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# The Complete Stablecoin Regulatory Map: Every Jurisdiction, Every Standard, Every Gap

Seven jurisdictions now have live stablecoin frameworks. This is the practitioner's field guide to every reserve requirement, attestation standard, licensing path, and cross-border conflict that governs stablecoin issuance in 2026.

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Jurisdictions with live stablecoin frameworks, and no equivalence agreement reconciles any two of them.

When Congress signed the GENIUS Act on July 18, 2025, the stablecoin industry celebrated regulatory clarity. What it actually got was one more framework in a world that already had six.

The GENIUS Act is well-designed legislation. Its reserve requirements are conservative, its attestation requirements are specific, and its bankruptcy protections are genuine. But it was written for the American market, and stablecoins do not respect borders. USDC circulates on twenty-plus chains across every jurisdiction on earth. The question that matters is not "what does the GENIUS Act require?" but rather "what do seven frameworks require simultaneously, and where do they conflict?"

This is the complete map. Not the summary. The detail that a compliance officer, a CPA performing reserve examinations, or an issuer's general counsel actually needs to do the work.

## Part I: The United States

### The GENIUS Act

The Guiding and Establishing National Innovation for U.S. Stablecoins Act (S.1582) passed the Senate 68-30 on June 17, 2025, the House 308-122 on July 17, and was signed into law on July 18. Implementing regulations from six federal agencies (OCC, FDIC, NCUA, Treasury, FinCEN, OFAC) are due by July 18, 2026, with the framework effective 120 days later, approximately mid-November 2026. If agencies miss the deadline, the framework takes effect no later than January 18, 2027.

### Eligible Reserve Assets

Section 4(a)(1)(A) enumerates a closed list of six categories. This list is exclusive. Anything not on it is prohibited:

- Physical U.S. coins and Federal Reserve notes (cash)
- Demand deposits at FDIC-insured depository institutions
- U.S. Treasury bills, notes, or bonds with remaining maturities of 93 days or less
- Repurchase agreements backed by qualifying Treasury securities with terms no longer than 7 days, collateralized by Treasury bills with maturities of 90 days or less
- Shares in SEC-registered government money market funds (Rule 2a-7) investing solely in the above asset types

Other similarly liquid federal government assets approved by the primary regulator, plus tokenized forms of the foregoing

The exclusions matter more than the inclusions. Commercial paper is out. Certificates of deposit beyond insured deposit limits are out. Longer-duration Treasuries (anything over 93 days) are out. Corporate bonds, repos backed by non-Treasuries, foreign sovereign debt, gold, real estate, and digital assets are all excluded. Reserves may not be pledged, rehypothecated, or reused except in narrow circumstances (margin obligations, custodial services, or redemption liquidity), and must be held in separate, bankruptcy-remote accounts.

Any issuer's published reserve reports can be read directly against the Section 4(a)(1)(A) list above; the statute leaves no discretionary category to argue about.

### Attestation Requirements

The attestation standard is the most specific in any global jurisdiction. Monthly attestation by a PCAOB-registered public accounting firm. CEO and CFO must personally certify accuracy of reserve disclosures under criminal penalty. The statute references 18 U.S.C. Section 1350(c), creating personal liability comparable to Sarbanes-Oxley Section 906 criminal certification. For issuers with more than $50 billion in outstanding stablecoins, annual U.S. GAAP-compliant financial statements audited under PCAOB auditing standards are additionally required.

The practical effect is significant. An external public accounting firm is embedded in the issuer's monthly close cycle permanently. This is not a quarterly exercise or an annual review. It is a monthly engagement that produces a public opinion on the adequacy of reserves, signed by a PCAOB-registered firm, backed by criminal certification from the C-suite.

### Licensing Paths and the $10B Threshold

Three categories of permitted payment stablecoin issuer exist under the Act:

**Subsidiary of an insured depository institution.** A bank or credit union subsidiary. SoFi Bank's SoFiUSD (launched May 2026, attested by Deloitte) follows this path. Reserves held at the Federal Reserve Bank of San Francisco.

**Federal-qualified nonbank payment stablecoin issuer.** Supervised by the OCC. The OCC conditionally approved five national trust bank charter applications on December 12, 2025: Circle (First National Digital Currency Bank), Ripple (Ripple National Trust Bank), Paxos (converting from state trust company), Fidelity Digital Assets, and BitGo Bank & Trust. Circle received final OCC approval on July 10, 2026. Six additional applications were pending as of early 2026, including Coinbase, Crypto.com (Foris DAX National Trust Bank), and Stripe's Bridge affiliate.

**State-qualified payment stablecoin issuer.** Supervised by state regulators, but only below the $10 billion threshold. This threshold is a hard gate. Upon exceeding $10 billion in outstanding stablecoins, the issuer must: (a) notify the OCC within five business days, (b) complete a capital analysis within 270 days and transition to OCC oversight within 360 days, OR (c) receive an OCC waiver, OR (d) cease issuing new stablecoins until circulation drops below $10 billion.

### The OCC's Proposed Implementing Rule

The 376-page proposed rule (12 CFR Part 15, published February 2026, comment period closed May 1, 2026) adds operational specificity the statute does not provide:

**Capital.** $5 million minimum floor during a three-year "de novo period," with OCC authority to impose higher individualized requirements based on projected issuance volume and risk profile.

**Liquidity.** A three-tier structure. Tier 1: at least 10% of outstanding stablecoins redeemable same business day in Federal Reserve deposits or cash equivalents. Tier 2: at least 30% redeemable within five business days in high-quality liquid assets. Tier 3: at least 60% in standard qualifying assets. Two consecutive quarters of shortfalls in this backstop trigger mandatory wind-down proceedings.

**Wind-down reserve.** Issuers must maintain a designated pool of highly liquid assets sufficient to fund 12 months of total operating expenses, held separately from reserve assets. The primary federal regulators are required to conduct a study of insolvency proceedings with results published within three years of enactment (by July 2028).

### Yield Prohibition

Section 4(a)(11) prohibits issuers from paying holders any form of interest or yield, in cash, tokens, or other consideration, solely in connection with holding, using, or retaining payment stablecoins. The OCC's proposed rule extends this to affiliates and third parties, creating a rebuttable presumption that coordinated yield arrangements are evasive. This closes the "rewards program" loophole where an issuer's affiliate pays yield that the issuer itself cannot.

This is a deliberate policy choice. Congress did not want a product that competes with bank deposits for consumer savings while operating outside the deposit insurance framework. The prohibition has no sunset clause.

## Bankruptcy Priority: The Fine Print

The Act amends Title 11 (Bankruptcy Code) to declare that reserve assets are not property of the bankruptcy estate. An expedited procedure allows holders to seek relief from the automatic stay, with the bankruptcy court required to begin distributions within 14 days.

The protection looks strong on paper but has structural weaknesses identified by Georgetown Law professor Adam Levitin. Holders actually rank fifth in practical distribution priority, behind: (1) repo and margin lender claims (secured under Section 725), (2) debtor-in-possession lender claims, (3) professional fee carve-outs, and (4) set-off claims from depositaries and brokers. The statutory priority addresses unsecured claims under Section 726, but secured claims are paid first, potentially consuming substantial reserve value before holders see distributions.

## Foreign Issuer Restrictions

The Act creates a permitted-issuer regime. Foreign issuers seeking U.S. market access face separate equivalence determinations from Treasury. Tether responded by launching USA(T) on January 27, 2026, issued through Anchorage Digital Bank (the first OCC-chartered crypto bank). As of mid-2026, Treasury has not issued a reciprocity determination for Tether's offshore USDT operations.

## BSA/AML Requirements

Permitted payment stablecoin issuers are treated as financial institutions under the Bank Secrecy Act, subject to AML/CFT programs, OFAC sanctions screening, customer identification and due diligence, and suspicious activity reporting. FinCEN and OCC published a joint proposed rulemaking in the Federal Register on April 10, 2026. A supplemental OCC bulletin (Bulletin 2026-28, June 24, 2026) established the consultation framework between OCC and FinCEN for enforcement actions.

## State Money Transmitter Laws

The GENIUS Act preempts state money transmitter licensing only for permitted payment stablecoin issuers, and only for their stablecoin issuance activity. This preemption is narrow and activity-specific.

Exchanges, custodians, and intermediaries that transmit stablecoins but are not issuers still need state MTLs in up to 49 jurisdictions. Montana is the sole state with no MTL requirement.

An issuer seeking nationwide coverage before obtaining PPSI status (or for non-issuance activities) needs licenses in approximately 48 to 53 jurisdictions.

State bonding requirements range from $25,000 to several million dollars depending on jurisdiction and transaction volume. These stack on top of federal reserve requirements. Both federal and state regulators retain examination authority, creating the possibility of simultaneous OCC and state examinations with different scopes, timelines, and potentially conflicting conclusions about the same facts.

Four states have adopted the Money Transmission Modernization Act (MTMA) as of August 2026: Mississippi (July 1, 2025), Colorado (July 17, 2025), Nebraska (October 1, 2025), and Virginia (July 1, 2026). Wyoming offers a Special Purpose Depository Institution charter with a $5 million capital requirement. No state has yet received "substantially similar" certification from the SCRC that would reduce the federal-state duplication.

### NYDFS: The Template Congress Built On

The New York Department of Financial Services issued stablecoin-specific guidance on June 8, 2022, three years before the GENIUS Act. This guidance applies to entities licensed under the BitLicense regulation (23 NYCRR Part 200) or chartered as limited-purpose trust companies under New York Banking Law.

Core requirements: full 1:1 backing with market value of reserves equaling or exceeding nominal value of outstanding stablecoins as of end of each business day. Eligible assets: U.S. Treasury bills, reverse repurchase agreements fully collateralized by Treasury bills, government money market funds, and deposits at U.S.-chartered depository institutions. Segregation from proprietary assets. Monthly independent CPA attestation. Clear redemption policies.

The GENIUS Act is stricter on attestation: PCAOB registration and CEO/CFO criminal certification, which NYDFS does not require. NYDFS is stricter on enforcement: it fined Paxos $26.5 million in August 2025 for BSA/AML compliance failures tied to the Binance/BUSD relationship. The NYDFS Greenlist (updated November 2023) pre-approves specific stablecoins for listing by licensed entities, including USDC, GUSD, PYUSD, and RLUSD.

### The IRS Gap

The GENIUS Act treats stablecoins as payment instruments. The IRS treats them as property under Notice 2014-21. No provision in the GENIUS Act directed the IRS to update its classification. These two positions are not reconciled anywhere in the legislation, and the tax committees did not want to cede classification authority to the banking committees.

Every stablecoin transaction is a taxable event requiring cost basis tracking and gain/loss calculation, even when the economic gain is zero. A business paying a vendor in USDC must calculate capital gain/loss on each transaction. A freelancer receiving USDC creates two taxable events: receipt as income and conversion as property disposition.

The PARITY Act (introduced May 19, 2026) proposes a peg stability safe harbor for stablecoins issued by a GENIUS Act-compliant entity and acquired within 1% of $1.00, exempting these transactions from capital gains calculations. The Act has not passed. The wash sale extension to digital assets and mark-to-market accounting for qualified traders are also part of the PARITY Act package.

Starting with the 2026 tax year, Form 1099-DA requires brokers to report gross proceeds, cost basis, acquisition and disposition dates, holding period, and transaction details for digital asset sales. This is the first year of mandatory broker reporting under the final Treasury/IRS regulations.

### SEC Position

The SEC Division of Corporation Finance issued a staff statement on April 4, 2025, concluding that "Covered Stablecoins" (USD-backed, fully reserved, non-yield-bearing stablecoins) do not involve the offer or sale of securities. This followed the July 2024 termination of the SEC's enforcement investigation into Paxos regarding BUSD, affirming that stablecoins redeemable 1:1 with full reserves fail the Howey test because holders have no expectation of profit from the efforts of others.

Circle's Reserve Fund (USDXX) is an SEC-registered Rule 2a-7 government money market fund managed by BlackRock, custodied at BNY Mellon (CUSIP 09261A870). The fund invests at least 99.5% of total assets in cash, U.S. Treasury bills and notes, and Treasury-collateralized reverse repos. Weighted-average maturity under 60 days. Approximately 80% or more of USDC reserves sit in this fund. Circle completed its IPO, making it a public reporting company with quarterly 10-Q and annual 10-K filings.

## Part II: The European Union (MiCA)

Regulation (EU) 2023/1114, the Markets in Crypto-Assets Regulation, took full effect with the July 1, 2026 transitional deadline. After that date, any entity providing crypto-asset services to EU clients without a MiCA license is in breach of EU law. ESMA confirmed no extensions.

## EMT vs. ART Classification

MiCA creates two stablecoin categories under Titles III and IV. E-Money Tokens (EMTs) reference a single official fiat currency and require an existing EMI or credit institution license plus notification to the home national competent authority with a compliant crypto-asset white paper. Asset-Referenced Tokens (ARTs) reference a basket of currencies, commodities, or other crypto-assets and require standalone NCA authorization, typically taking 6 to 12 months.

As of Q1 2026, approximately 19 EMT issuers are authorized across 11 EU countries, issuing 29 tokens. Zero standalone ARTs have been authorized. Active NCAs processing applications include the AMF (France), BaFin (Germany), MFSA (Malta), AFM (Netherlands), and FIN-FSA (Finland).

## Reserve Composition: The Core Divergence

Under Article 36, all EMT issuers must hold reserves equal to or exceeding the value of tokens in circulation, segregated from the issuer's own assets. For non-significant EMTs, at least 30% must be held as deposits at EU credit institutions. For significant EMTs (designated by the EBA under Article 43 criteria: more than 10 million holders, outstanding issuance exceeding EUR 5 billion, or more than 2.5 million transactions per day), the floor rises to 60% in credit institution deposits. The EBA's regulatory technical standards impose concentration limits: no more than 25% at a single credit institution for non-significant tokens, dropping to 10% for significant tokens across at least six banks.

This is the structural incompatibility with the GENIUS Act. The GENIUS Act pushes reserves toward the state (Treasuries and the Federal Reserve). MiCA pulls them into the commercial banking sector (deposits). No single reserve portfolio can simultaneously satisfy both frameworks. Circle maintains structurally separate reserve arrangements for its U.S. and EU operations through Circle Mint Europe SAS, authorized as an EMI in France by the ACPR in July 2024.

A significant EMT denominated in a non-EU currency (such as USD-pegged USDC) faces a hard transaction cap: 1 million transactions per day or EUR 200 million per day in transaction volume when used as a means of exchange within the EU. This cap has no equivalent in U.S. law.

### Tether's Exit and Circle's Near-Monopoly

Tether chose not to seek MiCA authorization for USDT, citing fundamental incompatibility between MiCA's 60% bank deposit requirement and Tether's model (approximately 80 to 83% in short-dated U.S. Treasuries). Tether discontinued EURT in 2024, with a final redemption deadline of November 27, 2025. Cascading delistings followed: Coinbase removed USDT for EEA users (December 2024), Crypto.com (January 2025), Binance restricted EEA spot trading (March 2025), Kraken (March 2025).

The result: Circle holds a near-monopoly position in the EU stablecoin market. On July 9, 2026, the European Commission launched a consultation (open until September 30, 2026) examining whether to reopen MiCA's stablecoin provisions. Patrick Hansen (Circle's head of EU policy) has proposed an "equivalence" mechanism that would allow the EU to recognize home-country rules of foreign stablecoin issuers. No such mechanism exists today.

Confirmed MiCA-authorized issuers include: Circle (USDC, EURC, EMI in France), SG-Forge/Societe Generale (EURCV, USDCV, credit institution/EMI with ACPR), Quantoz Payments (EURQ, USDQ, EMI from DNB Netherlands, 102% overcollateralized), Membrane Finance (EUROe, EMI from FIN-FSA Finland), Banking Circle (EURI, credit institution from CSSF Luxembourg, attested by Ernst & Young), and StablR (EURR, USDR, EMI from MFSA Malta).

## Part III: Singapore (MAS SCS Framework)

The Monetary Authority of Singapore finalized its Single-Currency Stablecoin framework on August 15, 2023. It applies only to single-currency stablecoins pegged to the Singapore dollar or a G10 currency issued in Singapore.

**Licensing.** Major Payment Institution license under the Payment Services Act 2019, specifically covering "e-money issuance." The MPI threshold applies when outstanding stablecoins exceed S$5 million.

**Reserves.** 100% backing in cash, cash equivalents, or debt securities with remaining maturity of three months or less issued by a government or central bank of the peg currency. Assets must be segregated and held with MAS-approved custodians. Monthly independent checks and annual audits required.

**Capital.** Minimum S$1 million or 50% of annual operating expenses, whichever is higher, plus sufficient liquid assets for orderly wind-down.

**Redemption.** Par value within five business days. This is notably more generous than the GENIUS Act's implied on-demand standard.

**The "MAS-regulated" label.** Only issuers fulfilling all SCS requirements can apply for MAS to recognize and label their tokens as "MAS-regulated stablecoins," functioning as a regulatory quality mark. StraitsX (XSGD) was the first acknowledged as substantively compliant. Paxos Digital Singapore operates USDG under an MPI license with reserves managed by DBS Bank.

Singapore's approach is principles-based where the GENIUS Act is rules-based. MAS specifies reserve quality without enumerating a closed list of eligible assets. The three-month maturity limit for sovereign debt is slightly more restrictive than the GENIUS Act's 93 days. No explicit yield prohibition exists, though reserve and redemption requirements effectively constrain distribution.

## Part IV: Japan (FSA Payment Services Act)

Japan classifies fiat-pegged stablecoins as "electronic payment instruments" under the revised Payment Services Act. The three-tiered issuer model: commercial banks, trust companies, and licensed fund transfer service providers.

**JPYC Inc.** obtained a Type II funds transfer business license, becoming the first fully regulated yen-pegged stablecoin issuer (launched October 2025, FSA designation confirmed April 2026). The Type II license carries a per-transaction cap of JPY 1 million (approximately $6,500), limiting it to retail and small-business payments. Cumulative issuance exceeded 2.1 billion yen as of April 2026.

**Trust bank structures.** SBI Holdings and Startale Group developed JPYSC through SBI Shinsei Trust Bank. Trust-issued stablecoins carry no transaction cap and benefit from bankruptcy-remote structures. A 2025 amendment allowed trust issuers to place up to 50% of backing assets in short-term Japanese Government Bonds; the remainder must be in bank deposits.

**Foreign stablecoin pathway.** Effective June 1, 2026, amended Cabinet Office Ordinances create a compliant pathway for foreign trust-type stablecoins. SBI VC Trade became the first intermediary licensed for USDC distribution (March 2025). Foreign issuers must demonstrate home-jurisdiction equivalence in licensing, auditing, AML controls, and reserve backing.

**Project Pax.** Japan's three megabanks (MUFG, SMBC, Mizuho) are jointly developing a yen-pegged stablecoin on the Progmat platform, targeting one trillion yen (approximately $6.5

billion) in B2B volume by 2028 across 300,000+ enterprise clients. A USD-denominated version is planned to follow.

## Part V: United Kingdom

The UK adopted a two-tier approach confirmed in a joint Bank of England/FCA paper on June 30, 2026. The FCA will regulate all UK-issued qualifying stablecoins from October 25, 2027. Where HM Treasury designates a stablecoin as systemic, the Bank of England assumes additional prudential oversight.

**Systemic stablecoin reserves.** The BoE's draft Code of Practice (June 22, 2026, consultation closes September 22, 2026) requires at least 70% of reserves in short-term UK government debt (gilts), with a step-up approach allowing up to 95%. The remainder must be in unremunerated central bank deposits (minimum 5%). A financial-risk reserve covering market risk and liquidation price impact must equal at least the Sterling Monetary Framework haircuts, currently 0.5% of fair value. Capital requirements mirror Common Equity Tier 1: the greater of six months' operating expenses or the cost of recovering from the largest plausible loss event.

**Issuance cap.** GBP 40 billion total per systemic coin. The BoE dropped per-user holding limits from earlier consultations.

**Status.** As of August 2026, no stablecoin issuer has been authorized under the UK framework. The FCA regime does not open for applications until October 2027, placing the UK approximately two years behind MiCA's full enforcement.

The UK's reserve composition is the most government-debt-oriented of any jurisdiction (70 to 95% in gilts) compared to MiCA's bank-deposit focus. The UK does not impose transaction volume caps like MiCA's limits on significant non-EUR EMTs. The framework is silent on yield prohibition.

## Part VI: UAE (Four Regulators)

The UAE has four distinct regulatory authorities governing stablecoins:

**CBUAE** (Central Bank): exclusive regulator for AED-pegged payment tokens. All other regulators defer to CBUAE for AED-referenced tokens. In January 2026, CBUAE granted in-principle approval to RAKBANK for the first conventional bank AED payment token.

**VARA** (Dubai mainland): regulates non-AED stablecoins as "Fiat-Referenced Virtual Assets." Published an ARVA framework in 2026 setting reserve, governance, and disclosure requirements.

**ADGM** (Abu Dhabi): the FSRA finalized its fiat-referenced token rulebook effective January 1, 2026. Paxos received FSRA approval for USDL (Lift Dollar) in June 2024 but ceased minting by October 2025. Circle holds an ADGM FSP license.

**DFSA** (DIFC): implemented amendments effective January 12, 2026 eliminating the prescriptive "Recognised Crypto Tokens" list. Regulated firms within DIFC now assess token suitability themselves.

An issuer of a UAE stablecoin navigates potentially four regulators depending on the token's peg currency and the geographic zone of their entity.

## Part VII: Hong Kong (HKMA Stablecoins Ordinance)

The Stablecoins Ordinance took effect August 1, 2025. The HKMA granted Hong Kong's first two stablecoin issuer licenses on April 10, 2026, out of 36 formal applications (5.6% approval rate):

**HSBC**, planning a HKD-denominated stablecoin in H2 2026, backed by high-quality liquid assets in segregated accounts, initially for peer-to-peer payments via HSBC Mobile Banking and PayMe.

**Anchorpoint Financial Limited** (Standard Chartered / HKT / Animoca Brands joint venture), planning phased rollout of the HKDAP stablecoin for cross-border payments, local payments, tokenized asset settlement, and supply chain financing.

Requirements: minimum HK$25 million capital (approximately US$3.2 million), 100% reserve backing in high-quality liquid assets, segregation, prompt par redemption, AML/CFT compliance, and local presence.

## Part VIII: Bermuda (BMA DABA)

Bermuda's Digital Asset Business Act provides DABA licensing, with SCPS (Single Currency Pegged Stablecoin) guidance published November 2024. The guidance covers governance, full reserve backing, independent monthly attestation (Big Four firm expected), redemption rights, stress testing, bankruptcy remoteness, and mandatory wind-down plans. Operating without a license is a criminal offense punishable by up to $250,000 and/or five years imprisonment.

Mountain Protocol operated USDM under a DABA Class M license before Anchorage Digital acquired it and initiated a wind-down in May 2025. The three-phase exit (active rewards through June 11, primary market closure by August 22, remaining reserves deposited to a Uniswap pool) illustrates both the flexibility and fragility of the Bermuda model.

## Part IX: The Attestation Standards Gap

The professional standards governing stablecoin assurance are not harmonized across jurisdictions. This gap matters as much as the reserve composition conflicts.

### AT-C 205 (U.S. Examination)

The GENIUS Act requires examination-level attestation under AICPA AT-C Section 205. This is the highest assurance tier available. The practitioner plans the engagement, assesses risks, obtains sufficient appropriate evidence, evaluates reliability of management's assertions, and expresses an affirmative opinion: "In our opinion, management's assertion is fairly stated, in all material respects."

The engagement scope is specific. Management writes an assertion (typically: "As of [date], the fair value of assets held in the Reserve Account was equal to or greater than the amount of [token] in circulation"). The practitioner tests this assertion against evidence: bank statements, custodian confirmations, Treasury holdings records, on-chain supply verification.

### ISAE 3000 (Revised) vs. AT-C

ISAE 3000 (Revised), issued by the IAASB, covers assurance engagements on subject matters other than historical financial information. It distinguishes between reasonable assurance (comparable to AT-C 205 examination) and limited assurance (comparable to AT-C 210 review).

The distinction that matters when reading any report under this family: a reasonable-assurance engagement ends in an opinion or conclusion on the subject matter, while an agreed-upon-procedures engagement (ISRS 4400) reports factual findings and expresses no opinion at all. A report's title does not settle which one it is; the presence or absence of an opinion paragraph does. The difference between an examination-level opinion and a findings-only report is substantial in professional terms, even though both get called "attestations" in the press.

### PCAOB Registration

The GENIUS Act requires the attestation practitioner to be PCAOB-registered. This is notable because PCAOB registration is historically tied to audits of public companies and broker-dealers, not private-entity attestation engagements. The AICPA raised concerns in May 2026 about potential bottleneck effects.

### Practitioner Transitions

The stablecoin attestation market has seen rapid turnover signaling market maturation:

**Tether**: Friedman LLP (2017-2018, later merged into Marcum) to Moore Cayman (2021-2022) to MHA Cayman (early 2022, absorbed from Moore) to BDO Italia (mid-2022 to present). KPMG was engaged in March 2026 for Tether's first-ever full financial statement audit. PwC brought in for internal controls.

**Circle**: Grant Thornton LLP (2018-2022) to Deloitte & Touche LLP (2023 to present). The transition coincided with Circle's IPO preparation.

**Paxos**: WithumSmith+Brown (2018 to January 2025) to KPMG LLP (February 2025 to present) for PYUSD, USDP, and PAXG. USDG transitioned from Enrome LLP to Marcum LLP (February 2026).

The Big Four entry (Deloitte for Circle, Ripple, Anchorage/USAT, and SoFi; KPMG for Paxos and Tether's audit) represents an inflection point. The largest accounting firms now accept the engagement risk of stablecoin attestation, which they would not have five years ago.

### AICPA 2025 Criteria

The AICPA published standardized criteria for stablecoin reserve attestation in 2025, organized in two parts. Part I defines three core criteria: Redeemable Tokens Outstanding (correct on-chain supply measurement), Redemption Assets Available (reserve valuation and existence), and Comparison (reserves equal or exceed supply). Part II establishes controls criteria across the token lifecycle, reserve management, vendor oversight, IT controls, and governance.

The OCC's proposed implementing rule references these criteria. Their adoption moves the market toward standardization, reducing the variability in what different practitioners examine and how they report.

## Part X: Cross-Border Conflicts

A global issuer operating in the U.S., EU, and Singapore faces these specific, unresolved contradictions:

**Reserve composition.** The GENIUS Act allows 100% in Treasuries and government MMFs. MiCA requires 60% in diversified bank deposits for significant EMTs. Singapore requires assets denominated in the peg currency with a three-month maturity limit. The UK (when live) will require 70 to 95% in gilts. These are structurally incompatible. No single portfolio satisfies even two of these frameworks simultaneously. Separate, jurisdictionally siloed reserve pools are mandatory.

**Attestation standard.** The GENIUS Act requires monthly PCAOB-registered examination with CEO/CFO criminal certification. MiCA requires monthly reserve composition publication but is less specific about engagement type. Singapore defers to ISCA standards. Japan requires daily reconciliation with frequency varying by license type. A monthly AT-C 205 examination does not automatically satisfy any other jurisdiction's requirements.

**Yield.** Both the GENIUS Act and MiCA prohibit yield payments. Singapore has no explicit prohibition but constrains it through reserve and redemption requirements. Japan's trust structures can theoretically distribute returns. The UK's draft framework is silent on yield. Paxos's USDL (ADGM) was explicitly yield-bearing.

**Licensing.** No jurisdiction recognizes another's stablecoin license. An issuer wanting to operate in the U.S., EU, Singapore, and Japan needs four separate licenses, four separate reserve pools, four separate reporting regimes, and four separate white papers or disclosures.

**Tax.** The U.S. treats stablecoins as property (capital gains on every transaction). The EU generally treats stablecoins as e-money (no capital gains on euro-pegged stablecoins used as payment). Singapore has no capital gains tax. A cross-border payment in USDC triggers different tax obligations depending on the sender's and receiver's jurisdictions.

**Redemption timing.** The GENIUS Act implies on-demand. MiCA treats it as on-demand. Singapore allows five business days. Japan varies by license type. Hong Kong requires "prompt" without specifying a window.

No equivalence mechanism, no mutual recognition agreement, and no reciprocity determination exists between any two of these frameworks as of August 2026.

## Part XI: The Compliance Cost

For a new issuer entering the U.S. market in August 2026:

**Legal and advisory.** $2 to 5 million for charter application, compliance program design, and ongoing regulatory counsel.

**Technology.** $3 to 10 million for reserve management systems, AML/KYC/sanctions screening, redemption processing, cost basis tracking, and 1099-DA reporting infrastructure.

**Initial capital.** $5 million minimum (OCC de novo period), with individualized higher requirements expected based on projected issuance volume.

**Annual ongoing compliance.** $3 to 8 million for monthly attestation ($500K to $2M+ annually for the accounting firm engagement alone), legal counsel, AML operations, OCC/state examinations, and state licensing maintenance.

**State MTL coverage** (if needed for non-issuance activities). $1 to 5 million in surety bonds across 49 jurisdictions, with 18 to 36 months to achieve full nationwide coverage.

**Timeline.** 12 to 36 months from application to first stablecoin issued.

These costs explain the market's consolidation around a small number of large issuers who can amortize compliance overhead across billions in outstanding stablecoins. The GENIUS Act will not democratize stablecoin issuance. It will professionalize it. The compliance floor is high enough that new entrants need either deep pockets, a strategic acquirer pathway, or a niche focus to make the economics work.

## What This Map Means

Three conclusions from the complete picture.

First, no single framework governs stablecoins. The market operates under at least seven live regulatory regimes, with more developing. A global issuer's compliance burden is the union of all applicable frameworks, not the intersection. The strictest requirement in any applicable jurisdiction becomes the effective floor.

Second, the attestation standard is the differentiator. The GENIUS Act's monthly PCAOB-registered examination with criminal CEO/CFO certification is the most demanding assurance standard in any jurisdiction. Issuers who already meet this bar have a structural advantage. Issuers who do not face a compliance gap that is now statutory.

Third, the tax question is unresolved everywhere. The U.S. property classification, the EU's e-money treatment, and Singapore's no-capital-gains approach represent three fundamentally different philosophies about what a stablecoin is for tax purposes. Until these are harmonized, or until the PARITY Act passes in the U.S., cross-border stablecoin payments create unpredictable tax obligations that no amount of regulatory "clarity" on the reserve side can fix.

The map is drawn. The jurisdictions are live. The conflicts are real. The practitioner's job is to navigate them.

## Sources

Every link in the article, spelled out because a printed link is dead otherwise. All accessed on or before 5 August 2026, the date this version's claims were checked against them.

## THIS VERSION

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The live article at https://grantstell.com/research/stablecoin-regulatory-map-2026 is authoritative and may be newer than this document. The code beside this block resolves there.

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