CRYPTO WEALTH ONBOARDING

Crypto Wealth: What Should You Ask For?

An essential compliance guide to collecting the right information when onboarding crypto HNWIs.

Relationship Managers | Financial Crime Teams | Compliance Officers

In this guide

A question that comes up regularly for compliance teams onboarding crypto HNWIs is: **what information should we ask the client to provide?**

Getting this right at the outset helps establish how the wealth was generated, reduces unnecessary back-and-forth, and makes the onboarding process considerably smoother. This guide sets out what to collect, how to collect it, and what to expect from the resulting analysis.

Start with the story	Draw out how the wealth was made before asking for documents.
Ask the right questions	Match each request to the client's wealth journey.
Consider data collection	When and why to escalate to alternative data collection methods.
Verify & review	Best practices on wallet ownership and how to spot potential risks.

THE NARRATIVE

Start with the story.

The narrative comes first. Most crypto HNWIs are eager to explain how they made their money. The relationship manager's role is to obtain a clear account of that journey before requesting detailed documentation.

Some stories sound extraordinary. That does not make them high-risk.

$16m

A student holding $16 million in a wallet was an early investor in SHIB, investing less than $5,000. He retained the records.

2014

A tradesman with $8m in BTC. He was paid in bitcoin for a job he completed in early 2014 and kept the evidence.

Key items to establish from the first conversation

Entry point
When and how did you first acquire crypto? How was the investment funded?

Platforms
Which exchanges or other services were used to buy, trade or liquidate?

Wealth creation
Which assets, investments or strategies generated the largest gains, and when?

Custody
Which self-custody wallets were used, including historical wallets?

Trading activity
Active trading, derivatives or leverage? Staking, DeFi or other activity?

Liquidation
When, where and how were gains realised and converted into fiat or other assets?

→ Building a questionnaire? See Hoptrail's **model questions on page 7**.

COVER THE BASICS

The first conversation does not need every transaction detail. It needs the key events, timelines and sources of wealth, so that the evidence requests that follow can be targeted.

THE EVIDENCE

Match the questions to the story.

No two crypto wealth journeys are the same. A bitcoin miner, an early ICO investor and a high-frequency trader leave very different records. The evidence request should follow the narrative, and where possible, avoid a rigid, one-size-fits-all questionnaire.

Evidence to request:

Bitcoin miner

Mining pool details, reward records and payout wallet addresses.

ICO or early-stage investor

Token purchase agreements, contribution wallets and allocation confirmations.

Founder or employee

Employment or investment agreements, plus information on token vesting schedules and receiving wallets.

High-frequency trader

Trading strategy. Does it stack up? For very high volume cases, consider gathering data via CSV or read-only API.

Long-term holder

Self-custody wallet addresses and evidence of original purchases.

Defunct platforms

Archived emails, trade confirmations, account statements or bankruptcy claim records.

Bank statements documenting the original investment funds and later fiat withdrawals may also be required.

A list of addresses is not proof of control.
Clients should list every wallet they have owned or controlled, including inactive ones. Where wallets are material, banks should verify control independently. See page 5.

Missing records are not a barrier.

Defunct exchanges, lost wallets and unavailable records are a common feature of crypto wealth reviews, particularly for long-term holders. The advantage of blockchain data is that it can often be used to reconstruct historical fund movements, establish timelines and corroborate a client's account, even where gaps remain in the underlying records.

ENHANCED DATA COLLECTION

Consider exchange APIs to simplify collection.

Wallet addresses will show funds entering and leaving an exchange. They cannot show what happened inside the exchange account. For traders whose wealth derives partly or wholly from exchange trading, that gap matters. For compliance teams assessing financial crime risks beyond the blockchain, access to exchange data helps close potential blind spots.

API connections are a clean, safe and comprehensive way to obtain that data and connect it to the prospect's wider activity.

ON-CHAIN ANALYSIS ALONE

Deposits in | Withdrawals out

Inside the account: not visible

WITH EXCHANGE DATA

Deposits in | Withdrawals out

- Spot & futures
- All deposits & withdrawals
- Balances
- Profit & Loss

The benefits of exchange API connections

Comprehensive data capture
Every data point, in one pull.

Primary evidence base
Records straight from the exchange.

Reduces back and forth
Fewer document requests and follow-ups.

Enhanced risk assessment
A 360-degree view of financial crime risk.

THE ANALYSIS

What happens once the data is collected.

The initial request is the starting point. Hoptrail combines the client's disclosures with on-chain and exchange-level analysis to establish three things.

1

Wealth creation
Where, when and how the wealth was generated, tied to identifiable transactions and trades.

2

Financial crime exposure
Links to sanctioned entities, illicit services or other high-risk counterparties.

3

Unresolved gaps
Missing records, unexplained transfers or inconsistencies that need further examination.

REGULATORY BEST PRACTICE

Verifying wallet control.

A list of cryptocurrency addresses does not, by itself, establish that a client owns or controls the associated wallets. Where a wallet is material to a source of wealth assessment, banks should seek independent evidence of control. Verification of self-custody wallet ownership or control is increasingly recognised as regulatory best practice and forms an important part of a robust crypto onboarding process.

EBA FINMA MAS

Regulatory guidance, including from the European Banking Authority, Switzerland's FINMA and the Monetary Authority of Singapore (MAS), recognises the importance of verifying ownership or control of self-custody wallets as part of a risk-based approach to crypto transactions.

Two established methods

Cryptographic verification

Prospect wallet → Signed message → Bank verifies

The prospect signs a specific message using the private key associated with their wallet, demonstrating control without transferring any funds.

Test transaction (Satoshi test)

Prospect wallet → Small, pre-agreed amount → Designated wallet

The prospect sends a small, pre-agreed amount from the relevant address to a designated wallet, providing independently verifiable evidence of control.

Where verification is impractical

For historical or inaccessible wallets, assess alternative supporting evidence and document any limitations clearly. Proof of control only establishes control of the address *at that point in time*. Verification should therefore be read alongside transaction histories, exchange records, and the wider wealth narrative.

References: EBA Guidelines on the Travel Rule (EBA/GL/2024/11); FINMA Guidance 02/2019; MAS Notice PSN02. Never request private keys or recovery phrases.

RISK INDICATORS

Red flags are not the same as missing records.

The initial interview can highlight areas that need closer scrutiny. Here are some potential scenarios to watch out for - both during the initial interview and in subsequent analysis.

Material inconsistencies

Timelines, amounts or trading activity that do not align with the available information.

Unexplained wealth creation

Significant gains or inflows the client cannot reasonably account for.

Vague explanations

No substantive detail on assets, venues or trading strategy.

Unwillingness to cooperate

Persistent reluctance to share available information or answer reasonable questions.

These indicators prompt further examination, not automatic rejection. Struggling to recall trades and wallets from 2014, or to produce records from a defunct exchange, is not suspicious in itself. **How the client engages is more telling** than whether every record survives.

POSITIVE SIGNALS

- ✓ Proactive in explaining how the wealth was made
- ✓ Helps piece together uncertain parts of the story
- ✓ Full, consistent answers that hold up to checking

Managing expectations

Even well-documented cases generate follow-up questions. Set this expectation with the client early. Hoptrail keeps each request targeted, so the bank gets the evidence it needs without unnecessary demands on the client.

Not every transaction will be documented, and not every gap can be closed. The aim is enough of the right evidence to verify the wealth story, identify material risk and give compliance a clear, defensible basis for its decision.

Model questions for crypto onboarding.

Here are some model onboarding questions for banks to adapt into their own onboarding questionnaires. The questions draw out the wealth story first, then the evidence that supports it.

The wealth story

- Describe, in your own words, how you acquired, grew and realised your cryptocurrency wealth.
- When did you first acquire cryptocurrency, which asset was it, and how was the purchase funded?
- Which assets, investments or strategies generated your largest gains, and approximately when?
- Did you trade actively, use derivatives or leverage, or take part in mining, staking or DeFi?

Wallets

- List the public addresses of all wallets you have owned or controlled, on every blockchain, including inactive ones.
- Which wallets do you still control? Can you verify control by signing a message or sending a small test transaction?
- Are there wallets you can no longer access? If so, what happened to them?

Exchanges and liquidation

- Which exchanges, brokers or other platforms have you used, including any that have since closed?
- For accounts you can still access, can you provide read-only API access or CSV exports?
- When, where and how did you convert crypto into fiat or other assets, and which bank accounts received the proceeds?

Supporting evidence

- Do you hold token purchase agreements, ICO allocation confirmations or vesting agreements?
- If you mined, which pools did you use, and do you hold reward or payout records?
- If you used platforms that no longer operate, do you retain emails, confirmations or statements?
- Is any part of your history no longer documented? Please explain what is missing and why.

Keep it flexible
Let the narrative lead. Add the follow-ups each client's story calls for.

Gaps are not red flags
Missing records are common. Engagement and consistency matter more.

Never ask for keys
Private keys and recovery phrases must never be requested.

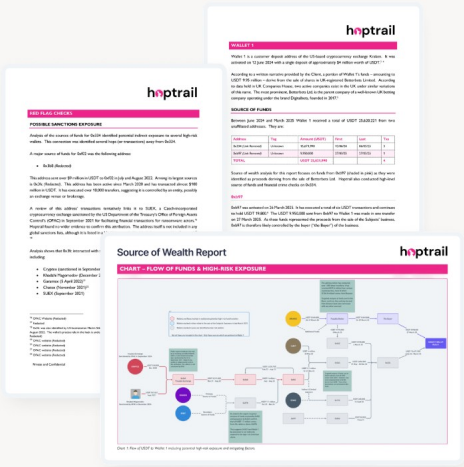
WHY HOPTRAIL

Built for wealth, not wallet screening.

Traditional screening tools score transactions and addresses for risk. Hoptrail is built to verify where a client's wealth came from - tailored for HNWI onboarding.

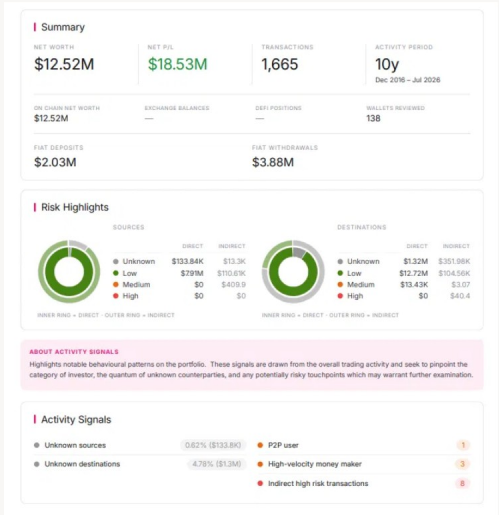
	TRADITIONAL SCREENING	HOPTRAIL
FOCUS	× Transaction and address risk	✓ Client source of wealth
SOURCE	× Client-provided	✓ API connect and CSV upload
COVERAGE	× Chain by chain	✓ All chains in one case
FIAT FLOWS	× Not covered	✓ Fiat in-flows and out-flows
MONITORING	× Individual addresses	✓ The whole client portfolio

Hoptrail's HNWI solutions



Expert EDD and source of wealth reports

Analyst-led investigations that trace the wealth and test it against the client's story.



Hoptrail Platform

One case view of the whole portfolio: net worth, P/L, fiat flows, source and destination risk, and activity signals.

Onboarding a crypto client? Talk to Hoptrail.