: 3)

Coingate is a cryptocurrency payment processor, based in Lithuania. Coingate functions as a broker, if a customer wants to pay a company in cryptocurrency. Companies can integrate Coingate as cryptocurrency payments infrastructure. Coingate also offers an exchange functionality and the gift cards that can be bought with cryptocurrencies.

Coingate scores slightly above average on response quality. It has a good score when it comes to response speed.

Coingate can provide information about the payment including company name and order ID, input and output addresses, TxID, email, and IP of the user that made the transaction.

Some countries reported to successfully have sent an EIO or MLAT. However, requests can also be sent via SIENA to Lithuanian law enforcement, which may be quicker.

Coinify

Contact: rbs@coinify.com; legal@coinify.com

URL: <https://www.coinify.com/>

Country: Denmark

Number of Responses: 8

Quality Rating: 4.06 (very useful: 3 useful: 4 limited info: 1)

Coinify is another cryptocurrency payment processor. It was founded in 2014 and is based in Copenhagen, Denmark. Coinify also offers businesses to let their customers buy and sell cryptocurrency, i.e. exchange-as-a-service. Furthermore, it offers a Mastercard cryptocurrency debit card.

Coinify received a good score on response quality and speed.

To share their customers' data, Coinify requested a request signed by a prosecutor. One respondent mentioned that Coinify replied after one day with the following data: merchant name, payment ID, fiat amount, type of currency, description.

Coinmama

Contact: support@coinmama.com

URL: <https://www.coinmama.com/>

Country: Israel

Number of Responses: 5

Quality Rating: 3.75 (very useful: 1 useful: 3 limited info: 1)

Coinmama is an Israeli company founded in 2013 that offers cryptocurrency exchange and an OTC desk.

Coinmama scores slightly above average on response quality, as well as on speed.

Coinmama requires an official request for information with an official stamp on the request, after which it is cooperative.

Coinmate

Contact: support@coinmate.io

URL: <https://coinmate.io/en>

Country: Czech Republic

Number of Responses: 7

Quality Rating: 3.04 (very useful: 2 useful: 3 no response: 2)

Coinmate is an exchange in the Czech Republic that was founded in 2014. Coinmate supports Euros and Czech Koruna as fiat currencies, making it an interesting company for Czech individuals.

Coinmate scores below average in both quality and speed.

Coinmate has been integrated in some Bitcoin ATM operators, such as Generaly Bytes (also Czech) and Lamassu, for cryptocurrency exchange. This is why, when analysing Bitcoin ATM transactions in tracing tools, one may encounter Coinmate.

CoinPayments

Contact: legal@uabsv.com

URL: <https://www.coinpayments.net/>

Country: Lithuania

Number of Responses: 18

Quality Rating: 3.61 (very useful: 4 useful: 11 limited info: 1 useless: 1 no response: 1)

CoinPayments is a large cryptocurrency payment processor for businesses and individuals. CoinPayments is active in over 190 countries and says to have processed over USD 10 billion since 2013. CoinPayments also offers a wallet, payments, a cryptocurrency 'vault', automatically forwarded payments, and more. On its website it boasts testimonials by prominent corporate users such as NordVPN, BitGild and Binance.

CoinPayments has a slightly above average score when it comes to response quality and speed.

UAB Star Ventures is the legal owner of CoinPayments data. According to themselves, UAB Star Ventures will provide information if it is specifically requested and clearly outlined in an official and enforceable court order.

Survey respondents confirmed that an official enforceable court order or MLAT is needed, but in some cases UAB Star Ventures will also respond to police emails. Emergency requests are possible. In some cases, information was received within a day. CoinPayments can provide full KYC, traffic data, transaction lists and more.

Requests for information can also be channeled through SIENA to Lithuanian law enforcement.

Previously, CoinPayments could be contacted through company HODL Tech, but this is no longer the case. In 2022, CoinPayments withdrew its services from the United States.

Coinspaid

Contact: compliance@coinspaid.com

URL: <https://coinspaid.com/>

Country: Estonia, Lithuania, El Salvador

Number of Responses: 10

Quality Rating: 3.00 (very useful: 2 useful: 4 limited info: 2 no response: 2)

Coinspaid is yet another cryptocurrency payment provider. It also offers a business wallet, exchange-as-a-service, and an OTC desk.

Coinspaid scores below average on response quality and speed.

Data of Coinspaid, also known as Cryptoprocessing.com, is held under various other companies: Dream Finance OÜ (Estonia), Dream Finance UAB (Lithuania), and Dream Finance S.A. DE C.V. (El Salvador).

As a payment provider, it generally does not hold KYC data on clients. However, it does redirect to merchants by whom the payment was processed.

Crypto.com

Contact: lawenforcementglobal@crypto.com

URL: <https://crypto.com/>

Country: Malta

Number of Responses: 32

Quality Rating: 3.20 (very useful: 8 useful: 15 limited info: 1 useless: 3 no response: 5)

Crypto.com is a cryptocurrency company that offers cryptocurrency exchange, an NFT marketplace, cryptocurrency VISA cards, payment options, derivatives trading, a native token Cronos (CRO), amongst other things.

Crypto.com scores below average on both response quality and speed.

Crypto.com has indicated they need an official law enforcement request with signatures to the above email address. However, several respondents had to reach out to authorities in Malta to receive information from Crypto.com, either via the FIU or through MLAT. Several respondents mentioned that Crypto.com would not reply to requests without an MLAT. Crypto.com is registered in Malta under the name Foris DAX MT Ltd.

In one case, no response had been received after ten months. One country sent a SIENA to Maltese authorities, but then had to specify that it would only use the data as criminal intelligence. Crypto.com can provide KYC, IP traffic data, transaction lists, and more.

Deribit

Contact: compliance@deribit.com

URL: <https://www.deribit.com/>

Country: Panama

Number of Responses: 6

Quality Rating: 2.50 (very useful: 1 useful: 2 useless: 2 no response: 1)

Deribit is a cryptocurrency company focused on cryptocurrency derivatives, futures and options. Deribit was originally based in The Netherlands, but moved to Panama in 2020.

Deribit does not score well in this survey, both on quality and response time. Perhaps this is the case, because of the lengthy MLAT process to Panama, but this is not clear from answers in this survey.

EXMO

Contact: legal@exmo.com

URL: <https://exmo.com/>

Country: Lithuania, United States

Number of Responses: 9

Quality Rating: 4.17 (very useful: 3 useful: 6)

EXMO is a cryptocurrency exchange that also issues a multicoin wallet, gift cards, and EXMO COIN (EXM).

EXMO scores well and is in the top 10 for both response quality and response time.

EXMO's main entity is in Lithuania: UAB EXMO EXCHANGE, which operates EXMO Platform. The company also has a presence in the United States: EXMO EXCHANGE US INC.

EXMO requires an information request with a prosecutor's signature. It has been commended by survey participants as they in some occasions provided information within a few hours.

FixedFloat

Contact: info@fixedfloat.com

URL: <https://fixedfloat.com/en/>

Country: Seychelles

Number of Responses: 16

Quality Rating: 3.75 (very useful: 5 useful: 6 limited info: 5)

FixedFloat is an exchange that offers swaps from one cryptocurrency to the other.

FixedFloat scores slightly above average when it comes to response quality. When it comes to response speed, they are the fourth best ranking company. They often reply within 24 hours.

FixedFloat does not store KYC data, as they do not hold assets. However, FixedFloat can provide details of coin conversion (asset type and amount), destination address, email address, IP logs and UserAgent.

As of November 2023, FixedFloat allows for the exchange of privacy coin Monero (XMR) to other cryptocurrencies and vice versa.

Gate.io

Contact: regulatory@gate.io

URL: <https://www.gate.io/>

Country: unclear, licenses in Lithuania, Malta, United States

Number of Responses: 17

Quality Rating: 2.72 (very useful: 2 useful: 7 limited info: 3 useless: 2 no response: 3)

Gate.io is a cryptocurrency company founded in China in 2013 that enables the trade of over 1 700 cryptocurrencies. It is also involved in other activities, such as hosting a token launch platform where users can receive airdrops of new tokens. It also facilitates payments, an OTC platform, cloud mining, issues a Gate Visa debit card, sells gift cards, and more.

Gate.io scores low in this survey, especially on response quality, but it also scores below average on response speed.

Since 2017 Gate.io moved out of China. It appears to have European presence in Malta and Lithuania, but also some presence in the United States.

In the survey results, there seems to be a difference between US and non-US responses. For the US the responses by Gate.io are very slow, sometimes they are not responsive at all. A subpoena or official letterhead memo are required. For the EU, some answers from Gate.io came within hours or days. Content, KYC, logs, account balance and other relevant information have been shared. Also, for one EU agency, Gate.io transferred suspect funds to a law enforcement wallet.

Gemini

Contact: lawenforcement@gemini.com

URL: <https://www.gemini.com/eu>

Country: United States

Number of Responses: 13

Quality Rating: 2.98 (very useful: 4 useful: 4 limited info: 1 useless: 1 no response: 3)

Gemini is a US cryptocurrency exchange that also offers a credit card, derivatives trading, and an NFT marketplace.

Gemini scored below average on response quality, but above average on speed. The negative experiences mainly came from EU agencies, as US agencies seem to have good experiences with Gemini.

European agencies need to send an MLAT to the United States to obtain data. US agencies need a subpoena and can freeze funds by sending an email. Gemini provides complete account details.

HitBTC

Contact: legal@hitbtc.com

URL: <https://hitbtc.com/>

Country: Hong Kong

Number of Responses: 19

Quality Rating: 2.24 (very useful: 1 useful: 8 limited info: 2 useless: 2 no response: 6)

HitBTC is a cryptocurrency exchange established in 2013 and based in Hong Kong. It offers exchange of various cryptocurrencies, but also a wallet, futures trading and an OTC desk.

HitBTC is in the bottom 10 both for response quality and response time.

HitBTC asks for official law enforcement requests with a stamp or signature. However, HitBTC often does not reply to requests or it takes a long time to receive an answer. They are more likely to respond when nested services on their platform, such as Changelly, have been used. One agency mentioned that HitBTC provided information that was not related to the user from their request.

Huobi (HTX)

Contact: regulatory@huobi.com

URL: <https://www.htx.com/en-us/>

Country: Seychelles (until October 2023), licenses in various countries (such as Lithuania)

Number of Responses: 36

Quality Rating: 1.98 (very useful: 3 useful: 7 limited info: 9 useless: 6 no response: 11)

Huobi, recently rebranded as HTX, is a cryptocurrency exchange that also offers an OTC desk, P2P trading, derivatives trading, crypto loans, and more. Huobi was founded in 2013 in China. Huobi's corporate entity was registered in the Seychelles for many years until October 2023, when the Seychelles scrapped Huobi off their corporate register. It is unknown whether they will return to the Seychelles. According to their website, Huobi / HTX has licenses in Lithuania, Gibraltar, Dubai, the British Virgin Islands, Australia and 'South America'.

Both in response time and quality Huobi is in the bottom 5 of this survey.

The exchange scored slightly better than in 2020, but still the score is very low. The main problem of Huobi's responses are that they are unreliable, i.e. sometimes they respond and sometimes they do not, or only after months. This has hampered numerous investigations. Sporadically, when Huobi responds, the information is seen as useful. According to various US respondents, Huobi used to be responsive, but has recently stopped responding to them. Surprisingly, other countries have had the opposite experience.

Previously, a common way to obtain information from Huobi was through the Seychelles FIU. Some countries have sent MLATs to the Seychelles, but this procedure to off-shore countries can be very lengthy. Additionally, the Seychelles police has rejected MLATs, which complicates using such information in cases. As Huobi (HTX) is no longer registered in the Seychelles, it is unknown to what jurisdictions requests now need to be sent to.

The head of compliance of Huobi has previously given an online presentation at a cryptocurrency conference in 2022 at Europol.

Kraken

Contact: lawenforcement@kraken.com

URL: <https://www.kraken.com/>

Country: British Virgin Islands, United States, Canada, Australia, Italy, United Kingdom

Number of Responses: 37

Quality Rating: 3.75 (very useful: 13 useful: 14 limited info: 8 useless: 1 no response: 1)

Kraken is one of the largest and oldest still active exchanges, as it was founded in the United States in 2011. Next to cryptocurrency exchange, it offers an NFT marketplace and an OTC desk.

Kraken scores above average on response quality and time, but is not one of the top scorers.

For clients in the European Economic Area, except Italy, Kraken uses a corporate entity in the British Virgin Islands (BVI). While officially an MLAT to the BVI is needed, Kraken does mostly accept national court orders or requests from a local prosecutor by email. Some mentioned an MLAT was still needed as a follow-up. Information can also be obtained via the BVI FIU. When queried about the BVI registration by EC3 staff, Kraken staff mentioned they are working on getting more registrations in Europe.

Some problems were reported due to Kraken requiring prosecutor requests, while in some countries police leads the pre-trial investigation. While information by Kraken is quite complete, it is shared in many files, which can complicate analysis.

Kraken has regularly attended Europol meetings and events for years.

Kriptomat

Contact: legal@kriptomat.io

URL: <https://kriptomat.io/>

Country: Estonia

Number of Responses: 5

Quality Rating: 4.00 (very useful: 1 useful: 4)

Kriptomat is a company offering buying, selling and storing of cryptocurrency. It is based in Estonia.

Kriptomat is considered a cooperative and positive company to deal with by the law enforcement agencies respondents that mentioned them in this survey.

It is a founding member of the International Association for Trusted Blockchain Applications (INATBA) and it actively warns its customers against falling victim to fraud through the Kriptomat Internal Fraud Prevention Program.

KuCoin

Contact: rbenquiries@kucoin.com

URL: <https://www.kucoin.com/>

Country: Seychelles

Number of Responses: 33

Quality Rating: 2.50 (very useful: 3 useful: 12 limited info: 9 no response: 9)

KuCoin was launched in 2017. KuCoin offers cryptocurrency exchange, P2P trading, cryptocurrency derivatives trading, cryptocurrency lending, an NFT platform, and institutional (OTC) trading.

KuCoin has the second worst rating when it comes to response time. Also, on response quality, they have a bad score.

Many LEAs have never received a response from KuCoin. In some cases, IP and transactional data has been received, but no KYC data. Some LEAs used to receive information from KuCoin, but not anymore. KuCoin has previously asked LEAs for additional information and documents to prove the identity of the requesting officer.

In some cases, information was obtained through the FIU of the Seychelles. In various cases, initial responses are provided, but then no answers are received for months in relation to, for example, preservation or freezing requests.

Kuna

Contact: law@kuna.family or SIENA request to Ukrainian liaison bureau

URL: <https://kuna.io/en>

Country: Lithuania, Canada, Ukraine

Number of Responses: 5

Quality Rating: 2.25 (useful: 3 no response: 2)

Kuna is an exchange founded in Ukraine. Kuna also issues stablecoin UAX, which is pegged 1:1 to the Ukrainian fiat currency Hryvnia.

Kuna is in the bottom top 10 for both response quality and response time.

Whereas Kuna advertises itself as a Ukrainian company, it is subject to supervision in Lithuania and Canada. Their anti-money laundering policy refers to two entities in Lithuania (UAB Kuna Pro) and Canada (FlexyPay Inc.).

Some LEAs reported success in obtaining information and assets freezes. However, other LEAs requests were disregarded by Kuna.

The Ukrainian liaison office at Europol has indicated that requests to Kuna can be sent through a SIENA message addressed to the Ukrainian Cyberpolice.

Kyrrex

Contact: support@kyrrex.com

URL: <https://kyrrex.com/>

Country: Saint Vincent & Grenadines, Malta

Number of Responses: 9

Quality Rating: 1.67 (useful: 1 limited info: 4 useless: 1 no response: 3)

Kyrrex is a cryptocurrency exchange and wallet service provider. Kyrrex exchanges provides exchange and wallet services to its customer KRRX Bot, which offers trading through Telegram. Kyrrex offers other services as well, such as an OTC platform, their own KRRX token, and various 'as-a-service' offerings, through their 'White Label Solution', where clients can create their own exchange, Telegram Bot or OTC desk.

Kyrrex is based in Saint Vincent and the Grenadines (Kyrrex Limited) and Malta (Real Exchange (REX) LTD).

Kyrrex is the second lowest scorer in the survey when it comes to response quality and is also in the bottom 10 when it comes to response time.

Part of this may be explained by the relation of Kyrrex to KRRX Bot. Kyrrex says it does not hold information about clients of the KRRX Bot. On occasion Kyrrex does provide Telegram ID of users and a possible destination address of funds. However, according to one respondent, the provided destination of funds was wrong, as the value and date did not match.

Localbitcoins (ceased operations)

Contact: Finnish law enforcement (through SIENA)

URL: <https://localbitcoins.com/>

Country: Finland

Number of Responses: 13

Quality Rating: 3.65 (very useful: 6 useful: 4 limited info: 1 no response: 2)

LocalBitcoins is a cryptocurrency exchange that has ceased operations. LocalBitcoins mainly gained notoriety for its facilitating of peer-to-peer transactions, where traders were offered the option to exchange cryptocurrency for cash. In 2019, this option was removed from LocalBitcoins.

LocalBitcoins scored above average on response quality and under average on response speed.

LocalBitcoins stopped operating in February 2023. Users have until February 2024 to withdraw funds from LocalBitcoins. LocalBitcoins will only respond to requests coming from Finnish law enforcement. Requests can be sent to the Finnish National Bureau of Investigation (NBI), through a SIENA message to Finland. Funds can still be seized or transferred through the Finnish police. Requests should not be sent to LocalBitcoins directly.

Luno

Contact: legal@luno.com

URL: <https://www.luno.com/>

Country: United Kingdom, South Africa, Singapore

Number of Responses: 17

Quality Rating: 2.72 (very useful: 2 useful: 4 limited info: 8 useless: 1 no response: 2)

Luno was founded in 2013 under the name BITX and rebranded in 2016 to Luno. Luno offers the buying, selling, and exchange of cryptocurrency, and a wallet.

Luno scored below average on response quality and on response time.

There are different Luno legal entities in various countries. It is advised to first contact Luno through the above email address to see what legal entity is the correct one in your case. An MLAT is needed. Request without MLAT only seem possible if the victim in a case signs a letter of approval.

Responses from Luno have come in PDF format. In some cases, before receiving an MLAT Luno has assisted with investigations without disclosing customer information.

MEXC

Contact: legal@mexc.com; <https://www.mexc.com/support/requests/legal> (form);

URL: <https://www.mexc.com/>

Country: Seychelles (registration), Singapore, China

Number of Responses: 16

Quality Rating: 2.97 (very useful: 2 useful: 8 limited info: 3 no response: 3)

MEXC is an exchange that also offers other services, such as a P2P trading, crypto derivatives, and a crypto debit and credit card.

It seems that MEXC is registered in the Seychelles, but much of its staff is in Singapore and China. MEXC uses an online request portal to deal with law enforcement requests, but can also be reached through above email address.

MEXC scores below average on response quality and speed.

MEXC also handles exchange services for Safepal. MEXC will inform you when this is the case.

MEXC is considered difficult to deal with by law enforcement agencies. It is slow in responding to requests and, in some cases, it has not responded at all.

MoonPay

Contact: <https://app.kodex.us/moonpay/signin> (government request portal);

compliance@moonpay.io

URL: <https://www.moonpay.com/en-gb>

Country: United States

Number of Responses: 12

Quality Rating: 3.13 (very useful: 1 useful: 8 limited info: 1 no response: 2)

MoonPay is a company that enables payment in cryptocurrency on apps and websites. They offer a cryptocurrency onramp, which enables companies to implement a payment gateway to convert fiat money to cryptocurrency. MoonPay also offers the buying, selling, and swapping of cryptocurrency.

MoonPay scores below average on response quality. On response speed they nearly get an average score.

MoonPay uses the Kodex platform to deal with law enforcement requests.

N.exchange

Contact: legal@n.exchange (cc support@n.exchange)

URL: <https://n.exchange/>

Country: Marshall Islands

Number of Responses: 6

Quality Rating: 3.33 (very useful: 2 useful: 2 limited info: 1 no response: 1)

N.exchange is a company offering instant exchange of cryptocurrency. It works with Exodus wallet, Swapspace, Swapzone, amongst others

N.exchange has an average response quality score. It scores below average on speed.

There is no clear indication where N.exchange is based: online support phone numbers are from the United Kingdom and Denmark. On N.Exchange's LinkedIn page there is an address in Ajeltake on the Marshall Islands in the 'Trust Company Complex'.

N.exchange asks for signed official requests to be sent to them by email, before they will provide information.

Nexo

Contact: compliance@nexo.io

URL: <https://nexo.com/>

Country: United Kingdom, Bulgaria

Number of Responses: 5

Quality Rating: 4.00 (very useful: 1 useful: 4)

Nexo is a company that is not only focused on exchanging, but also on earning interest on cryptocurrency. For offering a cryptocurrency lending products, Nexo received a USD 45 million fine from the Securities and Exchange Commission. The company has now left the United States. Nexo also has been prosecuted for money laundering in Bulgaria, where many of its (senior) staff are based.

Nexo scored above average in response quality and below average in response time.

Nexo requires an official request with a signature or stamp addressed to Nexo Capital Inc., which they can receive by email.

OKCoin

Contact: lawenforcement_OKCoinEuropeLTD@okcoin.com (European LEAs);
lawenforcement_OKCoinUSA@okcoin.com (US LEAs);
lawenforcement_OKCointechLTD@okcoin.com (other LEAs)

URL: <https://www.okcoin.com/>

Country: United States (also offices in Malta, Hong Kong, Singapore, Japan)

Number of Responses: 5

Quality Rating: 1.75 (useful: 2 useless: 1 no response: 2)

OKCoin is a large cryptocurrency exchange that offers trading between several cryptocurrencies and fiat currencies. The company is originally Chinese, but now has offices all over the world.

OKCoin was founded in 2013 and falls under OK Group, which also owns OKX. OKCoin will be rebranded and continue under the name OKX from late 2023 / early 2024.

This may turn out a positive development for law enforcement, as OKCoin is one of the worst performing companies in this survey, both on response quality and time.

OKX (formerly OKEX)

Contact: le_okexseychelles@okx.com

URL: <https://www.okx.com/>

Country: Seychelles

Number of Responses: 34

Quality Rating: 4.01 (very useful: 14 useful: 11 limited info: 4 useless: 1 no response: 1)

OKX, formerly known as OKEX, is one of the larger cryptocurrency exchanges when it comes to transaction volume. OKX also offers crypto derivatives and margin trading, P2P trading, institutional (OTC) trading, and more. OKX also issues OKB token.

OKX was at first located in China, but is now officially based in the Seychelles.

OKX has shown a great improvement in its responsiveness to law enforcement agencies. In 2020, the company (OKEX) was the worst scorer in the survey, but now it scores above

average on both response quality and time. Especially on response time it is scoring well, as it is the 6th best scoring company in that regard.

Before the fall of 2022 OKX was unhelpful, but since their approach has changed and the quality of their responses has improved. Since summer 2023, their response time has also become quicker. OKX now provides KYC, IP data, transaction lists, and more. According to one respondent, there are still some accounts on OKX without KYC.

Some countries used the email address le_okexseychelles@okx.com whereas other used enforcement@okx.com.

In some cases, MLATs were requested. In others, data was provided by email within a day.

Paxful

Contact: subpoenas@paxful.com;

<https://paxful.atlassian.net/servicedesk/customer/portal/9/group/36> (LE portal)

URL: <https://paxful.com/>

Country: United States

Number of Responses: 20

Quality Rating: 3.63 (very useful: 7 useful: 8 limited info: 3 no response: 2)

Paxful is a peer-to-peer platform, mainly focused on Bitcoin, USDT and USDC. It allows for the buying and selling of these cryptocurrencies through over 350 payment methods. Some examples include PayPal, Revolut, and Wise, but also through cash deposits to bank accounts or prepaid debit cards.

Paxful scores slightly above average on response quality, but just below average on response time.

Paxful generally requests a court order or even an MLAT before they provide information. One respondent mentioned they obtained information through police-to-police channels. For US agencies, a subpoena or warrant to the above email address is sufficient.

Paybis

Contact: support@paybis.com

URL: <https://paybis.com/>

Country: Poland, United States

Number of Responses: 8

Quality Rating: 3.28 (very useful: 2 useful: 3 limited info: 2 no response: 1)

Paybis is a cryptocurrency exchange. Paybis also offers a wallet and a fiat on-ramp and off-ramp to other companies.

Paybis scores slightly below average on both response quality and speed.

However, some countries received a response within 3 to 5 days.

Poloniex

Contact: compliance@poloniex.com

URL: <https://poloniex.com/>

Country: Seychelles

Number of Responses: 17

Quality Rating: 3.60 (very useful: 7 useful: 5 limited info: 3 no response: 2)

Poloniex is a cryptocurrency exchange that also offers a crypto rewards program, P2P trading, margin and futures trading with cryptocurrencies. On its website, it links to APENFT, an NFT marketplace.

Poloniex scores above average on response quality and speed. In the last survey it did not have a good score, so Poloniex improved.

Several respondents mentioned that initial information can be obtained through the FIU Seychelles. Most respondents see the company as cooperative, while a few respondents did not receive replies to their emails.

The official registered company name is Polo Digital Assets, LTD.

Remitano

Contact: legal@remitano.com

URL: <https://remitano.com/home/eu>

Country: Seychelles

Number of Responses: 10

Quality Rating: 3.63 (very useful: 2 useful: 5 limited info: 3)

Remitano is a cryptocurrency exchange founded in 2014 that also enables the P2P sale of cryptocurrency for fiat currencies, and the purchase of Bitcoin, Ethereum, USDT, Bitcoin

Cash, Litecoin, Ripple, Binance Coin and EURR in a wide variety of gift cards. Remitano was founded by company Babylon Solutions Limited and is registered in the Seychelles

Remitano received an above average score on response quality and a good score on response speed. In the 2020 survey, Remitano did not have a good score, so it appears they have improved.

Some LEAs received an answer within the same day, whereas others still indicated that the flow of information provided was 'unreliable'.

Revolut

Contact: courtorders@revolut.com; complex.investigations.unit@revolut.com (for emergencies, put courtorders@revolut.com in cc);

URL: <https://www.revolut.com/crypto/>

Country: Lithuania (EEA users); United Kingdom (UK and Switzerland users)

Number of Responses: 13

Quality Rating: 4.71 (very useful: 10 useful: 3)

Revolut is an online bank and financial technology company, headquartered in the United Kingdom. Revolut also offers a cryptocurrency wallet and enables selling and buying of cryptocurrency in certain countries.

Revolut is one of the top performers in this survey. They are the second-best scorer when it comes to response quality and the third best when it comes to response speed.

In many cases, an MLAT is needed, but Revolut can sometimes provide information for emergency request before receiving the MLAT. In other cases, a court order led to data provided within one day. One LEA mentioned that Revolut provided better information due to Europol's SIRIUS template³.

Simpleswap

Contact: security@simpleswap.io

URL: <https://simpleswap.io/>

Country: Marshall Islands

Number of Responses: 7

³ <https://epe.europol.europa.eu/group/sirius/templates> (for access: EPE@europol.europa.eu)

Quality Rating: 4.11 (very useful: 3 useful: 3 limited info: 1)

Simpleswap is a swapping service and cryptocurrency exchange.

Simpleswap is the fastest responding company in this survey and also scores well on response quality.

For cryptocurrency swaps, customers leave no KYC data behind, so the company will mainly be able to provide transactional, traffic and device information of customers.

Stake

Contact: compliance@stake.com

URL: <https://stake.bet/> or <https://stake.com/>

Country: Curaçao

Number of Responses: 5

Quality Rating: 3.75 (very useful: 1 useful: 3 limited info: 1)

Stake.bet (or Stake.com) is a website to bet with cryptocurrencies on sports games, horse racing, and make 'casino style' bets. Stake.bet also offers the purchase of cryptocurrency through Mastercard, Apple Pay, Google Pay etc. Stake is registered on the island of Curaçao as 'Medium Rare N.V.'.

Stake.bet scores above average on quality and slightly above average on response time.

Switchain

Contact: compliance@switchain.com

URL: <https://www.switchain.com/>

Country: Marshall Islands

Number of Responses: 9

Quality Rating: 2.92 (useful: 5 limited info: 3 no response: 1)

Switchain provides an API to allow businesses to offer cryptocurrency swapping on their platforms.

Switchain scores below average on quality and around average on response time.

Switchain can provide information on incoming and outgoing cryptocurrency addresses, applications where the trade took place, and IP addresses. An example of a service using Switchain is Exodus wallet.

Tether

Contact: inforequests@tether.to

URL: <https://tether.to/en/>

Country: British Virgin Islands

Number of Responses: 8

Quality Rating: 3.59 (very useful: 2 useful: 3 limited info: 3)

Tether is a company that is mainly known for issuing stablecoin USDT, which is available on blockchains such as Tron and Ethereum. Tether also issues a Euro stablecoin (EURT), a Mexican Pesos stablecoin (MXN), the offshore Chinese Yuan (CNH), and XAUt – a digital token backed by gold.

Tether scores above average on response quality and speed.

The smart contracts of the stablecoins issued by Tether have a blacklisting functionality, meaning that these tokens can be frozen even when they are not in an exchange account or in a wallet in law enforcement's possession. This is the same for some other stablecoin issuers, such as Circle (USDC).

Tether may freeze stablecoins when requested to do so by email. In a presentation at a European Commission event in October 2023, Tether explained that they first validate law enforcement requests, then do their own investigation to verify the investigator's findings, and eventually freeze funds. However, the freezing can only happen with a multisignature transaction, meaning that several members of staff have to sign the transaction.

Uphold

Contact: financial.crime@uphold.com

URL: <https://uphold.com/>

Country: Lithuania

Number of Responses: 7

Quality Rating: 3.75 (very useful: 1 useful: 5 limited info: 1)

Uphold is a cryptocurrency company where users can buy and sell over 250 cryptocurrencies. Uphold also runs Topper, which is a payment widget that allows cryptocurrency companies to accept more currencies.

Uphold scores above average on quality and response time.

In 2018, the Luxembourg Commission de Surveillance du Secteur Financier (CSSF) issued a warning that Uphold was not based in their country, even though Uphold said so. As of November 2023, Uphold states on their website to be only based in Lithuania.

WazirX

Contact: legal@wazirx.com

URL: <https://wazirx.com/>

Country: India

Number of Responses: 7

Quality Rating: 3.21 (very useful: 3 useful: 2 no response: 2)

WazirX is an exchange based in India. WazirX also offers a P2P market.

WazirX scores below average on response quality and time.

To some agencies WazirX responds to letterhead requests sent to the above email address. Others did not receive any response.

Whitebit

Contact: legal@whitebit.com

URL: <https://whitebit.com/>

Country: Lithuania

Number of Responses: 23

Quality Rating: 3.53 (very useful: 5 useful: 13 limited info: 3 no response: 2)

Whitebit is a cryptocurrency exchange that offers numerous products, such as Whitebit coin (WBT), futures and margin trading, cryptocurrency lending and borrowing, gift cards, OTC trading, and a debit 'WB card'. Whitebit was founded in Ukraine in 2018, but is officially registered in Lithuania.

Whitebit scores above average on response quality, but below average on response time.

Whitebit requires an official signed and stamped law enforcement request, sent to them by email.

Whitebit can provide KYC, transactional, and IP traffic data. In some cases, Whitebit's infrastructure might be used by other companies through their API, in which case they request that company the information and provide it to law enforcement. Whitebit also

offers a swapping service ('Convert'), but the company can provide the receiving address and email address of a person or service making a swap.

Wirex

Contact: policerequests@wirexapp.com (if no response, ask Europol for additional email address of staff member)

URL: <https://wirexapp.com/>

Country: United Kingdom (registration), Croatia (post box)

Number of Responses: 15

Quality Rating: 4.25 (very useful: 8 useful: 6 useless: 1)

Wirex is a cryptocurrency exchange founded in 2014. Wirex Card is a debit card offered to customers to spend cryptocurrency. Wirex also offers Wirex Credit Line where customers can borrow funds and use bitcoins or ether as collateral.

Wirex is the fifth best scoring company on response quality in this survey. On response speed they score above average.

According to Croatian law enforcement colleagues, Wirex has an 'empty' office in Zagreb (Wirex Digital). The main Wirex company is based in London (Wirex Digital LLC).

Wirex will accept all request through email, such as signed requests, subpoenas, EIOs or MLATs. Wirex prefers to receive editable documents, so they can copy identifiers (addresses, transaction hashes, emails etc.). The company specifically requested that one colleague is put in CC for every request. Please contact EC3 for these contact details.

Zebpay

Contact: compliance@zebpay.com

URL: <https://zebpay.com/>

Country: Singapore

Number of Responses: 5

Quality Rating: 4.25 (very useful: 2 useful: 3)

Zebpay is a cryptocurrency exchange that was founded in 2014. Zebpay offers OTC trade, cryptocurrency lending, and more.

Zebpay is in the top 10 for best response quality. On response speed they also score above average.

Zebpay has previously asked for a statement to be included in a request if an investigator does not want the owner of the account to be notified. Investigators should make sure to include such a statement, as forgetting this can be detrimental to a case.

zondacrypto (formerly Zonda and BitBay)

Contact: bip@zondaglobal.com or through Polish Cybercrime Unit – cyber-kgp@policja.gov.pl or through SIENA to Polish JCAT

URL: <https://zondacrypto.com/>

Country: Poland

Number of Responses: 5

Quality Rating: 4.25 (very useful: 2 useful: 3)

zondacrypto is a Polish exchange and the new name of Bitbay. In November 2021 Bitbay changed their name to Zonda. In 2023 they changed their name again, to zondacrypto. Confusingly, Bitbay.market is another cryptocurrency platform that is still active, but this is different from zondacrypto and advertising itself as a decentralised currency and marketplace.

Experiences with zondacrypto are quite positive, the company is in the top 10 for this survey on response quality. However, for response speed they score slightly below average.

Information can be requested in various ways: directly from zondacrypto, through the Polish Cybercrime Unit or through the Polish JCAT officer, who can be reached through SIENA.



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