

Here are the sources I based my testimony on:

Bank Secrecy Act (1970) — statutory basis for KYC obligations —

<https://www.fincen.gov/resources/statutes-and-regulations/bank-secrecy-act>

FinCEN Customer Identification Program rule (2003, implementing USA PATRIOT Act) — specifies identity verification requirement but not method —

<https://www.ecfr.gov/current/title-31/subtitle-B/chapter-X/part-1020/subpart-C/section-1020.220>

NIST SP 800-63A-4 — *Digital Identity Guidelines: Identity Proofing and Enrollment*, July 2025 — current standard; prohibits KBV for identity verification —

<https://csrc.nist.gov/News/2025/nist-revises-digital-identity-guidelines-sp-800-6> · full

PDF: <https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-63A-4.pdf>

NIST SP 800-63A (2017) — prior version; called KBV "extremely problematic" (§9.3), restricted but did not ban it — <https://pages.nist.gov/800-63-3/sp800-63a.html>

Eve Maler, "Demystifying NIST SP 800-63" — plain-language explainer on the identity assurance framework — <https://workshop.vennfactory.com/p/demystifying-nist-sp-800-63>

National Public Data breach (2024) — Microsoft Support consumer summary (allegedly up to 2.9 billion records / 170 million people) —

<https://support.microsoft.com/en-us/topic/national-public-data-breach-what-you-need-to-know-843686f7-06e2-4e91-8a3f-ae30b7213535>

FTC, *Data Brokers: A Call for Transparency and Accountability* (May 2014) — data accuracy and quality-control gaps —

<https://www.ftc.gov/system/files/documents/reports/data-brokers-call-transparency-accountability-report-federal-trade-commission-may-2014/140527databrokerreport.pdf>

Venkatadri et al., "Auditing Offline Data Brokers via Facebook's Advertising Platform" (WWW 2019) — peer-reviewed study finding at least 40% of data broker attributes inaccurate; over 90% of US Facebook accounts successfully linked to broker data — <https://dl.acm.org/doi/10.1145/3308558.3313666>

TSA, Participating States and Eligible Digital IDs — current list of 21 states + Puerto Rico with TSA-accepted mobile driver's licenses — <https://www.tsa.gov/digital-id/participating-states>

Flanagan, Kiser, Saxe et al., "The Unfinished Digital Estate: Culture, Law, and Technology after Death" — OpenID Foundation, March 3, 2026; produced by the Death and the Digital Estate (DADE) Community Group — <https://openid.net/why-digital-estates-need-standards-and-why-we-need-them-now/> · full PDF: <https://openid.net/wp-content/uploads/2026/03/The-Unfinished-Digital-Estate-Final.pdf>