

MEMORANDUM

To: Crypto Task Force Meeting Log
From: Crypto Task Force Staff
Re: Meeting with Representatives of TRM Labs

On March 31, 2025, Crypto Task Force Staff met with representatives from TRM Labs.

The topic discussed was approaches to addressing issues related to regulation of crypto assets. TRM Labs representatives provided the attached document, which was discussed during the meeting.

Executive Summary

TRM Labs requests a meeting with the SEC Crypto Task Force to provide insight on how TRM's blockchain intelligence solution enhances the SEC's ability to detect and mitigate fraud in cryptocurrency markets. By leveraging TRM's blockchain analytics, investigators can identify fraudulent schemes, track illicit financial flows, and strengthen market oversight.

Our proposed meeting topics would include:

- Fraud Detection & Investigation – Utilizing blockchain data to uncover insider trading, market manipulation, and Ponzi schemes.
- Market Oversight – Enhancing SEC monitoring through blockchain analytics to detect illicit trading patterns, such as wash trading and pump-and-dump schemes.
- Tracing Illicit Financial Flows & Asset Recovery – Applying forensic blockchain analysis to track fraudulent transactions, identify bad actors, and support asset recovery.
- Supporting SEC Investigations – Integrating blockchain intelligence into enforcement efforts to improve efficiency and collaboration.

The discussion will focus on practical applications, real-world case studies, and strategies to incorporate blockchain intelligence into SEC operations. By leveraging blockchain's transparency and data-driven insights, the SEC can enhance its ability to combat crypto-related fraud, protect investors, and uphold market integrity.

TRM Labs Attendees:

Ari Redbord - Global Head of Policy

John Schreder - Account Director, US Regulators

Thomas Armstrong - Head of Compliance Advisory

Proposed Agenda: Leveraging Blockchain Intelligence to Support SEC Crypto Task Force Mission with TRM Labs

1. Introduction: Enhancing Fraud Detection with Blockchain Intelligence

- Overview of how TRM Labs' blockchain intelligence platform supports the SEC's mission to detect and mitigate fraud in crypto markets.
- Understanding blockchain's role in financial markets and the transparency it provides for investigations.

2. Investigating Fraud in Crypto Markets Using Blockchain Data

- How TRM Labs can assist in identifying fraudulent schemes, including insider trading, market manipulation, and Ponzi schemes.
- Case studies demonstrating the use of blockchain analysis in securities fraud investigations.
- Detecting fraudulent token issuances, wash trading, and illicit coordination on decentralized and centralized platforms.

3. Strengthening Market Oversight Through Blockchain Analytics

- How blockchain data can enhance SEC monitoring of market abuses and illicit financial activity.
- Identifying transaction patterns indicative of fraudulent behavior, such as pump-and-dump schemes and front-running.
- Enhancing enforcement efforts by tracing the movement of assets across wallets, exchanges, and payment networks.

4. Tracing Illicit Financial Flows and Recovering Assets

- Using blockchain intelligence to track fraudulent transactions and establish connections between bad actors.
- Supporting asset recovery efforts through on-chain tracing techniques.
- Enhancing investigative capabilities by integrating blockchain analysis with traditional financial oversight tools.

5. Supporting SEC Investigations with Actionable Intelligence

- How blockchain analysis can streamline investigative processes, improve efficiency, and support enforcement actions.
- Practical approaches to incorporating blockchain intelligence into SEC investigations and compliance efforts.
- Strengthening collaboration between regulators and investigative teams to maximize the impact of enforcement actions.

6. Discussion and Next Steps

- Opportunities for continued engagement and collaboration.
- Identifying ways to further integrate TRM into SEC operations - how can TRM further support SEC's mission?
- Addressing key challenges in crypto fraud detection and enforcement.