# BECTRA

## USD1

# General analysis of reserves, the money market fund, redemption rights and multichain architecture

*Economic period analysed: 22 April 2025 – 31 July 2026*

| Metric | Value |
|---|---|
| Monthly reserve reports | 16 |
| Observations | 32 |
| Independent accountants | Crowe LLP, then KPMG LLP |
| Reserve fund | FRGXX — CUSIP 31607A703 |

## Executive summary

**RECONCILIATION —** All 32 observations reconcile arithmetically. At 31 July 2026, USD 4.001bn of redemption assets covered USD 3.997bn of redeemable tokens.

USD1 remained fully covered at both July observation dates. At 31 July, redeemable supply was USD 3.997bn and redemption assets were USD 4.001bn, down respectively 13.76% and 13.67% from 30 June. The decline in size is not evidence, by itself, of reserve deterioration.

The direct reserve comprised USD 1.101bn in Demand Deposit Accounts (27.53%) and USD 2.899bn in shares of the Fidelity Investments Money Market Government Portfolio — Institutional Class (FRGXX, CUSIP 31607A703; 72.47%). The assets legally held by the fund are economic look-through exposures and must not be added to the FRGXX shares.

The latest official Form N-MFP3 snapshot at 31 July shows a NAV of 0.9999, WAM of 40 days, WAL of 100 days, 59% daily liquid assets and 72% weekly liquid assets. The USD1 position represented approximately 1.39% of the Institutional Class and 1.07% of the series.

The decisive legal distinction remains unchanged: economic eligibility for the reserve mechanism does not grant every holder a personal redemption claim against BitGo. Direct mint and redemption access is limited to registered BitGo Clients with an active Account in Good Standing, subject to onboarding, AML/CFT, sanctions, jurisdictional, banking and operational requirements.

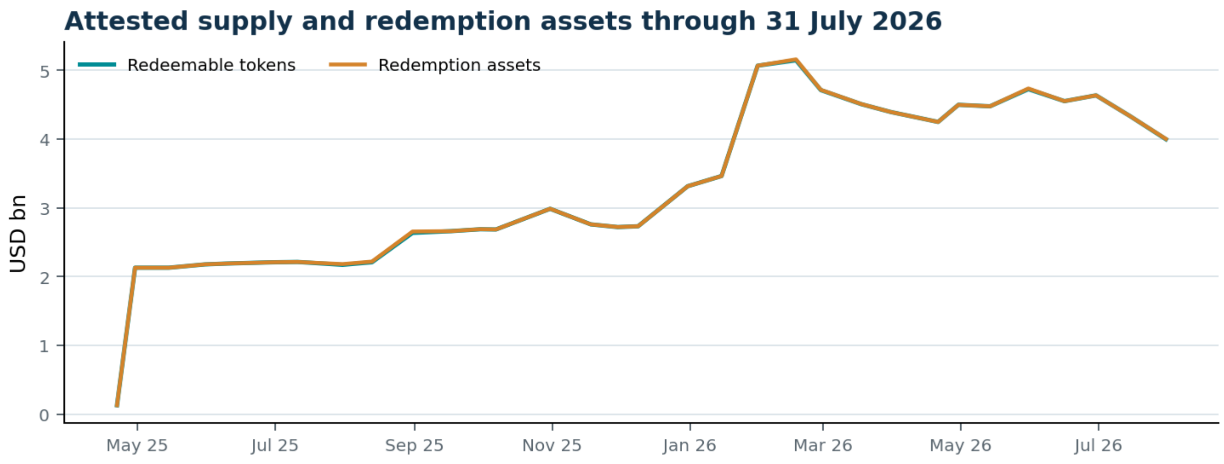


*Figure 1 — Redeemable tokens and redemption assets through 31 July 2026. Sources: USD1 reserve reports, Notes A–C.*

## End-August update — what changed

| Status | Item | Conclusion | Analytical effect |
|---|---|---|---|
| UPDATED | 31 July reserves | USD 3.997bn tokens; USD 4.001bn assets; 100.1086% coverage | Confirms point-in-time coverage; lower size without demonstrated quality deterioration |
| NEW | Note C discrepancy | Reported subtotal USD 4,338,561; recalculated USD 4,338,562 | Immaterial control finding retained without silent correction |
| UPDATED | FRGXX | NAV 0.9999; WAM 40; WAL 100; daily/weekly liquidity 59%/72% | High-quality fund profile; no guarantee of BitGo intraday liquidity |
| UNCHANGED | Direct redemption rights | Restricted to qualifying BitGo Clients in Good Standing | Token ownership does not create a universal direct claim |
| NEW | World Liberty Trust Company, N.A. | Preliminary conditional OCC approval | Prospective path only; BitGo remained issuer at cut-off |
| TO BE VERIFIED | PoR at 30 August | Official dashboard values were not determinable | 6 August snapshot retained without extrapolation |

**INFORMATION CUT-OFF —** 30 August 2026, 15:55:57 UTC. No attestation as of 31 August 2026 is assumed to exist.

# 1. Scope, method and evidence hierarchy

The quantitative corpus covers 16 monthly reserve reports from April 2025 through July 2026 and 32 distinct observation dates. The August update adds the FRGXX Form N-MFP3 at 31 July, OCC Corporate Decision 1385, the U.S. Treasury proposed GENIUS Act regulations and a current review of the BitGo terms.

| Level | Evidence | Use |
|---|---|---|
| 1 | Reserve reports, Notes A–C and examination reports | Amounts, entities, criteria, assurance and limitations |
| 2 | Applicable BitGo terms | Direct rights, Good Standing, processing, timing and discretion |
| 3 | SEC / Fidelity filings | FRGXX identity, NAV, assets, WAM, WAL, liquidity and look-through |
| 4 | On-chain / oracle information | Technical supply and PoR checks at a different date |
| 5 | Official WLF documentation | Brand, interfaces, networks and stated ecosystem roles |
| 6 | Official legal and regulatory texts | Legal status and regulatory developments |

## 1.1 Nature of assurance

Crowe LLP and, for June and July 2026, KPMG LLP performed examinations under AICPA attestation standards and expressed reasonable assurance opinions on management's assertion at the specified observation dates. KPMG's report dated 27 August 2026 relates to 15 and 31 July observations. The signature date is not a reserve observation date. The work is not a general audit of BitGo, World Liberty Financial, continuous reserve balances, smart contracts or internal-control effectiveness.

**DOCUMENTARY LIMIT —** A summary in more recent reports explains that the assertions are not subject to an accountant's examination for the periods before 6 May 2026. Conclusions are therefore tied to the precise Notes and dates.

# 2. Entity map and legal timeline

| Entity | Demonstrated role | Key limitation |
|---|---|---|
| BitGo Technologies, LLC | Historical issuer and mint/redemption operator through 11 December 2025 | Do not apply the OCC charter retroactively |
| BitGo Bank & Trust, N.A. | Issuer from 12 December 2025; national trust bank supervised by the OCC | USD1 is not a bank deposit and is not FDIC-insured |
| World Liberty Financial / SC Financial Technologies | Brand, ecosystem, documentation and distribution | Brand control is not a legal redemption obligation |
| World Liberty Trust Company, N.A. | Proposed future USD1 issuer under preliminary conditional approval | Not authorised to commence business at the cut-off |
| Fidelity / FRGXX | Fund manager and reserve asset | Underlying assets belong to the fund |
| Crowe / KPMG | Independent accountants | Opinion limited to the examined assertion |

**REGULATORY FACT —** OCC Corporate Decision 1385 dated 14 August 2026 grants preliminary conditional approval to World Liberty Trust Company, N.A. It does not make the transfer effective. BitGo Bank & Trust, N.A. remained the issuer at the information cut-off.

## 3. Reserve composition, evolution and coverage

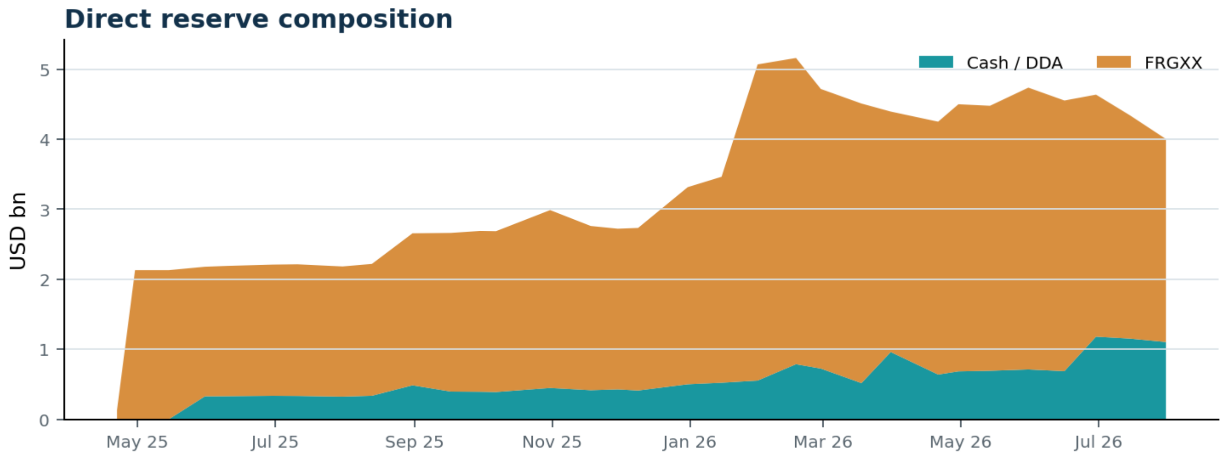


*Figure 2 — Direct redemption assets: cash/Demand Deposit Accounts and FRGXX shares.*

At 31 July, cash represented 27.53% of redemption assets, up 2.10 percentage points from 30 June, while FRGXX represented 72.47%. The point-in-time increase in cash is consistent with greater immediately available liquidity at the observation date, but one monthly point is insufficient to establish a durable strategy change.

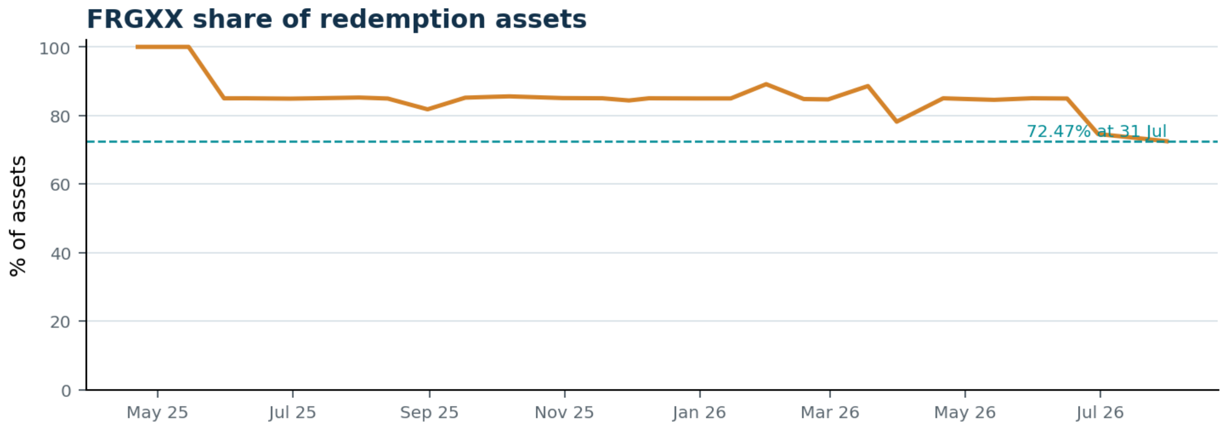


*Figure 3 — FRGXX share of direct redemption assets.*

### 3.1 Selected month-end observations

| Date | Tokens | Assets | Cash | FRGXX | Coverage | Final surplus |
|---|---|---|---|---|---|---|
| 30 Apr 2025 | USD 2.128bn | USD 2.128bn | USD 0 | USD 2.128bn | 100.0000% | USD 0 |
| 31 Aug 2025 | USD 2.635bn | USD 2.655bn | USD 483.8m | USD 2.171bn | 100.7596% | USD 10,194 |
| 31 Dec 2025 | USD 3.314bn | USD 3.314bn | USD 498.7m | USD 2.815bn | 100.0005% | USD 16,647 |
| 31 Jan 2026 | USD 5.067bn | USD 5.067bn | USD 551.4m | USD 4.515bn | 100.0004% | USD 20,690 |
| 28 Feb 2026 | USD 4.712bn | USD 4.716bn | USD 722.9m | USD 3.993bn | 100.0854% | USD 24,589 |
| 31 May 2026 | USD 4.725bn | USD 4.735bn | USD 710.2m | USD 4.024bn | 100.2030% | USD 88,311 |
| 30 Jun 2026 | USD 4.634bn | USD 4.635bn | USD 1.179bn | USD 3.456bn | 100.0038% | USD 176,579 |
| 15 Jul 2026 | USD 4.335bn | USD 4.340bn | USD 1.151bn | USD 3.189bn | 100.1220% | USD 254,053 |
| 31 Jul 2026 | USD 3.997bn | USD 4.001bn | USD 1.101bn | USD 2.899bn | 100.1086% | USD 392,388 |

### 3.2 Timing adjustments and the one-dollar discrepancy

At 31 July, the reproducible difference between redemption assets and redeemable tokens is USD 4,338,562. Note C prints "subtotal prior to timing difference" of USD 4,338,561. After deducting USD 3,946,174 of tokens redeemed but not yet settled, the published surplus of USD 392,388 reconciles with the recalculated subtotal, not the printed subtotal. Both amounts are retained. The difference is immaterial but is not silently corrected.

| Date | Gross surplus | Redeemed but unsettled | Final surplus |
|---|---|---|---|
| 15 Jul 2026 | USD 5,287,753 | USD 5,033,700 | USD 254,053 |
| 31 Jul 2026 | USD 4,338,562 | USD 3,946,174 | USD 392,388 |

## 4. FRGXX: identification, quality and liquidity

| Field | Identification |
|---|---|
| Name | Fidelity Investments Money Market Government Portfolio |
| Share class | Institutional Class |
| Ticker / CUSIP / Fund # | FRGXX / 31607A703 / 2642 |
| Registrant / Series | Fidelity Colchester Street Trust / S000004820 |
| Class ID | C000141704 |
| Framework | Government money market fund under Rule 2a-7 |
| Objective | High current income consistent with preservation of principal and liquidity |

| Date | Class net assets | NAV | WAM | WAL | USD1 position | Position / class |
|---|---|---|---|---|---|---|
| 31 May 2025 | USD 173.065bn | 1.0000 | 31 | 82 | USD 1.850bn | 1.07% |
| 30 Nov 2025 | USD 193.010bn | 1.0001 | 36 | 79 | USD 2.294bn | 1.19% |
| 30 Apr 2026 | USD 192.146bn | 0.9999 | 40 | 94 | USD 3.814bn | 1.99% |
| 31 Jul 2026 | USD 208.223bn | 0.9999 | 40 | 100 | USD 2.899bn | 1.39% |

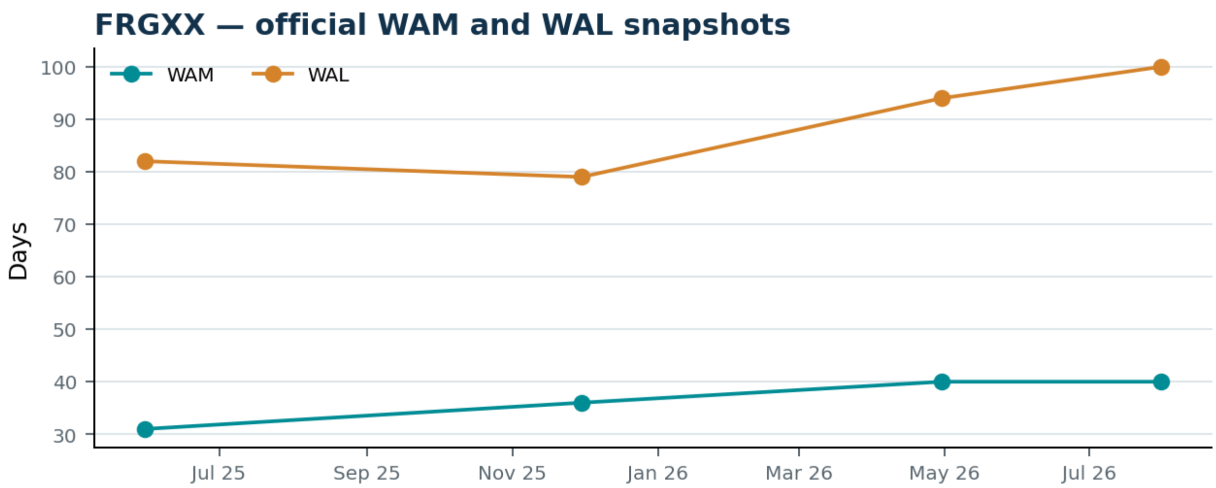


*Figure 4 — FRGXX official WAM and WAL observations. Latest official snapshot: 31 July 2026.*

**CALCULATION —** At 31 July, the USD1 reserve position represented approximately 1.39% of Institutional Class net assets and 1.07% of series net assets. Daily and weekly liquid assets were 59% and 72%, respectively. These ratios are favourable but do not guarantee same-day settlement to BitGo or its Clients.

## 5. Economic look-through — no double counting

The July Form N-MFP3 provides a more recent fund-level look-through. The denominator below is USD 275.400bn of gross securities. These securities and repo positions are legally held by the fund; the USD1 reserve directly holds FRGXX shares.

| Underlying category | Share of gross securities | Value |
|---|---|---|
| Treasury debt | 36.60% | USD 100.794bn |
| Agency coupon debt | 21.97% | USD 60.507bn |
| Treasury reverse repos | 18.67% | USD 51.425bn |
| Agency reverse repos | 15.37% | USD 42.340bn |
| Agency discount notes | 6.06% | USD 16.691bn |
| Other | 1.32% | USD 3.644bn |

**NO-DOUBLE-COUNTING RULE —** FRGXX shares are the direct reserve asset. Treasuries, agency securities, reverse repos and cash held by the fund are indirect economic exposures and must never be added to the FRGXX shares.

## 6. Bank deposits and counterparty risk

The reserve reports identify aggregated demand deposit and money market deposit accounts at regulated U.S. commercial banks, held in segregated accounts in BitGo's name for Clients. The named banks and bank-by-bank balances are not disclosed. Balances may exceed FDIC insurance limits. The July report separately shows a zero balance in the BitGo Bank & Trust Account and the stated amounts in Demand Deposit Accounts.

| Date | Cash / DDA | Share of reserves |
|---|---|---|
| 30 Jun 2026 | USD 1.179bn | 25.43% |
| 15 Jul 2026 | USD 1.151bn | 26.52% |
| 31 Jul 2026 | USD 1.101bn | 27.53% |

**CRITICAL LIMIT —** The banks are not named and the balances are not allocated by institution. Concentration, availability, unrecognised time-zone effects and a bank-failure scenario cannot be measured precisely.

## 7. Redemption rights, authorised Clients and Good Standing

| Holder category | Direct BitGo right | Practical route |
|---|---|---|
| Authorised BitGo Client | Conditional direct contractual right | Compliant request; payment to an approved bank account in the Client's name |

| | | |
|---|---|---|
| Holder without a BitGo account | No demonstrated direct access | Secondary transfer or sale, or use of an intermediary |
| Platform customer | Platform contractual rights only | Depends on the platform's agreement; BitGo does not guarantee the intermediary's obligations |
| Self-hosted wallet | Technical control of the token | No automatic direct fiat right |

### 7.1 Access conditions

- Registered BitGo Client with an active Account
- Eligible jurisdiction and lawful use of USD1
- Identity, beneficial ownership and requested documentation
- AML/CFT, sanctions, KYT and enhanced-review controls
- Approved bank account in the Client's name
- Operational compliance with network finality and platform requirements

### 7.2 Good Standing and discretion

Good Standing requires compliance with applicable law and incorporated terms, continued provision of information, absence of prohibited or high-risk status, and an active, unsuspended Account. BitGo may reject, hold or delay a request for compliance, sanctions, fraud, security, network-finality, insufficient-information, legal-order, payment-rail, liquidity or operational reasons.

**CONTRACTUAL FACT —** BitGo states a typical target of initiating transfers within two business days after a compliant request, using commercially reasonable efforts. This is not a service-level guarantee. Fees and limits are displayed through the platform and were not numerically determinable from the public sources reviewed.

## 8. Proof of Reserves and multichain architecture

The 6 August 2026 PoR snapshot showed USD 3.988693bn of reserves, USD 3.988299bn of aggregate supply and a ratio of approximately 100.01%. It is technical/on-chain/oracle information and not a KPMG attestation or continuous audit. On 30 August, the official dashboard displayed no determinable values ("loading / —"); the earlier snapshot is therefore retained without extrapolation.

| PoR field | Value |
|---|---|
| Reserves — 6 Aug 2026 | USD 3,988,693,135.91 |
| Aggregate supply | USD1 3,988,298,628.26 |
| Difference | USD 394,507.65 |
| Oracle | 0x691b74146cdba162449012aa32d3cbf5df77d4c4 |
| Block | 25,698,130 |
| Function | latestBundle() |
| 30 Aug refresh | Not determinable from available dashboard output |

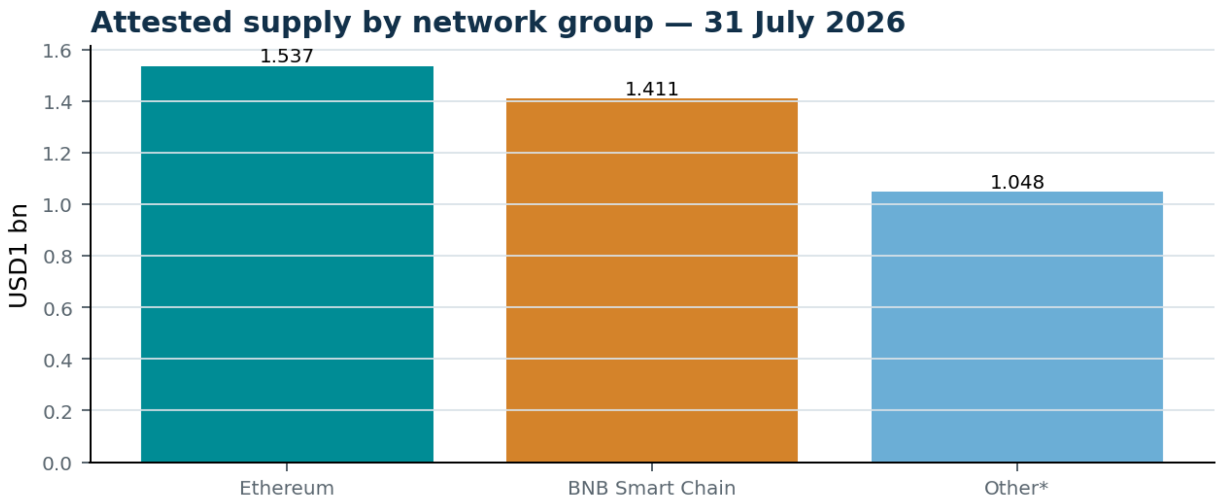


*Figure 5 — Attested supply by network group at 31 July 2026. "Other" comprises Tron, Solana, Aptos and Tempo.*

The July attestation explicitly groups Tron, Solana, Aptos and Tempo under "Other". The technical PoR documentation separately follows native and bridged representations across ten chains. The differing perimeters do not, by themselves, prove a quantity discrepancy; they require explicit reconciliation among native supply, bridged representations and attested aggregates.

| Layer | Principal risk |
|---|---|
| Native smart contract | Code defect, administrative privileges, pause, freeze, burn or address error |
| Blockchain finality | Reorganisation, congestion, confirmation thresholds or outage |
| Bridge / interoperability | Third-party bridge, wrapped representation or non-native asset risk |
| PoR oracle | Delay, off-chain source, aggregation, calculation or source-chain risk |
| Wallet / custodian | Loss of keys, policy, segregation and recovery |
| Exchange / intermediary | Insolvency, suspension, withdrawal limits and distinct contractual rights |

## 9. Risk matrix

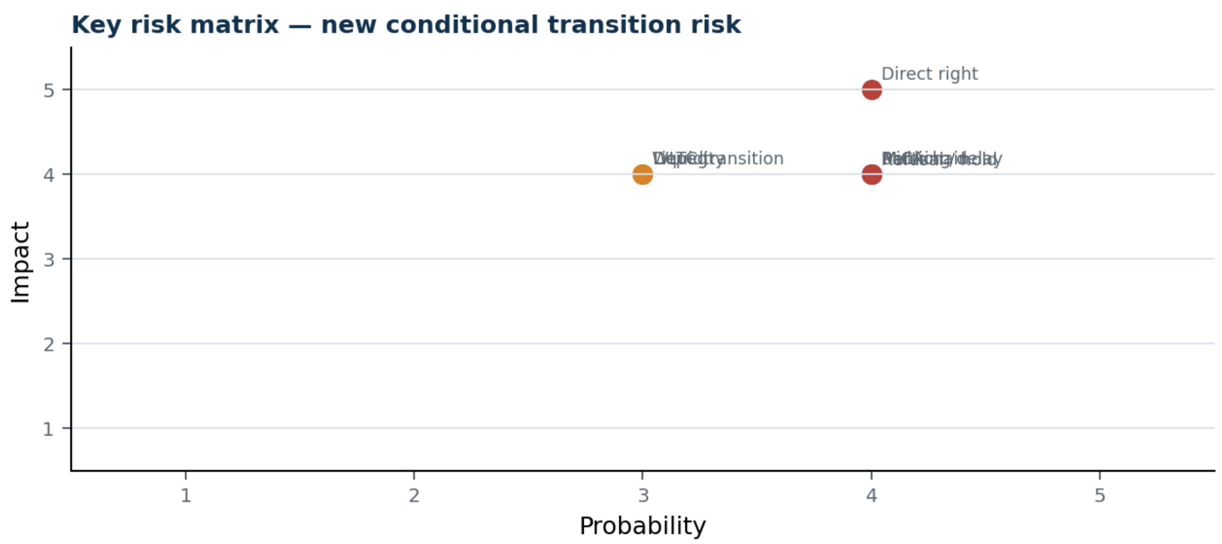

*Figure 6 — Updated principal risk matrix at end-August 2026.*

| Risk | Impact | Probability | Score | Recommended control |
|---|---|---|---|---|
| No direct right for a non-Client holder | 5 | 4 | 20 | Do not equate token ownership with redemption access |
| Refusal or suspension discretion | 4 | 4 | 16 | Pre-qualification and alternative exit procedures |
| Multichain / bridge / oracle | 4 | 4 | 16 | Contract whitelists and per-network exposure limits |
| Banking delay and cut-offs | 4 | 4 | 16 | Cash buffers and operational calendars |
| MiCA distribution qualification | 4 | 4 | 16 | Obtain jurisdiction-specific legal validation |
| Insolvency priority not demonstrated | 5 | 3 | 15 | Obtain legal analysis of ranking and segregation |
| Fund / bank liquidity | 4 | 3 | 12 | Maintain buffers and secondary exit routes |
| Conditional WLTC transition | 4 | 3 | 12 | Monitor OCC conditions, effective date and new terms |
| Secondary-market depeg | 4 | 3 | 12 | Exit thresholds and multiple venues |

## 10. Static stress tests

| Redemption demand | Amount | Covered by cash | FRGXX redemption required | % of FRGXX position |
|---|---|---|---|---|
| 5% | USD 199.8m | USD 199.8m | USD 0 | 0.00% |
| 10% | USD 399.7m | USD 399.7m | USD 0 | 0.00% |
| 25% | USD 999.1m | USD 999.1m | USD 0 | 0.00% |
| 50% | USD 1.998bn | USD 1.101bn | USD 896.8m | 30.93% |
| 100% | USD 3.997bn | USD 1.101bn | USD 2.895bn | 99.85% |

**INTERPRETATION —** At 31 July, aggregated cash statically covered approximately 27.6% of supply. A 50% redemption would theoretically require about USD 896.8m of FRGXX redemptions after cash. This does not demonstrate intraday availability, bank capacity, fund cut-offs, AML throughput or payment-rail execution.

| Horizon | Prudent reading | Missing data |
|---|---|---|
| Intraday | Only actually mobilisable cash; finality and cut-off risk | Cash by bank, capacity, operating hours and rail |
| 24 hours | Cash plus fund redemption if instructed before cut-off | Contractual liquidity and settlement time |
| 48 hours | Closer to BitGo’s contractual target for a compliant request | Weekends, manual reviews and correspondent banks |
| 5 days | Fund mobilisation and bank reallocation | Fund and counterparty behaviour under stress |
| 30 days | Orderly reduction possible if markets and infrastructure operate | Compensating issuance, adoption and legal constraints |

# 11. Accounting, audit and business implications

For a company, USD1 is a simultaneous exposure to the issuer, reserve assets, banks, the money market fund, contractual terms, blockchain, wallet or custodian, intermediaries, secondary liquidity and applicable regulation. Reserve quality alone is therefore insufficient.

| Question | Prudent implication |
|---|---|
| Cash or cash equivalent? | Price stability is insufficient; analyse convertibility, maturity, withdrawal access and treasury policy |
| Financial asset? | A direct contractual claim may be relevant for a Client; a non-Client holder may have only secondary-market access |
| Cryptoasset / intangible? | Possible under some frameworks and facts, particularly without a direct contractual claim against the issuer |
| Measurement | Cost, fair value or other treatment depends on the applicable framework, market liquidity, peg and restrictions |
| Credit / impairment risk | Assess issuer, banks, fund, custodian, intermediaries and execution capacity — not only reserve ratio |
| Presentation and disclosures | Document convertibility, restrictions, no deposit insurance and post-balance-sheet events |

## 11.1 Recommended audit procedures

- Confirm on-chain balances against official contracts and networks.
- Verify legal or beneficial ownership of wallets and key controls.
- Reconcile quantities to the ledger and custodian or exchange statements.
- Read the applicable contractual version and establish direct or indirect rights.
- Test an actual redemption or sale, including fees and timing.
- Test pricing, spreads and depeg events at the reporting date.
- Assess business continuity, bridge and oracle dependencies, and concentrations.
- Do not substitute the USD1 reserve report for confirmation of the company's own asset.

# 12. Regulatory update at 30 August 2026

| Authority / region | Text or event | Status | Implication |
|---|---|---|---|
| OCC | BitGo conversion to BitGo Bank & Trust, N.A. | Final / effective | National trust-bank supervision; USD1 remains non-FDIC-insured |
| OCC | Corporate Decision 1385 — World Liberty Trust Company, N.A. | Preliminary / conditional | Prospective transfer path; no effective issuer change at cut-off |
| U.S. Treasury | GENIUS Act Regulations NPRM — 18 Aug 2026 | Proposed rule | Comments through 19 Oct 2026; not a final rule |
| U.S. Congress | GENIUS Act, Public Law 119-27 | Enacted law | Federal framework with implementation and transition steps |
| European Union | Regulation (EU) 2023/1114 — MiCA | In force | EMT framework; no USD1 authorisation demonstrated |
| UEMOA | Official USD1 status | Not demonstrated | No specific official authorisation identified |
| CEMAC | Official USD1 status | Not demonstrated | No specific official authorisation identified |

No official source reviewed establishes that USD1 is specifically authorised for public offering, admission to trading or regulated distribution in the EU, UEMOA or CEMAC. This is not equivalent to concluding that USD1 is universally prohibited; jurisdiction-specific legal validation remains necessary.

# 13. Answers to the 26 final questions

| Question | Answer |
|---|---|
| 1. Legal issuer? | BitGo Technologies, LLC through 11 December 2025; BitGo Bank & Trust, N.A. from 12 December 2025. The proposed WLTC transition was not effective at cut-off. |
| 2. WLF role? | Brand, ecosystem, documentation, interfaces, distribution and integrations; no current direct redemption obligation demonstrated. |
| 3. Direct reserve assets? | Aggregated cash / Demand Deposit Accounts and FRGXX shares. No directly held Treasury bill or direct reverse repo was identified. |
| 4. Fund share? | 72.47% of redemption assets at 31 July 2026. |
| 5. Fund identity? | Fidelity Investments Money Market Government Portfolio — Institutional Class; FRGXX; CUSIP 31607A703. |
| 6. Fund quality? | High, based on Rule 2a-7 framework, stable NAV and official liquidity metrics, but not risk-free. |
| 7. Indirect holdings? | Treasury and agency debt, Treasury and agency reverse repos, and agency discount notes, legally held by the fund. |
| 8. USD1 concentration in fund? | Approximately 1.39% of Institutional Class assets and 1.07% of series assets at 31 July. |
| 9. Materiality of mass redemption? | Position is modest relative to fund assets and reported liquidity, but BitGo's intraday execution remains unproven. |
| 10. Reserve reconciliation? | Yes for 32 observations, subject to the isolated one-dollar printed discrepancy at 31 July. |
| 11. PoR reconciliation? | Not on identical dates and perimeters; 6 August reconciles internally, 30 August values were not determinable. |
| 12. Economically covered tokens? | Reports assert at least full point-in-time coverage of redeemable tokens; this does not guarantee price or permanent liquidity. |
| 13. Universal direct redemption? | No. Direct operational access requires an active qualifying BitGo Account in Good Standing. |
| 14. Client onboarding? | Eligible jurisdiction, KYC/KYB, AML/sanctions, documentation, risk assessment, active Account and approved bank account. |
| 15. Good Standing? | Legal and contractual compliance, continuing information, no prohibited/high-risk status and no suspension. |
| 16. Refusal or delay grounds? | Compliance, sanctions, fraud, security, finality, missing information, limits, legal orders, banking rails, outages or liquidity. |
| 17. Timing and fees? | Typical two-business-day initiation target, no SLA. Exact platform fees were not publicly determinable. |
| 18. Bank payment destination? | An approved bank account designated by and held in the Client's name. |
| 19. Non-BitGo holder? | No demonstrated direct route; secondary sale or transfer, or use of an intermediary. |
| 20. Platform customer rights? | Those in the platform agreement. BitGo does not guarantee the intermediary's obligations. |
| 21. Property interest in reserves? | No ownership or security interest in a specific reserve asset under current terms; the right is contractual. |
| 22. Insolvency ranking? | Exact current ranking is not demonstrated. Legal advice remains necessary. |
| 23. Differences by network or intermediary? | Finality, contract, bridge, fees, freeze, custody, insolvency and contractual rights vary. |
| 24. Risks outside the attestation? | Internal controls, fraud, cyber, bank concentration, AML throughput, bridges, oracles, off-balance-sheet commitments and governance. |
| 25. Corporate consequences? | Exposure limits, treasury buffers, documented accounting, independent confirmation, exit testing and continuity planning. |
| 26. Data needed for a dynamic model? | Timestamped flows, cash by bank, cut-offs, fees/limits, processing capacity, full fund portfolio, counterparties and secondary-market depth. |

# 14. Limitations, assumptions and conclusion

## 14.1 Limitations

- Depository banks and bank-by-bank balances are not identified.
- Reserve reports are point-in-time examinations of management's assertion, not general audits of BitGo/WLF, internal controls, smart contracts or individual rights.
- The PoR snapshot is dated differently from the monthly attestation and its 30 August refresh did not yield determinable figures.
- Exact fees, account limits, bank cut-offs and end-to-end processing capacity are not publicly established.

## 14.2 Assumptions

- "Cash and cash equivalents" is treated according to the reports' account descriptions, not as physical cash.
- CUSIP 31607A703 is a direct holding of FRGXX shares; fund holdings are indirect exposures and are not double counted.
- Observation dates prevail over report-title months and signature dates for chronological analysis.
- Timing adjustments are not invented when their components cannot be established.

## 14.3 Conclusion

At end-August 2026, USD1 displayed point-in-time accounting coverage above 100% at both July observation dates and a reserve composed of aggregated bank cash and high-quality FRGXX shares. The core conclusions remain unchanged: the examination is not a continuous audit; the fund look-through must not be double counted; and a holder without an active BitGo Account in Good Standing has no demonstrated direct redemption right. The proposed WLTC transition, the Treasury NPRM and divergent multichain perimeters increase legal, operational and governance risk, but do not, on the available evidence, justify changing the overall favourable but cautious view of reserve quality.

**BECTRA POSITION —** USD1 may be considered a digital settlement or treasury instrument only within a company framework that pre-validates the exit route, limits issuer and network concentrations, and preserves independent bank liquidity.

# Appendix A — Principal sources

**S01 — USD1 reserve reports, April 2025–July 2026.** Primary supplied documents

**S02 — BitGo Coin Minting & Redemption Services Terms.** Official source

**S03 — SEC Form N-MFP3 at 31 July 2026, accession 000003540226004807.** Official source

**S04 — OCC Corporate Decision 1385, 14 August 2026.** Official source

**S05 — U.S. Treasury, GENIUS Act Regulations NPRM, 18 August 2026.** Official source

**S06 — GENIUS Act, Public Law 119-27.** Official source

**S07 — Regulation (EU) 2023/1114 — MiCA.** Official source

**S08 — World Liberty Financial — USD1 Proof of Reserves.** Official source