

MEMO:

Why Digital Asset Market Structure Legislation Is Needed Now

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Overview

Crypto represents the future of global digital finance. A failure to act now will cede the United States' historic leadership of market regulation to other jurisdictions, and threatens U.S. dollar dominance and innovation.

- As a signal of crypto's growing importance to global finance, there is a growing convergence between the "TradFi" and crypto industries, with financial services companies across the value chain – including asset managers, financial market infrastructure, payment providers, fintechs and investors – incorporating blockchain-enabled solutions.¹
- As Treasury Secretary Scott Bessent has noted, "clear rules, credible enforcement and a willingness to adapt to innovation have made the American approach to market regulation the world standard... But maintenance of this leadership is far from guaranteed."²
- As digital assets continue to mature as a globally significant market, other jurisdictions have outpaced the United States, resulting in an outsized share of trading activity, investment, influence, and control being outsourced to other jurisdictions.
- Market structure legislation is needed to provide regulatory clarity, strengthen consumer protections, and create clear rules for entrepreneurs and businesses—and avoid ceding further innovation, investment, and market activity to foreign jurisdictions.

¹ World Economic Forum, "A digital economy at an inflection point: What to expect for digital assets in 2026," Sandra Waliczek, January 13, 2026. Available at: <https://www.weforum.org/stories/2026/01/digital-economy-inflection-point-what-to-expect-for-digital-assets-in-2026/#:~:text=TradFi%20converging%20with%20DeFi,transparency%20and%20lower%20transaction%20costs>.

² Wall Street Journal, "Digital Asset Rules Need Clarity," April 8, 2026. Available at: <https://www.wsj.com/opinion/digital-assets-rules-need-clarity-6dfcab70>

The Scale of Crypto’s Importance

Crypto is a globally important market, with rapidly growing adoption within the U.S. at the retail and institutional levels.

- **The total crypto asset market capitalization is \$3.2 trillion.**³
 - This figure does not capture the economic impact of developers, small businesses, and innovators supporting this growing ecosystem, which represent significant additional economic activity.
 - In just 15 years, crypto’s total market capitalization has reached the equivalent of approximately 2.2% of the total global equity market, or 10% of the total gold market.^{4 5}



- **Retail crypto adoption has significantly increased over the past decade.**
 - In the U.S. alone, twenty percent of American adults, or about 68.5 million people, already own cryptocurrency.⁶
 - 52% of Americans are most interested in using crypto to invest for their future, while 39% currently use crypto to make purchases.⁷
 - As of 2024, 83% of American crypto owners agreed there should be stronger crypto regulations.⁸
- **Adoption by businesses is also growing.**

³ CoinGecko

⁴ Statista, “Stocks - United States,” Dashboard. Available at:

<https://www.statista.com/outlook/fmo/stocks/united-states#market-capitalization>

⁵ World Gold Council, “Gold Market Primer: Market size and structure,” April 1, 2026. Available at:

<https://www.gold.org/goldhub/research/market-primer/gold-market-primer-market-size-and-structure>

⁶ National Crypto Association, “2025 State of Crypto Holders Report,” March 2025. Available at:

<https://nca.org/2025%20State%20of%20Crypto%20Holders%20Report.pdf>

⁷ National Crypto Association, “2025 State of Crypto Holders Report,” March 2025.

⁸ Coinbase Institute, “Fact-Finding: Crypto & Americans,” Fact Sheet. Available at:

<https://www.coinbase.com/public-policy/advocacy/documents/fact-finding-crypto-and-americans>

- 4 in 10 small business merchants already accept digital assets as payment, with 4 in 5 merchants agreeing that accepting crypto could help them attract new customers.⁹
- According to Deloitte, as of mid-2025 nearly 1 in 4 surveyed chief financial officers say their finance functions will be using digital currency within two years, citing benefits including enhanced protection of customer privacy and improved cross-border transactions.¹⁰
 - Looking beyond payments, surveyed CFOs also cited supply chain tracking (52%), hedging (44%), capital raising (42%), and payroll (29%) as business cases.¹¹
- Reflecting the broad appeal of crypto use cases to U.S. businesses, the top five sectors adopting cryptocurrencies include telecommunications, education, and real estate, in addition to financial services and technology.¹²
- According to a recent report by the U.S. Chamber of Commerce:
 - 75% of small business owners said regulatory clarity would accelerate adoption.



⁹ Paypal Newsroom, “Crypto Goes Mainstream: 4 in 10 U.S. Merchants Accept Digital Assets,” January 27, 2026. Available at: <https://newsroom.paypal-corp.com/2026-01-27-Crypto-Goes-Mainstream-4-in-10-US-Merchants-Accept-Digital-Assets>

¹⁰ Deloitte Insights, “Crypto is gaining currency with North American CFOs,” Steve Gallucci and John Goff, July 31, 2025. Available at: <https://www.deloitte.com/us/en/insights/topics/business-strategy-growth/2q-2025-cfo-signals-survey.html>

¹¹ Deloitte Insights, “Crypto is gaining currency with North American CFOs,” Steve Gallucci and John Goff, July 31, 2025.

¹² U.S. Chamber of Commerce, “Empowering Small Business: The Impact of Technology on U.S. Small Business, Fourth Edition,” August 13, 2025. Available at: <https://www.uschamber.com/assets/documents/20251621-CTEC-Empowering-Small-Business-Report-2025-v1-r10-Digital-FINAL.pdf>

- 84% of small business owners indicate a willingness to consider using cryptocurrency or stablecoins if it was easy to implement into their business.
 - 73% of small business owners expect crypto to increase as a business payment method, while 66% expect stablecoin use to increase.¹³
 - While small business owners focus on accepting crypto payments, applications for noncrypto blockchain range across their companies to include operational and legal use cases such as supply chain tracking, security, loyalty programs, and smart contracts/automation.¹⁴
- **Non-financial use cases are also growing in national importance.**
 - These include so-called “DePIN” (decentralized physical infrastructure providers) that offer decentralized approaches to critical services including telecommunications, data storage, and compute power.
 - For example, Helium Mobile, a blockchain powered decentralized telecommunications company, is rapidly emerging as a significant disruptor in the US telecommunications industry, serving over 2 million average daily users as of Q4 2025 and partnering with major carriers like T-Mobile and AT&T.¹⁵ It uses blockchain to manage hundreds of thousands of network hotspots.¹⁶

¹³ U.S. Chamber of Commerce, “Empowering Small Business: The Impact of Technology on U.S. Small Business, Fourth Edition,” August 13, 2025. Available at: <https://www.uschamber.com/assets/documents/20251621-CTEC-Empowering-Small-Business-Report-2025-v1-r10-Digital-FINAL.pdf>

¹⁴ U.S. Chamber of Commerce, “Empowering Small Business: The Impact of Technology on U.S. Small Business, Fourth Edition,” August 13, 2025.

¹⁵ Helium Blog (Medium), “Helium 2025: Year in Review,” December 19, 2025. Available at: <https://blog.helium.com/2025-a622e55e4f6d>

¹⁶ Center for a Digital Future: Impact Base, “Helium Case Study,” Database. Available at: <https://www.centerfordigitalfuture.org/blog/60kqfdgb4f8kljqy1j4ujvaqr1bx5y-364pg-bskhw-58gfs-c9t7w-6ec5j>

Ceding Influence to Other Jurisdictions

However, as the following sections in this document demonstrate, the global crypto industry’s center of gravity is leaving the United States – incentivized by friendlier regulatory regimes in foreign jurisdictions.¹⁷

- In particular, comprehensive regulatory frameworks implemented in the European Union, Hong Kong, United Arab Emirates, and Singapore have provided clarity for digital asset businesses that has encouraged relocation and expansion in those jurisdictions (see graphic on following page).

(See section “[Repatriation to U.S. Due to More Supportive Regulatory Momentum](#)” for a discussion of nascent activity around firms repatriating to the U.S. following passage of the GENIUS Act.)

¹⁷ Fintech UAE, “UAE Emerges as Crypto Powerhouse in MENA, Home to 1,800+ Industry Stakeholders,” May 24, 2023. Available at: <https://fintechnews.ae/16873/fintechdubai/uae-emerges-as-crypto-powerhouse-in-mena-home-to-1800-industry-stakeholders/>; Trading View, “Here’s why crypto is moving to Dubai and Abu Dhabi,” January 14, 2026. Available at: <https://www.tradingview.com/news/cointelegraph:5881ad19f094b:0-here-s-why-crypto-is-moving-to-dubai-and-abu-dhabi/>; Blockhead, “Dubai’s Crypto Moment is Over – For Now,” April 10, 2026. Available at: <https://www.blockhead.co/2026/04/10/dubais-crypto-moment-is-over-for-now/>; Fintech Singapore, “The Latest List of Licensed Cryptocurrency Providers in Singapore (2026),” January 7, 2026. Available at: <https://fintechnews.sg/latest-list-licensed-cryptocurrency-providers-in-singapore/>; Yahoo! Finance, “Singapore leads global crypto job opportunities per capita,” May 29, 2025. Available at: <https://finance.yahoo.com/news/singapore-leads-global-crypto-job-100823173.html>; TRM, “Unpacking Singapore’s Financial Services and Markets Act: What Crypto Firms Need to Know,” June 26, 2025. Available at: <https://www.trmlabs.com/resources/blog/unpacking-singapores-financial-services-and-markets-act-what-crypto-firms-need-to-know>; Bloomberg, “Singapore’s Unlicensed Crypto Exchanges to Weigh Exit,” Suvashree Ghosh, June 11, 2025. Available at: <https://www.bloomberg.com/news/articles/2025-06-11/singapore-order-leads-unlicensed-crypto-exchanges-to-weigh-exit>; BeInCrypto, “How Europe Became the Global Hub for Crypto-Friendly Bank,” Linh Bui, March 13, 2025. Available at: <https://beincrypto.com/how-europe-became-the-global-hub-for-crypto-friendly-bank/>

Leading Foreign Jurisdictions Supportive of Crypto

European Union

Regulatory Development

- The EU adopted its comprehensive Markets in Crypto-Assets Regulation in April 2023, with stablecoin rules taking effect June 2024 and the full CASP licensing regime live December 30, 2024.
- A single MiCA license provides passporting rights across all 27 member states.

Industry Growth

- Since the adoption of MiCA rules, approximately 180 CASP licenses and 40 stablecoin licenses have been issued across EU member states since December 30, 2024.
- MiCA-compliant businesses saw a 45% increase in institutional investments compared to non-compliant platforms.
- MiCA has increased bank participation in crypto, with up to 55 banks in Europe having integrated cryptocurrency-related services.

Hong Kong

Regulatory Development

- Hong Kong introduced mandatory VASP/VATP licensing for all centralized exchanges effective June 2023 – the first jurisdiction in Asia to permit licensed retail investor access for non-security tokens.
- Hong Kong passed the Stablecoin Ordinance (Cap. 656) in May 2025, introducing Asia's first comprehensive regulatory framework for fiat-backed stablecoins.
- Hong Kong also offers tax competitiveness, with zero capital gains tax on digital assets.

Industry Growth

- By February 2025, nine entities had been granted Hong Kong VASP licenses, with a simplified assessment procedure introduced in January 2025 to accelerate approvals.
- Hong Kong is home to 175 blockchain application or software firms and 111 digital asset and cryptocurrency companies, which marked 250% and 30% increases, respectively, since 2022.
- Digital assets and tokenized asset transaction volumes processed by banks reached HK\$26.1 billion (US\$3.3 billion) in the first half of 2025, representing year-on-year growth of 233%.

United Arab Emirates

Regulatory Development

- The UAE implemented the world's most pro-crypto regulatory stack, starting with Abu Dhabi Global Market's (ADGM) crypto framework in 2018, followed by the creation of Dubai's dedicated Virtual Assets Regulatory Authority (VARA) in 2022, and a complete VAT exemption on crypto transactions in October 2024.

Industry Growth

- More than 1,800 crypto companies are now based in the UAE, employing more than 8,600 people. Abu Dhabi's ADGM reported a 67% increase in new licenses in Q1 2025 compared to Q1 2024.
- Since the war with Iran started, Binance has begun moving staff to other friendly jurisdictions, including Hong Kong, Tokyo, Kuala Lumpur, and Bangkok – not the U.S.

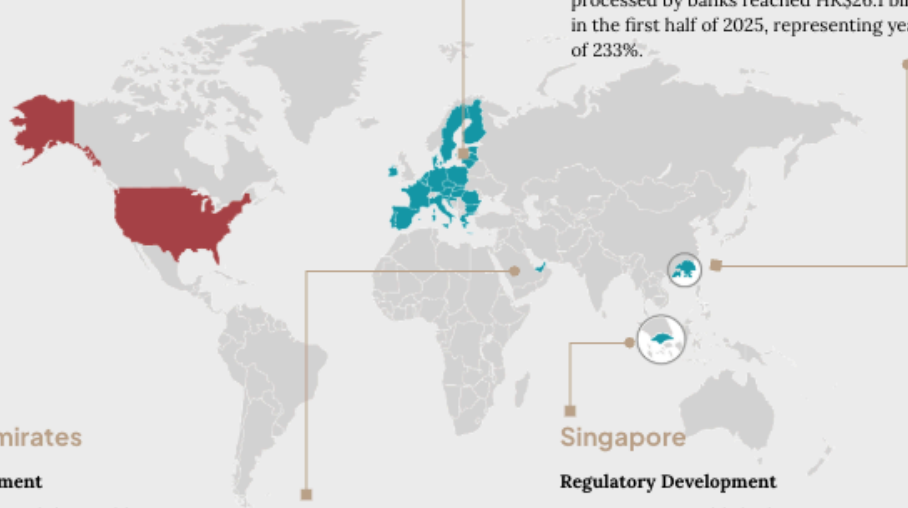
Singapore

Regulatory Development

- Singapore established its Payment Services Act licensing framework for digital payment token providers in 2019, years ahead of comparable U.S. action, making it a preferred domicile for major exchanges and institutional crypto infrastructure.

Industry Growth

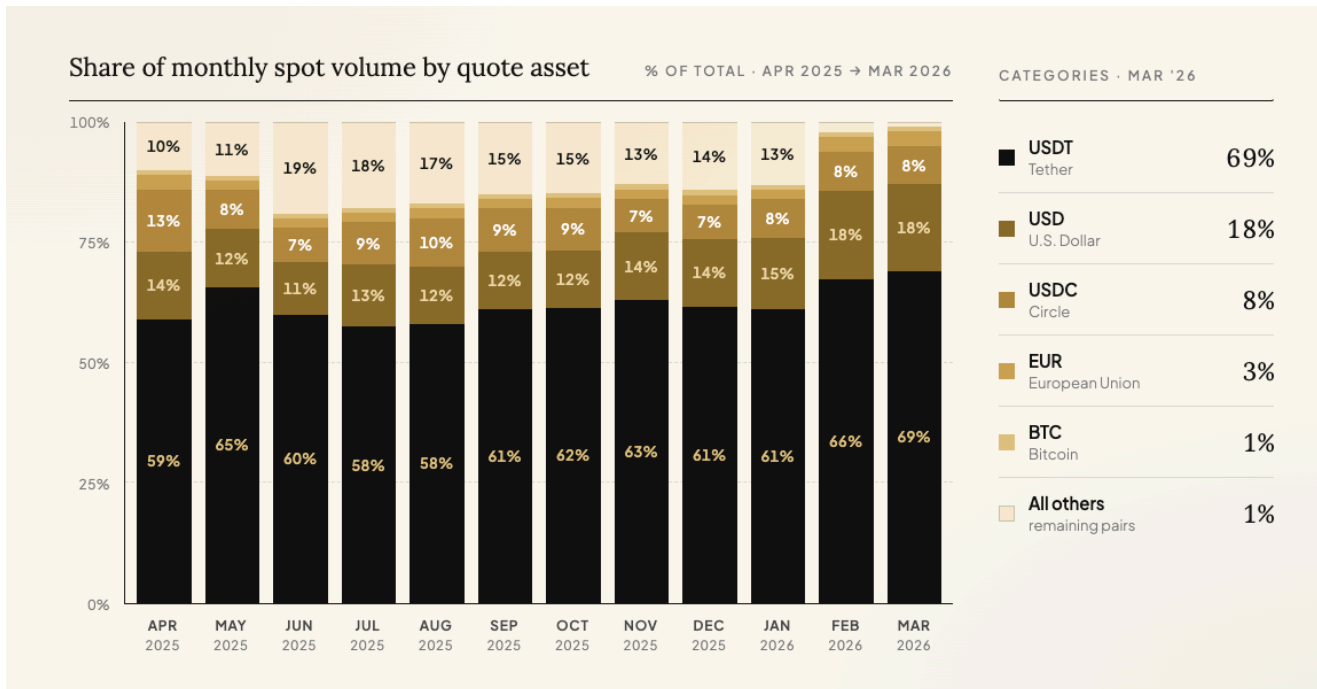
- As of January 2026, MAS had granted 36 Major Payment Institution licenses for digital payment token services and issued 13 new licenses in 2024 alone, significantly more than prior years. Standard Chartered, Coinbase, Circle, OKX, and Ripple all hold MAS licenses and have established substantive operations in the city-state. The country hosts more than 700 operational Web3 companies, and as of 2025 had the highest density of crypto jobs per capita in the world.
- Singapore's approach became more selective in 2025 with new licensing requirements (it effectively closed the door on offshore-only models under FSMA). This has prompted some major crypto companies to leave, including to the UAE, such as Bitget and Bybit.



Implications for U.S. Dollar Dominance

The majority of U.S. pegged trading global trading volume does not occur via U.S. regulated instruments.

- Across centralized exchanges (see following section for more detailed on centralized exchanges), the majority of spot trading volume across all trading pairs is done via dollar-pegged stablecoins.¹⁸
 - However, while dollar-pegged instruments represent a majority of trading activity in global markets, the majority flows through an instrument (USDT, issued by foreign-based issuer Tether) that sits outside of U.S. supervisory jurisdiction.
- The U.S. gets none of the oversight, sanctions enforcement, or financial intelligence that has historically come with being the world's reserve currency, because the dominant instrument is a foreign-issued product that merely mimics the dollar.



Source: CCI Analysis of data from The Block¹⁹

¹⁸ CoinGeck, "Spot CEX Report 2026," April 9, 2026.

<https://www.coingecko.com/research/publications/spot-centralized-exchanges-report-2026>

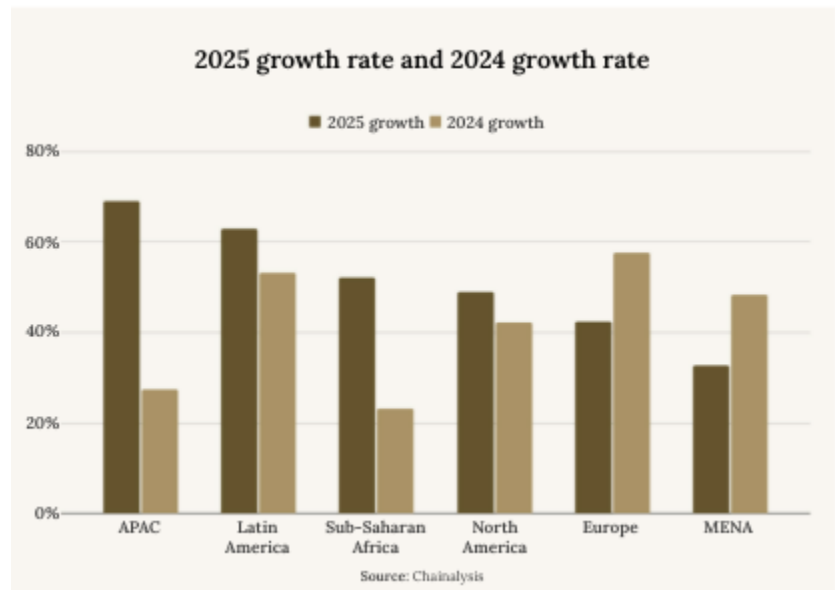
¹⁹

<https://www.theblock.co/data/crypto-markets/spot/share-of-trade-volume-by-pair-denomination>

Offshoring

The highest-leverage parts of the market already have an offshore center of gravity. Without comprehensive market structure legislation, this center will not shift back.

- The U.S. currently receives about 22.5% of global on-chain crypto activity – a significant but not dominant share.²⁰ The jurisdictions actively competing for the other 77.5% have greater regulatory clarity.
- While North American and Europe dominate on-chain activity in absolute terms (receiving over \$2.2 trillion and \$2.6 trillion in 2025, respectively), growth in other regions is leapfrogging that of the U.S. – with significant outpacing happening in just the past year (see chart below).
- Achieving a “golden age for digital assets” in the U.S. requires a comprehensive federal legislative framework.²¹
- Congress must act to prevent fragmentation and regulatory ambiguity; clear jurisdictional boundaries and CFTC spot authority will strengthen U.S. markets.²²



²⁰ Chainalysis, “North America: Institutional Momentum and U.S. Bitcoin ETPs Propel Crypto Further Into the Mainstream,” October 17, 2024. Available at:

<https://www.chainalysis.com/blog/north-america-crypto-adoption-2024/>

²¹ Written Testimony of Ji Hun Kim, CEO, Crypto Council for Innovation before the United States Senate Committee on Agriculture, Nutrition, & Forestry in a hearing entitled “Stakeholder Perspectives on Federal Oversight of Digital Commodities,” July 15, 2025. Available at:

https://www.agriculture.senate.gov/imo/media/doc/0191b61d-939c-565e-ee00-5fadab52e8c4/Testimony_Kim_07.15.2025.pdf

²² Written Testimony of Ji Hun Kim, CEO, Crypto Council for Innovation before the United States House of Representatives Committee on Financial Services Subcommittee on Digital Assets, Financial Technology and Artificial Intelligence, in a hearing entitled “A Golden Age of Digital Assets: Charting a Path Forward,”

Centralized Exchanges (CEX)

The exchange market is the engine of crypto liquidity, price discovery, and user trust. That engine is almost entirely foreign-owned.

- In 2025, across the top 10 exchanges by market share, only two were U.S. based - Coinbase and OKX (coming in at #7 and #8, see below table; OKX only domiciled in the US for the first time this year as the regulatory environment became more clear, spending the rest of its development time as a foreign-based exchange).²³
- In 2025, Binance dominated centralized exchanges with a 39.2% share of the top 10 venues' combined trading volume, pushing \$7.3 trillion in volume as the top ten exchanges totaled \$18.7 trillion.²⁴ The second largest centralized exchange, Bybit, trailed with 8.1% market share, recording \$1.5 trillion in volume.²⁵
- This split of exchanges is at odds with the scale of adoption and crypto activity in the U.S.
 - In the U.S. alone, twenty percent of American adults, or about 68.5 million people, already own cryptocurrency.²⁶
 - According to Chainalysis, as of 2024 North America represented 22.5% of global on-chain activity.²⁷
- The majority of CEX trading growth and adoption is occurring in jurisdictions outside of the US, suggesting that these trends will continue without the US addressing the underlying regulatory uncertainty.

February 11, 2025. Available at:

<https://docs.house.gov/meetings/BA/BA21/20250211/117872/HHRG-119-BA21-Wstate-KimJ-20250211.pdf>

²³ CoinGecko Research, "Market Share of Centralized Crypto Exchanges, by Trading Volume," Shaun Paul Lee, April 17, 2026. Available at:

<https://www.coingecko.com/research/publications/centralized-crypto-exchanges-market-share>

²⁴ CoinGecko Research, "Market Share of Centralized Crypto Exchanges, by Trading Volume," Shaun Paul Lee, April 17, 2026. Available at:

<https://www.coingecko.com/research/publications/centralized-crypto-exchanges-market-share>

²⁵ CoinGecko Research, "Market Share of Centralized Crypto Exchanges, by Trading Volume."

²⁶ National Crypto Association, "2025 State of Crypto Holders Report," March 2025. Available at:

<https://nca.org/2025%20State%20of%20Crypto%20Holders%20Report.pdf>

²⁷ Chainalysis, "North America: Institutional Momentum and U.S. Bitcoin ETPs Propel Crypto Further Into the Mainstream," October 17, 2024. Available at:

<https://www.chainalysis.com/blog/north-america-crypto-adoption-2024/>

- From 2020 to 2025, jurisdictions outside of the US represent ~90-95% of global trading volume.²⁸ Coinbase, the U.S. 's largest exchange, held just 5-7% of global trading volume in 2025.²⁹
- The US represented only roughly 8% of growth throughout these years.
- Growth trends suggest this dynamic is getting worse, with U.S. CEX volume growth has notably declined from 2020 through 2025.

Top 10 Centralized Exchanges by Market Share (2025)

Source: CoinGecko, 2025; domicile data added by CCI

Rank	Exchange	Market Share (% of top 10 exchanges)	Headquarters / Domicile	
1	Binance	39.2%	Cayman Islands / Abu Dhabi, UAE	Foreign
2	Bybit	8.1%	Dubai, UAE	Foreign
3	MEXC	7.8%	Seychelles	Foreign
4	Gate	7.5%	Cayman Islands	Foreign
5	Crypto.com	7.2%	Singapore	Foreign
6	Bitget	6.4%	Seychelles	Foreign
7	OKX	6.3%	San Jose, CA (redomiciled to the US April 2025, but spent nearly its entire history as a foreign exchange) ³⁰	U.S.-based
8	Coinbase	6.1%	San Francisco, CA	U.S.-based
9	HTX	6.0%	Seychelles	Foreign
10	Upbit	5.5%	Seoul, South Korea	Foreign

²⁸ CoinGecko Research, “Market Share of Centralized Crypto Exchanges, by Trading Volume.”

²⁹ CoinGecko Research, “Market Share of Centralized Crypto Exchanges, by Trading Volume.”

³⁰ OKX has cited regulatory momentum as a key factor in its repatriation to the U.S. See the discussion in the following section of this document titled “Repatriation to U.S. due to more supportive regulatory momentum.”

Top 10 Centralized Exchanges: 2025 YoY growth

Source: CoinGecko, 2025; domicile data added by CCI

Rank	Exchange	2025 YoY Growth (%)	Headquarters / Domicile	
1	Binance	-0.5%	Cayman Islands / Abu Dhabi, UAE	Foreign
2	Bybit	-13.7%	Dubai, UAE	Foreign
3	MEXC	+90.9%	Seychelles	Foreign
4	Gate	+39.7%	Cayman Islands	Foreign
5	Crypto.com	+4.3%	Singapore	Foreign
6	Bitget	+45.5%	Seychelles	Foreign
7	OKX	-0.5%	San Jose, CA <i>(redomiciled to the US Apr. 2025, but spent nearly its entire history as a foreign exchange)</i>	U.S.-based
8	Coinbase	+2.8%	San Francisco, CA	U.S.-based
9	HTX	+35.6%	Seychelles	Foreign
10	Upbit	-18.9%	Seoul, South Korea	Foreign

2020 - 2025 Annual Volume of CEX's by Jurisdiction

Source: CoinGecko, 2020-2025; domicile data added by CCI

Year	US CEX Volume %	Non-US CEX Volume %
2020	~8%	~92%
2021	~9%	~91%
2022	~8%	~92%
2023	~8%	~92%
2024	~8%	~92%
2025	~7-8%	~92-93%

2020 - 2025 Annual Volume Growth of CEX's by jurisdiction

Year	US CEX Growth %	Non-US CEX Growth %
2020-2021	~10-15%	~85-90%
2021-2022	~5-10%	~90-95%
2022-2023	~5-10%	~90-95%
2023-2024	~5-8%	~92-95%
2024-2025	~2-5%	~95-98%

Decentralized Exchanges (DEX)

While the U.S. never led in CEX, in DEX the American nationals have built the dominant protocols. However, American DEX are at risk of regulatory attrition forcing them offshore or limiting them to inferior products for American users.

- The open-source, non-custodial nature of decentralized exchanges has empowered American developers to innovate in spite of a lack of industry-wide policy infrastructure.
 - Uniswap was founded in NYC in 2018, and quickly grew into the world’s dominant spot DEX. As of August 2025, Uniswap was the largest DEX by trading volume, with market share at 35.9% at that time.³¹
 - While on-chain transaction data on the platform cannot be tracked geographically, Uniswap's app received 5.3 million visits in December 2024, with 40.25% coming from the U.S. – roughly five times the share from its next-largest market, Brazil (8.69%), and nearly eight times the UK (5.5%).³²
 - dYdX was founded in San Francisco in 2017, and has gone on to generate over \$1.5 trillion in lifetime trading volume.³³
- However, attrition has precluded some of the most rapidly growing exchanges from offering services to US customers.
 - A Wells Notice issued to Uniswap Labs in April 2024 had a chilling effect on the industry.
 - Hyperliquid has become the dominant force in offering perpetuals. By August 2025, Hyperliquid commanded 70–80% market share in decentralized perpetuals, handling over \$350 billion in monthly volume and frequently

³¹ CoinGecko Research, “Market Share of Centralized Crypto Exchanges, by Trading Volume,” Shaun Paul Lee, April 17, 2026. Available at:

<https://www.coingecko.com/research/publications/centralized-crypto-exchanges-market-share>

³² Statista, “Country of origin of desktop traffic to Decentralized Finance (DeFi) exchange (DEX) Uniswap in August 2024.” Available at:

<https://www.statista.com/statistics/1297771/share-of-uniswap-visitors-by-country/>

³³ Reuters, “Decentralized crypto exchange dYdX plans for US market entry by year-end,” Hannah Lang, October 30, 2025. Available at:

<https://www.reuters.com/business/decentralized-crypto-exchange-dydx-plans-us-market-entry-by-year-end-2025-10-30/>

exceeding \$30 billion per day, but does not offer its core services within the US.³⁴

- dYdX, launched in the U.S. offering only spot trading. dYdX has explicitly excluded U.S. users from perpetuals due to regulatory scrutiny.³⁵
- While the U.S. has allowed innovation in decentralized infrastructure to flourish domestically, but has not provided a viable pathway for compliant, onshore trading venues—particularly for derivatives.
 - The CFTC only began formally examining whether perpetual derivatives could be permitted in U.S. markets in April 2025. The Commission issued a formal Request for Comment in April 2025 to gather public input on "the use cases, challenges, and opportunities perpetual contracts may present."³⁶ That process is still ongoing.
 - The market has not waited. Hyperliquid's perpetual futures volume grew from \$25.9 billion in June 2024 to \$2.63 trillion in May 2025 – almost entirely accruing outside U.S. regulatory jurisdiction – before Coinbase and Robinhood announced their first regulated U.S. perpetuals products in mid-2025.³⁷ Hyperliquid has since announced that, for the first time, investors outside the U.S. will be able to gain leveraged exposure to the stock index using an officially licensed product that's also digitally native, the index provider said in a Wednesday announcement.³⁸
 - Even platforms that deliberately excluded U.S. users to avoid regulatory risk draw their largest audience from the U.S., which illustrates both the scale of suppressed U.S. demand and the cost of the current policy vacuum. Despite the platform explicitly prohibiting U.S. users under its Terms of Use, data shows that the United States is Hyperliquid's largest traffic source at 17.32%

³⁴ BingX, "What Are the Top Perp DEXs (Perpetual DEXs) to Know in 2026?" October 25, 2025. Available at:

<https://bingx.com/en/learn/article/top-perp-dex-perpetual-decentralized-exchange-to-know>

³⁵ Reuters, "Decentralized crypto exchange dYdX plans for US market entry by year-end."

³⁶ Commodity Futures Trading Commission, "CFTC Staff Seek Public Comment Regarding Perpetual Contracts in Derivatives Markets," April 21, 2025. Available at:

<https://www.cftc.gov/PressRoom/PressReleases/9069-25>

³⁷ Unchained, "Hyperliquid Reignited Interest in Crypto Perps. Can Coinbase and Robinhood Capitalize?" Steven Ehrlich, June 25, 2025. Available at:

<https://unchainedcrypto.com/hyperliquid-reignited-interest-in-crypto-perps-can-coinbase-and-robinhood-capitalize/>

³⁸ Yahoo! Finance, "You Can Now Trade Official S&P 500 Perpetual Futures via Hyperliquid," André Beganski, March 18, 2026. Available at:

<https://finance.yahoo.com/news/now-trade-official-p-500-173838505.html>

of the platform's 3.6 million monthly visits, ahead of the UK (10.25%), Singapore (6.68%), Hong Kong (5.88%), and France (5.22%).³⁹

- Since SEC declined to pursue further action after issuing a Wells Notice against Uniswap, activity has picked up.^{40 41}
 - Uniswap captured about 6.1% of total global exchange market share over 2025 - 2026, enough to place it in competition with major centralized rivals.

Stablecoin Issuers

Stablecoins – the "digital dollar" layer of the crypto economy – are a strategic asset for U.S. financial power. Yet without regulatory clarity, the benefits of U.S. dollar dominance are primarily accruing to a foreign firm.

- Despite the critical importance of stablecoins to drive digital dollar dominance, the dominant stablecoin issuer is not American.
 - As of May 1, 2026, the total stablecoin market cap is roughly \$322 billion.⁴² Growth is up 50% year over year.⁴³
 - USDT (Tether) comprises \$189.5 billion (~59%).⁴⁴ Tether (USDT) is registered in El Salvador and operates outside U.S. regulatory jurisdiction.
 - The dominant U.S. based issuer, USDC (Circle), comprises only \$77.2 billion (~24%).⁴⁵

³⁹ Data Wallet, "Hyperliquid Supported and Restricted Countries," Jed Barker, April 6, 2025. Available at:

<https://www.datawallet.com/crypto/hyperliquid-supported-and-restricted-countries>

⁴⁰ Uniswap Blog, "A Win for DeFi – SEC Closes Investigation into Uniswap Labs," February 24, 2025. Available at: <https://blog.uniswap.org/a-win-for-defi>

⁴¹ Yahoo! Finance, "SEC Closes Investigation Into Uniswap Labs, Marking a Key Victory for DeFi Industry," Ayesha Aziz, February 25, 2025. Available at: <https://finance.yahoo.com/news/sec-closes-investigation-uniswap-labs-075128190.html>

⁴² CoinMarketCap, "Top Stablecoin Tokens by Market Capitalization," Dashboard. Available at: <https://coinmarketcap.com/view/stablecoin/>

⁴³ CoinDesk, "Stablecoin market hits \$312 billion as banks, card networks embrace onchain dollars," Will Canny, March 10, 2026. Available at: <https://www.coindesk.com/business/2026/03/10/stablecoins-are-starting-to-reshape-payments-and-banking-macquarie-says>

⁴⁴ CoinMarketCap, "Top Stablecoin Tokens by Market Capitalization," Dashboard. Available at: <https://coinmarketcap.com/view/stablecoin/>

⁴⁵ CoinMarketCap, "Top Stablecoin Tokens by Market Capitalization," Dashboard. Available at: <https://coinmarketcap.com/view/stablecoin/>

- While the GENIUS Act has not yet been fully implemented, it has helped to drive significant institutional interest in digital assets.
 - Growing interest in stablecoins coincides with a rise in institutional activity around stablecoins:
 - Major traditional financial institutions and central banks have announced intentions to launch their own stablecoins.⁴⁶
 - Crypto platforms such as Kraken, MetaMask, and Crypto.com, among others, have introduced stablecoin payments that are linked to cards.⁴⁷
 - Major payment processors such as Stripe, Mastercard, and Visa have launched products that empower consumers to spend stablecoins via traditional payment rails.^{49 50}
 - Other platforms such as Circle and Paxos have sought to address merchant settlement for stablecoin payments.^{51 52}

⁴⁶ Reuters, “Major banks explore issuing stablecoin pegged to G7 currencies,” Elizabeth Howcroft and Tommy Reggiori Wilkes, October 10, 2025. Available at: <https://www.reuters.com/business/finance/major-banks-explore-issuing-stablecoins-pegged-g7-currencies-2025-10-10/>

⁴⁷ Mastercard Newsroom, “Mastercard unveils end-to-end capabilities to power stablecoin transactions – from wallets to checkouts,” April 28, 2025. Available at: <https://www.mastercard.com/news/press/2025/april/mastercard-unveils-end-to-end-capabilities-to-power-stablecoin-transactions-from-wallets-to-checkouts/>

⁴⁸ Coindesk, “Kraken Teams Up With Mastercard to Introduce Crypto Debit Cards,” Francisco Rodrigues, April 9, 2025. Available at: <https://www.coindesk.com/business/2025/04/09/kraken-teams-up-with-mastercard-to-introduce-crypto-debit-cards>

⁴⁹ Stripe Newsroom, “Stripe accelerates the utility of AI and stablecoins with major launches,” May 7, 2025. Available at: <https://stripe.com/newsroom/news/sessions-2025>

⁵⁰ Coin Telegraph, “Mastercard links with Circle, Paxos for merchant stablecoin payments,” Stephen Katte, April 28, 2025. Available at:

<https://cointelegraph.com/news/mastercard-partners-circle-paxos-expand-stablecoin-support-merchants>

⁵¹ PR Newswire, “Paxos Launches New Stablecoin Payments Platform,” October 15, 2024. <https://www.prnewswire.com/news-releases/paxos-launches-new-stablecoin-payments-platform-302276303.html>

⁵² PYMNTS, “Circle Launches Managed Payments for Stablecoin Settlement,” April 8, 2026. Available at: <https://www.pymnts.com/cryptocurrency/2026/circle-launches-managed-payments-for-stablecoin-settlement/>

The Importance of Onshoring Innovation in the US

Capital, talent, and market activity are path-dependent. There is a critical agglomerative effect to locating industry in the U.S. Once firms build compliance, talent, and physical infrastructure, it becomes harder to come back to the U.S.

Builders

People building in the ecosystem are a critical driver of infrastructure and capital.

- **Investment tends to follow developers in crypto.**
 - Ethereum, combined with its L2s, was the top destination for new developers in 2025, which correlates with it attracting the highest levels of VC investment. Solana is one of the fastest-growing ecosystems, with builder interest increasing by 78% in the last two years.⁵³
- **However, current trends overall are unfavorable for crypto talent in the U.S.**
 - According to Electric Capital, as of 2026, 80% of crypto developers now live outside the United States, and the U.S. proportion of global developer share has dropped by 51% over nearly ten years (from 38% share to 19%)⁵⁴.
 - In research conducted by CCI with the W.K. Kellogg Foundation on underrepresented builders in Web3⁵⁵:
 - 1 in 10 builders we spoke with indicated they had halted potential offerings or shut down products for fear of possible regulatory action, citing an inability to comply in the absence of clear policy.
 - 40% indicated they would consider moving offshore if they had the ability to do so.
 - Some suggest that regulatory headwinds have provided further encouragement for U.S. based developers to shift focus to AI, which is

⁵³ A16z, “State of Crypto 2025: The year crypto went mainstream,” Daren Matsuoka, Robert Hackett, Jeremy Zhang, Stephanie Zinn, and Eddy Lazzarin, October 22, 2025. Available at: <https://a16zcrypto.com/posts/article/state-of-crypto-report-2025/>

⁵⁴ Electric Capital, “Developer Report Dashboard: Crypto Developer Geography Trends,” 2026. <https://www.developerreport.com/geography>

⁵⁵ Crypto Council for Innovation, “Building a More Equitable Web3,” Renée Barton, July 2024. Available at: <https://static1.squarespace.com/static/66030e797dd6ff5a6c50d60d/t/66e22d3572faba5e03dad5f/1726098751541/Building+a+More+Equitable+Web3+-+CCI.pdf>

perceived to have faster adoption and offer a more immediate, less regulatorily constrained path to productivity.^{56 57}

- **Industry has called for protections for software developers in market structure to ensure against the erosion of domestic talent.**
 - Over 110 industry actors led by the DeFi Education Fund issued a letter calling for protections for open-software developers in market structure.⁵⁸

Physical Infrastructure: Staking & Mining

Onshoring crypto infrastructure creates durable, place-based investment and employment that compounds over time (similar to any capital-intensive manufacturing or data infrastructure sector).

- **The United States already holds the largest share of Bitcoin mining globally by a wide margin.**⁵⁹
 - This is not a legacy position – it was earned after China banned mining in 2021 and U.S. regulatory and energy conditions made the country the natural successor (while China has since partially recovered its share of overall mining, it should be noted that this is through underground operations).^{60 61}

⁵⁶ CryptoSlate, “Bitcoin is at risk of a talent drain because AI just created 1.3 million jobs,” Gino Mattos, February 14, 2026. Available at:

<https://cryptoslate.com/crypto-enters-a-16-day-danger-zone-as-top-crypto-operators-rotate-int-o-ai/>

⁵⁷ DailyCoin, “Crypto’s Developer Crisis: Why Builders Are Walking Away,” Simona Ram, April 15, 2025. Available at: <https://dailycoin.com/cryptos-developer-crisis-why-builders-are-walking-away/>

⁵⁸ DeFi Education Fund, “DEF & 110+ Partners Submit Coalition Letter on Developer Protections in Market Structure,” August 27, 2025. Available at:

<https://www.defieducationfund.org/def-110-partners-submit-coalition-letter-on-developer-protections-in-market-structure/>

⁵⁹ Hashrate Index, “Top 10 Bitcoin Mining Countries of 2026,” December 31, 2025. Available at:

<https://hashrateindex.com/blog/top-10-bitcoin-mining-countries-of-2026/>

⁶⁰ CNBC, “U.S. officially the top destination for bitcoin miners, beating out China for the first time,” MacKenzie Sigalos, October 13, 2021. Available at:

<https://www.cnbc.com/2021/10/13/us-beats-china-as-the-number-one-destination-for-bitcoin-miners.html>

⁶¹ University of Cambridge Judge Business School, “Bitcoin Mining Map,” Dashboard. Available at:

https://ccaf.io/cbnsi/cbeci/mining_map

(Note that the last data available dates to January 2022, demonstrating the impact of Chinese policy changes.)

- According to research from The Perryman Group, Bitcoin mining contributes over \$4.1 billion in annual U.S. gross product, supports more than 31,020 jobs nationwide, and generates upwards of \$2.5 billion in personal income.⁶²
- CCI research found that Bitcoin mining is uniquely suited to support the energy transition due to its flexibility, consistency, and transparency – miners can rapidly adjust demand in response to grid conditions, serve as a consistent buyer for stranded and renewable energy that would otherwise be curtailed, and convert harmful byproducts like flared gas into productive use.⁶³
- Concentrating hashrate domestically is a national security concern. As one CoinDesk analysis frames it: "The more hash power that resides in a given country, the more influence the state could have in protecting its interests... Having a stake in global hashrate is key. By fostering, rather than banning domestic mining industries, nations can ensure that control over the network does not fall into the hands of their enemies."⁶⁴
- **Staking secures billions in proof-of-stakes networks, supporting a growing base of activity and use cases.**^{65 66}
 - Today, over \$700 billion of value is secured by staking on proof-of-stake networks, with approximately \$245 billion in assets directly staked – a

⁶² Mara, "The Economic Impact of Bitcoin Mining: Jobs, Investment, & Energy Stability," February 20, 2025. Available at: <https://www.mara.com/posts/the-economic-impact-of-bitcoin-mining-jobs-investment-energy-stability>

⁶³ Crypto Council for Innovation, "Proof of Work & Enabling the Energy Transition," 2023. Available at:

<https://cryptoforinnovation.org/proof-of-work-enabling-the-energy-transitions/>

(The report documents nearly two dozen U.S. mining sites that collectively represent more than 3 GW of new renewable energy added to the grid over the long run, while demonstrating the ability to balance grid instability by powering operations up or down within a 5–15 second timeframe.)

⁶⁴ CoinDesk, "Why Bitcoin Mining Is a Matter of National Security," Ben Caselin, June 14, 2024.

Available at:

<https://www.coindesk.com/opinion/2022/04/04/why-bitcoin-mining-is-a-matter-of-national-security>

⁶⁵ Crypto Council for Innovation, "How Revising Tax Policy on Staking can Secure a Growing Sector of the Financial System," Alison Mangiero and Renée Barton, March 12, 2026. Available at:

<https://cryptoforinnovation.org/how-revising-tax-policy-on-staking-can-secure-a-growing-sector-of-the-financial-system/>

⁶⁶ Crypto Council for Innovation, "How Revising Tax Policy on Staking can Secure a Growing Sector of the Financial System."

significant expansion since Ethereum (the largest proof-of-stake network by volume) first transitioned from proof-of-work to proof-of-stake in 2022.⁶⁷

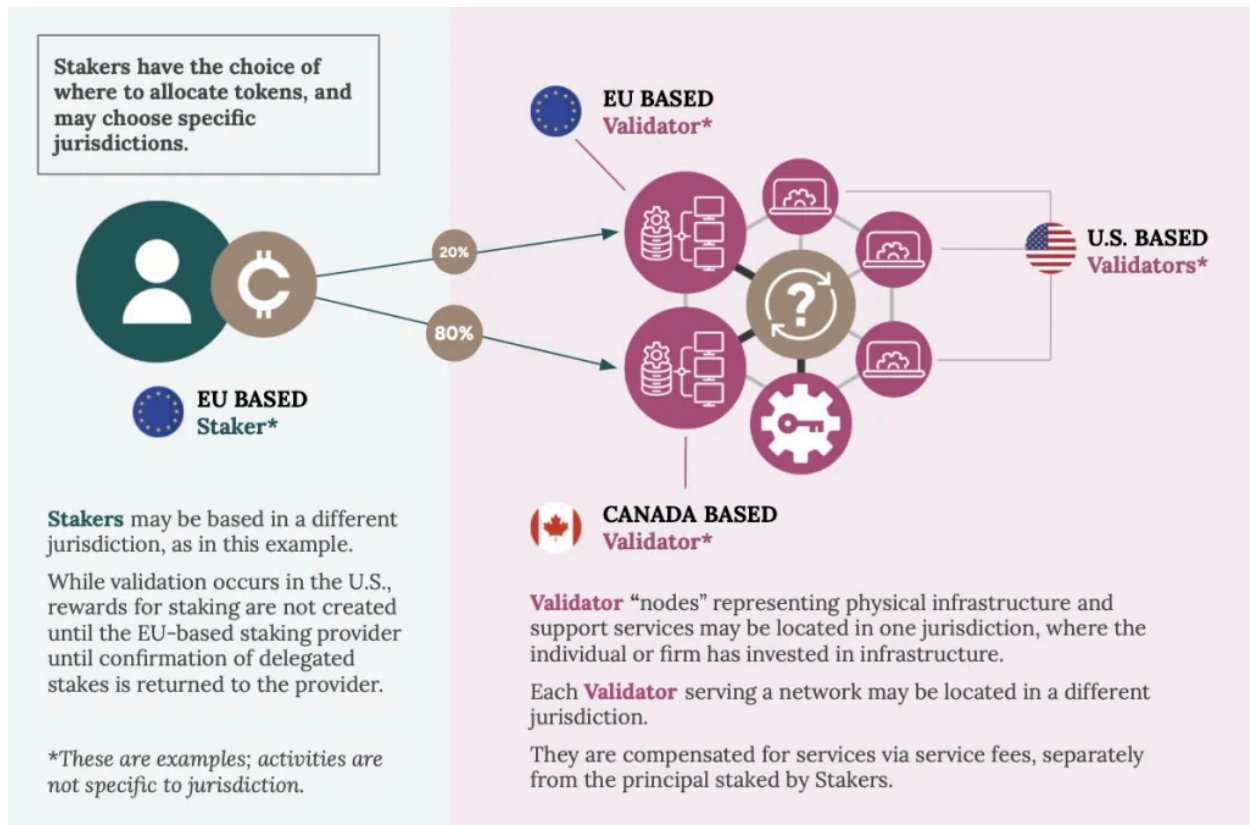
- Individuals are increasingly participating in the validation of these networks; for example, tax filings from Coinbase – a major retail staking provider – show that retail staked assets on the platform grew in value by 62% from 2023 to 2024 alone.⁶⁸
- Staking does not have the same "51% attack" dynamics as mining, but the geographic distribution of validators affects network resilience, censorship resistance, and compliance posture – emphasizing the importance of locating infrastructure domestically.
- The use cases that staking secures on proof-of-stake networks continues to expand.
 - New networks are now increasingly built for specific use cases such as stablecoins, fintech infrastructure, and data availability – as well as non-financial use cases such as digital identity, supply chain management, and physical infrastructure management for telecommunications and decentralized computing.
 - For example, SpruceID, which operates primarily on Ethereum, has launched digital identity pilots with the California Department of Motor Vehicles, the Utah Department of Government Operations, and the federal Department of Homeland Security.⁶⁹

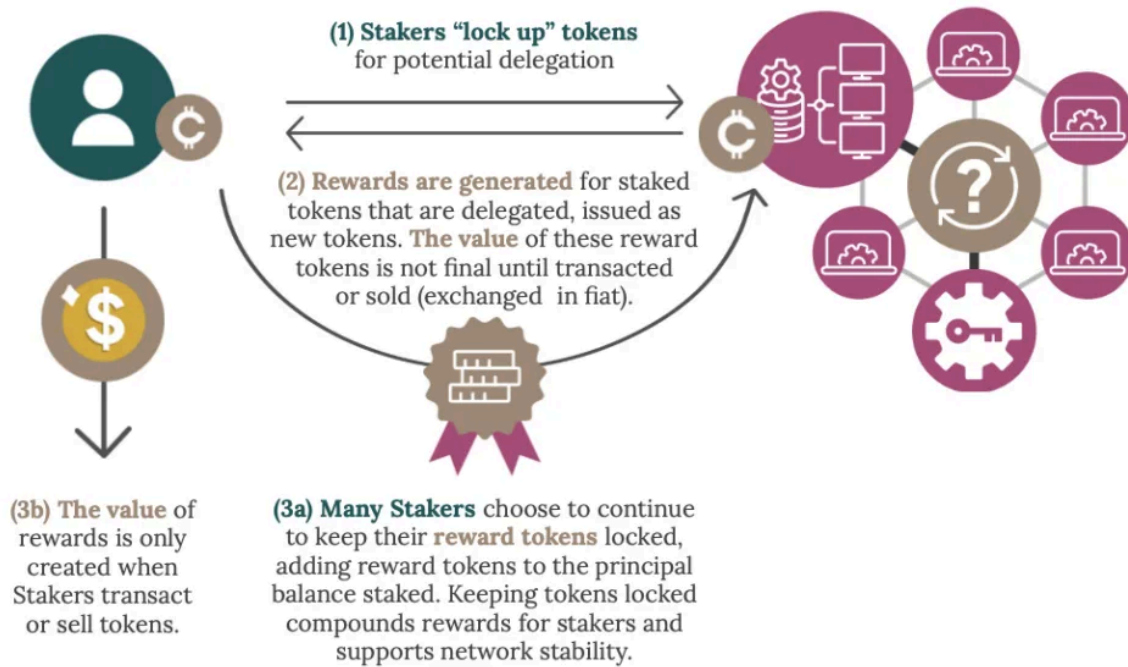
⁶⁷ Everstake, "The Next Chapter for Crypto: 2025 Review & 2026 Outlook," December 2025. Available at: <https://everstake.one/resources/blog/the-next-chapter-for-crypto-market-analysis-of-2025-and-expectations-for-2026> (December 15, 2025). Note that \$700 billion refers to the approximate value of the top 35 proof-of-stake networks; the total value inclusive of smaller proof-of-stake networks is likely larger.

⁶⁸ Aggregated data on the total number of U.S. citizens and residents is not publicly available, and 1099-MISC reportable income from staking is not isolated from aggregated "Other income." See UNITED STATES SECURITIES AND EXCHANGE COMMISSION FORM 10-K: Coinbase Global, Inc. for the Fiscal Year Ended December 31, 2023, Securities and Exchange Commission, <https://www.sec.gov/Archives/edgar/data/1679788/000167978824000022/coin-20231231.htm>; and UNITED STATES SECURITIES AND EXCHANGE COMMISSION FORM 10-K: Coinbase Global, Inc. for the Fiscal Year Ended December 31, 2024, Securities and Exchange Commission, <https://www.sec.gov/Archives/edgar/data/1679788/000167978825000022/coin-20241231.htm>.

⁶⁹ SpruceID, "Success Stories," Website. Available at: <https://blog.spruceid.com/spruceid-partners-with-ca-dmv-on-mdl/>

- Because blockchains are decentralized, validator infrastructure may be located anywhere in the world.
- Under current guidance, tax advisors treat staking income as sourced to wherever the validator infrastructure is physically located—similar to how cloud computing income is sourced.
- The consequence: foreign investors who stake through U.S. service providers may face a 30% withholding tax simply because a validator node is based in the United States. This creates a direct competitive disadvantage for U.S.-based staking infrastructure.





Source: CCI

- **Tax treatment is already driving staking infrastructure and activity offshore.**
 - CCI's membership represents key industry leaders, who report⁷¹:
 - Staking providers report that their clients are requiring validation from non-U.S. providers to reduce risk in the context of tax policy uncertainty.
 - As a result, many industry leaders report that a majority of their validators are located outside of the United States, with a growing share located in other jurisdictions.
 - Industry leaders are making significant investments in infrastructure and talent outside of the U.S. to service validator infrastructure in other jurisdictions – investments that could be happening onshore.

⁷¹ Crypto Council for Innovation, "Staking Tax Considerations." Available at: <https://cryptoforinnovation.org/wp-content/uploads/2026/03/V2-Staking-Tax-Issues-Leave-Behind.pdf>

- Proof-of-stake networks rely on stakers and validators whose distinct economic roles are poorly served by current U.S. tax rules—creating compliance burdens and competitive disadvantages for domestic operators.
- Clear policy that treats staking rewards for non-U.S. persons as foreign source income and as taxed as gains only when sold, will help place U.S. staking infrastructure and partners on a level playing field with foreign counterparts.

National Security Implications

- **Movement of industry and talent removes the U.S.'s ability to influence the next generation of financial and digital infrastructure.**
 - The White House considers reversing the decline of blockchain development in the U.S. as strategically important.⁷²
 - American users will continue to seek out crypto regardless of whether it is regulated or not.
 - When globally significant liquidity pools and intermediaries sit outside the U.S. supervisory perimeter, strategic threats can play out through infrastructure that Washington does not directly regulate.
- **America's adversaries already understand the stakes, seeing blockchain as strategic rather than speculative.**
 - China has invested heavily in blockchain infrastructure through its Blockchain-based Service Network (BSN), which integrates decentralized tools into its Digital Silk Road initiative to achieve first-mover advantage.^{73 74}

⁷² National Economic Council President's Working Group on Digital Asset Markets, "Strengthening American Leadership in Digital Financial Technology," January 23, 2025. Available at: <https://www.whitehouse.gov/wp-content/uploads/2025/07/digital-Assets-Report-EO14178.pdf>

⁷³ Center for Strategic and International Studies, "China's Blockchain Playbook: Infrastructure, Influence, and the New Digital Order," Anoosh Kumar, May 5, 2025. Available at: <https://www.csis.org/blogs/strategic-technologies-blog/chinas-blockchain-playbook-infrastructure-influence-and-new>

⁷⁴ European Union Institute for Security Studies, "China's blockchain and cryptocurrency ambitions," Alice Ekman, July 13, 2021. Available at: <https://www.iss.europa.eu/publications/briefs/chinas-blockchain-and-cryptocurrency-ambitions>

- China has been clear about its intention to leverage its pilot e-CNY (digital yuan)⁷⁵ as part of its geopolitical competition with the U.S,⁷⁶ though success has been mixed.⁷⁷
 - Recently, China has pulled away from mainstream CBDC thinking and as of January 1, 2026, deposits are earning interest.⁷⁸
- **Non-financial crypto use cases that are of strategic importance also require market structure legislation to scale.**
 - A broader class of decentralized technologies—spanning applications such as decentralized physical infrastructure (DePIN), decentralized computing, and decentralized digital identity (DID)—may hold the keys to protecting American networks, data, and economic competitiveness.
 - By distributing computing power, storage, and connectivity across networks, decentralized technologies limit the “attack surface” available to adversaries. They also reduce reliance on foreign-controlled infrastructure, particularly in semiconductors and cloud computing, where U.S. supply chains are dangerously exposed to its adversaries.⁷⁹
 - Such resources are critical to the United States’ effort to achieve Artificial Intelligence dominance.⁸⁰ For example, decentralized computing platforms pool underutilized GPUs across global networks,

⁷⁵ Forbes, “A 2025 Overview Of The E-CNY, China’s Digital Yuan,” Roger Huang, March 6, 2025.

Available at:

<https://www.forbes.com/sites/digital-assets/2024/07/15/a-2024-overview-of-the-e-cny-chinas-digital-yuan/>

⁷⁶ CNBC, “China doubles down on promoting yuan as confidence in U.S. dollar takes a beating,” Lee Ying Shan and Evelyn Cheng, June 24, 2025. Available at:

<https://www.cnbc.com/2025/06/25/china-promotes-yuan-as-dollar-confidence-falters.html>

⁷⁷ Peterson Institute for International Economics (PIIE), “China gives up on state-backed digital cash: The US and Europe should take note—for different reasons,” Martin Chorzempa, February 10, 2026.

Available at:

<https://www.piie.com/blogs/realtime-economics/2026/china-gives-state-backed-digital-cash-us-and-europe-should-take-note>

⁷⁸ Yahoo! Finance, “China Breaks CBDC Orthodoxy: Digital Yuan to Pay Interest Starting 2026,” Oihyun Kim, December 31, 2025. Available at:

<https://finance.yahoo.com/news/china-breaks-cbdc-orthodoxy-digital-050942170.html>

⁷⁹ RAND, “Full Stack: China’s Evolving Industrial Policy for AI,” Kyle Chan, Gregory Smith, Jimmy Goodrich, Gerard DiPippo, Konstantin F. Pilz, June 26, 2025 Available at:

<https://www.rand.org/pubs/perspectives/PEA4012-1.html>

⁸⁰ RAND, “AI’s Power Requirements Under Exponential Growth,” Konstantin F. Pilz, Yusuf Mahmood, Lennart Heim, January 28, 2025. Available at:

https://www.rand.org/pubs/research_reports/RRA3572-1.html

enabling access to AI training capacity that is otherwise controlled by a handful of large firms.^{81 82}

- The Department of Commerce’s recent notice of proposed rulemaking on compute exports recognizes that AI compute capacity is now a matter of national security. If centralized GPU supply chains are a vulnerability, then decentralized alternatives are part of the solution.⁸³

Repatriation to U.S. Due to More Supportive Regulatory Momentum

The shift in U.S. regulatory posture since late 2024 (including the passage of the GENIUS Act and growing momentum toward the CLARITY Act) has triggered a measurable wave of companies and foundations moving operations back onshore.

This activity represents the economic activity the CLARITY Act is designed to accelerate. However, this progress is early, with all CEOs citing movement as conditional on continued momentum. Key developments include:

- **Jito Foundation:**
 - The Jito Foundation, which builds MEV (maximal extractable value) infrastructure for Solana and secures approximately \$1.85 billion in TVL, announced in December 2025 that it was re-establishing core operations in the United States.⁸⁴
 - The announcement came after passage of the GENIUS Act and ongoing work toward a market structure bill, which Jito's CEO Lucas Bruder cited as the turning point.⁸⁵

⁸¹ Reflexivity Research, “Overview of Decentralized Compute.” Available at: <https://www.reflexivityresearch.com/free-reports/overview-of-decentralized-compute#:~:text=A%20pivotal%20advantage%20of%20decentralized,playing%20field%20for%20AI%20development.>

⁸² IEEE, “The AI Boom Is Giving Rise to “GPU-as-a-Service,” Juan Pablo Perez, January 20, 2025. Available at: <https://spectrum.ieee.org/gpu-as-a-service>

⁸³ National Archives: Federal Register, “Taking Additional Steps To Address the National Emergency With Respect to Significant Malicious Cyber-Enabled Activities,” Bureau of Industry and Security, Department of Commerce, January 29, 2024. Available at: <https://www.federalregister.gov/documents/2024/01/29/2024-01580/taking-additional-steps-to-address-the-national-emergency-with-respect-to-significant-malicious>

⁸⁴ Jito Blog, “The Jito Foundation Comes Home,” December 17, 2025. Available at: <https://www.jito.network/blog/the-jito-foundation-comes-home/>

⁸⁵ The Crypto Times, “Jito Foundation Moves Core Operations Back to US Amid Regulatory Shift,” Gopal Solanky, December 17, 2025. Available at:

- Jito's CEO Lucas Bruder stated that the foundation had been forced offshore because "banks wouldn't service us, vendors wouldn't contract with us, and every product decision carried real but unquantifiable legal risk from a hostile and capricious regulatory agency gone rogue."
- **OKX:**
 - The world's second-largest exchange by derivatives volume formally redomiciled its headquarters to San Jose, California in April 2025.
 - OKX launched a centralized exchange and Web3 wallet for American users, and appointed Roshan Robert (a former Barclays investment bank director) as its new U.S. CEO, explicitly citing the move as part of a strategy to "recruit top-tier talent, foster cutting-edge product development, and expand its presence in the world's largest financial market."⁸⁶
 - OKX's U.S. team has expanded to approximately 500 employees across New York, San Francisco, and San Jose, and the company added 300+ compliance hires globally in 2024 alone.⁸⁷
 - OKX had previously settled with the DOJ for over \$500 million for operating in the U.S. without a money transmitting license – making its return a notable signal that the compliance pathway now exists in a way it did not before.⁸⁸
- **CoinList:**
 - A token launch and sale platform that had excluded U.S. investors entirely since 2019 due to SEC enforcement risk, CoinList officially reopened access to American investors in 2025.
 - CoinList launched a new token sale product for U.S. accredited investors, stating: "American investors were once at the center of compliant token

<https://www.cryptotimes.io/2025/12/18/jito-foundation-moves-core-operations-back-to-us-ami-d-regulatory-shift/>

⁸⁶ PR Newswire, "OKX Accelerates US Expansion with Crypto Exchange, Web3 Wallet, and New US CEO," OKX, April 15, 2025. Available at:

<https://www.prnewswire.com/news-releases/okx-accelerates-us-expansion-with-crypto-exchange-web3-wallet-and-new-us-ceo-302429748.html>

⁸⁷ CoinLaw, "How Many People Work At OKX 2026: Inside Its Global Team Growth," Barry Elad and Kathleen Kinder, November 11, 2025. Available at:

<https://coinlaw.io/how-many-people-work-at-okx/>

⁸⁸ United States Attorney's Office: Southern District of New York, "OKX Pleads Guilty To Violating U.S. Anti-Money Laundering Laws And Agrees To Pay Penalties Totaling More Than \$500 Million," February 24, 2025. Available at:

<https://www.justice.gov/usao-sdny/pr/okx-pleads-guilty-violating-us-anti-money-laundering-law-s-and-agrees-pay-penalties>

sales, but since 2019 they've been shut out of early access to many of the industry's most important projects, even as the global crypto market cap (ex-BTC) grew 18x."⁸⁹

⁸⁹ CoinList, "CoinList 2025: Year in Review," December 22, 2025. Available at: <https://blog.coinlist.co/coinlist-2025-year-in-review/>