

Section 15

The money trail: liquidity, AML and KYC

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The money trail: liquidity, AML and KYC

Follow the money. Separate the transactions.

Context & source limits

The commercial-use question becomes sharper when the money flows are separated. Third-party item transfers, Valve's primary sales and external cash-outs are different transactions.

The item is Valve's. The inventory is Valve's. The transfer runs on Valve's servers. **Only the payment happens somewhere else** — which is the step that decides whether anyone is a money transmitter, and the one step Valve does not operate.

The revenue mechanism

Where the money actually moves.

Three paths / one item economy

1. 01 / Account **User inventory**

Items held on Steam

2. 02 / Transfer **P2P trade**

User ↔ bot or user ↔ user

3. 03 / Settlement **External platform**

Site balance or payment off Steam

CirculationThe economic engine extends beyond a transfer fee

Steam supplies the inventory and transfer infrastructure used by outside markets. The investigation's economic argument is that resale liquidity and repeated demand sustain spending on cases, keys and replacement items, with fees on subsequent Community Market sales. A direct P2P transfer carries no Community Market commission; that accounting fact does not settle the wider benefit. Valve retains control over account access and trading restrictions throughout.

1. 01 / Secondary demand **Liquidity & resale value**

External trading and gambling demand

2. 02 / Primary spending **Keys, cases & capsules**

Purchases from Valve where offered

3. 03 / Revenue **Primary-sale income**

Plus fees on actual Market sales

5% + 10%Steam + CS2 fee on Community Market sales

The investigation's economic inference: liquid resale markets can encourage spending on new items. The familiar 15% combines Market fee rates, subject to minimums and rounding; it is not a levy on every external

trade.

[Valve's Community Market fee schedule ↗ archived 2026-09-21 ↗](#). On 25 February 2026 [the New York Attorney General filed an action archived 2026-09-01 ↗](#) alleging that paid loot boxes are connected to external cash resale and gambling harm — the same connection this dossier documents from the technical-infrastructure side. That complaint is an allegation, not a finding; it is cited here because a state law-enforcement agency has put to Valve a question adjacent to the one this dossier asks: where is the enforcement record that matches the public declarations?

1. 01 / Entry**Crypto deposit**

External service and wallet records

2. 02 / Conversion**Balance** → **skins**

Items delivered through Steam trades

3. 03 / Exit**External fiat sale**

Seller, buyer and payout provider

KYC?Identify the control at every handoff

This is the route to investigate, not a native Steam API cash-conversion service. Document identity checks, custody, transaction IDs and payout recipients at each external operator before asserting a no-KYC cash-out.

United States / Bank Secrecy Act

Classify the activity, then the obligation.

FinCEN assesses money transmission by what a business does. Accepting and transmitting convertible virtual currency can trigger money-services obligations, subject to the applicable definitions and exceptions. Valve's Steam Wallet accepts funds and converts them to in-game items; those items are then liquidated through third-party operators for real currency. The item and its transfer run on Valve's infrastructure; the cash-out does not, and whether any part of that cycle meets the money-transmission definitions is a classification question for FinCEN, not a conclusion drawn here.

[FinCEN FIN-2019-G001, §§ 1–2, 5.1 ↗ archived 2025-07-11 ↗](#)

European Union / money laundering

Trace proceeds, knowledge and assistance.

Directive (EU) 2018/1673 covers intentional laundering and participation involving criminal proceeds. The investigative question is what Valve knew about the operators using its trading and OpenID infrastructure after 13 July 2016, when it publicly described that use, and what it did about them. Valve has published no per-operator enforcement record; that record, not this dossier, would answer the question.

[EU criminal-law framework ↗](#)

AMLD6 terminology: the criminal-law directive above is distinct from Directive (EU) 2024/1640, also called AMLD6. The latter has a general transposition deadline of 10 July 2027, with specified exceptions. [Article 78](#)

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