Report of FSA's Joint Research on Analyzing Decentralized Financial System using On-Chain and Off-Chain Data

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- In a decentralized financial system, many issues have been pointed out from the viewpoints of user protection, financial crime prevention, and financial stability, etc. In order to reap the fruits of technological innovation, it is essential to reduce these risks. In considering how to respond to various risks, risk assessment using objective and reliable data is considered important. However, as the FSB, FATF, and other organizations have pointed out in their reports, there is a lack of data necessary to understand the actual state of decentralized financial systems, including DeFi and P2P.
- Therefore, as part of the FSA's "International Joint Research on Blockchain" this research will conduct a survey on the actual status of distributed financial systems, including DeFi and P2P, using on-chain/off-chain data. In distributed financial systems, in addition to on-chain data such as transaction records on the blockchain, more in-depth data can be obtained by linking off-chain data such as IP addresses, web traffic, and sanctions-related information with blockchain addresses. We will conduct this research in order to understand the actual situation of such on-chain/off-chain data, including whether or not the data can be obtained, and to provide a useful perspective for considering future policy measures.
- * Note that the addresses and transactions that can be analyzed with the blockchain analytics tools, etc. used in this research are only a small portion of the total, and not necessarily the data of the entire decentralized financial system. (See below for details).

Acknowledgements

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- However, any errors in the content regarding this report are attributed to the trustee, Qunie Corporation.

Disclaimer

- The contents of this report do not represent the official views of the JFSA.
- The contents in this report other than historical or current facts are forward-looking statements based on information available at the time of writing, and actual trends may vary due to a variety of uncertainties.

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Data Analysis Methods Utilized in the Research Literature

* Some of the terms in this report do not necessarily have fixed definitions, and there are also differences in definitions among blockchain analytics tool companies. Note that these terms are specified based on the definitions of the blockchain analytics tools employed in this report.

Terminology	Definition	
AML/CFT	Anti Money Laundering and Combating the Financing of Terrorism	
DeFi	Decentralized Finance: Financial services provided through the use of smart contracts	
DEX	Decentralized Exchange (a type of DeFi)	
EOA	Externally Owned Account: Accounts on the Ethereum blockchain that are managed with a private key and can send and receive native tokens and other tokens and deploy and execute smart contracts	
FATF	Financial Action Task Force on Money Laundering	
FSB	Financial Stability Board	
КҮС	Know Your Customer: Customer Identification Program	
P2P	Peer to Peer (Transaction): Transactions using unhosted wallets (for the purposes of this report, transactions between unhosted wallets)	
TVL	Total Value Locked: Total crypto assets deposited with DeFi (locked in smart contracts)	
VASP	Virtual Asset Service Provider: Providers of crypto asset exchanges, custodial (i.e. hosted) wallets, etc.	

Terminology	Definition	
On-chain data	• Data that can be obtained on the blockchain (addresses, transaction history, balances, and other smart contract status)	
Off-chain data	 Data other than on-chain data *In this report, layer 2 of the Ethereum blockchain (e.g., Arbitrum) is considered off-chain data. 	
BC Explorer	For the purposes of this report, this refers to blockchain data analysis sites that are publicly available on websites (Etherscan, Dune Analytics, etc.)	
Crypto asset- related databases	 For the purposes of this report, refers to crypto asset market information sites published on websites (CoinGecko, CoinMarketCap, etc.) 	
Blockchain analytics tools	 Analytics tools provided by blockchain analytics companies On-chain data can be queried and searched, information such as category and account names for some addresses identified by blockchain analytics companies, and transactions for high-risk addresses. 	
High Risk address	 For the purposes of this report, certain blockchain analytics companies calculate risk values on a scale of 100, based on the following information, with a score of 80 or higher being a "high-risk address" Addresses used for fraud and hacking Addresses posted on public sanctions lists Information from other blockchain analysis company Research information inside the blockchain company Information from Open Source Intel (OSINT) 	
High Risk Transaction	Transactions where the senders or recipients of the transaction, or both, are high-risk addresses	
Smart Contract	• A program that is written to the blockchain and defines rules that are automatically executed when a function is invoked through a transaction	

Glossary

Terminology	Definition	
Token Contract	 Smart contracts that manage the amount of tokens (USDC/USDT, etc.) issued, owners, balances, etc. that comply with ERC-20 standards, etc. Owner, balance, etc. are updated as tokens are transferred*1 	
Oracle Contracts	 Smart contracts that feed data to obtain off-chain external data Used primarily as a price oracle to obtain external market prices and interest rates*2 	
Contract Account	 Account for deployed smart contracts Smart contracts are executed in response to messages received from EOA and other contract accounts*3 	
Transaction	 Digitized and signed actions initiated by EOA In Ethereum, transfer tokens, deploy smart contracts, or invoke smart contract functions*4 	
Block	 Data containing the hash (cryptographic digest) and transaction of one previous block in the blockchain Blocks are generated by a randomly selected validator on the Ethereum blockchain*5 	
Bridge	 Also called a cross-chain bridge, a generic term for functions and services that provide a way to interconnect different blockchains and transmit tokens and other items. When the tokens to be sent between different blockchains are different, the tokens of the source blockchain are generally locked (frozen) in the bridge and exchanged for the tokens of the destination blockchain*6. 	
Hosted Wallet	 Wallet provided by VASP and others Users entrust the management of their private keys to VASPs, etc. (wallet administrators), and VASPs can intervene and execute transfer transactions, etc. of users' cryptographic assets. 	
Unhosted Wallet	• Wallets in which users directly manage their private keys without going through a VASP, etc. Users can generally execute cryptographic asset transfer transactions, etc. directly.	

*1: Ethereum.org ERC-20 TOKEN STANDARD <u>https://ethereum.org/en/developers/docs/standards/tokens/erc-20/</u>
*2: Ethereum.org ORACLES <u>https://ethereum.org/en/developers/docs/oracles/</u>
*3: Ethereum.org ETHEREUM ACCOUNTS <u>https://ethereum.org/en/developers/docs/accounts/</u>
*4: Ethereum.org TRANSACTIONS <u>https://ethereum.org/en/developers/docs/transactions/</u>

- *5: Ethereum.org BLOCKS <u>https://ethereum.org/en/developers/docs/blocks/</u> *6: Ethereum.org BRIDGES <u>https://ethereum.org/en/developers/docs/bridges/</u>

Chapter 1: The Need for Data Analysis in Distributed Financial Systems

Chapter 1: The Need for Data Analysis in Decentralized Financial Systems

- In this chapter, we will organize the types of data needed to understand the actual state of decentralized financial systems from the perspective of financial authorities and the possibility of obtaining such data. In particular, the FSB report and the FATF report on data gaps will be used as a starting point.
- This chapter is organized as follows
 - Section 1-1, Explain the factors contributing to the data gaps identified in the FSB report and examples of available/unavailable data and additional data to be obtained.
 - Section 1-2, Explain the results of the investigation of P2P transactions by blockchain analytics companies as pointed out in the FATF report, and examples of red flags indicators in the identification of AML/CFT crypto asset related data.

- (1) FSB report issues
 - In a report (published in February 2023) pointing out the financial stability risks of DeFi and other issues, the report points out the problem of lack of transparency and consistency of data in the crypto asset market, including DeFi. (see table below)
 - In the future, they will work with Standard Setting Bodies (SSBs) and regulators to consider approaches to fill data gaps to measure and monitor DeFi interconnections.

Data gaps factor	Details
Difficulty in aggregating and analyzing the vast amount of data available on a distributed ledger	 While data from public blockchains is transparent and immutable in some respects, it is generally difficult to collect and analyze due to its sheer volume.
Information on the public ledger is anonymous	 While transaction data at the wallet level is accessible, the lack of data on the identity of the wallet owner makes vulnerability assessment very difficult. Various privacy-enhancing technologies (wallet mixers/tumblers/anonymity-enhancing crypto assets, etc.) exist that can obscure the transparency of transactions by certain users.
A lot of off-chain data	 The large amount of off-chain data in the crypto asset market, including DeFi, makes it difficult to get a picture of overall market activity from on-chain data alone.
No obligation to report consistent data in accordance with regulations	 A portion of the crypto asset ecosystem is currently outside of, or not in compliance with, the regulatory framework and is therefore not obligated to produce and report consistent and reliable data, or is not in compliance with its obligations.
Possibility of data manipulation by data providers	 Some data providers may be incentivized to manipulate data to make their respective platforms appear more important and attract additional transaction volume or investment. Market incentives for trading and lending platforms, coupled with participants who deviate from or act without compliance with the existing regulatory framework, increase the risk of market manipulation and data falsification.

Table 1-1-1 Data Gap Factors in the FSB Report

Source: FSB, The Financial Stability Risks of Decentralized Finance, February 2023, https://www.fsb.org/2023/02/the-financial-stability-risks-of- decentralised-finance/

- (2) FSB report issues (example data)
 - Examples of available/unavailable data to be obtained, as noted by the FSB, are as follows
 - Based on these points, this research identifies the data sets that are desirable to obtain, and verifies the availability and reliability of each data set using blockchain analytics tools.

Transmission Channels	Available Metrics	Data Gaps
Wealth Effects	 Market capitalization of crypto-assets Trading volumes Realized volatility and gamma Geographical adoption 	 Share of households invested in crypto-assets Share of assets relative to household wealth Demographic skew among household's holdings Owners of unbacked crypto-assets
Confidence Effects	 Share of retail ownership of crypto-assets Number of clients in infrastructures that provide access to crypto-assets (e.g. trading platforms, wallet providers) 	Volume of crypto-asset fraud
Financial Sector Exposure	 Share of institutional ownership of crypto-assets Share of assets invested in crypto-assets Number of large financial service providers offering crypto-asset services Volume of crypto-asset derivatives market Open interest of crypto-asset derivative contracts Correlations of crypto-assets with other asset classes Share of transaction volume by transaction size 	 AUM and share of holdings of funds that offer exposure to crypto-assets (by asset type e.g. spot, derivative, eco-system and investor type) Bank sector exposure (absolute vs hedged; change in open interest) Reporting by financial institutions on crypto-assets held and serviced
Use in Payments and Settlements	 Prices and delta (over one week, 1m, 3m, 6m, 1y) Trading volumes (absolute vs. average) Number of large payment service providers supporting crypto-assets Market share of major crypto-asset exchanges 	 Number and value of transactions Jurisdiction of the payers and payees Type of transactions (e.g. remittances, ecommerce, trading) Types of crypto-assets employed Acceptance as legal tender

Table 1-1-2-1 Data Gaps for Unbacked crypto-assets

(2) FSB report issues (example data)

Transmission Channels	Available Metrics	Data Gaps	Data to be added (as noted by experts)
Wealth Effects	 Market capitalization of stablecoins Trading volumes Realized volatility 	Owners of stablecoins	 Business relationship between VASP and issuers of stablecoins
Confidence Effects	 Share of retail ownership of stablecoins Number of clients in infrastructures that provide access to stablecoins (e.g. trading platforms, wallet providers) 	Volume of crypto-asset fraud	Addresses to be frozenTotal amount subject to be frozen
Financial Sector Exposure	 Share of institutional ownership of stablecoins Share of assets invested in stablecoins Number of large financial service providers offering stablecoin services Size of stablecoin market relative to US prime money market funds 	 Amounts and share of holdings of ETFs that offer exposure to stablecoins (by investor type) Profit and loss exposures Reserve assets invested in regulated markets Liquidity of reserve assets Granular and robust data on composition of stablecoins reserve assets Reporting by financial institutions on crypto-assets held and serviced 	 Actual crypto asset transactions by institutional investors and financial institutions (e.g., types of crypto assets/stablecoins preferred by large users)
Use in Payments and Settlements	 Prices Trading volumes Number of large payment service providers supporting stablecoins 	 Number and value of transactions Jurisdiction of the payers and payees Type of transactions (e.g. remittances, e-commerce, trading) Usage in crypto-asset trading platforms, by stablecoin Breakdown of uses of stablecoins 	_

(2) FSB report issues (example data)

Table 1-1-2-3 Data issues for DeFi (1/2)

Transmission Channels	Available Metrics	Data Gaps	Data to be added (as noted by experts)
Wealth Effects	 Total value locked-in, gross, adjusted and net; realized volatility Transaction volume of DeFi's Exchange (DEX) Wallet growth Market capitalization and transaction volume of governance tokens; Transaction volume in DeFi lending Lending rate in DeFi Lending Utilization rate of liquidity pool of DeFi Lending and Exchange DeFi yield and return 	 Share of retail vs institutional participation Number of dApps on a blockchain Liquidity pools, DeFi stablecoins, derivatives (entities within the DeFi space, including types of financial institutions (specialized or traditional financial institutions) to understand linkages of DeFi with the rest of the financial system) Metrics to measure leverage Information on the governance tokens holders could be obtained from to see to what extent the governance is decentralized (e.g. if the ownership of governance tokens is concentrated, that entity could be considered the actual developer) 	 TVL (TVL-based market share of major DeFi protocols) Market Capitalization of Stablecoin Degree of linkage between major DeFi (DEX-Lending, etc.) Total tokens locked in the cross-chain bridge Cross Chain Bridge's business relationship with VASP Oracle's market share in TVL and other measures Collateral ratios, leverage ratios, and actual rehypothecation according to collateral type for lending protocols Major remittance address from Treasury Protocol
Confidence Effec	• Number of clients in infrastructures that provide access to DeFi (e.g. trading platforms, wallet providers)	 Volume of crypto-asset fraud Share of transactions in unbacked crypto- assets vs. stablecoins 	 Governance Token Concentration DeFi Protocol Concentration Total amount and number of DeFi-related hacking losses

(2) FSB report issues (example data)

Transmission Channels	Available Metrics	Data Gaps	Data to be added (as noted by experts)
Financial Sector Exposure	 Share of institutional ownership of crypto- assets Share of assets invested in crypto-assets Number of large financial service providers offering crypto-asset services Volume of crypto-asset derivatives market Open interest of derivative contracts Correlations of crypto-assets with other asset classes Share of transaction volume by transaction size 	 Amounts and share of holdings of ETFs that offer exposure to crypto-assets by investor type 	 Amount invested in traditional financial assets utilizing tokens locked to smart contracts as collateral
Use in Payments and Settlements	 Price of key players (DOT, UNI, LINK) and delta over one week, one month, three months, six months, one year and 7-day average volume; 	 Number and value of transactions Breakdown of counterparties Jurisdiction of the payers and payees Type of transactions (e.g. remittances, ecommerce, trading) 	_

1-2. Data Gap Issues Identified in FATF Reports

(1) FATF report issues (P2P transactions)

100%

90%

80%

70%

60%

50%

40%

30%

20%

10%

0%

2016

18%

2017

2018

Number of transactions

- The July 2021 FATF report reported that the findings of several blockchain analytics company on the actual status of P2P transactions (e.g., the percentage of total P2P transactions) showed a wide variation in results.
- Regarding the percentage of bitcoin transactions that occurred without VASP between 2016 and 2020, four companies analyzed 40% to 70% in terms of number of transactions, while two companies analyzed 10%~32%. In addition, for the value of transactions (in US dollars), a large variation exists in the company's analysis, ranging from 2% to 91% (Graph 2).
- A variation of 0.3% to 12.7% in terms of number of transactions and 0% to 15.4% in terms of transaction value (USD) exists for the percentage of fraudulent bitcoin transactions identified between 2016 and 2020 (Graph 3).

Fig. 1-2-1 Example of FATF report's findings on P2P transactions and illicit transactions

Graph 2: Proportion of bitcoin transactions which occur without a VASP between 2016-2020 (left: number of transactions;12 right: USD value13)

55%-

2019

2020

83%

58%

539

49

2016

50

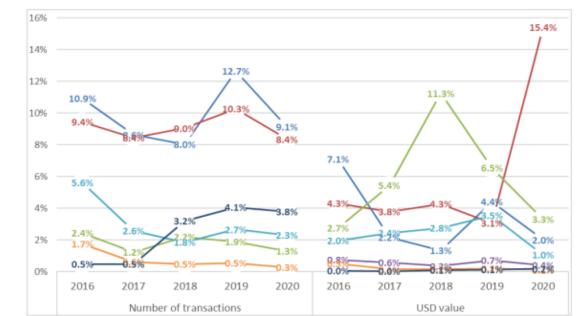
2017

24%

2018

USD value

2019



Graph 3: Proportion of identified illicit bitcoin transactions between 2016-2020 (left: number of transactions¹⁵; right: USD value¹⁶)

Source: FATF, Second 12-Month Review of the Revised FATF Standards on Virtual Assets/VASPs, July 2021 https://www.fatf-gafi.org/en/publications/ Fatfrecommendations/Second-12-month-review-virtual-assets-vasps.html

2020

1-2. Data Gap Issues Identified in FATF Reports

(2) FATF report issues (AML/CFT related)

- The September 2020 FATF report noted that not only can money launderers, terrorist financiers, and other criminals obtain, move, and store assets digitally outside of the regulated financial system, but also that it is difficult for reporting entities to identify suspicious activity in a timely manner, obfuscating the source and destination of funds The report also points out that it is difficult for reporting entities to identify suspicious activity in a timely manner.
- In light of the above points, we have published a report on ML/TF red flags related to crypto assets to assist reporting entities, including VASPs, in identifying and reporting potential ML and TF activities related to crypto assets.

Red flag Indicators	Use Case Examples	
Size and frequency of transactions	 Structuring VA transactions (e.g. exchange or transfer) in small amounts, or in amounts under record-keeping or reporting thresholds, similar to structuring cash transactions. Making multiple high-value transactions in short succession, such as within a 24-hour period, etc. 	
Transaction Patterns	 A new user attempts to trade the entire balance of VAs, or withdraws the VAs and attempts to send the entire balance off the platform. Making frequent transfers in a certain period of time (e.g. a day, a week, a month, etc.) to the same VA account, etc. 	
Anonymity	 VAs transferred to or from wallets that show previous patterns of activity associated with the use of VASPs that operate mixing or tumbling services or P2P platforms. Funds deposited or withdrawn from a VA address or wallet with direct and indirect exposure links to known suspicious sources, including darknet marketplaces, mixing/tumbling services, questionable gambling sites, illegal activities (e.g. ransomware) and/or theft reports, etc. 	
Senders or Recipients	 A customer's VA address appears on public forums associated with illegal activity. A customer is known via publicly available information to law enforcement due to previous criminal association, etc. 	
Source of Funds or Wealth	 Transacting with VA addresses that are connected to known fraud, extortion, or ransomware schemes, sanctioned addresses, darknet marketplaces, or other illicit websites. VA transactions originating from or destined to online gambling services, etc. 	
Geographical Risks	 Customer's funds originate from, or are sent to, an exchange that is not registered in the jurisdiction where either the customer or exchange is located. Customer sends funds to VASPs operating in jurisdictions that have no VA regulation, or have not implemented AML/CFT controls. 	

Table 1-2-2 Red Flag Indicators

Source: FATF, Virtual Assets Red Flag Indicators of Money Laundering and Terrorist Financing, September 2020 https://www.fatf-gafi.org/en/ publications/Methodsandtrends/Virtual-assets-red-flag-indicators.html

Chapter 2: On-Chain/Off-Chain Data Mapping

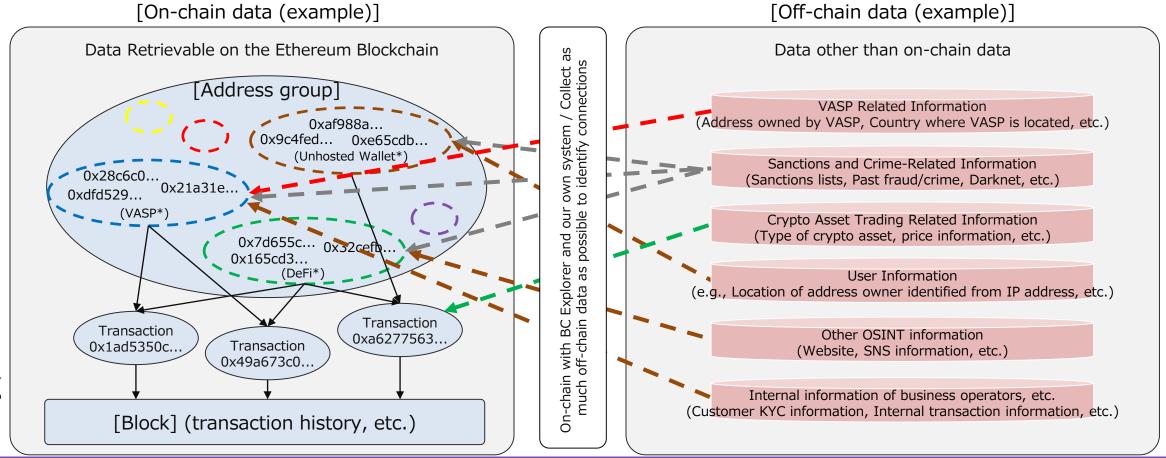
Chapter 2: On-Chain/Off-Chain Data Mapping

- In order to analyze data in a decentralized financial system, there is a limit to using only a random list of numbers and letters, such as wallet addresses and transaction IDs, which can be obtained on-chain. It is necessary to link these onchain data with data outside the blockchain, such as wallet owners (off-chain data), to understand the actual status of transaction relationships, etc. Therefore, this chapter attempts to provide an overview of on-chain/off-chain data, organize its components, and map both types of data.
- Specifically, we organized the elements and connections between on-chain data and other off-chain data that can be obtained on the Ethereum blockchain. Based on this, we mapped the overall picture of on-chain/off-chain data.
- This chapter is organized as follows
 - Section 2-1, Describes the components of on-chain/off-chain data.
 - Section 2-2, Describes the mapping of on-chain/off-chain data.

(1) On-chain/off-chain data connections

- Blockchain analytics company typically utilize open source and proprietary tools and know-how to collect both on-chain and off-chain data, group related addresses, label addresses (e.g., assigning a VASP's account name to a set of addresses managed by a particular VASP), and calculate address risk scores.), and calculate risk scores for addresses.
- Below is an image showing some of the various data that blockchain analytics tool companies are collecting and the connections between them.





(2) Elements of off-chain data

- Possible elements of off-chain data tied to on-chain data include the following. (On-chain data is defined in the glossary, so the explanation is omitted.)
 - * This page does not discuss the availability of each piece of data, and the table is a sampling of the major on-chain data that are generally believed to exist.
- The relationship between the respective off-chain and on-chain data is shown in the mapping diagram in the next section.

Table 2-1-2 Major Components of Off-Chain Data (1/2)

Classification	Data Element	Data Contents
Off-chain data	Token Transaction Price	Transaction prices of various crypto assets, etc. offered by VASPs, etc.
	Hosted Wallet	 Users' IP addresses, KYC information (name, address, date of birth, credit card information, etc.), transaction history, wallet private keys, web traffic data, etc.
	Unhosted Wallet	 User information for wallets such as Metamask, including the user's IP address, wallet private key, and web traffic data
	DeFi User Interface	User information such as IP addresses of users via interfaces, web traffic data, etc. as user information for DeFi, etc.
	Transaction information outside the blockchain	 Information on transactions outside the blockchain, such as transfers of crypto assets between customers by rebooking within the VASP, etc.
	Governance Voter Information	 Information related to governance voting in DeFi, DAO, etc., including the identity of the voter (e.g., user name on Discord, etc.)
	Infrastructure service user information such as nodes and APIs	• Information on infrastructure service users who use Ethereum nodes and Ethereum blockchain API services, including users' IP addresses, KYC information (name, address, date of birth, credit card information, etc.), and number of API calls
	Github source code, parameters, etc.	• Source code, parameters, etc. of smart contracts posted on Github (a software development platform for storing and publishing programs, etc.), etc.
	Information on assets backing stablecoin issuances	 Name of the financial institution that manages the bank deposits, government bonds, and other assets backing stablecoin issuances, as well as the type and amount of assets.

(2) Elements of off-chain data

Table 2-1-2 Major Components of Off-Chain Data (2/2)

Classification	Data Element				
	Validator Information	• Validator information, such as IP address of the validator node, secret key, etc.			
	Staking Information	 Validator staking information, such as the investor and amount of money that will be used for staking services 			
Off-chain data	Layer 2 Transaction Information	 Transaction information executed at Layer 2, such as the user's address, sending address, amount transferred, etc. (Layer 2 is defined as off-chain data in this research) 			
	Bridge node information	• Information on the node operated by the bridge administrator, such as IP address and secret ke			
	Token information locked on the bridge	 Information about the tokens locked on the bridge, including the type and amount of tokens locked 			

(3) Connection points for on-chain/off-chain data

- Nodal points such as wallets and interfaces generally exist between on-chain and off-chain data. The table shows the major connection points.
- The relationship between each connection point and on-chain/off-chain data is shown in the mapping diagram below.

Connection point		Description (specific examples of connections)		
External Oracle		 Oracle provider provides crypto asset prices, etc. provided by VASP to protocols in the blockchain (DeFi, etc.) 		
Wallet	Hosted Wallet	• VASP (hosted wallet provider) manages customer information and private keys, and customers instruct the VASP to transfer tokens from the wallet.		
Wallet	Unhosted Wallet	 Using a wallet provided by software companies (wallet provider), the user directly manages the private key to transfer tokens, etc. 		
User Interface		 DeFi and others operate user interfaces such as websites and smartphone applications, and users use the services directly. 		
	Smart contract developer node	 Smart contract developer deploys smart contract on blockchain based on source code on GitHub (may also be deployed from wallet) 		
	Stablecoin Operator Node	Stablecoin operator issues and burns stablecoins with administrative authority.		
Node	Validator Nodes	 Validators participate in the blockchain consensus by depositing participation fees and registering clients to generate and approve blocks 		
	Layer 2 operator node	 Layer 2 operator executes transactions on the Layer 2 blockchain and forwards the results to the Layer 1 main chain 		
	Bridge administrator node	 Bridge administrators send and verify tokens and other information that users exchange with each other between different blockchains. 		

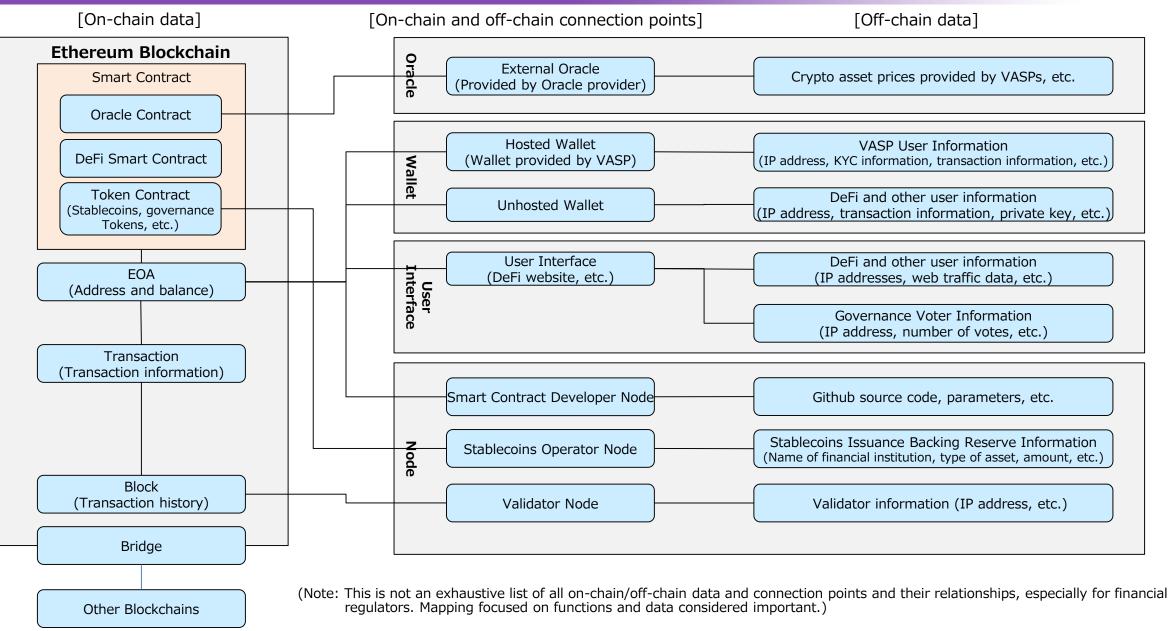
Table 2-1-3 On-chain/off-chain connection points

(1) On-chain/off-chain data mapping

- We extracted and mapped the main components of the on-chain/off-chain data of the Ethereum blockchain and visualized the following three points.
 - > Main components and overall classification of on-chain data, connection points, and off-chain data
 - > Connection between on-chain data, connection points, and off-chain data
 - > Manager of the off-chain data (organization or person who manages the off-chain data) *only in the detailed version

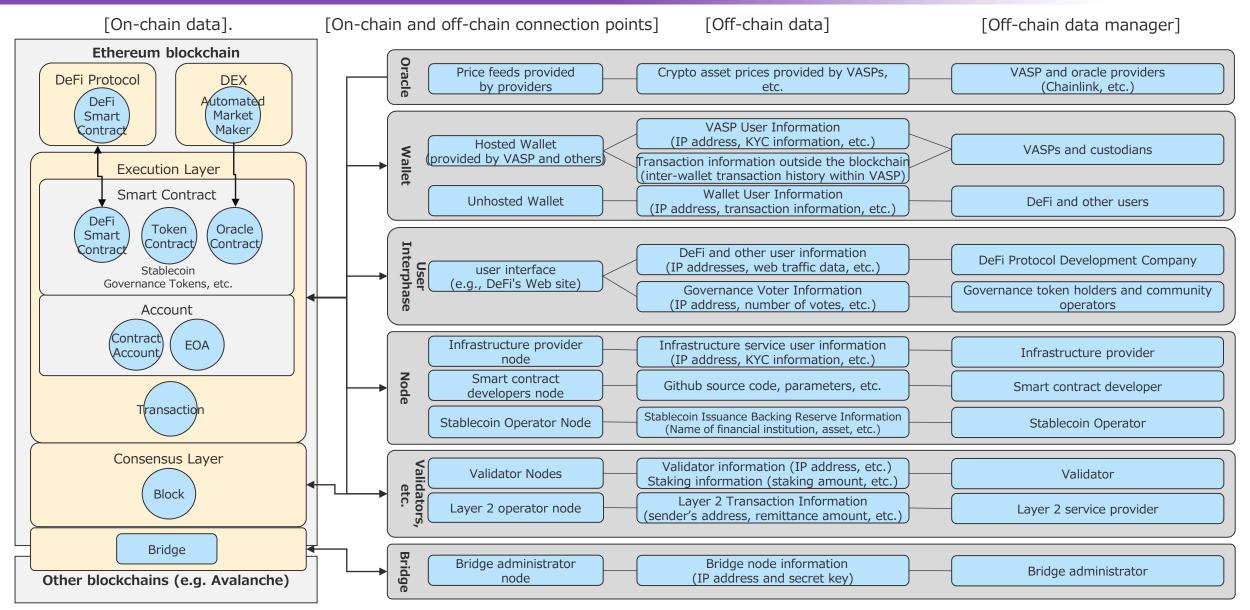
2-2. On-chain/Off-chain Data Mapping

Figure 2-2-1 On-chain/off-chain data mapping (overview version)



2-2. On-chain/Off-chain Data Mapping

Figure 2-2-2 On-chain/off-chain data mapping (detailed version)



Chapter 3: Survey and Examination of Data Necessary to Understand the Actual State of Decentralized Financial Systems

Chapter 3: Survey and Examination of Data Necessary to Understand the Actual State of Decentralized Financial Systems

- Based on the organization of on-chain/off-chain data and connection points up to the previous chapter, this chapter
 details the data sources considered useful as sources of these data, the range of data sources utilized in the data analysis
 of this research, and the data survey methodology.
- This chapter is organized as follows
 - Section 3-1, Summarize the various data sources that are considered useful for understanding the actual state of decentralized financial systems, and then indicate the range of data sources actually utilized in this research.
 - Section 3-2, Provide an overview of the survey methodology used in the data analysis.
 - > Section 3-3, Provide an overview of the blockchain analytics tools that were heavily used in this data analysis.

3-1. Various Data Sources and Scope of This Research

of this Research

Scope

and

Sources

Various Data

Table 3-1

- As shown in the table, various data sources exist, but in addition to on-chain/off-chain differences, data reliability, availability, and accessibility (i.e., free of charge) vary widely. While understanding the characteristics of each type of data, it is necessary to analyze data according to regulatory objectives.
- In this research, we will utilize "BC (blockchain) Explorer," "cryptographic asset-related databases," and "blockchain analytics tool company (analytics tool researchers)," which may be able to obtain data of a different nature from the data available due to supervisory actions, etc., to conduct data analysis, etc.

	Data Source	Businesses, etc. (Inside Information)	Businesses, etc. (Disclosure Information)	BC Explorer	Crypto Asset-Related Database	Blockchain Analysis Tool Company	
	Summary	Data obtained from reporting requests	Information legally disclosed by listed companies, etc.	Blockchain account and transaction-related data	Crypto asset prices and other data	Data obtained from blockchain analytics tools/researchers	(0)
	Public / Private	Private	Public	Public	Public		Sco
	On-chain/Off-chain	Off-chain	Off-chain	On-chain	(Many are) Off-chain	Combination of on-chain and off-chain	ope
	Data Reliability	High	High	High	Medium (Many informations are on VASPs declaration basis)	Medium to low?	of
	VASP	Ο	Ο	△ (Certain information is available regarding major VASPs)	\bigcirc to \triangle (Some VASPs are difficult to obtain)	of the blockchain analytics	this re
המומ שטעו	(Unregistered) VASP	×	×	riangle to $ imes$	\bigcirc to \triangle (Some VASPs are difficult to obtain)		esearc
	DeFi	\bigtriangleup to x (May be obtained for DeFi regulated as VASP)	× (Some DeFi may voluntarily disclose information)	\bigtriangleup (Data on contract addresses, etc. can be obtained)	△ (Data on DEX, etc. can be obtained)	 O to △ (Depends on the capability of the blockchain analytics tool company) 	н Н
ומחוב ח	Unhosted Wallet (including P2P)	△ (VASP-Unhosted Wallet- related data may be available)	×	riangle to x (Some unhosted wallets may be obtained)	×	△ (Depends on the capability of the blockchain analytics tool company, but is it accurate or not)	

*Note that blockchain analytics tools vary in functionality and characteristics, and the range of data that can be obtained and the level of confidence in the data varies.

(1) Outline

• The data available from each of the data sources and the methodology of this research are as follows

Data Source		Data that can be obtained	Survey Methodology for this research
BC (Blockchain) explorer		 Data such as blockchain addresses and transactions available from public Web sites Data such as category name (VASP, DeFi, etc.)/account name assigned to the address that identified the target 	 Investigate data that can be obtained by referring to public Web sites Main survey targets Etherscan Dune Analytics, etc.
Crypto asset-related databases		 Data on crypto asset prices, market price charts, market capitalization, and number of recent transactions available from public Web sites Transaction data, latest news, etc. on specific crypto assets, crypto asset traders, etc. 	 Investigate data that can be obtained by referring to public Web sites Main survey targets CoinGecko Coinmarketcap
Blockchain analytics	Blockchain Analytics tools	 Data that can be obtained from analytics tools provided by blockchain analytics company (address holder category/account name, risk score based on sanctions and past criminal history, etc.) 	 Investigate data that can be obtained from multiple blockchain analytics company tools (Avoid risk of relying on data from one company)
company	Research by Experts	 Data from research conducted by experts from blockchain analytics company (e.g. data on complex conditions combining on-chain data with in-house databases, etc.) 	 Outsource research to specific blockchain analytics company to obtain necessary data

Table 3-2-1 Data Sources and Survey Methods Utilized in this Research

3-2. Survey Method

(2) Candidate data for analysis

- As noted in the table, the data considered to be obtainable differed by each method. On the other hand, based on the fact that much of the information that can be obtained from (1) BC Explorer is also incorporated into (3) and (4), etc., data analysis was conducted primarily using (2), (3) and (4).
- By contracting with multiple companies, the blockchain analytics tool attempted to reduce the risk of relying on data from one company (whose reliability is difficult for us to verify).

Table 3-2-2 Examples of data that can be obtained

		(1) BC Explorer	(2) Crypto-asset related database	(3) Blockchain analytics tools	(4) Research by experts
Main Features		 Websites that allow users to search and query data in the blockchain Some major VASPs and DeFi can get the address from the account name 	 Web site offering real-time market prices for crypto assets 	 Analytical tools provided by blockchain companies Provides risk indication of specific entities, addresses, and alert detection of high-risk address transactions for investigative authorities, etc. 	 In-depth research conducted by experts from blockchain analytics company using information from their own analytics tools and databases
Data Availability	On-chain data	 Block information (block number, number of transactions, etc.) Account information (address, balance by token, etc.) Transaction information (transaction time, number, etc.) *Data can be obtained for each account/transaction (overall statistics cannot be obtained) 	 Major DeFi TVL Token Issuance Volume Trading information on major decentralized exchanges (last 24 hours trading volume, number of token pairs/trade volume by pair, etc.) 	 Account information (address, balance by token, etc.) Transaction information (last 24-hour trading volume, first/last trade date, trade date, number of trades, volume, etc.) Diagram display of account counterparties, etc. 	 Aggregation of transactions based on complex search criteria (small transactions, multiple transfers to the same party in a short period of time, fraudulent address users, etc.) Anonymous service address Token freeze address, transaction volume, etc.
	Off-chain data	 Account names for some addresses (e.g. some VASPs and DeFi that publish addresses) 	 List of token prices per VASP Token Price Trend Chart (From the 1st to the whole period) Chart of market capitalization of tokens Latest Crypto Asset News Overview of major tokens (founder, characteristics, etc.) 	 Category name and account name of the identified address Risk value of an address Risk values are self-determined by the blockchain analytics company Account Information (country licenses held, level of KYC enforcement, etc.) 	 Aggregation of transactions by category and account Aggregate VASP information Number of hacking victims and amount of damage Aggregation of fraudulent addresses (sanctioned lists, fraud extortion, darknet, etc.) Number of VASP users, etc.

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3-3. Overview of Blockchain analytics tools

- Blockchain analytics tools are generally paid software provided by private companies that combine on-chain and off-chain data to identify category and account names and determine the risk score of the corresponding addresses using clustering techniques, etc. Blockchain analytics tools are mainly used by VASPs, institutional investors, investigative authorities, etc. for the purpose of detecting transactions with high-risk addresses and identifying account names of addresses under investigation (e.g., theft of cryptographic assets).
- The following table summarizes the data and other information provided by the analytics tools used in this study (note that the information obtained, its accuracy, and its scope vary depending on the tool).

Item	Data and services	Specifics	Remarks
	Entity Information	 VASP: Holding address, account name, name of the country where the legal entity is located, current operating status, description of services, date of establishment, CEO name, brief description, contact information, e-mail address, country where the office is located, etc. DeFi/Wallet: address, account name, balance by token, last 24 hours trading volume, total sent/received, first/last active date, etc. 	 Category names, account names, etc. labeled in the address can be obtained.
	Entity Transaction Information	 Transaction volume by VASP token, daily profit/loss amount, asset value, balance and transaction amount by address managed by VASP, transaction history, etc. 	Only VASPs are eligible.
	Entity Risk Information	Countries of license registration, AML/KYC implementation status, etc.	• Only VASPs are eligible.
Display and search blockchain data	Address risk level/risk score	 Risk level: 4 levels: Severe, High, Medium, and Low (severe: Risk score 80-100, High: risk score 50-79, etc.) Risk score: Risk value calculated on a scale of 100 *Information on risk determination: addresses used for fraud or crime in the past, addresses subject to sanctions, etc. 	 Risk level classification and risk score values vary by analytics tools
	Description of high-risk transactions related to the address	 Reasons for determining that the transaction is high risk (threats, malware, mixing, darknet, phishing, ransomware, etc.) Graphical display of number of transactions, amount (USD, ETH, etc.), and number of transactions Transaction history (transaction date and time, transaction hash number, sender's address, recipient's address, amount, etc.) The above can be displayed by blockchain, time period, etc. 	
	Listing of high-risk addresses	Display addresses in order of risk score (link to view screen for each address)	

Table 3-3 Overview of Blockchain analytics tools (1/2)

3-3. Overview of Blockchain analytics tools

(data) item	Data and services provided	Specifics	Remarks
Display and search blockchain data	Transaction Graph	 Visualize the connection of transactions by drawing the transaction history by received/sent, category name/account name of sent/received address, token, and amount on one screen. Transactions associated with high-risk addresses are distinguished in red For a given address, automatically draw multiple transactions before and after in relation to each other 	 Clicking on the appropriate icon (address) will display the sending/receiving transaction recipient, token name, amount, etc., centered on that address.
	Entity Related News	Net news related to entities, etc. (excerpts of articles from various news sites)	
Trace Function	Automatic Transaction Tracing	 Automatically draws a series of multiple transactions executed for a specified address over a specified period of time 	• When executed by specifying an address and period, the transaction status within the target period is continuously displayed.
Alert Detection	Automatic detection of designated address transactions	 Automatic detection and alert notification of transactions at specified addresses, including high-risk addresses 	• By specifying the address in advance, the system automatically detects when a transaction occurs.
Sanctions List	View the list of sanctions for each country	 Display information (names of targets, details of sanctions, etc.) published in sanctions lists of U.S. OFAC, UK, EU, etc. 	
Other	Record blockchain addresses	• A function that records a search address once and eliminates the need to enter the address the next time the search is performed.	

Chapter 4: Data Analysis Results

Chapter 4: Data Analysis Results

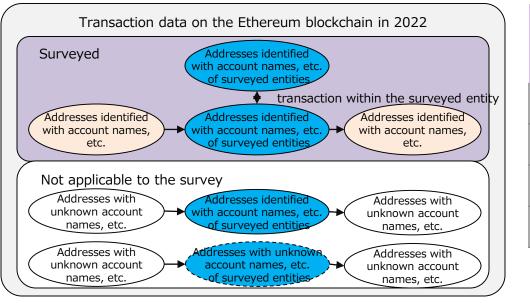
- In this chapter, we present the results of actual analysis of the data pointed out in the previous chapters, obtained as much as possible by using analytical tools and researchers.
- This chapter is organized as follows
 - Section 4-1, Discuss the scope of the data analysis conducted and the limitations of the data analysis (in that there are many addresses and transactions that are difficult to analyze).
 - Section 4-2, Report the results of a quantitative comparison with other company's tools to examine the reliability of the data obtained from the researcher.
 - Section 4-3, Present the results of our data analysis focusing on the data availability and financial stability aspects of VASPs, lending platform, stablecoins, and DeFi, also taking into account the points raised in the FSB report.
 - Section 4-4, Present the distribution of VASPs, lending platform, unhosted wallets (including P2P), AML/CFT-related data availability, and high-risk transactions and the results of our analysis, taking into account the findings of the FATF report.

4-1. Scope and Limitations of Data Analysis

The scope of this research is limited to transaction data from addresses identified by the blockchain analytics company used in this study, including account names. As a result, the results of the data analysis are localized and limited to these data (the data of the entire decentralized financial system was not analyzed).

Item	Description	Supplement
Scope of data research	 Among the transaction data on the Ethereum blockchain in 2022, the blockchain analysis company have identified some addresses by category name (VASP, DeFi, etc.) or account name (VASP name, etc.), which were used as survey targets. The transaction data sent and received from these addresses were aggregated. 	 The number of transactions identified by category or account name is 4-33% of the total and is not indicative of the total If the category names or other classifications identified by the blockchain analytics company are incorrect, the data will also be inaccurate.

Figure 4-1-1 Scope of transaction data survey



Number of transactions Ratio to the Surveyed total number of (1) Identified (2) Unknown Entity Ethereum $(1) + (2)^*$ account name, account name, transactions* etc. etc. 3,381,239 22,397,649 VASP-A 25,778,888 6.3% (87%) (13%)1,293,983 34,175,484 VASP-B 35,469,467 8.7% (4%) (96%) 144,457 297,820 Lending Platform 442,277 0.1% (33%) (67%) 5,772,973 26,097,100 31,870,073 Unhosted Wallet 7.8% (18%) (82%)

*"(1)+(2)" is the number of transactions identified address holders, even if it is an unhosted wallet transaction. *The number of transactions for the entire Ethereum in 2022: approx. 409 million.

Table 4-1-1-2 Number of transactions for entities surveyed

4-2. Reliability Evaluation of Obtained Data

(1) Comparison of research results and other company's tools: A certain level of confidence in the number and value of VASP-related transactions

- There is a marked difference in the number of addresses held by the two companies, approximately 20~2,200 times. This may be due to the two companies different information collection resources and labeling methods.
- Since the difference between the two companies in terms of the number of transactions and transaction value is about 50-150%, which is not a large difference, a certain degree of reliability can be seen in the data.

 \rightarrow The above results suggest, for example, that (2) may contain surveyed entity-related addresses that are currently rarely used.

Table 4-2-1 Comparison of survey results and other company's tool

*Using token price rates as of April 2023.

Item	Classification		(1) Company A Research Results	(2) Company B Tool Information	(2) ÷ (1)	Remarks
	Addresses		21,834	8,066,565	36945.0%	Significant difference (369x)
	Tabal Transform	Incoming	9,310,372	14,369,476	154.3%	
VASP-A	Total Transfers	Outgoing	14,269,851	12,135,550	85.0%	
	Tatal Valuma (Mt)	Incoming	314,321	344,649	109.6%	
	Total Volume (M\$)	Outgoing	311,188	340,245	109.3%	
	Addresses		14,220	31,755,943	223318.9%	Significant difference (2,233x)
	Total Transfers	Incoming	15,717,777	7,425,815	47.2%	
VASP-B		Outgoing	18,752,632	13,616,799	72.6%	
	Total Volume (M\$)	Incoming	250,914	265,435	105.8%	
		Outgoing	252,892	255,632	101.1%	
	Addresses		15,730	306,442	1948.1%	Significant difference (19 x)
Law Barn	Tabal Turneform	Incoming	109,391	127,706	116.7%	
Lending Platform	Total Transfers	Outgoing	205,940	202,160	98.2%	
	Total Volume (M\$)	Incoming	13,785	16,092	116.7%	
		Outgoing	11,725	16,288	138.9%	

4-2. Reliability Evaluation of Obtained Data

(2) Comparison of research results with other company's tools: Reliability of data varies depending on trading partners.

- Since there is no significant difference in the number of transactions between the two VASPs and other VASPs, a certain degree of reliability can be seen in the data.
- The number of transactions/addresses between VASP and DeFi differs by a factor of about 3 between the two companies. This is thought to be due to differences in the way DeFi determines high-risk addresses between the blockchain analytics companies.

			Treesing (Total high-ı	risk transfers (high-risk ac	ldresses)*	
Item	Classification	Counterparty	Incoming / Outgoing	(1) Company A Research Results	(2) Company B Tool Information	(2) ÷ (1)	Remarks
	Addresses	-	-	85 address	-	-	
		In VASP-A	-	2,184,570 (29 addresses)	2,184,443 (17 addresses)	99.9% (58.6%)	Difference (Number of addresses 2x)
		VASP-B	VASP-A Incoming	88,988 (18 addresses)	88,983 (16 addresses)	100.0 (88.9%)	
	Total Transfers	VASP-B	VASP-A Outgoing	59,102 (18 addresses)	59,102 (18 addresses)	100.0% (100.0%)	
		Other VASPs tal Transfers	VASP-A Incoming	173,577 (115 addresses)	172,891 (99 addresses)	99.6% (86.1%)	
VASP-A			VASP-A Outgoing	133,483 (398 addresses)	116,634 (136 addresses)	87.4% (34.2%)	Difference (Number of addresses 3x)
		DeFi	VASP-A Incoming	30,158 (262 addresses)	9,954 (132 addresses)	33.0% (38.8%)	Difference (Trx. 3x, Addr. 3x)
		Den	VASP-A Outgoing	3,465 (37 addresses)	3,383 (21 addresses)	96.4% (82.3%)	
		Unhosted Wallet	VASP-A Incoming	11,565 (55 addresses)	10,561 (32 addresses)	91.3% (58.2%)	Difference (Number of addresses 2x)
		onnosteu wallet	VASP-A Outgoing	25,622 (131 addresses)	19,561 (58 addresses)	76.3% (44.3%)	Difference (Number of addresses 2x)

Table 4-2-2 Comparison of High-risk transactions survey results and other company's tool

*The number of addresses is the total of both sending and receiving addresses; (2) is the number of high-risk transactions and addresses in (1) that are high-risk using the tools of blockchain analytics company B.

4-2. Reliability Evaluation of Obtained Data

(3) Comparison of research results with other company's tools: Reliability of data varies depending on trading partners.

There is a marked difference in the number of high-risk transactions/addresses for unhosted wallets between the two analytics companies. This
suggests that there are significant differences in the identification rate of unhosted wallets and the method used to determine high-risk addresses
among the analytics companies.

			Turner (Total high	-risk transfers (high-risk ad	ldresses)*	
Item	Classification	Counterparty	Incoming / Outgoing	(1) Company A Research Results	(2) Company B Tool Information	(2) ÷ (1)	Remarks
	Addresses	-	-	8 addresses	-	-	
	Total Transfers	In VASP-B	-	694,838 (8 addresses)	694,838 (8 addresses)	100.0% (100.0%)	
		VASP-A		(Same as t	he number of transactions in VAS	SP-A / VASP-B)	
		Other VASPs	VASP-B Incoming	45,792 (56 addresses)	45,744 (55 addresses)	100.0% (98.2%)	
VASP-B			VASP-B Outgoing	51,716 (211 addresses)	47,144 (57 addresseses)	91.2% (27.0%)	Difference (Number of addresses 4x)
		Total Transfers DeFi	VASP-B Incoming	4,039 (102 addresses)	2,464 (60 addresses)	61.0% (58.8%)	Difference (Trx. 2x, Addr. 2x)
			VASP-B Outgoing	361 (14 addresses)	356 (10 addresses)	98.6% (71.4%)	
		unhosted	VASP-B Incoming	3,467 (31 addresses)	3,264 (21 addresses)	94.1% (67.7%)	Difference (Number of addresses 1.5x)
Unhosted Wallet		wallet	VASP-B Outgoing	22,259 (105 addresses)	20,157 (39 addresses)	90.6% (37.1%)	Difference (Number of addresses 3x)
	Addresses	-	-	291 addresses	-	-	
	Total Transfers	P2P transactions	-	425,882 (291 addresses)	15,349 (55 addresses)	3.6% (18.9%)	Significant difference (Trx. 28x, Addr. 5x)

Table 4-2-3 Comparison of High-risk transactions survey results and other company's tool

*The number of addresses is the total of both sending and receiving addresses; (2) is the number of high-risk transactions and addresses in (1) that are high-risk using the tools of blockchain analytics company B.

4-2. Reliability Evaluation of Obtained Data

(4) Key Findings

Table 4-2-4 Key Findings

Кеу	r Findings	Contents	Supplement
n Analytics Tools	Only in a small percentage of cases can the counterparty be identified.	 Of all the transactions conducted with related addresses of the surveyed (VASPs, etc.), only a small portion of the transactions were able to identify the counterparties (i.e., categories of sending/receiving addresses, account names, etc.). Reasons may include difficulty in obtaining sufficient information to identify categories and accounts (e.g., addresses with only one transaction in the past), insufficient capacity of analytics tool companies (not enough off-chain data available to identify addresses, such as IP addresses, web traffic, and sanctions-related information), etc. 	 It is possible that more counterparties were identified by other company's analytics tools However, there is a
Limitations of Blockchain Analytics Tools	Data exist that show marked differences among analytics tool companies.	 While there are data categories where the differences between the two companies, such as the number and value of transactions between VASPs, are slight and can be given a certain degree of credibility, the results show marked differences between the analytics tool companies, such as the number of addresses held by VASPs and DeFi/unhosted wallet-related transactions. The reason for the relatively high confidence in VASP-related transactions may be that VASPs, where transactions above a certain size are concentrated, may be easier to identify than unhosted wallet-related transactions (including P2P), where transactions are held by individuals and are considered sporadic. Other differences in labeling methods (heuristic-based: based on empirical rules, etc. or proprietary algorithms, etc.) 	possibility that the identification is based on insufficient data, and it is difficult to judge the superiority of the analytic company based solely on the identification rate.

- With regard to the points raised in the FSB report, the results of an investigation into the possibility of data acquisition using various tools and
 expert research confirmed that some of the data made available in the report were difficult to obtain using the methods of this research, and that
 it was possible to obtain some of the data that was said to be unavailable (including data with limited obtaining).
- Note that the results of this survey are only localized based on the analytical tools used in this study and the results of expert research.

(1) Data	a availabili	ty for unba	acked crypto-assets	Table 1-3-1-1 Data avail	ability for unbacked crypt		 O: All data can be obtained △: Data generally obtainable, b ▲: Some data can be obtained ×: No data can be obtained at a 	, but only to a limited extent	
	Table 4-3-1-1 Data availability for unbacked crypto-assets (1/7) ×: Not i Transmis Data								
Classif ication	Transmis sion Channels	Data Classificat ion	Surveyed Data	BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks	
-assets			Market capitalization of crypto-assets	$\stackrel{ riangle}{ ext{Major crypto assets can}}$ be obtained	∆ Major crypto assets can be obtained	x Difficult to obtain data	$\stackrel{ riangle}{}$ Major crypto assets can be obtained	Targets are crypto assets whose market capitalization is disclosed by crypto asset-related databases, etc.	
Unbacked crypto-a	Wealth Effects	Available Metrics		Trading volumes	△ Can be obtained from the crypto asset issuer's transaction data on a per transaction basis. (aggregation is difficult).	× Difficult to obtain data	△ Can be obtained from the crypto asset issuer's transaction data on a per transaction basis. (aggregation is difficult).	O Can be obtained from the crypto asset issuer's transaction data	Targets are addresses identified by blockchain analytics companies as unbacked crypto-assets
nu			Realized volatility and gamma	× Difficult to obtain data	Price fluctuation data can be obtained and may be calculated from said data.	× Difficult to obtain data	- (Not included in this survey)		

(1) Data availability for unbacked crypto-assets

Table 4-3-1-1 Data availability for unbacked crypto-assets (2/7)

▲: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all

 \triangle : Data generally obtainable, but some difficult to obtain

					Decults of avai		-: Not included in this survey			
Classif	Transmis	Data			Results of ava	ilability of data		-		
ication	sion Channels	Classifica tion	Surveyed Data	BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks		
ets	Wealth Effects	Available Metrics	Geographical adoption	× Difficult to obtain data	× Difficult to obtain data	Data on the countries of registration of the main VASP licenses and available crypto assets can be obtained	- (Not included in this survey)	Some blockchain analytics companies that were not used in this research have published reports on regional penetration		
crypto-asse					Share of households invested in crypto assets	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)	
								Share of assets relative to household wealth	× Difficult to obtain data	× Difficult to obtain data
Unbacked		Data Gaps	Demographic skew among household's holdings	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)			
			Owners of unbacked crypto assets	Limited to some addresses such as identified by account name, etc.	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc.	Limited to some addresses such as identified by account name, etc.	Certain types of users are identified, such as major exchanges, prominent investors and sanctioned users.		

(1) Data availability for unbacked crypto-assets

Table 4-3-1-1 Data availability for unbacked crypto-assets (3/7)

▲: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all

 \triangle : Data generally obtainable, but some difficult to obtain

							-: Not included in this survey	
Classif	Transmis	Data			Results of ava	ilability of data		
ication	sion Channels	Classifica tion	a Surveyed Data	BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks
Unbacked crypto-assets	Confidenc e Effects	Available Metrics	Share of retail ownership of crypto assets	It is difficult to calculate the share because it is limited to a part of the address account names, etc. that are specified.	× Difficult to obtain data	× Difficult to obtain data	It is difficult to calculate the share because it is limited to a part of the address account names, etc. that are specified.	Targets are addresses identified as account names, etc. by blockchain analytics companies
				Number of clients in infrastructures that provide access to crypto assets (e.g. trading platforms, wallet providers)	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)
Unba		Data Gaps	Volume of crypto asset fraud	× Difficult to obtain data	× Difficult to obtain data	Some fraud cases have been identified, but it is difficult to calculate the total amount	Some fraud cases have been identified, but it is difficult to calculate the total amount	Targets are addresses identified as fraudulent transactions by blockchain analytics companies

(1) Data	a availabilit	ty for unba	cked crypto-assets	Table 4-3-1-1 Data availability for unbacked crypto-assets (4/7)			 O: All data can be obtained △: Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all 								
	Transmis	Data		Results of availability of data			-: Not included in this survey								
Classif ication	sion Channels	Classifica tion	Surveyed Data	BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks							
			Share of institutional ownership of crypto assets	Institutional holdings are limited to identified addresses, making it difficult to calculate overall share	× Difficult to obtain data	Institutional holdings are limited to identified addresses, making it difficult to calculate overall share	Institutional holdings are limited to identified addresses, making it difficult to calculate overall share								
			Share of assets invested in crypto assets	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)								
Unbacked crypto-assets		Financial		Available			al	-inancial	ial	Number of large financial service providers offering crypto asset services	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)	It is considered possible to ascertain a certain level of information through information on registered operators in each country.
ked cry	Sector Exposure	Available Metrics	Volume of crypto asset derivatives market	× Difficult to obtain data	\bigtriangleup Main crypto assets can be obtained.	× Difficult to obtain data	\bigtriangleup Main crypto assets can be obtained.								
Unbac			Open interest of crypto asset derivative contracts	× Difficult to obtain data	△ Main crypto assets can be obtained.	× Difficult to obtain data	$\stackrel{ riangle}{ riangle}$ Main crypto assets can be obtained.								
			Correlations of crypto assets with other asset classes	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in the survey)								
			Share of transaction volume by transaction size	Limited to some addresses such as identified by account name, etc., and difficult to ascertain the share of transactions.	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc., and difficult to ascertain the share of transactions.	Limited to some addresses such as identified by account name, etc., and difficult to ascertain the share of transactions.	Targets are addresses identified as financial institutions by blockchain analytics companies							

(1) Data availability for unbacked crypto-assets

Table 4-3-1-1 Data availability for unbacked crypto-assets (5/7)

 \triangle : Data generally obtainable, but some difficult to obtain **\bigstar**: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all

. Not included in this survey

Classif	Transmis	Data			Results of avai	ilability of data	·: Not included in this survey	Remarks
ication	sion Channels	Classifica tion	Surveyed Data	BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	
rypto-assets	Financial Sector	Data Gaps	AUM and share of holdings of funds that offer exposure to crypto assets (by asset type e.g. spot, derivative, eco system and investor type)	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)	
	Exposure		Bank sector exposure (absolute vs hedged; change in open interest)	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)	
Unb			Reporting by financial institutions on crypto assets held and serviced	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)	

(1) Data availability for unbacked crypto-assets

Table 4-3-1-1 Data availability for unbacked crypto-assets (6/7)

▲: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all

 \triangle : Data generally obtainable, but some difficult to obtain

							-: Not included in this survey		
Classif	Transmis	Data			Results of avai	lability of data			
Classif ication	sion Channels	Classifica tion	Surveyed Data	BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks	
Unbacked crypto-assets		Available	Prices and delta (over one week, 1m, 3m, 6m, 1y)	× Difficult to obtain data	$\stackrel{\bigtriangleup}{}_{\Delta}$ Main token prices and trends can be obtained.	× Difficult to obtain data	△ Major Token Prices and Transition Available		
	Use in		Trading volumes (absolute vs. average)	Limited to some addresses such as identified by account name, etc.	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc.	Limited to some addresses such as identified by account name, etc.	Targets are addresses identified as payment services by blockchain analytics companies	
	Payments and Settlemen ts				Number of large payment service providers supporting crypto assets	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)
			Market share of major crypto-asset exchanges	× Difficult to obtain data	O Possibility to calculate market share from trading volume by crypto asset pair for major VASPs	× Difficult to obtain data	O Possibility to calculate market share from trading volume by crypto asset pair for major VASPs	Crypto asset related databases to obtain the last 24 hours trading volume, etc.	

(1) Data availability for unbacked crypto-assets

Table 4-3-1-1 Data availability for unbacked crypto-assets (7/7)

▲: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all

 \triangle : Data generally obtainable, but some difficult to obtain

Transm							-: Not included in this survey		
Classif	Transmis sion	Data			Results of ava	ilability of data			
ication	sion Channels	Classifica tion	Surveyed Data	BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks	
			Number and value of transactions	Limited to some addresses such as identified by account name, etc.	× Difficult to obtain data	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc.	Targets are addresses identified as payment services by blockchain analytics companies	
crypto-assets	Use in Payments and	Data Gans	Data Gaps	Jurisdiction of the payers and payees	× Difficult to obtain data	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc. and jurisdiction (e.g., VASP)	Limited to some addresses such as identified by account name, etc. and jurisdiction (e.g., VASP)	Targets are addresses identified with account name and jurisdiction, etc. by blockchain analytics companies
Unbacked	Settlemen ts		Type of transactions (e.g. remittances, ecommerce, trading)	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)		
5			Types of crypto assets employed	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)		
			Acceptance as legal tender	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)		

(2)

Cla ica

2) Dat	a availabilit	ty for stabl	ecoins				 △: Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent 				
				Table 4-3-1-2 Data	a availability for stablecoir	ns (1/6)	 Some data can be obtained, but only to a innited extent No data can be obtained at all Not included in this survey 				
	Transmis	Data			Results of avai						
Classif Cation	sion Channels	Classifica tion	Surveyed Data	BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks			
10			Available Metrics		Metrics	Market capitalization of stablecoins	O (Assumption of equivalence to pegged legal tender)	$\stackrel{ riangle}{ riangle}$ Major stablecoins can be ontained	× Difficult to obtain data	O (Assumption of equivalence to pegged legal tender)	Targets are stablecoins whose market capitalization is disclosed by crypto asset-related databases, etc.
						Trading volumes	△ Can be obtained from stablecoin issuer transaction data on a per transaction basis (difficult to aggregate)	× Difficult to obtain data	△ Can be obtained from stablecoin issuer transaction data on a per transaction basis (difficult to aggregate)	O Can be obtained from stablecoin issuer transaction data	Targets are addresses identified as stablecoins by blockchain analytics companies
Stablecoins	Wealth Effects					Realized volatility	× Difficult to obtain data	Price fluctuation data can be obtained and may be calculated	× Difficult to obtain data	- (Not included in this survey)	
Ś		Data Gaps Data to be added	Owners of stablecoins	Limited to a portion of the address account name identified.	× Difficult to obtain data	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc.	Targets are to addresses identified as account names, etc. by blockchain analytics companies			
			Business relationship between VASP and issuers of stablecoins	△ Limited to VASPs identified on the BC Explorer and obtained on a per transaction basis (difficult to aggregate)	× Difficult to obtain data	△ Limited to VASPs identified by the analytics tool and can be obtained on a per transaction basis (difficult to aggregate)	△ A certain number can be obtained only for the VASPs identified by the analytics tool	Targets are addresses identified as VASP by blockchain analytics companies			

(2) Data availability for stablecoins \triangle : Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent Table 4-3-1-2 Data availability for stablecoins (2/6) ×: No data can be obtained at all -: Not included in this survey Results of availability of data Transmis Data Classif **Surveyed Data** sion Classifica Remarks **Crypto Asset** Blockchain **Research by** ication **BC Explorer** Channels tion **Related Database Analytics Tools Experts** Targets are addresses Limited to some Limited to some identified by blockchain Share of retail х Х addresses such as addresses such as ownership of stablecoins Difficult to obtain data Difficult to obtain data analytics companies as identified by account identified by account account names, etc. name, etc. name, etc. Available Number of clients in Metrics infrastructures that Platformers and wallet provide access to × X X (Not included in this providers may have it Difficult to obtain data stablecoins (e.g. trading Difficult to obtain data Difficult to obtain data survey) as internal data. platforms, wallet Stablecoins providers) \triangle \triangle Confidenc Can be obtained from Can be obtained from e Effects Ο Targets are addresses transaction data of transaction data of identified as fraudulent Can be obtained from Volume of crypto asset addresses with past addresses with past X Data Gaps transaction data of transactions by fraudulent transactions Difficult to obtain data fraudulent transactions fraud blockchain analytics addresses with past on a per transaction on a per transaction fraudulent transactions companies basis (difficult to basis (difficult to aggregate) aggregate) Aggregate addresses \triangle Can be obtained from Ο and volume of Addresses to be frozen / stablecoin issuer Can be obtained from transactions with Data to be х X total amount subject to Difficult to obtain data Difficult to obtain data added transaction data on a stablecoin issuer "Blocked" transaction be frozen per transaction basis transaction data results for stablecoin

(difficult to aggregate)

issuers

2) Dat	a availabilit	ty for stabl	ecoins				\triangle : Data generally obtainable, b	out some difficult to obtain	
				Table 4-3-1-2 Data	a availability for stablecoi		▲: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all -: Not included in this survey		
Classif	Transmis	Data Classifica tion			Results of avai				
ication	sion Channels		Surveyed Data	BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks	
Stablecoins	Financial Sector Exposure	Available Metrics	Share of institutional ownership of stablecoins	Institutional holdings are limited to identified addresses, making it difficult to calculate overall share	× Difficult to obtain data	Institutional holdings are limited to identified addresses, making it difficult to calculate overall share	Institutional holdings are limited to identified addresses, making it difficult to calculate overall share		
			Share of assets invested in stablecoins	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in the survey)		
			Metrics nancial ector	Number of large financial service providers offering stablecoin services	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)	It is considered possible to ascertain a certain level of information through information on registered operators in each country.
				Size of stablecoin market relative to US prime money market funds	× Difficult to obtain data	∆ Stablecoin market size is obtainable Market size of US MMFs is difficult to obtain	× Difficult to obtain data	O The size of the market for stablecoin and US MMFs can be obtained.	
		Data Gaps	Amounts and share of holdings of ETFs that offer exposure to stablecoins (by investor type)	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)		
			Profit and loss exposures	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)		

O: All data can be obtained (2) Data availability for stablecoins \triangle : Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent Table 4-3-1-2 Data availability for stablecoins (4/6) ×: No data can be obtained at all -: Not included in this survey Results of availability of data Transmis Data Classif **Surveyed Data** sion Classifica Remarks Crypto Asset Blockchain Research by ication **BC Explorer** Channels tion **Related Database Analytics Tools Experts** Reserve assets invested in regulated Markets / Liquidity of reserve assets / х х × (Not included in this Difficult to obtain data Difficult to obtain data Difficult to obtain data granular and robust survey) data on composition of Data Gaps stablecoins reserve assets Stablecoins Reporting by financial Financial institutions on × х X (Not included in this Sector Difficult to obtain data Difficult to obtain data Difficult to obtain data crypto assets held and Exposure survey) serviced Actual crypto asset transactions by Targets are addresses institutional investors identified as institutional Limited to some Limited to some and financial institutions investors or financial Data to be х X addresses such as addresses such as Difficult to obtain data Difficult to obtain data added (e.g., types of crypto institutions by identified by account identified by account blockchain analytics assets/ stablecoins name, etc. name, etc. preferred by large companies users)

O: All data can be obtained (2) Data availability for stablecoins \triangle : Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent Table 4-3-1-2 Data availability for stablecoins (5/6) ×: No data can be obtained at all -: Not included in this survey Results of availability of data Transmis Data Classif **Surveyed Data** sion Classifica Remarks Crypto Asset Blockchain Research by ication **BC Explorer** Channels tion **Related Database Analytics Tools Experts** Ο Investigate the Token price to be used possibility of obtaining a Х х × Prices for payment can be Difficult to obtain data Difficult to obtain data Difficult to obtain data token price when used obtained from payment in payments. service websites, etc. Stablecoins Use in Targets are addresses Payments Limited to some Limited to some Available identified as payment and X х Number of transactions addresses such as addresses such as Metrics Difficult to obtain data Difficult to obtain data services by blockchain Settlemen identified by account identified by account analytics companies ts name, etc. name, etc. Number of large payment service Х × Х (Not included in this Difficult to obtain data Difficult to obtain data Difficult to obtain data providers supporting survey) stablecoins

O: All data can be obtained (2) Data availability for stablecoins \triangle : Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent Table 4-3-1-2 Data availability for stablecoins (6/6) ×: No data can be obtained at all -: Not included in this survey Results of availability of data Transmis Data Classif **Surveyed** Data sion Classifica Remarks Crypto Asset Blockchain **Research by** ication **BC Explorer** Channels tion **Related Database Analytics Tools Experts** Targets are addresses Limited to some Limited to some identified as payment Number and value of х × addresses such as addresses such as Difficult to obtain data Difficult to obtain data services by blockchain transactions identified by account identified by account analytics companies name, etc. name, etc. Targets are addresses Limited to some Limited to some identified with account addresses such as Jurisdiction of the addresses such as X Х identified by account name and jurisdiction, Stablecoins payers and payees Difficult to obtain data Difficult to obtain data identified by account Use in etc. by blockchain name, etc. and name, etc. and Payments jurisdiction (e.g., VASP) analytics companies jurisdiction (e.g., VASP) Data Gaps and Settlemen Type of transactions ts × Х Х (Not included in this (e.g. remittances, e Difficult to obtain data Difficult to obtain data Difficult to obtain data commerce, trading) survey) Usage in crypto asset Х X X trading platforms, by (Not included in this Difficult to obtain data Difficult to obtain data Difficult to obtain data stablecoin survey) Breakdown of uses of х × X (Not included in this stablecoins Difficult to obtain data Difficult to obtain data Difficult to obtain data survey)

(3) [(3) Data availability for DeFi Table 4-3-1-3 Data availability for DeFi (1/11)							 O: All data can be obtained △: Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all 		
	Transmis	Data			Results of ava	ilability of data	 Not included in this survey 	ali		
	Classif sion Cla ication Channels		Surveyed Data	BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks		
			Total value locked in, gross, adjusted and net; realized volatility	× Difficult to obtain data	∆ Main DeFi can be obtained.	× Difficult to obtain data	△ Main DeFi can be obtained.	Targets are DeFi for which crypto asset- related databases and other data are publicly available		
Del	i Wealth Effects	Available Metrics			Transaction volume of DeFi's Exchange (DEX)	Transactions for each address identified as DEX can be obtained for each transaction, but it is difficult to aggregate the number of transactions.	× Difficult to obtain data	Transactions for each address identified as DEX can be obtained for each transaction, but it is difficult to aggregate the number of transactions.	△ A certain number of transaction data for addresses identified as DEX can be obtained.	Targets are addresses identified as DEX by blockchain analytics companies
			Wallet growth	× Difficult to obtain data	× Difficult to obtain data	Transactions for some addresses identified as unhosted wallets can be obtained on a per transaction basis (historical transaction data can be obtained).	Historical trend data can be obtained for transactions at some addresses identified as unhosted wallets	Investigate the feasibility of obtaining data on the number of transactions and amount of money in unhosted wallets using DeFi.		

(3) Dat	a availabili	ty for DeFi		Table 4-3-1-3 Data availability for DeFi (2/11)			 O: All data can be obtained △: Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all -: Not included in this survey 	
Classif	Transmis	Data Classifica tion		Results of availability of data				
Classif ication	sion Channels			BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Rxperts	Remarks
			Market capitalization and transaction volume of governance tokens	 △ Market capitalization of major tokens can be obtained Number of transactions can be obtained per transaction (difficult to aggregate) 	△ Market capitalization of major tokens can be obtained Number of transactions is difficult to obtain	△ Market capitalization of major tokens is difficult to obtain Number of transactions can be obtained per transaction (difficult to aggregate)	O Market capitalization and number of transactions for major tokens can be obtained.	Major governance tokens for which crypto- asset related databases, etc., publish market capitalization
DeFi	Wealth Effects		Transaction volume in DeFi Lending / Lending rate in DeFi Lending	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	Some DeFi can be obtained.	May be obtained from the website of the relevant DeFi lending service
			Utilization rate of liquidity pool of DeFi Lending and Exchange	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)	
			DeFi yield and return	× Difficult to obtain data	$\stackrel{ riangle}{\to}$ DeFi yields can be obtained, but return is difficult to obtain	× Difficult to obtain data	- (Not included in this survey)	

(3) Dat	a availabili	ty for DeFi					 △: Data generally obtainable, b ▲: Some data can be obtained 					
				Table 4-3-1-3 D	ata availability for DeFi(X: No data can be obtained at-: Not included in this survey					
Classif	Transmis	Data Classifica tion			Results of ava	ilability of data						
ication	sion Channels			BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks				
			Share of retail vs institutional participation	Limited to some addresses such as identified by account name, etc.	× Difficult to obtain data	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc.	Targets are addresses identified as account names, etc. by blockchain analytics companies				
DeFi	Wealth	Wealth Effects	Data Gaps	Data Gaps	Data Gaps		Number of dApps on a blockchain	× Difficult to obtain data	× Difficult to obtain data	x Difficult to obtain data	Angior DApps have been identified and it may be possible to aggregate a certain number of DApps, but research costs are high	Data can be obtained by some BC Explorers (DappRadar, etc.)
			Liquidity pools, DeFi stablecoins, derivatives (entities within the DeFi space, including types of financial institutions (specialized or traditional financial institutions) to understand linkages of DeFi with the rest of the financial system)	× Difficult to obtain data	x Difficult to obtain data	Limited to some addresses such as identified by account name, etc.	Limited to some addresses such as identified by account name, etc.	Targets are addresses identified as financial institutions by blockchain analytics companies				

(3) Data availability for DeFi

(3) Due				Table 4-3-1-3 D	ata availability for DeFi (4/11)	 A: Some data can be obtained, X: No data can be obtained at a -: Not included in this survey 	, but only to a limited extent
Classif	Transmis	Data	Surveyed Data		Results of avai	ilability of data		
ication	sion Channels	Classifica tion		BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks
			Metrics to measure leverage	Some DeFi can be obtained.	× Difficult to obtain data	× Difficult to obtain data	Some DeFi can be obtained.	Investigate the feasibility of obtaining data on overall DeFi liabilities/assets, etc.
DeFi	Wealth Effects	Data Gaps	Information on the governance tokens holders could be obtained from to see to what extent the governance is decentralized (e.g. if the ownership of governance tokens is concentrated, that entity could be considered the actual developer)	Limited such as identified by account name, etc. of the holder address. Dispersion of token holdings by address can be obtained.	× Difficult to obtain data	x Difficult to obtain data	Limited such as identified by account name, etc. of the holder address. Dispersion of token holdings by address can be obtained.	Targets are addresses identified as account names, etc. by blockchain analytics companies

O: All data can be obtained

 \wedge : Data generally obtainable, but some difficult to obtain

(3) Data availability for DeFi

(0) Duc				Table 4-3-1-3 D	ata availability for DeFi (5/11)	 A: Data generally obtainable, i Some data can be obtained X: No data can be obtained at X: Not included in this survey 	, but only to a limited extent								
Classif	Transmis	Data			Results of avai	ilability of data										
ication	sion Channels	Classifica tion	Surveyed Data	BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks								
		Data to be added	TVL (TVL-based market share of major DeFi protocols)	× Difficult to obtain data	△ Main DeFi can be obtained.	× Difficult to obtain data	$\stackrel{ riangle}{}{}^{ riangle}$ Main DeFi can be obtained.	DeFi for which crypto asset-related databases and other data are publicly available.								
										Market Capitaliz Stablecoins	Market Capitalization of Stablecoins	$\stackrel{ riangle}{ ext{Major stablecoins can}}$ be obtained	$\stackrel{ riangle}{ riangle}$ Major stablecoins can be obtained	× Difficult to obtain data	$\stackrel{ riangle}{ ext{Major stablecoins can}}$ be obtained	Targets are stablecoins whose market capitalization is disclosed by crypto asset-related databases, etc.
DeFi	Wealth Effects		Degree of linkage between major DeFi (DEX-Lending, etc.)	△ Transaction data between major DeFi's can be obtained on a per transaction basis (difficult to aggregate)	× Difficult to obtain data	△ Transaction data between major DeFi's can be obtained on a per transaction basis (difficult to aggregate)	O Transaction data between major DeFi's can be obtained.									
			Total tokens locked in cross-chain bridge	∆ The major bridges can be obtained	× Difficult to obtain data	× Difficult to obtain data	$\stackrel{ riangle}{}$ The major bridges can be obtained	Targets are addresses identified as bridges by blockchain analytics companies								
			Cross Chain Bridge's business relationship with VASP	△ Transaction data between main DeFi and bridge can be obtained on a per transaction basis (difficult to aggregate)	× Difficult to obtain data	× Difficult to obtain data	△ A certain number of transaction data for addresses identified as bridges and VASPs can be obtained.	Targets are addresses identified as VASP by blockchain analytics companies								

O: All data can be obtained

 \triangle : Data generally obtainable, but some difficult to obtain

(3) Data availability for DeFi

(3) Data	a avaliadili	ty for Defi		Table 4-3-1-3 D	ata availability for DeFi(6/11)	 △: Data generally obtainable, ▲: Some data can be obtained ×: No data can be obtained at -: Not included in this survey 	, but only to a limited extent
Classif	Transmis	Data			Results of ava	ilability of data		
ication	sion Channels	Channels tion		BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks
			Oracle's market share in TVL and other measures	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)	
DeFi	Wealth Effects	Data to be added	Collateral ratios, leverage ratios, and actual rehypothecation according to collateral type for lending protocols	Some DeFi can be obtained.	× Difficult to obtain data	× Difficult to obtain data	Some DeFi can be obtained.	
			Major remittance address from Treasury Protocol	Limited to some addresses such as identified by account name, etc.	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc.	Limited to some addresses such as identified by account name, etc.	Targets are addresses identified as Treasury Protocol by blockchain analytics companies

(3) Dat	a availabili	ty for DeFi		Table 4-3-1-3 Data availability for DeFi (7/11)			 A: Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all -: Not included in this survey 	
	Transmis	Data			Results of avai	ilability of data		
Classif ication	sion Channels	sion Classifica Surveyed Data Channels tion		BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks
		Available Metrics	Number of clients in infrastructures that provide access to DeFi (e.g. trading platforms, wallet providers)	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	Information from stablecoin operators is considered necessary.
DeFi	Confidenc e Effects		Volume of crypto asset fraud	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc.	Targets are addresses identified as fraudulent transactions by blockchain analytics companies
		Data Gaps	Share of transactions in unbacked crypto assets vs. stablecoins	△ Transaction data for major crypto assets and stablecoins can be obtained on a per transaction basis. (difficult to aggregate)	× Difficult to obtain data	△ Transaction data for major crypto assets and stablecoins can be obtained on a per transaction basis. (difficult to aggregate)	△ A certain number of major crypto assets and stablecoin transaction data can be obtained.	Targets are addresses identified as unbacked crypto-assets or stablecoins by blockchain analytics companies

(3) Dat	a availabili	ty for DeFi		Table 4-3-1-3 D	ata availability for DeFi(8/11)	 △: Data generally obtained △: Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all -: Not included in this survey 		
Classif	Transmis	Data	fica Surveyed Data		Results of ava	ilability of data			
classif sion	sion Channels	Classifica tion		BC Explorer	Crypto Asset Related database	Blockchain Analytics Tools	Research by Experts	Remarks	
			Governance Token Concentration	△ Transaction data for each of the major governance tokens can be obtained (difficult to aggregate)	× Difficult to obtain data	x Difficult to obtain data	△ Transaction data for major governance tokens can be obtained.	Targets are Addresses identified as governor's tokens by blockchain analytics companies	
DeFi	Confidenc e Effects	Data to be added	DeFi Protocol Concentration	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	\triangle Number and value of transactions by main DeFi can be obtained.	Targets are addresses identified as DeFi protocols by blockchain analytics companies	
			Total amount and number of DeFi-related hacking losses	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	△ Total damage and number of major hacking incidents can be obtained.		

(3) Data availability for DeFi

(0) Duc				Table 4-3-1-3 D	ata availability for DeFi (9/11)	 ▲: Some data can be obtained at ∴ No data can be obtained at -: Not included in this survey 	d, but only to a limited extent										
Classif	Transmis	Data			Results of avai	ilability of data												
ication	sion Channels	Classifica tion	Surveyed Data	BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks										
	Financial Sector Exposure					Share of institutional ownership of crypto assets	Limited to some addresses such as identified by account name, etc.	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc.	Limited to some addresses such as identified by account name, etc.	Targets are addresses identified as institutional by blockchain analytics companies							
			Share of assets invested in crypto assets	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)	Difficulty in acquiring a ratio of crypto assets held by financial institutions										
		Available				Number of large financial service providers offering crypto asset services	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)								
DeFi			Volume of crypto asset derivatives market	× Difficult to obtain data	△ Main DeFi can be obtained.	× Difficult to obtain data	- (Not included in this survey)											
			,									-	Open interest of derivative contracts	× Difficult to obtain data	$\stackrel{ riangle}{}$ Main DeFi can be obtained.	× Difficult to obtain data	- (Not included in this survey)	
			Correlations of crypto assets with other asset classes	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)	Difficult to obtain data on crypto assets in financial institutions' assets										
			Share of transaction volume by transaction size	Limited to some addresses such as identified by account name, etc.	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc.	Limited to some addresses such as identified by account name, etc.	Targets are addresses identified as financial institutions by blockchain analytics companies										

O: All data can be obtained

 \triangle : Data generally obtainable, but some difficult to obtain

(3) Data availability for DeFi

Table 4-3-1-3 Data availability for DeFi	(10/11)
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▲: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all -: Not included in this survey

 \triangle : Data generally obtainable, but some difficult to obtain

Classif	Transmis sion Channels	Data Classifica tion	a Surveyed Data					
ication				BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks
	Financial	Data Gaps	Amounts and share of holdings of ETFs that offer exposure to crypto assets by investor type	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)	
DeFi	Sector Exposure	Data to be added	Amount invested in traditional financial assets utilizing tokens locked to smart contracts as collateral	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)	

(3) Data availability for DeFi

(3) Duc				Table 4-3-1-3 Da	ata availability for DeFi (11/11)	 Some data can be obtained at No data can be obtained at Not included in this survey 	, but only to a limited extent
Classif	Transmis	Data						
Classif ication	sion Channels	Classifica tion	Surveyed Data	BC Explorer	Crypto Asset Related Database	Blockchain Analytics Tools	Research by Experts	Remarks
		ayments nd ettlemen	Price of key players (DOT, UNI, LINK)	× Difficult to obtain data	\bigtriangleup Main token prices can be obtained.	× Difficult to obtain data	\bigtriangleup Main token prices can be obtained.	Investigate the
			Delta over one week, one month, three months, six months, one year and 7 day average volume	× Difficult to obtain data	$\stackrel{ riangle}{}$ Main token price increase/decrease can be obtained.	× Difficult to obtain data	△ Main token price increase/decrease can be obtained.	possibility of obtaining the main token prices used in payments
DeFi	Use in Payments and Settlemen ts		Number and value of transactions	Limited to some addresses such as identified by account name, etc.	× Difficult to obtain data	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc.	Targets are addresses identified as payment services by blockchain analytics companies
			Jurisdiction of the payers and payees	x Difficult to obtain data	x Difficult to obtain data	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc. and jurisdiction (e.g., VASP)	Targets are addresses identified as account names, etc. by blockchain analytics companies
			Type of transactions (e.g. remittances, ecommerce, trading)	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	- (Not included in this survey)	Data on transaction type is difficult to obtain

O: All data can be obtained

 \wedge : Data generally obtainable, but some difficult to obtain

4-3. Results of Financial Stability-Related Data Analysis 4-3-2. Research Survey Items

- In this chapter, specific survey items such as the number of address holders and the number and value of transactions were set for each category of VASPs and lending platform for the following four survey items, which were researched by experts from a blockchain analysis company.
- The research results were organized into tables and graphs after organizing the data, and the trends and characteristics seen in the results were discussed.

Survey items	Survey Contents	supplement
Trends in the number of transactions of major VASPs	 The number and value of transactions for the two major VASPs were surveyed in three categories: incoming, within their own company, and outgoing. Three categories were investigated: (1) by category, (2) by DeFi, and (3) by token breakdown among the categories. 	
Trends in the number of transactions by major lending platform	 The number of transactions and the amount of transactions were surveyed for one major lending platform in three categories: incoming, within their own company, and outgoing. Three categories were investigated: (1) by category, (2) by DeFi, and (3) by token breakdown among the categories. 	 Account category names and account names used classifications defined by the blockchain analytics company. DeFi service types were defined by us
Stablecoin related data	• The actual remittance status and frozen transaction data were surveyed for three major stablecoins (USDC, USDC, and DAI).	based on public information on the Web.The transaction amount used the token
DeFi related data	 For the major DeFi projects (Uniswap, Maker, and Aave), we surveyed the size of the DeFi, the number of governor's token holders, collateral ratios, and rehypothecation (collateral diversion). As part of a survey of the overall DeFi situation, we investigated the status of cross-chain bridge usage, hacking damage, cooperation with financial institutions, and the degree of concentration on specific oracle services. 	price and other rates as of April 2023.

Table 4-3-2 Research survey items

4-3. Results of Financial Stability-Related Data Analysis 4-3-3. Major VASPs

(1) Main VASPs: Summary of the number of transactions by VASP-A/VASP-B

- Among the transactions that could be identified, many were between VASPs, suggesting a close linkage of exchanges, etc. In addition, transactions between VASPs and DeFi, and between VASPs and stablecoin issuers/investment companies, etc., were also identified (included in unhosted wallets by definition), suggesting the possibility of a close business relationship among them.
- It should be noted that the results of this analysis do not necessarily represent the overall trend related to VASPs, as the number of transactions with addresses where the account name or other information is unknown accounted for more than 95% of the total number of transactions.

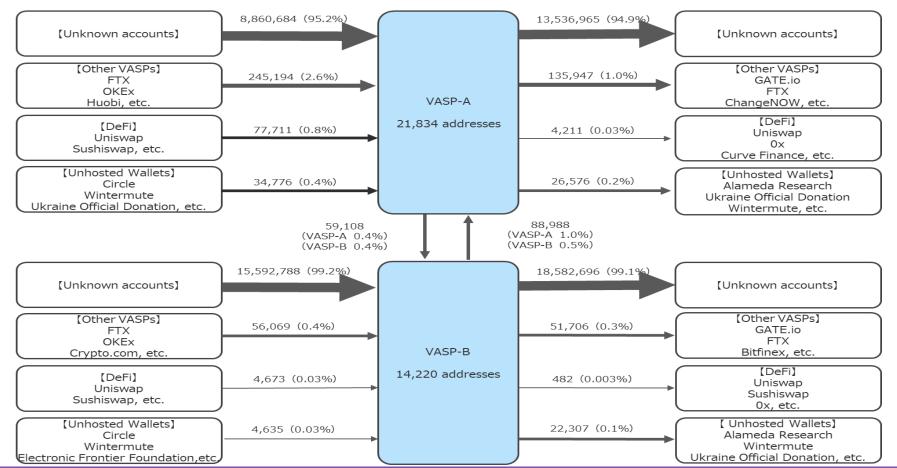
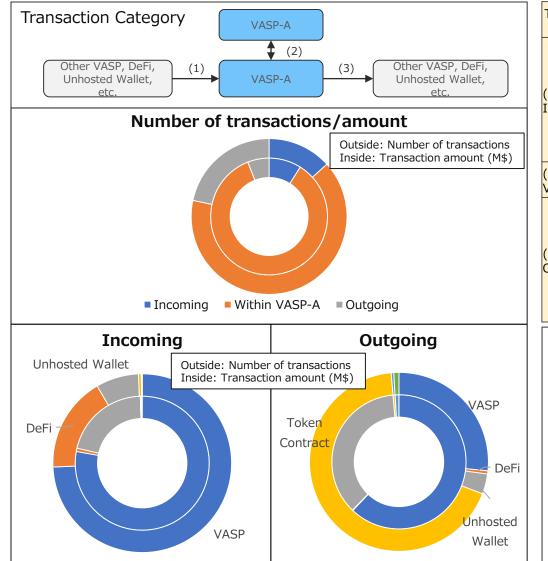


Figure 4-3-3-1 Summary of major VASP transactions

4-3. Results of Financial Stability-Related Data Analysis 4-3-3. Major VASPs (VASP-A)

(2) Major VASPs: VASP-A by Category

Figure 4-3-3-2 VASP-A number of transactions / amount by category



Transaction Account Category		Number of	ransactions	Amount of transaction		
Category	Account Category	Transactions	Transaction ratio	Amount M\$	Amount Ratio	
	VASP	334,182	74.3%	51,239	77.8%	
	DeFi	77,711	17.3%	528	0.8%	
	Unhosted Wallet	34,776	7.7%	13,791	20.9%	
(1) Incoming	Token Contract	2,320	0.5%	27	0.0%	
Incoming	Bridge	566	0.1%	148	0.2%	
	Other	133	0.0%	123	0.2%	
	Total	449,688	100.0%	65,856	100.0%	
(2) Within	VASP	2,198,665	100.0%	625,406	100.0%	
VASP-A	Total	2,198,665	100.0%	625,406	100.0%	
	VASP	195,055	26.6%	27,079	62.1%	
	DeFi	4,211	0.6%	46	0.1%	
	Unhosted Wallet	26,576	3.6%	15,873	36.4%	
	Token Contract	496,837	67.8%	217	0.5%	
	Bridge	3,451	0.5%	398	0.9%	
	Other	6,756	0.9%	0	0.0%	
	Total	732,886	100.0%	43,613	100.0%	

Table 4-3-3-2 VASP-A transactions / amount data by category

[Discussion]

- "(2) Within VASP-A" is the largest number of transactions within transaction categories. \rightarrow Are most of them due to internal fund transfers of wallets.
- "(1) Incoming" is for other VASPs, and "(3) Outgoing" are for token contracts and VASPs, which account for the majority of the number of transactions.

A certain number of DeFi and unhosted wallet transactions are also recognized.

 \rightarrow Token contracts are transfers of tokens compliant with ERC-20 standards (e.g., 62% of all transfers are USDT transfers, but the transaction amounts are small and may be partially double-counted with actual transfers (counted in a different category such as VASP)),

DeFi is intended for DEX use, while unhosted wallets may be intended for subsequent DeFi use, etc.?

4-3. Results of Financial Stability-Related Data Analysis 4-3-3. Major VASPs (VASP-A)

(3) Major VASPs: VASP-A DeFi breakdown among Category

Figure 4-3-3-3 VASP-A number of transactions / amount by DeFi

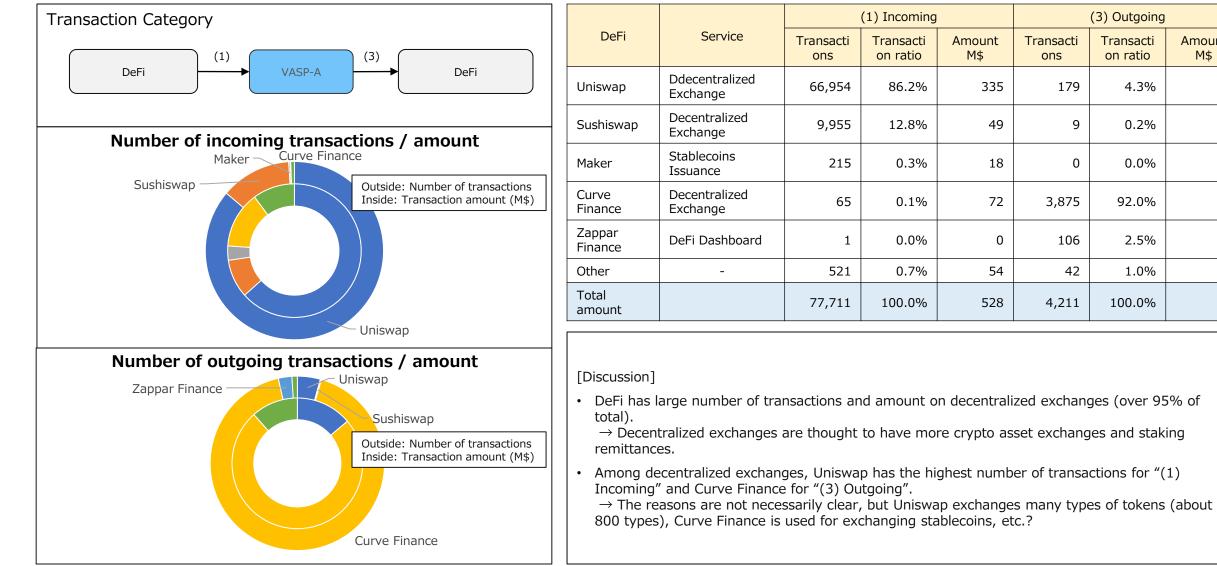


Table 4-3-3-3 VASP-A transactions	/ amount data by DeFi
-----------------------------------	-----------------------

(3) Outgoing

Transacti

on ratio

4.3%

0.2%

0.0%

92.0%

2.5%

1.0%

100.0%

Amount

M\$

6

0

0

34

0

5

46

Transacti

ons

179

9

0

3,875

106

42

4,211

М\$

335

49

18

72

0

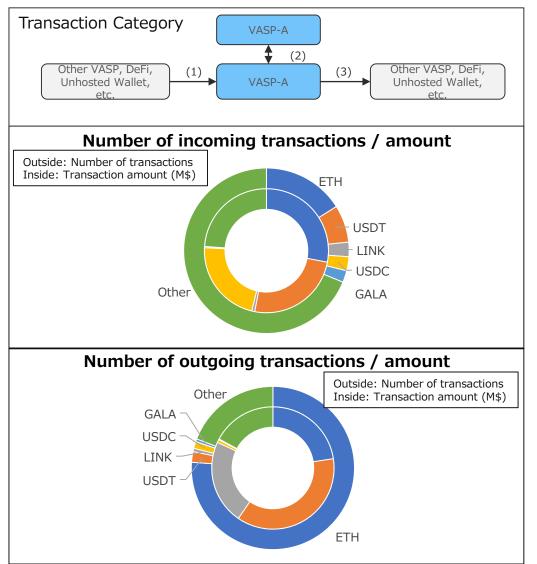
54

528

4-3. Results of Financial Stability-Related Data Analysis 4-3-3. Major VASPs (VASP-A)

(4) Major VASPs: VASP-A by Token

Figure 4-3-3-4 VASP-A number of transactions / amount by token



Token		(1) Incoming			(2) Within VASP-A			(3	3) Outgoin	g
	Classification	Transacti ons	Transacti on ratio	Amount M\$	Transacti ons	Transacti on ratio	Amount M\$	Transacti ons	Transacti on ratio	Amount M\$
ETH	Native Token	72,095	16.0%	18,416	1,581,015	71.9%	196,040	557,875	76.1%	9,845
USDT	Stablecoins	32,849	7.3%	16,509	84,191	3.8%	164,185	15,463	2.1%	16,135
LINK	For External Oracles	12,744	2.8%	513	15,317	0.7%	84,536	4,769	0.7%	9,736
USDC	Stablecoins	12,319	2.7%	14,470	18,349	0.8%	4,396	10,120	1.4%	336
GALA	For use in Games	10,337	2.3%	208	11,500	0.5%	2,300	3,924	0.5%	89
Other	-	309,344	68.8%	15,740	488,293	22.2%	173,949	140,735	19.2%	7,473
Total		449,688	100.0%	65,856	2,198,665	100.0%	625,406	732,886	100.0%	43,613

Table 4-3-3-4 VASP-A transactions / amount data by token

*1) "Other" in incoming refers to the number of transactions for approximately 1,100 types of tokens.

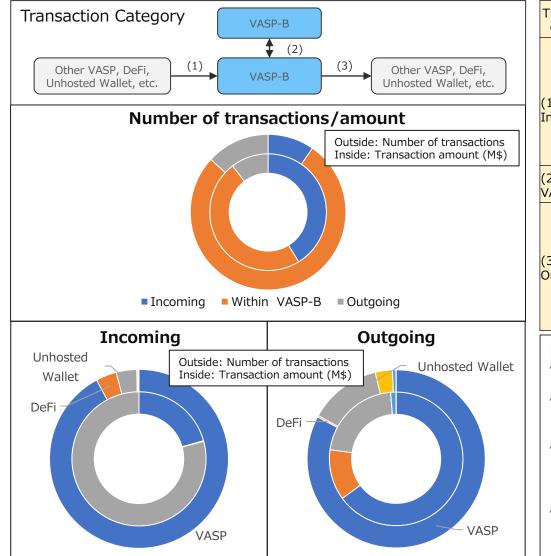
[Discussion]

- ETH, USDT, and USDC have the large number and amount of transactions.
 → This may be due to the fact that these tokens are often used as major tokens and exchanged for other tokens, etc.
- ETH has the largest number and amount of transactions in "(1) Incoming" and "(2) Within VASP-A". In "(3) Outgoing", ETH has the highest number of transactions, USDT has the largest transaction amount. USDT has a higher amount per transaction than the others.
 → ETH and USDT are considered to be used more for fund transfers with other VASPs.
- LINK (external oracle service Chainlink use token) has a large number of transactions.
 → This is considered to be due to the large number of DeFi that use Chainlink, an external oracle service.
- GALA (Gala Games' game usage token) has a next large number o transactions.
 → Possibly due to the use of this game (Gala Games: total supply of 39 billion tokens and 230,000 addresses of token holders as of May 2011).

4-3. Results of Financial Stability-Related Data Analysis 4-3-3. Major VASPs (VASP-B)

(5) Major VASPs: VASP-B by Category

Figure 4-3-3-5 VASP-B number of transactions / amount by category



Transaction		Number of t	transactions	Amount of transaction		
Category	Account Category	Transactions	Transaction ratio	Amount M\$	Amount Ratio	
	VASP	115,177	92.1%	17,190	20.6%	
	DeFi	4,673	3.7%	123	0.1%	
	Unhosted Wallet	4,635	3.7%	65,944	79.2%	
(1)	Token Contract	306	0.2%	0	0.0%	
Incoming	Bridge	192	0.2%	1	0.0%	
	Other	6	0.0%	0	0.0%	
	Total	124,989	100.0%	83,259	100.0%	
(2) Within	VASP	999,058	100.0%	97,707	100.0%	
VASP-B	Total	999,058	100.0%	97,707	100.0%	
	VASP	140,704	82.8%	13,655	64.9%	
	DeFi	482	0.3%	2,583	12.3%	
(3) Outgoing	Unhosted Wallet	22,307	13.1%	4,514	21.5%	
	Token Contract	5,320	3.1%	1	0.0%	
	Bridge	1,072	0.6%	279	1.3%	
	Other	51	0.0%	0	0.0%	
	Total	169,936	100.0%	21,032	100.0%	

Table 4-3-3-5 VASP-B transactions / amount data by category

[Discussion]

- "(2) Within VASP-B" is the largest number of transactions within transaction categories. \rightarrow Most of them are due to internal fund transfers of wallets within VASP.
- Other than within-VASP-B transactions, the majority of transactions with other VASPs accounted for both "(1) Incoming" and "(3) Outgoing" transactions.
 - \rightarrow Most of the funds are considered to be transferred to other major VASPs.
- The next large number of transactions are DeFi and Unhosted Wallets for "(1) Incoming" and Unhosted Wallets for "(3) Outgoing".
 - \rightarrow DeFi is the token exchange for decentralized exchanges, while Unhosted Wallets are considered for DeFi use, etc.?
- Unhosted Wallets is the largest amount of transactions within "(1) Incoming".
 - \rightarrow Could this mean that funds from the VASP wallet were used for DeFi services, etc. through a Unhosted Wallet?

4-3. Results of Financial Stability-Related Data Analysis 4-3-3. Major VASPs (VASP-B)

(6) Major VASPs: VASP-B DeFi breakdown among Category

Figure 4-3-3-6 VASP-B number of transactions / amount by DeFi

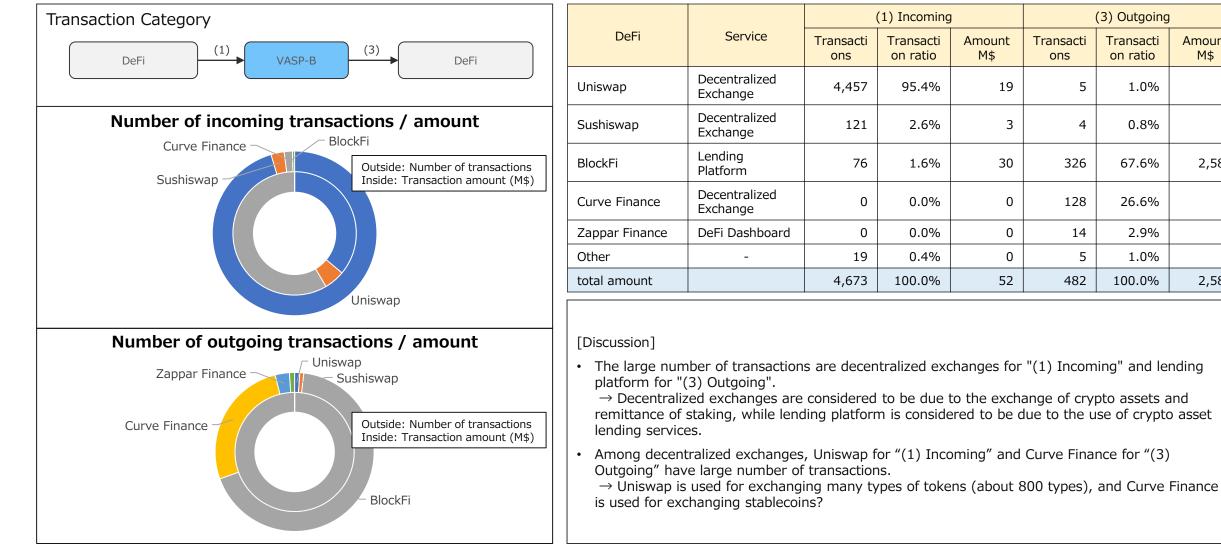


Table 4-3-3-6 VASP-B transactions / amount data by DeFi

(3) Outgoing

Transacti

on ratio

1.0%

0.8%

67.6%

26.6%

2.9%

1.0%

100.0%

Amount

М\$

0

0

0

0

0

2,583

2,583

Transacti

ons

5

4

326

128

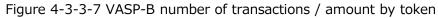
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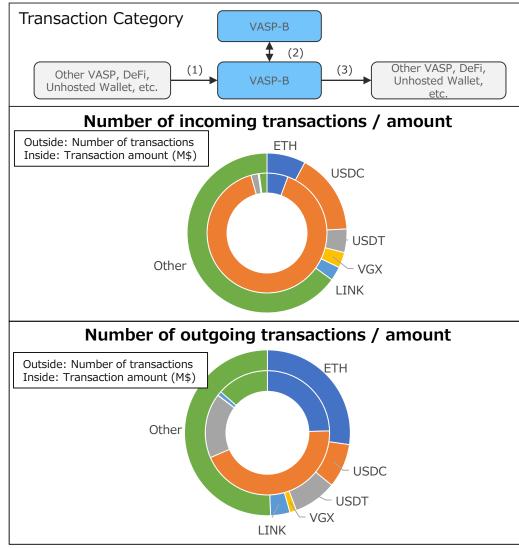
5

482

4-3. Results of Financial Stability-Related Data Analysis 4-3-3. Major VASPs (VASP-B)

(7) Major VASPs: VASP-B by Token





Token		(1) Incoming		(2) Within VASP-B			(3) Outgoing			
	Classification	Transacti ons	Transacti on ratio	Amount M\$	Transacti ons	Transacti on ratio	Amount M\$	Transacti ons	Transacti on ratio	Amount M\$
ETH	Native token	9,804	7.8	4,723	848,157	84.9%	9,345	46,376	27.3%	5,155
USDC	Stablecoins	20,433	16.3%	74,866	45,016	4.5%	82,798	14,612	8.6%	9,249
USDT	Stablecoins	5,957	4.8%	1,636	16,371	1.6%	3,031	14,333	8.4%	3,541
VGX	VASP-issued tokens	3,922	3.1%	47	3,411	0.3%	54	2,201	1.3%	14
LINK	For External Oracles	3,563	2.9%	203	5,038	0.5%	391	6,424	3.8%	233
Other	-	81,310	65.1%	1,713	81,065	8.1%	2,100	85,990	50.6%	2,845
Total		124,989	100.0%	83,188	999,058	100.0%	97,719	169,936	100.0	21,038

Table 4-3-3-7 VASP-B transactions / amount data by Token

*1) "Other" in incoming refers to the number of transactions for approximately 600 types of tokens.

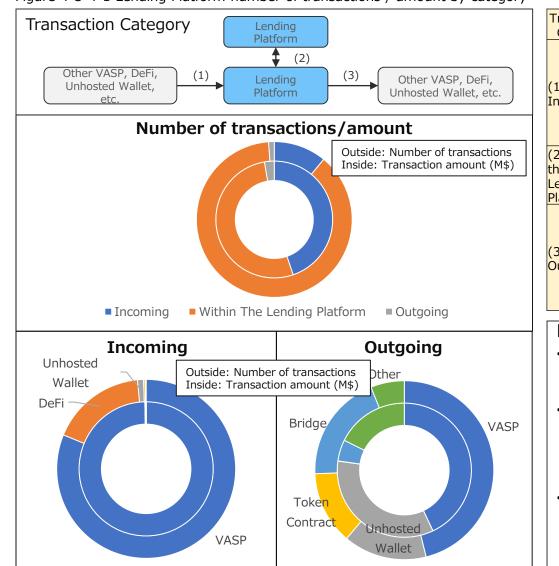
[Discussion]

- ETH, USDT, and USDC have a large number of transactions in all transaction categories.
 → This may be due to the fact that these tokens are often used as major tokens and exchanged for other tokens.
- VGX (tokens issued by VASP Voyager) has a large number of transactions.
 - \rightarrow Probably due to fund transfers between major VASPs. (As of May 2011: total supply of 290 million tokens, 6,500 addresses of token holders)
- LINK (external oracle service Chainlink use token) has a next large number of transactions. \rightarrow This is considered to be due to the large number of DeFi that use Chainlink, an external oracle service.

4-3. Results of Financial Stability-Related Data Analysis 4-3-4. Major Lender

(1) Major Lending Platform: By Category

Figure 4-3-4-1 Lending Platform number of transactions / amount by category



Transaction	Account Category	Number of t	ransactions	Amount of transaction			
Category	Account Category	Transactions	Transaction ratio	Amount M\$	Amount Ratio		
	VASP	12,841	81.2%	6,807	99.7%		
	DeFi	2,727	17.2%	6	0.1%		
(1)	Unhosted Wallet	174	1.1%	15	0.2%		
(1) Incoming	Token Contract	50	0.3%	0	0.0%		
Incoming	Bridge	12	0.1%	0	0.0%		
	Other	10	0.1%	0	0.0%		
	Total	15,814	100.0%	6,828	100.0%		
(2) Within	Lending Platform	126,946	100.0%	8,015	100.0%		
the Lending Platform	Total	126,946	100.0%	8,015	100.0%		
	VASP	782	46.1%	177	43.0%		
	DeFi	0	0.0%	0	0.0%		
(\mathbf{a})	Unhosted Wallet	256	15.1%	141	34.2%		
(3) Outgoing	Token Contract	224	13.2%	0	0.0%		
Outgoing	Bridge	332	19.6%	21	5.1%		
	Other	103	6.1%	73	17.6%		
	Total	1,697	100.0%	412	100.0%		

Table 4-3-4-1 Lending Platform transactions / amount data by category

[Discussion]

- "(2) Within The Lending Platform" is the largest number of transactions within transaction categories.
 - \rightarrow Likely due to internal fund transfers of wallets within their own services.
- Among the transaction categories, the number of transactions in "(1) Incoming" is larger than that in "(3) Outgoing".
- \rightarrow The number of transactions in "(1) Incoming" is considered to be higher due to the use of crypto asset lending platform, while the number of transactions in "(3) Outgoing" is considered to be lower due to the withdrawal of funds.
- By category, the number of transactions with other VASPs is large for both "(1) Incoming" and "(3) Outgoing". The next large number of transactions were DeFi for "(1) Incoming" and Unhosted Wallets such as custodians, etc. for "(3) Outgoing".
- \rightarrow Although the background is not necessarily clear, it is possible that the use of staking services for crypto assets, for example, is a possible purpose of utilization.

4-3. Results of Financial Stability-Related Data Analysis 4-3-4. Major Lending Platform

(2) Major Lending Platform: DeFi Breakdown among Category

Figure 4-3-4-2 Lending Platform number of transactions / amount by DeFi

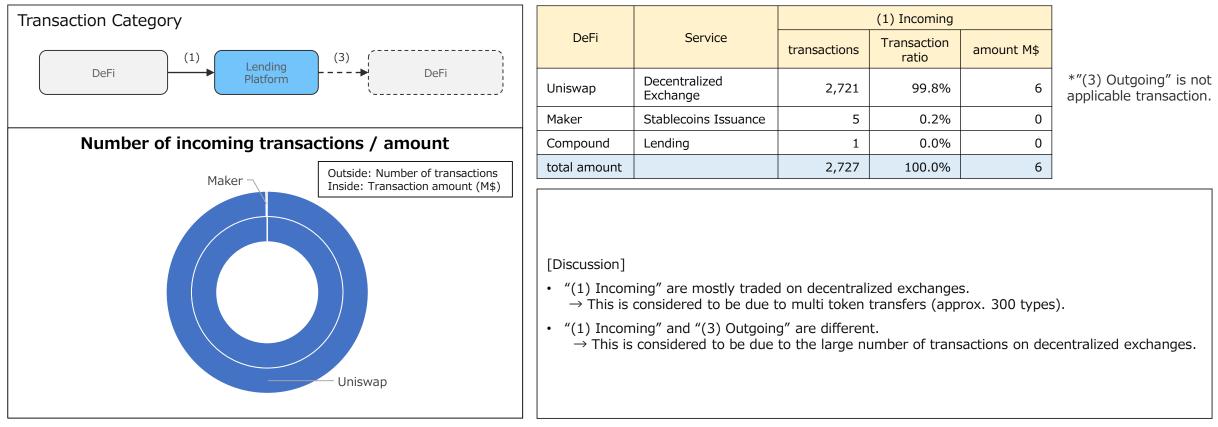
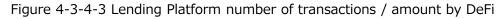
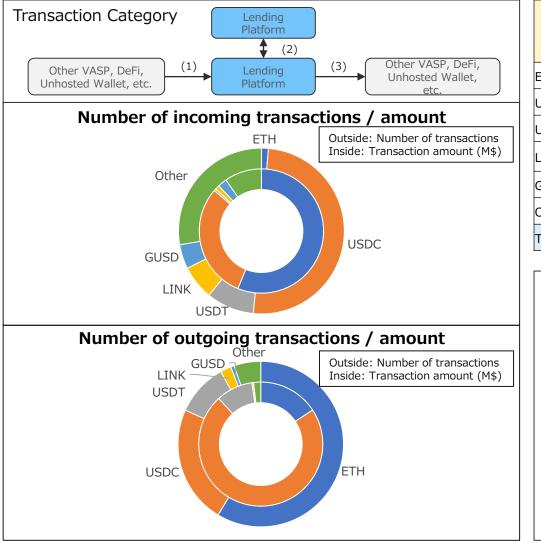


Table 4-3-4-2 Lending Platform transactions / amount data by DeFi

4-3. Results of Financial Stability-Related Data Analysis 4-3-4. Major Lending Platform

(3) Major Lending Platform: By Token





T . 1	Classification	(1	l) Incomin	g	(2) Wi	thin The Lo Platform	ending	(3) Outgoing	
Token		transactio ns	Transacti on ratio	amount M\$	transactio ns	Transacti on ratio	amount M\$	transactio ns	Transacti on ratio	amount M\$
ЕТН	Native token	215	1.4%	3,836	77,958	61.4%	2,346	995	58.6%	65
USDC	Stablecoins	7,941	50.2%	2,057	29,412	23.2%	3,784	392	23.1%	298
USDT	Stablecoins	1,478	9.3%	36	4,932	3.9%	994	174	10.3%	39
LINK	For External Oracles	1,057	6.7%	78	2,614	2.1%	117	36	2.1%	2
GUSD	Stablecoins	750	4.7%	162	5,474	4.3%	476	12	0.7%	0
Other	-	4,373	27.7%	659	6,556	5.2%	298	88	5.2%	8
Total		15,814	100.0%	6,828	126,946	100.0%	8,015	1,697	100.0%	412

Table 4-3-4-3 Lending Platform transactions / amount data by Token

1) "Other" in incoming is the number of transactions for about 300 types of tokens.

[Discussion]

- ETH, USDT, and USDC have a large number of transactions in all transaction categories. \rightarrow This may be due to the fact that these tokens are often used as major tokens and exchanged for other tokens.
- LINK (external oracle service Chainlink use token) has a large number of transactions. \rightarrow This is considered to be due to the large number of DeFi that use Chainlink, an external oracle service.
- GUSD (token issued by VASP Gemini) has a next large number of transactions.
 - \rightarrow This is considered to be due to fund transfers within VASPs.
 - (GUSD: total supply 540 million tokens, token holders 10,000,000 addresses as of May 23)

4-3. Results of Financial Stability-Related Data Analysis 4-3-5. Stablecoins Related

- While there were some trends among the three types of stave coins surveyed, in general, the overwhelming majority of stave coin use was confirmed to be on DeFi.
- No actual cases of address freezing could be confirmed for DAI, an algorithmic stave coin (possibility that the freezing function does not exist).
- Unhosted wallets were observed to have more destination addresses but fewer transactions in number and amount than DeFi and VASP. This may be due to the fact that DeFi and VASP transactions are concentrated in specific remittance destinations (e.g., DEX major VASPs).

Category	Surveyed Items	Surveyed Data	0	n-chain data survey result	ts	Remarks
Category	Surveyed Items	Surveyeu Data	USDC Stablecoins	USDT Stablecoins	DAI Stablecoins	Remarks
		Remittance Addresses	2,057 Addresses [Breakdown] Unhosted Wallet 1,020, Token Contract 698, VASP 128, etc.	1, 657 Addresses 【Breakdown】 Unhosted Wallet 689, Token Contract 630, VASP 151, etc.	899 Addresses 【Breakdown】 Unhosted Wallet 321, Token Contract 311, VASP 105, etc.	
Stablecoins Related	Actual status of stablecoin remittance (main use cases, remittance scale, etc.)	Number of transactions and amount of transactions at the above addresses	7,966,000 TRX/ 1,402.1 billion USD [Breakdown] DeFi 4.059 million TRX/ 751.4 billion USD, VASP 1.95 million TRX/ 1.1 billion USD, Unhosted Wallet 615,000 TRX/ 138.1 billion USD, etc.	8,093,000 TRX/ 236.2 billion USD [Breakdown] VASP 5.109 million TRX/ 2.6 billion USD, DeFi 1.865 million TRX/ 93.4 billion USD, Unhosted Wallet 188,000 TRX/ 21.5 billion USD, etc.	1,272,000TRX / 509.5 billion USD [Breakdown] DeFi 648,000 TRX/ 428.2 billion USD, VASP 193,000 TRX/ 0.08 billion USD, Unhosted Wallet 87,000 TRX/ 19.3 billion USD, etc.	
	Data related to stave coins frozen by the issuing entity (addresses subject to freezing, total amount frozen, etc.)	Addresses subject to freeze	159 addresses	858 addresses	-	As of April 2023
		Total frozen amount/average amount per address	7,859,000 USD/ 21 addresses Average 374,000 USD	440 million USD/ 777 addresses Average 567,000 USD	-	As of April 2023

Table 4-3-5 Stablecoins Data Survey Results

4-3. Results of Financial Stability-Related Data Analysis 4-3-6. DeFi Related

(1) DeFi related

Table 4-3-6-1 Results of DeFi data survey (1/2)

			0	n-chain data survey resul	ts		
Category	Surveyed Items	Surveyed Data	Uniswap Decentralized Exchange	Maker Stablecoin Issuance	Aave Lending Protocol	Remarks	
	Overall size of DeFi (TVL,	TVL per DeFi	4.09 billion USD (UNI)	7.23 billion USD (DAI)	USD 5.18 billion (AAVE)	As of May 2023	
	number of users, market capitalization of stabled	Number of token/stablecoin holders	(Listed in the Governance Token column)	507,000 addresses (DAI)	(Listed in the Governance Token column)	As of May 2023	
	coins, etc.)	Market capitalization of tokens/stablecoins	2.94 billion USD (UNI)	4.98 billion USD (DAI)	940 million USD (AAVE)	As of May 2023	
	DeFi vulnerabilities (e.g., governance tokens and DeFi protocol concentration)	Number of Governance token holder addresses	370,000 addresses (UNI)	95,000 addresses (MKR)	161,000 addresses (AAVE)	As of May 2023	
DeFi Related		Number of transactions by governor token holder address	Incoming: 2,137,000 TRX Outgoing: 2,105,000 TRX	Incoming: 1,139,000 TRX Outgoing: 1,121,000 TRX	Incoming: 966,000 TRX Outgoing: 1,020,000 TRX		
	Degree of concentration on specific Oracle services	Oracle Service usage trends by DeFi	Provide oracle functionality within the project (TWAP: Time Weighted Average Price)	Provide oracle functionality within the project (oracle price feed)	Use of external oracle services (Chainlink)	As of April 2023	
	Lending Protocol related data	Collateral ratios based on collateral type	-	19 types 102% to 5,000%	10 types 125% to 200%	As of April 2023	
		Leverage ratio (Leverage ratio = total debt/total assets)	-	6 types of tokens 96.6% to 99.9%	14 types of tokens 0.4% to 77.9%	As of April 2023	

4-3. Results of Financial Stability-Related Data Analysis 4-3-6. DeFi Related

(1) DeFi related

Table 4-3-6-1 Results of DeFi data survey (2/2)

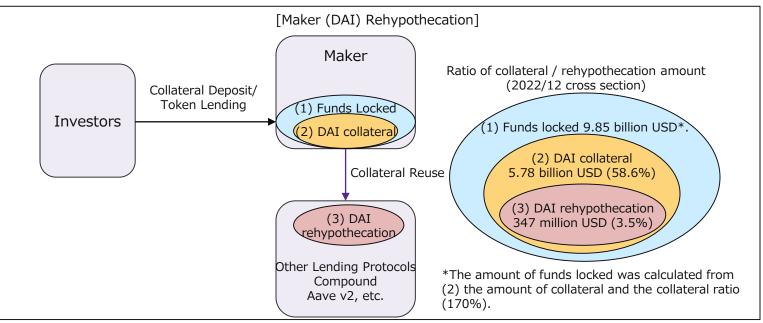
Category	Surveyed Items	Surveyed Data	Data Survey Results (on-chain/off-chain)	Remarks	
		Cross-chain bridge address	18 addresses	[Main Cross-Chain Bridges] As of 2023/4	
				Cross-chain bridge Total amount of tokens locked	
	Actual usage of cross-chain bridges (total amount of tokens locked, transactional	Total amount of tokens locked	9.50 billion USD	Polygon Bridges3.30 billion USDArbitrum Bridges2.29 billion USD	
	relationships with VASPs, etc.)			Avalanche Bridge 1.53 billion USD	
		Number of transactions with VASPs at the above address	10,270,000 addresses	Optimism Bridges1.28 billion USDRonin Bridge700 million USD	
	Actual damage from DeFi-related hacking	Identification of hacked DeFi	10 hacking incidents occurred	For accruals in 2022	
DeFi Related	(total amount of damage, number of cases, etc.)	Total amount of hacking	2.49 billion USD	For accruals in 2022	
Keluteu	Actual linkages between the traditional financial sector and DeFi (e.g., the amount	Addresses held by financial institutions	155 addresses	Information held by blockchain analytics company	
	invested in traditional financial assets using tokens locked to smart contracts as collateral)	Number of transactions linked to financial institutions and DeFi	13,252 transactions		
	Degree of concentration on specific oracle services	External oracle services and number of DeFi used	Chainlink: 263 projects TWAP (provided by Uniswap): 78 projects Chronicle: 2 projects		
	DEX-related data (e.g., liquidity of major token pairs, entities with close trading relationships with the DEX)	Liquidity of major token pairs	Major token pairs: 31 pairs (Uniswap: WETH, USDC, USDT, DAI, MATIC, etc.) Total TVL: 10.13 billion USD		

4-3. Results of Financial Stability-Related Data Analysis 4-3-6. DeFi Related

(2) Rehypothecation (collateral diversion)

	Surveyed Items		Blockchain analytics company research results						
Category		Surveyed Data	Data Source	Data Acquisition Method	Uniswap	Maker	Aave		
DeFi Related	Lending Protocol Related Data	The reality of rehypothecation (collateral diversion)	Etherscan Dune Analytics In-house database	Obtain loan balances where collateral from the surveyed lending protocols ware reused by other lending protocols (as of 2022/12) *Only tokens issued by own project are eligible (DAI/AAVE)	(Not applicable)	Total: 347 million USD [Breakdown] Compound 257 million USD Aave v2 78 million USD Aave v1 4.7 million USD, etc.	Total: 163,081 USD 【Breakdown】 Maker 147,935 USD Euler Finance 14,611 USD, etc.		

Table 4-3-6-2 DeFi (Rehypothecation) Data Survey Results



Renypothecation amount is the value of the 2022/12 closs section								
Maker (D	AI token)	Aave (AA	VE token)					
Rehypothecati on Lender	Amount USD	Rehypothecati on Lender	Amount USD					
Compound	256,862,012	Maker	147,935					
Aave v2	77,652,885	Euler Finance	14,611					
Aave v1	4,748,882	Idle Cash	535					
Euler Finance	3,807,531	Total amount	163,081					
DyDx	1,613,278							
Cream Finance	1,401,051							
Yearn Finance	662,674							
Idle Cash	70,541							
Total amount	346,818,854							

*Rehypothecation amount is the value of the 2022/12 cross section

Source: Dai Stats https://daistats.com/#/

Table 4-3-7 Main Findings

Main Findings	Contents
A certain amount of data is available that may be useful in assessing financial stability impacts.	 It is believed that a certain amount of data that could serve as a starting point for further risk analysis and evaluation could be presented in this initial data analysis, including the transaction relationships among entities such as VASPs and the actual situation of rehypothecation in DeFi. Regarding the availability of data as indicated in the FSB report, it was confirmed that in some cases data that the FSB indicated were available were difficult to obtain for this study, while in other cases data that the FSB indicated were not available were considered to be available for this study (but some data were limited).
The need for analysis using multiple data sources and the effectiveness of expert research	 The type of data that can be obtained and its reliability varies depending on the data source. For example, BC Explorer can obtain data on transactions and balances on the blockchain, but token prices are difficult to obtain. On the other hand, crypto asset-related databases can obtain market data such as crypto asset prices, but transactions on the blockchain are difficult to obtain. Blockchain analysis tools are mainly designed to collect information on high-risk VASPs and trace high-risk transactions, making it difficult to obtain some data related to stablecoin and DeFi (other analysis tools may be able to obtain data related to stablecoin and DeFi (other analysis tools can be obtained with expert research (but only some data are limited). Where there are data sources other than those utilized in this study, such as data obtained through supervisory responses, it may be necessary for the financial authorities to ensure accessibility to multiple data sources and to monitor implications for financial stability.
Data contributing to the analysis of interconnectedness with the existing financial system is difficult to obtain	 In terms of the exposure of financial institutions and the actual status of payment use, not much data was available from the survey results. As a background, it is considered that off-chain data (e.g., information on custodians to whom financial institutions entrust digital assets, transaction and price data for payment use in e-commerce, etc.), which is difficult to obtain from public information, is necessary to grasp the actual status of these transactions. It is possible that many of these data are not currently held by blockchain analytics companies. On the other hand, there is a possibility that data can be obtained through supervisory measures (such as requesting reports from financial institutions) (which were not the subject of this survey), and it would be desirable for the authorities to explore various methods to strengthen monitoring capabilities.

- With regard to the points raised in the FATF report, the results of an investigation into the possibility of data obtaining using various tools and expert research confirmed that, among the data examined in this research, some data, such as conversion to legal tender and crypto asset ATMs/kiosks, are difficult to obtain, but a certain amount of data that could potentially be obtained.
- Note that the results of this survey are only localized based on the analytical tools used in this research and the results of expert research.

(1) VAS	SP data availability	 O: All data can be obtained △: Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent 					
		(1/3)	X: No data can be obtained at-: Not included in this survey	all			
Cator				Results of avai	ilability of data		
Categ ory	Surveyed Items	Surveyed Data	BC Explorer	Crypto Asset Related database	Blockchain analytics tools	Research by experts	Remarks
VASP	Investigation of transaction trends of relevant wallet addresses of major VASPs (including understanding of actual management conditions such as centralized/decentralize d management and intra-group transactions)	Intra-group addresses held by major VASPs	\triangle A certain number of addresses identified as VASPs can be obtained.	× Difficult to obtain data	\triangle A certain number of addresses identified as VASPs can be obtained.	\triangle A certain number of addresses identified as VASPs can be obtained.	Targets are addresses identified as VASP by blockchain analytics companies
		Number of transactions and value of transactions at the above addresses	△ Transaction data for each VASP and identified address can be obtained for each transaction (aggregation is difficult)	× Difficult to obtain data	△ Transaction data for each VASP and identified address can be obtained for each transaction (aggregation is difficult)	△ A certain number of transaction data for VASP and identified addresses can be obtained.	
	Major VASPs and related entities (institutional investors, financial institutions, etc.) and their actual transactions	Addresses of institutional investors and financial institutions	Limited to some addresses such as identified by account name, etc.	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc.	Limited to some addresses such as identified by account name, etc.	Targets are addresses identified as institutional investors, etc. by blockchain analytics companies

(1) VAS	SP data availability		Table 4-4-1-1 [Table 4-4-1-1 Data availability for VASP (2/3)			 △: Data generally obtained ▲: Some data can be obtained, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all -: Not included in this survey 	
Catao				Results of avai	ilability of data			
Categ ory	Surveyed Items	Surveyed Data	BC Explorer	Crypto Asset Related database	Blockchain analytics tools	Research by experts	Remarks	
		DeFi Address	△ A certain number of addresses identified with DeFi can be obtained.	× Difficult to obtain data	△ A certain number of addresses identified with DeFi can be obtained.	△ A certain number of addresses identified with DeFi can be obtained.		
VASP	Actual transactions between VASP- DeFi/unhosted wallets	Unhosted Wallet Address	Limited to some addresses such as identified by account name, etc.	× Difficult to obtain data	Limited to some addresses such as identified by account name, etc.	Limited to some addresses such as identified by account name, etc.	Targets are addresses identified as DeFi or unhosted wallets by blockchain analytics	
>	Derly unnosted wallets	Number of transactions and value of transactions at the above addresses	△ Transaction data for DeFi and unhosted wallets and identified addresses can be obtained around one transaction (difficult to aggregate).	x Difficult to obtain data	△ Transaction data for DeFi and unhosted wallets and identified addresses can be obtained around one transaction (difficult to aggregate).	△ A certain number of transaction data for DeFi and unhosted wallets and identified addresses can be obtained.		

O: All data can be obtained

(1)

Ca

) VAS	P data availability					 ○: All data can be obtained △: Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent 		
			Table 4-4-1-1 Data availability for VASP (3/3) ×: No data can be obtained at -: Not included in this survey				all	
ateg ory				Results of avai	ilability of data			
	Surveyed Items	Surveyed Data	BC Explorer	Crypto Asset Related database	Blockchain analytics tools	Research by experts	Remarks	
VASP	Identification of VASP- related wallet addresses/transactions considered high risk	Addresses determined to be high risk (e.g., addresses used for criminal activity in the past)	× Difficult to obtain data	× Difficult to obtain data	△ A certain number of high risk addresses identified as VASPs can be obtained.	△ A certain number of high risk addresses identified as VASPs can be obtained.	Targets are addresses deemed high risk by blockchain analytics companies	
		Number of transactions and value of transactions at the above addresses	× Difficult to obtain data	× Difficult to obtain data	△ Transaction data for each VASP and identified address can be obtained for each transaction (aggregation is difficult)	△ A certain number of transaction data for VASP and identified addresses can be obtained.		
	Trends by location/region of VASPs (located in jurisdictions with no registration or inadequate regulatory requirements)	Address of unregistered VASP	× Difficult to obtain data	× Difficult to obtain data	A certain number of addresses identified as VASPs can be obtained. Difficult to search for unregistered VASPs	\triangle A certain number of addresses identified as VASPs can be obtained.	Rely on VASP registration information held by blockchain	
		Trends in unregistered VASPs by location and region	× Difficult to obtain data	× Difficult to obtain data	△ A certain number of identified VASP locations can be obtained.	△ A certain number of identified VASP locations can be obtained.	analytics companies in their own databases	

O: All data can be obtained

O: All data can be obtained (2) Possibility of obtaining data from unhosted wallets \triangle : Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent Table 4-4-1-2 Data availability for Unhosted Wallets ×: No data can be obtained at all -: Not included in this survey Results of availability of data Categ **Surveyed Items Surveyed Data** Remarks **Crypto Asset** Blockchain ory **BC Explorer Research by experts Related database** analytics tools Limited to some Limited to some Unhosted Wallet Х X addresses such as addresses such as Difficult to obtain data Difficult to obtain data Address identified by account identified by account P2P) name, etc. name, etc. Targets are addresses Number of transactions Limited to some Limited to some Unhosted Wallet (incl. identified as unhosted х P2P Transaction Facts and value of total P2P addresses such as addresses such as Difficult to obtain data Difficult to obtain data wallets by blockchain identified by account identified by account transactions analytics companies name, etc. name, etc. Limited to some Limited to some Percentage of × X addresses such as addresses such as Fraudulent Transactions Difficult to obtain data Difficult to obtain data identified by account identified by account name, etc. name, etc. Targets are addresses Number of transactions Limited to some Limited to some Limited to some identified as mixing Actual use of PET (e.g., and value of × addresses such as addresses such as addresses such as mixing services) transactions for mixing services by blockchain Difficult to obtain data identified by account identified by account identified by account analytics companies services name, etc. name, etc. name, etc.

(3)

Ca 0

) AML	AML/CFT related data availability Table 4-4-1-3 Data availability for AML/CFT (1/2)						 O: All data can be obtained △: Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all -: Not included in this survey 	
				Results of avai				
ateg ory	Surveyed Items	Surveyed Data	BC Explorer	Crypto Asset Related database	Blockchain analytics tools	Research by experts	Remarks	
AML/CFT related	When converting large amounts of legal tender into large amounts of crypto assets	Addresses of users (accounts) that exchange crypto assets and legal tender	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	Legal tender exchange is mainly done by VASPs, with the possibility of data acquisition by supervisory authorities	
	crypto assets identified as holding stolen funds or receive funds that are suspected to have been in the event	Addresses that are being misused	Limited to some addresses such as identified by account name, etc.	× Difficult to obtain data	△ A certain number of target addresses can be obtained (each address can be obtained, but aggregation is difficult)	△ A certain number of target addresses can be obtained.		
		Address of the counterparty to the above address	Limited to some addresses such as identified by account name, etc.	× Difficult to obtain data	△ A certain number of target addresses can be obtained (each address can be obtained, but aggregation is difficult)	△ A certain number of target addresses can be obtained.		
	Transferring funds from a VASP with no or inadequate customer relationship management (CDD) or identity verification (KYC) processes	Identification of VASPs that appear to have no CDD/KYC process at the time of joining the VASP	× Difficult to obtain data	× Difficult to obtain data	△ A certain number of VASPs can be obtained, but it is difficult to search	△ The VASP for the relevant condition is a certain number can be obtained	Rely on VASP registration information held by blockchain analytics companies in their own databases	

(3) AML	/CFT related data av	 O: All data can be obtained △: Data generally obtainable, but some difficult to obtain ▲: Some data can be obtained, but only to a limited extent ×: No data can be obtained at all -: Not included in this survey 					
Categ				Results of ava	ilability of data		
ory	Surveyed Items	Surveyed Data	BC Explorer	Crypto Asset Related database	Blockchain analytics tools	Research by experts	Remarks
AML/CFT related	Use of crypto asset ATMs/kiosks in locations with a high risk of increased criminal activity	Addresses using crypto asset ATM/kiosk	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	× Difficult to obtain data	Difficult to obtain data on crypto assets ATM/kiosk
	Transactions at crypto asset addresses associated with fraud and extortion, ransomware schemes, sanctioned addresses, darknet marketplaces, or other illegal websites	Cryptographic asset addresses associated with illegal websites	Limited to some addresses such as identified by account name, etc.	× Difficult to obtain data	△ A certain number of target addresses can be obtained (each address can be obtained, but aggregation is difficult)	△ A certain number of target addresses can be obtained.	Targets are addresses identified as fraudulent, extortion, etc. by blockchain analytics companies

4-4. Results of AML/CFT-Related Data Analysis 4-4-2. Research Survey Items

- In this chapter, four survey items were researched by experts from a blockchain analytics company, setting specific survey items such as the number and amount of transactions and the actual use of suspicious transactions by category, such as VASPs and lending platform.
- The research results were organized into tables and graphs after organizing the data, and the trends and characteristics seen in the results were discussed.

Survey Items	Survey Contents	Supplement
Trends in high-risk transaction ratios for major VASPs	• The two main crypto asset traders were surveyed by category for the number of transactions, transaction value, and number of high-risk transactions in three categories: incoming, within their own company, and outgoing.	
Trends in high-risk transaction ratios of major lending platform	• The number of transactions, value of transactions, and number of high-risk transactions by category were examined for one major lending platform in three categories: incoming, within their own company, and outgoing.	 Account category names and account names used classifications defined by the
Trends in high-risk Transaction Ratios for Unhosted Wallets	• The number of transactions, transaction value, and high-risk transactions for unhosted wallets were examined by category, by breakdown of DeFi among categories, and by token, for three categories: incoming, P2P (in unhosted wallets), and outgoing.	 blockchain analytics companies. The transaction amount was calculated using the token price and other rates as of April 2023.
AML/CFT related data	 The survey of suspicious transactions included small-value transactions, consecutive high-value transactions, mixing services, fraudulent/extortion and sanctioned addresses, online gambling services, and other high-risk addresses. The location and regional trends of unregistered VASPs that are not registered in the jurisdiction in which they are located were investigated. 	

Table 4-4-2 Research Survey Items

4-4. Results of AML/CFT-Related Data Analysis 4-4-3. Major VASPs

(1) Major VASPs: Summary of high-risk transactions for VASP-A/VASP-B

- High-risk transactions are mainly remittance from VASP-A/VASP-B and other VASPs (token transfers from high-risk addresses managed by VASPs), all of which account for more than 70% of the total.
 - However, under the definition of high-risk addresses and transactions, many VASP-related transactions are considered to be classified as "high-risk" (i.e., a large number of transactions are sent and received at a small number of addresses managed by the VASP).
 - The actual situation of the addresses (which are likely to be classified as high-risk) and whether they reflect the actual situation requires close examination (details are provided on the next page and beyond).
- A significant number of high-risk transactions with DeFi and unhosted wallets (including some large operators and funds) were also identified.

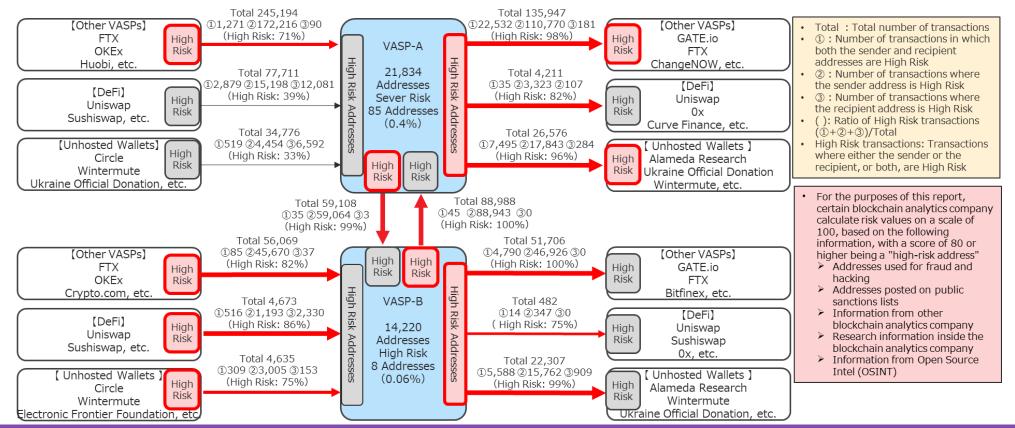
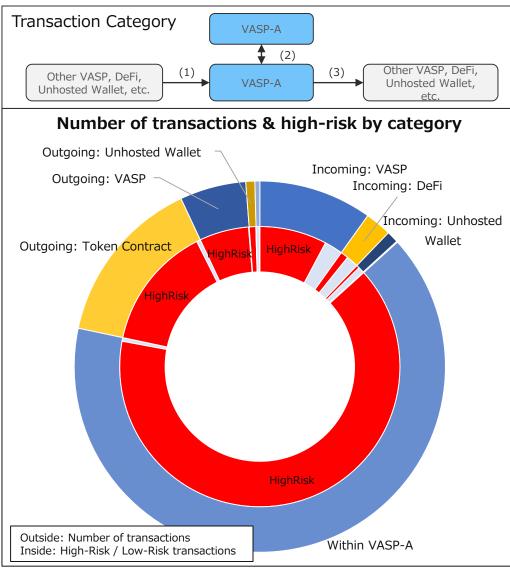


Figure 4-4-3-1 Summary of major VASPs high-risk transactions

4-4. Results of AML/CFT-Related Data Analysis 4-4-3. Major VASPs (VASP-A)

(2) Major VASPs: VASP-A By Category

Figure 4-4-3-2 VASP-A number of transactions / amount by category



Transactior Category	Account Category	Transactions	Transactions	transa High-risk	High Risk		Amour
		Transactions	Ratio	transactions		Amount M\$	Ratio
	VASP	334,182	74.3%	262,565	78.6%	51,239	77.
	DeFi	77,711	17.3%	30,158	38.8%	528	0.
(1)	Unhosted Wallet	34,776	7.7%	11,565	33.3%	13,791	20.
(1) Incoming	Token Contract	2,320	0.5%	1,864	80.3%	27	0.
Incoming	Bridge	566	0.1%	146	25.8%	148	0.
	Other	133	0.0%		31.6%	123	0.
	Total	449,688	100.0%	306,340	68.1%	65,856	100.
(2) Within	VASP	2,198,665	100.0%	2,184,570	99.4%	625,406	100.
VASP-A	Total	2,198,665	100.0%	2,184,570	99.4%	625,406	100.
	VASP	195,055	26.6%	192,585	98.7%	27,079	62.
	DeFi	4,211	0.6%	3,465	82.3%	46	0.
(2)	Unhosted Wallet	26,576	3.6%	25,622	96.4%	15,873	36.
(3) Outgoing	Token Contract	496,837	67.8%	481,607	96.9%	217	0.
outgoing	Bridge	3,451	0.5%	3,117	90.3%	398	0.
	Other	6,756	0.9%	6,157	91.1%	0	0.
	Total	732,886	100.0%	712,553	97.2%	43,613	100.

Some addresses with high transaction volume are determined to be "high risk" based on their track record of being used for fraud and crimes, and all transactions associated with such addresses may be classified as "high risk".

All transactions related to the address may be classified as "high risk" (in reality, the majority of transactions may not be problematic).

• Next higher ratio are "(3) Outgoing", followed by "(1) Incoming".

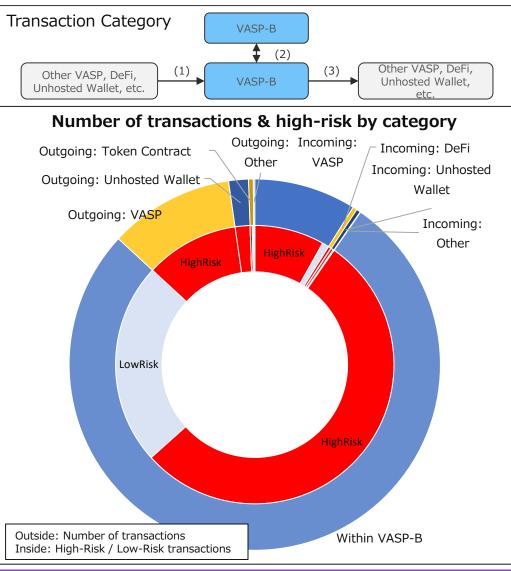
 \rightarrow As "(2) Within VASP-A", it is possible that the number of transactions to a particular high-risk address in VASP is high.

Table 4-4-3-2 VASP-A transactions / amount data by category

4-4. Results of AML/CFT-Related Data Analysis 4-4-3. Major VASPs (VASP-B)

(3) Major VASPs: VASP-B By Category

Figure 4-4-3-3 VASP-B number of transactions / amount by category



Transaction	Account Catagory	Number of t	ransactions	Number of transa		Amount of transaction		
Category	Account Category	Transactions	Transaction ratio	High-risk transactions	High Risk Ratio	Amount M\$	Amount Ratio	
	VASP	115,177	92.1%	104,894	91.1%	17,190	20.6%	
	DeFi	4,673	3.7%	4,039	86.4%	123	0.1%	
(1)	Unhosted Wallet	4,635	3.7%	3,467	74.8%	65,944	79.2%	
(1) Incoming	Token Contract	306	0.2%	304	99.3%	0	0.0%	
Incoming	Bridge	192	0.2%	30	15.6%	1	0.0%	
	Other	6	0.0%	6	100.0%	0	0.0%	
	Total	124,989	100.0%	112,740	90.2%	83,259	100.0%	
(2) Within	VASP	999,058	100.0%	694,838	69.5%	97,707	100.0%	
VASP-B	Total	999,058	100.0%	694,838	69.5%	97,707	100.0%	
	VASP	140,704	82.8%	140,704	100.0%	13,655	64.9%	
	DeFi	482	0.3%	361	74.9%	2,583	12.3%	
(2)	Unhosted Wallet	22,307	13.1%	22,259	99.8%	4,514	21.5%	
(3) Outgoing	Token Contract	5,320	3.1%	3,179	59.8%	1	0.0%	
Outgoing	Bridge	1,072	0.6%	1,072	100.0%	279	1.3%	
	Other	51	0.0	34	66.7%	0	0.0%	
	Total	169,936	100.0	167,609	98.6%	21,032	100.0%	

Table 4-4-3-3 VASP-B transactions / amount data by category

[Discussion]

High-risk transactions have the highest ratio of "(3) outgoing" within transaction categories.
 → "(3) Outgoing" may be due to the high number of transactions from certain high-risk addresses (8 addresses) in the VASP.

It is possible that some addresses with high transaction volume are determined to be "high risk" based on their track record of being used for fraud and crime, and that all transactions associated with such addresses and all transactions related to the address may be classified as "high risk".

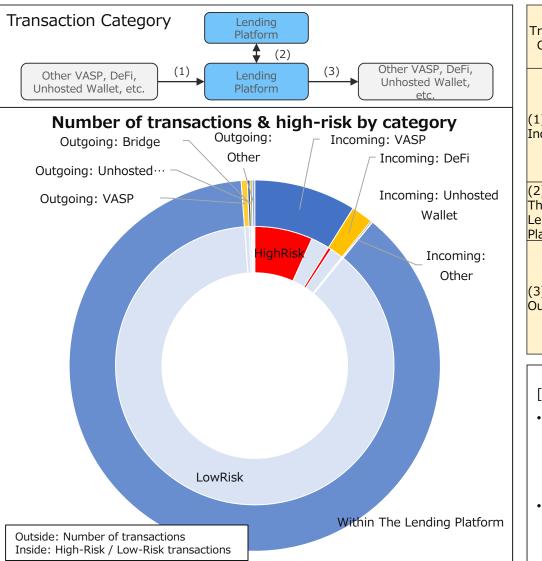
Next, the ratios are high for "(1) Incoming" and "(2) Within VASP-B".
 → As with "(3) Outgoing", the number of transactions for certain high-risk addresses in VASP may be high.

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4-4. Results of AML/CFT-Related Data Analysis 4-4-4. Major Lending Platform

(1) Major Lending Platform: By Category

Figure 4-4-1 Lending Platform number of transactions / amount by category



Transaction	Account Category	Number of t	ransactions	Number o transa	f high-risk Ictions	Amount of transaction		
Category	Account Category	Transactions	Transaction ratio	High-risk transactions	High Risk Ratio	Amount M\$	Amount Ratio	
	VASP	12,841	81.2%	9,733	75.8%	6,807	99.7%	
	DeFi	2,727	17.2%	501	18.4%	6	0.1%	
(1)	Unhosted Wallet	174	1.1%	146	83.9%	15	0.2%	
(1) Incoming	Token Contract	50	0.3%	40	80.0%	0	0.0%	
Incoming	Bridge	12	0.1%	4	33.3%	0	0.0%	
	Other	10	0.1%	9	90.0%	0	0.0%	
	Total	15,814	100.0%	10,433	66.0%	6,828	100.0%	
(2) Within	Lending Platform	126,946	100.0	0	0.0%	8,015	100.0%	
The Lending Platform	Total	126,946	100.0	0	0.0%	8,015	100.0%	
	VASP	782	46.1%	40	5.1%	177	43.0%	
	DeFi	0	0.0	0	0.0%	0	0.0%	
(2)	Unhosted Wallet	256	15.1%	62	24.2%	141	34.2%	
(3) Outgoing	Token Contract	224	13.2%	125	55.8%	0	0.0%	
Catgoing	Bridge	332	19.6%	0	0.0%	21	5.1%	
	Other	103	6.1%	4	3.9%	73	17.6%	
	Total	1,697	100.0	231	13.6%	412	100.0%	

[Discussion]

• High risk transactions have the highest ratio of "(1) Incoming". By category, other VASPs, unhosted wallets, and token contracts have the high ratios.

 \rightarrow For VASPs and token contracts, addresses with a high number of transactions may be more likely to be used for fraud and crime. For unhosted wallets, is it possible that many transfers are made from specific high-risk addresses?

There is no high-risk transactions of "(2) Within The Lending Platform".

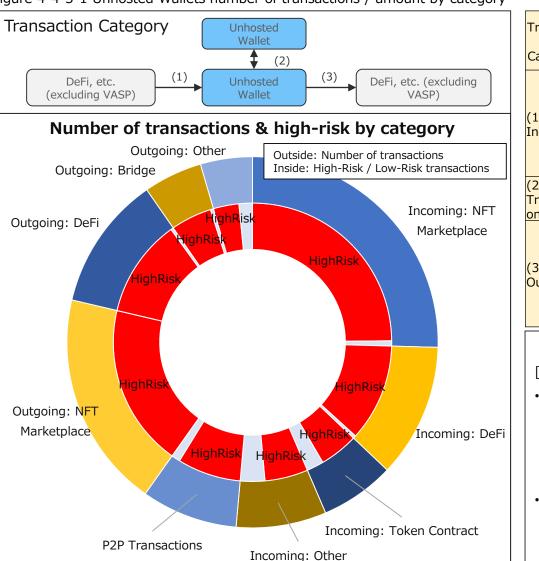
 \rightarrow The number of transactions at the Lending Platform's address is smaller than that of VASPs, etc., which may make it less likely to be used for fraud or crime.

Table 4-4-1 Lending Platform transactions / amount data by category

4-4. Results of AML/CFT-Related Data Analysis 4-4-5. Unhosted Wallets

(1) Unhosted Wallets: By Category

Figure 4-4-5-1 Unhosted Wallets number of transactions / amount by category



*MEV (Maximum Extractable Value) BOT:. Automated execution software that analyzes the waiting transaction pool (mempool) of the Ethereum blockchain and obtains value by front running, etc.

Table 4-4-5-1 Unhosted Wallets transactions / amount data by category

Transacti		Addrossos	Number of transactions		Number of h transacti	-	Amount of transaction		
on Category		Addresses	Transactions	Transacti on ratio	High-risk transactions	High Risk Ratio	Amount M\$	Amount Ratio	
	NFT Marketplace	190	1,468,421	49.5%	1,433,197	97.6%	152	0.2%	
	DeFi	8,752	672,335	22.7%	653,168	97.1%	30,537	44.9%	
(1)	Token Contract	1,753	373,899	12.6%	259,006	69.3%	22,378	32.9%	
(1) Incoming	Bridge	895	271,589	9.1%	265,744	97.8%	10,179	15.0%	
Incoming	MEV BOT*	103	152,869	5.2%	11,550	7.6%	989	1.5%	
	Other	549	29,174	1.0%	11,861	40.7%	3,818	5.6%	
	Total	12,242	2,968,287	100.0%	2,634,526	88.8%	68,053	100.0%	
(2) P2P	P2P Transactions	5,989	484,394	100.0%	425,882	87.9%	28,967	100.0%	
Transacti ons	Total	5,989	484,394	100.0%	425,882	87.9%	28,967	100.0%	
	NFT Marketplace	77	1,088,944	46.9%	1,088,322	99.9%	1,083	2.1%	
	DeFi	4,799	674,524	29.1%	656,787	97.4%	22,876	44.0%	
(2)	Token Contract	1,361	248,009	10.7%	160,917	64.9%	16,077	30.9%	
(3) Outgoing	Bridge	500	295,673	12.7%	275,222	93.1%	10,149	19.5%	
outgoing	MEV BOT*	27	3,963	0.2%	2,834	71.5%	344	0.7%	
	Other	329	9,179	0.4%	7,087	77.2%	1,498	2.9%	
	Total	7,093	2,320,292	100.0%	2,191,169	94.4%	52,027	100.0%	

[Discussion]

- High risk transactions have the highest ratio of "(3) Outgoing". By category, other VASPs, unhosted wallets, and bridges have high ratios.
 - \rightarrow VASPs and bridges may be more likely to be used for fraud and crime, as addresses with a high number of transactions are more likely to be used for fraud and crime.
 - VASPs and bridges are likely to be used for fraud and crime.

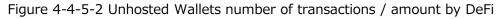
Unhosted wallets may have a high number of transactions of certain high-risk addresses?

Next, the ratios are high for "(1) Incoming" and "(2) P2P transactions".

 \rightarrow This is considered that the ratio of transactions of high-risk addresses is high, as is the case with "(3) Outgoing"?

4-4. Results of AML/CFT-Related Data Analysis 4-4-5. Unhosted Wallets

(2) Unhosted Wallets: DeFi breakdown among Category



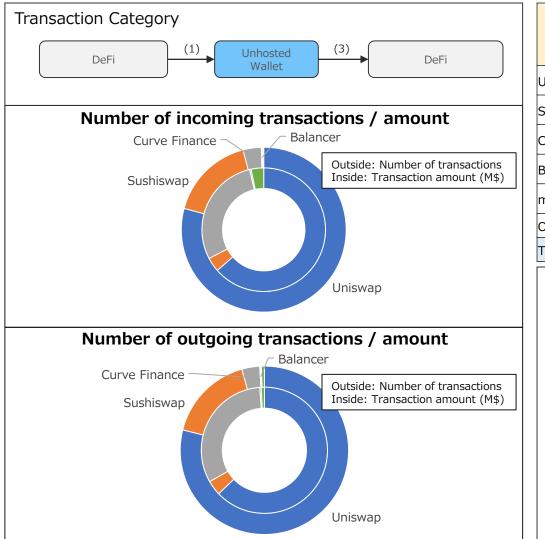
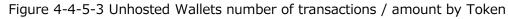


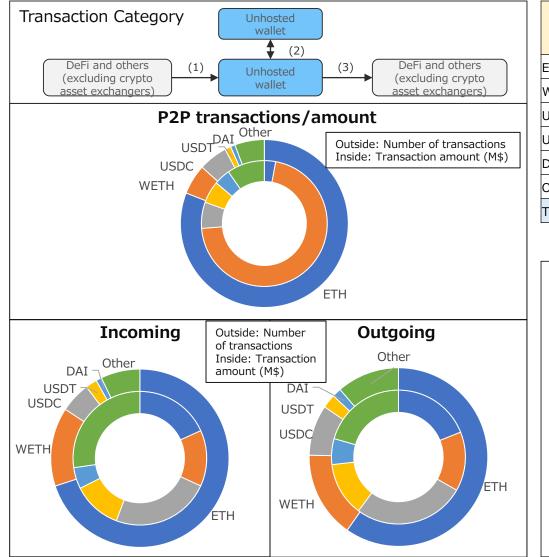
Table 4-4-5-2 Unhosted Wallets transactions / amount data by DeFi

				(1) Incoming		(3) Outgoing			
	DeFi	Service	transactio ns	Transacti on ratio	amount M\$	transactio ns	Transacti on ratio	amount M\$	
	Inicuran	Decentralized Exchange	532,196	79.2%	19,400	532,203	78.9%	14,393	
	Kuchicwan	Decentralized Exchange	113,024	16.8%	1,144	113,155	16.8%	869	
		Decentralized Exchange	23,941	3.6%	8,874	23,170	3.4%	7,348	
)	Ralancor	Decentralized Exchange	1,279	0.2%	3	1,288	0.2%	2	
	mStable	Stablecoins Issuance	897	0.1%	114	837	0.1%	81	
	Other	-	998	0.1%	1,002	3,871	0.6%	183	
	Total		672,335	100.0%	30,537	674,524	100.0	22,876	
·)	 exchanges. → Likely to Of the dece Incoming" → Uniswap The number → Details 	ncoming" and "(3 o exchange of cry entralized exchan and "(3) Outgoin o is considered a er of transactions need to be scrution nanged on decen	pto assets, ges, Uniswa g". multi-type t "(1) Incomi nized, but fo	liquidity prov p has a large oken exchan ng" and "(3) r example, i	vision, and r e number of ge (approx. Outgoing" s there a po	emittance o transaction 700 types) is almost the ssible move	f staking. s for both "(e same for e	1) ach DeFi.	

4-4. Results of AML/CFT-Related Data Analysis 4-4-5. Unhosted Wallets

(3) Unhosted Wallets: By Token





· · · · · · · · · · · · · · · · · · ·										
		(1	L) Incoming		(2) P	2P Transad	tions	(3) Outgoing		
Token	Classification	transactio ns	Transacti on ratio	amount M\$	transactio ns	Transacti on ratio	amount M\$	transactio ns	Transacti on ratio	amount M\$
ETH	Native token	2,076,058	69.9%	12,420	391,975	80.9%	843	1,386,001	59.7%	9,853
WETH	Native token	424,295	14.3%	9,219	28,025	5.8%	20,524	362,035	15.6%	7,439
USDC	Stablecoins	164,494	5.5%	16,299	26,908	5.6%	1,952	212,593	9.2%	14,020
USDT	Stablecoins	61,740	2.1%	8,053	5,655	1.2%	1,642	58,577	2.5%	6,769
DAI	Stablecoins	30,959	1.0%	3,503	4,241	0.9%	1,209	37,793	1.6%	3,255
Other	-	210,741	7.1%	18,559	27,590	5.7%	2,797	263,293	11.3%	10,691
Total		2,968,287	100.0%	68,053	484,394	100.0%	28,967	2,320,292	100.0%	52,027
*Tho p	umbor of trans	actions for	about 900	tunes of t	akona in "	Othor" for	"(1) Incom	ning" and a	haut 700	+

Table 4-4-5-3 Unhosted Wallets transactions / amount data by Token

*The number of transactions for about 800 types of tokens in "Other" for "(1) Incoming" and about 700 types of tokens in "Other" for "(3) Outgoing.

[Discussion]

• ETH and WETH (tokens pegged 1:1 to ETH) has large number of transactions in all transaction categories.

Next, there are many transactions of stablecoins such as USDC, USDT, DAI, etc.

- \rightarrow This is considered to be due to their use in exchanges with other tokens (e.g. to fix the amount of money)
- WETH is not among the major VASPs or lending platform in terms of number and amount of transactions, but has a high number and amount of transactions in the unhosted wallet.
 → WETH is an ERC-20 compliant token to facilitate the use of ETH for DeFi, NFT services, etc., and this is thought to be due to its high use by DeFi, etc.

(1) Number of addresses associated with holders of stolen funds

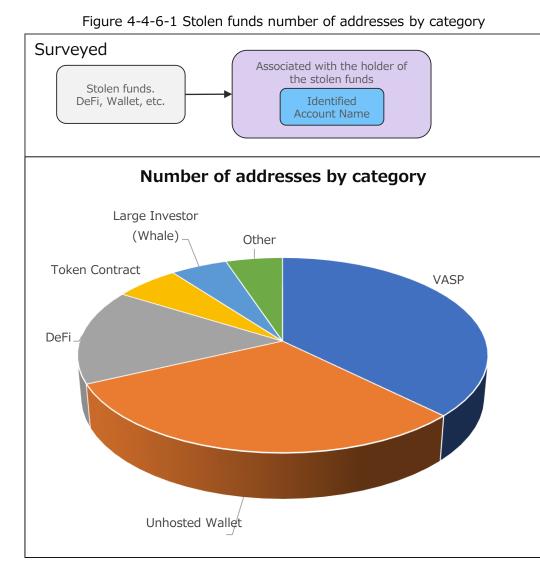


Table 4-4-6-1 Stolen Funds addresses data by category

Ratio

37.4%

30.7%

15.8%

5.9%

5.2%

5.1%

100.0

Addresses

1,567

1,285

662

246

216

215

4,191

Identification of address holder	Addresses	Ratio
Identified address holders	4,191	2.6%
Unknown address holders	158,918	97.4%
Total	163,109	100.0%

[Discussion]

Category

Unhosted Wallet

Token Contract

Large Investor

(Whale) Other

Total

VASP

DeFi

- Of the addresses associated with the holders of the stolen funds, only 3% of all addresses were able to identify the account names.
 - \rightarrow Even if the addresses could be identified by the databases of blockchain analytics company, most of the account names could not be identified, suggesting that it is extremely difficult to identify accounts from off-chain information and other sources.
- Regarding the addresses that were identified, VASP addresses are the highest ratio. Unhosted wallets were next higher ratio.
- \rightarrow It is possible that VASP and Unhosted Wallet have many addresses that were used for crimes and frauds in the past. However, since VASPs are considered to be relatively easy to identify, this may not necessarily indicate an overall trend.

(2) Number of addresses using mixing services

Figure 4-4-6-2 Mixing services number of addresses by category

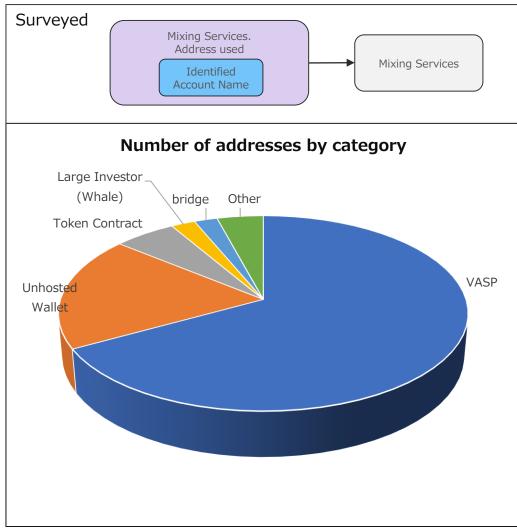


Table 4-4-6-2 Mixing services addresses data by category

Category	Addresses	Ratio		Ide
VASP	22,257	67.0%		add
Unhosted Wallet	6,304	19.0%		Ide hol
Token Contract	1,866	5.6%	-	Un
Large investor (Whale)	727	2.2%		hol Tot
Bridge	692	2.1%	L	
Other	1,390	4.2%		
Total	33,236	100.0%		

Identification of address holder	Addresses	Ratio
Identified address holders	33,236	0.4%
Unknown address holders.	9,001,940	99.6%
Total	9,035,176	100.0%

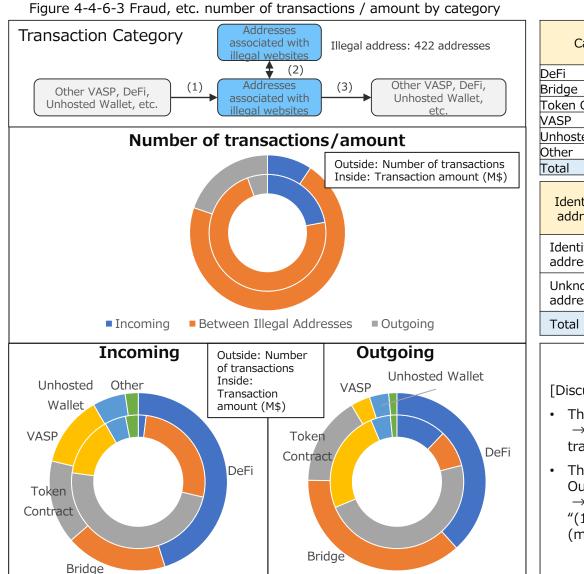
[Discussion]

- The majority of mixing services related addresses identified were related to Tornado Cash.
- Of the addresses that used mixing services, account names could be identified for 0.4% of the total.

 \rightarrow Even if the addresses that used the mixing service could be identified through the investigation of on-chain transaction information, most of the account names could not be identified, suggesting that it is extremely difficult to identify accounts from off-chain information and other sources.

By category, VASP addresses are the highest ratio. Unhosted wallets are next higher ratio. \rightarrow Possibility that VASP users or unhosted wallet owners are utilizing mixing services for some purpose (including ML).

(3) Number of transactions and amount of addresses associated with fraud and extortion, ransomware, sanctioned addresses



	(1) Incoming			(2) Between Illegal Addresses				(3	(3) Outgoing		
Category	Transactio	Transactio	Amount	Transactio	Tran	sactio	Amount	Transactio	Transactio	Amount	
	ns	n ratio	M\$	ns	nr	atio	M\$	ns	n ratio	M\$	
DeFi	5,496	45.1%	23	5				9,902	38.3%	37	
Bridge	2,246	18.5%	323	8				9,544	36.9%	27	
Token Contract	1,846	15.2%	584	-				4,187	16.2%	b 144	
VASP	1,568	12.9%	177	7				910	3.5%	5 75	
Unhosted Wallet	728	6.0%	62					903	3.5%	b 14	
Other	289	2.4%	37	7				386	1.5%	5	
Total	12,173	100.0	1,206	92,730		100.0	3,945	5 25,832	100.0) 303	
Identification of		(1)	Incoming					(3) Outgoii	ng		
address holder	Transacti	ons	nsaction ratio	Amount I	4 \$	Trans	sactions	Transactio ratio	on Amo	unt M\$	
Identified address holders	25,	832	14.3%	3	03		12,173	13.7	%	1,206	
Unknown address holders	154,	762	85.7%	3,0	02		76,399	86.3	%	2,267	
Total	180,	594	100.0%	3,3	05		88,572	100.0	%	3,472	

[Discussion]

- The largest number and amount of transactions were "(2) Between Illegal Addresses"
 → Possible that large number of internal transactions are executed by dummies to prevent
 transactions from being identified. (e.g., mixing services)
- The largest number of transactions by category was DeFi for both "(1) Incoming" and "(3) Outgoing". The largest transaction amount was Token Contract.

 \rightarrow DeFi is considered to be token exchange by decentralized exchanges such as Uniswap for both "(1) Incoming" and "(3) Outgoing", and token contract is considered to be by token transfer (mainly WETH, etc.).

(4) Number and amount of transactions for addresses remittance from online gambling services

VASP

Figure 4-4-6-4 Gambling services number of transactions / amount by category Transaction Category Other VASP, DeFi, Online (3) Unhosted Wallet, Service etc. 9 Address Number of transactions/ amount by category Attacks, fraud, ransomware, etc. Unhosted Wallet Token Contract

Table 4-4-6-4 Gambling services transactions / amount data by category								
		(3) Outgoing						
Category	Number of transactions	Transactions Ratio	Amount M\$					
VASP	24,495	85.6%	8					
Token Contract	3,961	13.8%	0					
Unhosted Wallet	143	0.5%	13					
Attacks, fraud, ransomware, etc.	12	0.0	0					
Total	28,611	21						
Identification of address	(3) Outgoing							
Identification of address holder	Number of transactions	Transactions Ratio	Amount M\$					
Identified address holders	28,611	7.4% (1)	21					
Unknown address holders	357,354	92.6% (%)	874					
Total	385,965	100.0	895					

Table 4-4-6-4 Gambling services transactions / amount data by category

[Discussion]

• By category, VASPs are the largest number of transactions.

 \rightarrow Wallets of major VASPs are most likely to be used as a destination for money transfers for online gambling services

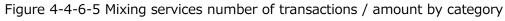
• The next large number of transaction is token contract.

 \rightarrow This is considered to be for the transfer of stablecoins (USDC, DAI, etc.)

Outside: Number of transactions Inside: Transaction amount (M\$)

97

(5) Number and amount of transactions for addresses transferred from the mixing service



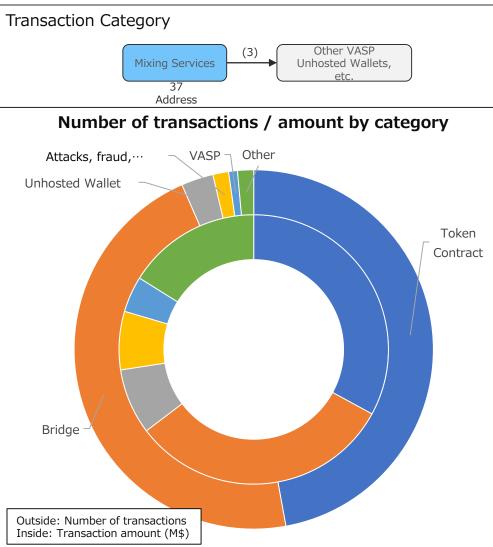


Table 4-4-6-5 Mixing services transactions / amount data by category									
		(3) Outgoing							
Category	Number of transactions	Transactions Ratio	Amount M\$						
Token Contract	9,341	47.1%	22						
Bridge	9,183	46.3%	22						
Unhosted Wallet	572	2.9%	5						
Attacks, fraud, ransomware, etc.	280	1.4%	5						
VASP	157	0.8%	3						
Other	287	1.4%	11						
Total	19,820	100.0	68						
Telentification of address		(3) Outgoing							
Identification of address holder	Number of transactions	Transactions Ratio	Amount M\$						
Identified address holders	19,820	11.7%	68						
Unknown address holders	148,879	88.3%	2,491						
Total	168,699	100.0%	2,560						

[Discussion]

• By category, token contracts are the largest number of transactions.

 \rightarrow Likely used for money transfers (mainly WETH, etc.) to access mixing services.

• The next large number of transactions is Bridge (transferring funds to other chains). \rightarrow This is considered to transfer of mixing funds on Ethereum blockchain to other blockchains.

(6) AML/CFT related

Table 4-4-6-6 AML/CFT data survey results (1/9)

			Research Results				Data held and
Category	Surveyed Items	Surveyed Data	Data Source	Data Obtaining Method	Data Obtaining Results *1	Data Obtaining Results *2	investigative potential of supervised entities
ctions	Structuring VA transactions (e.g. exchange or transfer) in small amounts, or in	User (account) address	Etherscan In-house database	Obtain addresses where small transactions of less than 0.1 ETH (approx. 25,000 yen) were sent	65,482 addresses [Breakdown] VASP 42,889, Unhosted Wallet 11,362, etc.	27,013,172 addresses	
to		Number of transactions and value of transactions at the above addresses	Etherscan In-house database	Obtain the number of transactions and amount of money for the above address	Number of transactions: 69,669,928 Amount: 4.61 billion USD	Number of transactions: 167,267,783 Amount: 9.14 billion USD	VASP stores CDD/EDD information in association with the
Indicators Related	Making multiple high	User (account) address	Etherscan In-house database	Get addresses where the same sender has sent transactions of 10 ETH (approx. 18,000 USD) or more in the last 24 hours	3,351 addresses [Breakdown] VASP 1,436, Unhosted Wallet 846, etc.	59,127 addresses	user's address. Is it possible to narrow down and report suspicious transactions with a higher degree of certainty by combining
be as with a second seco	value transactions in short succession, such as within a 24 hour period	Number of transactions and value of transactions at the above addresses	Etherscan In-house database	Obtain the number of transactions and amount of money for the above address	Number of transactions:2,631,151 Amount: 810.9 billion USD	Number of transactions:3,874,440 Amount: 1,202.7 billion USD	with the left column?
Red		Frequency of transactions at the above addresses	Etherscan In-house database	Obtain the ratio of the number of transactions by time for the above transactions	Within 1 hour: 88.4%, 1-12 hours: 10.1%, 13-24 hours: 1.5%	-	

*1: Data Obtaining Results: Survey results for addresses for which the blockchain analytics company identified category names and account names

(6) AML/CFT related

Table 4-4-6-6 AML/CFT data survey results (2/9)

				Research	າ Results		Data held and
Category	Surveyed Items	Surveyed Data	Data Source	Data Obtaining Method	Data Obtaining Results *1	Data Obtaining Results *2	investigative potential of supervised entities
ated to		User (account) address	Etherscan In-house database	Get addresses that have sent 10 ETH or more transactions within 24 hours of the address's first deposit	703 Addresses [Breakdown] Unhosted Wallet 335, VASP 151, etc.	213,668 addresses	VASP stores CDD/EDD
Indicators Related Transactions	Making multiple high value transactions to a newly created or to a previously inactive account	Number of transactions and value of transactions at the above addresses	Etherscan In-house database	Obtain the number of transactions and amount of money for the above address	Number of transactions: 2,164 Amount: 885 million USD	Number of transactions: 259,264 Amount: 74.56 billion USD	information in association with the user's address. Is it possible to narrow
Flag		Frequency of transactions within a certain period of time for the above addresses	Etherscan In-house database	Obtain the ratio of the number of transactions by time for the above transactions	Within 1 hour: 36.5%, 1-12 hours: 57.5%, 13-24 hours: 6.0%	_	down and report suspicious transactions with a higher degree of certainty by combining with the left column?
Red		Number of transactions at the above address	Etherscan In-house database	Obtain the number of transactions by time for the above transactions	Within 1 hour: 813, 1-12 hours: 1,280, 13-24 hours: 132		

*1: Data Obtaining Results: Survey results for addresses for which the blockchain analytics company identified category names and account names

(6) AML/CFT related

			Research Results				Data held and
Category	Surveyed Items	Surveyed Data	Data Source	Data Obtaining Method	Data Obtaining Results *1	Data Obtaining Results *2	investigative potential of supervised entities
tions	Transferring VAs immediately to multiple VASPs	User (account) identification	Etherscan In-house database	Obtain wallets to send to multiple VASPs	997 addresses [Breakdown] Unhosted Wallet 731, VASP 200, etc.	1,086 addresses	VASP stores CDD/EDD information in association with the user's address.
ed to Transactions		Identification of VASPs, etc.	Etherscan In-house database	Identify the VASPs sent by the above wallets	9,268 addresses	_	Is it possible to narrow down and report suspicious transactions with a higher degree of certainty by combining with the left column?
s Related	Accepting funds suspected as stolen or	Addresses that are being misused	Etherscan In-house database	Obtain addresses of known attackers	422 addresses	-	-
Red Flag Indicators	fraudulent depositing funds from VA addresses that have been identified as holding stolen funds, or VA addresses linked to the holders of stolen funds	Address of the counterparty to the above address	Etherscan In-house database	Obtain a wallet to send to known attackers	4,191 addresses [Breakdown] VASP 1,567, Unhosted Wallet 1,285, etc.	163,109 addresses	VASP stores CDD/EDD information in association with the user's address. Is it possible to narrow down and report suspicious transactions with a higher degree of certainty by combining with the left column?

*1: Data Obtaining Results: Survey results for addresses for which the blockchain analytics company identified category names and account names

(6) AML/CFT related

Table 4-4-6-6 AML/CFT data survey results (4/9)

			Research Results				Data held and
Category	Surveyed Items	Surveyed Data	Data Source	Data Obtaining Method	Data Obtaining Results *1	Data Obtaining Results *2	investigative potential of supervised entities
to Transaction	A new user attempts to trade the entire balance of VAs, or withdraws the VAs and attempts to send the entire balance off the platform	New User Accounts	Etherscan In-house database	Get a new user for VASP	137 addresses	57,415 addresses	
		All balance transactions made by the above accounts	Etherscan In-house database	Calculate the user's balance and obtain the transaction that empties the balance	175 transactions	75,993 transactions	- VASP stores CDD/EDD
Indicators Related Patterns	Making frequent transfers in a certain period of time (e.g. a day, a week, a month, etc.) to the same VA account	User (account) address	Etherscan In-house database	Obtain the same address from multiple addresses that have been remitted to repeatedly	106 addresses [Breakdown] Fraud/Attackers 28, VASP 23m Unhosted Wallet 12, etc.	25,543 addresses	information in association with the user's address. Is it possible to narrow down and report suspicious transactions with a higher degree of certainty by combining with the left column?
Red Flag Indicato		Number of transactions and value of transactions at the above addresses	Etherscan In-house database	Obtain the number of transactions and amount of money for the above address	Number of transactions: 21,338 Amount: 50.87 million USD	Number of transactions: 1,688,075 Amount: 1.46 billion USD	
		Frequency of transactions at the above addresses	Etherscan In-house database	Obtain the ratio of the number of transactions by time for the above transactions	Within 1 hour: 44.3%, Within 24 hours: 54.7%, 1 day - 30 days: 1.0%	-	

*1: Data Obtaining Results: Survey results for addresses for which the blockchain analytics company identified category names and account names

(6) AML/CFT related

				, ,	(-/-/		
			Research Results				Data held and investigative
Category	Surveyed Items	Surveyed Data	Data Source	Data Obtaining Method	Data Obtaining Results *1	Data Obtaining Results *2	potential of supervised entities
ed to	VAs transferred to or from wallets that show previous patterns of activity associated with	Address of VASP, which operates mixing and tumbling services and P2P platforms	Etherscan In-house database	Obtain VASP address with mixing service	116 addresses	-	
s Relat ty	the use of VASPs that operate mixing or tumbling services or P2P platforms	Addresses such as wallet (user account) where transactions were made with mixing services, etc.	Etherscan In-house database	Obtain addresses of hosted/unhosted wallets, etc., where mixing services, etc., have been transacted	33,236 addresses [Breakdown] VASP 22,257, Unhosted Wallet 6,304, etc.	9,035,176 addresses	VASP stores CDD/EDD information in association with the user's address. Is it possible to narrow down and report
Red Flag Indic Ano	Transactions making use of mixing and tumbling services, suggesting an intent to obscure the flow of illicit funds between known wallet addresses and darknet marketplaces	Addresses with transactions using mixing and tumbling services.	Etherscan In-house database	Obtain the address of the mixing service	37 Addresses All Tornado Cash *Related tools include Railgun *OFAC sanctioned list of 90 addresses (26 of which overlap)	_	suspicious transactions with a higher degree of certainty by combining with the left column?

Table 4-4-6-6 AML/CFT data survey results (5/9)

*1: Data Obtaining Results: Survey results for addresses for which the blockchain analytics company identified category names and account names *2: Data Obtaining Results: All data obtained in this survey (including addresses for which category names, etc., were not identified)

(6) AML/CFT related

					(0, 5)		
				Research	n Results		Data held and
Category	Surveyed Items	Surveyed Data	Data Source	Data Obtaining Method	Data Obtaining Results *1	Data Obtaining Results *2	investigative potential of supervised entities
Anonymity	Funds deposited or withdrawn from a VA address or wallet with direct and indirect exposure links to known suspicious sources,	Data identifying known and suspected sources of information	Etherscan, DappRadar, IC3, CISA, OFAC In-house database	Obtain rogue wallet addresses linked to the darknet from DappRadar, IC3, CISA, and OFAC	12 addresses Identify the URL of the Darknet Web and the address associated with it.	_	
Related to	including darknet marketplaces, mixing/tumbling services, questionable gambling sites, illegal activities (e.g. ransomware) and/or theft reports	Addresses that have done business with the above questionable sources	Etherscan, DappRadar, IC3, CISA, OFAC In-house database	Obtain the above fraudulent address and the address where the transaction took place	Sent: 38 addresses/50 items Received: 4 addresses/5 items	Sent: 38 addresses/50 items Received: 143 addresses/ 193 items	
Red Flag Indicators	Receiving funds from or sending funds to VASPs whose CDD or know- your-customer (KYC) processes are demonstrably weak or non-existent.	Identification of VASPs that appear to have no CDD/KYC process at the time of joining the VASP	Etherscan In-house database	Obtain addresses of VASPs that do not appear to have CDD/KYC processes when joining VASPs	788 Addresses *Get the address of a VASP that is not decentralized and not registered in the location	_	If a VASP itself identifies an unregistered VASP in the process of conducting due diligence on a counterparty VASP, is it possible to provide information to the authorities, etc.?

Table 4-4-6-6 AML/CFT data survey results (6/9)

*1: Data Obtaining Results: Survey results for addresses for which the blockchain analytics company identified category names and account names *2: Data Obtaining Results: All data obtained in this survey (including addresses for which category names, etc., were not identified)

(6) AML/CFT related

			Table 4-4-0-0 AML	/CFT data survey results	(7/9)		
				Research	n Results		Data held and
Category	Surveyed Items	Surveyed Data	Data Source	Data Obtaining Method	Data Obtaining Results *1	Data Obtaining Results *2	investigative potential of supervised entities
Red Flag Indicators about Senders or Recipients	A customer's VA address appears on public forums associated with illegal activity	Address of unauthorized transactions	Etherscan, Reddit Bulletin Board, Darknet forums & marketplaces In-house database	Obtain unauthorized wallet addresses linked to the darknet from DappRadar, Reddit message boards, and darknet forums	12 addresses	-	
Red Flag] about Se Recip	A customer is known via publicly available information to law enforcement due to previous criminal association	Address of unauthorized transactions	Etherscan, IC3, CISA, OFAC In-house database	Collect sanctioned addresses published in IC3, CISA, and OFAC	Sent: 50 addresses/ 61 transactions Received: 61 addresses/74 transactions	Sent: 629 addresses/ 2,224 transactions Received: 311 addresses/ 580 transactions	Is it possible for VASPs
itors in the s or Wealth	Transacting with VA addresses that are connected to known fraud, extortion, or ransomware schemes, sanctioned addresses, darknet marketplaces, or other illicit websites	Cryptographic asset addresses associated with illegal websites	CISO OFAC ,. Threat Intelligence (Darknet), CISA, IC3 , CSAM Data (Hades) In-house database	Identify addresses associated with fraud and extortion, ransomware schemes, sanctioned addresses, darknet marketplaces, or other illegal websites	Sent: 2,407 addresses/ 117,650 transactions Received: 142 addresses/ 14,357 transactions	Sent: 56,235 addresses/ 264,817 transactions Received: 172 addresses/ 91,344 transactions	themselves to provide information to the authorities by reporting suspicious transactions, etc., if they discover fraudulent transactions by their customers?
Red Flag Indicators in the Source of Funds or Wealth	VA transactions originating from or destined to online gambling services	Addresses of users of online gambling services	Etherscan Word Cloud, ETHplorer.io In-house database	Identify the address of the online gambling service and obtain the address of the transaction using that address	Sent: Gambling 7 addresses, User 257 addresses/ 28,742 transactions Received: Gambling 2 addresses, User 2 addresses, 3 transactions	Sent: Gambling 13 addresses, User 102,392 addresses/ 386,225 transactions Received: Gambling 11 Addresses, User 113,524 addresses/ 627,912 transactions	

Table 4-4-6-6 AMI /CET data survey results (7/9)

*1: Data Obtaining Results: Survey results for addresses for which the blockchain analytics company identified category names and account names

(6) AML/CFT related

Table 4-4-6-6 AML/CFT	data survev results	(8/9)
		(- / - /

		Surveyed Items Surveyed Data		Research Results			
Category	Surveyed Items		Data Source	Data Obtaining Method	Data Obtaining Results *1	Data Obtaining Results *2	investigative potential of supervised entities
dicators in of Funds or Ith	A customer's funds which are sourced directly from third- party mixing services or wallet tumblers	Addresses with transactions using mixing and tumbling services.	Etherscan In-house database	obtain the remitted address from the mixing service	Mixing 37 addresses, Recipients 769 addresses/ 19,820 transactions	Recipients 53,268 addresses/ 168,699 transactions	Is it possible for VASPs themselves to provide information to the
Red Flag Indicators i the Source of Funds (Wealth	Bulk of a customer's source of wealth is derived from investments in VAs, ICOs, or fraudulent ICOs, etc.	Address of unauthorized transactions	Etherscan In-house database	obtain addresses transferred from known fraudulent/fraudulent addresses	Fraud/Illicit 147 addresses, Recipients 59 addresses/ 1,121 transactions	Fraud/Illicit 1,142 addresses, Recipients 1,186 addresses/ 4,742 transactions	authorities by reporting suspicious transactions, etc., if they discover fraudulent transactions by their customers?
tors Related ical Risks	Customer's funds originate from, or are sent to, an exchange that is not registered	Addresses of exchanges not registered in the jurisdiction in which they are located	Etherscan In-house database	Obtain the address of the VASP for transactions transferred to the user from a VASP that is not registered in the jurisdiction in which it is located	139 addresses	-	VASP stores CDD/EDD information in association with the user's address. Is it possible to narrow
Red Flag Indicators to Geographical	in the jurisdiction where either the customer or exchange is located	User addresses transferred from exchanges that are not registered in your jurisdiction	Etherscan In-house database	Obtain the user's address for transactions transferred to the user from a VASP that is not registered in the jurisdiction in which it is located	8,275 addresses [Breakdown] VASP 8,266 addresses (including hosted wallets) 8,266, Other 9, etc.	_	down and report suspicious transactions with a higher degree of certainty by combining with the left column?

*1: Data Obtaining Results: Survey results for addresses for which the blockchain analytics company identified category names and account names

(6) AML/CFT related

Category		Surveyed Data		Data held and			
	Surveyed Items		Data Source	Data Obtaining Method	Data Obtaining Results *1	Data Obtaining Results *2	investigative potential of supervised entities
Red Flag Indicators Related to Geographical Risks	Customer sends funds to VASPs operating in jurisdictions that have no VA regulation, or have not implemented AML/CFT controls.	Identification of jurisdictions requiring attention	Etherscan, OFAC, In-house database	Obtain countries on the OFAC Sanctioned Countries List and U.S. Military Export Prohibited Countries List	 49 countries/regions* (1) List of OFAC sanctioned 25 countries/regions, (2) List of U.S. military export prohibited 24 countries/regions *(1) and (2) include duplicates. 	-	 same as above VASPs themselves should be utilized after confirming that there are no differences between the high-risk countries, etc. defined by the blockchain analytics company and the settings on the tool side.

Table 4-4-6-6 AML/CFT data survey results (9/9)

*[Jurisdictions requiring attention] 49 countries/regions

(1) List of 25 OFAC sanctioned countries/regions https://ofac.treasury.gov/sanctions-programs-and-country-information

Áfghanistan, Balkans, Belarus, Myanmar, Central Africa, China, Cuba, North Korea, Congo, Ethiopia, Hong Kong, Iran, Iraq, Lebanon, Libya, Mali, Nicaragua, Somalia, South Sudan, Sudan, Syria, Russia, Venezuela, Yemen, Zimbabwe

(2) List of 24 U.S. military export prohibited countries/regions https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M/part-126/section-126.1

Belarus, Myanmar, China, Cuba, Iran, North Korea, Syria, Venezuela, Afghanistan, Cambodia, Central Africa, Cyprus, Congo, Ethiopia, Eritrea, Haiti, Iraq, Lebanon, Libya, Russia, Somalia, South Sudan, Sudan, Zimbabwe

*1: Data Obtaining Results: Survey results for addresses for which the blockchain analytics company identified category names and account names

Table 4-4-7 Main Findings

Main Findings	Contents
Certain usefulness of research of experts compared to blockchain analytic tools	 Regarding the possibility of acquiring the data pointed out in the FATF report, among the AML/CFT-related data examined in this study, many of the data were difficult to obtain using analytical tools, but many of the data could be obtained using research by experts. In addition to analytical tools, experts can also be used to understand AML/CFT-related data. However, since this study also confirmed the existence of a certain number of data that are difficult to obtain, it will be necessary in the future to clarify the possibility of obtaining such data, including the provision of information by supervisors.
Difficulty in high-risk determination	 Although many VASP-related transactions are classified as "high-risk" under the definition of high-risk addresses and transactions (VASP-related addresses with an extremely large number of transactions are labeled as "high-risk"), it is highly likely that many transactions related to such addresses are normal transactions, and it is difficult to draw a general conclusion from the results of this survey. Although many of the addresses with unidentified accounts may be considered to be unhosted wallets, the nature of the risk is unknown, and it is extremely difficult to accurately understand the actual situation (e.g., volume of transactions) and assess the risk of P2P and other types of transactions.
Close interconnection between VASP, Unhosted Wallet (including P2P), and DeFi	 In addition to transactions between VASPs, close business relationships existed between VASPs, unhosted wallets (including P2P), and DeFi, and a significant number of high-risk transactions were identified (although difficult to define). In order to reduce ML/TF/PF risk for P2P and highly decentralized DeFi, which are not regulated in many jurisdictions, and taking into account the difficulties of data analysis for unhosted wallets and P2P mentioned above, it is possible that stronger controls on VASPs, which are relatively easier to deal with in terms of regulatory measures (such as EDDs for transactions between VASPs and unhosted wallets, etc.) may be effective.
Need for efforts to improve the reliability of data and data analysis	 The results of this research confirmed that only about 10% of the Ethereum blockchain data had been identified by the blockchain analytics companies as category or account names, which means that the company was not necessarily able to analyze data from the entire decentralized financial system. The category and account names identified, as well as the determination of high-risk transactions, all rely on information from blockchain analytics companies, and since the identification of account names, etc. and the calculation of risk scores are done independently by blockchain analytics companies, the content may differ from one analytics company to another. Therefore, when conducting a fact-finding survey, it is considered necessary to improve the reliability of the data by not relying on data from a single company, for example, by comparing survey results from multiple analysis companies.

Chapter 5: Conclusion

(1) Insights gained from conducting data analysis

• A certain amount of training is required for financial authorities to properly use analytical tools and researchers. It is also necessary to understand the limitations of the current tools.

(It is not a silver bullet that will significantly improve monitoring capabilities.)

- Sanitization of data obtained from tools and researchers (e.g., removal of outliers) and understanding of context (e.g., that token contract-related transactions are not actual token transfers, but rather smart contract behavior associated with transfers between addresses (EOAs) such as stablecoins) are required.
- Tool companies and solutions vary (some are specialized for investigative authorities, others are mainly used by businesses rather than authorities), and it is necessary to select the right tool for the right application, understand the overall picture of tools, and gather information on the latest technology trends.
- On the other hand, there is a possibility that the tools may provide useful insights into the interconnections in the crypto asset market (e.g., connections between VASPs, unhosted wallets, and DeFi) and the actual state of illicit transactions, including those not subject to regulatory oversight (DeFi, P2P, etc.), and the identification rate and accuracy of the tools will improve in the future. Should the use of tools and researchers be explored, taking into account the possibility that the identification rate and accuracy of tools will improve in the future?

(2) Initial Financial Regulatory Implications

- Given the close relationship between regulated entities (VASPs) and others (unhosted wallets, P2P, (fully decentralized) DeFi), the possibility that strengthening controls over VASPs could indirectly reduce the risk of P2P and other unregulated activities.
- There are many smart contract related transactions on Ethereum, such as DeFi, ERC-20 related token contracts (e.g. stablecoin), and bridges. Hacking, etc., has been frequent, and is improving security a major issue?
- Although it is possible to identify addresses that appear to be involved in crimes, it is not easy to identify the actual owners, etc. (The analysis tools used in this research were not intended for criminal investigations, but specialized analysis tools may yield different results).

Appendix

(1) Data analysis methods of the research literature

- We surveyed the main research literature analyzing on-chain/off-chain data to understand the actual status of blockchain, and investigated the data analysis methods used.
- The investigation identified multiple analytical methods utilizing address clustering and graph theory/machine learning for the purpose of identifying multiple account administrators and suspicious transactions for blockchain addresses.
- However, the results of the research are limited to understanding overall trends and identifying some target addresses, and analysis from publicly
 available on-chain/off-chain data is considered to be limited in understanding the actual status of the blockchain.

Data distinction	Data Analysis Methodology	Overview of Analysis Methodology	Results of a research
On-chain data	Clustering	 Grouping blockchain addresses and other data analysis methods into broad groups of desired data 	 The following three studies on clustering of blockchain addresses were identified Addresses appearing in the input of a transaction Classification of addresses by transaction patterns such as address reuse and airdrop (token distribution) Bloom filter (probabilistic data structure) to characterize addresses, etc.
	Graph Theory	 Applying mathematical theory, which consists of a set of nodes (vertices) and edges (lines connecting nodes), the characteristics of nodes and edges are analyzed based on relationships such as their concentration, with nodes as blockchain addresses and edges as transactions. 	 Confirmed that graph theory has been studied in clustering blockchain addresses and analyzing transaction trends
analysis	Machine Learning	 Build models based on sample data and make predictions (judgments) without being explicitly programmed Multiple algorithms exist for different learning methods (supervised learning, unsupervised learning, reinforcement learning, etc.) 	 Of the machine learning, the following three analysis methods were identified as being studied, including detection of illegal addresses Random Forest Support Vector Machine XGBoost
	Other	 Investigate methods of analyzing on-chain data other than those listed above 	 Identified 1 case of analysis of smart contract code and transaction logs (Analyzed behavior suspected to be a ponzi scheme and investigated with detection tools)
Off-chain data analysis	Publicly available data screening	 Using publicly available off-chain data to select valid data for blockchain analysis 	 The following three data analysis cases were identified Twitter's 'Whale Alert' Tied to Bitcoin Price Rise Identifying criminal activity-related addresses from public blockchain posting sites Search academic databases and journals to investigate market manipulation techniques, etc.

Table A-1-1 Methods of data analysis of research literature

(2) Research literature survey results

Table A-1-2 Results of research literature survey (1/5)

			Summary	On-chain data analysis				- Off-chain
No.	Source	Document-name		Clustering	Graph Theory	Machine Learning	Other	data analysis
1-1	The Journal of Finance Volume 75, Issue 4	Is Bitcoin Really Untethered?	 Analysis of blockchain data from October 2014 to March 2018 on Bitcoin's relationship with Tether (USDT: a stablecoin pegged to the US dollar) to price increases. Reported speculation of market manipulation of the Bitcoin price through the issuance of Tether 	Grouping addresses that appear in the transaction input				
1-2	Finance Research Letters Volume 49	The Intraday Bitcoin Response to Tether Minting and Burning Events: Asymmetry, Investor Sentiment, and "Whale Alerts" on Twitter	 Analyzed blockchain data from October 2014 to January 2021, when Tether was issued, to investigate Bitcoin's response to Tether's issuance. Investigators reported that Tether's issuance event was a "Whale Alert" notifying Twitter of high-value transactions in near real-time, and positive investor sentiment drove Bitcoin prices higher. 					Analyzing Whale Alert's Twitter Announcement and Bitcoin's Price Rise
2	Financial Cryptography and Data Security 2020	Address Clustering Heuristics for Ethereum	 Clustering Ethereum addresses based on transaction patterns such as address reuse and airdrops to analyze entities that are likely to be managing multiple accounts Approximately 18% of Ethereum addresses can be clustered, identifying more than 340,000 entities managing multiple addresses 	Grouping of addresses based on transaction patterns such as address reuse, airdrop, etc.				

(2) Research literature survey results

Table A-1-2 Results of research literature survey (2/5)

			Summary	On-chain data analysis				Off-chain
No.	Source	Document-name		Clustering	Graph Theory	Machine Learning	Other	data analysis
3	2021 IEEE International Conference on Decentralized Applications and Infrastructures	Blockchain is Watching You: Profiling and Deanonymizing Ethereum Users	 Research on how to identify users by association of Ethereum addresses using machine learning with graph theory User profiling explains superiority of node embedding method 	Research methods for identifying users by clustering addresses	Utilize graph theory (node embedding technique) for data analysis	Leveraging machine learning for data analysis		
4	30th USENIX Security Symposium	Frontrunner Jones and the Raiders of the Dark Forest: An Empirical Study of Frontrunning on the Ethereum Blockchain	 Researching methods to efficiently measure the behavior of Ethereum front-running attacks (attacks in which miners intentionally swap transactions during block generation to gain profit). Identified approximately 200,000 attack transactions, 1.5,000 attacker accounts, bots, profit amounts, etc. 	Bloom filter (probabilistic data structure) to group attacker addresses				
5	IEEE INFOCOM 2018 - IEEE Conference on Computer Communications	Understanding Ethereum via Graph Analysis	 Graph-theoretic analysis of Ethereum transaction data for an approach to security issues. Attack Forensics: Detection of malicious smart contract attacker accounts Anomaly detection: detection of accounts that create a large number of smart contracts that are not invoked De-anonymization: extract important keywords from information such as comments about nodes 		Money Flow/ Smart Contract Creation/Smart Contract Calling Analyzed by Graph Theory			

(2) Research literature survey results

Table A-1-2 Results of research literature survey (3/5)

		Document-name		On-chain data analysis				- Off-chain	
No.	Source		Summary	Clustering	Graph Theory	Machine Learning	Other	data analysis	
6	FC 2019: Financial Cryptography and Data Security	Measuring Ethereum- based ERC20 Token Networks	 Graph theory analysis of the relationship between Ethereum's top 1,000 token transfers and token owners. While the majority of token transfers are concentrated on exchanges and other venues, we found that many token holders do not move their tokens at all 		Graph theory analysis of token transfers and token holders				
7	WWW '20: Proceedings of The Web Conference 2020	Measurements, Analyses, and Insights on the Entire Ethereum Blockchain Network	 Analyze the interaction of Ethereum users, transactions, smart contracts, token transfers, etc. using graph theory to study similarities and differences with SNS and the Web. Explain that the distribution of transactions is different from that of social networking sites, etc. 		Graph theory analysis of relevance of transactions, token transfers, etc.	 [Machine Learning Algorithm] Random Forest: Algorithm in which multiple decision trees trained in parallel are asked to make predictions, and the final output is determined by majority vote or average. Support Vector Machines: Algorithms for classification and regression by determining boundaries, etc. that divide two classed 			
8	Financial Cryptography and Data Security 2023 Accepted papers	Understanding Polkadot Through Graph Analysis: Transaction Model, Network Properties, and Insights	 Model user transactions in the Polkadot blockchain and analyze them in the Transaction Action Graph Detecting the concentration of power in Binance and the reality that the majority of native tokens are occupied by 2% of users. 		Graph Theory Analysis of User Transaction Concentration	 of data groups. XGBoost: An algorithm that combines ensemble learning (a method of outputting comprehensive results using multiple methods that do not have high performance) and decision trees (a method of solving problems by conditional branching), called gradient boosting. 			
9	Web Information Systems Engineering - WISE 2019	Detecting Fraudulent Accounts on Blockchain:. A Supervised Approach	 Comparing three machine learning analysis methods for the purpose of detecting fraudulent accounts of malicious actors Random forests yielded the best results in reproducibility and false positive rate 			Comparing three methods: random forests, support vector machines, and XGBoost			

(2) Research literature survey results

Table A-1-2 Results of research literature survey (4/5)

	Source	Document-name	Summary	On-chain data analysis				- Off-chain
No.				Clustering	Graph Theory	Machine Learning	Other	data analysis
10	Expert Systems with Applications Volume 150	Detection of illicit accounts over the Ethereum Blockchain	 Detect illegal activity in transaction history using XGBoost based on approximately 2,000 addresses flagged as illegal by the Ethereum community (Etherscam DB) and normal addresses Achieved an average accuracy of 96% with 10 cross-validations 			Use XGBoost for data analysis		EtherscamDB information is tied to an Ethereum account
11	Future Generation Computer Systems Volume 102	Dissecting Ponzi schemes on Ethereum: Identification, analysis, and impact	 Investigate ponzi schemes (investment fraud) on Ethereum and analyze behavior and impact Analyzed smart contract code and transaction logs for suspected ponge scheme behavior using validation tools and identified 184 ponge schemes 				Analyze smart contract code and transaction logs to identify ponge schemes	
12	ICIS 2021 - International Conference on Information Systems	Cryptocurrency Market Manipulation: A Systematic Literature Review	 Keyword search of 7 academic databases and 3 leading journal journals for market manipulation of crypto assets Analysis identifies 7 major methods of market manipulation (Pump&Dump, money laundering, order books, stablecoin, front running, insider trading, DDOS attacks) 					Academic databases, keyword searches of leading journals to analyze trends

(2) Research literature survey results

No.	Source Docu		Summary		Off-chain			
		Document-name		Clustering	Graph Theory	Machine Learning	Other	data analysis
13	Financial Cryptography and Data Security 2023 Accepted papers	Short paper: DeFi Deception-Uncovering the prevalence of rug pulls in cryptocurrency projects	 Analyzed time to fraud execution and methods related to DeFi's take-away fraud (rug pull) and investigated fraud trends Fraud has been declining since late 2022 due to IDO (funded by DEX token issuance), NFT, and other new services since then, which have reduced take-away fraud. 					Bitcointalk (discussion forum), analysis of market site information

Table A-1-2 Results of research literature survey (5/5)