

# Exhibit 'A'



Data Credibility in Cryptocurrency Investigations

# The Black Box Approach

Black box analytics hinder investigations and impair testimony

**UNVERIFIED  
SOURCES**



**CANNOT BE  
USED IN A  
COURT OF  
LAW**

# How attribution data can be collected

## CREDIBLE ANALYTICS



### VERIFIED OPEN

Active Live Accounts  
Dark Market / Deep Web  
Full Blockchain Nodes



### ACTIVE

Hunting and Targeting  
Malware Analysis  
Honey Pots



### PRIVATE

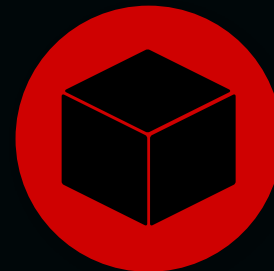
Verified User Feedback  
Private Threat Intelligence  
APWG eCrime Exchange  
Stolen Cryptocurrencies  
Fraudulent ICOs

## OTHER ANALYTICS



### UNVERIFIED OPEN

Unverified databases and  
open forums



### BLACK BOX

Potentially unauthorized  
customer data, unverified  
user feedback, clustering  
errors and false positives

## Importance of model validation

- Customers of a blockchain analytics provider may not know they are using a **Black Box** model.
- Model validation verifies the **accuracy** of the data enrichment and checks the **performance** of the model.
  - Providers should have well documented, auditable processes for attribution and clustering.
  - Providers should assess ongoing and historical attribution and clustering activity.



## SEPARATED CLUSTERS

### PROS

- ✓ High fidelity
- ✓ True to blockchain
- ✓ Easily verify attribution

### CONS

- ✗ Separate clusters won't group together visually



## SINGLE ENTITY CLUSTER

### PROS

- ✓ Quick, high-level overview

### CONS

- ✗ Not verifiable
- ✗ All data is lumped together
- ✗ Higher probability of false positives and errors



# Separated Cluster Example: Al Qassam Brigades

Case 1:20-cv-02227 Document 1 Filed 08/13/20 Page 1 of 52

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
FIFTY-THREE VIRTUAL CURRENCY  
ACCOUNTS,  
ONE HUNDRED TWENTY-SEVEN  
VIRTUAL CURRENCY PROPERTIES,  
FIVE ACCOUNTS HELD AT  
FINANCIAL INSTITUTION I,  
THE ALQASSAM.NET DOMAIN,  
THE ALQASSAM.PS DOMAIN,  
-- and --  
THE QASSAM.PS DOMAIN  
Defendants.

Civil Action No. 20-cv-2227

**UNITED STATES' VERIFIED COMPLAINT FOR FORFEITURE *IN REM***

COMES NOW, Plaintiff the United States of America, by and through the United States Attorney for the District of Columbia, and brings this Verified Complaint for Forfeiture *In Rem* against the defendant properties, namely: fifty-three virtual currency accounts (**Defendant Properties 1, 2, 3, 131 through 180**), one hundred and twenty-seven virtual currency properties (**Defendant Properties 4 through 130**), five accounts held at Financial Institution I (**Defendant Properties 181 through 185**), the alqassam.net domain (**Defendant Property 186**), the alqassam.ps domain (**Defendant Property 187**), and the qassam.ps domain (**Defendant Property**



3LhP8JYJ77cj2eVXBasY92Z6omTyRbUdbh

17QAWGVpFV4gZ25NQug46e5mBho4uDP6MD

## Separated Cluster Example: Al Qassam Brigades

CLUSTER ID	OWNER	TYPE	COUNTRY	ADDRESSES COUNT
32c1c723	AL-QASSAMBRIGADES	CRIMINAL	PALESTINIAN TERRITORY	156
ASSET	RISK	ADDRESS	BALANCE	TX RECEIVED
BTC	10	3HHhgrJf8qg8MDMtJEowYk3...	0.00000000	1
BTC	10	3G468TT13FxEdhL45wrnqRp...	0.00000000	1
BTC	10	3G5ezFPg7tfJanEapnpQJeZ7J...	0.00000000	5
BTC	10	3G3Kt3c9KutTitpSpc2pZoMr...	0.00000000	1
BTC	10	3i1UH4sRXJt9F8MnnpVY1HAX...	0.00000000	1
BTC	10	3GQk47pSNGfWBLWKJLzFQ...	0.00000000	1
BTC	10	3GJgyDVYjxk3WDaiom7148S...	0.00000000	1
BTC	10	3GPgT8dT7ZknMDhceK2Wx...	0.00000000	1

3LhP8JYJ77cj2eVXBasY92Z6omTyRbUdbh

CLUSTER ID	OWNER	TYPE	COUNTRY	ADDRESSES COUNT
1c5e355e	AL-QASSAMBRIGADES	CRIMINAL	PALESTINIAN TERRITORY	8
ASSET	RISK	ADDRESS	BALANCE	TX RECEIVED
BTC	10	1AW9z69zW2Wpg5i2gFs9Yzk...	0.00000000	1
BTC	10	14S3GUHsqSY2am6yCPqEhb7...	0.00000000	1
BTC	10	1EQFWyM1gTus8cnuwHQErna...	0.00000000	1
BTC	10	19ncZQTCBfW5bsM7v3Pe7t...	0.00000000	1
BTC	10	17QAWGVpFV4gZ25NQug46e...	0.00542293	62
BTC	10	14dRMzjmatz7zk7iRYaitMvw...	0.00000000	1
BTC	10	14EwXyqiB3yVLDJ1zVNevvED...	0.00009990	3
BTC	10	1JJQceg2YZuCsJxUvAAVwU2...	0.00000000	1

17QAWGVpFV4gZ25NQug46e5mBho4uDP6MD

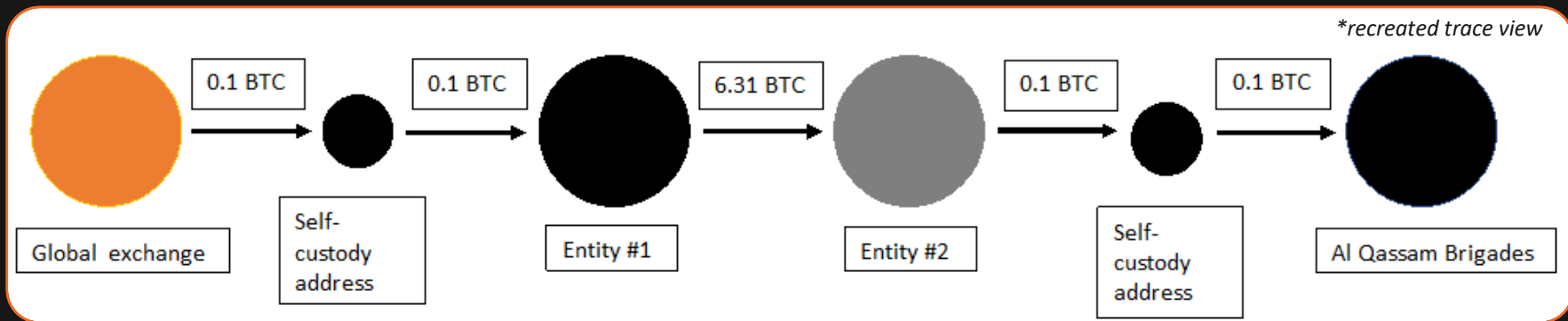




# Single Entity Tracing

**A *Global exchange* was contacted by a blockchain analytics firm (utilizing wallet-based tracing tools) who informed them that they had a customer send a very small BTC donation to al Qassam Brigades.**

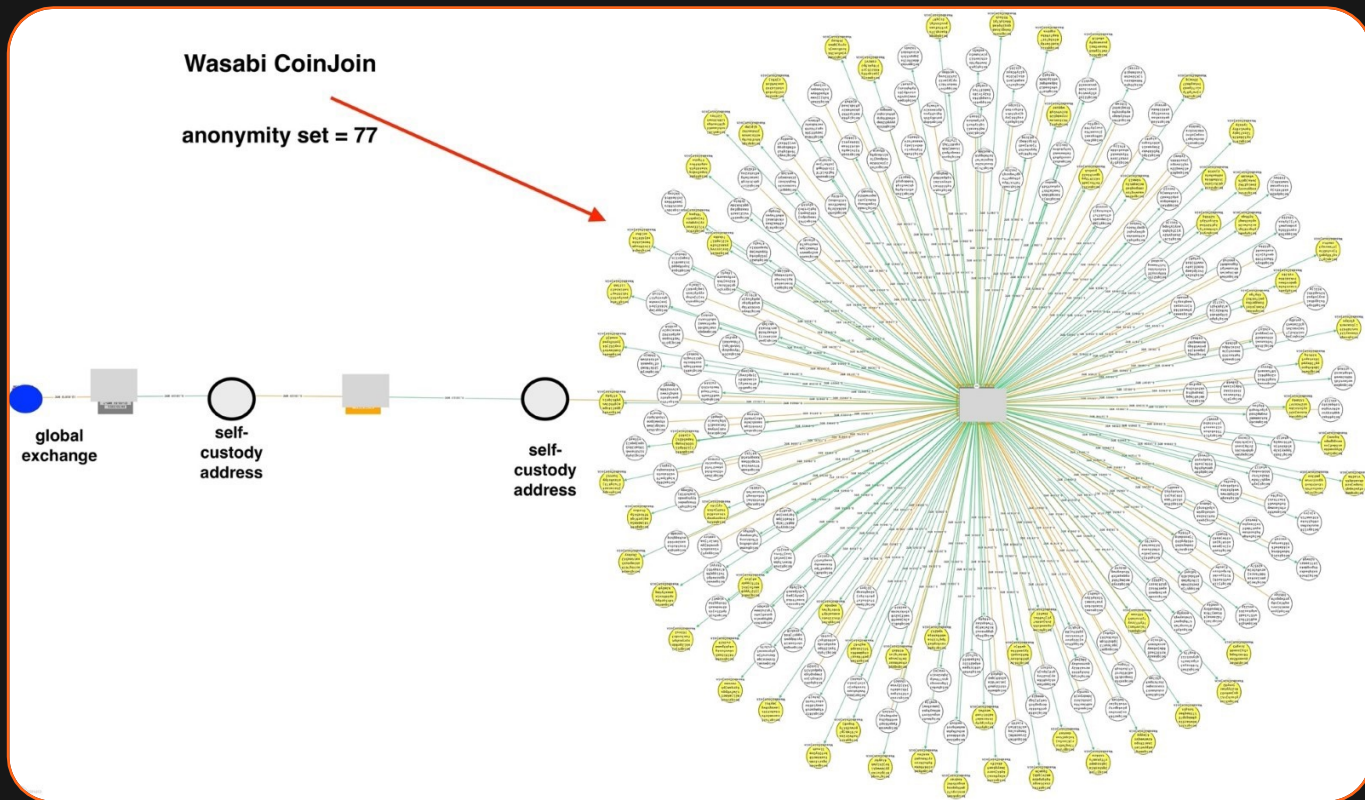
***Global exchange* approached CipherTrace to verify the trace:**



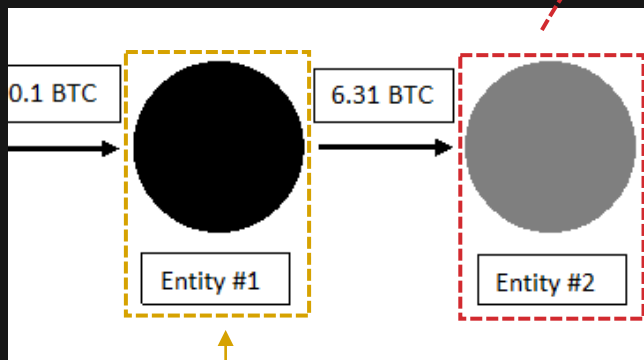


# Single Entity Tracing

What the on-chain trace actually looks like.



# Single Entity Tracing



Wasabi CoinJoin

ADDRESS: BITCOIN (BTC) **bc1qr** CURRENT BALANCE 0.00000000 BTC

RISK 10 OWNER WASABICOINJOIN TYPE MIXER CLUSTER 434cd

RECEIVED 0.20994056 BTC 1 Transactions SENT 0.20994056 BTC 1 Transactions

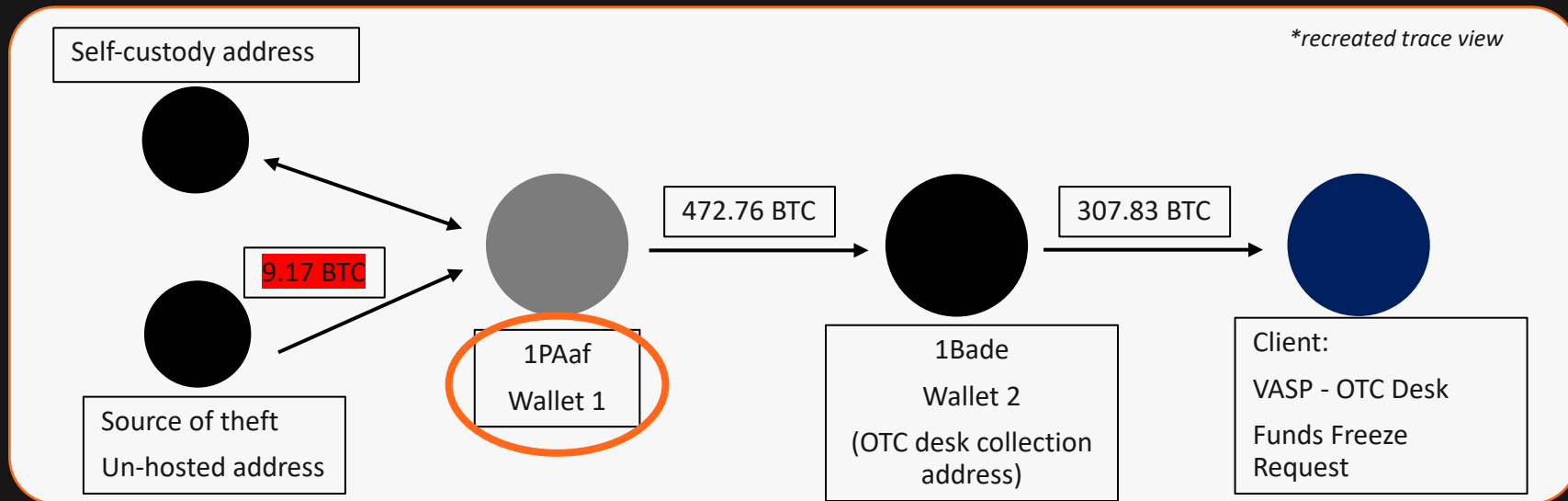
FILTER TRANSACTION ALL ADDRESSES DATE RANGE FILTER 1/3/2009 8/25/2022 Viewing page

RISK	DATE/TIME	TOTAL AMT	ADDR AMT	TRANSACTION ID	RECEIVED	SENT
	JUN 4, 2021 04:54:00 AM	25.12324428	0.20994056	75cd		
10			0.77232184			bc1qx
9			0.19278732			bc1qx
9			0.09654878			bc1qc
9			0.08452767			bc1qq
9			0.19308046			bc1qk
9			0.09654878			bc1q4
9			0.09654878			bc1qh
10			0.09300450			bc1ql2



# Artificial Clustering w/ Cluster Based Tracing

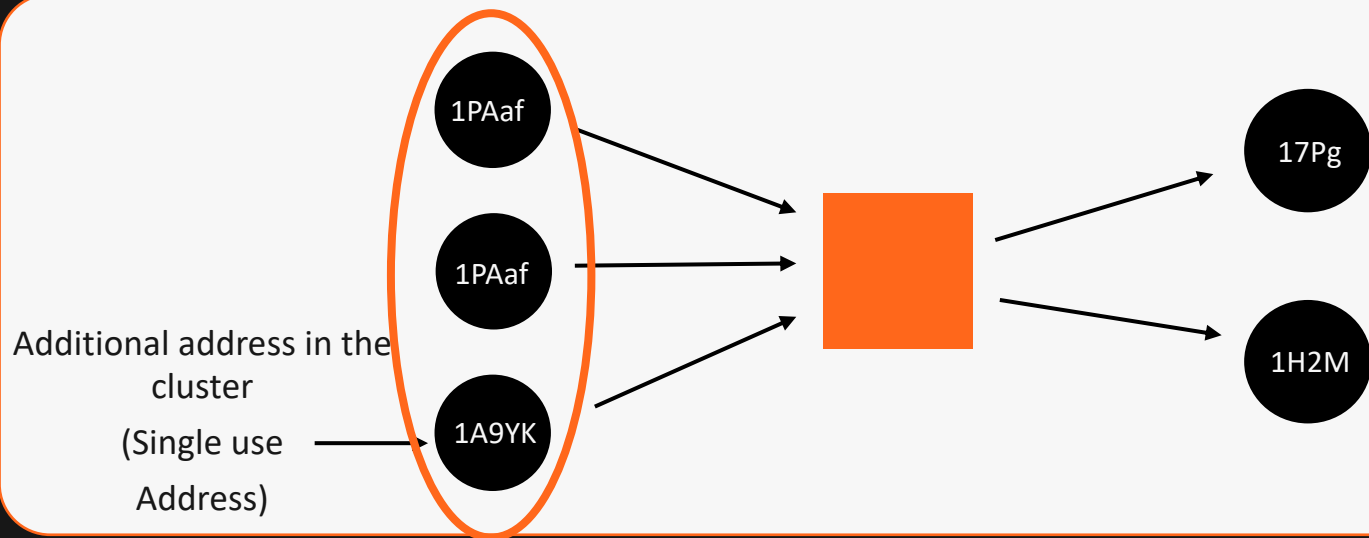
CipherTrace was asked to verify the following trace:



## Destination Output 1PAaf

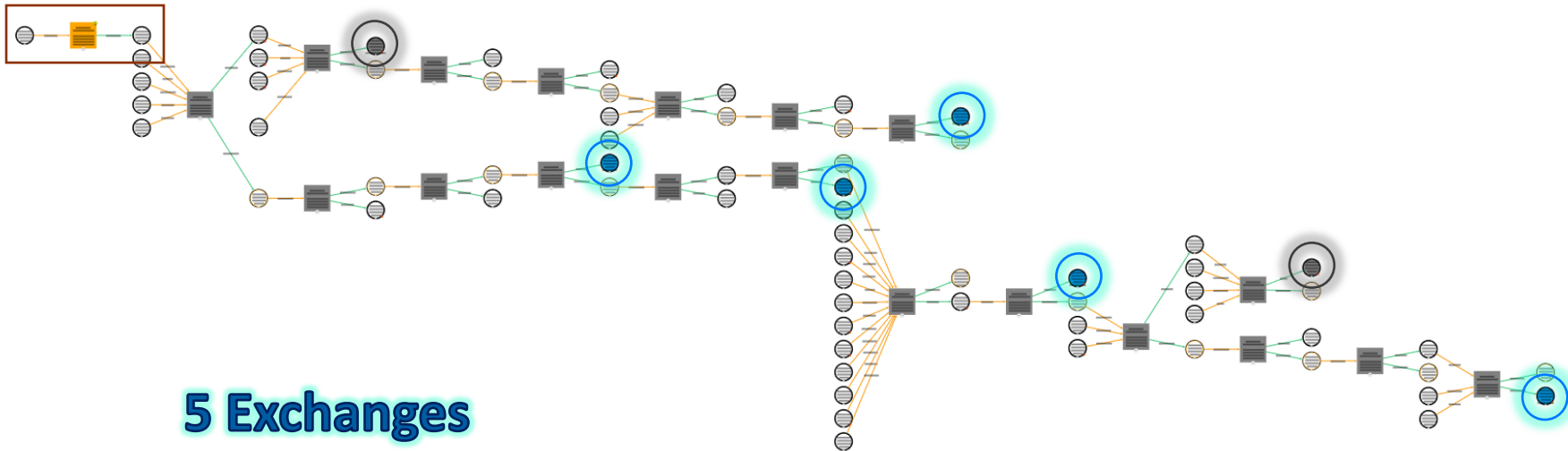
Address	1PAafXXXXXXXXXXXXXXXXXXXXXXXXXXXX
Transactions	3
Total Received	0.79950000 BTC
Total Sent	0.79950000 BTC
Final Balance	0.00000000 BTC

1PAafk	0.40040000 BTC	17PgF	0.00391625 BTC
1PAafk	0.39910000 BTC	1H2M	1.19500000 BTC
1A9YK	0.39960000 BTC		



# Artificial Clustering w/ Cluster Based Tracing

9.17 BTC Transaction

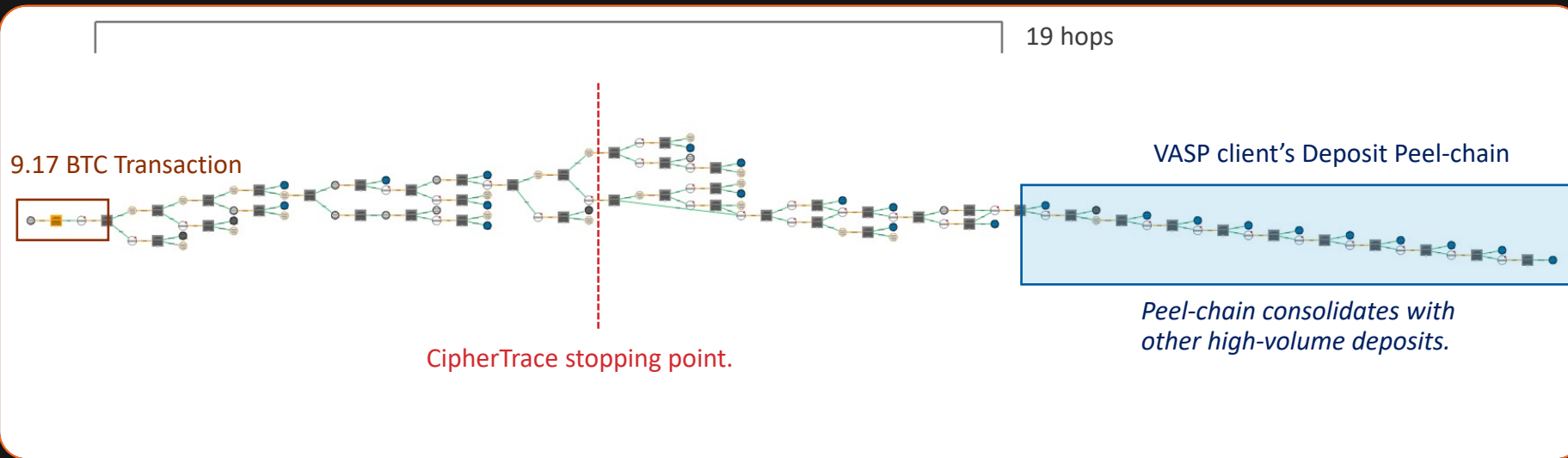


**5 Exchanges**

2 Services



# Artificial Clustering w/ Cluster Based Tracing





# Clustering False Positives

- There are known false positives that exist for clustering heuristics, which require investigators to look at and rely on other data points to confirm clustering.
- Important to not just cluster addresses and never look back at them
- Most common example of technique used to break clustering heuristics is coinjoins.

