STATE OF NEW HAMPSHIRE



Commission to Study Stable Tokens,

Tokenized Real-World Assets, and Blockchain-based Trusts Frameworks

Final Report

VOLUME II

The Commission's Record

Selected record items

OCTOBER 2026

Submitted pursuant to RSA 383:26, IV

STATE OF NEW HAMPSHIRE

Commission to Study Stable Tokens

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The Commission's Record

Selected record items, in record-number order

ADOPTED OCTOBER 29, 2026

Contents of Volume II: The Commission's Record

Selected items from the Commission's record, in record-number order. The full record is listed in Volume I, Appendix E. Each record item is bookmarked in the PDF; page numbers below refer to this volume ("II-n" at the foot of each page). Meeting videos are not bound; the minutes are the official record.

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Volume II contains only what is needed to preserve the Commission's record: the minutes of all fourteen meetings, the trusts draft language (R-12), and the ABA one-pager cited in §4.4 (R-46).

Items in the record not reproduced in this volume

R-3 Global Blockchain Business Council, presentation to the Commission
Summarized in Volume I, Appendix B; listed in Appendix E

R-4 Wyoming Stable Token Commission, "Wyoming's Digital Frontier"
Summarized in Volume I, Appendix B; listed in Appendix E

R-5 Plume Network, presentation to the Commission
Summarized in Volume I, Appendix B; listed in Appendix E

R-6 "What is a Blockchain" one-pager (March 28, 2025), distributed as reference material
Listed in Appendix E

R-7 Hedera, written submission of Nilmini Rubin, Chief Policy Officer
Summarized in Volume I, Appendix B; listed in Appendix E

R-9 Prof. Seth Oranburg, prepared remarks
Summarized in Volume I, Appendix B; listed in Appendix E

R-10 Ian Huyett, presentation on smart contract-based asset protection trusts
Summarized in Volume I, Appendix B; listed in Appendix E

R-11 Ian Huyett and Brian Quirk, "The Potential of the Blockchain for Asset Protection Planning"
Summarized in Volume I, Appendix B; listed in Appendix E

R-13 The Digital Chamber, Digital State Network presentation
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R-15 Fortris, presentation
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R-16 Hedera, "Network and Asset Control"
Summarized in Volume I, Appendix B; listed in Appendix E

R-18 Anchorage Digital, presentation
Summarized in Volume I, Appendix B; listed in Appendix E

R-19 Ceres Coin, "A New Type of Stablecoin for Government Use"
Summarized in Volume I, Appendix B; listed in Appendix E

R-21 Digital Asset, Canton Network presentation
Summarized in Volume I, Appendix B; listed in Appendix E

R-22 Porcupine Properties, presentation
Summarized in Volume I, Appendix B; listed in Appendix E

R-24 Conference of State Bank Supervisors, "GENIUS Act Implementation Update"
Summarized in Volume I, Appendix B; listed in Appendix E

R-25 BitGo, presentation
Summarized in Volume I, Appendix B; listed in Appendix E

R-27 Chainlink Labs, presentation
Summarized in Volume I, Appendix B; listed in Appendix E

R-28 LayerZero, presentation
Summarized in Volume I, Appendix B; listed in Appendix E

R-30 Transcript of the meeting
Transcript; not reproduced (the minutes, R-29, are the official record)

R-31 Dr. Karen Parker Feld, presentation
Summarized in Volume I, Appendix B; listed in Appendix E

R-32 Chair, "NH Stable Token: Year in Review"
Summarized in Volume I, Appendix B; listed in Appendix E

R-34 Lynq, presentation
Summarized in Volume I, Appendix B; listed in Appendix E

R-35 Hazel Network (Vantage Bank and Custodia Bank), presentation
Summarized in Volume I, Appendix B; listed in Appendix E

R-36 Shawn Main, biography
Summarized in Volume I, Appendix B; listed in Appendix E

R-38 Elliptic, digital assets overview
Summarized in Volume I, Appendix B; listed in Appendix E

R-39 Circle, "GENIUS Act: State/Federal Alignment"
Summarized in Volume I, Appendix B; listed in Appendix E

R-40 "H.R. 3633 Concordance," section-by-section comparison of the Senate Banking Committee's amendment to the CLARITY Act

Summarized in Volume I, Appendix B; listed in Appendix E

R-42 Chainlink Labs, "Agentic Economy"

Summarized in Volume I, Appendix B; listed in Appendix E

R-43 BankChain Alliance, presentation

Summarized in Volume I, Appendix B; listed in Appendix E

R-47 Final Report of the Commission on Cryptocurrencies and Digital Assets

Not reproduced; available at https://www.governor.nh.gov/sites/g/files/ehbemt336/files/inline-documents/sonh/cryptocurrencie-report.pdf

R-48 U.S. Department of the Treasury, Strengthening American Leadership in Digital Financial Technology

Not reproduced; available at https://www.whitehouse.gov/wp-content/uploads/2025/07/Digital-Assets-Report-EO14178.pdf

R-49 OCC, notice of proposed rulemaking implementing the GENIUS Act, 91 FR 10202

Not reproduced; available at https://www.federalregister.gov/documents/2026/03/02/2026-04089/implementing-the-guiding-and-establishing-national-innovation-for-us-stablecoins-act-for-the

R-50 Kenechukwu Anadu, Patrick McCabe, JP Perez-Sangimino, and Nathan Swem, "A Framework for Understanding the Vulnerabilities of New Money-Like Products," Federal Reserve Bank of Boston, SRA 26-01

Not reproduced; available at https://www.bostonfed.org/-/media/Documents/Workingpapers/PDF/2026/SRA2601.pdf

R-51 RWA.io, Tokenized Deposits: The Future of Money

Listed in Appendix E

Stable Token Commission Meeting Minutes

Date: September 17, 2025
Time: 10:05 AM EDT
Location: 1 Granite Place, Concord, NH, Room 22
Called to Order: 10:05 AM by Ammon

Attendees

- Katie Taylor (Secretary of State's Office)
- Michael Moranti (Banking Department)
- Sen. Tara Reardon
- Rep. Jim Kofalt
- Rep. Keith Ammon
- Brandon Garod (Attorney General's Office)

Meeting Summary

1. **Opening and Elections**
    - Meeting called to order at 10:05 AM by Keith Ammon.
    - Unanimous vote to elect Keith Ammon as Chair.
    - Unanimous vote to elect Kofalt as Vice-Chair.
2. **Commission Purpose and Scope**
    - Ammon outlined the commission's focus: studying stable tokens, tokenized real-world assets (RWA), and blockchain-based trusts.
    - Commission website: nh-token-commission.org.
3. **Discussion Points**
    - **Brandon Garod**: Suggested scheduling an overview of basic concepts related to stable tokens and blockchain technologies for a future meeting to ensure all members have a foundational understanding.
    - **Jim Kofalt**: Sought clarification on the commission's goals—whether to develop a framework for regulatory control or to explore a state-issued stable token model, such as Wyoming's.

- **Keith Ammon**: Envisioned a comprehensive approach, incorporating both regulatory and innovative aspects, with further details to be discussed.

4. **Public Questions**
    - **Sandra O'Neil (Shaheen Phinney)**: Inquired whether the commission would address tax implications of stable tokens and tokenized assets.
        - **Ammon**: Confirmed that tax implications, including handling profits, will need to be considered.
        - **Kofalt**: Noted that tax policy is largely federal but emphasized the need to evaluate state-specific taxes, such as real estate transfer taxes, in the context of asset transfers involving tokenized assets.
5. **Agenda and Administrative Matters**
    - **Brandon Garod**: Highlighted that the statute provides a solid framework for the commission's work.
    - **Ammon**: Reported that a clerk has been requested from the Governor's office for commission appointees, with recent follow-up.
    - **Kofalt**: Volunteered to coordinate with the Speaker's office to explore options for remote testimony, including procedural and technological requirements.
6. **Next Steps**
    - The next meeting (October 15th at 10 AM) will include an overview of key blockchain concepts (stable tokens, tokenized RWAs, and blockchain-based trusts).
    - Further discussion on regulatory frameworks, state-issued stable token models, and tax implications to be scheduled.

Adjournment: 10:40 AM
Next Meeting: October 15th at 10 AM; will include overview of key blockchain concepts

Minutes compiled by: **Jim Kofalt**

Approved on November 12, 2025

NEW HAMPSHIRE STABLE TOKEN STUDY COMMISSION

Date: October 15, 2025
Time: 10:05 AM – 12:10 PM
Location: 1 Granite Place, Room 229, Concord, NH
In-person with remote participation via Microsoft Teams

Minutes

ATTENDANCE

Commission Members Present

- Keith Ammon, Chair (Hillsborough 42)
- Jim Kofalt, Vice Chair (Speaker Pro Tem, Hillsborough 32)
- Tara Reardon (New Hampshire Senate, District 15)
- Seth Oranburg (Professor of Law, UNH Franklin Pierce School)
- Brandon Garod (Senior Assistant Attorney General, AG's designate)
- Katie Taylor (Staff Attorney, Bureau of Securities Regulation, Secretary of State's designate)
- Michael Moranti (Deputy Commissioner of Banking, Banking Commissioner's designate)
- Chris McAleer (Representative, Carroll County District 2, remote)
- Andy Schwab (Blockchain industry representative, remote)
- Dan Nuñez Cohen (Head of Policy, Crypto.com, remote)

Commission Members Absent

- Sen. Daryl Abbas
- Jim Kisch (Banking representative)

Members of the Public

- Sandra O'Neill (attorney, Sheehan Phinney)

I. OPENING & COMMISSION BUSINESS

Chair Ammon called to order the commission's first regular meeting. Four new commission members appointed by the governor's office were welcomed:

- Jim Kisch (banking representative) - absent due to Federal Reserve appointment in Boston
- Dan Nuñez Cohen (Crypto.com) - present
- Andy Schwab (blockchain industry) - present
- Seth Oranburg (UNH Law) - present

All vacancies are now filled.

The meeting was being livestreamed to YouTube, with Teams providing remote participant visibility.

Commission members provided brief introductions of their backgrounds and expertise.

II. MEETING OVERVIEW & MATERIALS

Chair Ammon reviewed the commission's legislative mandate focused on stable tokens and tokenized real-world assets. A blockchain basics one-pager from the Blockchain Association was distributed as foundational reference material. Detailed agendas and materials are available at nh-token-commission.org.

III. PRESENTATION: GLOBAL STABLECOIN & RWA LANDSCAPE

Presenter: Diana Bario Zales, Global Blockchain Business Council
Duration: Approximately 30 minutes including Q&A

Stablecoin Definitions & Regulatory Trends

The GBBC advocates for harmonized international definitions and requirements. Definitions remain in evolution, with regulatory convergence toward **fiat-backed and asset-backed models**. Algorithmic stablecoins face significant regulatory skepticism globally, though some remain in use in DeFi applications.

Official regulatory definitions (CFTC, Financial Stability Board, G20, EU, etc.) increasingly disfavor algorithmic stablecoins following market failures like Terra Luna.

Stablecoin Use Cases

Primary use cases identified:

- Payments and digital money on blockchain rails
- Remittances ($100B+ market with efficiency gains)
- DeFi lending, borrowing, trading, liquidity provision
- Bridge between traditional finance and crypto
- Retail and emerging market adoption (example: Argentine users holding stablecoins as inflation hedge)
- Institutional treasury functions
- Yield-generating strategies (DeFi experimentation)

Real-world examples:

- World Food Program humanitarian cash transfers (Afghanistan)
- Hong Kong partnerships and implementations
- Global expansion across multiple jurisdictions

Key Market Data

- **Total supply/market cap:** $200-250 billion, growing 50%+ year-over-year
- **Active users:** Wallet addresses grew from 19.6M to 30M (Feb 2024-Feb 2025)
- **Transfer volume:** 1.9T to 4.1T monthly (same period)
- **Market dominance:** US-pegged stablecoins dominant; USDT (Tether) and USDC (Circle) hold majority; USDC growing faster than USDT
- **Projections:** JP Morgan projects stable coin activity could drive $1.4 trillion in tokenized blockchain activity
- **Expectations:** USDC may surpass USDT by 2030

Stablecoin Risks & Challenges

- Regulatory uncertainty globally
- Peg stability risk if governance, reserves, or custodian trust erodes
- Counterparty and network risks
- Capital flight concerns in emerging markets
- Questions regarding private vs. public (CBDC) issued money coexistence

Global Regulatory Developments

United States:

- Genius Act (signed into law): Creates stable coin framework
- Clarity Act (proposed): Clarifies SEC/CFTC jurisdiction over digital assets
- OCC Interpretive Letter 1183: Allows national banks/federal savings associations crypto activities
- National Cryptocurrency Enforcement Team: Enforcement focused on criminal misuse rather than enforcement-first policy
- Strategic Bitcoin Reserve Executive Order: Indicates assets not inherently harmful

European Union:

- MiCA: Most comprehensive crypto framework, phased enforcement
- Digital Operational Resilience Act: Risk reporting improvements
- Overall: Known for heavy regulation; higher compliance burdens

United Kingdom:

- FCA proposed framework for stable coins (not yet finalized)
- Integration approach: Embed crypto within existing financial regulations

United Arab Emirates:

- Virtual Asset Rule Book: Tightened issuance rules
- ADGM updated framework: Streamlined definitions and processes
- National goal: Become top 5 global crypto hub via resource dedication

Singapore:

- Updated licensing frameworks and due diligence guidance
- Expanding regulatory reach; closing previous loopholes

Japan:

- Integration of crypto with securities regulation
- Focus on institutional adoption and investor protection

Brazil:

- Foundational framework with Central Bank jurisdiction
- Upcoming regulations on stablecoins, tokenization, taxation, accounting

Real-World Asset (RWA) Tokenization

Stablecoins represent one form of RWA tokenization. Broader opportunities include real estate, securities, commodities, intellectual property, and art.

Definition: Process converting real-world assets to digital value on distributed ledgers, enabling fractional ownership and liquid trading.

RWA Lifecycle:

1. Asset identification and legal structuring
2. Asset valuation
3. Off-chain custody/holding
4. Blockchain issuance
5. Distribution and trading
6. Redemption and compliance

RWA Market Data:

- Tokenized RWA market surpassed $10-15 billion on-chain value in 2025
- Major institutional players entering (BlackRock, Franklin Templeton, Ondo Finance, Maple Finance)
- US Treasury tokenization leading use case
- Projections: $1-3 trillion by 2030

Benefits:

- Fractional ownership and enhanced liquidity
- Reduced intermediation
- 24/7 trading capability
- Lower costs through disintermediation
- Faster settlement
- Transparency

Challenges:

- Regulatory uncertainty (secondary markets)
- Legal classification variability across jurisdictions
- Fragmented liquidity; isolated platforms
- Custody reliability and transparency concerns
- Asset-liability matching requirements
- Need for harmonized standards

Standards & Future Vision

Technical standards (ISO, IEEE) are critical alongside regulatory development. Web3 vision includes decentralized networks with blockchain, AI, metaverse, and tokenization as enablers for open, composable systems.

Q&A Discussion

Q (Ammon): Difference between fiat-backed and algorithmic stable tokens?

A (Zales): Fiat-backed tokens are backed by actual reserves (gold vaults, bank accounts) that are held and issued on blockchain as digital money representations. Algorithmic tokens have no real backing; value rests on supply-demand economics where the issuer manipulates supply to maintain pricing. Algorithmic tokens lack tangible backing and remain highly controversial (Terra Luna scandal). Far more clarity, understanding, and controls needed.

Q (O'Neill): How does real estate tokenization work with traditional legal structures like limited partnerships?

A (Zales): Legal agreements should be embedded on blockchain, but existing legal requirements don't disappear. Questions remain on how legal requirements, representations, governance, approvals, and smart contracts align. Legal agreements must be embedded in governance and consensus mechanisms. Still under negotiation. Diana noted she had to depart but committed to answering email questions from commission members.

IV. PRESENTATION: WYOMING STABLE TOKEN IMPLEMENTATION

Presenter: Anthony Apollo, Executive Director, Wyoming Stable Token Commission
Duration: Approximately 30 minutes including Q&A

Wyoming Statutory Framework

The Wyoming Stable Token Act passed in March 2023, creating the Wyoming Stable Token Commission as a state authority with mandate to issue stable tokens. The statute provides implementation flexibility.

Commission Structure:

- 7 commissioners
- Chair: Wyoming Governor Mark Gordon
- Members: State Treasurer, State Auditor, 4 subject matter advisors
- Key advisor: Flavia Navas (formerly General Counsel at Circle, largest domestic stablecoin issuer)

Agency Leadership:

- Executive Director: Anthony Apollo
- Chief Risk/Compliance Officer: Deborah Brooks (formerly Deputy Virtual Currency Chief, NY DFS)
- Chief Information Security Officer: Keith Lowhorn (illicit finance background)
- CFO: Joseph Salana (Wall Street veteran)
- Business Project Manager: Stephanie Chan

Governance & Transparency:

- Monthly public meetings open to public comment
- All materials posted on website
- Overseen by Wyoming Legislature's Select Committee on Blockchain, Financial Technology, and Digital Innovation
- Reports to Joint Appropriations Committee for budget

Frontier Stable Token Product

Characteristics:

- First fiat-backed, fully reserved stable token issued by a public entity in the US
- NOT a central bank digital currency (no central bank, not minting currency)
- Digital asset backed by cash and cash equivalents

- Reserves: Cash, short-duration US Treasuries, repurchase agreements
- Mechanism: Dollar in, dollar out
- Reserve requirement: 102% (must maintain over-collateralization before returning funds to state)
- Issued on multiple public, permissionless blockchains

Why Wyoming Pursued This

1. Digital Asset Integration Wyoming has passed ~50 digital asset bills over ~10 years, creating disparate initiatives (crypto tax payments, digital asset registry, DAO LLCs). Stable token enables value transfer across initiatives in digitally native manner.

2. Revenue Diversification Wyoming's economy dependent on oil/gas. Treasury-backed stable tokens generate interest income returning to state via quarterly distributions to school foundation fund. Potential significant state budget supplement if market grows (comparative: Tether with ~125 employees generates ~1B profit; Wyoming biennial budget11B; 10% of market could substantially fund state operations).

3. Fully Reserved Financial Instrument Second attempt following challenges to Special Purpose Depository Institution (SPDI) structure. Stable token provides alternative fully reserved financial vehicle.

Wyoming's Digital Asset Policy Foundation

- Property rights protections
- Digital Asset Registry (Secretary of State)
- Privacy: Prohibition on forced private key disclosure (1st Amendment protection)
- Entity structures: SPDIs, DAO LLCs
- CBDC prohibition (passed 2025)

Stable Token Benefits

General Benefits:

- Financial rails for global settlement
- Peer-to-peer elimination of intermediaries
- Operational 24/7/365
- Settlement: Sub-1 cent, seconds to completion

- Instantaneously auditable via immutable blockchain
- 300 billion market cap; rapid growth (45B added recently)

National Policy Benefits:

- Addresses US debt concerns ($37T+ and growing; Treasury needs buyers)
- Fiat-backed stablecoins now top-10 holders of US debt; Tether approaching top-5 by end-2025
- Preserves US dollar hegemony as world reserve currency; counters alternative currency concerns (BRICS+)
- Dollar-equivalent with crypto benefits increases dollar dominance globally

Public Entity Advantages vs. Private Issuers:

- Public good: Revenue goes to state school foundation
- Full transparency: Public meetings, procurement, rule-making processes
- Stability mandate: 102% reserve requirement mitigates de-pegging and liquidity crises
- Distribution: Sovereign entity status enables single issuance, global reach without multiple regulatory frameworks
- Constitutional protections: Permits any lawful use (unlike private issuers restricting firearms, medicine, tax payments)
- Privacy/security: Assessing "Goldilocks zone" for transaction privacy while maintaining compliance visibility (zero-knowledge proofs, homomorphic encryption in development)
- Interdiction controls: Freeze/seize capabilities only via valid court order

Implementation Timeline

- **March 2023:** Statute passed
- **September 2023:** Apollo hired as inaugural executive director
- **2024:** Initial scoping and development (~1 year)
  - New agency structuring
  - HR/tech integration
  - Request for Information (RFI)

  - Working groups (operations, finance, technical)

- **April-December 2024:** Team of 5 hired
- **Appropriations:** Initial budget under-spent (<50%); FY2025 budget 5.8M with <2M spent as of meeting

Blockchain Selection & Procurement

- **September-November 2024:** Evaluated ~30 objective criteria; selected ~9 candidate blockchains
- **Selection approach:** Identify candidates, not pick "winners"
- **Quarterly review:** Process repeated with new candidates added
- **Study:** Publicly available on website

Procurement Process:

- RFQ: November-December 2024
- RFP: January-February 2025
- Coverage: Blockchain issuance, key infrastructure, compliance, financial attestation
- Primary partner: Layer Zero (interoperable multi-chain deployment via distributed verifier nodes)

Rulemaking:

- Reserves Management Rule: Structure investment basket; detail minting, issuance, redemption, burning
- Token Management Rule: Issuance, burning, interdiction; emergency rulemaking with public comment through November 6

Current Status

Frontier Stable Token (FRNT):

- Announced August 2025
- Deployed on 7 interoperable blockchains
- Goal: Public availability by year-end on exchanges (Kraken) and via other issuers
- Distribution via RAIN (smart card with point-of-sale capability; Visa rail integration; 150M merchants)

Distribution Model:

- Not sold directly by Wyoming (small team; KYC/AML requirements)
- Licensed Service Providers (LSPs): Exchanges, payment platforms, community banks, credit unions
- LSP process: Perform user KYC/AML; send USD to Wyoming; receive stable tokens

Community Bank Involvement:

- Previously prohibited from public funds (until July 2025)
- Federal Reserve supervisory concerns addressed (supervisory memo rescinded)
- Expanded opportunity for community bank/credit union participation

Pilot Programs & Future:

- Engaging Wyoming-domiciled organizations with existing blockchain products
- Applications: Automated contracting, vendor payouts, payment apps, rural use cases

Future Initiatives:

- Yield distribution mechanisms
- Conversion to digital asset authority (enabling RWA—gold, silver, uranium, rare earths)
- Interstate compacts with other states
- Liquidity pools with other fiat issuers

Challenges

- Running a startup within state government (double constraints)
- Annual legislative cycle uncertainty
- Cascade of returns (interest income over-collateralizes, then cascades to state)
- Interest rate sensitivity (current 4% Treasury yields attractive; lower rates create fiscal pressure)

Q&A Discussion

Q: Can you work with national banks or only Wyoming banks?

A: Allowed to work with banks throughout the US and potentially beyond. LSP model enables national distribution. Recent example: Bank of North Dakota announcing "Rough

Rider" stablecoin (interbank only). Wyoming pursuing both institutional and retail use cases.

Q (Ammon): Explain "sufficiently decentralized blockchain" importance.

A (Apollo): Nakamoto coefficient measures blockchain decentralization (node operators, staking, pool numbers). Infrastructure matters: sequencers (e.g., Coinbase's Base had single sequencer). Layer Zero uses distributed verifier nodes (DVNs) requiring Wyoming DVN for all transactions; other DVNs may also verify (Google, Layer Zero, blockchain foundations). Interstate concept: States could have own DVNs requiring state agreement on transactions; extends decentralization to legal/jurisdictional layer. Interdiction/freeze-seize requires private key signing; if distributed across multiple states verifying court order legitimacy, strengthens both technical and legal decentralization.

Note: At least one Layer Zero founder came from UNH; Wyoming's Center for Blockchain discussed collaboration with UNH's Interoperability Lab.

Wyoming State Official Commentary

Colin Crossman, Director of the Business Division, Wyoming Secretary of State (remote): Wyoming Department of State has no direct stable token relationship but is supportive. All Bitcoin/crypto policy (DAOs, DUNAs, entity types) runs through Secretary of State's office. Offered assistance to other states on interstate cooperation and regulatory agreements.

V. PRESENTATION PREVIEW: FEDERAL LEGISLATION

Presenter: Seth Oranburg, Professor of Law, UNH Franklin Pierce School
Format: Brief preview (full presentation deferred to next meeting due to time)

Topics to be covered:

- Federal regulatory advancements
- Major legislation: Genius Act (recently passed), Clarity Act (proposed)
- Genius Act: Creates stable coin framework with 2-3 part system:
  - Federally qualified stable tokens
  - State qualified stable tokens
  - State-issued stable tokens (e.g., Wyoming)
- Clarity Act: Redefines digital asset typologies and regulatory jurisdiction (SEC vs. CFTC); clarifies securities regulation applicability

VI. PRESENTATION: REAL-WORLD ASSET TOKENIZATION

Presenters: Salman Banaei and Rich Minice, Plume Network
Duration: Approximately 30 minutes including Q&A
Note: Technical screen-sharing difficulties affected presentation visibility

Company Overview

Plume: American company (~60 employees, majority US-based; Asian-American founders; US/APEC focus)

Mission: Bridge DeFi and traditional finance; export US capital markets; develop on-chain capital markets

Market Position

- **Launch:** June 2025 mainnet (~4 months operational at meeting)
- **TVL:** $464 million across ecosystem
- **RWA metric:** 54% of non-stablecoin RWA wallet addresses across all blockchains
- **RWA holders:** 260,000+ wallet addresses
- **Geographic:** Currently geofenced inside US
- **Asset base:** US dollar-denominated (reflects global demand for US assets)

Institutional Backing:

- Apollo Global Management
- Digital Galaxy
- Wisdom Tree

Philosophy: "Robin Hood 2.0" not "Wall Street 2.0" focused on community/buy-side where demand drives supply

Strategic Pillars

1. Tokenization Services

- Issuer-owned smart contracts enabling yield distribution
- ARC: Tokenization engine (development) supporting compliance vendors, regulatory filing categories (Reg A, D, CF)
- NEST: Asset management protocol (production) creating digital vaults

NEST Protocol:

- Users deposit stablecoins; vaults issue vault tokens
- Vault curators manage preset/discretionary investment strategies
- TVL: $81 million
- Example: Superstate fund invests deposits in yield strategies; token price appreciates; redemption returns stablecoins + yield

2. Compliance

- Onchain whitelisting and transfer restrictions
- Modular permissioning
- Chainwide AML/sanctions screening (Elliptic, TRM databases)
- Protocol-level controls

3. Distribution

- Plume: EVM Layer 2 of Ethereum (easy wallet/exchange/DeFi integration)
- Regulated exchanges in ecosystem
- SEC transfer agent license (manage on/off-chain cap tables)
- Custodians: Fireblocks, Anchorage, Bitgo

4. Utility

- Staking, trading, secondary liquidity
- Borrowing against RWA assets
- Yield transmission across ecosystem

Why RWA Tokenization Matters

Market Opportunity:

- Estimates range billions to trillions
- "Next 100+ billion opportunity" for innovators
- Benefits: Faster settlement, global capital reach, cost savings via intermediary elimination, new revenue streams

Barriers Current Projects Face:

- No go-to-market for issuers; imbalanced demand/supply
- High compliance burden, setup costs, regulatory friction
- Fragmented infrastructure
- Plume addresses via offshore structures with SEC regulatory pathway development

Research Evidence

Bank for International Settlements Study:

- Lower bid-ask spreads in tokenized bonds
- Declining issuance costs

Hong Kong Monetary Authority (April 2023):

- Bond tokenization benefits study
- HK government response: Digital bond grant scheme (subsidizes 50% of issuance expenses for DLT-based bonds; covers issuers, platform providers, arrangers, legal advisors, listing fees)

Global Best Practices & Lessons for New Hampshire

Bermuda:

- Incorporated Segregated Account Companies (ISACs/SPVs) with legal personality
- Hold off-chain assets separately, remote from parent entity
- Digital asset businesses issue off-chain liabilities backed by ISACs
- Bankruptcy remoteness protection: If parent fails, ISACs unaffected
- Model: Flexible licensing and segregated structure attracts global RWA issuers

Hong Kong:

- Regulatory support + subsidies accelerating tokenization
- New licensing uplift for broker-dealers to tokenize RWAs

Switzerland:

- Tokenized shares as valid securities without physical certificates/written assignments

Singapore:

- Project Guardian (2022; expanded to dozens of institutions)

- Verified Credential Model: On-chain infrastructure connects wallets to KYC events; enables permissionless access after trust anchor KYC

EU (MiCA):

- Comprehensive crypto asset framework

Recommendations for New Hampshire:

1. Hong Kong model: Incentivize municipal bond tokenization
2. Bermuda structure: Develop US SPV framework
3. Singapore model: Update corporate law recognizing ledger-based equities as valid shares
4. Verified credentials: Alternative to traditional KYC
5. Federal recommendation: On-chain metadata in lieu of traditional KYC; leverage Singapore/ERC 3643 standards

Q&A Discussion

Q: Explain SPV (Special Purpose Vehicle) concept.

A: SPV takes off-chain assets (securities, commodities); issues tokenized liabilities backed by holdings. Bankruptcy-remote structure protects investors. FTX analogy: Prevents customer funds from parent company insolvency. Individual SPVs ensure claims against parent don't reach segregated assets. Bermuda and Plume use this structure.

VII. COMMISSION REFLECTIONS & DISCUSSION

Brandon Garod (AG designate): Found meeting valuable; significant learning curve. Appreciated educational background. Indicated desire to balance educational meetings with implementation focus.

Seth Oranburg (UNH Professor): Found company presentations valuable, especially insights on jurisdiction attractiveness. Example: Tokenized shares without paper certificates. Suggested mapping "pro-business wish list" to federal law constraints for policy maker guidance.

Decisions

- **Next meeting:** One more comprehensive educational meeting (3 speakers maximum); Seth to present on federal legislation

- **Secretary role:** No volunteers; Chair volunteered initially; will request volunteer next meeting
- **Materials:** Portal maintained for document posting; members encouraged to suggest resources

NEXT MEETING

Date: Wednesday, November 12, 2025
Time: 10:00 AM
Location: 1 Granite Place, Room 229, Concord, NH
Planned Presenter: Seth Oranburg (Federal Legislation & Genius Act)

ACTION ITEMS

Item	Responsible	Status
Send presentation slides	Diana Bario Zales (GBBC)	Completed
Send presentation slides	Anthony Apollo (Wyoming)	Completed
Send presentation slides	Salman Banaei (Plume)	Completed
Post slides to commission portal	Keith Ammon	Completed
Respond to email questions	Diana Bario Zales	Committed
Prepare meeting minutes	Keith Ammon	Completed
Plan federal legislation presentation	Seth Oranburg	For Nov 12

Meeting Adjourned: Approximately 12:10 PM

Respectfully submitted,
Keith Ammon, Chair

Approved on November, 12, 2025

NEW HAMPSHIRE STABLE TOKEN STUDY COMMISSION

Meeting Minutes

Date: November 12, 2025 | **Time:** 10:04 AM – 12:05 PM

Location: 1 Granite Place, Room 229, Concord, NH

ATTENDANCE

Commission Members Present

- Keith Ammon, Chair (Hillsborough 42)
- Seth Oranburg (Professor of Law, UNH Franklin Pierce School of Law)
- Brandon Garod (Senior Assistant Attorney General, AG's designate)
- Katie Taylor (Staff Attorney, Bureau of Securities Regulation, Secretary of State's designate) - remote
- Michael Moranti (Deputy Commissioner of Banking, Banking Commissioner's designate)
- Jim Kisch (Banking representative, Passumpsic Bank)
- Andy Schwab (Blockchain industry representative) - remote

Commission Members Absent

- Jim Kofalt, Vice Chair (Speaker Pro Tem, Hillsborough 32)
- Daryl Abbas (New Hampshire Senate, District 22)
- Tara Reardon (New Hampshire Senate, District 15)
- Chris McAleer (Representative, Carroll County District 2)
- Dan Nuñez Cohen (Head of Policy, Crypto.com)

Members of the Public

- Chuck Mooney (Uniform Law Commissioner) - remote

I. OPENING & COMMISSION BUSINESS

Chair Ammon called to order the commission meeting at 10:04 AM.

Jim Kisch Formal Introduction

Jim Kisch, banking representative from Passumpsic Bank serving the North Country region of New Hampshire and Vermont, formally introduced himself to the commission. Kisch noted his work with the National Bankers Association and the New Hampshire Bankers Association to guide community banks in understanding stable coins as a means to enable commerce and provide opportunities for participation in the emerging digital asset economy.

Chuck Mooney Online Identification

Chuck Mooney, Uniform Law Commissioner from New Hampshire, identified himself as involved in domestic and international projects on tokenization and related matters.

Remote Participant Identifications

Katie Taylor (Secretary of State's Office staff attorney) and Andy Schwab (blockchain industry representative) identified themselves remotely. Schwab noted his prior participation on a crypto commission several years ago and his five years of experience in the blockchain space as a technologist and business person.

Quorum Confirmation

Chair Ammon confirmed that seven commission members were present, establishing a quorum for voting purposes.

II. APPROVAL OF PREVIOUS MINUTES

September 17, 2025 Minutes

Chair Ammon presented the September 17, 2025 minutes, noting they had been available online for six to seven weeks at nh-token-commission.org. No comments or requested changes were offered. The minutes were unanimously approved by vote.

October 15, 2025 Minutes

Chair Ammon presented the October 15, 2025 minutes, which had been compiled using Commission meeting transcripts processed through AI with corrections applied to names and spelling. Chair Ammon noted that members could reference the YouTube video recording for verification of content. Professor Oranburg moved to approve; Michael Moranti seconded. The minutes were unanimously approved by vote.

III. PRESENTATION: FEDERAL LEGISLATION - GENIUS ACT AND CLARITY ACT

Presenter: Seth Oranburg, Professor of Law, UNH Franklin Pierce School of Law

Duration: Approximately 60 minutes including discussion

Overview

Professor Oranburg presented on significant federal legislative developments that are redefining the digital asset regulatory landscape. He noted that Congress has enacted two new federal statutes that are fundamentally reshaping how the United States regulates blockchain-based financial instruments. The presentation focused on how these federal developments frame the opportunities and constraints for state action, particularly for New Hampshire's commission work.

The GENIUS Act

The GENIUS Act is now law and specifically governs stable tokens, payment stable coins, and related instruments. Professor Oranburg characterized it fundamentally as monetary and banking law. Key elements of the framework include:

- Three-tiered regulatory framework encompassing federally qualified stable tokens, state-qualified stable tokens, and state-issued stable tokens
- Federal pre-emption considerations that balance federal banking authority with state regulatory authority
- Operational and governance requirements for issuer qualification
- Reserve adequacy standards and third-party attestation requirements
- Limitations on non-stablecoin activities by issuers to maintain focus and regulatory clarity

The Clarity Act

The Clarity Act, currently advancing through the Senate with significant momentum, will reshape digital asset markets more broadly beyond stablecoins alone. Key features include:

- Redefines digital asset typologies and clarifies jurisdictional boundaries between SEC and CFTC regulatory authority
- Distinguishes between payments, investments, and commodities with tailored regulatory approaches
- Creates new regulatory spaces for emerging digital asset classes while establishing frameworks for orderly development
- Addresses transactions and instruments beyond traditional payment stable coins

Implications for New Hampshire

Professor Oranburg emphasized that the legislation creates meaningful opportunities for state participation in regulatory frameworks while establishing guardrails through federal coordination mechanisms. States can pursue state-qualified stable token and state-issued stable token models while remaining compliant with federal requirements. The framework separates payments from investments, creating distinct regulatory pathways that states may leverage for different policy objectives.

Recent Federal Activity

Chair Ammon noted recent federal activity including the Senate's release of draft consensus comments on market structure legislation the day prior to the commission meeting, reflecting the rapidly evolving federal environment and demonstrating that Congress continues active work on digital asset policy.

IV. PRESENTATION: BLOCKCHAIN-BASED ASSET PROTECTION TRUSTS

Presenter: Ian Huyett, Attorney and Volunteer Board Member, New Hampshire Blockchain Council

Duration: Approximately 35-40 minutes including discussion

Introduction and Background

Ian Huyett presented on his law review article on blockchain and asset protection trusts, co-authored with attorney Brian Quirk. Huyett clarified that he was presenting in his capacity as a volunteer board member of the New Hampshire Blockchain Council, not as a lobbyist. He introduced this as a novel topic not yet covered by other states' commissions.

Smart Contracts and Blockchain Fundamentals

Huyett explained that blockchain innovation decentralizes ledgers across distributed nodes, rendering them immutable. The key innovation extends beyond data immutability to making entire self-executing programs (smart contracts) immutable. While the term "smart contract" is sometimes used to refer to legal contracts, Huyett clarified that smart contracts may constitute legal contracts in some scenarios or serve as part of legal contract execution. The real innovation for trust law is the ability to create immutable, self-executing trust structures.

Asset Protection Trusts (APTs) - Traditional Framework

Huyett discussed self-settled asset protection trusts, established financial instruments where settlors transfer assets to irrevocable trusts beyond their control. These structures originated from civil contempt doctrine and due process principles rather than statutory creation. He provided a detailed case study of a 2014 federal district court case where a defendant created a Cook Islands trust during litigation, transferring $1.7 million into an irrevocable structure requiring the trustee to:

- Maintain complete control over assets
- Pay only $10,000/month for the settler's support
- Refuse any request for additional distributions, even under duress
- Maintain this structure indefinitely

The court applied immutability principles from civil contempt doctrine to find that holding the defendant in contempt would be impossible, establishing the "defense of impossibility" that protects APT structures.

New Hampshire's Existing Trust Statutes

New Hampshire recognizes APTs under RSA 564B, which expressly permits creation of trusts exempt from both voluntary and involuntary transfers of the settler's interest. This statute provides two key protections:

1. Statutory recognition that settlors may create irrevocable, essentially immutable trusts
2. Express statutory protection shielding such trusts from creditor access

This statutory framework helps attract APT business to the state by demonstrating judicial and legislative familiarity with the concept.

Traditional APT Challenges

Despite legal protections, traditional APTs present significant litigation risks and expenses:

1. **Burden of Proof:** Settlers must prove impossibility, demonstrating at personal expense that they cannot comply with court orders to return assets
2. **Judicial Skepticism:** Courts unfamiliar with APTs sometimes express incredulity that a person would surrender millions of dollars with no retained control. Huyett cited a Ninth Circuit quote frequently used to invalidate APTs: "While it is possible that a rational person would send millions of dollars overseas and retain absolutely no control over the assets, we share the district court's skepticism."
3. **Accidental Back Doors:** Trust instruments may contain unintended mechanisms allowing asset recovery (e.g., trustee replacement provisions), which courts treat as evidence of retained control despite opposite intent
4. **De Facto Back Door Findings:** Courts may conclude, despite well-drafted trust documents showing immutability, that improper arrangements exist allowing the settler to recover assets—essentially unfalsifiable findings that create indefinite contempt risks
5. **Self-Created Impossibility Doctrine:** While increasingly disfavored and likely unconstitutional, courts may theoretically hold settlers in contempt if impossibility was created proximate to the court order (generally 60 days before or after)

Blockchain-Based Asset Protection Trusts (BB-APTs)

Huyett proposed that blockchain-based asset protection trusts would eliminate litigation risks inherent in traditional APTs by:

1. **Replacing trustee discretion with smart contracts** - Smart contracts and oracles make trustee decisions deterministic and programmable
2. **Simplifying the burden of proof** - Rather than parsing complex trust documents and inferring facts from human behavior, counsel merely needs to explain blockchain technology and smart contract functionality to demonstrate immutability
3. **Eliminating unfalsifiable de facto back doors** - No people exist to make discretionary decisions; the protocol determines all outcomes
4. **Creating verifiable immutability** - If a protocol states "hold 1.7 million, release10,000/month indefinitely," judges can verify this is mechanically impossible to breach

New Hampshire Policy Opportunities

Huyett recommended that New Hampshire, similar to its approach with traditional APTs, codify protections for blockchain-based APTs to attract this business:

Recommended statutory provisions include:

1. **Express jurisdiction language** - Provide personal jurisdiction where blockchain-based self-settled APTs are created or administered in New Hampshire, requiring some "physical hook" (people, resources, business registration) in the state to generate economic benefit as other jurisdictions (e.g., Cook Islands) do
2. **Smart contract recognition** - Expressly recognize that smart contracts meeting immutability standards receive the same protections as irrevocable spendthrift trusts under existing RSAs
3. **Impossibility defense codification** - Create statutory presumption that contempt defendants have a common law defense of impossibility when ordered to modify smart contract functionality
4. **Statutory definition of smart contracts** - Provide clear statutory definition of what constitutes a "well-constructed decentralized smart contract" so judges can rely on legislative guidance rather than case-by-case litigation
5. **Blockchain dispute docket** - Implement a specialized legal docket for blockchain-related disputes, signaling New Hampshire's legal system is specialized around blockchain litigation (building on prior commission recommendations)

Cook Islands Comparison

Huyett highlighted that the Cook Islands derives roughly one-third of its GDP from asset protection trust business. With only 10,000 residents and limited natural resources, the Cook Islands developed novel financial instruments offering protections other jurisdictions don't provide. New Hampshire, as a trust-focused state with significant wealth held in trusts, has similar opportunities to attract blockchain-based APT business through strategic policy innovation.

Q&A Discussion

Commission members asked clarifying questions about smart contract functionality and blockchain-based trust structures. Huyett provided detailed explanations of technical implementation and legal protections.

Presenter Information

Ian Huyett indicated availability for continued engagement with the commission. Commission members may access his law review articles through his personal website at IanHuyett.com or contact him by email.

V. PRESENTATION: DIGITAL CHAMBER - STATE REGULATORY APPROACHES AND DIGITAL FINANCE ROADMAP

Presenters:

- Anastasia Dellaccio, Executive Director, Digital State Network
  - Email: anastasia@digitalchamber.org
- Jonathan Schmalfeld, Director of Policy, The Digital Chamber
  - Email: jschmalfeld@digitalchamber.org

Duration: Approximately 30 minutes including Q&A

Organization Overview

The Digital Chamber representatives presented their organization as a leading industry association representing the digital asset industry and adjacent industries. With nearly 200 member organizations spanning traditional crypto platforms, exchanges, established banking institutions, and hybrid financial services organizations, the Digital Chamber focuses on advocacy, education, and policy development.

Mission and Strategic Focus

The Digital Chamber representatives outlined the organization's evolution and current strategic direction:

- **Federal Focus Origins:** For 11 years, the organization focused advocacy efforts at the federal level
- **State-Level Pivot:** With increasing federal clarity on digital asset regulation, the organization recognizes that "the rules of the road are now being written in the states"
- **Digital State Network Launch:** The organization announced pre-launch of a new Digital State Network initiative, officially launching Monday (November 17, 2025)
- **Mission:** Provide trusted education and resources to lawmakers, regulators, and policymakers; connect them with innovators, builders, and industry leaders

Member Diversity and Industry Composition

The Digital Chamber's nearly 200 member organizations represent diverse segments:

- Traditional crypto platforms and exchanges
- Established banking and financial institutions
- Community banks and credit unions
- Technology infrastructure providers
- Service providers and intermediaries across the ecosystem

Stablecoin Significance and Use Cases

The representatives emphasized why stablecoins matter to state policymakers:

- **Market Scale:** $170 billion in stablecoins currently in circulation; 98% are US dollar-linked
- **Dollar Dominance:** Stablecoin adoption ensures US dollar dominance not just in past/present but future
- **Use Case Expansion:** Stablecoins are expanding beyond crypto trading into payments, settlement, remittances, and DeFi applications
- **Enterprise Adoption:** Fortune 500 companies including Visa, Western Union, Stripe, and major banks are actively implementing or planning stablecoin strategies

- **Historical Parallel:** Noting pre-revolutionary war when states had their own currencies, the representatives drew parallels to emerging state-level digital finance approaches

State Regulatory Approaches - Case Studies

The Digital Chamber provided comparative analysis of regulatory frameworks from multiple states:

New York (BitLicense - 2015)

- **Approach:** Comprehensive licensing for all digital assets
- **Pros:** Sophisticated regulators, established precedent, consumer protection
- **Cons:** Per-blockchain approvals (USDC on Ethereum needs separate approval for Base, Solana, etc. - same issuer/backing/security, just different chain)
- **Result:** Limits stablecoin availability to NY residents; compliance barriers

California (Recently Modified)

- **Approach:** Streamlined BitLicense, learned from NY's mistakes
- **Key Fix:** Eliminated per-blockchain approval requirement
- **Now:** Issuer-based licensing (one approval, all blockchains)
- **Maintains:** Consumer protection & security standards
- **Result:** More efficient than NY without sacrificing protections

Texas (Guidance-Based)

- **Approach:** No separate stablecoin law; Department of Banking issues guidance
- **Method:** Classify stablecoins as "stored value" → integrate into existing TX law
- **Advantage:** Low compliance burden, business-friendly positioning
- **Proof:** Coinbase just announced (Nov 12, 2025) moving from Delaware to TX specifically due to crypto-friendly guidance
- **Result:** Attracts major businesses without creating barriers

Wyoming (Innovation-Forward, Multi-Track)

- **Track 1 - DAOs:** DUNA structure for decentralized organizations
- **Track 2 - Banking:** SPDI (fully collateralized, no lending) for crypto banks like Custodia
- **Track 3 - State Tokens:** Frontier Stable Token (pay vendors/citizens, collect taxes; not general consumer use)
  - Wyoming argues it's outside GENIUS Act scope (state-issued, not entity-issued)
- **Result:** Multiple pathways attract different types of blockchain businesses

Universal Best Practices (All States Should Have)

1. **Reserve Backing:** 1:1 ratio with bank deposits/US Treasuries
2. **Segregation:** Reserves legally separate from issuer (bankruptcy protection)

3. **Redemption:** Clear, enforceable, timely $1 redemption at issuer
4. **Consumer Protection:** AML/KYC at issuer level; minimal data collection for everyday users

Digital Finance Roadmap Concept

The Digital Chamber emphasized the strategic value of state digital finance roadmaps as tools for:

- **Transparent Communication:** Document each state's regulatory approach, competitive positioning, and digital asset policy direction
- **Interstate Learning:** Facilitate peer-to-peer learning among states
- **Industry Signaling:** Demonstrate state commitment to the digital economy
- **Competitive Positioning:** Help states identify unique advantages and differentiation strategies

Commission members expressed strong interest in developing a digital finance roadmap as a potential component of the commission's final report.

State Legislator Networking and Best Practices

The representatives described key support mechanisms:

- **Legislative Forums:** Networking forums bringing together state legislators to share best practices (NCSL, ALEC, National Democratic Leaders, and other organizations)
- **University Partnerships:** Collaboration with university innovation hubs and research centers
- **Best Practice Amplification:** Publishing and promoting state digital asset initiatives to showcase leadership and attract business
- **Member Connections:** Facilitating connections between state officials and industry builders/practitioners
- **Monthly Education:** Regular informational sessions and expert panels on policy topics

Agentic Commerce Discussion

In response to a commission inquiry about emerging best practices around agentic commerce—commerce facilitated between AI agents rather than individuals or traditional businesses—the representatives noted:

- Several member organizations are actively developing AI agent commerce capability
- ERC 404 initiative focuses on enabling secure agent commerce through standardized online payment protocols
- Member organizations are developing frameworks for authorization, consumer protection, and security in agent-mediated transactions
- Recognition that agentic commerce represents the next significant wave of internet-based commerce requiring proactive policy adaptation

Member Resources and Ongoing Support

Video: youtu.be/uwATC56h9Gs

The representatives:

- Reiterated the Digital Chamber's commitment to supporting New Hampshire's commission work
- Offered continued access to nearly 200 member organizations' expertise
- Committed to facilitating connections with specialized practitioners working on specific technologies or policy areas
- Provided contact information for future outreach

Q&A Discussion

Commission members inquired about potential areas for deeper engagement with the Digital Chamber, including specialized technical topics and opportunities to leverage the organization's member network for commission education and policy development.

VI. COMMISSION DISCUSSION & FUTURE DIRECTION

Scheduling Next Meeting

Chair Ammon proposed December 10, 2025 (Wednesday) for the next commission meeting at 10:00 AM. He noted that December 17 was unavailable due to a scheduled House session. One commission member indicated unavailability for international travel from December 4-21 but expressed willingness to participate remotely if the meeting occurred within that timeframe.

Strategic Direction and Interstate Collaboration

Commission members raised important strategic considerations regarding the commission's future work and positioning:

- **Interstate Collaboration Importance:** Recognition of the importance of interstate collaboration to avoid unnecessary regulatory duplication and support development of uniform or harmonized approaches across states
- **Facilitation Partners:** Identification of the Digital Chamber and Blockchain Association as potential facilitation partners for interstate connections and commerce coordination
- **Collaborative Advantages:** Recognition that collaborative approaches may provide comparative advantage benefits through resource optimization and coordinated market positioning
- **Competitive Dynamics:** Awareness that states with greater resources might pursue similar digital asset initiatives, necessitating strategic positioning for New Hampshire
- **Comparative Advantage Strategy:** Consensus that New Hampshire's strategy should focus on developing comparative advantages through specific regulatory innovations, technical expertise, or unique partnership positioning
- **Strategic Planning:** Agreement that future strategic planning should account for both internal strengths and external competitive dynamics

Digital Finance Roadmap

Commission members expressed strong interest in the digital finance roadmap concept presented by both industry representatives. There was consensus that such a roadmap could serve as a valuable component of the commission's final report, potentially helping to establish New Hampshire's positioning and leadership in the digital asset policy space.

VII. ADJOURNMENT

Chair Ammon requested a motion to adjourn. The motion was made and seconded unanimously. The meeting adjourned at 12:05 PM.

NEXT MEETING

Date: Wednesday, December 10, 2025

Time: 10:00 AM

Location: 1 Granite Place, Room 229, Concord, NH

Format: In-person with remote participation available

COMPILATION NOTES

These minutes were compiled from the official YouTube transcript of the November 12, 2025 meeting using Claude AI. The transcript was processed to correct names, spelling, and formatting while preserving the substantive content and discussion from the meeting. Commission members may reference the original YouTube video recording for verification of content and detailed discussion.

Submitted by Keith Ammon.

Approved on Dec. 10, 2025.

Draft statutory language, "Blockchain-Based Trusts Recognized" (Appendix H)

Presented to the Commission November 12, 2025. Reproduced from the Commission's working files (vault note "Blockchain Based Trusts").

359-V:5 Blockchain-Based Trusts Recognized.

I. Trusts administered through a smart contract shall be subject to the jurisdiction of the courts of this state when RSA 564-B:2-202 is satisfied or if the settlor directed any person or entity located in New Hampshire to create the relevant smart contract.

II. In any legal matter involving a trust, any alleged contemnor shall be presumed to have a common law defense of impossibility to the extent that the person is ordered to modify the functionality of a smart contract. This presumption may, in appropriate cases, be overcome by clear and convincing evidence that the smart contract is not decentralized.

III. A smart contract may act as the functional equivalent of an irrevocable spendthrift trust if its protocols would satisfy the criteria for such a trust under RSA 564-B:1-103 and RSA 563-B:5-502. Any such smart contract shall have the protections of an irrevocable spendthrift trust under RSA 564-B:5-502.

IV. No person shall be lawfully compelled to furnish a plaintiff or court with direct access to a wallet whose sole purpose is to receive and distribute funds from a smart contract governed by paragraph III of this section.

V. This section shall not restrain a court from ordering a beneficiary to produce funds received from a smart contract. This section shall not mean that a person may be compelled to provide access to any wallet not described herein.

NEW HAMPSHIRE STABLE TOKEN STUDY COMMISSION

Meeting Minutes

Date: November 12, 2025 | **Time:** 10:05 AM - 12:15 PM

Location: 1 Granite Place, Room 229, Concord, NH

ATTENDANCE

Commission Members Present

- Keith Ammon, Chair (Hillsborough 42)
- Jim Kofalt, Vice Chair (Speaker Pro Tem, Hillsborough 32)
- Brandon Garod (Senior Assistant Attorney General, AG's designate)
- Katie Taylor (Staff Attorney, Bureau of Securities Regulation, Secretary of State's designate)
- Michael Moranti (Deputy Commissioner of Banking, Banking Commissioner's designate)
- Jim Kisch (Banking representative, Passumpsic Bank)
- Chris McAleer (Representative, Carroll County District 2) - remote
- Dan Nuñez Cohen (Head of Policy, Crypto.com) - remote
- Andy Schwab (Blockchain industry representative) - remote

Commission Members Absent

- Daryl Abbas (New Hampshire Senate, District 22)
- Tara Reardon (New Hampshire Senate, District 15)
- Seth Oranburg (Professor of Law, UNH Franklin Pierce School of Law)

Members of the Public

- Emelia Galdieri, Banking Commissioner
- Ryan Hale, NH Bankers
- (Unidentified)

Presenters

- Noah Herman, Chief Strategy Officer, Fortris Global
- Greg Bell, Chief Business Officer, Hedera Foundation - remote
- John Kikko, Director of Business Development, Hedera - remote
- Shyam Nagarajan, Chief Operating Officer, Hedera - remote

I. OPENING & COMMISSION BUSINESS

Chair Ammon called to order the commission meeting at 10:05 AM. A quorum was confirmed with eight commission members present (five in-person, three remote). The meeting was livestreamed to YouTube.

The meeting agenda was approved without changes. The agenda included two presentations: Fortris Global and Hedera.

The November 12, 2025 meeting minutes were presented for approval. Chair Ammon noted the minutes were AI-generated from meeting transcripts with spelling corrections applied. Jim Kisch moved to approve; the motion was seconded and the minutes were unanimously approved.

Chair Ammon made a final call for volunteers for the clerk position. No volunteers came forward; the position remains unfilled. AI-generated transcripts will continue to serve as the basis for meeting minutes.

II. PRESENTATION: FORTRIS GLOBAL - ENTERPRISE STABLECOIN OPERATIONS

Presenter: Noah Herman, Chief Strategy Officer, Fortris Global

Duration: Approximately 50 minutes including Q&A

Presenter Background

Noah Herman has 20 years of experience in banking and fintech, including roles at Bank of New York Mellon (private banking), Sumitomo Mitsui (government-backed project finance), and ABN Amro (collateral desk covering steel, precious metals, coffee, and cacao). Herman served as the first go-to-market hire for Circle (now NYSE-traded), where he led institutional partnership efforts including the Visa partnership. He has been with Fortris for five years, currently serving as Chief Strategy Officer, splitting his time between corporate clients and government/state treasury engagements.

Company Overview

Fortris Global is a 200-person company providing enterprise crypto wallet infrastructure. Herman described the platform as "SAP or Oracle or FIS plus a bank on chain" - a full crypto platform that can mimic traditional financial treasury operations. The technology is entity-agnostic, serving governments, states, nonprofits, and corporations. Key clients include Save the Children (crypto donation management and treasury operations) and Trafigura (global commodities trading).

Stablecoin Market Fundamentals

Herman presented key market data on the current stablecoin landscape:

- Market capitalization: Approximately $300 billion, predominantly USD-pegged
- Market concentration: Circle (USDC) and Tether (USDT) represent 87% of market
- Treasury holdings: Stablecoins are now the 17th largest holder of US Treasuries (up from 20th last year), representing approximately $150 billion
- Dollar representation: 1% of all US dollars in circulation are now represented by stablecoins
- Transaction volume growth: 100x increase from 2020-2025, now second only to credit cards

Institutional Adoption Trends

Recent major acquisitions signal institutional commitment to stablecoin infrastructure: Stripe acquired Bridge (stablecoin infrastructure platform) approximately one year ago;

Visa is acquiring Zero Hash for approximately $2 billion. Major banks including JPMorgan, Citibank, and PayPal are actively developing stablecoin capabilities. Herman noted these are SEC filings representing real M&A activity that is expected to continue accelerating.

Enterprise Use Case: Trafigura

Herman presented Trafigura as an example of a systemically important corporate client. Trafigura is a Geneva-based oil, gas, and commodities trader with approximately $6 billion in annual revenue, operating approximately 500 VLCC max tankers globally, and maintaining relationships with 260+ banks. The company engaged Fortris to solve cross-border payment challenges - specifically the inability to move funds safely, quickly, compliantly, and 24/7/365. The company was paying massive demurrage fees at ports due to delayed fund transfers. Traditional banks could not operate on 24/7/365 rails; blockchain-based stablecoin infrastructure solved this operational challenge.

Operational Considerations for States

Herman outlined key operational considerations for states contemplating blockchain adoption:

Custody Options:

- Qualified custody: Third-party custodians (Coinbase, BitGo, Anchorage) with fiduciary obligations
- Managed custody: Hybrid approach with external infrastructure but organizational control
- Self-custody: Full organizational control using multi-signature security (IBM hardware, Google key management)

Security Features:

- Multi-approval signing: M of N authorization requirements (e.g., 6 of 7 signers)
- Immutable audit trails: All transactions recorded on blockchain
- Tiered signing authority: Matching organizational governance structures

ERP Integration:

- API integration with traditional financial systems (SAP, Oracle, QuickBooks, NetSuite)
- "Backward compatible technology" - meeting end users where they are
- Automatic data feed from on-chain transactions to treasury reporting systems

Federal Regulatory Landscape

Herman provided updates on federal legislation, noting he had met with Senators and Representatives in Washington D.C. the day prior:

GENIUS Act (Signed into Law): Creates stablecoin framework with cross-aisle support. Mandates collateralization requirements, transparency, and consumer protections. Herman credited Circle for establishing many of these principles before they were codified.

Clarity Act (Pending): Broader legislation addressing consumer protection, risk disclosures, and CFTC/SEC jurisdictional boundaries. Approximately 78 Democrats have joined Republicans in supporting the bill. Herman reported passage is expected, with timing being the remaining variable.

State Implementation Models

Herman summarized current state-level stablecoin initiatives, presenting them as a spectrum from full ownership to simple use:

Wyoming (Frontier Token): First state-issued stablecoin, deployed on Avalanche and Hedera blockchains. Commission formed approximately three years ago. Interest from Treasury-backed reserves returns to state (school foundation fund). Represents the "long path" requiring significant development effort.

North Dakota (Rough Rider Token): Announced approximately one month prior. State-owned Bank of North Dakota partnered with FIS (using Fiserv stablecoin infrastructure) to create a state stablecoin. Different approach from Wyoming - leveraging existing banking infrastructure and private sector partnership.

Ohio: Treasurer Sprague has passed legislation allowing digital asset payment acceptance for state services and taxes. Also exploring state bitcoin reserve management.

Pennsylvania: Focusing on crypto payment acceptance - enabling residents to pay taxes and state services with digital assets.

North Carolina: At early stages of exploration (Treasurer, CFO, CIO asking "what should we do?"). Testing cross-border transactions, including potential use case of paying university professors teaching abroad.

Q&A Discussion

Chair Ammon noted that stablecoin rails could facilitate international trade for New Hampshire. Herman agreed, emphasizing cross-border payments as the primary use case - the ability to send any amount instantly, at low cost, securely, anywhere in the world, with off-ramping to local currency.

Jim Kisch raised concerns about deposits potentially leaving the state if using third-party stablecoins like Circle. He noted the New Hampshire Bankers Association recently released a study showing New Hampshire banks reinvest deposits into local communities at the highest levels in the nation. Herman referenced StatePay, a state tokenization engine designed to ring-fence tax incentives within state boundaries, preserving local economic benefit and providing ROI back to state governments.

Brandon Garod asked about fraud prevention and asset recovery, noting that instant global transfers create significant opportunity for fraud and extortion. Herman explained that multi-approval technology provides internal controls similar to multiple click-throughs now required by services like Zelle. All transactions are auditable on-chain, providing accountability. While not perfect, this provides a level of control, governance,

accountability, and auditability that doesn't typically exist in traditional financial markets.

III. PRESENTATION: HEDERA - NETWORK AND ASSET CONTROLS

Presenters: Greg Bell (Chief Business Officer), John Kikko (Director of Business Development), Shyam Nagarajan (Chief Operating Officer)

Duration: Approximately 45 minutes including Q&A

Network Overview

Hedera is a public distributed ledger network founded in 2018-2019 in Texas by two US Air Force cryptography specialists. Greg Bell noted he was calling from Washington D.C. where he had spent several days in conversations with members of the Senate, Congress, the Commerce Department, and the OCC regarding market structure legislation. The network is governed by a council of Fortune 500 companies including Google, IBM, LG, Hitachi, Dell, Aero Electronics, Nomura, Standard Bank, Shinhan Bank, and EDF. Unlike fully permissionless networks, Hedera uses permissioned node validation, eliminating sanctions compliance risks from unverified validators (no probability of a node in North Korea validating transactions). The code base is operated and governed by the Linux Foundation in an open-source manner.

Technical Characteristics

- Transaction finality: Under 3 seconds with deterministic (not probabilistic) finality - legal certainty that a transaction has occurred
- Scalability: Designed for highly scalable microtransactions
- No front-running: Network structure prevents front-running for financial securities transactions
- Built-in KYC/AML: Network-level compliance attributes
- Fixed fees: Predictable costs denominated in USD, paid in HBAR (approximately 1/10 of a cent per transaction)
- No surge pricing: Unlike networks with Uber-style surge pricing (1000-2000x at congestion), Hedera maintains fixed fees
- Transaction volume: Over 71 billion transactions processed (exceeds combined transactions of Ethereum, Bitcoin, Avalanche, Polygon, and Ripple)
- Security: Asynchronous Byzantine Fault Tolerant (aBFT) - can achieve consensus even during network outages

Asset Controls and Consumer Protection

Kikko emphasized that Hedera was designed for regulatory compliance, offering elective controls for issuers:

- Freeze, burn, and reissue capabilities: Issuers can freeze assets, burn them, and reissue to rightful owners
- Transaction correction: Unlike permissionless networks where fat-fingered addresses result in permanent loss, Hedera enables administrative recovery
- OFAC compliance: No sanctioned wallet validators by default
- Embedded KYC/AML: Compliance capabilities built into token design
- Active fraud scanning: Wallet alerts for potential scams

- Decentralized recovery initiative: Co-sponsored initiative for key/password recovery

Interoperability and Ecosystem

- EVM compatible: Ethereum applications can port directly to Hedera
- Cross-chain bridges: Chainlink CCIP, Axelar router enable asset movement across networks
- Standards compliance: ERC-3643 compliant for standardized security tokens (Reg S, Reg D compatible)
- Custodian integration: Anchorage Digital, BitGo, Fireblocks
- Tokenization platforms: Securitize, Archax, Tokeny
- Exchange availability: Available on major centralized exchanges
- Programming languages: Eight languages supported (Solidity, Java, C, C++, Rust, Go, and others)
- Free testnet: Available for development and testing

Potential State Applications

The Hedera team outlined potential applications for state government:

- **State Stable Token:** Reserve assets (Treasuries) generate approximately 4% yield at current Fed rates; proceeds could fund public projects, social services, education, conservation
- **Digital ID/Driver's License:** On-chain verification reduces redundant KYC across entities using verifiable credentials
- **Title Tracking:** Real estate, vehicle titles on immutable ledger
- **Municipal Bonds:** Tokenized muni bonds with optional stablecoin interest payments; investors could elect digital format
- **Targeted Stimulus:** Direct-to-wallet disbursements to specific demographics with spending analytics capability
- **Supply Chain Tracking:** Emissions tracking, component provenance (currently used by Kia, Hyundai)
- **Environmental Compliance:** Virginia Department of Environmental Quality uses Hedera-based Water Electric Global for Chesapeake Bay watershed impact tracking
- **State Lottery:** Smart contract-based transparent lottery with stablecoin disbursements (Chair Ammon noted New Hampshire invented the state lottery)

Privacy Considerations

Nagarajan explained Hedera's approach to privacy through verifiable credentials - allowing selective, consented data sharing. Example: proving age 21+ for alcohol purchase without revealing name, address, or exact birthdate. This approach was used during COVID for vaccine verification in New York State. "Hash spheres" - private permissioned networks - can operate interoperably with the public network for sensitive applications, similar to an intranet to internet relationship.

Q&A Discussion

Keith Ammon emphasized the commission's goal of blockchain-agnostic recommendations and asked about interoperability. Bell explained that bridges (Chainlink, Axelar) enable assets like USDC to move across networks while reserves

remain with Circle. Wyoming's Frontier Token is deployed on both Avalanche and Hedera.

Chris McAleer raised security concerns. Nagarajan explained Hedera's security-by-design approach, noting no significant security incidents to date. If assets are stolen but remain on Hedera, they can be frozen and reissued to rightful owners based on the immutable ownership record.

Brandon Garod asked about fraud recovery timing for scam victims. Kikko explained there is no technical time limit - assets can be tracked, frozen, and reissued with proper verification. However, Bell and Nagarajan noted that once assets bridge to other networks (e.g., Ethereum), recovery becomes more difficult as no single entity has control. Asset recovery would be a policy decision for issuers regarding process and verification requirements.

Michael Moranti suggested WIC-style programs could use this technology for targeted, restricted-use distributions. Kikko confirmed this is possible though no state has implemented it yet.

Jim Kisch asked about the development environment for testing. Bell confirmed Hedera's testnet is free, gas fees are approximately 1/10 of a cent with no surge pricing, and the platform supports eight programming languages.

IV. COMMISSION DISCUSSION & FUTURE DIRECTION

Treasury and Revenue Engagement

Michael Moranti suggested involving the State Treasurer and Department of Revenue Administration, especially given BFA bond implications. Keith Ammon acknowledged this as an oversight in the commission's original composition and committed to making those connections. Moranti noted that New Hampshire Lottery may already accept crypto payments (converted immediately to dollars).

DAO Registry

Keith Ammon noted the Secretary of State's office is establishing a DAO (Decentralized Autonomous Organization) registry that will accept stablecoin payments (USDC or Tether) for registration fees - New Hampshire's first foray into accepting digital assets at the state level.

Alternative Viewpoints

Keith Ammon solicited alternative perspectives on digital assets. Emelia Galdieri (Banking Department staff) mentioned attempts to contact a neutral industry commentator (Fintech Brain Food author). Keith Ammon invited anyone with negative or skeptical viewpoints to present to the commission.

Commission Resources

Keith Ammon directed members to the commission portal (nh-token-commission.org) resources section, highlighting the Hedera one-pager, blockchain basics document, recent news articles, and the glossary which is updated as new terms are introduced.

V. PUBLIC COMMENT

No public comments were offered during the designated period. A member of the public requested commission member introductions for the record.

VI. ADJOURNMENT

A motion to adjourn was made and seconded. Approved unanimously.

Meeting Adjourned: Approximately 12:15 PM

NEXT MEETING

Date: Wednesday, January 14, 2026

Time: 10:00 AM

Location: TBD (room may differ; members advised to watch for updates)

Format: In-person with remote participation for presenters available

Planned Presenters: BitGo and Anchorage Digital (major custodians; BitGo is working with BFA on bonds)

COMPILATION NOTES

These minutes were compiled from the official YouTube transcript of the December 10, 2025 meeting using Claude AI. The transcript was processed to correct names, spelling, and formatting while preserving the substantive content and discussion from the meeting. Readers may reference the original YouTube video recording for verification of content and detailed discussion.

Submitted by Keith Ammon.

Approved on January 14, 2026.

NEW HAMPSHIRE STABLE TOKEN STUDY COMMISSION

Meeting Minutes

Date: January 14, 2026 | **Time:** 10:05 AM - Approximately 12:05 PM

Location: 1 Granite Place, Concord, NH (In-person with remote participation via Microsoft Teams)

ATTENDANCE

Commission Members Present

- Keith Ammon, Chair (Hillsborough 42)
- Daryl Abbas (New Hampshire Senate, District 22)
- Michael Moranti (Deputy Commissioner of Banking, Banking Commissioner's designate)
- Jim Kisch (Banking representative, Passumpsic Bank)
- Katie Taylor (Staff Attorney, Bureau of Securities Regulation, Secretary of State's designate) - remote
- Andy Schwab (Blockchain industry representative) - remote
- Brandon Garod (Senior Assistant Attorney General, AG's designate)
- Seth Oranburg (Professor of Law, UNH Franklin Pierce School of Law)
- Dan Nunez Cohen (Head of Policy, Crypto.com) - remote

Commission Members Absent

- Chris McAleer (Representative, Carroll County District 2)
- Jim Kofalt, Vice Chair (Speaker Pro Tem, Hillsborough 32)
- Tara Reardon (New Hampshire Senate, District 15)

Members of the Public

- Emelia Galdieri, Banking Commissioner
- Karen Parker Feld, Kensington resident
- Woody Canaday

Presenters

- Melinda Delis, Institutional Partnerships and Strategy, Anchorage Digital
- Joe Medioli, Head of Financial Institutions Group, Anchorage Digital - remote
- Kevin Wysocki, Head of Policy, Anchorage Digital - remote
- Charles Uchill, Co-founder and CIO, Ceres Coin - remote

I. OPENING & COMMISSION BUSINESS

Chair Ammon called to order the commission meeting at 10:05 AM. A quorum was confirmed with seven commission members present. The meeting was livestreamed to YouTube.

Chair Ammon noted one change to the agenda: BitGo, originally scheduled to present, had their initial public offering the previous day and is now in their quiet period. Their presentation was postponed to March. In their place, Ceres Coin, an SEC-registered stablecoin project, was added to present.

The meeting agenda was approved without objection.

The December 12, 2025 meeting minutes were presented for approval. Chair Ammon noted the minutes were AI-generated from meeting transcripts with spelling corrections applied. Jim Kisch moved to approve; Michael Moranti seconded. The minutes were unanimously approved.

II. PRESENTATION: ANCHORAGE DIGITAL

Presenters: Melinda Delis (in-person), Joe Medioli (remote), Kevin Wysocki (remote)

Duration: Approximately 60 minutes including Q&A

Company Overview

Anchorage Digital is a global digital assets platform founded in 2017, originally as a state trust bank in South Dakota. In 2021, Anchorage became the first crypto-native institution in the United States to receive a federal banking charter as a national trust bank. The company was founded by security engineers with a "security first" approach, providing custodial services, trading services, settlement services, and crypto-native services like staking to institutional clients across multiple jurisdictions.

Genius Act Momentum

Melinda Delis highlighted significant activity following the Genius Act's passage, which provided regulatory clarity for stablecoin issuance. Key partnerships announced include:

- Ethena: Partnership to bring their stablecoin under US regulatory remit
- Tether: Partnership to launch USAT, a US-compliant version of USDT, the world's largest stablecoin
- Western Union: Partnership to launch USDPT stablecoin on Solana, modernizing their 175-year-old remittance business

Government Applications

Delis discussed the Marshall Islands' recent announcement to use a tokenized sovereign bond (USDM1) for direct payments to citizens, demonstrating how governments can use stablecoins and tokenized assets to drive efficiency, eliminate logistical hurdles in cash distribution, and serve remote communities. The model offers both payment functionality and investment vehicle characteristics.

Banking Transformation

Joe Medioli outlined how banking is adapting to digital asset technology across several key areas:

- Remittances: Stablecoins reduce multi-day settlement timelines and expensive wire fees, with speed reducing foreign exchange and counterparty risk
- Instant Payments: Stablecoins enable interbank settlement with shared ledger validation, operating 24/7

- Collateralized Lending: Digital assets like Bitcoin can serve as collateral for credit extension, broadening credit access without requiring asset sales that trigger tax consequences
- Wealth Management: Enabling financial advisors to provide clients exposure to digital assets within regulated frameworks

State Opportunities

Medioli emphasized that major innovation often starts at the state level, citing Wyoming's development of a comprehensive examination manual for special purpose depositories. He noted that states can develop frameworks for financial institutions that support capital efficiency, payments innovation, and what he termed "white whale opportunities" - long-term transformative applications like putting property records on blockchain to eliminate expensive lien searches.

Responsible Innovation

The presenters emphasized that while the underlying technology changes, compliance obligations remain: consumer protection, fraud prevention, money laundering controls, and sanctions compliance. The key is embedding security into technology design and leveraging blockchain's pseudonymous (not anonymous) nature for transaction tracing and auditability.

Q&A Highlights

Jim Kisch asked about trends in stablecoin usage for remittances. Joe Medioli and Kevin Wysocki explained that recipients often hold stablecoins rather than converting to local currency, effectively expanding US dollar usage globally. This aligns with Congress's intent in passing the Genius Act to export US dollars worldwide.

Chair Ammon asked about fungibility between USAT (the US version) and USDT (international). Kevin Wysocki explained that USAT will have stricter reserve requirements (one-to-one backing with cash equivalents like short-term treasuries) to comply with the Genius Act, while the coins are tradable but not directly swappable.

Michael Moranti asked which states are doing revenue collection with digital assets. Delis noted Louisiana and Pennsylvania have passed related legislation but committed to provide specifics in follow-up.

III. PRESENTATION: CERES COIN - SEC-REGISTERED YIELD-BEARING STABLECOIN

Presenter: Charles Uchill, Co-founder and CIO (remote)

Duration: Approximately 30 minutes including Q&A

Background

Uchill, a West Point graduate and former US Army Ranger, has engaged with approximately 20 state treasurers and departments since April 2025, including Mississippi, Delaware, Connecticut, Maryland, Kansas, Missouri, Alabama, Wyoming, and North Dakota. He noted that each state has unique pain points and needs.

Security-Backed Yield-Bearing Stablecoin Model

Unlike payment stablecoins (governed by the Genius Act), Ceres Coin is a securities-based stablecoin regulated by the SEC. The key distinction: Ceres Coin represents a share of a US government money market fund, with yield passing to the coin holder rather than the issuer. This is explicitly excluded from the Genius Act's definition of payment stablecoins as a "40 Act security regulated by the SEC."

The coin is backed by Rule 2A7-compliant US government securities (cash, short-duration US Treasuries, repurchase agreements), maintaining a $1 NAV while enabling instantaneous peer-to-peer transfers and real-time auditability.

SEC Registration Process

Uchill described the challenging registration process: initially filed under Regulation A exemption (normally 60 days), the process took two years, three months, and eleven days, including nine months addressing GAAP accounting treatment. The SEC challenged whether the stablecoin was indeed a security. Ceres is now registered as a US government money market fund with Ceres serving as the transfer agent, maintaining the ledger on blockchain.

Technical Infrastructure

The platform is currently built on Hyperledger Fabric (private chain) and is migrating to Solana (public permissionless chain) in Q1 2026. Ceres must report to the SEC as they transition. The fund is audited by Tate Weller with Huntington National Bank as custodian.

Government Use Cases

The platform was originally built for cannabis industry tracking (seed-to-sale tracking and reporting), then expanded to government applications. Proposed use cases include:

- 529 education savings programs: Real-time audit of transactions to whitelist approved purchases, eliminating the 2,000 hours of manual audit experienced by Kansas
- SNAP benefits: States could earn yield on federal dollars while tracking transactions to approved vendors
- ABLE programs: Benefits distribution with built-in compliance tracking
- Sunbucks (summer meal assistance): Administering the program while states earn yield, addressing concerns that led 13 states to opt out

State Partnerships

Ceres signed a letter of intent with Mississippi's state treasurer to explore integration into state-managed financial benefits programs. They assisted in crafting a legal opinion (expected soon) authorizing the state treasurer to hold and invest in stablecoins. Discussions with Wyoming's Stable Token Commission explored integrating Ceres with Wyoming's Frontier Token.

Q&A Highlights

Jim Kisch asked about liquidity risk management. Uchill explained that Rule 2A7 compliance ensures the fund holds the most liquid securities available, with sufficient liquidity to redeem all coins instantaneously if needed.

Video: youtu.be/28sJorXV3cs

Chair Ammon asked about the potential for states to tokenize federal funds flowing through the state, capturing yield while maintaining distribution. Uchill confirmed this is exactly the model, noting that half of state budgets come from federal funds that could potentially earn yield while awaiting distribution.

Emelia Galdieri noted parallels with the Public Deposit Investment Pool (PDIP), describing Ceres as essentially "the stablecoin version of the PDIP."

IV. COMMISSION REFLECTIONS & DISCUSSION

Chair Ammon noted ongoing difficulty finding skeptical viewpoints to provide balance. He mentioned the need to address environmental factors (introduced in the enabling legislation), noting that proof-of-stake networks used for stablecoins and real-world asset tokenization use minimal energy compared to proof-of-work systems like Bitcoin. Michael Moranti suggested inviting UNH's Interoperability Lab to present comparative energy data.

Discussion touched on the state's capacity to build infrastructure required to become a stablecoin issuer, with the Ceres model offering a bundled solution requiring less state investment.

Jim Kisch expressed concern about potential deposit flight from community banks if funds move to federal securities-backed instruments, though acknowledged the programmability of smart contracts creates flexibility in how money is disbursed and controlled.

Michael Moranti noted data showing approximately $1 billion in crypto left New Hampshire in a single quarter, expressing concern that easier stablecoin usage could accelerate this trend.

Chair Ammon asked whether New Hampshire community banks could collectively pool together to offer stablecoin services as a block, rather than individually.

Karen Parker Feld (public) offered to contribute risk analysis perspectives based on her background in institutional investing, foreign exchange, and derivatives, suggesting the commission tease out risk scenarios and consider public education components.

Woody Canaday (public) asked about mechanisms for community banks to use stablecoins for lending while keeping funds local. Melinda Delis discussed potential structures including accepting stablecoins converted to tokenized deposits, noting current regulations do not permit banks to accept stablecoins as deposits directly.

V. FUTURE TOPICS

Chair Ammon identified algorithmic stablecoins as an area not yet covered that warrants future examination.

VI. ADJOURNMENT

Chair Ammon noted the commission would be moving from this location to the Banking Department for future meetings due to room availability constraints for statutory study commissions.

Meeting Adjourned: Approximately 12:05 PM

NEXT MEETING

Date: February 10, 2026

Location: Banking Department conference room

Planned Presenters: BitGo (postponed from this meeting; scheduled for March after quiet period)

COMPILATION NOTES

These minutes were compiled from the official transcript of the January 14, 2026 meeting using Claude AI. The transcript was processed to correct names, spelling, and formatting while preserving the substantive content and discussion from the meeting. Readers may reference the original YouTube video recording for verification of content and detailed discussion.

Submitted by Keith Ammon.
Approved on February 10, 2026.

NEW HAMPSHIRE STABLE TOKEN STUDY COMMISSION

Meeting Minutes

Date: February 10, 2026 | **Time:** 3:05 PM – Approximately 5:10 PM

Location: Banking Department, Concord, NH (In-person with remote participation via Microsoft Teams)

ATTENDANCE

Commission Members Present

- Keith Ammon, Chair (Hillsborough 42)
- Seth Oranburg (Professor of Law, UNH Franklin Pierce School)
- Brandon Garod (Senior Assistant Attorney General, AG's designee)
- Michael Moranti (Deputy Commissioner of Banking, Banking Commissioner's designee)
- Jim Kish (Banking representative, remote)
- Katie Taylor (Staff Attorney, Bureau of Securities Regulation, Secretary of State's designee, remote)
- Dan Nunez Cohen (Head of Policy, Crypto.com, remote)

Commission Members Absent

- Jim Kofalt, Vice Chair (Speaker Pro Tem, Hillsborough 32)
- Sen. Tara Reardon
- Sen. Daryl Abbas
- Chris McAleer (Representative, Carroll County District 2)
- Andy Schwab (Blockchain industry representative)

Other Officials and Members of the Public

- Emelia Galdieri (Bank Commissioner)
- James Karas (Director, Abandoned Property Division, State Treasury)
- Ryan Hale (NH Bankers Association)
- Karen Parker Feld (Kensington, NH, member of the public)

Presenters

- Julie Lascar, Director of Policy and Government Affairs, Digital Asset Holdings (Canton Network)
- Matt Whitlock, Founder, Porcupine Properties LLC (Tokenized Real Estate)

I. OPENING & COMMISSION BUSINESS

Chair Ammon called the meeting to order and conducted a roll call of commission members and public attendees. James Karas noted he was attending on behalf of State Treasurer Mezzapelle, who was unable to attend. He indicated the Treasury has been meeting with several firms and is following the commission's work, particularly through the lens of abandoned property.

Chair Ammon invited public comment before presentations. No public comments were offered.

Approval of January 14, 2026 Minutes

Chair Ammon presented the January 14, 2026 meeting minutes, noting they are available on the commission website (nh-token-commission.org). Chair Ammon made a motion to approve. The motion was seconded. The minutes were approved unanimously with no opposition.

Meeting Overview

Chair Ammon outlined two presentations for the meeting: (1) the Canton Network, a blockchain platform the banking industry is converging on, and (2) a tokenized real estate startup, relevant to the commission's charge on tokenized real-world assets.

II. PRESENTATION: CANTON NETWORK

Presenter: Julie Lascar, Director of Policy and Government Affairs, Digital Asset Holdings

Duration: Approximately 50 minutes including Q&A

Company Overview

Digital Asset Holdings has been in operation for approximately 10 years and is the creator of the Canton Network. Lascar previously spent 10 years at the U.S. Treasury Department working on anti-money laundering and sanctions policy.

Tokenization Philosophy

Digital Asset views tokenization as creating on-chain tokens that represent the same rights, legal obligations, and ownership as the underlying physical or digital assets. The company frames tokenization as a new model for books and records in capital markets, moving from paper to electronic to blockchain-based record keeping. The primary benefit is dramatically reduced settlement times: domestic payments currently take two to three days, cross-border payments can take weeks, and dividends can take a month to settle. Blockchain settlement can be nearly instantaneous, benefiting both retail consumers and corporations through faster access to funds and interest accrual.

Barriers to Institutional Blockchain Adoption

Lascar identified three key barriers that Canton was designed to address:

- **Privacy:** Traditional financial institutions are reluctant to place books and records on public blockchains where transactions, investments, trades, and salary payments would be publicly visible.
- **Throughput and Scalability:** Capital markets involve trillions and quadrillions of dollars in activity. Lascar cited the 2017 CryptoKitties incident, where a single application consumed 12% of Ethereum network transactions, causing delays and increased fees across the network.
- **Regulatory Control:** Financial institutions need the ability to undo fraudulent transactions, freeze assets for sanctions compliance, and pause transactions for anti-money laundering review.

Canton Network Architecture

The Canton Network is a privacy-enabled public blockchain built for regulated financial institutions and crypto applications. It is public and permissionless at the base layer, but individual applications (such as financial institutions) can define their own access and disclosure policies. Each institution maintains its own sub-compartment of the blockchain with customizable privacy and governance controls, while the Canton Network enables seamless transactions between these subnets.

The network uses a global synchronizer to validate and coordinate transactions across the network. Approximately 39 super-validators (including Broadridge, DRW, Circle, and TRM Labs) oversee global synchronization. Super-validators must submit proposals and receive two-thirds approval from existing super-validators to join, ensuring that validators meet legal and regulatory eligibility requirements including sanctions compliance.

Privacy Model

Canton's privacy model allows each financial institution to see its own information and choose what to share with others. Data is shared on a need-to-know basis. Law enforcement access follows existing procedures through the financial institution, not through the blockchain directly. This enables institutions to comply with SEC, CFTC, anti-money laundering, and sanctions obligations.

Network Activity and Partnerships

Key developments on the Canton Network include:

- **DTCC Partnership:** The Depository Trust & Clearing Corporation (DTCC) announced it will partner with the Canton Network and Digital Asset to bring DTC-custody U.S. Treasuries onto the blockchain. The SEC issued a no-action letter in December allowing DTCC to tokenize U.S. Treasuries, ETFs, and certain equities. DTCC chose Canton as the first blockchain for this initiative.
- **Broadridge:** Processing approximately $6 trillion worth of repo transactions on the Canton Network.
- **Circle:** Providing 24/7 stablecoin (USDC) liquidity on the network.
- **JPMorgan Chase:** Announced plans to bring JPM Coin onto the Canton Network.

Canton Coin

Canton Coin is the network's utility token used to pay transaction fees. The coin launched via a fair launch with no pre-mining and no venture capital allocation. Coins are earned through work and distributed among applications, infrastructure providers (validators and super-validators), and users, incentivizing real activity on the network.

Tokenized Securities Policy

Lascar emphasized the importance of definitional precision in tokenization. Digital Asset distinguishes between tokenized securities (which provide the same legal and economic rights as the underlying asset) and tokenized synthetic securities (reference tokens that do not). This distinction is reflected in recent SEC guidance. Lascar urged the

commission to ensure that any framework includes clear definitions so consumers and investors understand what they are holding, and so that assets remain fungible across platforms.

Q&A Discussion

Q (Oranburg): Does the Canton business model depend on the Clarity Act permitting rewards? **A (Lascar):** Digital Asset has not weighed in on the rewards question, as their core business is bringing real-world assets on chain. However, they support the Clarity Act because traditional financial institutions are waiting for statutory clarity, and Section 505(d) of the Act prohibits misrepresenting tokenized securities.

Q (Ammon): Will DTCC tokenize individual securities to enable tracing of ownership? **A (Lascar):** DTCC will initially start with tokenizing U.S. Treasuries and then expand to other assets. Lascar committed to providing more detail on the specific implementation structure.

Q (Jim Kish): How is the Canton Network approaching tokenized deposits? **A (Lascar):** Currently much of the underlying cash for transactions on the network is in stablecoins, but Digital Asset envisions tokenized deposits also providing the cash leg. The company is agnostic on the form and is working with multiple financial institutions to help them move assets on chain. JPMorgan Chase is putting JPM Coin on Canton, and any financial institution could create similar tokenized deposits.

Q (Katie Taylor): Faster settlement times can be concerning from a regulatory perspective. What safeguards exist? **A (Lascar):** Each institution can create its own permissions, including the ability to reverse or pause transactions. The SEC no-action letter to DTCC specifically requires that customers understand their assets will be tokenized.

Q (Oranburg): Could municipal governments use this technology for property records? **A (Lascar):** Anything that can be tokenized can be put on the Canton blockchain. The privacy features allow permissioned or public access depending on the use case. Lascar committed to checking whether any real estate or government projects currently exist on the network.

Q (Ammon): Is Canton interoperable with other blockchains? **A (Lascar):** Yes, bridges exist for cross-chain movement. For example, Circle created a controlled bridge to move USDC onto Canton. The same cross-chain challenges (wrappers, bridges) apply as elsewhere, but Canton is not a walled garden.

Q (Ammon): Could New Hampshire community banks each operate their own application on the network and trade tokenized deposits with each other to create a larger liquidity pool? **A (Lascar):** Yes, any financial institution can join, develop its own governance, and transact with other institutions on the network. From a technological perspective, this is fully feasible.

Q (Ammon): Could a state be a validator or super-validator? **A (Lascar):** A state can be a validator. To become a super-validator, the state would need to submit a proposal and receive two-thirds approval from existing super-validators, following the same process as any other entity.

Video: youtu.be/32gO4c8Y91s

Q (Ammon): How do regulators access information on the network? **A (Lascar):** Regulators work with the regulated financial institution directly, not with the Canton Network. Institutions can permission regulator access to their information as part of their own governance structure.

III. COMMISSION DISCUSSION: CANTON NETWORK

Following the Canton Network presentation, commission members discussed the implications for New Hampshire.

Jim Kish noted the Canton Network's combination of private and public ledgers provides compliance rails alongside public functionality, and suggested it could provide significant future opportunities if the commission considers selecting a chain.

Chair Ammon observed that if a single chain could run various state projects (including a state stable token, driver's licenses, property records), it would provide efficiency through one system and one set of training rather than requiring multiple platforms.

A commission discussion on zero-knowledge proofs followed, with Chair Ammon providing a simplified explanation of how ZK proofs enable verification of information (such as age) without revealing the underlying data. He referenced the glossary available on the commission website and noted that Canton's privacy approach may differ from ZK-based systems, warranting further investigation.

Jim Kish noted that from a banking perspective, zero-knowledge proofs present challenges for know-your-customer and sanctions checking requirements, which need more than a simple yes/no verification.

Chair Ammon raised the tension between AML/KYC requirements and data privacy, noting that current systems create honeypots of personal information vulnerable to data breaches, and that zero-knowledge proofs could potentially address this problem.

IV. PRESENTATION: TOKENIZED REAL ESTATE (PORCUPINE PROPERTIES)

Presenter: Matt Whitlock, Founder, Porcupine Properties LLC

Duration: Approximately 60 minutes including Q&A

Presenter Background

Whitlock is a New Hampshire resident of 16 years and a software engineer specializing in distributed systems, cybersecurity, and cryptography. He was a co-inventor of the Lamassu Bitcoin ATM in 2013 and developed the back-end trade engine and cold storage vault software for CoinFloor, a London-based Bitcoin exchange. Chair Ammon recognized Whitlock as a co-inventor of one of the first Bitcoin ATMs intended for mass production.

Company Overview

Porcupine Properties LLC is a New Hampshire-based real estate holding company whose mission is to democratize access to real estate investing, empower everyday individuals to compete with corporate landlords, and retain rental incomes within local

communities. The LLC structure is traditional, but the equity in the LLC is tokenized using blockchain technology. Whitlock clarified that the property itself is not tokenized; rather, the ownership interests in the holding company are represented by tokens, which fits within existing legal frameworks.

Pine Tokens

Pine tokens represent ownership records in the company, replacing traditional paper stock certificates. Token transfers on the blockchain trigger legal transfers of ownership interest in the LLC. All existing tenant-landlord and securities laws still apply. Token holders can view capital accounts, shares, token records, lots for tax purposes, and dividends through the company website. Dividends are distributed on the blockchain, and token holders can choose to receive them in Bitcoin, USDC, or reinvested pine tokens. The website also provides a voting interface for company governance decisions.

Technology Platform: Liquid Network

Pine tokens are issued on the Liquid Network, a Bitcoin sidechain (layer 2) created by Blockstream. The Liquid Network operates as a federated two-way peg, where bitcoins on layer 1 can be pegged in to the sidechain for faster and cheaper transactions, then moved back. The network supports native asset issuance and uses confidential transactions by default (developed by Gregory Maxwell and Adam Back). Confidential transactions combine zero-knowledge proofs and homomorphic cryptography to allow transaction verification without revealing amounts or asset types to third parties.

Whitlock provided a simplified explanation of homomorphic cryptography: it allows mathematical verification (e.g., inputs equal outputs) using scrambled numbers that reveal no actual values. Blinding keys held by senders and receivers can be selectively shared to reveal actual amounts when needed.

AML Compliance by Technology

Blockstream's Asset Management Platform (AMP), built on the Liquid Network, introduces issuer-tracked and transfer-restricted asset subclasses. Issuer-tracked tokens allow the issuer to know who holds tokens at any time, eliminating anonymous or pseudonymous ownership. Transfer-restricted tokens add a mechanism that requires co-signatures: the token holder has one key and the platform has the other, meaning transfers can be blocked before they reach the blockchain. This enables preemptive enforcement of compliance policies rather than after-the-fact punishment.

Examples of enforceable policies include:

- Requiring KYC verification and taxpayer identification numbers before transfers
- Restricting sales to in-state residents for unregistered securities per SEC requirements
- Enforcing the RSA 421-B limit of no more than 5 distinct purchasers per year for unregistered securities within New Hampshire

Benefits of Real Estate Tokenization

Whitlock argued tokenization excels for monolithic assets that are difficult to divide, such as real estate. Fractional ownership via tokens allows smaller investors to

participate in real estate investing and helps keep rental income within local communities rather than flowing to out-of-state corporate landlords.

Rent-to-Own Model

Whitlock presented a tokenized rent-to-own model in which a tenant living in a property held by Porcupine Properties pays rent to the holding company. The rent (minus property expenses) is distributed as dividends to all token holders. Each month, the tenant also purchases additional tokens, eventually receiving dividend income that partially offsets rent. Over approximately 30 years, the tenant can accumulate enough tokens to redeem them and effectuate ownership of the property.

A case study using a $300,000 home showed that the rent-to-own model achieves parity with a 30-year mortgage at an effective interest rate of approximately 10.81%. While higher than typical mortgage rates, Whitlock noted this could be viable for individuals unable to obtain traditional mortgages due to credit or down payment barriers, and they could refinance once sufficient equity is built.

Broader Applications

Whitlock noted his technology stack is general-purpose and could be applied to equity in any company, corporate bonds, or municipal bonds. He discussed the potential to tokenize municipal bonds into smaller denominations accessible to everyday investors (e.g., $20 tokens vs. $1,000 bond minimums). Whitlock also distinguished between fungible tokens (like company shares) and non-fungible tokens (like car titles or property deeds).

Legislative Issue: Real Estate Transfer Tax

Whitlock identified a significant regulatory friction point: New Hampshire's real estate transfer tax statute treats transfers of interest in real estate holding companies the same as direct real estate transfers. This means every token transfer would technically trigger a taxable event, which would overwhelm the Department of Revenue Administration with thousands of forms for tiny amounts and is impractical because the tax amount cannot be extracted from token transactions (the AMP callback is binary: allow or deny).

Whitlock proposed a solution based on beneficial ownership thresholds: (1) if no beneficial owners (those holding more than 25%) exist before or after a transfer, no tax applies; (2) if at least one beneficial owner is the same before and after, no tax applies; (3) if beneficial owners change completely, tax the full fair market value of the property as a deemed change of control.

Q&A Discussion

Q (Jim Kish): Are you using smart contracts and oracles for administration? **A (Whitlock):** The AMP callback functions similarly to an oracle, but the Liquid Network does not support smart contracts in the Ethereum sense. It is more similar to Bitcoin with an additional confidential transaction layer.

Q (Oranburg): Have you considered whether New Hampshire's DAO LLC statute could be a useful vehicle for this? **A (Whitlock):** He began the project before the DAO bill passed and believes the LLC structure is sufficient for his purposes. A DAO LLC may require fully open-sourced technology, and while the governance layer could be open-

Video: youtu.be/32gO4c8Y91s

sourced, he preferred not to open-source the entire stack. Oranburg noted that as DAO statutes develop, New Hampshire could potentially optimize its statute to attract incorporations, similar to Delaware's approach with corporate law.

Q (Brandon Garod, AG's Office): How would consumers on the rent-to-own path make informed decisions about purchasing tokens? **A (Whitlock):** Consumers would need to consult financial advisors. Garod raised consumer protection concerns, noting that rent-to-own marketing creates an obligation to ensure consumers are on a viable path to actual ownership. He flagged issues including: ensuring consumers can assess feasibility at the outset, the distinction between owning tokens in the whole holding company versus owning a specific unit, and how condominium law might intersect with the model.

Q (Emelia Galdieri, Bank Commissioner): Is any of this actually happening, or is it theoretical? **A (Whitlock):** Theoretical. Commissioner Galdieri asked what happens when the rent-to-own model goes bad, whether a de facto mortgage has been created, how bankruptcy would be handled, and how a holder is cashed out at the end. Deputy Commissioner Moranti raised a tenant's eviction and the issuer's control of both the token's value and the property's value. Mr. Whitlock said a departing tenant would still receive dividends if the property is re-let, and that tenants build equity in the holding company rather than in a specific property.

V. COMMISSION REFLECTIONS & FUTURE TOPICS

Chair Ammon identified algorithmic stablecoins as an area the commission has not yet covered. Oranburg noted that the GENIUS Act completely excludes algorithmic stablecoins as a permitted option, requiring one-to-one reserve backing, but suggested it would be interesting to discuss whether a state could offer a non-GENIUS-compliant product, as states like Wyoming and North Dakota appear to be doing.

Jim Kish suggested broadening the topic to examine different types of reserve backing (Treasury-backed vs. deposit-backed vs. algorithmic) as a comprehensive subject.

Chair Ammon requested that commission members and the public recommend subject matter experts on these topics.

Public Comment: Risk Analysis

Karen Parker Feld (public) urged the commission to consider worst-case scenarios alongside the benefits of tokenization. She recommended the commission map out risks, including derivative trading on tokenized assets, rehypothecation, and speculative bubbles, before finalizing its report. She expressed concern about the implications for everyday homeowners if property tokens become tradeable and subject to speculation.

Brandon Garod encouraged members of the public to submit written concerns to the commission, noting that the public comment period is most useful before the report drafting phase begins. Chair Ammon indicated the commission aims to complete its overview and introduction phase by May, with the final report due in November 2026. Approximately three rounds of drafts are anticipated, with the final report approved by majority vote of the commission.

VI. ADJOURNMENT

A motion to adjourn was made and approved unanimously. **Meeting Adjourned:** Approximately 5:10 PM

NEXT MEETING

Date: March 10, 2026

Time: 10:00 AM – 12:00 PM

Location: Banking Department conference room, Concord, NH

Planned Presenters: BitGo (rescheduled from January), Conference of State Bank Supervisors (CSBS)

ACTION ITEMS

Item	Responsible	Status
Send presentation slides	Julie Lascar (Digital Asset)	Completed
Follow up on DTCC implementation details, community bank activity, real estate/government use cases, and validator requirements	Julie Lascar (Digital Asset)	Completed
Send presentation slides	Matt Whitlock (Porcupine Properties)	Completed
Post slides to commission portal	Keith Ammon	Completed
Confirm BitGo and CSBS presenters for March meeting	Keith Ammon	Completed
Prepare meeting minutes	Keith Ammon	Completed
Complete overview/introduction phase by May 2026	Commission	Ongoing

COMPILATION NOTES

These minutes were compiled from the official transcript of the February 10, 2026 meeting using Claude AI. The transcript was processed to correct names, spelling, and formatting while preserving the substantive content and discussion from the meeting.

Respectfully submitted,

Keith Ammon, Chair

Approved on March 10, 2026.

Corrected by vote of the Commission, October 29, 2026.

NEW HAMPSHIRE STABLE TOKEN STUDY COMMISSION

Meeting Minutes

Date: March 10, 2026 | **Time:** 10:05 AM – Approximately 12:07 PM

Location: Banking Department Conference Room, Concord, NH (In-person with remote participation via Microsoft Teams)

ATTENDANCE

Commission Members Present

- Keith Ammon, Chair (Hillsborough 42)
- Jim Kofalt, Vice Chair (Speaker Pro Tem, Hillsborough 32)
- Michael Moranti (Deputy Commissioner of Banking, Banking Commissioner's designee)
- Jim Kisch (President and CEO, Passumpsic Bank; Banking representative)
- Brandon Garod (Senior Assistant Attorney General, AG's designee)
- Katie Taylor (Staff Attorney, Bureau of Securities Regulation, Secretary of State's designee)
- Seth Oranburg (Professor of Law, UNH Franklin Pierce School)
- Andy Schwab (Blockchain industry representative, remote)
- Dan Nuñez Cohen (Head of Policy, Crypto.com, remote)

Commission Members Absent

- Sen. Tara Reardon
- Sen. Daryl Abbas
- Chris McAleer (Representative, Carroll County District 2)

Other Officials and Members of the Public

- James Karas (Director, Abandoned Property Division, State Treasury; attending on behalf of State Treasurer Mezzapelle)
- Shaun Thomas (Lobbyist, Demers, Prasol & Thomas Inc.; representing Bank of America)
- Isaac [surname not audible] (Derry, NH; developer policy interest, no organizational affiliation)
- Karen Parker Feld (Kensington, NH; independent participant; finance background)
- Woody Canaday (member of the public, remote; develops courses at AIL and Osher)

Presenters

- Yevgeny Shrago, Senior Director of Regulatory Policy, Conference of State Bank Supervisors (CSBS)
- Eugene Hahr, Vice President of Product (Stablecoins and Fiat), BitGo
- Mike Gross, BitGo

I. OPENING & COMMISSION BUSINESS

Chair Ammon called the meeting to order at 10:05 AM. Commission members, presenters, and members of the public provided brief introductions. James Karas noted he was attending as the Treasury designee on behalf of State Treasurer Mezzapelle.

Chair Ammon noted the agenda is posted at nh-token-commission.org and that presentation slides are available there. No changes to the agenda were proposed. The agenda was accepted by unanimous consent.

Approval of February 10, 2026 Minutes

Chair Ammon presented the February 10, 2026 meeting minutes for approval. Commissioner Moranti identified a correction: a statement near the end of the minutes referencing 14 years of experience at the Banking Department was incorrectly attributed to him. Moranti indicated that statement was likely made by Bank Commissioner Galdieri. The commission agreed to either strike the statement or reassign the attribution.

A motion to approve the minutes with that correction was made and seconded. Motion carried, all in favor, none opposed.

II. PRESENTATION: FEDERAL STABLECOIN REGULATORY FRAMEWORK

Presenter: Yevgeny Shrago, Senior Director of Regulatory Policy, Conference of State Bank Supervisors (CSBS)

Duration: Approximately 50 minutes including Q&A

Note: Sabrina Bergen, the originally scheduled CSBS presenter, was unable to attend; she was staffing the CSBS CEO at the American Bankers Conference. Shrago noted the presentation assumed commission familiarity with the Genius Act and focused on design choices and open questions relevant to state policymakers.

Genius Act Implementation Timeline

The commission is approaching the one-year post-enactment milestone, which concentrates several key deadlines:

- **July 2026:** Federal banking agencies (OCC, FDIC, Federal Reserve) and Treasury are required to issue implementing regulations. As of the meeting date, only the OCC had published a proposed rulemaking; FDIC, Federal Reserve, and Treasury rules were expected within weeks.
- **January 18, 2028:** Initial deadline for states to submit stablecoin regulatory frameworks to Treasury for certification as substantially similar to the Genius Act.

CSBS views the July deadline as precatory for states but binding for federal agencies. Treasury's forthcoming rulemaking will not establish a regulatory framework; instead it will set the substantial similarity standard for states and address Bank Secrecy Act and anti-money laundering requirements for stablecoin issuers, as well as limitations on foreign issuers. CSBS has encouraged Treasury to treat the Genius Act as a floor, grant broad deference to states, and avoid binding states to any specific federal framework design choices.

OCC Notice of Proposed Rulemaking

The OCC issued a 367-page NPRM approximately ten days prior to the meeting, containing more than 200 questions. Key parameters:

- **Comment deadline:** May 1, 2026
- **Final rule expected:** June 18, 2026
- **CSBS comment letter:** Expected approximately two months from the meeting date

Shrago described the rulemaking as carefully considered, with the OCC explicitly signaling openness to feedback. He framed the OCC's design choices as signposts for what the FDIC and Federal Reserve may adopt for state-chartered bank subsidiaries, and as areas where states retain discretion to make different choices. Shrago identified six primary areas of interest for state policymakers.

1. Permissible Activities

The OCC defined permitted activities as minting and redeeming stablecoins, custodying stablecoins, managing reserves, and directly supporting activities. Supporting activities include levying redemption fees, paying gas fees on behalf of customers, acting as principal and agent for stablecoin distribution, and a general catch-all for other directly supporting activities, which the OCC indicated should be read narrowly.

A rule of construction permits OCC trust charters and national bank subsidiaries to engage in activities otherwise permitted by law (e.g., fiduciary activities), which Shrago noted is in some tension with the Genius Act's stated activity limitations for stablecoin issuers. An anti-evasion provision signals the OCC will look through form to substance when assessing compliance.

Outstanding questions: whether non-bank OCC issuers can engage in digital asset service provider activities beyond issuance, and whether such issuers must retain a state license to engage in those activities, since the OCC declines to grant that authorization itself.

2. Yield

The OCC established a rebuttable presumption that an issuer is paying yield to holders if it has a contract with an affiliate or related third party and that party has an agreement to pay yield to holders. Yield is defined broadly to include cash, tokens, or other consideration.

The presumption does not apply to yield paid on other stablecoins from the same issuer in separate white-label arrangements, and profit sharing between issuer and white-label

provider is permitted. The OCC does not specify what evidence is sufficient to rebut the presumption or define the required degree of distance from the issuer.

Shrago characterized this provision as wading into an active legislative debate. The most recent Senate Clarity Act markup included a nominal prohibition on yield but permitted rewards for transactions or platform participation. A bipartisan Tillis amendment would have limited the restriction to payment rewards, but withdrawal of industry support led to cancellation of the markup. The American Bankers Association was actively lobbying against yield at the time of the meeting. Shrago noted states likely retain design flexibility around third-party yield structures, subject to Treasury's eventual substantially similar determination.

3. Reserve Assets and Redemption

Reserve asset requirements:

- **Reserves valued at fair value; outstanding issuance valued at par** (to require reserve maintenance regardless of any de-peg event, designed to prevent runs)
- Issuers must demonstrate operational capability to monetize all reserve assets
- Asset diversification: approximately 10% in demand deposits or money market equivalents accessible through the Federal Reserve; 30% accessible within five days; maximum 40% at any single institution
- Average weighted maturity of the entire portfolio: 20 days (even though the Genius Act permits individual Treasury holdings up to 93 days maturity)
- Issuers above approximately $25 billion must hold roughly 0.5% of reserves in insured deposits; at Circle's current reserve level this could require relationships with approximately 1,500 banks
- If an issuer fails to meet reserve requirements for 15 consecutive business days, it must liquidate and cease business

Redemption rules:

- Issuers must redeem at 1:1 within two business days
- A seven-day gate applies if redemption demand exceeds 10% in a single day, subject to OCC approval
- Redemption fee disclosure requirements apply

The OCC limits rehypothecation of reserve assets to cash reserves only. States may make other choices, and it is unclear how the OCC will treat an OCC issuer that holds reserves at a state custodian permitted to treat other reserve assets as cash on deposit.

4. Risk Management, Audit, and Supervision

The OCC adopted standard bank risk management frameworks for stablecoin issuers, including third-party oversight requirements, IT security program requirements, a 12-month examination cycle (extendable to 18 or 36 months for low-risk issuers), quarterly reporting equivalent to call reports, and change-in-control procedures mirroring national bank requirements.

Video: youtu.be/u33eAPMgUI8

Consumer protection: The Genius Act explicitly applies state and federal consumer protection laws to all issuers. The OCC characterized these provisions as self-executing but declined to define their scope or specify compliance standards. Shrago flagged that the OCC has exclusive examination jurisdiction and has signaled a continued interest in preempting state consumer protection laws as applied to OCC trust charters and national bank subsidiaries.

5. State Qualified Issuers

Two provisions specifically affect state-chartered issuers:

- Issuers crossing $10 billion must notify the OCC within five days and submit a capital analysis within 270 days. Waiver is presumed only when required by statute; otherwise assessed case-by-case using statutory factors. CSBS will seek greater predictability and transparency on waiver decisions.
- The OCC may intervene in unusual and exigent circumstances to order a state issuer to stop issuance. CSBS would like advance notice to the state regulator made explicit before any such intervention.

6. Capital and Operational Backstop

- Minimum $5 million common equity tier 1 capital; no intangible asset deduction
- Ongoing capital commensurate with all risks faced by the issuer
- Operational backstop: 12 months of total expenses, held separately from reserve assets
- National trust charters may elect to calculate capital under the issuer framework whether or not they issue stablecoins

Foreign issuers face the same reserve, reporting, and yield prohibition requirements as domestic issuers. Reserves must be held in U.S. financial institutions sufficient to cover U.S. customer demand, though operationalizing this requirement may necessitate aggressive KYC and transaction tracking. Foreign issuers must consent to federal jurisdiction but are not explicitly required to consent to state jurisdiction.

FDIC Application Rulemaking

The FDIC issued an application-only rulemaking with a May 17, 2026 comment deadline. Notable requirements include: a detailed description of all planned business activities (generic “all permissible activities” descriptions are explicitly unwelcome); three-year financial projections with reserve management plans; all BSA/AML, custody, and transaction processing policies; and an auditor engagement letter for all applicants, even though the Genius Act only requires audits for issuers above $25 billion. The FDIC’s review clock runs from its own completeness determination (up to 30 days after submission), whereas the OCC’s clock runs from the submission date.

NCUA Application Rulemaking

The NCUA largely follows the FDIC on timelines. Additional provisions: federally insured credit unions are prohibited from investing in stablecoin issuers licensed by other regulators; and the NCUA adds operational compliance and technology risk

management requirements as application criteria beyond the statutory factors used by the OCC and FDIC.

State Legislative Landscape

Shrago noted Treasury has not yet released the substantial similarity framework, which CSBS has urged Treasury to publish quickly given state legislative calendar constraints. He identified four emerging state framework models:

- **Virtual currency license model** (New York, Illinois, California, Louisiana): State license covering digital asset activities generally; capital, liquidity, and supervision requirements calibrated to risk profile.
- **Special purpose depository institution (SPDI) model** (Wyoming, Nebraska): Uninsured state-chartered depositories limited to non-lending digital asset activity. Note: if SPDIs became insured depositories, they would lose eligibility as state issuers under the Genius Act.
- **State-level Genius Act** (Florida, Georgia): Incorporates Genius Act provisions into state law with detailed permissible activity rules and more developed resolution frameworks. Florida's bill was reported as having passed the Senate and awaiting the governor's signature.
- **Regulator delegation model** (Maryland, Alabama): Creates a licensing regime and legal category of stablecoin issuer, and delegates authority to issue Genius Act-compliant rules to the state regulator. Indiana's bill using this approach failed during the week of the meeting. Treasury has been encouraging states to consider this model.

Additional state activity: Alabama and Idaho have bills permitting state acceptance of stablecoin payments to vendors and contractors; Hawaii is considering a bill permitting state banks to custody digital assets. Shrago also noted emerging state stablecoin consortia, including the Independent Community Bankers of Texas (pursuing a shared tokenized deposit platform), Custodia Vantage Bank (piloting a token functioning as both stablecoin and tokenized deposit, open to banks and credit unions), and a partnership between Metallicus blockchain and a Minnesota CUSO for white-label stablecoin and digital asset custody.

Q&A Discussion

Q (Oranburg): Why is the yield debate so contentious, and what is the safety argument for prohibiting yield? **A (Shrago):** Community and larger banks view stablecoin yield as a potential existential threat to their deposit bases, particularly uninsured deposits. For stablecoin issuers, yield is the key to broad ecosystem adoption. On safety, yield creates net interest margin pressure that could push issuers to maintain unrealistically high rates to avoid deposit flight, threatening longer-term solvency. More broadly, pushing deposits into an uninsured system that lacks bank-equivalent capital requirements recreates shadow banking run risks.

Q (Oranburg): Could a yield limit rather than an outright prohibition address most of the safety concern? **A (Shrago):** Possibly. A wide range of structural answers should be considered. The OCC's rebuttable presumption leaves space for some third-party yield

Video: youtu.be/u33eAPMgUI8

payment depending on the degree of issuer distance, and states likely have design flexibility around how yield-like returns are structured, subject to Treasury's substantially similar determination.

Q (Oranburg): Does New Hampshire have flexibility on yield or yield-like alternatives? **A (Shrago):** Ultimately a Treasury question. There is space, particularly in the third-party world, for states to structure arrangements that may not look like yield; the key question is where Treasury lands relative to the OCC's approach.

Q (Ammon): What is the dependency between OCC/FDIC/Treasury rulemaking and passage of the Clarity Act? **A (Shrago):** The rulemaking processes are largely independent. The main intersection is the yield question: if Congress passes a Clarity Act provision that differs from the OCC's approach, the OCC would need to conform its rule. BSA/AML requirements are also expected to come from Treasury separately. Otherwise, Genius Act implementation proceeds regardless of Clarity Act status.

Q (Ammon): How is programmability addressed in the OCC framework? **A (Shrago):** The OCC does not address smart contracts directly, consistent with its technology-neutral orientation. Issuers using smart contracts or third-party programmability tools would need to ensure those tools meet relevant IT security and risk management requirements, and the OCC would assess compliance through third-party oversight examinations.

Q (Ammon): Are there any blockchain or technology selection requirements in the safety and soundness framework? **A (Shrago):** Not directly. The OCC is blockchain-agnostic, but would expect issuers to describe their blockchain selection and explain how it supports safety and soundness requirements as part of the application process.

Q (Ammon): What is the justification for the $10 billion threshold, and is it inflation-adjusted? **A (Shrago):** The threshold is not inflation-adjusted. It appears to have been drawn from existing regulatory thresholds without a specific analytical foundation; at present, only two stablecoin issuers globally exceed $10 billion. For New Hampshire, if an issuer in the state crossed $10 billion, the state would share jurisdiction with the OCC rather than lose it. A legal challenge to that framework is possible. Wyoming may have a stronger presumption of waiver given its stable token predated the Genius Act's enactment.

III. PRESENTATION: STABLECOIN INFRASTRUCTURE AND MARKET MECHANICS

Presenter: Eugene Hahr, Vice President of Product (Stablecoins and Fiat), BitGo; with Mike Gross, BitGo

Duration: Approximately 55 minutes including Q&A

Note: This presentation was a custom preparation for the commission, focused on New Hampshire-relevant considerations.

Company Overview

BitGo was founded in 2013 by CEO Mike Belshe, one of the inventors of multi-signature Bitcoin wallets. The company operates as an OCC-chartered digital asset trust bank

and provides digital asset infrastructure including qualified custody, trading, lending, staking, collateral management, and stablecoin-as-a-service. BitGo custodies over $100 billion in digital assets, serves clients across more than seven regulated entities globally (including Europe, Asia, and the Middle East), and was publicly listed on the New York Stock Exchange in January 2026. Prior to joining BitGo, Eugene Hahr was the founding head of product at Brassica, a real-world asset tokenization platform with a Wyoming state charter trust company, which BitGo acquired in 2024.

BitGo's stablecoin-as-a-service products include USD1, issued in partnership with World Liberty Financial, and infrastructure support for SoFi Bank's recently announced SoFi USD stablecoin. BitGo also issues WBTC, a Bitcoin-backed wrapped asset on Ethereum, operational since 2018 with no incidents.

Mike Gross noted that BitGo is the custodian for New Hampshire's Bitcoin-backed municipal bond.

Why Stablecoins Matter

Hahr identified the core value proposition of stablecoins as dependent on network effects: a payment instrument is only as useful as the number of entities willing to accept and remit it. Subject to sufficient adoption, key benefits include:

- 24/7 settlement, particularly relevant as tokenized real-world assets on-chain will require on-chain dollars to settle at the same speed
- Lower costs by reducing intermediary fees in remittances and direct payments
- Cross-border efficiency compared to SWIFT and correspondent banking
- Immutable payments relevant to AI agent transactions, where irreversibility (unlike ACH or credit card chargebacks) provides certainty of execution
- On-chain auditability and transparency

Types of Stablecoins

Hahr described four stablecoin categories consumers may encounter, noting that all are commonly marketed under the "stablecoin" label despite having materially different risk profiles:

- **Fiat-backed (1:1):** Each token backed by one unit of equivalent fiat currency held in reserve. Most regulated category; redeemable with the issuer; the model endorsed by the Genius Act.
- **Asset-backed:** Backed by crypto or real-world assets (e.g., U.S. Treasuries, gold). Often yield-bearing, which can blur the line into securities. Some peg to $1.00; others increment in value like a fund share.
- **Algorithmic:** Value maintained through code and mint/burn incentive mechanisms rather than held reserves. No direct asset redemption guarantee. Examples still operate in decentralized finance applications outside the U.S. market.
- **Hybrid:** Combinations of the above, varying widely in implementation.

Video: youtu.be/u33eAPMgUI8

Hahr emphasized that consumers often cannot easily distinguish between these categories from marketing materials, names (many include “USD”), or point-of-sale disclosures. Questions consumers rarely know to ask include: Who is the issuer? What is in the reserve? Do I have direct redemption rights? Is this a Genius Act-compliant asset?

Primary and Secondary Market Peg Mechanics

Hahr provided a detailed explanation of how peg stability is maintained across primary and secondary markets, which commission members found particularly valuable.

Primary market: Eligible institutions (typically large institutional market makers) have direct contracts with the issuer granting redemption rights. They can send stablecoins to the issuer and receive dollars in return within the contractually specified timeframe. This backstop is not available to retail consumers.

Secondary market: Exchanges and decentralized exchanges maintain liquidity through market-making activity. Market makers act as arbitrageurs: when a stablecoin de-pegs (e.g., drops to $0.95), they buy at the discounted price and redeem at par through the primary market, profiting from the spread and in doing so restoring the peg.

Stress scenario: In a negative news event (e.g., a reserve bank failure), sell pressure in the secondary market may temporarily de-peg the stablecoin. The first automatic correction mechanism is arbitrage activity. This mechanism depends on (1) the issuer having sufficient liquidity to honor primary market redemptions, and (2) market makers maintaining sufficient capital and confidence to continue arbitraging. If confidence in the issuer erodes, market makers may reduce or exit their liquidity provision, causing a cascading spread widening — the dynamic observed in the Terra/Luna collapse. Fiat-backed stablecoins are more resilient because the primary market backstop is a known, direct redemption right against a tangible asset pool.

Consumer Protection Considerations

Hahr identified several gaps in current consumer understanding and disclosure:

- Consumers on secondary markets are not redeeming with the issuer; they are buying and selling at market prices, with no direct redemption right
- The name of a stablecoin (particularly “USD” naming conventions) does not reliably indicate backing or Genius Act compliance
- Issuers can be U.S. entities, offshore companies, U.S. territories, or software protocols with no identifiable entity

BitGo’s general considerations for the commission (not formal recommendations):

- **1.** Aligning with the Genius Act framework provides a useful foundation for consumer clarity.
- **2.** Requiring clear asset classification at point of sale (e.g., labeling Genius Act-compliant assets as such) would help consumers distinguish regulated from unregulated products.

Video: youtu.be/u33eAPMgUI8

- **3.** Standardized consumer disclosures for reserve composition, audit/attestation frequency, absence of FDIC insurance, and secondary market risk.
- **4.** Requiring reserve assets to be held with qualified custodians provides regulatory oversight without banning innovation.
- **5.** Supporting non-crypto-native community banks in receiving, remitting, and potentially issuing stablecoins as a way to expand network effects from within the existing banking system.

Q&A Discussion

Q (Kisch): How do tokenized deposits fit into this ecosystem? **A (Hahr):** Tokenized deposits represent a bank's decision to create on-chain tokens representing a subset of its deposits, typically for internal efficiency, interbank settlement, or programmatic use cases. Unlike payment stablecoins, tokenized deposits are generally not intended to be permissionless or publicly transferable; large banks like JPMorgan are exploring private chain models for this reason. A future convergence is plausible: a bank could back a stablecoin with its tokenized deposits, creating on-chain transparency into reserve composition. However, a bank-issued stablecoin backed by fractional reserve deposits would be less fully reserved than a non-bank payment stablecoin, raising structural questions about how reserve requirements would apply.

Q (Ammon): The Genius Act's $10 billion threshold may silo liquidity into small state-chartered networks. How does interoperability develop in practice? **A (Hahr):** Two possible paths: (1) consolidation around a few large winners that eventually adopt consortium-like governance; or (2) a world with many issuers connected through clearing mechanisms analogous to check clearinghouses or correspondent banking relationships. Infrastructure providers are already developing multi-issuer clearing approaches. Decentralized bridging protocols also exist for asset-to-asset conversion, though they are currently used primarily by trading desks rather than retail consumers.

Q (Oranburg): For AI agents, is immutability (inability to reverse) the key property of stablecoin payments, rather than price determinism? **A (Hahr):** Correct. The relevant property is immutability: a blockchain transaction, once confirmed, cannot be reversed by an intermediary the way ACH and credit card transactions can be disputed and clawed back. This matters for AI agents because the liability framework for agent-initiated transactions is unsettled; immutable settlement removes the reversal risk. Broad direct agent access to mint/burn could, however, create contagion risk if many AI agents operating on similar models simultaneously triggered large redemption events.

Q (Kofalt): Are there tax advantages New Hampshire could offer around stablecoin transactions, given the state's absence of income, sales, and property taxes? **A (Hahr):** Stablecoins currently fall under cost-basis rules at the federal level, and because price variation is minimal, tax implications for most stablecoin transactions are negligible. New Hampshire could potentially take a policy position treating stablecoin transactions as cash-equivalent for state tax purposes. This merits further analysis as part of the commission's work.

IV. COMMISSION REFLECTIONS & FUTURE TOPICS

Seth Oranburg flagged a potential scrivener's error in the commission's enabling statute, where a reference to "limited liability company" may have been intended to read "limited partnership." He agreed to send Chair Ammon the specific statutory citation for follow-up.

Oranburg also raised consumer protection as an ongoing priority, noting that the variety of assets marketed as "stablecoins" with similar naming conventions but materially different risk profiles presents a clear disclosure problem. He suggested the commission explore whether labeling or classification requirements could be recommended as part of its final report.

Chair Ammon shared a new analysis folder added to the commission portal at nh-token-commission.org containing: the OCC NPRM executive summary, a side-by-side comparison of Florida's and Wyoming's stablecoin legislation, and the Federal Reserve Bank of Boston working paper (SRA 26-01) on stablecoin vulnerability frameworks, which Bank Commissioner Galdieri had forwarded prior to the meeting. Chair Ammon indicated Georgia would be added to the legislative comparison.

Karen Parker Feld (public) requested a future presentation slot to provide a macro-level analysis of what the next phase of securitization and tokenization might mean for asset markets, economic policy, and consumer protection. Chair Ammon invited her to submit a written outline and confirmed she could present in May.

Next Meeting

A motion to schedule the next meeting for Monday, April 6, 2026 at 10:00 AM was approved without objection.

Planned presenters: SoFi (stablecoin banking integration); Chainlink (cross-chain oracle infrastructure and blockchain interoperability).

V. ADJOURNMENT

A motion to adjourn was made and approved unanimously.

Meeting Adjourned: Approximately 12:07 PM

NEXT MEETING

Date: April 6, 2026

Time: 10:00 AM

Location: Banking Department Conference Room, Concord, NH

Planned Presenters: SoFi; Chainlink

ACTION ITEMS

Item	Responsible	Status

Video: youtu.be/u33eAPMgUI8

Send presentation slides	Yevgeny Shrago (CSBS)	Pending
Send presentation slides	Eugene Hahr / Mike Gross (BitGo)	Pending
Post slides to commission portal	Keith Ammon	Pending
Add Georgia to Florida/Wyoming legislative comparison on commission portal	Keith Ammon	Pending
Send scrivener’s error statutory citation	Seth Oranburg	Pending
Submit written macro analysis outline	Karen Parker Feld	Pending
Confirm SoFi and Chainlink presenters for April meeting	Keith Ammon	Completed
Prepare meeting minutes	Keith Ammon	Pending

COMPILATION NOTES

These minutes were compiled from the official transcript of the March 10, 2026 meeting using Claude AI. The transcript was processed to correct names, spelling, and formatting while preserving the substantive content and discussion from the meeting.

Respectfully submitted,
Keith Ammon, Chair

Approved on April 6, 2026.

NEW HAMPSHIRE STABLE TOKEN STUDY COMMISSION

Date: April 6, 2026

Time: 10:04 AM – 12:08 PM

Location: New Hampshire Banking Department, Conference Room, Concord, NH

In-person with remote participation via Microsoft Teams

Minutes

ATTENDANCE

Commission Members Present

- Keith Ammon, Chair (Hillsborough 42)
- Jim Kofalt, Vice Chair (Speaker Pro Tem, Hillsborough 32)
- Tara Reardon (New Hampshire Senate, District 15)
- Seth Oranburg (Professor of Law, UNH Franklin Pierce School)
- Brandon Garod (Senior Assistant Attorney General, AG's designate)
- Katie Taylor (Staff Attorney, Bureau of Securities Regulation, Secretary of State's designate)
- Michael Moranti (Deputy Commissioner of Banking, Banking Commissioner's designate)
- Jim Kisch (Passumpsic Bank, banking industry representative, remote)
- Andy Schwab (Blockchain industry representative, remote)
- Dan Nuñez Cohen (Head of Policy, Crypto.com, remote)

Commission Members Absent

- Sen. Daryl Abbas
- Chris McAleer (Carroll County District 2)

Other Officials and Members of the Public

- Karen Parker Feld (visitor; planned presenter for May meeting; 30+ years in financial services and economics; Stanford PhD)
- Christy Merrill (New Hampshire Bankers Association)
- Ryan Hale (New Hampshire Bankers Association)
- Woody Canaday (member of the public, finance background)
- James Karas (visitor, NH State Treasury)
- Jackson Bouley (lobbyist, Dennehy-Bouley)
- Carter Snay (NH Blockchain Council Board; UNH Interoperability Lab)
- Jeffrey Lapak (UNH Interoperability Lab)

Presenters

- Colin Cunningham (Head of Tokenization & Alliances, Chainlink Labs, remote)
- Mark Gaal (Head of US Public Sector Sales, Chainlink Labs, remote)
- Simon Baksys (Chief Business Officer, LayerZero Labs, remote)

- Niall (Customer Success Lead, LayerZero Labs, remote)
- Anthony Apollo (Executive Director, Wyoming Stable Token Commission, remote, joined for Q&A)

I. OPENING & COMMISSION BUSINESS

Chair Ammon called the meeting to order at 10:04 AM at the New Hampshire Banking Department's conference room and thanked the Banking Department for hosting. Members and guests went around the room and remote participants for brief introductions of their backgrounds and roles.

The Chair noted there were no proposed changes to the agenda. He brought the March 10, 2026 meeting minutes to a vote, having incorporated a previously-discussed correction. The minutes were approved by voice vote with no opposition.

The Chair reported that SoFi, which had been scheduled alongside Chainlink, requested to defer because their legal department had not completed its review of the materials in time. LayerZero Labs was arranged on short notice to fill the SoFi slot, joining the previously-scheduled Chainlink Labs presentation. The Chair noted both companies occupy adjacent positions in the blockchain interoperability and stable token infrastructure space and would inform the Commission on similarities, differences, and stable token / real-world asset implementation considerations.

II. PRESENTATION: CHAINLINK LABS – ORACLE INFRASTRUCTURE FOR STABLECOINS AND TOKENIZED ASSETS

Presenter: Colin Cunningham, Head of Tokenization & Alliances, Chainlink Labs

Joined by: Mark Gaal, Head of US Public Sector Sales

Duration: Approximately 45 minutes including Q&A

Company Background

Chainlink's original white paper was authored in 2017 by Sergey Nazarov and Ari Juels; the protocol went live in 2019. CCIP (Cross-Chain Interoperability Protocol) launched in 2023. The team is approximately 600 people. Since 2019 the network has enabled approximately $29 trillion of total economic activity and is integrated with 2,600+ projects and over 50,000 developers.

Why Chainlink Exists

Digital assets do not natively connect to traditional global economic data and systems, and assets are typically siloed to a single blockchain. Chainlink positions itself at the bridge between traditional finance and digital finance across five layers: data, interoperability, compliance, privacy, and orchestration tools. Chainlink became the first data-and-interoperability oracle platform to achieve ISO 27001 and SOC 2 compliance.

Policy and Government Engagement

- Cited in the White House digital asset report for the importance of oracles in powering on-chain markets
- U.S. Department of Commerce partnership to bring macroeconomic data on-chain
- Increasing engagement at federal and state policy layers in 2025

Reference Customers and Use Cases

- Connexus (J.P. Morgan) integrated with Ondo for real-time settlement of tokenized U.S. Treasuries against JPM USD deposits
- Mastercard customer transactions over blockchain
- Visa / Hong Kong Monetary Authority cross-border transaction work
- SWIFT / UBS Asset Management integration of tokenized assets into SWIFT's existing payment systems

Stable Token Focus: Four Pillars

The stablecoin market sits at approximately $316 billion. Cunningham presented four pillars Chainlink supports for any tokenized asset, with stable tokens as the primary near-term focus:

- Data and Proof of Reserves – verifies that on-chain supply matches off-chain reserves; "Secure Mint" prevents minting beyond verified backing
- Multi-chain Distribution via CCIP – reaches approximately 97% of cross-chain value
- Built-in Compliance – the Automated Compliance Engine (ACE) plugs into KYC/AML, jurisdictional rules, and policy controls
- Private Transactions – "Confidential Compute" unlocks privacy for digital assets on public chains via the Chainlink runtime environment

Q&A Discussion

Q (Oranburg): Where does liability sit when an oracle fails, and how do corporate vs. DAO governance structures of service providers affect recourse?

A (Cunningham): Chainlink uses fault-tolerant, decentralized oracle networks that reach consensus across many node operators, which mitigates single-point failures. Specific liability and corporate-structure questions will be referred to Chainlink's legal team for follow-up. Oranburg added that the Commission should consider corporate vs. DAO domicile when evaluating service providers because it shapes the State's recourse in the event of a failure.

Q (Ammon): What share of Chainlink's code is open source?

A (Cunningham): Believes the majority is open source; will confirm with the technical team and follow up.

Q (Kisch): How does Chainlink's proof of reserves apply to tokenized deposits, and is the banking ecosystem an emerging vertical?

A (Cunningham): Tokenized deposits are often a 1-for-1 case and easier to validate. Stablecoins have driven proof-of-reserve adoption because reserve quality and "stability" definitions vary widely. Banking integration is an active growth area; Cunningham and Gaal offered to set up a follow-up call with Kisch on banking applications.

Q (Ammon): If New Hampshire stood up a stable token, what is the cost model for working with Chainlink – subscription, integration, ongoing compliance?

A (Cunningham / Gaal): Flexible. Engagement can range from handing over technology, to subscription-based out-of-the-box products, to a middle-ground custom integration on the Chainlink runtime environment. Programmatic proof-of-reserve attestations are typically substantially cheaper than recurring third-party audit attestations.

Q (Ammon): How is proof of reserves implemented across reserve buckets (cash, Treasuries, etc.) – do you interface directly with the bank holding the cash?

A (Cunningham): Chainlink integrates with the issuer's designated source of truth, which may be the custodian, a regulated fund administrator, or the bank itself, depending on the issuance structure. The product piggybacks on Chainlink's oracle network.

Chair Ammon noted New Hampshire's DAO legal personhood statute and flagged the upcoming UNH hackathon on April 18–19 in Durham, organized in cooperation with the NH Secretary of State's office, focused on the DAO registry.

III. PRESENTATION: LAYERZERO LABS – INTEROPERABILITY PROTOCOL, WYOMING IMPLEMENTATION & THE "ZERO" LAYER-ONE BLOCKCHAIN

Presenter: Simon Baksys, Chief Business Officer, LayerZero Labs

Joined by: Niall, Customer Success Lead

Duration: Approximately 50 minutes including Q&A

Company Background

- Approximately 6 years old; about 160 employees
- Headquarters in Vancouver, BC; commercial office in New York City; engineering office in Hong Kong
- Approximately $280 million raised at a $3 billion valuation (2021); investors include Sequoia, a16z, PayPal, Franklin Templeton, Temasek, and Samsung
- All three co-founders are University of New Hampshire alumni
- Approximately 80% market share of cross-chain messaging volume; zero exploits to date

Interoperability Approach

Earlier cross-chain bridges relied on wrapping assets (minting a synthetic representation on the destination chain), which created smart-contract risk and contributed to approximately $2.1 billion in industry exploits. LayerZero replaced this with general message passing: treating cross-chain transfers as native byte-array data, enabling native mint/burn rather than wrapped assets. The protocol now connects approximately 170 blockchains (EVM and non-EVM) and 700+ applications, has secured roughly $250 billion of value transferred to date, and processes roughly $15–$20 billion cross-chain volume per month and approximately 20,000 transactions per day.

Stablecoin and RWA Coverage

Approximately 71% of stablecoin supply is issued via LayerZero, including Tether, PayPal's PYUSD, Paxos' USDG, and bridge/Stripe stablecoins. The protocol is also used for tokenized equities (Ondo, Dinari, an in-progress Robinhood implementation) and tokenized funds (Franklin Templeton's BENJI fund). The console and value-transfer API products provide a tokenization platform layer over the underlying messaging protocol, and an OFT (Omnichain Fungible Token) standard allows assets to natively mint and burn across chains.

Decentralized Verifier Networks (DVNs)

LayerZero's DVN architecture allows asset issuers to own and configure the security model for each cross-chain transaction. Issuers may select among 60+ DVNs (operated by parties such as Google, Paxos, Deutsche Telekom, Fireblocks, and Fidelity's Center for Applied Technology) or run their own. Compliance logic – whitelisting, blacklisting, sanctions screening, freeze controls – can be enforced at the DVN layer.

Wyoming Frontier Stable Token (FRNT) Implementation

LayerZero served as smart contract partner to the Wyoming Stable Token Commission. Key features of the deployment:

- Live in production (not a pilot) across 6 chains, EVM and non-EVM (including Solana)
- Built on the Fireblocks ERC-20F token standard for compliance enforcement (whitelist / blacklist / interdiction) and on LayerZero's OFT standard for native cross-chain mint and burn
- 1-for-1 cross-chain transfers without liquidity pools or slippage
- Wyoming State operates a required DVN that must verify every cross-chain transaction; LayerZero Labs and Canary operate additional DVNs
- Typical cross-chain transfer time: ~30 seconds to ~2 minutes; demonstrated example moved FRNT from Hedera to Ethereum in 1 minute 31 seconds
- Distribution available on day one via the Stargate bridging application and the LayerZero value-transfer API

"Zero" Layer-One Blockchain (Announced February 10, 2026)

LayerZero unveiled its own L1 blockchain, "Zero," backed by 2+ years of stealth research and 20+ PhDs from Carnegie Mellon, MIT, and Stanford. Headline characteristics:

- Cost: approximately 1/10,000 of a cent per transaction
- Throughput: 2 million transactions per second at launch, scalable to 5–10 million
- Demonstrated live validation of 30 million Ethereum transactions in 27 seconds on 150 Raspberry Pi validators
- Compatible with EVM, SVM, Move VM, and any virtual machine; ZeroOS allows compiling off-chain code (e.g., an exchange) into a Linux binary on-chain
- Architecture uses heterogeneous validators (validators do not replicate full state) and applies zero-knowledge proofs at the block-producer level (Jolt prover, jointly developed with a16z)
- Three zone types: General Purpose (EVM-compatible), Trading (sub-millisecond latency for capital markets), and Payments (settlement, FX between stablecoins)
- Strategic partners and investors: Citadel Securities, Intercontinental Exchange / NYSE (on-chain ATS), DTCC, Tether, Google (agentic payments), Cathie Wood / ARK Invest, and NEXON
- Targeted launch: fall 2026

Q&A Discussion

Q (Ammon): How might an interstate compact work for stablecoins? Could states share liquidity while each retaining sovereign control over its own issuance and capturing the public-good revenue from its own coin?

A (Baksys): Each state can replicate Wyoming's model and operate its own DVN to sign cross-chain transactions for its own coin. Achieving 1-for-1 interoperability between two state coins would typically require a liquidity pool. An alternative model is a "shared open issuance layer" (analogous to Bridge's open issuance layer) with shared reserve accounts and individual state-issued tokens on top, enabling 1-for-1 redeemability across coins. A consortium-style state governance model would warrant a separate design discussion.

Comment (Gaal, Chainlink): Chainlink has been working on geofencing concepts for incentive grants, ensuring a New Hampshire-issued grant token cannot be spent at out-of-state vendors; offered a follow-up.

Q (Kisch): How does on-chain value get converted back to fiat?

A (Baksys): On/off ramping is performed by partners (e.g., Franklin Templeton); LayerZero is exploring related products later this year that surface fiat-to-on-chain flows via APIs while keeping fiat processing with partners.

Q (Ammon): What was Wyoming's thinking on selecting a non-US-domiciled vendor (LayerZero, headquartered in Vancouver) for stable token issuance?

A (Apollo, Wyoming): Wyoming's procurement awarded extra points for Wyoming-domiciled providers, but capable distributed-development talent in this space is global. After multiple RFI/RFQ/RFP rounds with interviews and demonstrations, LayerZero was the clear winner. A non-negotiable requirement was that Wyoming had to be able to ultimately own the technology, including key management (via Fireblocks) and the deployed smart contracts; Wyoming is now the ultimate authority on those contracts.

A (Baksys): Pushed back on the framing of "lock-in": the protocol is decentralized and global with no domicile, and the products and services layer is contracted with no vendor lock-in.

Comment (Oranburg): New Hampshire's DAO statute provides a path for service providers to be domiciled in New Hampshire as a DAO, which could both reinvest locally and reduce the State's liability footprint by giving it clearer recourse – a procurement criterion the Commission should consider.

Comment (Lapak, UNH): Plugged the UNH / NH Secretary of State DAO-registry hackathon on April 18–19 at the UNH Durham campus; offered to share registration information with interested parties.

IV. COMMISSION DISCUSSION & SCHEDULING

The Chair led a discussion on summer scheduling and the path to the Commission's November report deadline.

Decisions

- Confirmed May 4, 2026 meeting at 10:00 AM; Karen Parker Feld to present, with additional speakers as confirmed
- Confirmed May 13, 2026 meeting at 3:00 PM; Vantage Bank (in partnership with Custodia) confirmed in person, with Sean from Vantage flying in
- Dan Nuñez Cohen recommended Lync Network as a candidate presenter (tokenized collateral for securities, spot trading; works with brokers including tZERO; relevant to use of US and state securities on blockchain)
- Karen Parker Sell may submit written materials in lieu of a full presentation if scheduling does not permit; she will confirm with the Chair
- Summer cadence: Commission consensus moved toward fewer presentations and more time for drafting the report; Oranburg unavailable June 8 – ~August 20 in person but available remotely / asynchronously; Kisch flexible; Garod available, especially with remote option
- Report timeline: Chair targets approximately two months for drafting with asynchronous review; final approval is by Commission Members, with departmental designees free to abstain or submit addenda
- Process note: Group e-mail and group chat are limited under New Hampshire Right-to-Know constraints; iteration will rely on documented meetings and scoped tools accordingly

- Bill-filing awareness: House LSR filing windows in September and November; the Chair noted the desire to be positioned in case the Commission recommends legislation, while keeping that workstream independent of the Commission's deliverable

V. NEXT MEETING

Date: Monday, May 4, 2026

Time: 10:00 AM

Location: 1 Granite Place, Concord, NH (in-person with remote option via Microsoft Teams)

Planned Presenters: Karen Parker Feld, with additional speakers TBD

Follow-on Meeting: Wednesday, May 13, 2026 at 3:00 PM – Vantage Bank (with Custodia) and additional speakers as confirmed

ACTION ITEMS

#	Item	Responsible	Status
1	Send presentation slides	Colin Cunningham (Chainlink)	Completed
2	Send presentation slides	Simon Baksys (LayerZero)	Completed
3	Follow up on oracle liability and corporate-structure questions	Colin Cunningham (Chainlink)	Pending
4	Confirm percentage of Chainlink code that is open source	Colin Cunningham (Chainlink)	Pending
5	Schedule banking-applications follow-up call	Mark Gaal (Chainlink) / Jim Kisch	Pending
6	Follow up on geofencing concept for state-issued grant tokens	Mark Gaal (Chainlink)	Pending
7	Follow up with SoFi on rescheduling for a future meeting	Keith Ammon	Pending
8	Confirm Vantage Bank / Custodia logistics for May 13 meeting	Keith Ammon	Completed
9	Reach out to Lync Network to gauge interest in presenting	Keith Ammon / Dan Nuñez Cohen	Pending
10	Decide whether to present live or submit written materials	Karen Parker Feld	Completed (live)
11	Distribute UNH / Secretary of State DAO hackathon registration info (April 18–19)	Jeffrey Lapak	Completed
12	Post slides and follow-up materials to commission portal	Keith Ammon	Completed

#	Item	Responsible	Status
13	Prepare meeting minutes	Keith Ammon	Completed

Meeting Adjourned: Approximately 12:08 PM

Respectfully submitted,[1]
Keith Ammon, Chair

Approved on May 13, 2026

[1]Draft minutes were generated from the official Microsoft Teams meeting recording transcript with the assistance of Anthropic's Claude, then reviewed and edited by the Chair prior to distribution.

NEW HAMPSHIRE STABLE TOKEN STUDY COMMISSION

Date: May 4, 2026
Time: 10:10 AM – 11:58 AM
Location: 1 Granite Place, Concord, NH
In-person with remote participation via Microsoft Teams
Minutes

ATTENDANCE

Commission Members Present

Keith Ammon, Chair (Hillsborough 42)
Tara Reardon (New Hampshire Senate, District 15)
Katie Taylor (Staff Attorney, Bureau of Securities Regulation, Secretary of State's designate)
Michael Moranti (Deputy Commissioner of Banking, Banking Commissioner's designate)
Andy Schwab (Blockchain industry representative, remote)
Jim Kisch (Passumpsic Bank, banking industry representative, remote)

Commission Members Absent

Jim Kofalt, Vice Chair (Speaker Pro Tem, Hillsborough 32)
Sen. Daryl Abbas
Chris McAleer (Carroll County District 2)
Seth Oranburg (Professor of Law, UNH Franklin Pierce School)
Brandon Garod (Senior Assistant Attorney General, AG's designate)
Dan Nuñez Cohen (Head of Policy, Crypto.com)

Other Officials and Members of the Public

Christy Merrill (New Hampshire Bankers Association)
Ryan Hale (New Hampshire Bankers Association)
Sue Elkus (member of the public)
Woody Canaday (member of the public, finance background)
James Karas (NH State Treasury)
Jessica Kallipolites (Hearings Examiner, NH Banking Department)
Jonathan Melanson (Demers Praise Anthony, remote)
Mike Dennehy (lobbyist, Dennehy-Bouley, remote)
Patrick Pastor (Human Rights Foundation, remote)
Emelia Galdieri (Banking Commissioner)

Presenter

Karen Parker Feld (member of the public; 30+ years in financial services and economics; Stanford PhD; former IMF and central-bank economist)

I. OPENING & COMMISSION BUSINESS

Chair Ammon called the meeting to order at approximately 10:10 AM at 1 Granite Place in Concord. Members and guests went around the room and remote participants for brief introductions of their backgrounds and roles.

The Chair reported that Fidelity and SoFi had each been invited for the May 4 meeting and that neither was available; the agenda would proceed as published. Approval of the April 6, 2026 minutes was deferred to the May 13, 2026 meeting along with the May 4 minutes, so that both sets could be acted on together.

II. PRESENTATION: KAREN PARKER FELD – A MEMBER-OF-THE-PUBLIC FRAMEWORK FOR EVALUATING STABLE TOKENS, REAL-WORLD ASSETS, AND PROGRAMMABLE MONEY

Presenter: Karen Parker Feld, member of the public
Duration: Approximately 50 minutes plus 35 minutes of Q&A and Commission discussion

Framing and Background

Parker Feld thanked the Chair and Commission for the transparency of the process, including the public website, agendas, presenter materials, and minutes. She framed her remarks as those of an informed member of the public rather than a blockchain or cryptography specialist, drawing on roughly four decades of financial-industry experience including work at the International Monetary Fund and analysis of multiple financial crises (Latin American debt, 1994 Mexican peso, 1997 Asian, 1998 Russian / LTCM, dot-com, 2008–09 mortgage / GFC, and the 2020 COVID response).
She opened with brief video clips from industry and policy leaders – Jane Fraser (Citi), Larry Fink (BlackRock at WEF Davos), Bo Li (Deputy Managing Director, IMF), Augustín Carstens (General Manager, BIS), and a clip on Larry Ellison (Oracle) on AI surveillance – to ground the observation that what had historically been an evolutionary path in finance is now described, by these figures, as a revolutionary unbundling and rebundling of the payments and asset-issuance stack around a digital, tokenized architecture, with explicit references to programmability, conditionality, and identity.

Core Question: What Problem Are We Trying to Solve?

Borrowing the Einstein framing of "spending 55 minutes on the question," Parker Feld asked the Commission to test the proposed solution set (stable tokens, tokenized real-world assets, programmable money) against the problems most often cited in public debate – repeated crises, asset bubbles, inequality, insider trading, lack of affordability, and inflation – and to weigh anticipated benefits against under-discussed costs (energy and storage cost, fiscal-discipline cost, privacy cost, opt-out cost).

Six Question Areas Walked Through

Parker Feld worked through six terms one at a time, surfacing the questions she believed the Commission and the public should be able to answer:
Blockchain – Where is it; who are the network peers; who can obtain a citizen's purchase records once tokenized assets create a per-individual ledger; who establishes consensus over alterations to records that are nominally immutable (citing Bitcoin Improvement Proposal 361 on quantum-resistant migration as an example of network-level coercion); what criteria will determine which chains New Hampshire public and regulated private entities are allowed to use.
Smart Contract – What makes it "smart" if the underlying conditions or data are wrong and execution is automatic; who beyond the contracting parties sets the predetermined conditions; who evaluates whether they are met; what role does the contract programmer (potentially an AI) play; who holds liability when an algorithm or AI-generated code fails.
Stable Coin – If conditions are set by government and enforced by private issuers (per the Genius Act mandate that issuers be designed to block, freeze, or reject transactions for KYC/AML, sanctions, and "other lawful orders"), how is that materially different from a CBDC; where does the seigniorage from

reserve yield ultimately rest if issuers cannot pay yield to holders; what happens to community banking if deposits are drawn into stable-coin reserves; what is the macro impact on poorer countries with weaker financial systems if dollar stable-coin demand accelerates dollarization.
Programmable Money – Conditionality enables automated compliance but also enables expiration dates, geofencing, and "positive list" spending (citing five-state SNAP junk-food pilots, the EU Carbon Border Adjustment Mechanism, and the UK House of Lords "Absolute Zero" report as directional examples). She drew a sharp distinction between "distributed" (mechanics) and "decentralized" (conditions), arguing that distributed mechanics under centrally-set conditions do not produce decentralized finance, and flagged failure-cascade risk under poorly-specified algorithms or sudden policy changes.
Real-World Assets – Tokenization can expand financial inclusion via fractional ownership and improve liquidity, but not all characteristics of an asset reduce cleanly to digital fields (homes and forests as harder cases than vehicles). She raised the SEC's 2024 "natural assets" concept and used regenerative-agriculture experience to caution that disaggregating systems into tradable parts can damage the system itself; raised the legal question of student-equity tokenization; and flagged the recent CFTC injunction on behalf of a prediction-market platform against the State of Arizona as a federal-vs-state preemption question on which New Hampshire could lead with a clear gambling-vs-investing distinction.
Token – Most investors today already hold contractual claims rather than legal title to their securities (citing David Rogers Webb's "The Great Taking" as a reference), and tokenization of homes or pooled real-estate investments raises the same custody-and-title questions in a more consumer-facing form.

Recommended Posture for the Commission

Parker Feld closed with three asks of the Commission, framed as a "first do no harm" posture: (1) maintain the current open, public, on-record process so a non-specialist can follow the conversation; (2) move deliberately on regulatory choices and document the trade-offs rather than optimize for speed; and (3) preserve a meaningful citizen opt-out, including a digital-ID opt-out modeled on Idaho SB 1299, which prohibits public entities from requiring digital identification or denying services for refusing to use it. She concluded with a clip on Larry Ellison's AI-surveillance comments to underline why the privacy-and-opt-out point matters.

Q&A and Commission Discussion

Q (Schwab): What two or three concrete outcomes from this Commission would you consider a success?
A (Parker Feld): (1) The on-the-record dialogue and public materials are themselves a success and should continue; (2) take the time to document regulatory choices and their cost-benefit rationale rather than rushing on a Wall Street timeline; (3) build in a citizen opt-out, in keeping with New Hampshire's philosophical traditions.
Comment (Schwab): Public, permissionless blockchains emerged in part as a response to existing harms in legacy systems and are valued internationally as a non-violent, low-coercion settlement layer; the goal is to integrate the technology in ways that reduce the need for force-backed enforcement while preserving the opt-out Parker Feld is asking for.
Comment (Ammon): Endorsed Parker Feld's framing on privacy and opt-out and added three technical clarifications: (a) on a public chain, smart-contract code is visible to anyone who can read it, even if not to non-technical users; (b) the quantum-computing risk applies to the entire cryptographic stack underpinning banking, not just Bitcoin; and (c) the Commission's working frame should be "privacy in the private sphere, transparency in the government sphere."
Q (Kisch): Thanked the presenter and asked whether the Commission should invite a future presenter specifically chartered to address the questions Parker Feld raised that did not have ready answers today.
Chair Ammon agreed and took the action.

Comment (Sen. Reardon): Reframed the questions through the lens of the legitimate role of state government – preventing harm, controlling bad actors, providing consumer confidence and safety, and locating the line between privacy and transparency. Suggested the Commission focus its recommendations where state action can in fact reach.
Comment (Canaday / Parker Feld): Stable-coin tokenization may extend the global reach of the U.S. dollar and allow continued federal deficit finance by absorbing demand for U.S. Treasuries, with knock-on effects on smaller economies and a recurring pull on the Federal Reserve as effective backstop.
Comment (Kisch / Ammon): Disintermediation – cutting out gatekeeping middlemen – was added to the list of anticipated benefits to keep alongside the costs Parker Feld surfaced.

III. CHAIR'S PRESENTATION: STABLE TOKEN AND RWA YEAR IN REVIEW

Presenter: Chair Ammon
Duration: Approximately 30 minutes, drawn from the running news feed maintained on the Commission website

Twelve-Month Arc

Stable-coin market capitalization: from approximately $240 billion to approximately $322 billion (~34% YoY).
Tokenized real-world assets: from approximately $8 billion to approximately $31 billion (~209% YoY).
Federal framework: the Genius Act became law on July 18, 2025 – the first federal stable-coin framework, with 100% reserves, three issuer types, holder priority in failure, and a state pathway preserving the dual banking system. Approximately eight months of agency rulemaking remain (notices of proposed rulemaking pending at OCC, Treasury, FDIC, and NCUA, with comment deadlines coming due).
Wyoming's Frontier Stable Token (FRNT) is the first state-issued stable token, with reserves in U.S. dollars and short Treasuries, custody via Franklin Templeton, technology partner Apollo, cross-chain bridging via LayerZero, and yield routed to the Wyoming general fund (notably to public schools).

Last Thirty Days – Federal and Industry Activity

Clarity Act (market-structure bill) reported to be in the "red zone" in the Senate, with industry pushing for a May 11 Senate Banking markup; revised yield-compromise text was released late on the prior Friday and is being vetted (Senator Tillis broke the text; Coinbase reportedly supportive of the revised language).
Yield debate – under Genius, downstream exchanges may pay yield/rewards even though issuers may not; banks are pushing to close that path in Clarity. Outcome is the central open variable for issuers, banks, and would-be state issuers.
Industry: Morgan Stanley stable-coin reserves portfolio; Western Union announced a stable coin to settle global transactions outside SWIFT; Mastercard / Circle partnership; Visa stable-coin settlements at a roughly $7B annualized run rate; Meta paying creators in USDC via Stripe; Tether reported $1.04B Q1 profit.
Networks: most stable-coin value resides on Ethereum, with significant volume also on Tron (where the FBI recently coordinated a freeze of approximately $344M of Tether) and BNB Chain. On-chain stable-coin transfer value reached approximately $33 trillion in calendar year 2025, exceeding combined Visa + Mastercard volume of roughly $27 trillion (with the caveat that a meaningful portion is DeFi and cross-exchange arbitrage rather than retail payments).
Federal rulemaking timeline highlights: NCUA framework (Feb 8); OCC stable-coin issuance guidance for OCC-supervised entities (Mar 2); Genius rule giving wide latitude to states (Apr 1); Treasury actions in early April.

Open federal questions: jurisdictional split between SEC and CFTC over which tokens are securities versus commodities, and a developer "safe harbor" question for open-source contributors who do not custody funds.

State Activity

Wyoming – FRNT in production, governor chairs the issuing Commission, yield to the general fund.
Georgia – stable-coin bill (private-issuer model).
Florida – advancing along similar private-issuer lines.
North Dakota – "Rough Rider" concept connected to its long-standing state-owned bank, with a capital base rooted in resource-extraction history that is not readily replicable in New Hampshire.
Delaware – pursuing its own framework.

Banks, Wall Street, and Tokenized RWAs

Bank pilots: J.P. Morgan, Bank of America, Citibank, HSBC, Société Générale, and others; pilots include the Stellar network and Canton Network (DTCC pilot).
Issuance and infrastructure: Fidelity launched a digital dollar; Anchorage offers an issuance platform; Kraken made an acquisition in tokenized assets.
Wall Street tokenized funds: BlackRock BUIDL, Franklin Templeton BENJI, Circle USDC and USYC, Ondo, J.P. Morgan tokenized assets; AI-agent payments pilot via MoonPay.
RWA composition: approximately 65% U.S. Treasuries, with the balance in private credit, equities/ETFs, commodities, real estate, and other.
Tokenized-Treasury league table: Circle is currently the largest U.S.-headquartered issuer; Tether's exposure does not fully appear in the standard league table due to legacy classification.

Global Posture

Pro-engagement: Japan, South Korea.
Neutral: China.
Recently restrictive: Brazil placed a hold on cross-border crypto payments, evidently to slow dollar absorption of its banking system.

Risks and Open Items to Track

Bank disintermediation – the New Hampshire Bankers Association cited a national-association estimate of up to roughly $1.9 billion in potential deposit outflows from New Hampshire banks under the more permissive yield outcome, with downstream effects on small-business lending and mortgages.
Disclosure and accounting standards.
Dollarization of weaker economies and feedback risk into the Treasury market.
Operational and cyber security, including the recent discussion of AI-driven attack surfaces against legacy money-transfer systems.
Financial stability and yield ambiguity until Clarity is final.

Implications for the Commission

Chair Ammon framed five questions for ongoing Commission deliberation: which model New Hampshire would adopt; where any seigniorage / yield would flow; how RWAs are regulated and consumer protections are scoped; whether interstate compact arrangements are worth pursuing; and which state agency or agencies would supervise (Banking Department, Bureau of Securities Regulation within the Secretary of State's office, or a hybrid). The slide deck used in this segment was posted to the Commission website during the meeting after a brief screen-sharing issue.

IV. COMMISSION DISCUSSION & SCHEDULING

Decisions

May 13, 2026 meeting confirmed at 3:00 PM at 1 Granite Place; planned presenters Vantage Bank in partnership with Custodia (Sean attending in person) and Lync Network (suggested by Dan Nuñez Cohen).
Approval of both the April 6, 2026 and May 4, 2026 minutes deferred to the May 13, 2026 meeting.
Summer cadence: a June meeting may be scheduled if a strong follow-on speaker is identified to address the questions Parker Feld raised; the Commission will not meet in July or August. A meeting in early November is targeted, with Sean from Vantage planning to be present in person.
Chair to identify a future presenter specifically asked to respond to the questions surfaced by Parker Feld's framework (action carried from Q&A).
The Chair confirmed that the running news feed and the year-in-review deck would be available on the Commission website.

V. NEXT MEETING

Date: Wednesday, May 13, 2026
Time: 3:00 PM
Location: 1 Granite Place, Concord, NH (in-person with remote option via Microsoft Teams)
Planned Presenters: Vantage Bank (with Custodia) and Lync Network
Additional Business: Approval of April 6, 2026 and May 4, 2026 meeting minutes

ACTION ITEMS

Chair attempt to identify and invite a follow-on presenter to address the open questions surfaced by Parker Feld (privacy posture, opt-out, conditionality, programmer/AI liability).
Chair to post the year-in-review deck and updated news feed to the Commission website.
Commission Members encouraged to review NPRMs from OCC, Treasury, FDIC, and NCUA and flag comment deadlines relevant to a New Hampshire-issued stable token.
Commission Members to monitor Clarity Act movement (Senate Banking markup target around May 11) for the yield-treatment outcome.
Meeting Adjourned: Approximately 11:58 AM
Respectfully submitted,
Keith Ammon, Chair

Approved on May 13, 2026
s—
Note: These minutes were generated by Claude (Opus 4.7) from the Microsoft Teams meeting transcript, with minor corrections for spelling and context.

NEW HAMPSHIRE STABLE TOKEN STUDY COMMISSION

Date: May 13, 2026

Time: 3:10 PM – 5:08 PM

Location: 1 Granite Place, Concord, NH

In-person with remote participation via Microsoft Teams

Minutes

ATTENDANCE

Commission Members Present

Keith Ammon, Chair (Hillsborough 42)
Michael Moranti (Deputy Commissioner of Banking, Banking Commissioner's designate)
Katie Taylor (Staff Attorney, Bureau of Securities Regulation, Secretary of State's designate)
Jim Kisch (Passumpsic Bank, banking industry representative)
Seth Oranburg (Professor of Law, UNH Franklin Pierce School, remote)
Dan Nuñez Cohen (Head of Policy, Crypto.com, remote)

Commission Members Absent

Jim Kofalt, Vice Chair (Speaker Pro Tem, Hillsborough 32)
Sen. Tara Reardon (New Hampshire Senate, District 15)
Sen. Daryl Abbas
Chris McAleer (Carroll County District 2)
Andy Schwab (Blockchain industry representative)
Brandon Garod (Senior Assistant Attorney General, AG's designate)

Other Officials and Members of the Public

Kristy Merrill (President and CEO, New Hampshire Bankers Association)
Karen Parker Feld (member of the public; proprietor of Prospect Hill Farm)
Woody Canaday (member of the public; Osher instructor on the history of the U.S. dollar and its rivals)
James Karas (NH State Treasury)
Jackson Bouley (Dennehy-Bouley, Concord)
Kyle Baker (Rath Young Pignatelli)
Mike Dennehy (lobbyist, Dennehy-Bouley, remote)
Emelia Galdieri (Banking Commissioner)

Video: youtu.be/jdcAaZYhWHY

Presenters

Jerald David, CEO, Lynq Network (remote, from Bermuda); introduced by Commissioner Dan Nuñez Cohen
Shawn Main, EVP and Chief Business Architect, Vantage Bank; presenting on the Hazel Network (Vantage Bank / Custodia Bank tokenized-deposit platform)

I. OPENING & COMMISSION BUSINESS

Chair Ammon called the meeting to order at approximately 3:10 PM at 1 Granite Place in Concord. Members and guests in the room and on Microsoft Teams introduced themselves and their roles. The Chair confirmed a quorum and posted the agenda link in the meeting chat.

Two sets of minutes were before the Commission for approval. The April 6, 2026 minutes were approved by voice vote, with one revision: Commissioner Galdieri (who attended in person) had been omitted from the attendance list and was added. The May 4, 2026 minutes were approved by voice vote with one revision already incorporated by the Chair before the meeting (correcting the spelling of Sue Elkus's name). There were no opposed votes or abstentions on either motion.

II. PRESENTATION: JERALD DAVID, LYNQ NETWORK – A TOKENIZED, REGISTERED 40 ACT TREASURY FUND AS AN INSTITUTIONAL SETTLEMENT LAYER

Presenter: Jerald David, CEO, Lynq Network (remote)

Duration: Approximately 25 minutes of prepared remarks plus 30 minutes of Q&A

Introduction and Background

Commissioner Nuñez Cohen introduced David and the Lynq Network. Crypto.com has been partnered with Lynq for over a year to enable customers to use tokenized money-market funds as collateral in trading, with 24/7 onchain settlement using a combination of regulated overseas entities, U.S. broker-dealers, and Lynq's technology. The partnership is targeted at institutional clients first, with a longer-term path to retail.

David thanked the Chair and Commission and noted he had reviewed the prior meetings' minutes and presentations. He centered his remarks on the multi-year journey of building what he described as the first 40 Act, registered, tokenized U.S. Treasury fund, and on how that journey produced the institutional settlement network now operating as Lynq.

The Original Thesis (2018–2020): Tokenizing a Registered Treasury Fund

Beginning in 2018 at Arca Capital Management (the SEC-registered RIA where David then served as President), the team formed a thesis that blockchain would be disruptive to traditional finance and that digital-asset securities, then an under-defined term, would be

the driving force. Rather than build a crypto product, the team set out to create a new "wrapper" under the Investment Company Act of 1940 – a new category of pooled vehicle (a "blockchain-transferred fund") that would let an investor take title to and self-custody shares of a traditional fund delivered onchain.

David emphasized that the company embraced regulation rather than running from it: it registered with the SEC voluntarily (before crossing the $500M AUM threshold that would have required registration), and worked iteratively for roughly two years with multiple SEC divisions, including the then-new FinHub, to land an effective registration. The Arca U.S. Treasury Fund went effective on July 6, 2020, with shares delivered on the Ethereum blockchain. Over the following years, the team reduced redemption windows (90 → 60 → 30 days) and explored tokenized-deposit interoperability with Signature Bank's Signet network (later decommissioned).

David noted that much of the prospectus language Arca had to coin in 2018–2020 – with no IP claimed on it – subsequently appeared in governing documents from Franklin Templeton, BlackRock, WisdomTree, and others, which he characterized as validation rather than plagiarism.

Building Lynq: A Broker-Dealer-Operated Real-Time Settlement Network

By 2024, several pressures – the decommissioning of Signature/Silvergate-style tokenized-deposit networks, the demand for yield among large stablecoin holders, the delta between 24/7 crypto markets and banking hours, and concentration risk in bridges back to bank rails – created an opening to take a proven tokenization model out of the banking system and into a broker-dealer-operated settlement layer using shares of a tokenized Treasury fund as the settlement asset. That became Lynq Network.

David walked through the three core regulated components of the Lynq stack: (1) Arca Capital Management as SEC-registered RIA and adviser to a new fund created under a Delaware statutory trust with an independent board of directors, with cash held in segregated, bankruptcy-remote accounts at U.S. Bank; (2) a special-purpose broker-dealer partner, tZERO Securities, that handles onboarding, AML/KYC, accredited investor / QP verification, and the seven-year FINRA-mandated transaction recordkeeping; and (3) technology partner Tassat ("Tacit" in the transcript), whose infrastructure previously ran the Signature Bank tokenized-deposit network and the Customers Bank CBIT network, has cleared over $3 trillion in cumulative transactions, and is SOC 2 Type II certified.

"Yield in Transit" and Use Cases

Lynq introduced what David called "yield in transit": interest on the underlying Treasury fund accrues at the two-second block level and is distributed daily, proportional to actual time the share was held on platform (e.g., 12 hours of holding earns 50% of that day's accrual on the notional). This inverts the traditional month-end interest model and lets market-makers, broker-dealers, and other counterparties settle obligations on Lynq without losing yield.

Video: youtu.be/jdcAaZYhWHY

Use cases currently in deployment or being built out include: cross-border capital movement; exchange liquidity funding; off-exchange collateral (e.g., for FCMs satisfying initial or variation margin over weekends in volatile commodities markets); stable-coin bridging (first license now with Ripple, RLUSD); corporate treasury management; and counterparty / peer-to-peer settlement.

Technology Stack and Privacy Model

Lynq is a full Avalanche shop. After originally issuing the Arca U.S. Treasury Fund shares on Ethereum and finding gas costs prohibitive at velocity, the team migrated. Public, transparent share issuance now occurs on Avalanche's C-Chain. Approximately two months ago, the private, permissioned settlement chain (formerly on Ethereum) was migrated to its own L1 instance on Avalanche, with validators run by Lynq and its technology partner Tassat (unlike Canton and other networks, third-party validators are not offered).

On privacy: counterparty trade information (size, time, counterparty, denomination) is visible only to the two transacting parties and the broker-dealer (which retains records for seven years under FINRA rules). The roughly 50 current users do not see each other's trade data; Lynq is a settlement layer, not a matching venue, and bolts on to venues that do provide price transparency. Redemptions to cash flow from U.S. Bank back to the redeeming party's own bank account; for AML/KYC reasons the broker-dealer cannot wire to a third party.

Closing Asks and Suggested Framing for the Commission

David closed with the view that stablecoins will likely not be able to deliver yield directly to holders under the federal framework now taking shape, and offered three questions for the Commission: (1) what are the specific NH use cases for stable tokens versus tokenized money-market funds; (2) how could yield from a tokenized money-market fund be used as an incentive for out-of-state investment in New Hampshire; and (3) whether the state could partner with an experienced administrator on AML, KYC, and smart-contract governance rather than build alone. He suggested a potential two-tier model: stable tokens for retail use cases and tokenized money-market funds for institutional use cases.

Q&A and Commission Discussion

Q (Kisch): Given Lynq was built through a patchwork of regulatory licenses, what advice would you give a state looking to make licensure smoother?

A (David): "Don't go first – and don't go it alone." Partner with operators that already have deep experience administering stable-token or tokenized money-market fund issuance. He pointed to the Cari Network as an example of a regional-bank consortium (Huntington, M&T, KeyCorp, First Horizon, Old National) pooling resources for tokenized-deposit infrastructure rather than each bank building alone.

Q (member in the room): Could you expand on the "blurring and combining" of public and permissioned blockchains in your design?

Video: youtu.be/jdcAaZYhWHY

A (David): The earlier industry attempt to build a single consortium chain (R3, ≈25 to 125 banks) ran into the inherent reluctance of competitor banks to share order flow on shared infrastructure. Lynq instead issues fund shares on a public chain (Avalanche C-Chain) for transparency and proof-of-reserves visibility, and runs counterparty transactions on a separate permissioned Avalanche L1 to protect institutional positions and proprietary data.

Q (Oranburg): Given the emerging federal split under Clarity, your structure looks well positioned (the stable-token yield prohibition would not reach Lynq because Lynq is a security, not a stablecoin). Were you tracking that, and is there anything about New Hampshire specifically that would make it attractive to domicile a firm like Lynq?

A (David): Lynq is a Delaware LLC; most of the structural decisions predated GENIUS and Clarity but the embrace of registered-product status has aged well. On state attractiveness, David pointed to Wyoming as the clearest example of a state that has converted engagement with this industry into direct investment (citing Kraken's relocation and the Anchorage Digital posture). He observed that the industry "has deep pockets and does what it says it will do" and that early-mover states are well placed to attract operations and tax revenue.

Q (Ammon): Could you describe the technology stack – chain choice, validator set, and individual account-holder privacy?

A (David): Covered above; on individual privacy, the AML/KYC controls and the broker-dealer's custody role enforce account-level privacy by design, and individual redemption flows are constrained to the redeeming party's own bank account.

Q (Ammon): Could you speak to the risk-mitigation angle of the platform?

A (David): Using an oil-and-gas hedger as the example, the ability to send collateral instantly to an FCM over a weekend, when banks are closed but markets continue trading, is itself a risk-management tool; 24/7 onchain settlement compresses the T+2/T+3 exposure window that has historically caused failures when a counterparty defaults or becomes insolvent before settlement.

Q (Ammon): On "double bottom line" / triple bottom line – what benefits to a state's residents (not just the state's tax base) should the Commission be considering?

A (David): Distinguished institutional from retail utility. On the retail side he gave the example of routing state tax refunds via a stable-token rail to compress the wait from mailed-check timelines to near-instant. He also referenced Miami's now-several-years-old positioning attempt as a cautionary mixed case in which tax-rate advantages were probably the larger driver than the blockchain branding.

Closing exchange (Ammon / David): The Chair summarized that Lynq is a security but can move stable-token value (e.g., Tether, the Wyoming Frontier Stable Token) through the platform; David confirmed and noted the platform was built multi-asset, with discussions underway to onboard a second fund from one of the largest U.S. banks.

Video: youtu.be/jdcAaZYhWHY

David noted he was joining from Bermuda and needed to leave to attend a meeting with the Premier; he offered to remain available by email for follow-up questions.

III. PRESENTATION: SHAWN MAIN, VANTAGE BANK – THE HAZEL NETWORK: A BANK-LED TOKENIZED-DEPOSIT AND STABLECOIN INFRASTRUCTURE

Presenter: Shawn Main, EVP and Chief Business Architect, Vantage Bank (in person)

Duration: Approximately 35 minutes of prepared remarks plus 35 minutes of Q&A

Background and Why a $5B Bank Built This

Main brought 25 years in financial services and 18 years at Vantage Bank, where he leads shared services and emerging lines of business. Vantage is a 100% family-owned institution with roughly $5 billion in assets and a customer base of which roughly 30% is foreign-national and heavily cross-border, which the bank treated as both an organizational and an industry-wide risk vector when stablecoin growth began absorbing the underlying payments business. Vantage attempted to acquire a digital-asset custody provider in 2021 in an unfavorable political environment, then pivoted to building capabilities internally and engaging regulators on a biweekly cadence since 2024. The stated objective: bring banks along on the technology in lockstep with the regulators rather than build outside the perimeter.

Why Now – Volume and Deposit-Erosion Risk

Main framed the volume picture: on-chain stablecoin volume currently runs roughly $8.9 trillion in cumulative measured activity, of which approximately $7.6 trillion is inter-exchange and algorithmic flow and roughly $1.3 trillion is more plausibly real-world use; of that, approximately $50 billion / month is B2B and roughly $6–7 billion is retail. Stablecoin rails currently process on the order of 10x the daily volume of U.S. real-time payment systems (RTP ≈ $4B/day vs. stablecoin networks ≈ $30–40B/day).

Stablecoin market size sits around $275 billion on average (recent peak ≈ $320 billion), growing at a 54% CAGR. Approximately 1.4% of community-bank deposits have already left the community-bank system into stablecoin / GSIB pathways. The U.S. Treasury's own study cited by Main puts the long-run potential for deposit erosion at ≈ $6.6 trillion if the trend holds.

Applied to New Hampshire, a 10% commercial-deposit erosion scenario translates to roughly $5 billion of deposit migration, which Main mapped to: $160M–$430M of reduced bank lending capacity (worst-case 1.6x multiplier with no recycling; better-case 2.6x with stable-coin recycling but ≈99¢/$ retained credit loss); 1,700–2,800 jobs at risk; $100M–$160M in wages; and roughly $13M–$20M in tax revenue. Main cited the CSBS finding that core-deposit growth is now the #2 risk for banks (behind net-interest-margin compression).

Video: youtu.be/jdcAaZYhWHY

"Same Products, Different Names" – The Shadow Banking Parallel

Main argued that DeFi has re-created traditional bank products under different names (staking ≈ deposits with rewards; DeFi lending ≈ loans; flash loans ≈ uncollateralized arbitrage borrowing). The benefits driving usage – speed, availability, cost reduction, transparency, atomic settlement, programmability, frictionless asset transition between cash and securities, and onchain credit overlays – are real, but the regulatory gaps must be closed rather than allowed to widen.

He offered three near-term illustrative use cases enabled by tokenized deposits + smart contracts: (a) cross-border manufacturer / supplier early-payment discounting that today fails on T+2 to T+6 settlement; (b) automated multi-institution cash concentration that today is blocked by single-day batch ACH/wire limits; and (c) atomic execution and fractionalization of a $1B bond issuance without an intermediating settlement agent. He argued agentic payments are not realistically achievable without onchain auditability.

The Hazel Network: Bank-Led, Bank-Operated Tokenized-Deposit + Stablecoin Rail

Hazel is the network Vantage and Custodia Bank built. The design principles Main emphasized: accretive by design (even a small share of wire conversions improves bank margin while lowering customer cost and keeping deposits on bank balance sheets); easy integration into existing bank cores; regulatory compliance baked into the smart contract (AML, KYC, travel rule, sanctions – the tokens do not move if checks fail); interoperability across participating banks without forcing on/off-ramping; and patent-protected core technology shared with member banks.

Architecture: each participating bank holds the tokenized-deposit liability on its own balance sheet; Hazel's ledgering and orchestration layer minted/burns tokens 1:1 against the underlying deposit; bank-to-bank transfers move both the token and the cash leg atomically, eliminating counterparty risk. When a token leaves the in-network bank perimeter, the cash reserve is automatically transferred to Custodia, which becomes the 1:1 backing for the same token now functioning as a stablecoin. The token does not change – only the backing entity does. Main called this preserving the "singleness of money."

Main showed a live in-bank-console demo: a $3.71 ("typical size") transfer between two simulated banks ("Vantage Vista" and "Xerio") executed through normal bank operator screens, with AML / wallet screening running in the background, and the resulting on-chain transactions visible on a Polygon testnet explorer; live mainnet contracts are also deployed.

On the bank-to-stablecoin handoff, Main noted that today approximately 88% of stablecoins that leave the banking system never return – "a one-way door" – which is why the in-network single-token model is designed to close the loop and let deposits return home, while still allowing stable-token usage for cross-border and non-bank flows where it adds real value.

Video: youtu.be/jdcAaZYhWHY

Why Tokenized Deposits Beat Stablecoins for In-System Use

Main framed tokenized deposits as "stablecoin plus": same programmability and speed benefits, but on the trust and capital base of the U.S. banking system, FDIC insured, paying interest, and already governed by the existing regulatory framework. The FDIC has stated that a deposit is a deposit – no new framework is required to operate tokenized deposits.

State Policy Recommendations

Main argued that NH gains in five ways from backing its banks into this model and guiding the policy framework: deposits retained in state; expanded credit lending (retaining roughly $0.99 of every $1 of multiplier vs. ~$0.31 in some published stablecoin-only models); mortgage capacity preserved (the $160M–$430M figure above); jobs and wages retained; and tax base preserved. He added that even a 10-minute-per-day productivity improvement for 30% of bank-related employees would translate to approximately 216,000 redirected hours per year (≈ $6M of wage value redirected to growth).

Specific policy asks for the Commission:

> Preserve open access to public blockchains as a public utility, consistent with Executive Order 14178; banks do privacy better than the shadow system but innovation happens on open rails.
> Fast-track licensing: 30-day completeness review, 120-day licensing decisions, with the deadline pressure on the regulator rather than the applicant.
> Statutorily define tokenized deposit, crypto, and blockchain so state departments can move quickly with regulatory clarity.
> Privacy frameworks: support emerging Ethereum protocol-level privacy standards baked in at the protocol layer rather than bolted on.
> Avoid layering unnecessary intermediaries; each additional break point adds risk and cost.

Q&A and Commission Discussion

Q: The $8.9T stablecoin volume figure includes both GENIUS-compliant and non-compliant tokens – will we eventually get visibility into the split, especially between tokenized deposits and non-compliant stablecoins?

A (Main): Yes; greater bank participation in interoperable networks like Hazel is the transparency unlock, both for the industry and for regulators.

Q: Has Texas (Vantage's home regulator) signaled flexibility on capital or liquidity treatment to accommodate participation in a single-token network?

A (Main): Vantage is fully transparent with its regulators. The current Hazel design uses a correspondent-bank model, which surfaces Reg F exposure and similar concentration questions; structures such as joint master accounts (only one currently in existence) could relieve some of those constraints. Tokenized-deposit balances will initially not be treated as

Video: youtu.be/jdcAaZYhWHY

core deposits, with treatment evolving as the network demonstrates stability of velocity over time.

Q: Will banks tokenize all deposits or run parallel accounts?

A (Main): Both, indefinitely – traditional DDAs and tokenized-deposit accounts in parallel – with customers free to migrate as they recognize the programmability benefits.

Q (member in the room, referencing concerns Karen Parker Feld raised at the May 4 meeting): What are your safeguards for smart-contract integrity – SDLC controls, audits, security review, version management?

A (Main): A single audited smart contract handles all functions (mint, burn, freeze, quarantine) across both tokenized deposit and stablecoin form, deployed on Ethereum L1. Contracts live on forever, so deploy-time scrutiny must be higher than for ordinary software; the system also requires bank-grade ratings and onboarding criteria for network participants.

Q (Kisch / Banking Department): What happens to the Banking Department's self-funded examination model if deposits flee and fewer banks remain?

A (NH Banking Department): Deposit-flight risk is hard to calibrate at this point; the department is cautious about putting a number on it and unsure whether NH would diverge from national patterns. The bank count under NH jurisdiction has already been trending down for other reasons; the department's view is that some bank presence will persist, but the funding-model question is real and unresolved.

Q: "Why is this called atomic?"

A (Main, with Ammon): Database term – in an atomic transaction, all dependent steps either commit together or do not commit at all, which on an immutable chain means a swap or transfer is either fully complete or fully reverted, eliminating partial-failure settlement risk.

Q (Ammon): On systemic risk – if many banks share a single tokenized-deposit ecosystem, does that introduce a contagion vector if one participant fails?

A (Main): The argument resembles the "everyone is in Fed" argument; the larger the network the smaller the marginal contagion, but the risk is real and must be monitored empirically, including with onboarding standards for participating banks. Hazel is currently in pilot.

IV. COMMISSION DISCUSSION & SCHEDULING

Decisions

April 6, 2026 minutes approved (with Commissioner Galdieri added to the attendance list under Other Officials and Members of the Public).

May 4, 2026 minutes approved (with the prior spelling correction for Sue Elkus already incorporated by the Chair).
Summer cadence: one June meeting if confirmed speakers (Tether and The Network Firm – the proof-of-reserves provider for Wyoming's Frontier Stable Token – are the targets); no meetings in July or August; one to two September meetings – the first to wrap remaining presentations, the second to begin Commission drafting of the final report.
SoFi rescheduled to a September presentation slot.
Final report target: November 1, 2026, transmitted to the Governor, Speaker of the House, Senate President, State Librarian, and the standard distribution list. Working drafts will likely be posted to the Commission website for public review as they develop.
Chair reported the NH Business Finance Authority (Executive Director James Key-Wallace) is preparing what would be the first state-level conduit bond collateralized by Bitcoin, with collateral from CleanSpark (a Bitcoin miner using only clean energy); approximately $100 million; BFA currently in a quiet period; transaction will require Executive Council and Governor approval. As currently contemplated the BFA would retain half of any profits in cash and half in Bitcoin, with the retained Bitcoin then available to make Bitcoin-denominated loans to NH businesses.
Brief reference to NH SB 639 (quantum-related definitional language) potentially going to committee of conference, with the Chair expecting eventual gubernatorial signature; the bill is relevant to the cryptographic-stack-risk discussion raised at the May 4 meeting.
Mike Dennehy (remote) flagged a structural conflict surfaced by the day's two presentations: a state-issued stable token would on the issuer side want maximum stablecoin adoption to generate state revenue, while the bank-led tokenized-deposit thesis (Vantage / Hazel) wants the opposite – to slow the migration of community-bank deposits into non-bank stable tokens. The Commission will need to weigh this tension in its recommendations.

V. NEXT MEETING

Date: To be confirmed in June 2026 (subject to speaker availability; otherwise September)

Time: TBD

Location: 1 Granite Place, Concord, NH (in-person with remote option via Microsoft Teams)

Planned Presenters: Tether and The Network Firm (Wyoming Frontier Stable Token proof-of-reserves provider) – both targets

Additional Business: Approval of May 13, 2026 meeting minutes

Video: youtu.be/jdcAaZYhWHY

ACTION ITEMS

Chair to confirm or release the June meeting date based on Tether and The Network Firm responses within the next several days.
Chair to confirm SoFi for a September presentation.
Commission members to begin assembling input for the report-drafting work scheduled to start in September; final report due to Governor and legislative leadership on November 1, 2026.
Chair to post the Lynq and Vantage / Hazel presentation materials and the meeting video to the Commission website.
Commission to track the BFA / CleanSpark Bitcoin-collateralized conduit bond as it moves to the Executive Council and Governor.

Meeting Adjourned: Approximately 5:08 PM

Respectfully submitted,

Keith Ammon, Chair

Approved on October 15, 2026

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Note: These minutes were generated by Claude (Opus 4.7) from the Microsoft Teams meeting transcript, with minor corrections for spelling and context.

NEW HAMPSHIRE STABLE TOKEN STUDY COMMISSION

Date: August 19, 2026

Time: 3:00 PM – approximately 5:15 PM ET

Location: NH Banking Department Offices, 53 Regional Drive, Suite 200, Concord, NH 03301

In-person with remote participation via Microsoft Teams

Minutes

ATTENDANCE

Note: No recording or transcript was retained for this meeting (see closing note below).

Commission Members Present

Keith Ammon, Chair (Hillsborough 42)
Katie Taylor (Staff Attorney, Bureau of Securities Regulation, Secretary of State's designate)
Jim Kisch (Passumpsic Bank, banking industry representative)
Seth Oranburg (Professor of Law, UNH Franklin Pierce School) – led Commission discussion on CLARITY Act progress
Dan Nuñez Cohen (Head of Policy, Crypto.com)
Andy Schwab (Blockchain industry representative)

Commission Members Absent

Sen. Daryl Abbas
Jim Kofalt, Vice Chair (Speaker Pro Tem, Hillsborough 32)
Michael Moranti (Deputy Commissioner of Banking, Banking Commissioner's designate)
Sen. Tara Reardon (New Hampshire Senate, District 15)
Chris McAleer (Carroll County District 2)
Brandon Garod (Senior Assistant Attorney General, AG's designate)

Other Officials and Members of the Public

Emelia Galdieri (Banking Commissioner)
Woody Canaday (member of the public; Osher instructor on the history of the U.S. dollar and its rivals)

Presenters

Joe Bognanno, Head of Americas, Policy and Regulatory Affairs, Elliptic
Peter Phelan, Strategic Advisory, Elliptic
Ashley Scott, Senior Director, Global Policy, Circle

I. CALL TO ORDER & OPENING REMARKS

Chair Ammon called the meeting to order at approximately 3:00 PM at the New Hampshire Banking Department offices, 53 Regional Drive, Concord, with members and guests participating in person and via Microsoft Teams.

The meeting agenda was approved.

The May 13, 2026 minutes were presented for approval. The Commission deferred action on this item to the next meeting.

II. COMMISSION DISCUSSION: CLARITY ACT UPDATE

This item, listed on the printed agenda under Commission Discussion & Strategic Planning, was taken up at the start of the substantive meeting rather than in its printed order, ahead of the scheduled presentations.

Presenter: Prof. Seth Oranburg, UNH Franklin Pierce School of Law

Duration: Approximately 10 minutes

Prof. Oranburg updated the Commission on the status of the federal Digital Asset Market CLARITY Act (H.R. 3633), including that a U.S. Senate floor vote was scheduled for September 15, 2026. Drawing on a section-by-section concordance linked in the meeting agenda, he noted that the Senate Banking Committee's substitute, reported June 1, 2026, carries only 9 of the House-passed bill's 66 sections through largely intact, reworks 22, moves 19 – mostly CFTC-related provisions – to the companion Senate Agriculture bill (S. 3755), and drops 16 outright, including the entire Anti-CBDC Surveillance State Act title. He also noted that the Senate substitute replaces the House bill's decentralization-based "mature blockchain system" test with an "ancillary asset" test grounded in the Howey efforts-of-others standard, and that it omits the House bill's ethics rule of construction, which he identified as a key sticking point holding up floor action. A verbatim record of this discussion is not available in the absence of a meeting recording or transcript (see closing note).

III. PRESENTATION: ELLIPTIC – DIGITAL ASSET COMPLIANCE OVERVIEW

Presenters: Joe Bognanno, Head of Americas, Policy and Regulatory Affairs, Elliptic; and Peter Phelan, Strategic Advisory, Elliptic

Duration: Approximately 45 minutes of prepared remarks plus Q&A

Digital Asset Fundamentals

Bognanno and Phelan opened with an overview of digital asset fundamentals: how wallet addresses, public/private key pairs, and blockchain transaction records compare to physical cash. They noted that while no personally identifiable information is stored on-

chain, every transaction is permanently recorded on a public ledger – sender and recipient wallet addresses, amount, timestamp, and a unique transaction hash – creating a full, traceable history back to origin. They characterized digital assets as behaving like "digital cash": the same money-laundering, sanctions-evasion, and fraud principles apply, but at greater speed, scale, and without geographic boundaries, while offering greater traceability than physical cash.

Regulatory Landscape

The presenters traced the regulatory landscape from a pre-2018 "regulatory vacuum," in which only a handful of jurisdictions had digital asset rules and exchanges often operated without mandatory KYC/AML, to a maturing 2025-and-beyond global framework in which most major financial centers now regulate virtual asset service providers, AML/CFT expectations are largely aligned with FATF Recommendation 15 (the Travel Rule), and spot Bitcoin and Ether ETFs have been approved. They walked through key milestones from 2017 (Wyoming's digital asset bank charters) through 2025 (the GENIUS Act, the first federal U.S. stablecoin framework), and cited FinCEN and Abu Dhabi Global Market guidance stating that regulators increasingly expect blockchain transaction monitoring as a core, expected component of an AML program rather than an optional tool.

Industry Trends & Adoption

Bognanno and Phelan presented adoption data showing that a substantial majority of financial institutions are already engaged in digital asset initiatives, with compliance and regulatory complexity cited as the top challenge and a lack of in-house expertise cited as the top barrier. They described eight areas where leading banks are active: VASP onboarding and due diligence; client money accounts for digital asset businesses; blockchain-based payments and settlement (citing JPMorgan Kinexys, Fnality, and Partior); stablecoins and deposit tokens for wholesale use; digital custody infrastructure (citing BNY Mellon, State Street, and Zodia as specialist-custodian partners); trading and market access via ETFs and structured products; tokenization of real-world assets such as bonds, money market funds, real estate, and equities (citing Goldman Sachs DAP, the UBS Tokenized Money Market Fund, and DTCC pilots); and compliance, identity, and interoperability initiatives such as the Regulated Liability Network and SWIFT's digital asset trials.

Combating Illicit Use

The presenters described an increasingly complex illicit-finance threat landscape spanning state-sponsored activity (including DPRK/Lazarus Group crypto theft), sanctions and mixer risk (including OFAC's sanctioning of Tornado Cash and Blender, and actors migrating to alternative obfuscation tools), fraud and scams (including elder fraud and multi-billion-dollar "pig butchering" romance scams), ransomware-as-a-service, emerging risks in NFTs and the metaverse, and elevated regulatory and Travel Rule compliance concerns. They explained that blockchain analytics works by combining public ledger data with off-chain intelligence – sanctions lists, law enforcement data, and dark web information – to cluster wallet addresses by owner, assign risk scores, and trace funds across chains as they move between assets.

Q&A and Commission Discussion

Commission members asked questions following the presentation. A verbatim record of this discussion is not available in the absence of a meeting recording or transcript (see closing note).

IV. PRESENTATION: CIRCLE – STATE-FEDERAL STABLECOIN ALIGNMENT UNDER THE GENIUS ACT

Presenter: Ashley Scott, Senior Director, Global Policy, Circle

Duration: Approximately 45 minutes of prepared remarks plus Q&A

About Circle and USDC

Scott introduced Circle as the issuer of USDC and EURC, founded in 2013, headquartered in New York, and publicly traded on the New York Stock Exchange (CRCL). She described USDC as the world's largest regulated stablecoin, with more than $73 billion in circulation, more than $96 trillion in lifetime on-chain transaction volume, support across 185+ countries and 24 blockchains, and reserves that are 100% backed by cash and cash-equivalent assets, disclosed monthly and assured by a Big Four accounting firm. She outlined Circle's licenses across major jurisdictions, including money transmitter licenses in 46 states, the District of Columbia, and Puerto Rico, a New York BitLicense, MiCA compliance and an Electronic Money Institution license in the European Union, an FCA Electronic Money Institution license in the United Kingdom, and authorizations in Singapore, the United Arab Emirates, Bermuda, Canada, and Japan.

The GENIUS Act Framework

Scott described the GENIUS Act as the first federal U.S. stablecoin law, creating a national "payment stablecoin" category for digital assets designed for payment or settlement whose issuer is obligated to redeem at a fixed amount, and clarifying that payment stablecoins are not securities or commodities. Both banks and nonbanks may issue payment stablecoins through a standalone, firewalled issuing entity, with enhanced federal supervision (by the Federal Reserve, OCC, FDIC, or NCUA) required for "at-scale" issuers above $10 billion in circulation, while smaller issuers may remain under state regulation. Core requirements include 1:1 reserves in cash and high-quality liquid assets, a prohibition on issuers paying yield or interest, a ban on rehypothecating or commingling reserve assets, monthly public reserve disclosures, annual independent audits (PCAOB-standard above $50 billion), bankruptcy remoteness and first-priority claims for token holders on reserve assets, and AML/CFT obligations including the technical ability to block, freeze, or seize stablecoins on legal order.

Federal-State Roles

Scott explained that under the Act, state regulatory regimes must be certified by the Treasury Department, the Federal Reserve, and the FDIC as "substantially similar" to the federal standard before a state may supervise "state qualified" issuers with less than $10

billion in circulation; issuers that grow beyond that threshold generally transition to federal oversight unless they obtain a waiver to remain under state primary supervision. States retain authority to license and supervise state-qualified issuers, to enforce additive consumer protection laws (fraud, disclosures, redemption practices), and to pursue civil and consumer-protection penalties against unauthorized issuers, but federal law preempts separate state chartering or licensing requirements for federally qualified issuers. Foreign issuers may only access U.S. markets through federal (OCC) registration and are not eligible to register under a state regime.

Why States Matter

Scott argued that certified state frameworks give banks and fintechs a clear path to operate under state oversight while they scale, that early state leadership can help shape national and global stablecoin policy, and that strong state-level regimes build consumer trust and strengthen U.S. financial competitiveness.

Q&A and Commission Discussion

Commission members asked questions following the presentation. A verbatim record of this discussion is not available in the absence of a meeting recording or transcript (see closing note).

V. PUBLIC COMMENT PERIOD

The Chair opened the floor for public comment. A record of specific public comments offered, if any, is not available in the absence of a meeting recording or transcript (see closing note).

VI. COMMISSION DISCUSSION & NEXT STEPS

The Chair noted that the next Commission meeting is scheduled for September 17, 2026.

ACTION ITEMS

Chair to post the Elliptic and Circle presentation materials and, if available, any meeting materials to the Commission website.
Chair to finalize the agenda for the September 17, 2026 meeting.

VII. ADJOURNMENT

Meeting Adjourned: Approximately 5:15 PM (the meeting ran approximately 15 minutes past the scheduled 5:00 PM end time)

Respectfully submitted,

Keith Ammon, Chair

Approved on October 15, 2026

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Note: These minutes were reconstructed by Claude from the meeting agenda, the Elliptic and Circle presentation materials linked to the agenda, and information provided by Chair Ammon. Microsoft Teams indicated that it began recording and transcribing this meeting approximately five minutes after it started, but due to a technical difficulty neither the recording nor the transcript was retained: both are absent from the meeting's Recap, and the organizer's OneDrive Recordings folder is empty. NH General Court IT was asked to check the Teams admin center, SharePoint/OneDrive retention, and the compliance recycle bin for a recoverable copy. The Commission approved these minutes on October 15, 2026.

NEW HAMPSHIRE STABLE TOKEN STUDY COMMISSION

Date: September 17, 2026

Time: 10:02 AM – 12:29 PM

Location: NH Banking Department Offices, 53 Regional Drive, Suite 200, Concord, NH 03301

In-person with remote participation via Microsoft Teams

Minutes

ATTENDANCE

Commission Members Present

Keith Ammon, Chair (Hillsborough 42)
Jim Kofalt, Vice Chair (Speaker Pro Tem, Hillsborough 32, remote)
Jim Kisch (Passumpsic Bank, banking industry representative)
Andy Schwab (Blockchain industry representative, remote); also presented

Commission Members Absent

Sen. Tara Reardon (New Hampshire Senate, District 15)
Sen. Daryl Abbas
Chris McAleer (Carroll County District 2)
Michael Moranti (Deputy Commissioner of Banking, Banking Commissioner's designate)
Brandon Garod (Senior Assistant Attorney General, AG's designate)
Katie Taylor (Staff Attorney, Bureau of Securities Regulation, Secretary of State's designate)
Seth Oranburg (Professor of Law, UNH Franklin Pierce School)
Dan Nuñez Cohen (Head of Policy, Crypto.com)

Other Officials and Members of the Public

Emelia Galdieri (Banking Commissioner)
Seth [surname unclear in transcript] (General Counsel; name and affiliation to be confirmed by the Chair)
Kristy Merrill (President and CEO, New Hampshire Bankers Association; board member, BankChain Alliance); also presented
Ryan Hale (Vice President of Government Relations, New Hampshire Bankers Association)
Kyle Baker (Rath Young Pignatelli; board member, New Hampshire Blockchain Council)
Woody Canaday (member of the public; Osher instructor)

Karen Parker Feld (member of the public)
Richard Gibson (member of the public; NH resident working in agentic finance, remote)
Mark Gaal (Chainlink, remote)
Josh Siegel (Fiserv; founder and CEO of StoneCastle, remote)

Presenters

Andy Schwab, Commission member (remote): live demonstration of a Web3 wallet, DeFi, and agentic commerce
Rowland Graus, Product Leader, Agentic Economy and Payments, Chainlink Labs (remote)
Joe Healey, Head of Digital Assets, Fiserv (remote); introduced by Commissioner Jim Kisch
Kristy Merrill (New Hampshire Bankers Association) and Jim Kisch, Commission member (in person): BankChain Alliance

I. OPENING & COMMISSION BUSINESS

Chair Ammon called the meeting to order at approximately 10:02 AM at the New Hampshire Banking Department offices, 53 Regional Drive, Concord. The Chair posted the agenda link in the meeting chat. Commissioner Galdieri noted that the room's conference camera was recording but not rotating, so remote participants could see only the Chair. Members and guests in the room and on Microsoft Teams introduced themselves and their roles.

Quorum check: two Commission members were present in the room (Ammon, Kisch) and two online (Kofalt, Schwab). The Chair stated that this did not constitute a quorum, and no votes were taken. Approval of the May 13, 2026 minutes was therefore carried over to the next meeting.

The Chair also stated his intent to hold the August 19, 2026 minutes for a later meeting regardless. Microsoft Teams did not retain a recording of that meeting (presentations by Elliptic and Circle), and the Chair reconstructed the draft minutes from the two organizations' slide decks and from Professor Oranburg's comparison of the House and Senate versions of the CLARITY Act. One further attempt to locate the recording remains.

No changes to the agenda were requested. The Chair noted the meeting would likely run about 30 minutes past its scheduled length.

II. PRESENTATION: ANDY SCHWAB, COMMISSION MEMBER – LIVE DEMONSTRATION OF A NON-CUSTODIAL WALLET, DEFI, AND AGENTIC COMMERCE

Presenter: Andy Schwab, Commission member (remote)

Duration: Approximately 23 minutes of demonstration plus 16 minutes of Q&A

Introduction and Purpose

The Chair explained that after a year of presentations about Web3 and blockchain, a hands-on demonstration would show the Commission what using the technology actually looks like. Schwab described nearly 30 years as a technologist and nearly seven in crypto, focused largely on securing blockchain communities, along with participation in decentralized autonomous organizations, running his own blockchain infrastructure, and service on the prior New Hampshire Commission on Cryptocurrencies and Digital Assets. He noted that he is not a financial or regulatory expert. His stated goal was to show the technology behind stablecoins, which he called elegant and accessible, and to close with observations for regulators.

Non-Custodial Wallet and Public, Permissionless Transactions

Using MetaMask, a non-custodial wallet (the operator holds the keys and needs no one's permission to transact), Schwab opened a brand-new, empty wallet on Base, an Ethereum-based layer 2 network. He funded it with 0.02 ETH (about $48) from another wallet and showed the transfer on a public blockchain scanner within seconds. He emphasized two properties: public (anyone can read the permanent record) and permissionless (the network runs code and does not care who the user is or where they are from).

He then swapped a portion of the ETH for USDC through Aerodrome, an automated market maker, and showed the USDC token contract on the scanner: roughly $4.2 billion of USDC on that chain held across about 11 million wallets, all publicly visible.

DeFi Lending, Borrowing, and Market Making

On Aave, one of the largest DeFi lending applications, Schwab approved the smart contract's use of his USDC, supplied 10 USDC to the lending pool, and received a yield-bearing receipt token. He then borrowed 4 EURC (a euro-pegged stable token) against that collateral. Within a few minutes the new wallet had been funded, had converted to a stable token, was earning yield, and had borrowed against its deposit.

Using DeFi Llama, he showed approximately $87 billion of total value locked across DeFi, a little more than $5 billion of it on Base, and noted that Aerodrome had generated about $600,000 in fees in the prior 24 hours. He then deposited his borrowed EURC alongside USDC into an Aerodrome liquidity pool (quoted at roughly 8% for a narrow, higher-risk range), becoming a market maker and earning a share of trading fees. His point: financial tools historically available to a small number of powerful institutions are open to anyone on a public permissionless chain. He cautioned that automated market makers have grown considerably more complex and that he does not recommend using them without real expertise.

How Circle Enforces Compliance On-Chain

Schwab opened the USDC smart contract and ran its isBlacklisted function against his own wallet (result: not blacklisted). He then displayed the blacklister address and its recent on-

Video: youtu.be/uVqpWyuJ8fo

chain blacklisting actions. He described this as a powerful issuer-level control, and noted that because the ledger records how value moves across the whole graph of addresses, blockchains enable strong forensic capabilities for managing financial risk.

Agentic Commerce: An AI Agent Paying in USDC

Schwab described two paths for machine-to-machine payments: card-style rails (familiar, but with higher fees and more complex settlement and management) and stablecoin rails (sub-cent fees, near-immediate finality, less complexity). Anything he had done manually in the demo can be done programmatically by an AI agent.

He had built a web page that requires a stablecoin payment of one tenth of a cent before a bot may read it. His local agent requested the page, received the payment instruction, paid 0.001 USDC to the demo wallet, confirmed settlement, and returned the page's content. The payment appeared on the public scanner. He noted the network transaction fee was slightly more than the payment itself, so a real price would need to be somewhat higher, but the costs are sub-cent and settle in seconds.

Observations for Regulators

The demo generated roughly two dozen on-chain transactions. Schwab observed that each is a taxable event and a potential OFAC or FinCEN compliance exposure, and leaves a consumer vulnerable to rapidly changing regulatory interpretation. He offered an analogy: if early motorists had been required to treat each gasoline detonation in the engine as a commodities transaction, only the largest institutions could have carried the compliance burden, and the innovation would have been de facto illegal for the general public.

For several years he did roughly half his banking on-chain, producing about 13,000 transactions. As regulation and guidance fluctuated, the burden became unmanageable, and he no longer uses DeFi, although he still regards it as a powerful and liberating set of capabilities. He said that using DeFi powered by stablecoins was the first time he felt in control of his financial resources, in contrast with multi-day processing, paper signatures, banker's hours, and rising fees. He closed by saying the decisions made in commissions like this one will shape how the next generation experiences finance.

Q&A and Commission Discussion

Q (Ammon): Explain the separation between the websites shown (Aerodrome, Aave) and the blockchain itself.

A (Schwab): Aerodrome and Aave are not a bank or a lender in the traditional sense. They are front ends: software that reads the single global public blockchain, displays the relevant smart contracts, and tells the wallet how to interact with them. If the websites disappeared, the smart contracts would still exist and could be called by running a node or directly through a block scanner. In reply to a follow-up, he confirmed that anyone could rebuild such a front end independently, and that he has done so with open-source software. He called it the opposite of the SaaS model, in which a provider holds and manages the user's data.

Video: youtu.be/uVqpWyuJ8fo

Q (Hale): Are the wallets on Circle's blacklist identified through blockchain analytics, or by other mechanisms?

A (Schwab): Analytics firms such as Chainalysis and TRM Labs specialize in this, and governments are increasingly building the capability themselves. Because the data is public, they can identify high-risk transactions, sanctioned addresses, and value flows, and then direct the issuer on what to blacklist. Technically, it is no more complex than a function call on the contract.

Comment (Ammon): The tenth-of-a-cent payment is comparable to a newspaper paywall replaced by a per-article micropayment, and the same model could apply to any data or function call.

Q (Canaday): When you borrowed EURC, was that against USDC that was already lent out and earning yield? If so, that is rehypothecation and builds leverage.

A (Schwab): Supplied USDC is fungible and goes into a pool (at that moment earning 3.74% and lent at 4.72%); the supplier may borrow against that collateral up to a limit. Nearly all surviving DeFi lending is fully collateralized. Aave displays a "health factor," and the smart contracts automatically liquidate collateral if its value falls below a threshold. A user could loop deposits and borrowing to lever up, which he did not do. Excessive rehypothecation is what blew up in the original DeFi boom, and many current protections were built in response. He cautioned that the protocols have become much more sophisticated since he studied them closely.

Comment (Canaday): His concern runs from individual risk to systemic risk, if many participants are levered at once and unwinds do not function.

A (Schwab): Systemic contagion is an active topic in these communities. He briefly showed Morpho, a lending platform that gives lenders substantially more control over the risks they accept, and said Coinbase's lending and borrowing product uses Morpho on the back end.

Comment (Ammon): Aave, as used in the demo, is not an institution handling funds; it is a set of smart contracts living on a decentralized blockchain, which makes it very difficult to shut down. Base is a layer 2 network released by Coinbase on Ethereum. Schwab agreed, adding that every transaction shown was a transaction against the public blockchain, defined by code and adjudicated by many thousands of nodes, not a transaction with Aave the front end or Morpho the company.

Q (Parker Feld): "Public" could mean open to anyone or visible to everyone. Which is meant? And is visibility a necessary feature, given the loss of privacy?

A (Schwab): Both. Public means anyone can read the entire ledger at any time, which is what makes collusion extremely difficult and expensive. Permissionless means the only requirement to transact is gas, the token used to pay the network to run code. On privacy, he distinguished base networks, which need to be public, from what can be built on top of

them. Zero-knowledge technology allows mathematical certainty that something is true without revealing the underlying secret data, including in ways that can remain regulation-compliant, and is a current focus of Ethereum's core developers.

The Chair thanked Schwab and noted his contact information is on the Commission portal.

III. PRESENTATION: ROWLAND GRAUS, CHAINLINK LABS – THE AGENTIC ECONOMY AND PAYMENTS

Presenter: Rowland Graus, Product Leader, Chainlink Labs (remote)

Duration: Approximately 15 minutes of prepared remarks plus 7 minutes of Q&A

Introduction and Background

The Chair introduced Graus as a product leader at Chainlink Labs focused on the Chainlink Runtime Environment (CRE) orchestration engine, AI agents, and compliance products. He leads Chainlink's agents product, currently in beta, and the Automated Compliance Engine for token issuers. Chainlink previously presented to the Commission on interoperability. Graus said he would stay within his expertise, the market itself, and leave policy implications largely to inference and Q&A.

Why Agents Have Not Yet Taken Off On-Chain

The long-held industry view is that AI agents should eventually be primary blockchain users: they operate 24/7 like the markets, read code and contracts well, and stablecoins suit the micropayments agents need. Despite many agentic wallets and payment standards (he cited x402 and Stripe's machine payments protocol), verifiable on-chain agent activity remains small. He said this view is Chainlink's but broadly matched what he heard from both AI and crypto participants at a recent Google Web3 AI conference.

Challenges he identified:

- Many protocols and chains do similar things (Morpho, Aave, Kamino, and others), and even one protocol is deployed on several chains.
- The on-chain environment is uniquely hostile: constant spam and theft attempts.
- Tooling is fragmented, built by protocols and the community, with unclear safety and coverage.
- Mistakes are usually irreversible; funds sent to the wrong contract or address are not recoverable.

To perform a single action such as depositing for yield, an agent must resolve the user's intent, discover and compare options, move capital if needed, build the transaction correctly, and get it on-chain. Each stage contains further sub-decisions (where to search, how yield is defined, what risk and which chains are acceptable).

False Confidence, Guardrails, and the Trust Gap

Graus flagged a policy-relevant gap: the user asks for "the best yield on my USDC" and sees only the result, not the near misses, retries, or wasted gas underneath. The agent's value is hiding that complexity, but it can produce false confidence, particularly as users shift from highly technical to non-technical.

The industry recognizes trust as the primary gap and is investing heavily in guardrails, such as spending limits over a period or allow-lists of destination addresses. His view is that guardrails are necessary but not sufficient: they define what an agent may not do, but do not ensure that the agent succeeds, and succeeds well, within its permitted scope.

Chainlink's Approach

Graus described Chainlink's role in earlier trust shifts: trusted price data that made DeFi liquidations predictable, and security-first cross-chain bridging after a period of bridge hacks. The agents product applies the same approach:

> Agents can discover the service, register, and pay autonomously through a gateway that accepts stablecoin micropayments, with no human in the loop. This departs from Chainlink's usual sales-and-contract model, and he expects many software services to adopt similar pay-per-use access as agents gain the ability to pay. The decentralized node capacity behind these endpoints has real costs, which micropayments cover granularly.
>
> Fixed, deterministic workflows execute on a decentralized node network. The agent states its goal, pays a fraction of a cent, and receives a correctly built transaction to sign, so that it interacts with the right contracts within scope and the transaction reaches the chain. The agent reserves its reasoning for monitoring and decision-making rather than execution.
>
> Agent identity: on-chain, an agent is only an address, which will not satisfy issuers of traditional-finance assets, especially when one entity may run hundreds of agents with different mandates. Chainlink is working with the ERC-8004 agent identity effort on Ethereum to integrate its compliance engine, so an agent can inherit KYC or other identity credentials from its operator at the time of execution.

He compared the present to internet payments before eBay and PayPal, when entering a credit card online was considered reckless. That changed through security and practice improvements, and he expects the same shift for agent payments, on-chain and off. He added that agents must be tied to a human operator for legal reasons and, most urgently, so they can purchase regulated assets issued on-chain.

Q&A and Commission Discussion

Q (Kisch): How do you get from a user's prompt to a correctly identified intent that starts the cycle you laid out?

A (Graus): That is the core difficulty and a principal-agent problem: the point of an agent is that the user need not be precise, so the agent may do something the user did not want but

never excluded. Guardrails defining allowed tokens, contracts, and chains probably remove about 80% of high-risk errors. The remainder depends on improvements on the AI side in how models interpret user intent over time. Kisch summarized this as narrowing the universe of possible actions to improve accuracy and outcomes; Graus agreed.

A (Graus, continued): Some guardrails are hard to express on-chain. "No more than 10 tokens" is easy; "no more than $10 of any token" is hard for a fluctuating asset because its value is not natively available on-chain. That is the kind of problem Chainlink's data services address.

Comment (Ammon): The task is a deterministic boundary around non-deterministic software. Kisch added that a dollar-value limit requires an oracle call for the current price at the moment of exchange, an interdependency Chainlink already serves.

Comment (Ammon): The Commission is also charged with studying tokenized real-world assets. Once agents trade such assets on a person's behalf, matters become very complicated.

A (Graus): Agreed. He holds most of his own assets as stablecoins in DeFi and said that tax preparation is a nightmare even with expensive crypto tax software, especially across chains and newer protocols. Agents will make this much worse, moving from thousands of transactions per user to potentially hundreds of thousands as agents continuously rebalance.

Graus agreed to send his slide deck for posting on the Commission website. Mark Gaal of Chainlink had nothing to add.

IV. PRESENTATION: JOE HEALEY, FISERV – DIGITAL ASSET TOOLS FOR COMMUNITY BANKS AND THE ROUGHRIDER COIN

Presenter: Joe Healey, Head of Digital Assets, Fiserv (remote), joined by Josh Siegel

Duration: Approximately 39 minutes of prepared remarks plus 11 minutes of Q&A

Introduction and Background

Commissioner Kisch introduced Healey and asked him to cover Fiserv's work with the Bank of North Dakota on the Roughrider coin, the importance of tools that let banks of all sizes protect their deposit base so they can keep lending locally, and Fiserv's broader ambitions. The Chair recalled that Chainlink is also involved in the Roughrider project; a Chainlink representative said he believed so.

Healey spent 17 years at StoneCastle, whose business was building tools for community banks: a regulatory capital investing arm, a deposit network of about 1,100 banks placing institutional, governmental, and high-net-worth deposits into community banks as low-cost funding, and, about three to four years ago, StoneCastle Trust Company, a New Hampshire

non-depository trust company formed for cash custody. In December 2025, Fiserv acquired the deposit network and the trust company.

The Problem: Community Bank Deposits Under Pressure

Healey's team speaks with 300 to 400 community banks a month. He described the community bank flywheel: local deposits fund local business loans, which create jobs and further deposits. Branch location once drove deposit growth. Beginning around 2017, venture-funded fintechs and neobanks competed on differentiated features and customer acquisition spending, and digital-asset companies (he named SoFi, Robinhood, and Coinbase) now embed banking experiences.

He cited a countervailing "go local" tailwind, stating that the average millennial spends 163% more locally than the median, that 48% say they do so to support the local economy, and that many will pay more to keep money local.

On stablecoins, he said Circle and Tether have converted more than $260 billion since 2019 into instruments that are, underneath, roughly 90% money market fund-type holdings: bank deposits converted into money market funds and lent through repo and Treasuries rather than through the banking system. He quoted Andrew Silsby of Kennebec Savings Bank: "We can't lend if we don't have deposits." He stated that half of Americans are employed by small businesses and that community banks make about half of small business loans while holding about 12% to 15% of deposits.

Fiserv's stated mission is to give financial institutions digital-asset features (instant, 24/7, programmable money movement) while letting them retain deposits, with the complexity orchestrated behind the scenes and surfaced through existing cores and online banking, including a digital wallet shown alongside the customer's checking and savings accounts.

Fiserv's Digital Dollar Network

Products described:

FIUSD, a GENIUS-compliant stablecoin.
A multi-bank tokenized deposit (referred to in the presentation as FIUSDT), with the same deposit-retention purpose but a different structure.
INDX, an existing real-time fiat movement system.
A MiCA-compliant stablecoin in development for Fiserv's global payments business.
Custom closed-loop tokens such as the Roughrider coin.

Roles in the stack: Fiserv as orchestrator and core integrator; participating financial institutions, which record tokenized deposits as their own deposits and retain onboarding, KYC/KYB/CIP, and customer support; issuers, which hold the issuer key authorizing on-chain mint and burn (for a stablecoin, the current view is that an OCC-chartered bank is the best-suited issuer under GENIUS); and reserve management and custody of records through the New Hampshire trust company. Healey stressed that the trust company is not becoming a custodian of digital assets and remains a cash custodian, keeping funds at community

banks as StoneCastle has for 17 years, over which it processed more than $230 billion. Banks have told Fiserv they do not want to become digital-asset companies or exchanges.

Design principles described:

> Ledger-first tokenization: the transaction is recorded on the bank's core first, cash moves into custody, and only then is a token minted (a "funds good" model). Banks need not create new account types or change reporting.
> Fail-safe issuance: if any control fails or times out, the mint is blocked.
> 100% reserves in overnight bank deposits, with no leverage or maturity transformation, so tokens always redeem at par. "A dollar is a dollar."
> Hub-and-spoke reserves held as deposits at participating banks under custody for the benefit of token holders, with beneficial-owner records kept line by line for FDIC pass-through insurance where applicable.
> One-step mint-and-send to a bank's wallet, a customer's wallet, or an external wallet such as MetaMask. Bank wallets use an embedded MPC wallet.
> Optional end-of-day auto-burn returning banks to cash before closing their books, which many banks requested.
> Token delivery in under 90 seconds. The process can technically complete in under two seconds; the window is a deliberate control period for multi-party validation, wallet sanctions and OFAC screening, audit records, and reserving.
> Fiat settlement and end-of-day netting by same-day ACH and wire. The tokens complement those rails and do not replace them.
> Freeze, seize, and recall functions for failed settlements, errors, and consumer protection, analogous to ACH return codes. Configurable sanctions screening and transaction monitoring, similar to existing bank processes.
> Full audit trail of every mint, burn, reserve, and settlement event, designed to look familiar to bank examiners. About 200 banks gave design feedback over the past 12 months, and Fiserv has consulted examiners.
> Governance options for closed-loop networks: a lead bank, a council managing participant access, and configurable reserve arrangements.

The Roughrider Coin (Bank of North Dakota)

Roughrider is a U.S. dollar-backed token issued on a public blockchain and available only to state-approved in-state banks and credit unions. The Bank of North Dakota, which serves as a correspondent bank to roughly 90 institutions in the state, acts as lead bank. The initial use is an intraday tokenized settlement rail among those institutions, with dollars remaining as deposits in the participating banks and Fiserv handling settlement mechanics. Structured metadata can be attached to each transfer (for example a loan ID for a payoff), like wire or ACH notations, and the same smart contracts can later automate escrow releases and similar payments.

He stated that Roughrider and Fiserv's other tokens are not algorithmic or rebasing, are not yield-bearing, are not pooled investment products, and are not open networks. Closed loops

Video: youtu.be/uVqpWyuJ8fo

can later be broadened to customers in the state or beyond at the participants' choice. Healey praised the controlled-rollout approach.

Healey offered to work with New Hampshire on discovery, design and scoping, and a pilot if there is interest in a New Hampshire network, and offered the Commission a full platform demonstration, including audit traceability.

Q&A and Commission Discussion

Q (Canaday): As value moves between tokenized deposit and stablecoin form, where does the interest earned on reserves go?

A (Healey): When a token sits in a wallet at a participating bank it is a tokenized deposit, a usable deposit for that bank. When it leaves the network, the system debits the dollar already in custody, moves it to another custody form, burns the tokenized deposit, and issues a stablecoin, in real time and without swaps. He compared the structure to StoneCastle's long-running FICA product, which fractionalizes large deposits across banks for extended FDIC coverage. He confirmed Canaday's understanding that banks have the use of funds in deposit form while economics differ in stablecoin form, said the goal is never to raise banks' cost of funds, acknowledged that regulation treats who may pay or earn on reserves differently across the two forms, and offered to share the mechanics.

Q (Ammon): Why did you choose New Hampshire for the trust company, and what does it hold?

A (Healey): StoneCastle had always used a third-party institutional custodian and wanted its own for vertical integration and product development. It evaluated four states. New Hampshire stood out for its experience with asset managers, many Boston-based, and because regulators understood that the company sought to be a custodian for its own business lines and not a traditional estate-planning trust company. It custodies only cash (bank deposits) and keeps the beneficial ownership records underlying each omnibus deposit.

Q (Ammon): New Hampshire regularly sees bills to create a state bank, which the Chair said is not practical here. He had assumed Roughrider was simply the state bank issuing its own token. Please elaborate on the participating banks.

A (Healey): The Bank of North Dakota is lead bank with about 92 participating institutions, in effect a closed-loop consortium. The lead bank controls major decisions, including admitting institutions. A state does not need its own state bank to run this model; Fiserv has other frameworks that groups are considering or implementing and can share them.

Q (Ammon): What is the value of a state issuing or backing a token? Is geographic ring-fencing of economic activity part of it?

A (Healey): Ring-fencing to date has mainly served controlled rollouts. A lead bank maintains an approved list of wallets eligible to mint, burn, receive, and hold the token.

Participants can begin with principal payments among themselves, implement the new compliance policies and workflows, then expand. The closed loop can be kept, widened, or removed over time.

The Chair told Healey this was the Commission's last meeting for presentations, so any demonstration would have to be arranged separately, and that his contribution will be reflected in the final report.

V. PRESENTATION: KRISTY MERRILL AND JIM KISCH – THE BANKCHAIN ALLIANCE

Presenters: Kristy Merrill, President and CEO, New Hampshire Bankers Association, and board member, BankChain Alliance; Jim Kisch, Commission member (both in person)

Duration: Approximately 12 minutes of prepared remarks plus 5 minutes of Q&A

Origin and Structure

Merrill thanked the Chair and Commission, saying the Association had learned a great deal from the meetings. The BankChain Alliance was announced a few weeks earlier. It is designed by banks and will be owned and governed by the banking industry, which distinguishes it from other networks presented to the Commission. The consortium includes 40 state bankers associations, with the New Hampshire Bankers Association among the original members. Those associations collectively represent more than 3,400 banks and $22 trillion in assets. Merrill noted this is the associations' membership, not the number of banks signed up.

The network is meant to serve banks of all sizes. Community banks often struggle to access technology, depend on third-party vendors' terms and timelines, and cannot move quickly. Some large banks already participate in other networks (she cited the Cari Network). BankChain is intended to interoperate with those networks, not compete with them. Real-time settlement already exists elsewhere; the working group sees programmable payments as the minimum viable product.

Stated principles: fair (every institution treated fairly regardless of size); accretive (each bank gains more than it gives); bank-grade security; innovation through interoperability; and simple, meaning core-agnostic, which matters because banks are heavily dependent on their core providers.

On timing, Merrill cited the regulatory framework being built under the GENIUS Act, the CLARITY Act still pending, mature technology, and growing volume on non-bank rails. She repeated the Silsby quotation and said the difference with banks is that deposits support local lending. An RFP for a technology partner is underway; its principles include equity opportunities and voting rights for banks, privacy, regulatory compliance, and programmability.

Video: youtu.be/uVqpWyuJ8fo

Tokenized Deposits and Programmability (Kisch)

Kisch said the day's earlier presentations were the ideal setup. He walked through an example: he holds a deposit token reserved one-for-one at his bank and sends the dollar equivalent to a person who banks elsewhere. Ownership changes immediately, and the fiat backing must then move between the two banks by end of day, which is why a consortium handling fiat settlement is needed.

Adding programmability, the same transfer could be held in a smart-contract escrow until a lien waiver is acknowledged, then released automatically. The Alliance wants members to identify consumer and commercial use cases wherever "if-then" logic applies and collaborate on robust, jointly governed smart contracts, comparable to the contract functions Schwab displayed, so banks can build what their own communities need.

Governance: a 15-member board balanced among community banks under $10 billion in assets (six seats), banks of $10 billion and above, and state banking associations, so that the largest and best-resourced institutions do not carry outsized weight.

Q&A and Commission Discussion

Comment (Ammon): Governance could itself be conducted on-chain. He noted that UNH is building a registry for the Secretary of State's office under New Hampshire's DAO legal-personhood legislation. Kisch noted the appeal of immutable records and audit history.

Q (Canaday): Is an example of programmability a real estate closing on a weekend, with funds moving on a signal instead of waiting for Monday?

A (Kisch): Yes, one of dozens of cases. In practice, bottlenecks often sit elsewhere, such as appraisal turnaround, so the Alliance is starting with the simplest enhancements. The Chair observed that banker's hours may eventually become a thing of the past.

VI. PUBLIC COMMENT

The Chair invited public comment, noting this was likely the last opportunity before the Commission turns to its report.

Woody Canaday said he looks forward to the result and is mainly interested in the educational side for the Osher course he is designing. He called the meetings a fantastic learning experience and "a fire hose," with the challenge of simplifying for a less familiar audience without losing content. He added that, compared with several months ago, solution sets now seem more available, particularly for the banking community's concern about stable tokens draining deposits, and called the Fiserv presentation a capstone.

Karen Parker Feld echoed the difficulty of simplifying the material and reported progress in presenting it to lay audiences. She asked whether drafts of the Commission's report would be made available to the public and whether the Commission wants comments. The Chair said drafts will be released at key points, likely one or two drafts after internal discussion, and that comments are welcome but the process must stay focused.

VII. COMMISSION DISCUSSION & STRATEGIC PLANNING

Quorum

The Chair stated for the record his disappointment at the lack of a quorum given the effort invested by presenters and attendees, while acknowledging it is campaign season.

CLARITY Act

The Chair reported that the U.S. Senate did not pass the CLARITY Act in its recent vote. There are rumors of another vote before the midterm elections, which he could not confirm. He said the public sticking point was ethics provisions concerning the President's digital-asset activities, characterized meme coins as the fringe of what the technology can do, and noted such launches have occurred across the political spectrum. He expects the bill to return. Meanwhile, the CFTC and SEC are implementing much of the CLARITY framework through rulemaking, which the state will need to monitor.

Final Report Process

This was the Commission's final meeting for presentations. The report deadline is November 1, 2026. The Chair emailed members earlier in the week and outlined the plan:

> The Chair will circulate an initial outline (major topics and flow) for member comment, then fill it in over a couple of iterations.
> Because all Commission content is in one place, agentic tools can help summarize it and check for omissions, with human oversight of arrangement and emphasis.
> Drafting sessions will be held online by Teams. The Chair will poll members to maximize attendance, because a quorum is needed for members to sign off on the report.
> The report will include a glossary and an appendix, plus a section in which state departments may state their own positions or points of disagreement.
> One or two drafts will be released for public comment at key points.

Kisch closed by crediting the Chair's behind-the-scenes work in arranging the day's presentations. The Chair said he has built relationships across the industry nationally and aims to bring attention to New Hampshire.

VIII. NEXT MEETING

Date: Not set. The Chair will poll Commission members for dates.

Time: TBD

Location: Online via Microsoft Teams (report drafting sessions)

Additional Business: Approval of the May 13, August 19, and September 17, 2026 meeting minutes; final report outline and drafting

Video: youtu.be/uVqpWyuJ8fo

ACTION ITEMS

Chair to poll Commission members for report-drafting meeting dates that secure a quorum.
Chair to circulate an initial outline of the final report to Commission members for comment.
Chair to carry approval of the May 13, August 19, and September 17, 2026 minutes to the next meeting with a quorum, and to make a final attempt to locate the August 19 recording.
Rowland Graus to send the Chainlink slide deck; Chair to post the day's presentation materials and meeting video to the Commission website.
Healey (Fiserv) to share details on reserve economics across tokenized-deposit and stablecoin forms, and closed-loop network frameworks that do not require a state bank; any platform demonstration to be arranged outside Commission meetings.
Commission to monitor CLARITY Act developments and related SEC and CFTC rulemaking.
Final report due November 1, 2026.

Meeting Adjourned: 12:29 PM

Respectfully submitted,

Keith Ammon, Chair

Approved on October 15, 2026

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Note: These minutes were generated by Claude from the Microsoft Teams meeting transcript and a backup audio transcript, with minor corrections for spelling and context. Microsoft Teams attributed all in-room speech to a single room account; in-room speakers were identified from context.

NEW HAMPSHIRE STABLE TOKEN STUDY COMMISSION

Date: October 15, 2026

Time: 10:04 AM to approximately 12:06 PM

Location: 1 Granite Place, Room 229, Concord, NH 03301

In-person with remote participation via Microsoft Teams

Minutes

ATTENDANCE

Commission Members Present

Keith Ammon, Chair (Hillsborough 42)
Michael Moranti (Deputy Commissioner of Banking, Banking Commissioner's designate)
Katie Taylor (Staff Attorney, Bureau of Securities Regulation, Secretary of State's designate)
Jim Kisch (Passumpsic Bank, banking industry representative, remote)
Seth Oranburg (Professor of Law, The Catholic University of America, Columbus School of Law, remote; joined at approximately 10:10 AM and left at approximately 10:47 AM)
Jim Kofalt, Vice Chair (Speaker Pro Tem, Hillsborough 32, remote; disconnected shortly after roll call and did not rejoin)

Commission Members Absent

Sen. Tara Reardon (New Hampshire Senate, District 15)
Sen. Daryl Abbas
Chris McAleer (Carroll County District 2)
Brandon Garod (Senior Assistant Attorney General, AG's designate)
Andy Schwab (Blockchain industry representative)
Dan Nuñez Cohen (Head of Policy, Crypto.com)

Other Officials and Members of the Public

Jessica Calipulidis (Hearings Examiner, NH Banking Department, remote; spelling of surname to be confirmed)
Jim Karras (NH State Treasury, remote)
Jennifer Ramsey (Tax Policy Counsel, NH Department of Revenue Administration, remote)
Ashley Scott (Circle, remote)
Karen Parker Feld (member of the public)

I. OPENING & COMMISSION BUSINESS

Chair Ammon called the meeting to order at 10:04 AM. He noted that the Commission had met almost monthly for a year, with a summer break, and that the purpose of the meeting was to review the first draft of the final report, which is due November 1, 2026, and to take members' feedback. Links to the agenda and the draft were posted in the Teams chat.

Roll call: Kisch and Kofalt were present online; Moranti, Taylor, and the Chair were present in the room. With five members present, the Chair declared a quorum. Guests online introduced themselves. Kofalt then disconnected before any votes were taken. Oranburg joined online at approximately 10:10 AM, restoring five members.

No changes to the agenda were requested. Approval of minutes was postponed until a quorum could be confirmed (see Section III).

II. FIRST DRAFT OF THE FINAL REPORT

The Chair presented the draft he called version 2, compiled from the Commission's meeting record with the help of agentic tools. Changes from version 1 are marked in yellow, with a summary box at the top. He asked members to make their comments on the record during the meeting, since the meeting video and transcript would drive the next revision. He will circulate a revised version that incorporates the comments, with all changes labeled, and intends to finalize the report over the next two weeks. The Chair reviewed the draft section by section.

Transmittal Letter, Disclaimer, and Executive Summary

The transmittal letter is not yet drafted and will follow the standard form. The report will go to the Governor, the Speaker of the House, the Senate President, the State Library, and the House and Senate commerce committees. The disclaimer states that members participate in their personal capacity and do not represent their employers or departments; members were invited to suggest stronger language.

The Chair proposed that the executive summary take the position that New Hampshire should get ahead of digital finance rather than wait and see. Kisch and other members voiced support, citing the GENIUS Act timeline. The Chair will expand the executive summary.

Bills and Scope

The draft groups its recommendations into three bill packages (Bills A to C). The Chair noted that a Banking Department draft related to Bill A has been filed as a legislative service request. A member asked that the term "builder" be defined.

Oranburg recommended that the report state that it does not address tokenized securities. The SEC had moved to permit tokenized securities less than two weeks earlier, and the Commission had not taken evidence on the subject. He suggested distinguishing real-world assets from tokenized securities, possibly in a footnote or as a topic for a future body, and offered to provide the SEC references. Other members agreed. Members also asked that the report make clear that crypto-backed securities do not fall to the Banking Department (Recommendations 7 and 8).

Findings

The Chair read the 15 findings. Comments:

Finding 2 (market size): may need clarification that the market exists and is growing.
Finding 7 (a state token and community banks pull in opposite directions): may need revision in light of the Fiserv presentation, in which a state bank and community banks worked together.
Finding 9 (privacy): the Chair stated his intent to emphasize privacy under Part I, Article 2-b of the New Hampshire Constitution.
Finding 13 (New Hampshire foundations): a member asked that the title name the specific foundation, for example the interoperability lab.

Recommendations

The Chair reviewed the 13 recommendations in the draft list. Comments:

Recommendation 4 (tokenized deposits): Kisch confirmed it captures any statutory changes banks would need.
Recommendation 5 (safe harbor for builders): the Chair asked members to consider what guardrails a safe harbor would need.
Recommendation 6 (Office of Financial Innovation): the Chair described the parallel to the Office of Energy Innovation. A member asked whether it should be a separate bill, since neither LSR 2027-0200 nor LSR 2027-0239 includes the office. The Chair said a fourth bill is possible, and the member suggested the office stand on its own.
Recommendation 8 (tokenized real-world assets): Jennifer Ramsey of the Department of Revenue Administration confirmed the Chair's understanding that the real estate transfer tax could be triggered by each trade of a token backed by real estate held in an entity. The Chair proposed that the report identify the issue for further clarification rather than resolve it.
Recommendation 9 (privacy and CBDC): Karen Parker Feld noted that the federal CBDC prohibition was expected to be included in the National Defense Authorization Act but was not, and raised concern about private versions of the same controls.
Recommendation 11 (federal rules and interstate cooperation): the Chair noted that LSR 2027-0200 (Rep. John Hunt) is expected to place less detail in statute and more in rulemaking.
Recommendation 13 (state token study, tokenized municipal bond pilot): the Chair saw no appetite for a New Hampshire state token but recommended monitoring any multistate consortium. The tokenized municipal bond pilot, citing Quincy, Massachusetts, may be moved to the list of topics outside the report's scope.

Introduction and Landscape

The Chair described the report's mandate, membership, appendices, "outside the record" labeling, and the limits of the record (most presenters had a stake in the outcome). Members clarified that the Conference of State Bank Supervisors is an association of state bank regulators. The report references the 2022 commission, whose work led to the DAO legal enterprise law and

the blockchain dispute docket. Members agreed the landscape timeline should stop as of mid-October, with later events labeled as outside the record.

In the token comparison table, a member asked that the regulator for tokenized money market fund shares read "securities regulators (state or federal)" rather than "SEC." Members agreed that algorithmic stable tokens should be explained and noted as not addressed by the report. Kisch suggested language explaining that the variety of designs reflects different purposes rather than disorder, and will send wording. On market size, members discussed noting that the $313 billion figure does not distinguish GENIUS-compliant tokens.

III. APPROVAL OF MINUTES

At approximately 10:43 AM, with Oranburg about to leave to teach a class, the Chair confirmed a quorum of five (Ammon, Moranti, Taylor, Kisch, Oranburg) and took up the three sets of minutes carried forward from September 17.

> May 13, 2026 minutes: moved and seconded; approved 5 to 0.
> August 19, 2026 minutes (reconstructed): moved and seconded; approved by voice vote with no opposition.
> September 17, 2026 minutes: moved to approve as presented and seconded; approved by voice vote with no opposition.

Oranburg then left the meeting. No further votes were taken.

IV. FIRST DRAFT, CONTINUED

Federal Picture and State Certification

The Chair summarized the GENIUS Act and noted that the companion CLARITY Act was not enacted, though much of it is being carried out through agency rules. On New Hampshire today, he noted the Secretary of State's DAO registry plans to accept stablecoins for fees, Fiserv's acquisition of StoneCastle Trust Company, the Business Finance Authority's Bitcoin-collateralized bond, LSR 2027-0200 (Rep. John Hunt), and LSR 2027-0239.

Members discussed the $10 billion threshold for state issuers and the federal comment periods, including the January 18 date discussed with CSBS on March 10. Members agreed the report should recommend that state agencies consider submitting comments in federal rulemakings, and that the report point the public to where those notices are published, since individuals may comment directly.

Deputy Commissioner Moranti agreed the Banking Department is the logical supervisor for payment stablecoins that are not securities. Asked about resources, he said the Department would assess staffing after enactment, usually over about two years. He does not expect a staffing change at first, because the work is similar to existing bank and money transmitter supervision and examiners are already trained in blockchain and crypto. Licensing and examination fees would be expected to cover costs.

Ashley Scott (Circle) said the GENIUS Act requires an initial federal certification of a state regime and annual recertification, the process for which Treasury has not yet set. Circle is currently the only issuer near the $10 billion threshold; the one larger issuer is foreign. She recommended that New Hampshire's statute bar digital asset service providers from offering stablecoins that are not state-licensed, federally licensed, or registered foreign issuers, and that the statute use the GENIUS term "digital asset service provider" (DASP).

Tokenized Deposits, Freezes, and Yield

A member noted that banks issuing tokenized deposits are using FedNow for instant settlement. The Chair reviewed the freeze and seize requirements and their relation to Part I, Article 2-b. On yield, members asked for clarification on whether the OCC's rebuttable presumption about affiliate yield is a proposal or a final rule (Section 4.2).

Real Estate Transfer Tax

Ms. Ramsey said any change would be a policy decision for the Legislature, but the Department of Revenue Administration could provide data on holding company transfers and revenue effects. The Chair will follow up on the specific request (Porcupine Properties, February 10 meeting). Members observed that tokens used both as payment and as real-world asset interests will raise harder questions, and asked that the section be expanded. The Chair briefly explained custodial and non-custodial wallets.

Financial Stability and Network Effects

Deputy Commissioner Moranti confirmed the approximately $1 billion figure was crypto money transmission by Department licensees in one quarter of 2024. He explained that the Department regulates licensees that handle fiat, not their stablecoin transactions. Members could not recall the source of the $1.9 billion deposit outflow figure (Section 4.4) or the quotation on the Department's self-funded model from May 13; both will be checked. Moranti said the Department funds itself through per-institution payments, asset-based assessments, and licensing and examination fees, and that his concern about deposit outflows is for consumers more than for the Department's budget. Taylor indicated the issue does not arise for the Bureau of Securities Regulation, since payment stablecoins are not securities.

The Chair explained network effects. Members agreed the report should mention Wyoming's stated interest in interstate compacts while noting that no compact has formed. Kisch found the BankChain Alliance description accurate.

Consumer Protection, Privacy, and Economic Opportunity

A member suggested the report ask what makes stablecoin market risk different from other markets, for example 24/7 trading and agentic activity. Another member asked that the report highlight Oranburg's suggestion from the March meeting of a mark showing New Hampshire consumers that a stablecoin is GENIUS-compliant and meets any state standard. The Chair discussed freeze and recall controls, the OCC report on debanking, agentic payments, and pseudonymity.

A member recommended adding a "see" signal before the citation to State v. Zarella, 177 N.H. 328, because the report draws an inference from that case. The Chair asked Karen Parker Feld to

review the risk management section; she said it looked good. Members raised no objection to noting that LayerZero's co-founders are UNH alumni. A member noted that the tokenized real-world assets section may need revision consistent with the carve-out of tokenized securities. Members suggested moving the Business Finance Authority bond to the section on prior New Hampshire activity. The Chair will expand Section 8.6 (agentic commerce) and noted that blockchain-based trusts turn on the meaning of "sufficiently decentralized."

V. PROCESS TO THE FINAL VOTE

The Chair noted the Commission lacked a quorum to vote on the draft. Members agreed on the following process:

- Members will read version 3 of the draft before the next meeting, and the Commission will first approve all findings and recommendations without objection, then take up the disputed ones.
- Members who propose a new finding or recommendation should send it to the Chair at least two days before the meeting so it can be included in the read-ahead.
- Departments and members may submit their own statements for the report's appendix.
- Because of RSA 91-A, members will not deliberate by shared online document. The Chair will post submitted comments on the Commission website.

VI. NEXT MEETING

Date: Thursday, October 29, 2026

Time: 10:00 AM

Location: Statehouse, Concord (to be confirmed); backup location NH Banking Department

Additional Business: Approval of October 15, 2026 meeting minutes; vote on the final report

ACTION ITEMS

- Chair to circulate a communication to members and prepare version 3 of the draft from this meeting's transcript, with changes labeled.
- Chair to add a carve-out for tokenized securities with references to the recent SEC action; Oranburg to provide SEC citations.
- Chair to revise Finding 7, the Finding 13 title, the token table (securities regulators), the algorithmic stable token note, the market size note, Section 4.2 (yield presumption), the transfer tax section, Section 8.6, and the State v. Zarella citation.
- Chair to verify the $1.9 billion outflow figure (Section 4.4) and the May 13 quotation on the Banking Department's funding model.
- Kisch to send language on the purposes behind different network designs.
- Department of Revenue Administration (Ramsey) to provide data on holding company transfers subject to the transfer tax once the Chair specifies the request.

Members to send new findings or recommendations to the Chair at least two days before October 29; departments and members to submit any statements.
Final report due November 1, 2026.

Meeting Adjourned: approximately 12:06 PM

Respectfully submitted,

Keith Ammon, Chair

Approved on October 29, 2026

Note: These minutes were generated by Claude from the meeting video (YouTube) using a local machine transcript, with corrections for spelling and context. The transcript does not label speakers; where a speaker could not be identified from context, the minutes refer to "a member."

NEW HAMPSHIRE STABLE TOKEN STUDY COMMISSION

Date: Thursday, October 29, 2026

Time: 10:04 AM to 12:04 PM

Location: State House, Rooms 122-123, Concord, NH

In-person with remote participation via Microsoft Teams

Minutes

UNAPPROVED. These minutes were prepared by the Chair after the Commission's final meeting. They could not be approved by the Commission, because the Commission held no further meetings; it dissolved on November 1, 2026.

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ATTENDANCE

Commission Members Present

Keith Ammon, Chair (Hillsborough 42)
Katie Taylor (Staff Attorney, Bureau of Securities Regulation, Secretary of State's designate)
Jim Kisch (Passumpsic Bank, banking industry representative)
Michael Moranti (Deputy Commissioner of Banking, Banking Commissioner's designate)
Andy Schwab (Blockchain industry representative, remote)
Dan Nuñez Cohen (Head of Policy, Crypto.com, remote; joined at approximately 10:07 AM, during the vote on the October 15 minutes)
Seth Oranburg (Professor of Law, The Catholic University of America, Columbus School of Law, remote; joined at approximately 10:12 AM and left at approximately 10:49 AM)

Commission Members Absent

Jim Kofalt, Vice Chair (Speaker Pro Tem, Hillsborough 32; delayed by a flat tire on the way to the meeting)
Sen. Tara Reardon (New Hampshire Senate, District 15)
Sen. Daryl Abbas
Chris McAleer (Carroll County District 2)
Brandon Garod (Senior Assistant Attorney General, AG's designate)

Other Officials and Members of the Public

Jessica Kallipolites, attorney, Banking Department (in person)

I. CALL TO ORDER, QUORUM, AND MINUTES

Chair Ammon called the meeting to order at 10:04 AM. Members in the room (Ammon, Taylor, Kisch, Moranti) and online (Schwab) introduced themselves. For each remote member, the Chair asked whether anyone was in the room with them and asked them to turn on their video. Schwab and Nuñez Cohen each confirmed they were alone with video on. Oranburg, who joined while in transit, confirmed no one was with him and turned his camera off after checking in. With Nuñez Cohen's arrival, six members were present, and a quorum was confirmed. No changes to the agenda were requested.

The Chair noted that the report deadline for changes had been Tuesday at 4:00 PM, that version 4 was posted the day before, and that the agenda, version 4, and the list of changes from version 3 are on nh-token-commission.org.

October 15, 2026 minutes: The Chair noted two corrections already made (the sponsors of the LSRs and the State Library). Motion to approve by Kisch, second by Moranti. Approved by voice vote; Nuñez Cohen joined during the vote and was recorded as voting aye.

Correction to the February 10, 2026 minutes: The Banking Department had pointed out that questions about bankruptcy, eviction, and what happens when a rent-to-own token arrangement goes bad were attributed to Deputy Commissioner Moranti alone. The Chair reviewed the video and found that Moranti and Commissioner Emelia Galdieri were speaking together. Moranti added that Brandon Garod was also part of that exchange. Motion by Kisch, second by Moranti, to amend the February 10 minutes as presented, with the Chair given latitude to correct the spelling of the Commissioner's first name. Approved by voice vote with no opposition.

II. FOLLOW-UP ITEMS FROM OCTOBER 15

The Chair reviewed the follow-up items, all addressed in version 4.

Tokenized securities (§2.5): The Chair read the §2.5 limiting language stating that the Commission took no evidence on markets in tokenized securities and makes no recommendation on them. Oranburg said he liked the limiting language and noted that a major new tokenized-securities venue had recently launched. Taylor asked whether the Commission would also list markets in tokenized securities as an item for further study in Recommendation 13. See Amendment 1 below.

Purposes of different network designs (§3.1): Kisch confirmed that the §3.1 language captures his point that the variety of designs reflects specific purposes.

Transfer tax (§4.3): The Chair reviewed the Department of Revenue Administration's comments.

Deposit outflow estimate (Table 4.1, Finding 6): The revised American Bankers Association estimate (up to $1.7 billion) is reflected. A member raised the White House Council of Economic Advisers analysis as a counterbalance; the Chair noted it had not come up in the Commission's record. No motion was made.

Banking Department funding-model statements: Moranti said statements about the Department's funding model add no value to the report and should not be in it, as

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the Department is funded independently. The Chair set the item aside to return to under the contested items; no separate vote was taken on it.

III. SUMMARY OF CHANGES IN VERSION 4

The Chair reviewed the changes: the 120-day licensing decision matching the federal clock (Recommendation 1); no new statutory definition of "tokenized deposit," with Banking Department guidance confirming that tokenized deposits are deposits (Recommendation 4); the Office of Financial Innovation as a separate Bill D; the OCC's final GENIUS Act rule reflected in Findings 1 and 2; corrections on RSA 359-V:3 and the Roughrider Coin; and the expanded executive summary. On Recommendation 4, a member asked whether a parenthetical was needed to make clear which definition of "deposit" applies. After the Chair read the text, which cites the existing state definition at RSA 383-A:2-201(a)(18), the member was comfortable with it. A member said the additional context in the executive summary looked great.

IV. APPENDICES AND STATEMENTS

The Chair walked through the appendices.

Appendix F (department statements): The Banking Department will submit a statement. No statement had been received from the Attorney General's office.
Appendix G (member statements): Members online said they did not have a supplemental statement, and the Chair said he would strike the appendix and re-letter the appendices. Oranburg said he would review the remaining discussion and submit a statement later that day. Appendix G will remain in the report.
Appendix K (GENIUS Act certification detail): Members agreed to keep it as a single source of reference.
Presenters' interests: A member said it is important to disclose these given the amount of industry representation the Commission heard.

Oranburg's departure: At approximately 10:42 AM, Oranburg said he would soon have to leave to teach a class. He stated for the record that he had heard and approved of everything in the report up to that point in the discussion, and asked whether he could cast his vote in advance. The Chair said he did not believe asynchronous voting is allowed, welcomed a written statement, and noted that a quorum remained without him. Oranburg left at approximately 10:49 AM. Six members remained.

V. FINDINGS AND RECOMMENDATIONS

Method: Instead of taking Votes A to I and a roll call on Motions 1 to 15 as listed on the agenda, the Chair proposed reviewing Section 12 of the report in order. Items with no objection would stay as written and be adopted as part of the final motion; any change would be made by a separate motion. Members agreed. Moranti said that because many changes arrived after the Tuesday 4:00 PM deadline, he had not been able to fully review them, would likely abstain on many items, and would set out the Banking Department's concerns in its statement.

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Amendments adopted

Amendment 1, tokenized securities ($2.5 and Recommendation 13): Motion to adopt the limiting language in $2.5 and add markets in tokenized securities as a further-study item in Recommendation 13, with the Chair drafting from the transcript of the discussion. Moved by Oranburg, second by Kisch. Adopted by voice vote, one abstention (Moranti).

Amendment 2, Recommendation 5 (existing exemption): Motion to amend the "existing exemption" bullet to say the new chapter should not narrow RSA 399-G:3, VII, which exempts transfers of convertible virtual currency from money transmitter licensing, "as it applies to builders." Moved by Ammon, second by Kisch. Adopted by voice vote, one abstention (Moranti).

Amendment 3, Recommendation 7 (memorandum of understanding): Motion to strike the references to a memorandum of understanding between the Banking Department and the Bureau of Securities Regulation. Taylor noted that the agencies already meet several times a year on shared areas. The sentence stating that crypto-backed and tokenized securities are not for the Banking Department was kept. Moved by Taylor, second by Ammon. Adopted by voice vote, with Nuñez Cohen and Schwab voting aye.

Amendment 4, Recommendation 8 (securities guidance): Taylor said the securities guidance in Recommendation 8 did not match Bill B in the appendix, recommended against tying guidance to a particular SEC staff statement, and said the Bureau would benefit from further study before issuing guidance. Motion that the Bureau of Securities Regulation should engage in further study of the issue and, if necessary, publish guidance, with a conforming change to Bill B in the appendix. Moved by Ammon, second by Taylor. Adopted by voice vote, five ayes and one abstention (Moranti).

Amendment 5, Recommendation 10 (LSR 2027-0239): Motion to add the title of LSR 2027-0239, "establishing a task force to study emerging technologies and digital innovations in the areas of blockchain, cryptocurrency, artificial intelligence, and cybersecurity," next to the LSR number. Moved by Ammon, second by Moranti. Adopted by voice vote, all members present voting aye.

Amendment 6, Recommendation 12 and §9.3 (blockchain-based trusts): Motion that the Commission endorse further study of the concept of blockchain-based asset protection trusts, rather than the concept itself. The redraft timeline (introduction no later than the 2028 session) was kept. Moved by Kisch, second by Taylor. Adopted by voice vote, one abstention (Moranti).

Discussion without motions

Recommendation 1 (nationwide reach): A member asked whether joint state and federal supervision of issuers above $10 billion makes New Hampshire more or less competitive. Moranti explained that substantial similarity requires transition language for issuers above $10 billion. No change was made.

Recommendation 2 (compliance mark): A member raised whether a mark could suggest that the State issues, guarantees, or backs a token. Members agreed the details

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can be addressed in the bill process. Members also discussed how the limits on digital asset service providers would be enforced.

Recommendation 5 (money transmitter threshold): Members discussed a de minimis threshold above which a business would need a money transmitter license. Nuñez Cohen said a mandatory threshold is the more typical formulation. Moranti noted that the Department can issue no-action letters and lacks jurisdiction over consumer complaints against unlicensed businesses. Schwab supported keeping a distinction between builders and businesses. Taylor discussed binding answers for builders in light of RSA 359-V.

Recommendations 7, 9, 11, and 13, $12.6, and $$11.2 and 13: The Chair read these into the record without objection. Moranti confirmed that the $11.2 statement on approximately $1 billion of crypto money transmission by Department licensees in one quarter of 2024 is accurate. Members did not disagree with the report's treatment of environmental protection, namely that the systems discussed do not rely on proof-of-work mining. The Chair read the conclusion.

VI. VOTE ON THE FINAL REPORT AND AUTHORIZATION TO TRANSMIT

Final motion: To adopt the report and its findings and recommendations, as amended at this meeting, and to authorize the Chair to make conforming and editorial changes, format the report as a PDF, and transmit it. Moved by Kisch, second by Moranti.

Roll call

Taylor: aye
Kisch: aye
Moranti: abstain
Nuñez Cohen: aye
Schwab: aye
Ammon: aye

Result: Adopted, 5-0, with 1 abstention.

Statements: The Chair asked that department and member statements reach him by Friday, October 30, 2026 at 5:00 PM, so the report can be sent off then. He will post the adopted report online, as version 5, so statements can be based on it.

VII. PUBLIC COMMENT

Members of the public offered brief congratulations to the Commission. The Chair thanked members, presenters, and participants and noted he would speak with the two senators offline.

VIII. NEXT MEETING

None. This was the Commission's final meeting. The Commission ends November 1, 2026, and the report is due that day.

UNAPPROVED

ACTION ITEMS

Chair to incorporate Amendments 1 to 6 and conforming changes, format the report as a PDF, post it online, and transmit it by November 1, 2026.

Chair to correct the February 10, 2026 minutes as approved, including the spelling of Commissioner Galdieri's first name.

Banking Department to submit its statement (Appendix F) by October 30, 2026 at 5:00 PM.

Oranburg to submit any member statement (Appendix G) by October 30, 2026 at 5:00 PM. Appendix G remains in the report.

Meeting Adjourned: 12:04 PM

Respectfully submitted,

Keith Ammon, Chair

Not approved: the Commission held no meeting after October 29, 2026, and dissolved on November 1, 2026, so these minutes could not be submitted for approval.

Note: These minutes were drafted from the meeting video (YouTube, https://www.youtube.com/watch?v=agPR9tSyTok) using a local machine transcript, with corrections for spelling and context. Movers and seconders were confirmed by the Chair. The transcript does not label speakers; where a speaker could not be identified from context, the minutes refer to "a member."

UNAPPROVED

STABLECOINS AND DEPOSIT OUTFLOWS:

Implications for Community Banks in New Hampshire



Why It Matters

- Payment stablecoins total roughly $300 billion today and could grow to $1-2 trillion within a decade, potentially representing 5-10% of U.S. bank deposits.
- As stablecoin adoption grows, deposits may move out of the banking system, reducing a key source of funding for loans to households, small businesses, and local communities.
- Community banks are particularly vulnerable because they rely heavily on local deposits to support lending.

The Loophole

- Although the GENIUS Act prohibits payment stablecoin issuers from paying interest, some crypto platforms offer yield on stablecoin holdings.
- These products encourage consumers to move money from bank deposits into stablecoins, accelerating deposit migration from the banking system.
- Closing this loophole through the Clarity Act is critical to help preserve banks' ability to support lending and local economic growth.

Who Could Be Affected?

Small Businesses

Up to **$84.8M** reduction in lending
loans under $1M

Farmers & Ranchers

Up to **$768,000** reduction in lending
loans under $500K

Home Construction & Development

Up to **$30.7M** reduction in lending

Agricultural Operations

Up to **$1M** reduction in lending
loans under $500K

Commercial Real Estate Projects

Up to **$114.3M** reduction in lending
loans under $1M

The Impact on New Hampshire Communities

Community banks[1] headquartered in New Hampshire:	**17**
Community banks operating in New Hampshire:	**32**
Total deposits held at bank branches in New Hampshire:	**$17 billion**
Potential deposit outflows from New Hampshire banks to payment stablecoins:	**$0.9 billion to $1.7 billion**
Lost lending to New Hampshire households and businesses as a result of deposit outflow:	**Up to $1.60 billion**

1. Banks with total assets of less than $10 billion as of December 31, 2025.

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