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# The "Hamilton Blessing" of the 2025 GENIUS Act


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# The "Hamilton Blessing" of the 2025 GENIUS Act

by Neal J. Wilson

Virtually every American child is taught in school the brilliant foresight of "Hamilton's Blessing", the successful advocacy of Treasury Secretary Alexander Hamilton to have the young federal government in 1790 assume both the American Revolutionary War debt obligations of the original thirteen states as well as the debt obligations of the pre-Constitutional national government. As the lesson goes, the decision to assume these debt obligations – $11 million in market value collectively to the French Government and several Dutch bankers and more than $18 million in market value owed by the states to colonist bondholders[1] – achieved the shared vision of Hamilton, President George Washington and their fellow Federalists to make the new federal government financially preeminent over the individual states as the regulator of a singular currency and the master of interstate and foreign commerce. Although the new Constitution ratified a year earlier in 1789 did not explicitly contemplate the assumption of state or pre-Constitutional national debt, Hamilton's advocacy turned an ambiguity into a powerful reality.[2]

Hamilton's foresight was that the ability to issue debt is, perhaps next to military might, the most important of sovereign powers. He learned this valuable lesson as a young man serving in a trading house on the Dutch colonial island of St. Croix. Hamilton recognized that England's ability to impose its will over its domestic subjects and its naval supremacy over its European rivals ultimately stemmed from its ability to issue debt through the Bank of England, the world's first central bank.[3] Although England's ability to raise debt was not enough to tame its American colonies, it had enabled the Crown, just prior to the American uprising, to defeat its arch rival and more considerable foe, France, in the Seven Years' War. By the end of that War, England had a national debt of over £132 million with interest payments consuming over half of its government expenditure. By the end of the American Revolutionary War, England's debt had ballooned to a

[1] John Steele Gordon, "Hamilton's Blessing: The Extraordinary Life and Times of Our National Debt" (Walker & Co. 2020), pp. 11-12, 26.

[2] The Constitution did grant to the federal government the exclusive ability to "lay and collect Taxes, Duties, Imposts and Excises," Article I, Section 8, Clause 1, and "to borrow Money on the credit of the United States," Article 1 Section 8, Clause 2. This exclusive federal authority was put into motion by the enactment in July 1789 of the Tariff Act almost immediately after the ratification of the Constitution. Hamilton's debt assumption plan rested on the tariff revenues imposed on imports as contemplated by the Tariff Act; such tariff revenues remained the federal government's primary revenue source until World War I. See Gordon, p. 21.

[3] Coincidentally, the Bank of England was created in 1694 in the aftermath of the 1688 "Glorious Revolution" in order to permit the Parliament-driven government of King William III and Queen Mary II to issue "perpetual funded debt" to pursue war against France and other policy objectives.

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dangerously high £250 million, representing 140% of its GDP.[4] Both the Revolutionary War, and America's victory in it, were in many respects the result of England's huge debt overhang!

Federal Debt Undergirds The Dollar's "Exorbitant Privilege"

As with all pivotal inflection points in history, the road to debt assumption was not a smooth or uncontroversial one. Crucially for posterity, Hamilton insisted that current holders of state and old national government debt, including foreigners, should be paid at par. At the time of his proposal, old national debt was trading between 20-25% of par.[5] Any effort to reward original holders, many of whom were Revolutionary War veterans, and punish current speculators, he argued, would be "ruinous to public credit".[6] Although the sincerely lodged arguments in favor of protecting those that had sold bonds at a discount had underlying moral merit and broadly reflected the sentiments of many Americans in the wake of the War, such concerns were subsumed by the fundamental significance of the act of debt assumption itself. The arguments for how to reimburse selling bondholders were rooted in financial naivete and raw emotion; they were arguments that failed to recognize the systemic sea change Hamilton's proposal enabled.

Hamilton insisted that the face value of the outstanding bonds be honored because fundamentally the federal government had to have the *current* credibility to issue more debt *in the future*. He understood that a promise to pay back a bondholder in full was sacrosanct because the credibility of the sovereign as borrower was to be the linchpin of the federal hegemonic system he envisioned.

From a long glidepath of history perspective, "Hamilton's Blessing" is aptly named. With it, the United States wields the valuable optionality, and some would argue "the exorbitant privilege,"[7] of issuing dollar denominated debt backed by federal taxing authority. That privilege has been exercised to conduct war, to flex military might, to respond to financial crises and pandemics, fund welfare and social programs, and indirectly, to sanction enemies. Today, the

[4] See Jan Eloranta and Jeremy Land, "Hollow Victory? Britain's Public Debt and the Seven Years' War" (Essays in Economic & Business History Vol. XXIX 2011), p. 211.

[5] Gordon, p. 23. James Madison had counter-proposed that the selling original bondholders be made whole by the amount of the discount and that existing holders be paid the market rate below par. The impracticality of Madison and others' proposed solutions eventually surrendered to reason. See also Ron Chernow, "Alexander Hamilton" (Penguin Press 2004), pp. 297-98, providing a chronicle of this fascinating debate and noting that old national debt traded as low as 15% of par.

[6] Chernow, p. 298.

[7] The term was coined by French finance minister and later French President, Valery Giscard d'Estaing, in the 1960s. D'Estaing's term was not one of endearment as he viewed America's "privilege" as a burden borne by Europeans and the rest of the world. See Kenneth Rogoff, "Our Dollar, Your Problem" (Yale University Press 2025), p. 212.

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United States has exploited that privilege to become the most prolific issuer of debt in history by any every measure. At $36 trillion at the end of 2024, U.S. gross debt exceeds the combined debt of all other large, advanced economies (most notably, the Eurozone, Japan, the United Kingdom and Canada).[8] Although the optionality and ready ability to issue debt can be misused (as the English proved in their 18th century extended military conflicts), there is little doubt that America's global financial preeminence rests on it.

The Broader Debate Over How to Regulate Digital Assets Misses the "Blessing" of Strictly Regulated Payment Stablecoins

In many ways, the current build-up to the regulation of digital assets echoes the debate over whether to assume state and old national debt in Hamilton's time. Like the emotionally charged issues of how to mechanically pay off outstanding Revolutionary War debts, most of the public and media conversation today centers around digital asset issues that ultimately will have little long-term impact on American economic power, even if they seem critically important now to certain investor constituencies. The first set of issues that fall into this category revolve around non-fiat backed digital assets generated by decentralized protocols and maintained by independent networks (e.g., Bitcoin, Ethereum, Solana). How should the federal government regulate the issuance and secondary market trading of such digital assets and their future progeny? How should the federal government police sales practices of private digital assets? How should the federal government craft custody rules for owning and holding private digital assets? To what extent should the federal government be able to access the blockchain transactions underlying private digital assets? The much-discussed "Clarity Act" that attempts to address many of these issues has stalled in Congress. If the Democrats assume control of the House of Representatives in the 2026 midterms, these issues will most likely not be resolved in a lasting fashion through legislation, but rather through executive branch regulations and enforcement actions that can change direction with each new administration.[9]

A second issue much discussed regarding digital assets that will have neither short-term nor long-term impact revolves around whether the federal government should issue its own sovereign digital currency through its central bank, the Federal Reserve (the "Fed"). The wisdom of such a sovereign digital currency, or central bank digital currency ("CBDCs"), is important to consider, but given the privacy concerns CBDCs raise – every transaction is recorded on a government-controlled blockchain ledger – it is highly unlikely that the Fed will be empowered

[8] Rogoff, p. 266.

[9] See Jill R. Shah and Nikou Asgari, "Digital Asset Groups Turn Against U.S. Bill that its Lobbyists Had Been Pushing" (Financial Times Jan 20, 2026).

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by Congress to issue its own digital currency, even if other central banks around the globe do. It is perhaps instructive to note that the CBDCs to date that can be purchased by the public have been issued by the central banks of the Bahamas, Nigeria, Jamaica, and Zimbabwe. Also noteworthy are the countries that are reportedly close to going live with CBDCs: China, Russia, and India. The prospect of a Fed-backed CBDC being issued any time soon is remote; indeed, President Trump recently signed an Executive Order that prohibits the development, and even the promotion, of a CBDC.[10]

The Singular Importance of Payment Stablecoins

The digital asset debate that likely *will* affect the long-term hegemonic significance of the U.S. financial system concerns payment stablecoins. Payment stablecoins operate on decentralized blockchains, ensuring financial privacy without excessive government control. Payment stablecoins are issued by private sector institutions and permit the transfer of money on a peer-to-peer basis on blockchains. They enable faster, lower-cost transactions and reduce remittance fees.[11]

In "first-generation" digital payments, a trusted centralized communication system – SWIFT or ACH[12] – is used to initiate the movement of money that must ultimately be settled on a centralized ledger (i.e., the internal ledgers of each of the sender's and recipient's banks must be updated for corrections and changes). In "second-generation" digital payments, a decentralized communication system – PayPal, Venmo, Zelle, and more recently FedNow – is used to initiate the movement of money between fellow users, but the actual digital movement still goes through the legacy centralized system of SWIFT or ACH and the centralized ledgers of the sender's and recipient's banks. Payment stablecoins, by contrast, have both a decentralized communication system and a decentralized ledger system with virtually no settlement process. Digital money movements are essentially instantaneous and reflected as such in the account balances of the sender and the recipient. Stablecoins thus represent a "third generation" digital payment in that trusted third-party institutions are replaced by a trusted decentralized consensus mechanism in the form of blockchain.[13]

[10] Executive Order 14,178 (Jan 23, 2025).

[11] One can also argue that they provide the unbanked access to the digital economy.

[12] SWIFT is the acronym for Society of Worldwide International Financial Telecommunications and ACH is the acronym for Automated Clearing House.

[13] See generally Heath P. Tarbert, "The Dollar's Digital Future," paper presented at The University of Pennsylvania Wharton School of Business Program, The Future of Finance (January 15, 2026), pp. 3-15.

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Before discussing the GENIUS Act (formally the "Guiding and Establishing National Innovation for U.S. Stablecoins Act") in more detail, it is important to distinguish payment stablecoins from another third-generation digital payment system, tokenized deposits.[14] Tokenized deposits deploy blockchain technology within private networks operated by banks. These digital deposits act like conventional privately issued commercial bank deposits in that they are non-physical money that can be transmitted between bank accounts to pay third parties for goods and services. Unlike conventional commercial bank deposits, which rely on centralized communication systems between bank institutions, tokenized deposits can operate on a 24/7 basis because they operate on a blockchain and therefore offer near-instant settlement between senders and recipients within the network. Several banks are already facilitating tokenized deposits on permissioned networks they control. J.P. Morgan's Kinexys platform processes more than $2 billion per day on its private network.[15] In 2025, JPM launched a token (JPMD) for its institutional tokenized depositors on a permissioned network. Citi also offers a tokenized deposit for its institutional clients. Two smaller institutions, Vantage Bank and Custodia, announced a tokenized deposit network open to any bank, credit union or fintech, enabling interoperable, on-chain representations of insured deposits.[16] Some have argued that tokenized deposits could exacerbate bank runs because of speed of money movements and because they are not backed by liquid fiat assets such as U.S. Treasuries.[17] Others have argued that tokenized deposit networks favor large banks over smaller banks because their depositor networks are considerably larger and because they can better bear the technology costs to initiate and maintain them. Regardless of these concerns, tokenized deposits will continue to be adopted and issued by banks and will be regulated as unsecured liabilities of the bank, just as traditional deposits.

## The GENIUS Act Reaffirms the Exorbitant Privilege of the USD

A fundamental difference between payment stablecoins and tokenized deposits is the collateral which underlies them.[18] This difference underlies why payment stablecoins will have a

[14] CBDCs are also a third-generation digital payment system.

[15] *Introducing Kinexys*, J.P. Morgan Insights (reporting average daily transaction volume exceeding $2 billion).

[16] Custodia Bank and Vantage Bank press release*, Vantage Bank and Custodia Announce Launch of Tokenized Deposits for U.S. Banks (Oct. 23, 2025).*

[17] See Tarbert, p. 13.

[18] Payment stablecoins are separate and distinct from: (1) multi-asset backed stablecoins, which are backed by commodities or foreign currencies; (2) algorithmic stablecoins, which constantly rebalance collateral to maintain in theory a value equal to a 1:1 peg to the dollar; and (3) digital asset-backed stablecoins, which are backed by Bitcoin, Ether or another digital currency. These other types of stablecoins have proven not to be particularly or reliably stable,

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long-term impact on America's financial hegemonic strength. Tokenized deposits are simply an on-chain representation of bank deposits.[19] As such, tokenized deposits, like first-generation commercial bank deposits, are moved at the direction and whim of the individual depositor and, in extreme situations, can be susceptible to bank runs.[20] By contrast, upon implementation of the GENIUS Act, payment stablecoins will be backed (at least those issued and used in the U.S.) primarily by one of the most liquid assets in the world: U.S. Treasuries. Approximately $1 trillion of U.S. Treasuries are traded daily and they are widely held.[21] Americans, including U.S. institutions and the Fed, hold approximately $20 trillion worth of U.S. Treasuries. Foreign central banks hold another approximate $7 trillion of U.S. Treasuries, and this figure rises to close to $9 trillion if holdings of foreign institutions such as sovereign wealth funds are included. The liquidity and soundness (at least up to now) of a U.S. Treasury market of $29 trillion is the reason that 60% of central bank reserves in the world are held in U.S. Treasuries even though America represents only 25% of world's GDP.[22]

The GENIUS Act (the "Act") inexorably links payment stablecoins to U.S. Treasuries, and by natural corollary, to the dollar. President Trump signed the Act on July 18, 2025 after its passage in the House and Senate with broad bipartisan support. The Act is the first federal statute to directly regulate the digital asset market and provides a comprehensive regulatory framework for payment stablecoins.[23] The Act does not regulate tokenized deposits (they are covered by existing regulations governing bank deposits), CBDCs issued by other countries, or digital assets. The Act will take effect the earlier of 18 months after its enactment (i.e., January 2027) or 120 days after

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as the Terra-Luna crisis in May 2022 demonstrated as its dollar peg to the UST stablecoin broke and a run on the algorithmic coin ensued.

[19] Just like traditional commercial bank deposits, tokenized deposits will not be insured by the FDIC if the account exceeds a value of $250,000.

[20] Lev Menand, "The Fed Unbound: Central Banking in a Time of Crisis" (Columbia Global Reports 2022), p. 101. "The presence of the Fed's Discount Window [created in 1913] – combined with deposit insurance, which Congress created in 1933 – has practically eliminated traditional banking runs as a source of monetary contraction."

[21] The advantageous of having a liquid and deep market in U.S. Treasuries cannot be over-emphasized. For instance, the Bank of England's November 2025 proposal for implementing sterling-denominated stablecoins recognizes that the U.K. sovereign gilt market "may not support large demand and activity by systemic stablecoin issuers" and thus only allows up to 60% of their backing assets in short-term sterling denominated UK government debt. See Bank of England, Proposed Regulatory Regime for Sterling-Denominated Systemic Stablecoins (consultation paper, November 10, 2025).

[22] Rogoff, p. 211.

[23] Debevoise & Plimpton, "GENIUS Act Signed into Law, Establishing First Federal Stablecoin Framework" (July 21, 2025).

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implementing regulation are promulgated by the relevant federal regulators. On the back of the GENIUS Act passage, Standard Chartered Bank predicted that $2 trillion of payment stablecoins will be issued by the end of 2028; in November 2025, Treasury Secretary Scott Bessent increased that prediction to $3 trillion.[24]

The key dictate of the Act is that payment stablecoins must be backed 1:1 by cash, deposits, and/or U.S. Treasuries with maturities less than 93 days. This requirement will promote and expand the purchase of Treasuries, which will have the effect of increasing Treasury prices and concomitantly reducing their yield, or cost of borrowing to the federal government. The two largest stablecoin issuers, Tether (USDT) and Circle (USDC), do not currently have products that comply with this 1:1 requirement, but peg their stablecoins' value to the dollar. Both have recently announced plans to issue U.S. based stablecoins that will be fully compliant with the GENIUS Act.[25] JP Morgan, Citi and Bank of America have also each announced plans to explore the issuance of in-house payment stablecoins. According to their most recent filings, Tether and Circle currently hold either directly or indirectly through repurchase agreements a combined total of approximately $160 billion of U.S. Treasuries. These combined holdings are more than the countries of Germany, Saudia Arabia, and Spain. Tether, which trades on a daily basis more than Bitcoin, is considered a foreign issuer and therefore its stablecoins can only be held by U.S. citizens if purchased through regulated intermediaries; Circle is a U.S. issuer that operates within state money-transmitter approvals. Today, a U.S. citizen can purchase USDT and USDC most easily through a fiat on-ramp such as MoonPay, Transak and BitPay, that are regulated exchanges (or dealers) with "Know Your Customer" rules. These fiat on-ramps allow the purchase through bank transfer, debit/credit cards, ApplePay and GooglePay, all of which operate on first-generation money payment systems. Significantly, USDT and USDC sit on the self-custodied wallets of purchasers.

Understanding how Tether and Circle operate within the existing regulatory framework demonstrates the need and the promise of the new regulatory regime the GENIUS Act introduces. The GENIUS Act mandates three basic requirements designed to instill integrity and prevent instability: (1) strong anti-money laundering provisions; (2) counter-terrorism financing compliance; and (3) clear consumer protections.[26] All of these requirements are more stringent than the environment in which USDT and USDC currently operate. This means that dollar-linked

[24] See Niall Ferguson and Manny Rincon-Cruz, "Stablecoins are the Future, But Banks Will Survive" (Bloomberg Jan. 26, 2026).

[25] Tiffany J. Smith et al., "*What the GENIUS Act Means for Payment Stablecoin Issuers, Banks, and Custodians*," *WilmerHale Client Alert*, July 18, 2025.

[26] See Tarbert, p. 3; Debevoise & Plimpton.

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stablecoins can provide a realistic, broad-based alternative to bank debit accounts and credit cards as a payment mechanism. The key is that the regulator can easily identify the underlying holder at all times, which is certainly not the case with USDT and USDC holders today.[27] Payment stablecoins as envisioned by the GENIUS Act invite "multiple private dollar-linked stablecoins that create an ecosystem where competition and innovation can thrive".[28] This invitation is starting to be met by the market, as Tempo, a stablecoin blockchain designed for payments incubated by Stripe, and Stable and Plasma, two USDT centric stablecoin issuers, have recently raised impressive rounds of capital.[29]

Payment Stablecoins Should Complement Bank Deposits, Not Disintermediate Them

So how does the banking system address the GENIUS Act and the expected onslaught of new payment stablecoins? The answer is that banks must and will embrace them, becoming natural adopters over time. Critically important is the fact that the GENIUS Act prohibits the payment of interest on payment stablecoins. This means that banks, which can pay interest on deposits, can link tokenized deposits with payment stablecoins.

Under the Act, the interest being paid on U.S. Treasuries must inure to the benefit of the stablecoin issuer, thus representing a financial incentive for and benefit to banks to engineer the link of new payment stablecoins to deposit accounts.[30] With blockchain technology, smart contracts can be programmed to allow the conditional and reliable flow of digital money from interest-bearing deposit accounts to payment stablecoins as needed (operating just like bill pay technology features). This potential, but logical, symbiotic relationship between interest-bearing depository accounts and payment stablecoins is a natural for banks. The recent Capital One purchase of Brex suggests that banks understand the need to link relationship banking and innovative technology. Second, the AML requirements of the GENIUS Act make the banking system the natural adopter of payment stablecoins through linkage to tokenized deposits as they have the culture to conduct AML. Third, the custody rules imposed by the GENIUS Act require

[27] See Rogoff, pp. 196-98.

[28] Id. at 197.

[29] See Ferguson.

[30] This is one of the issues clouding the debate over the Clarity Act as non-bank crypto exchanges want to be able to pay "awards" to stablecoin holders. Without legislative intervention, the payment of "awards" may legally convert stablecoins into securities regulated by the U.S. Securities and Exchange Commission. Banks are obviously lobbying heavily to prevent such a securities definition carve-out. Even if crypto exchanges can pay "awards" on stablecoins without being considered securities, the ability to effectively pay "interest"/ "awards" alone does not mean that stablecoin exchanges will trigger a stampede of deposit monies to them, especially when there is legislative uncertainty.

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that only regulated entities can provide custody of payment stablecoins. Permitted custodians include banking institutions and those the primary regulator of which is a federal financial regulator (e.g., SEC and CFTC) or a state bank/credit union supervisory body. In practice, banking institutions have the existing infrastructure and culture to provide custody services.[31] Finally, the GENIUS Act clarifies that regulators cannot force banking institutions to treat custodied payment stablecoins as on-balance-sheet liabilities, nor require extra capital except as needed for operational risk of custody.[32] This means that banks are not penalized from a regulatory perspective to become adopters and/or custodians of payment stablecoins.

The risks of payment stablecoins to the banking system, however, are not inconsequential in theory. If non-bank stablecoins become sufficiently pervasive and convenient, bank deposits could flee and thereby risk disintermediating the banking system as deposits needed to make loans dry up. The rapid development of tokenized deposits by banks, however, suggests otherwise as banks adeptly operate in one of the most highly regulated industries in the U.S. economy. Although smaller banks may have more acute challenges as they lack the capital of large banks to develop or adopt new technologies, they will likely address this shortcoming by working within payment stablecoin consortiums (perhaps accomplishing linkage through tokenized deposit consortiums), as we have seen with European banks seeking to pool resources to utilize stablecoins under the European Union's MiCA regime.[33] Smaller banks could also enter into relationships with non-bank payment stablecoin technology facilitators or issuers as well as larger issuing banks, much as they do in other areas in which larger banks see the benefits of working with institutions with deep ties at the community level.

The risk to banks, often expressed by banks themselves, may also be overstated. The American Banker Association has posited that if stablecoins increase to $2 trillion in assets as predicted by Standard Chartered, this will result in a 10% decline in deposits. The Hoover Institute Professor Niall Ferguson, however, recently argued that banks will not be disintermediated by payment stablecoins in large measure because deposits earn interest. He noted that prior to 1935, a similar threat to banks emerged when individual banks were allowed to issue bank notes backed by U.S. Treasuries. Although the bank notes acted like money in that they were fairly liquid and backed by fiat collateral, bank deposits won out after an initial adoption of bank notes because the

[31] It should be noted that the OCC (the Office of the Comptroller of the Currency) in December 2025 approved national trust bank charters for five digital asset firms—Circle, Ripple, Paxos, BitGo, and Fidelity Digital Assets.

[32] See Smith, *WilmerHale Client Alert*.

[33] The consortium, consisting of eleven European Banks (including ING, UniCredit, BNP Paribas) plans to launch in the second half of 2026 a Euro-denominated payment stablecoin called Qivalis. It will include the ability to have programmable conditional payments.

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bank notes did not pay interest. Moreover, Ferguson argues that many depositors already accept much lower deposit rates that they could otherwise receive from competitor banks because they receive other valuable bank-bundled services that meet business and individual needs. He favorably quotes financial historian Barry Eichengreen on this point: "banks offer a comprehensive range of services beyond mere payment facilitation — including FDIC-backed deposits and preferential mortgage treatment for longstanding customers — that stablecoin issuers cannot easily replicate."[34] Ferguson notes that industry experts estimate that 70-80% of bank customers are deposit rate insensitive because relationship banking is about services, FDIC insurance and the Fed serving as lender of last resort. Finally, Ferguson persuasively observes that deposits are primarily driven by credit creation (i.e., the issuing of a loan credited to a borrower's bank account), while stablecoins are driven by trading on centralized and decentralized crypto exchanges. In this way, stablecoins (at least currently) serve more as complements, not substitutes, for depository accounts: "[B]oth deposits and stablecoins have increased and decreased more or less in tandem since 2018 — when Circle's USDC launched — with a high correlation coefficient of 0.87. Bank deposits have increased by over $6 trillion, while stablecoins have increased by about $280 billion."[35]

The final point to make about the banking industry is that the centrality of its regulated status provides a significant advantage in the wake of the GENIUS Act. Combined with the bank industry's powerful network effects, one can credibly posit that the banking system will adopt and subsume the new stablecoin technology, rather than be displaced by it.

## Conclusion

The GENIUS Act is an admirable and bipartisan legislative response to President Trump's Executive Order 14,178 issued in January 2025.[36] The Executive Order called for the "development of dollar-backed stablecoins to maintain USD global preeminence" for the express purpose of "promoting and protecting the sovereignty of the United States dollar".[37] Although the implementing rules and regulations have yet be promulgated by Treasury and other federal financial regulators, the Act accomplishes the objectives of placing regulation and supervision of payment stablecoins at the federal level and does so in a way that should complement and not

[34] See Ferguson.

[35] Id.

[36] As noted above, the European Union has enacted the MiCA (Markets in Crypto-Assets) legislation which includes provisions governing stablecoins. See generally Isabelle Mateos Y Lago, "The Digital Euro that Europe Urgently Needs" (Financial Times Jan. 7, 2026), arguing that the issuance of a euro-based CBDC "would ensure that the euro doesn't fall irretrievably behind the dollar in global digital ledger finance".

[37] Executive Order 14,178.

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undermine the existing banking industry. As the Tether and Circle ownership of U.S. Treasuries clearly demonstrates, the GENIUS Act also promises to meaningfully increase demand for federal government debt. In this way, the bipartisan policy decision in July 2025 to enact the GENIUS Act will tremendously strengthen the dollar and thereby maintain the status of the United States as the dominant financial player in the global market. This decision may eventually be viewed as a brilliant extension of "Hamilton's Blessing."

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