



September 20, 2026
Via Electronic Email

Co-Chairman, Senator Chris Rothfuss, Chris.Rothfuss@wyoleg.gov
Co-Chairman, Representative Daniel Singh, Daniel.Singh@wyoleg.gov
All Members of Wyoming Legislature Select Committee on Blockchain, Financial Technology
and Digital Innovation Technology

CC: Wyoming Banking Commissioner, WyomingBankingDivision@wyo.gov

**Re: A Proposal for Private Digital Identity Certifier Registration with the Wyoming
Banking Commissioner**

Dear Chairman Rothfuss, Chairman Singh, and Members of the Select Committee:

Thank you for the opportunity for American CryptoFed to provide written testimony for the Digital Identifiers session scheduled at 4:00 PM on September 28, 2026. Scott Moeller and Xiaomeng Zhou will attend the session online to provide oral public comment based on this written testimony.

The Committee's September 15, 2026 working drafts (Wyoming Digital Identifiers and Digital Identity Working Group, Chapter 4, Chapter 5, and Chapter 7) already provide many key building blocks for a decentralized identity architecture. A remaining structural question is whether, alongside the working drafts' Natural Person Credentials issued by the Secretary of State, Wyoming should recognize a parallel category of digital identity credentials issued or attested by qualified private certifiers under uniform Wyoming standards.

Specifically, could the Committee consider a parallel statutory category of "Digital Identity Certifier," defined as a qualified private entity that registers with the Wyoming Banking Commissioner, meets objective eligibility standards, performs identity verification, and issues or cryptographically attests a digital identity credential that may be stored, presented, and relied upon consistent with Chapter 7?

1. **Background.** On June 11, 2020, the Merchant Advisory Group ("MAG") proposed a model to this Committee as follows:¹

¹ See <https://wyoleg.gov/InterimCommittee/2020/S19-20200612MAGLetterregardingDigitalIdentity.pdf>



Identity is the sort of problem that benefits from one universally recognized solution. It should be **a public benefit infrastructure but not controlled by government...**

Private entities which currently process personal information during their normal course of business, have expertise in existing KYC, AML and other regulation and are already required to protect personal information, can serve as identity certifiers. These entities include **banks, credit unions, universities, insurance companies, airlines, pharmacies, utility companies, retail merchants issuing private card programs** and others... However, the users can change their identity certifiers. To this extent, the identity is portable in a similar manner as cell phone numbers.

2. **Existing Administrative Infrastructure and Regulatory Alignment.** The Committee's September 15, 2026 working drafts already tie identity-proofer standards to standards applied by, or developed in consultation with, the Wyoming Banking Commissioner. *See* September 15, 2026 Chapter 4 Working Draft, proposed section 43-4-502(b). The Division of Banking already administers registration programs, including Registration for Non-Lender Creditors.² The Division of Banking regulates banks, trust companies, mortgage companies, and non-bank financial companies, many of which operate within customer-identification, compliance, privacy, and data-security frameworks. Thus, the Committee could consider assigning qualification and registration of private Digital Identity Certifiers to the Banking Commissioner, while preserving roles already assigned to the Secretary of State by the September 15, 2026 working drafts.

Privately issued digital identity credentials could coexist with Natural Person Credentials issued by the Secretary of State.

3. **Potential for broader adoption.** A registration-based framework could broaden adoption by allowing institutions with existing customer relationships and identity-verification systems to participate under uniform Wyoming standards, expanding onboarding channels and reducing duplicated proofing infrastructure. Wyoming could thereby scale legal recognition through institutions that individuals and businesses already use, without requiring the State to build or operate a separate identity-verification network for every credential holder.

4. **Legal recognition by statute rather than government issuance of each credential.** Statutory recognition would preserve uniform Wyoming standards while allowing adoption to scale through qualified private-sector infrastructure. The following language is offered only as an illustrative legislative option for the Committee's consideration:

² See <https://wyomingbankingdivision.wyo.gov/consumer-lending/license-and-registration> ; <https://wyomingbankingdivision.wyo.gov/> ; and W.S. 13-1-603(d).

**Suggested language for discussion only (illustrative):**

Definition. “Digital Identity Certifier” means a qualified private entity registered with the Wyoming Banking Commissioner (“Commissioner”) to perform identity proofing and to issue or cryptographically attest digital identity credentials under this section.

Registration. The Commissioner shall maintain a registry of Digital Identity Certifiers. An applicant may qualify by demonstrating either (i) that it is subject to recognized federal or state customer-identification or identity-verification requirements, including applicable BSA/AML requirements, and applicable privacy and data-security requirements; or (ii) that it maintains equivalent identity-verification, privacy, security, and data-protection controls prescribed by the Commissioner.

Registration fee. The Commissioner may establish by rule reasonable initial registration and annual renewal fees. To the extent practicable, the total fees collected shall approximate but not exceed the direct and indirect costs of administering this section.

Credential issuance. A registered Digital Identity Certifier may verify identity using government-issued identification or other authoritative evidence meeting standards prescribed by the Commissioner and issue or cryptographically attest a digital identity credential that may be stored, presented, transferred, and relied upon consistent with the protections provided in Chapter 7. A credential issued or attested in accordance with this section shall be a legally recognized identity credential under Wyoming law for purposes authorized by this title, subject to other applicable law, and shall not of itself constitute a driver’s license, passport, or other government-issued identification.

State role. Registration shall not require the Commissioner to verify individual credential holders, retain credential-holder personal data, approve individual credentials, or operate a wallet, storage, or presentation service.

Minimum protections. Rules governing credentials issued or attested under this section shall provide protections at least equivalent, as applicable, to the revocation, storage, presentation, verification, reliance, portability, data-minimization, selective-disclosure, purpose-limitation, and retention protections provided in Chapters 4 and 7. Rules shall additionally address responsibility for erroneous certification or misuse and the effect of suspension, revocation, or loss of a Digital Identity Certifier’s registration status on credentials previously issued or attested by that certifier.



5. **Conclusion.** Registration could be streamlined for institutions that, in the ordinary course of business, are already subject to recognized federal or state customer-identification or identity-verification requirements, including applicable BSA/AML requirements, and applicable privacy and data-security requirements. Because not all MAG-listed entities above are subject to FinCEN customer-identification or customer-due-diligence requirements, an equivalent-standards pathway could be available for other qualified applicants. Established third-party identity-verification and data-protection service providers could further reduce implementation burdens.

American CryptoFed respectfully submits this proposal for the Committee's consideration as it continues its work on digital identifiers and identity credentials. We deeply appreciate the Committee's pioneering efforts to explore the frontier of decentralized digital identity.

Sincerely,

/s/ Scott Moeller

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