

# United States Senate

WASHINGTON, DC 20510

March 1, 2023

Changpeng Zhao  
CEO  
Binance  
c/o International Corporation Services, Ltd.  
Harbour Place, 2<sup>nd</sup> Floor North Wing  
Grand Cayman KY1-1106  
Cayman Islands

Brian Shroder  
CEO  
BAM Trading Services, Inc.  
d/b/a Binance.US  
611 Cowper Street, Suite 400  
Palo Alto, CA 94301

Mr. Zhao and Mr. Shroder:

We write to request information regarding growing concerns over the finances, risk management, and regulatory compliance of Binance, Binance.US, and other related entities.<sup>1</sup> Amid the turbulence unleashed upon the cryptocurrency (crypto) market by the swift collapse of the crypto exchange FTX,<sup>2</sup> Binance now faces investigations into criminal sanctions evasion, money laundering conspiracy, unlicensed money transmission,<sup>3</sup> questions about its financial health,<sup>4</sup> and increased scrutiny over its intentionally “opaque corporate structure.”<sup>5</sup> Despite calls for greater

---

<sup>1</sup> Reuters, “Special Report: Binance’s books are a black box, filings show, as it tries to rally confidence,” Tom Wilson, Angus Berwick, and Elizabeth Howcroft, December 19, 2022, <https://www.reuters.com/technology/binances-books-are-black-box-filings-show-crypto-giant-tries-rally-confidence-2022-12-19/>.

<sup>2</sup> Bloomberg, “Crypto’s Post-FTX Crisis Is Laid Bare as Trading Volumes Plummet by 50%,” Suvashree Ghosh and Joanna Ossinger, December 16, 2022, <https://www.bloomberg.com/news/articles/2022-12-16/crypto-s-post-ftx-crisis-is-laid-bare-as-trading-volumes-plummet-by-50#xj4y7vzkg>.

<sup>3</sup> Reuters, “Exclusive: U.S. Justice Dept is split over charging Binance as crypto world falters,” Angus Berwick, Dan Levine, and Tom Wilson, December 12, 2022, <https://www.reuters.com/markets/us/us-justice-dept-is-split-over-charging-binance-crypto-world-falters-sources-2022-12-12/>.

<sup>4</sup> CoinDesk, “With Binance, Everything Is Not Fine,” Genevieve Roch-Dechter, December 19, 2022, <https://www.coindesk.com/consensus-magazine/2022/12/19/cz-binance-crypto-exchange-red-flags-cnbc-ftx/>.

<sup>5</sup> Reuters, “Crypto giant Binance kept weak money-laundering checks even as it promised tougher compliance, documents show,” Angus Berwick and Tom Wilson, January 21, 2022, <https://www.reuters.com/investigates/special-report/finance-crypto-currency-binance/>.

transparency from customers,<sup>6</sup> financial experts,<sup>7</sup> the U.S. Congress,<sup>8</sup> and authorities around the world<sup>9</sup> – and commitments to transparency from Mr. Zhao himself – “the core of the business... remains mostly hidden from public view.”<sup>10</sup> Meanwhile, what little information about Binance’s finances is available to the public suggests that the exchange is a hotbed of illegal financial activity that has facilitated over \$10 billion in payments to criminals and sanctions evaders.<sup>11</sup>

The catastrophic collapse of FTX has only underscored the need for real transparency and accountability in the crypto industry. Binance is the world’s largest cryptocurrency exchange by volume,<sup>12</sup> with over 120 million users globally,<sup>13</sup> meaning that it is uniquely positioned to facilitate illicit financial transactions at an unparalleled scale, imperiling the savings of millions of everyday users. Retail investors are owed a full, unobstructed view of the relevant operations of the companies they entrust with their assets. Your companies’ apparent attempts at evading the enforcement of anti-money laundering laws, securities laws, information reporting requirements, and other financial regulations<sup>14</sup> cast serious doubt on the stability and legitimacy of Binance and its related entities, and on your commitment to your customers.

In the years since Binance’s founding, the company has faced increasingly disturbing allegations regarding the legality of its operations. Mr. Zhao “decline[d] to disclose the location or entity behind his own exchange,”<sup>15</sup> in what many regard as a blatant attempt to dodge the world’s

---

<sup>6</sup> CNBC, “Binance temporarily halted withdrawals of stablecoin USDC as investor concerns mount after FTX collapse,” Arjun Kharpal, December 13, 2022, <https://www.cnbc.com/2022/12/13/crypto-exchange-binance-temporarily-halts-usdc-stablecoin-withdrawals.html>.

<sup>7</sup> Wall Street Journal, “Binance Is Trying to Calm Investors, but Its Finances Remain a Mystery,” Jonathan Weil, December 10, 2022, <https://www.wsj.com/articles/binance-is-trying-to-calm-investors-but-its-finances-remain-a-mystery-11670679351>.

<sup>8</sup> Letter from Representative Raja Krishnamoorthi to Brian Shroder, August 30, 2022, <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2022-08-30.RK%20to%20Shroder-Binance%20re%20Crypto%20Fraud.pdf>; Senate Committee on Banking, Housing, and Urban Affairs, “Crypto Crash: Why the FTX Bubble Burst and the Harm to Consumers,” December 14, 2022, <https://www.banking.senate.gov/hearings/crypto-crash-why-the-ftx-bubble-burst-and-the-harm-to-consumers>.

<sup>9</sup> Reuters, “Crypto giant Binance kept weak money-laundering checks even as it promised tougher compliance, documents show,” Angus Berwick and Tom Wilson, January 21, 2022, <https://www.reuters.com/investigates/special-report/finance-crypto-currency-binance/>.

<sup>10</sup> Reuters, “Special Report: Binance’s books are a black box, filings show, as it tries to rally confidence,” Tom Wilson, Angus Berwick, and Elizabeth Howcroft, December 19, 2022, <https://www.reuters.com/technology/binances-books-are-black-box-filings-show-crypto-giant-tries-rally-confidence-2022-12-19/>.

<sup>11</sup> Reuters, “Exclusive: U.S. Justice Dept is split over charging Binance as crypto world falters,” Angus Berwick, Dan Levine and Tom Wilson, December 12, 2022, <https://www.reuters.com/markets/us/us-justice-dept-is-split-over-charging-binance-crypto-world-falters-sources-2022-12-12/>.

<sup>12</sup> Reuters, “Top crypto exchanges by volume,” Harish Sridharan and Tom Westbrook, November 9, 2022, <https://www.reuters.com/markets/currencies/top-crypto-exchanges-by-volume-2022-11-09/>.

<sup>13</sup> Binance, “A Letter from Our CEO: 5 Years of Protecting Users and Supporting the Global Digital Asset Ecosystem,” Changpeng Zhao, July 14, 2022, <https://www.binance.com/en/blog/from-cz/a-letter-from-our-ceo-5-years-of-protecting-users-and-supporting-the-global-digital-asset-ecosystem-2435011738702007817>.

<sup>14</sup> *Id.*

<sup>15</sup> Reuters, “Exclusive: U.S. Justice Dept is split over charging Binance as crypto world falters,” Angus Berwick, Dan Levine and Tom Wilson, December 12, 2022, <https://www.reuters.com/markets/us/us-justice-dept-is-split-over-charging-binance-crypto-world-falters-sources-2022-12-12/>.

financial regulators, serve “users without licenses,” and violate anti-money laundering laws.<sup>16</sup> Recent investigations revealed that your companies have implemented a series of systems specifically designed to circumvent regulatory oversight and facilitate theft, money laundering, and terrorist financing, thereby obscuring its illegal activity.<sup>17</sup> The problems revealed by these investigations included:

- **Evading U.S. regulators.** Shortly after Binance’s 2017 launch, roughly one third of its users were U.S.-based.<sup>18</sup> However, the company did not register with the U.S. Department of the Treasury (Treasury Department), as is required “of financial companies with ‘substantial’ business in the United States” by the Bank Secrecy Act.<sup>19</sup> Instead, in an attempt to “insulate” Binance from U.S. oversight, Mr. Zhao “approved a plan to set up a US-based exchange to draw US regulators’ attention away from the main platform.”<sup>20</sup> The resultant platform, Binance.US, registered with the Treasury Department and offered a limited suite of product offerings with the intention of “reduc[ing] attractiveness of enforcement” to the U.S. Securities and Exchange Commission (SEC) and other U.S. regulators.<sup>21</sup> It seems this diversion has failed – in 2020, the SEC issued Binance.US a subpoena requesting materials documenting its relationship with Binance.<sup>22</sup> Indeed, federal prosecutors have now subpoenaed U.S.-based investment firms with ties to Binance as part of their ongoing investigations into the company’s “potential violations of money-laundering rules...”<sup>23</sup> In February 2023, the New York State Department of Financial Services (NYDFS) ordered Paxos – a trust company regulated by NYDFS – to end its relationship with Binance and stop issuing BUSD, a “Binance-branded stablecoin pegged to the US dollar.”<sup>24</sup> Paxos has also received notice from the SEC of the Commission’s plans to “sue the company for violating investor protection laws” in connection with its BUSD token offering.<sup>25</sup>

---

<sup>16</sup> Reuters, “Exclusive: U.S. sought records on Binance CEO for crypto money laundering probe,” Angus Berwick and Tom Wilson, September 1, 2022, <https://www.reuters.com/technology/exclusive-us-sought-records-binance-ceo-crypto-money-laundering-probe-2022-09-01/>.

<sup>17</sup> Reuters, “Exclusive: U.S. Justice Dept is split over charging Binance as crypto world falters,” Angus Berwick, Dan Levine, and Tom Wilson, December 12, 2022, <https://www.reuters.com/markets/us/us-justice-dept-is-split-over-charging-binance-crypto-world-falters-sources-2022-12-12/>; Reuters, “How Binance CEO and aides plotted to dodge regulators in U.S. and UK,” Tom Wilson and Angus Berwick, October 17, 2022, <https://www.reuters.com/investigates/special-report/fintech-crypto-binance-zhao/>.

<sup>18</sup> Reuters, “How Binance CEO and aides plotted to dodge regulators in U.S. and UK,” Tom Wilson and Angus Berwick, October 17, 2022, <https://www.reuters.com/investigates/special-report/fintech-crypto-binance-zhao/>.

<sup>19</sup> *Id.*

<sup>20</sup> *Id.*

<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

<sup>23</sup> The Washington Post, “U.S. subpoenas hedge funds in probe of crypto exchange Binance,” Douglas MacMillan and Tory Newmyer, January 7, 2022, <https://www.washingtonpost.com/technology/2023/01/07/binance-subpoenas-crypto-trading/>.

<sup>24</sup> New York State Department of Financial Services, “Notice Regarding Paxos-Issued BUSD,” consumer alert, February 13, 2023, [https://www.dfs.ny.gov/consumers/alerts/Paxos\\_and\\_Binance](https://www.dfs.ny.gov/consumers/alerts/Paxos_and_Binance); CNN, “US regulator orders crypto firm to stop minting Binance stablecoin,” Michelle Toh, February 14, 2023, <https://www.cnn.com/2023/02/14/investing/paxos-binance-busd-halt-order-us-intl-hnk/index.html>.

<sup>25</sup> The Wall Street Journal, “Crypto Firm Paxos Faces SEC Lawsuit Over Binance USD Token,” Vicky Ge Huang, Patricia Kowsmann, and Dave Michaels, February 12, 2023, <https://www.wsj.com/articles/crypto-firm-paxos-faces-sec-lawsuit-over-binance-usd-token-8031e7a7>.

While Mr. Zhao has claimed that Binance.US is a “fully independent entity,” in reality, he controls the company as a “de facto subsidiary” of Binance.<sup>26</sup> Indeed, according to 2019 financial documents, “Binance’s Cayman Islands holding company kept custody of Binance.US customers’ digital wallets.”<sup>27</sup> New reporting has found that, over the course of three months in early 2021, over \$400 million was moved out of Binance.US’s bank account at Silvergate Bank and into an account held by “a trading firm managed by Binance CEO Changpeng Zhao...”<sup>28</sup> It is not clear whether any of those funds belong to Binance.US customers, whose dollar deposits were supposedly also held at Silvergate Bank, as well as at Prime Trust LLC, a custodian firm.<sup>29</sup> Despite claims from Binance.US that only Binance.US employees have access to the company’s bank accounts, messages obtained by *Reuters* show that Binance.US “executives were concerned by the outflows because the transfers were taking place without their knowledge...”<sup>30</sup> In truth, “the global Binance exchange, which is not licensed to operate in the United States, controlled the finances of Binance.US, despite maintaining that the American entity is entirely independent and operates as its ‘US partner.’”<sup>31</sup> *Reuters* found that Binance’s finance executive had access to Binance.US’s account with Silvergate Bank.<sup>32</sup>

Mr. Zhao’s assertion that Binance.US is fully independent is eerily similar to claims Sam Bankman-Fried made regarding the distinction between FTX US and FTX<sup>33</sup> – claims that appear to be false, given that FTX US has filed for bankruptcy, its users have lost access to their funds, and its new CEO has declared that it is, in fact, insolvent.<sup>34</sup> With this scheme in place, and in pursuit of profits, Binance has intentionally allowed U.S.-based users to illegally access and trade unregulated products on the main exchange.<sup>35</sup> According to *Reuters*, “a senior [Binance] employee told a colleague in a message that the compliance department had privately told them that the exchange was, in practice, not banning U.S. users.”<sup>36</sup>

---

<sup>26</sup> *Reuters*, “How Binance CEO and aides plotted to dodge regulators in U.S. and UK,” Tom Wilson and Angus Berwick, October 17, 2022, <https://www.reuters.com/investigates/special-report/fintech-crypto-binance-zhao/>.

<sup>27</sup> *Id.*

<sup>28</sup> *Reuters*, “Exclusive: Crypto giant moved \$400 million from U.S. partner to firm managed by CEO Zhao,” Angus Berwick and Tom Wilson, February 16, 2021, <https://www.reuters.com/technology/crypto-giant-binance-moved-400-million-us-partner-firm-managed-by-ceo-zhao-2023-02-16/>.

<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

<sup>31</sup> *Id.*

<sup>32</sup> *Id.*

<sup>33</sup> New York Times, “Transcript of Sam Bankman-Fried’s Interview at the DealBook Summit,” December 1, 2022, <https://www.nytimes.com/2022/12/01/business/dealbook/sam-bankman-fried-dealbook-interview-transcript.html>.

<sup>34</sup> The Wall Street Journal, “FTX CEO Details Mismanagement, Says U.S. Customer Funds Could Be at Risk,” Alexander Saeedy and Paul Kiernan, December 13, 2022, <https://www.wsj.com/articles/new-ftx-chief-to-testify-before-congress-after-sam-bankman-fried-arrest-11670903625>; Fortune, “Sam Bankman-Fried doesn’t want you to see old tweets about Tom Brady and about FTX being solvent” ‘We don’t invest client assets,’” Tristan Bove, November 16, 2022, <https://fortune.com/crypto/2022/11/16/sam-bankman-fried-deleted-tweets-tom-brady-ftx-solvency-intent-sbf-cz/>.

<sup>35</sup> *Reuters*, “How Binance CEO and aides plotted to dodge regulators in U.S. and UK,” Tom Wilson and Angus Berwick, October 17, 2022, <https://www.reuters.com/investigates/special-report/fintech-crypto-binance-zhao/>.

<sup>36</sup> *Id.*

- **Facilitating money laundering and sanctions evasion.** In the few years since its founding, Binance has laundered billions in crypto, moving at least \$10 billion to criminals and sanctions evaders.<sup>37</sup> This is no accident. It appears that money laundering is central to Binance’s business strategy – so much so that Mr. Zhao himself has directed his so-called ‘compliance’ team to substantially weaken the platform’s anti-money laundering controls, or do away with them completely.<sup>38</sup> Binance staff, including its Chief Compliance Officer and former Global Money Laundering Reporting Officer, expressed concern about the company’s “weak” know-your-customer (KYC) checks.<sup>39</sup> Mr. Zhao ignored these worries.<sup>40</sup> In fact, the company’s Chief Compliance Officer advised colleagues that Mr. Zhao wanted “no kyc,” and for “users to be able to trade within 10 minutes of signing up,” presumably bypassing the collection of identifying information.<sup>41</sup> In messages sent via encrypted messaging service Telegram, the Chief Compliance Officer wrote, “Reduce KYC. Raise Limits. BEST COMBO.”<sup>42</sup> Binance.US was also in on the scheme: “Almost half the U.S. compliance team quit by mid-2022 after a new U.S. boss was appointed by Zhao,... because the new chief pushed them to register users so swiftly that they couldn’t conduct proper money laundering checks.”<sup>43</sup> Binance.US executives reportedly directed compliance personnel to “apply more lenient checks” to “VIP customers” who had been referred to the platform to increase its liquidity.<sup>44</sup> As *Reuters* reports, “[t]he new set-up compromised the Binance.US compliance officers’ duty to assess users for possible criminal activity... as they were under pressure to not turn customers away. The compliance team also struggled to obtain customer data and documentation on Binance.US’s anti-money laundering policies.”<sup>45</sup>

Binance’s business strategy appears to depend, at least in part, on the maintenance of a laughably weak anti-money laundering compliance program. A *Reuters* investigation revealed that, “[u]ntil August 2021 the main Binance exchange let users open accounts and trade crypto anonymously by merely providing an email address.”<sup>46</sup> This policy allowed Binance to illegally onboard – and profit off of – U.S.-based users. But the company’s deliberately poor compliance program has had broader, more devastating consequences for crypto consumers and for the broader public. According to *Reuters*,

---

<sup>37</sup> Reuters, “Exclusive: U.S. Justice Dept is split over charging Binance as crypto world falters,” Angus Berwick, Dan Levine and Tom Wilson, December 12, 2022, <https://www.reuters.com/markets/us/us-justice-dept-is-split-over-charging-binance-crypto-world-falters-sources-2022-12-12/>.

<sup>38</sup> Reuters, “Special Report-Crypto giant Binance kept weak money-laundering checks even as it promised tougher compliance,” Angus Berwick and Tom Wilson, January 21, 2022, <https://www.reuters.com/article/finance-cryptocurrency-binance/special-report-crypto-giant-binance-kept-weak-money-laundering-checks-even-as-it-promised-tougher-compliance-documents-show-idUSL8N2U065F>.

<sup>39</sup> *Id.*

<sup>40</sup> *Id.*

<sup>41</sup> *Id.*

<sup>42</sup> *Id.*

<sup>43</sup> Reuters, “How Binance CEO and aides plotted to dodge regulators in U.S. and UK,” Tom Wilson and Angus Berwick, October 17, 2022, <https://www.reuters.com/investigates/special-report/fintech-crypto-binance-zhao/>.

<sup>44</sup> *Id.*

<sup>45</sup> *Id.*

<sup>46</sup> Reuters, “How Binance CEO and aides plotted to dodge regulators in U.S. and UK,” Tom Wilson and Angus Berwick, October 17, 2022, <https://www.reuters.com/investigates/special-report/fintech-crypto-binance-zhao/>.

Binance has facilitated transactions for Iranian firms “with a value of [at least] \$8 billion,” in spite of U.S. sanctions designed to prevent such transactions.<sup>47</sup> Your company “acted against its own compliance department’s assessment by continuing to recruit customers in seven countries, including Russia and Ukraine, judged to be of ‘extreme’ money laundering risk...”<sup>48</sup> German authorities have tied Binance transactions to a multi-million euro fraud scheme and a fatal gun attack.<sup>49</sup> Since 2018, Binance has been under a Department of Justice investigation for money laundering conspiracy and criminal sanctions violations, in addition to unlicensed money transmission.<sup>50</sup>

- **Lack of transparency.** Given these disturbing reports, it is unsurprising that Binance has gone to great lengths to hide even its most basic financial information. The FTX collapse, understandably, renewed calls for transparency from within the crypto community and beyond.<sup>51</sup> Despite Mr. Zhao’s promise to “lead by example” and enhance Binance’s transparency, the company remains a “black box.”<sup>52</sup> As *Reuters* reporting demonstrates, “Binance declines to say where Binance.com is based. It doesn’t disclose basic financial information such as revenue, profit and cash reserves. The company has its own crypto coin, but doesn’t reveal what role it plays on its balance sheet. It lends customers money against their crypto assets and lets them trade on margin, with borrowed funds. But it doesn’t detail how big those bets are, how exposed Binance is to that risk, or the full extent of its reserves to finance withdrawals.”<sup>53</sup> There are few jurisdictions in which even subunits of Binance’s operation operate with “regulatory licenses, registrations, [authorizations] and approvals” – even there, vanishingly little information has been disclosed to financial regulators, and “several of those units appear to have little activity.”<sup>54</sup>

---

<sup>47</sup> Reuters, “Crypto exchange Binance helped Iranian firms trade \$8 billion despite sanctions,” Angus Berwick and Tom Wilson, November 7, 2022, <https://www.reuters.com/business/finance/exclusive-crypto-exchange-binance-helped-iranian-firms-trade-8-billion-despite-2022-11-04/>.

<sup>48</sup> Reuters, “Special Report-Crypto giant Binance kept weak money-laundering checks even as it promised tougher compliance,” Angus Berwick and Tom Wilson, January 21, 2022, <https://www.reuters.com/article/finance-cryptocurrency-binance/special-report-crypto-giant-binance-kept-weak-money-laundering-checks-even-as-it-promised-tougher-compliance-documents-show-idUSL8N2U065F>.

<sup>49</sup> *Id.*

<sup>50</sup> Reuters, “Exclusive: U.S. Justice Dept is split over charging Binance as crypto world falters,” Angus Berwick, Dan Levine and Tom Wilson, December 12, 2022, <https://www.reuters.com/markets/us/us-justice-dept-is-split-over-charging-binance-crypto-world-falters-sources-2022-12-12/>.

<sup>51</sup> CNBC, “Binance temporarily halted withdrawals of stablecoin USDC as investor concerns mount after FTX collapse,” Arjun Kharpal, December 13, 2022, <https://www.cnbc.com/2022/12/13/crypto-exchange-binance-temporarily-halts-usdc-stablecoin-withdrawals.html>.

<sup>52</sup> Reuters, “Special Report: Binance’s books are a black box, filings show, as it tries to rally confidence,” Tom Wilson, Angus Berwick, and Elizabeth Howcroft, December 19, 2022, <https://www.reuters.com/technology/binances-books-are-black-box-filings-show-crypto-giant-tries-rally-confidence-2022-12-19/>.

<sup>53</sup> *Id.*

<sup>54</sup> Reuters, “Special Report: Binance’s books are a black box, filings show, as it tries to rally confidence,” Tom Wilson, Angus Berwick, and Elizabeth Howcroft, December 19, 2022, <https://www.reuters.com/technology/binances-books-are-black-box-filings-show-crypto-giant-tries-rally-confidence-2022-12-19/>

In November, Binance hired French auditing firm Mazars to “perform a so-called proof-of-reserves check on its bitcoin holdings.”<sup>55</sup> Mazars completed its report – notably much narrower than a full financial audit – which included the finding that Binance’s reserves had been over-collateralized on at least one day in late November.<sup>56</sup> However, shortly after publishing its report, Mazars “deleted the webpage containing the report” and “paused its activity relating to the provision of Proof of Reserves Reports for entities in the cryptocurrency sector due to concerns regarding the way these reports are understood by the public.”<sup>57</sup> You have yet to provide the public with the kind of financial information that could confirm for investors that your businesses are sound and retail investors’ funds are safe.

Binance and its related entities have purposefully evaded regulators, moved assets to criminals and sanctions evaders, and hidden basic financial information from its customers and the public. Your actions have called into question the legitimacy of your business and the safety of your customers’ assets and raised concerns about the potential impact of these activities on the stability of the crypto market and the broader financial system. We therefore request that you provide the requested documents and answers to the following questions no later than March 16, 2023:

1. Please provide complete copies of all Binance and Binance subsidiary balance sheets from 2017 to the present.
2. Please provide an estimate of the number and percentage of U.S.-based Binance users during every fiscal quarter between 2017 and the present.
3. Reports suggest that Mr. Zhao approved a 2018 plan to create a company, then called the “Tai Chi entity,” that would “distract regulators with feigned interest in compliance...”<sup>58</sup>
  - a. Please provide any and all documents and communications relating to this plan, including its inception, development, and implementation.
4. Please provide complete copies of all internal anti-money laundering (AML) and countering financing of terrorism (CFT) and know-your-customer (KYC) policies and procedures used by Binance, Binance subsidiaries, and Binance.US, as well as communications relating to AML/CFT policies and procedures.
5. *Reuters* reported that Mr. Zhao told Binance compliance personnel that he wanted “no kyc.”<sup>59</sup> Has Mr. Zhao, at any time, directed or suggested to Binance and/or Binance.US

---

<sup>55</sup> Reuters, “Auditing firm Mazars pauses work for crypto clients,” Mehnaz Yasmin and Tom Wilson, December 16, 2022, <https://www.reuters.com/technology/auditing-firm-mazars-pauses-work-binance-other-crypto-clients-coindesk-2022-12-16/>.

<sup>56</sup> *Id.*

<sup>57</sup> *Id.*

<sup>58</sup> Forbes, “Leaked ‘Tai Chi’ Document Reveals Binance’s Elaborate Scheme To Evade Bitcoin Regulators,” Michael del Castillo, October 29, 2020, <https://www.forbes.com/sites/michaeldelcastillo/2020/10/29/leaked-tai-chi-document-reveals-binances-elaborate-scheme-to-evade-bitcoin-regulators/?sh=4bbc13d92a92>.

<sup>59</sup> Reuters, “Special Report-Crypto giant Binance kept weak money-laundering checks even as it promised tougher compliance,” Angus Berwick and Tom Wilson, January 21, 2022, <https://www.reuters.com/article/finance-crypto->

employees that the company should eliminate or limit know-your-customer checks or otherwise weaken its anti-money laundering compliance program? If so, please provide any and all such communications.

6. Please provide complete copies of all written policies and/or procedures regarding the relationship between Binance and Binance.US. If any such policies and/or procedures were made known to investors, please provide copies of those communications.
7. Please provide a complete list of any and all U.S.-based platforms that have, at any point, utilized Binance.com for trading services, lending services, or any other products or services.

Thank you for your attention to this matter.

Sincerely,



---

Elizabeth Warren  
United States Senator



---

Chris Van Hollen  
United States Senator



---

Roger Marshall, M.D.  
United States Senator

cc:

The Honorable Gary Gensler, Chair, U.S. Securities and Exchange Commission  
The Honorable Rostin Behnam, Chairman, Commodity Futures Trading Commission  
The Honorable Merrick B. Garland, Attorney General, U.S. Department of Justice

---

[currency-binance/special-report-crypto-giant-binance-kept-weak-money-laundering-checks-even-as-it-promised-tougher-compliance-documents-show-idUSL8N2U065F](https://www.sec.gov/spotlight/currency-binance/special-report-crypto-giant-binance-kept-weak-money-laundering-checks-even-as-it-promised-tougher-compliance-documents-show-idUSL8N2U065F).