BECTRA

USD1

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

Period: 22 April 2025 – 30 June 2026
Legal and regulatory update: 6 August 2026

Monthly reports	15
Observations	30
Auditors	Crowe LLP, then KPMG LLP
Fund	FRGXX — CUSIP 31607A703

Analytical report — facts, calculations, interpretations and limitations distinguished

Executive summary

KEY CONCLUSION — All 30 observations reconcile arithmetically: at each date, reported redemption assets are at least equal to redeemable tokens. As of 30 June 2026, assets were $4.635bn versus $4.634bn of tokens, implying gross coverage of 100.0038% and a published surplus of $176,579. This margin is too small to be treated as loss-absorbing capital.

USD1 expanded rapidly: redeemable supply rose from $128.0m on 22 April 2025 to $4.634bn on 30 June 2026, a 36.2-fold increase. The peak in the corpus was $5.145bn on 17 February 2026; end-June supply was 9.9% below that peak.

The direct reserves observed comprise cash and cash equivalents and shares of the Fidelity Investments Money Market Government Portfolio — Institutional Class (FRGXX, CUSIP 31607A703). No directly held Treasury bill outside the fund, and no direct reverse repo, is identified. As of 30 June 2026, the fund represents 74.57% of assets and cash 25.43%.

The fund's securities — Treasuries, agency debt and reverse repos — are legally held by the fund. They provide an economic look-through, not assets directly held by BitGo for each USD1 holder. They are therefore never added to the value of the FRGXX shares in the coverage calculation.

The fund's quality is high given its Rule 2a-7 government money market fund status, NAV close to USD 1, WAM/WAL metrics and liquidity. This quality does not, however, guarantee principal, the absence of delays, or a NAV that always remains at USD 1. The shares are not FDIC-insured.

The most important legal point is the distinction between an economically backed token and a holder's personal redemption right. Direct mint/redeem rights are reserved for registered BitGo Clients with an active Account and in Good Standing. A holder without a BitGo account normally depends on a secondary sale or transfer, or on the rights granted by its intermediary.

World Liberty Financial controls the brand and organizes the ecosystem, distribution, interfaces, documentation and third-party integrations. The supplied documents state that WLF does not process mint requests: that function belongs to BitGo. Dolomite, Chainlink and Uniswap remain third parties, with their own risks and conditions.

The Proof of Reserves snapshot of 6 August 2026 showed $3.9887bn of reserves, 3.9883bn USD1 of supply and a 100.01% ratio. This snapshot complements the attestations but is neither a continuous audit nor proof of individual rights. Its own disclaimer states that data accuracy is not guaranteed.

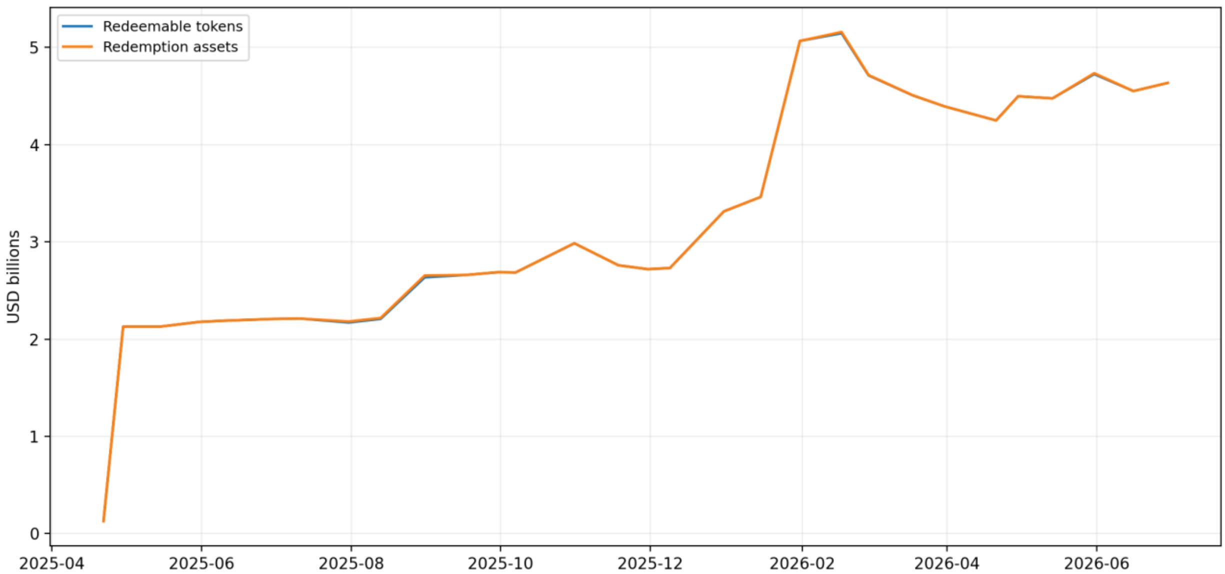

Figure 1 — Trend in redeemable tokens and redemption assets. Sources: USD1 reports, Notes A-C.

Practical decisions for a company

Topic	Prudent position
Treasury	Treat USD1 as an exposure to BitGo + reserves + networks + intermediaries, not as a bank deposit.
Liquidity	Do not assume intraday redemption; maintain a bank-cash reserve and multiple exit routes.
Contractual	Verify BitGo eligibility, the bank account in the Client's name, displayed fees and limits before acquisition.
Accounting	Document rights, use, restrictions and conversion risk; classification depends on the accounting framework and facts.
Audit	Retain attestations, applicable contracts, PoR snapshots and on-chain reconciliations; do not present the examination as a full audit.
Continuity	Limit concentration by chain, wallet, bridge, exchange, bank and fund; test weekends and manual AML controls.

1. Scope, methodology and evidence hierarchy

The corpus comprises 15 monthly reports covering April 2025 through June 2026, each with two observation dates, together with 27 additional official documents captured from World Liberty Financial websites and legal, technical and Proof of Reserves data. The complete inventory, page counts and SHA-256 hashes are provided in the Excel workbook.

METHODOLOGY — A separate row was created for each observation date. Measurement, signature, publication/capture and contract effective dates are kept separate. Explicitly reported dashes are distinguished from missing information.

Level	Evidence	Use
1	Reserve reports, Notes A-C and examination report	Amounts, entity, criteria, assurance and limitations
2	Applicable BitGo terms	Direct rights, Good Standing, process, timing, fees and discretion
3	SEC/Fidelity data	Identification, NAV, net assets, WAM, WAL, liquidity and fund look-through
4	On-chain / oracle data	Supply checks, contracts and PoR at a given date
5	WLF documentation	Brand role, interfaces, networks, third-party services and risks
6	Official OCC, Congress, SEC and EU texts	Status and regulatory update

1.1 Nature of the assurance

Crowe LLP, followed by KPMG LLP for June 2026, performed an examination under AICPA attestation standards and expressed a reasonable-assurance opinion on management's assertion. The engagement is not an audit of BitGo's or WLF's financial statements, an audit of the fund, an audit of smart contracts, continuous monitoring of reserves, or assurance over each holder's individual rights.

DOCUMENTARY LIMITATION — The Summary in several reports is explicitly stated as not subject to the independent accountant's report. Conclusions are therefore tied to Notes A-C and management's assertion, not only to the summary table.

2. Document review

Indicator	Result
Files analyzed	43 files received: 42 PDFs and 1 text prompt
Reserve reports	15
Observation dates	30
Exact duplicates	No exact duplicate detected by SHA-256
Silently replaced versions	None demonstrated in the batch
Auditor	Crowe LLP through May 2026; KPMG LLP in June 2026

Indicator	Result
Major legal change	Conversion to BitGo Bank & Trust, N.A. effective 12 December 2025
Document anomalies	10 anomalies/watchpoints recorded

3. Entity map and legal timeline

Entity	Demonstrated role	Watchpoint
BitGo Technologies, LLC	Historical issuer and mint/redeem operator through 11/12/2025	Do not apply the OCC charter retroactively to earlier dates.
BitGo Bank & Trust, N.A.	Issuer from 12/12/2025; national trust bank supervised by the OCC	USD1 tokens are not bank deposits and are not FDIC-insured.
World Liberty Financial / SC Financial Technologies	Brand control and ecosystem	The brand does not transfer the issuer's legal obligations.
World Liberty Financial LLC	Interface, documentation and access to third-party services	WLF states that it does not process mint requests.
Fidelity / FRGXX fund	Fund management and reserve asset	The underlying assets belong to the fund.
Crowe / KPMG	Independent accountants	Opinion limited to the assertion examined.
Chainlink / Dolomite / Uniswap	Third-party oracle, bridge, lending/borrowing and trading	Services not legally controlled as WLF obligations.

3.1 Issuer timeline

Period	Issuer / responsible entity	Evidence
22/04/2025–11/12/2025	BitGo Technologies, LLC	April–November 2025 reports and 9 December 2025 observation
From 12/12/2025	BitGo Bank & Trust, N.A.	OCC: conversion approved and effective; 31 December observation and 2026 reports

REGULATORY FACT — The OCC states that the conversion of BitGo Trust Company, Inc. into BitGo Bank & Trust, N.A., charter no. 25366, was approved and consummated on 12 December 2025 [S04].

4. Reserve composition, trend and coverage

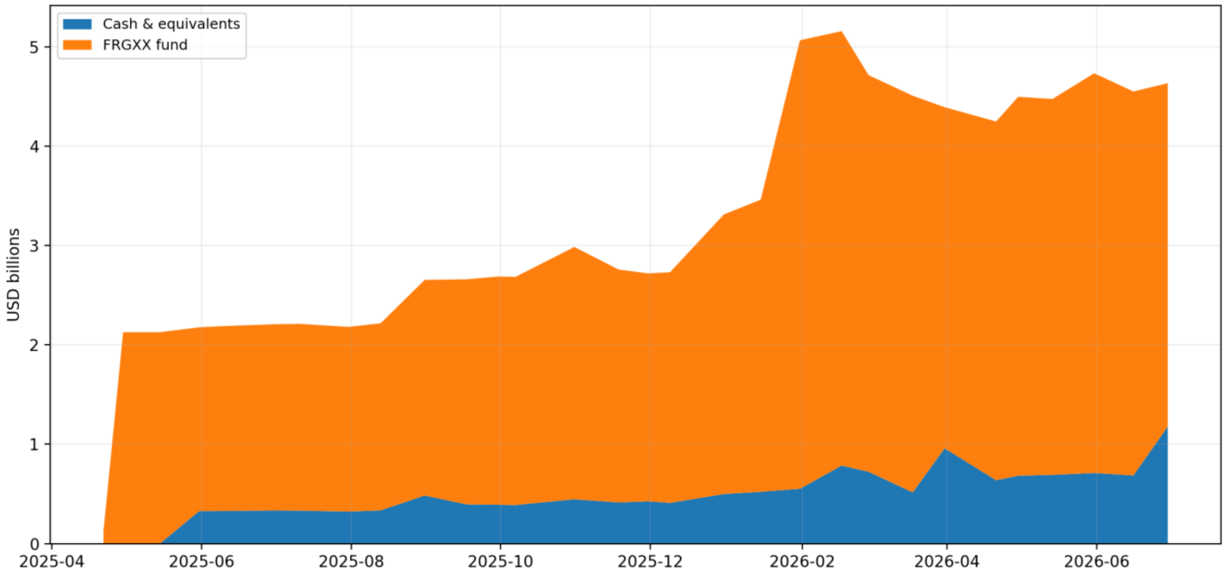

Figure 2 — Direct composition of redemption assets: cash and FRGXX shares.

As of 30 June 2026, redemption assets consisted of $1.179bn of cash and cash equivalents (25.43%) and $3.456bn of FRGXX shares (74.57%). On 22 April 2025, the fund represented virtually the entire reserve; the cash share reaches its corpus high on 30 June 2026.

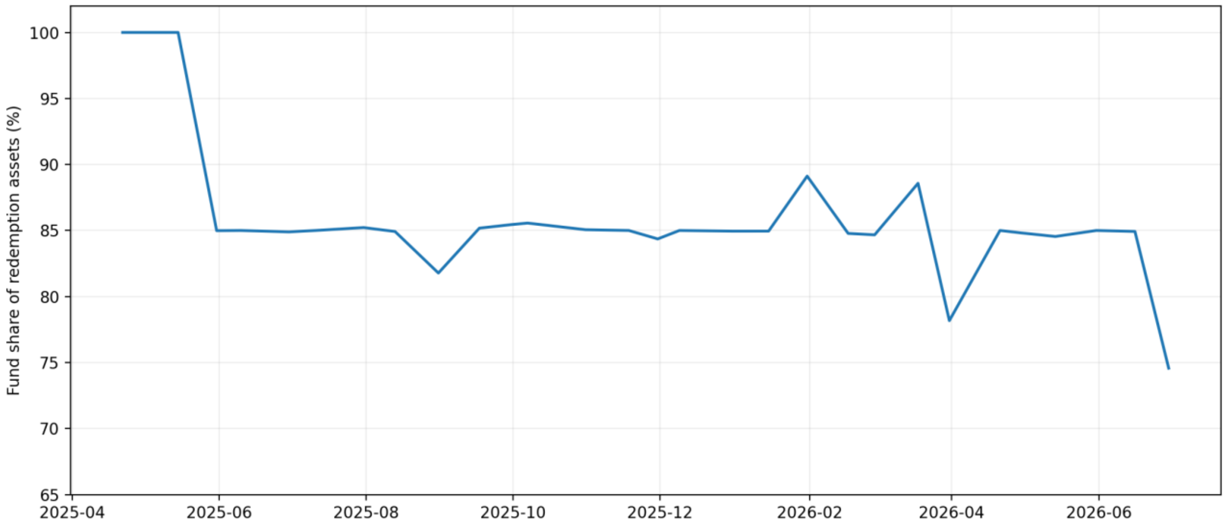

Figure 3 — Trend in the FRGXX fund's share of reserves.

4.1 Month-end observations

Date	Tokens	Assets	Cash	FRGXX	Coverage	Published surplus
30/04/2025	$2.128bn	$2.128bn	$0	$2.128bn	100.0000%	$0
31/05/2025	$2.177bn	$2.177bn	$326.8m	$1.850bn	100.0154%	$336,069
30/06/2025	$2.207bn	$2.207bn	$333.5m	$1.874bn	100.0362%	$798,768
31/07/2025	$2.170bn	$2.181bn	$322.3m	$1.859bn	100.4994%	$10.8m

Date	Tokens	Assets	Cash	FRGXX	Coverage	Published surplus
31/08/2025	$2.635bn	$2.655bn	$483.8m	$2.171bn	100.7596%	$10,194
30/09/2025	$2.687bn	$2.688bn	$391.5m	$2.297bn	100.0387%	$1.0m
31/10/2025	$2.985bn	$2.986bn	$446.1m	$2.540bn	100.0293%	$875,722
30/11/2025	$2.719bn	$2.720bn	$425.4m	$2.294bn	100.0398%	$1.1m
31/12/2025	$3.314bn	$3.314bn	$498.7m	$2.815bn	100.0005%	$16,647
31/01/2026	$5.067bn	$5.067bn	$551.4m	$4.515bn	100.0004%	$20,690
28/02/2026	$4.712bn	$4.716bn	$722.9m	$3.993bn	100.0854%	$24,589
31/03/2026	$4.393bn	$4.393bn	$958.9m	$3.434bn	100.0006%	$25,796
30/04/2026	$4.497bn	$4.497bn	$683.1m	$3.814bn	100.0010%	$45,877
31/05/2026	$4.725bn	$4.735bn	$710.2m	$4.024bn	100.2030%	$88,311
30/06/2026	$4.634bn	$4.635bn	$1.179bn	$3.456bn	100.0038%	$176,579

4.2 Surplus and timing adjustments

Gross surplus equals assets less redeemable tokens. Note C may then deduct purchases of USD1 that have been funded but not yet minted, or reflect other timing differences. The published surplus should not be interpreted as a capital buffer available to absorb a loss in fund value or a bank default.

Date	Gross surplus	Net adjustment	Published surplus
31/08/2025	$20.0m	-$20.0m	$10,194
17/09/2025	$14,227	-$2,724	$11,503
17/02/2026	$13.5m	-$13.5m	$20,804
28/02/2026	$4.0m	-$4.0m	$24,589
18/03/2026	$1.5m	-$1.5m	$24,671
31/05/2026	$9.6m	-$9.5m	$88,311

5. Money market fund: identification, quality and liquidity

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

5.1 Official metrics

Date	Class net assets	NAV	WAM	WAL	USD1 position	Share of class
31/05/2025	$173.065bn	1.0000	31	82	$1.850bn	1.07%
30/11/2025	$193.010bn	1.0001	36	79	$2.294bn	1.19%
30/04/2026	$192.146bn	0.9999	40	94	$3.814bn	1.99%

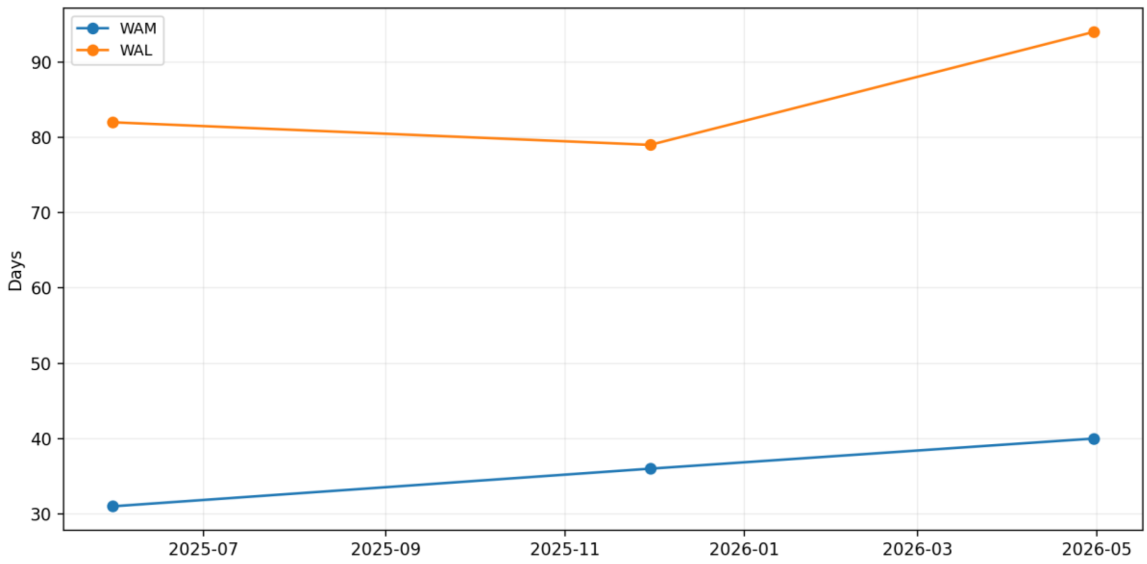

Figure 4 — WAM and WAL observed in official Form N-MFP filings.

CALCULATION — As of 30 April 2026, the $3.814bn USD1 position represented 1.99% of the class's net assets and approximately 2.30% of reported daily liquid assets. This comparison suggests a size that could be absorbed under normal conditions, but does not constitute a guarantee under stress.

5.2 Legal, financial and operational quality

Dimension	Assessment	Rationale
Legal	High	Registered fund, N-MFP reporting, Rule 2a-7 framework.
Credit	High	Government fund; Treasuries, agencies and collateralized repos.
Liquidity	High	Regulatory minima of 25% daily / 50% weekly; short WAM/WAL.
NAV	Very stable, not guaranteed	Snapshots: 1.0000; 1.0001; 0.9999.
Operational	High	Major asset manager, institutional infrastructure and monthly reporting.
Concentration	Monitor	A single fund and one share class concentrate most of the reserves.
BECTRA score	8.1/10	Good overall profile; concentration, dependencies and line-by-line transparency prevent a maximum score.

6. Fund look-through analysis

Fidelity's semiannual report as of 30 September 2025 shows, at Government Portfolio level, an aggregate composition of 49.8% repurchase agreements, 29.2% U.S. Treasury obligations, 24.3% U.S. government agency debt and -3.3% net other assets/liabilities. Percentages may exceed 100% before net liabilities are taken into account.

Category	% of net assets	Indicative value on $272.8bn
Repurchase Agreements	49.80%	$135.841bn
U.S. Treasury Obligations	29.20%	$79.650bn
U.S. Government Agency Debt	24.30%	$66.284bn
Net other assets / liabilities	-3.30%	-$9.002bn

NO-DOUBLE-COUNTING RULE — The USD1 reserve holds FRGXX shares. The underlying Treasuries, agencies and repos are held by the fund and are used solely to analyze the quality and liquidity of those shares.

7. Bank deposits and counterparty risks

The reports describe demand deposit and money market deposit accounts at U.S. commercial banks regulated by the Federal Reserve, in segregated accounts titled in BitGo's name for the benefit of holders. A portion may be held in a segregated account at BitGo. The reports state that balances may exceed the USD 250,000 FDIC insurance limit.

Date	Cash	Share of reserves
22/04/2025	$270	0.00%
10/06/2025	$328.4m	15.00%
13/08/2025	$334.3m	15.08%
07/10/2025	$387.6m	14.44%
09/12/2025	$409.6m	15.00%
17/02/2026	$785.2m	15.22%
21/04/2026	$637.3m	15.00%
16/06/2026	$686.0m	15.07%
30/06/2026	$1.179bn	25.43%

8. Redemption rights, Authorized Clients and Good Standing

8.1 Holder categories

Category	Direct BitGo right	Practical route
Authorized BitGo Client	Conditional direct contractual right	Yes, compliant request; payment to a bank account in the Client's name
Holder without a BitGo account	No demonstrated direct access	Secondary sale/transfer or through an intermediary
Platform customer	Rights against the platform under its contract	Depends on the platform; BitGo does not guarantee its obligations
Self-hosted wallet	Technical control of the token	No automatic direct right to fiat

8.2 Access conditions

Condition	Requirement
Account	Be a registered BitGo Client and have an active Account
Jurisdiction	Be legally permitted to use the services and USD1
KYC/KYB	Provide identity, beneficial-owner information and requested documentation
AML/CTF/Sanctions	Satisfy AML/sanctions controls and ongoing requests
Risk	Not present a high legal, compliance, fraud or security risk
Bank	Have an eligible bank account in the Client's name

8.3 Good Standing

Criterion	Requirement
Law	No violation of applicable laws
Liability	No act exposing BitGo to legal liability
Contracts	Compliance with the Agreement and incorporated terms
Information	Ongoing provision of requested information/documents
Risk	No high-risk status in BitGo's assessment
Sanctions	Neither a Restricted Person nor holding on behalf of one
Account	Active account, not suspended and not pending suspension/termination

8.4 Process and timing

Step	Action	Responsible party
1	Maintain an active Account and Good Standing	Client
2	Submit the request through the platform with all fields completed	Client
3	Transfer USD1 to the designated address	Client
4	Wait for sufficient confirmations/finality	BitGo / blockchain
5	Satisfy compliance reviews and information requests	Client / BitGo
6	BitGo approves and initiates payment net of fees	BitGo
7	Receipt into an approved bank account designated by and held in the Client's name	Bank / payment rail

CONTRACTUAL FACT — BitGo states that it uses commercially reasonable efforts to initiate the transfer generally within two business days after receiving a compliant request. This is a target estimate, not an SLA; banking delays, networks, outages, liquidity and law may extend it [S02].

FEES — Applicable fees are displayed on the platform and accessible through a restricted link. Their exact amount cannot be verified from the corpus. Network fees are separate.

8.5 Rejection, suspension and additional controls

BitGo may reject, hold or delay a request, within the limits of law and in its discretion, including for compliance reviews, sanctions, fraud, security, blockchain finality, missing information, high-risk concerns, transaction limits, legal restrictions or decisions by authorities. BitGo may also cease offering the service or supporting a Coin or blockchain.

8.6 Nature of the right and insolvency

The current terms characterize the right as contractual; they exclude a security interest and direct ownership of a specific reserve account or asset. The exact ranking applicable before the GENIUS Act becomes effective is not demonstrated by the materials.

LEGAL DEVELOPMENT — When applicable, the GENIUS Act provides holders with pro rata priority over required reserves and first-priority residual treatment in the event of a shortfall. As of 6 August 2026, the principal implementing rules cited remain proposed; the Act becomes effective no earlier than 18 months after 18 July 2025 or 120 days after final rules [S10].

9. Proof of Reserves and multichain architecture

PoR indicator 06/08/2026	Value
Oracle reserves	$3.989bn
Aggregate supply	3 988 298 628.26 USD1
Ratio	100.01%
Difference	$394,508
Oracle	0x691b74146cdba162449012aa32d3cbf5df77d4c4
Block	25698130
Function	latestBundle()

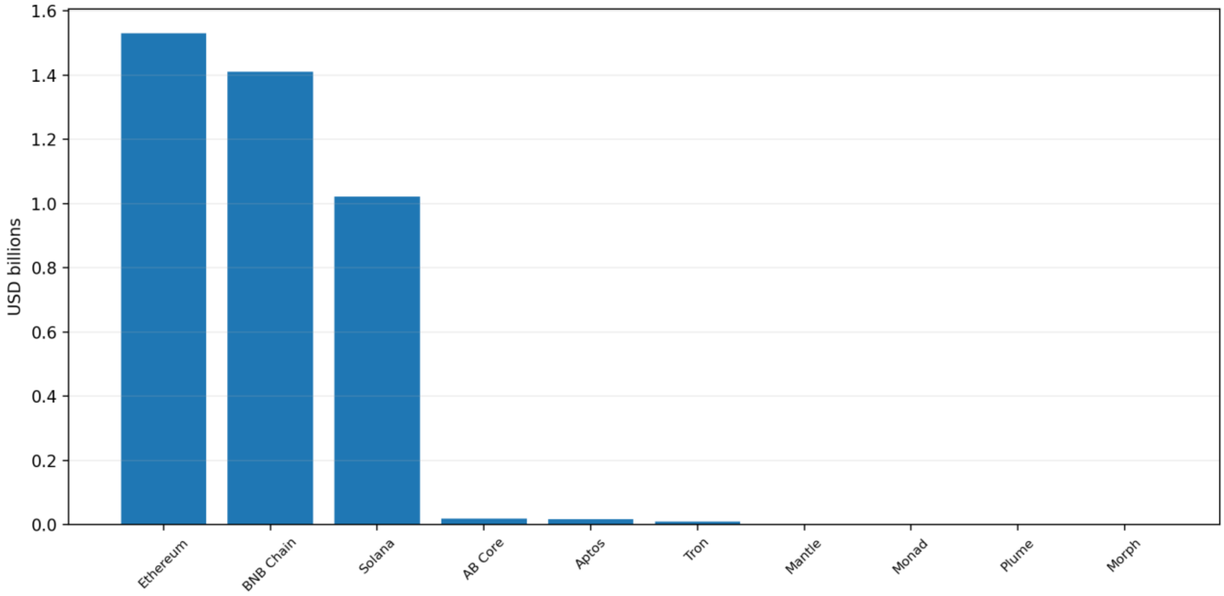

Figure 5 — USD1 supply by network in the 6 August 2026 PoR snapshot.

Ethereum, BNB Chain and Solana together represented 99.34% of the PoR supply. Technical concentration therefore remains high even though ten networks carried a positive balance.

TIMING RECONCILIATION — The PoR supply on 6 August 2026 is 13.9% below the 30 June 2026 observation. This is not an arithmetic anomaly: the dates differ. A strict reconciliation would require an attestation or mint/burn ledger as of 6 August.

LIMITATION — WLF documentation states that the dashboard complements the attestations, that data come from a Chainlink oracle and on-chain reads, and that accuracy is not guaranteed. The PoR does not test rights, legal segregation, controls, liquidity or off-chain commitments.

9.1 Risks by layer

Layer	Primary risk
Native smart contract	Bug, administrative privileges, pause, freeze, burn, wrong address.
Blockchain finality	Reorganization, congestion, number of confirmations, unavailability.
Bridge / CCIP	Third-party risk, rate limits, cross-chain messages, non-native representation.
Oracle PoR	Delay, off-chain source, aggregation error, key/contract.
Wallet / custodian	Key loss, freeze, policy engine, segregation and recovery.
Exchange / intermediary	Insolvency, withdrawal suspension, distinct contractual rights.
Bank / fiat rail	Cut-off, business days, rejection, sanctions and beneficiary account.

10. Risk matrix

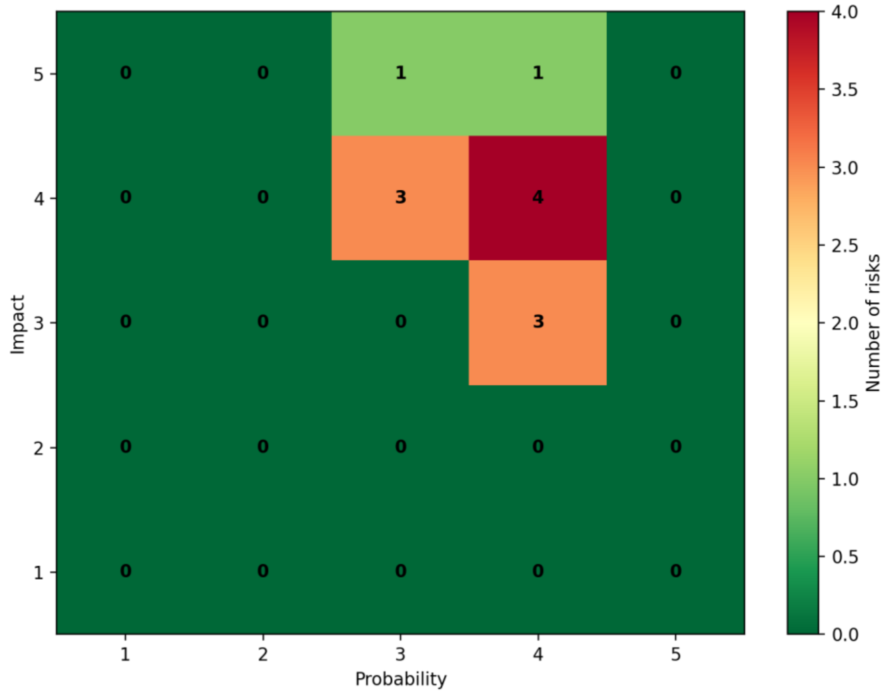

Figure 6 — Distribution of risks by impact and probability.

Risk	I	P	Score	Measure
Fund / bank liquidity risk	4	3	12	Maintain buffers and secondary exit routes
Concentration in a single money market fund	3	4	12	Internal limits and diversification of custodian/fund
Concentration and FDIC-limit exceedance	4	3	12	Bank due diligence and counterparty limits
No direct right for a non-client holder	5	4	20	Do not equate holding with access to redemption
Discretion to reject/suspend	4	4	16	Prequalification and contingency procedures
Undetermined ranking	5	3	15	Local legal opinion and insolvency analysis
Multichain / bridge / oracle risk	4	4	16	Whitelist contracts; limits by chain; monitoring
Bank timing and cut-off	4	4	16	Treasury buffer and banking calendar
Secondary-market depeg	4	3	12	Exit thresholds and multiple platforms
GENIUS transition / proposed rules	3	4	12	Monitoring and gap analysis
MiCA classification / distribution	4	4	16	Do not offer/admit without legal validation
Dependence on WLF brand	3	4	12	Limit exposure and prepare crisis communications

11. Stress tests

Redemption demand	Amount	Covered by cash	Required FRGXX redemption	% of FRGXX position
5 %	$231.7m	$231.7m	$0	0.00%
10 %	$463.4m	$463.4m	$0	0.00%
25 %	$1.159bn	$1.159bn	$0	0.00%
50 %	$2.317bn	$1.179bn	$1.139bn	32.95%
100 %	$4.634bn	$1.179bn	$3.456bn	99.99%

INTERPRETATION — As of 30 June 2026, aggregate cash statically covers approximately 25.4% of supply. This calculation does not prove intraday availability: accounts, banks, cut-offs, AML controls and payment capacity are not published.

Horizon	Prudent view	Missing data
Intraday	Only cash that is actually mobilizable; finality and cut-off risk	Cash by bank, processing capacity, hours and rail
24 h	Cash + daily fund redemption if instructed before cut-off	Contractual liquidity and settlement time
48 h	Close to BitGo's contractual target for a compliant request	Weekends, manual reviews and correspondent banks
5 days	Broader mobilization of the fund and bank reallocation	Fund behavior and counterparties under stress
30 days	Orderly reduction may be possible if markets and infrastructure function	Offsetting mint flows, adoption and regulatory constraints

11.1 Data required for the dynamic phase

- timestamped burns/mints by chain and attribution to actual redemption requests
- cash by bank, currency, account and time of availability
- cut-offs and timing for the fund, banks and payment rails
- queue depth, AML/KYT capacity, rejections and manual interventions
- account limits, minimum/maximum amounts and fees
- maturity schedule and line-by-line fund liquidity
- repo collateral, haircuts and counterparties
- simultaneous issuance flows offsetting redemptions
- secondary-market price, market depth and spreads by platform
- technical incidents, pauses, bridges, oracles and wallets

12. Accounting and audit implications

Accounting treatment depends on the applicable framework, contractual rights, business model, use and conversion capability. The report does not state a universal accounting conclusion.

Question	Consequence
Cash or cash equivalent?	Price stability alone is insufficient. Convertibility, value risk, maturity, direct access to redemption and treasury use must be analyzed.
Financial asset?	A direct contractual right against the issuer may be relevant for a Client; a holder without an account may have only a tradable digital asset and indirect rights.
Crypto-asset / intangible asset?	Possible under certain accounting frameworks and fact patterns, particularly without a direct contractual right; requires documented judgment.
Measure	Cost, fair value or another basis depends on classification; assess the principal market, peg and restrictions.
Impairment / credit risk	Assess the issuer, banks, fund, intermediaries and execution capability, not only the reserve ratio.
Presentation and disclosures	Describe concentration, restrictions, absence of deposit insurance, subsequent events and custody policies.

12.1 Recommended audit procedures

- Confirm on-chain balances using official addresses and networks.
- Verify beneficial ownership of wallets and key controls.
- Reconcile quantities to the general ledger and custodian/exchange statements.
- Read the applicable contractual version and determine whether the right is direct or indirect.
- Test an actual redemption or sale, including fees and timing.
- Check prices, spreads and depeg events at the reporting date.
- Assess business continuity, bridges, oracles and concentrations.
- Do not substitute the USD1 attestation for confirmation of the asset held by the company.

REFERENCES — Analyses must be tied to the applicable framework (IFRS, US GAAP or local standards). The supplied documents are insufficient to conclude for a specific entity without knowing its contract, holding model, use and materiality.

13. Regulatory update as of 6 August 2026

Authority	Text / event	Status	Possible consequence
OCC	Conversion of BitGo Trust Company, Inc. into BitGo Bank & Trust, N.A.	Final / effective	National charter #25366; OCC supervision
U.S. Congress	GENIUS Act, Public Law 119-27	Enacted law; transitional implementation	Federal framework; do not treat NPRs as final rules
OCC	GENIUS Act implementing regulations	Proposal (NPR)	Proposed prudential requirements
OCC	PS-01 / PS-02 reporting forms	Proposal / information collection	Proposed confidential weekly and quarterly reporting
FinCEN + agencies	Customer Identification Program GENIUS	Proposition	Proposed CIP

Authority	Text / event	Status	Possible consequence
OCC / Treasury	AML/CTF & sanctions GENIUS	Proposition	Proposed AML/sanctions program
SEC	Money Market Fund Reforms – Rule 2a-7	Final	Minimum liquidity 25% daily / 50% weekly; reformed fee framework
European Union	Regulation (EU) 2023/1114 – MiCA	In force	EMT: claim against issuer, redemption at par without fees, prohibition on interest; authorization to be verified
UEMOA	USD1 status	Not demonstrated	I do not know: no specific authorization was supplied or identified
CEMAC	USD1 status	Not demonstrated	I do not know: no specific authorization was supplied or identified

13.1 United States

BitGo Bank & Trust, N.A. is a national trust bank supervised by the OCC. This status does not turn USD1 into an insured deposit. BitGo's terms expressly state that Coins are not deposits or other bank liabilities and do not create a bank account for the holder [S02-S04].

The GENIUS Act is law, but its effective date and implementing rules must be distinguished. As of 6 August 2026, the OCC and FinCEN had published proposals covering, among other matters, the prudential framework, PS-01/PS-02 forms, CIP, AML/CTF and sanctions. They are not treated as final rules.

13.2 Money market fund and Rule 2a-7

The SEC's 2023 reforms increased minimum liquidity requirements to 25% daily liquid assets and 50% weekly liquid assets, removed the mechanical link between liquidity thresholds and gates/fees, and introduced a revised liquidity-fee framework. Institutional government funds are not subject to the mandatory liquidity fees applicable to certain prime/tax-exempt funds, unless the fund elects otherwise under its terms [S09].

13.3 European Union

A token referencing a single official currency generally falls within the e-money token category when offered to the public or admitted to trading in the Union. MiCA requires, among other things, an authorized issuer, a claim of the holder against the issuer, redemption at any time at par and without fees, and a prohibition on paying interest.

13.4 WAEMU and CEMAC

No specific official decision authorizing USD1, and no exhaustive analysis of the applicable national and community-level legislation, was provided. I do not know whether USD1 may be distributed or used without a license in any particular WAEMU or CEMAC jurisdiction. Local validation is required before any commercial deployment.

14. Two parallel views

14.1 Portfolio and reserve quality

> **VIEW —** Reserves are arithmetically covered, assets are of high overall quality, and the fund is liquid and transparent, but there is concentration in a single fund and banks are unnamed; overcollateralization is minimal.

14.2 USD1 system and holder rights

> **VIEW —** The principal risk for a company is not only asset quality: it lies in effective access to the BitGo account, Good Standing, controls, banking rails, wallet, blockchain, intermediaries and jurisdiction.

15. Answers to the 26 final questions

1. Who legally issues USD1 in each period?
BitGo Technologies, LLC through 11 December 2025; BitGo Bank & Trust, N.A. from 12 December 2025, subject to the exact observation date.

2. What is the exact role of World Liberty Financial?
Brand, ecosystem, documentation, distribution, interfaces and integrations. According to its documentation, WLF does not process mint requests; issuance/redemption obligations belong to BitGo.

3. Which assets are held directly in the reserves?
Cash and cash equivalents in segregated accounts, plus FRGXX shares. No directly held T-bill or direct reverse repo is identified.

4. What share is invested in the money market fund?
It varies; 74.57% as of 30 June 2026.

5. Which fund and share class are used?
Fidelity Investments Money Market Government Portfolio — Institutional Class, FRGXX, CUSIP 31607A703, Fund #2642.

6. What is the quality of the fund?
High from a legal, financial, operational and liquidity perspective, but not risk-free; BECTRA analytical score: 8.1/10.

7. Which securities and reverse repos are held indirectly?
At aggregate level as of 30 September 2025: 49.8% repos, 29.2% Treasuries, 24.3% agencies, -3.3% other assets/liabilities. The line-by-line list is undetermined.

8. What is USD1's concentration in the fund's assets?
1.07% as of 31 May 2025, 1.19% as of 30 November 2025 and 1.99% as of 30 April 2026 for the institutional class.

9. Would a large redemption be significant?
The position is modest relative to the class and the observed daily liquid assets, which is favorable under normal conditions. Stress capacity, cut-offs and simultaneous flows are not demonstrated.

10. Do the reserves reconcile?
Yes, arithmetically, for all 30 observations, including the published timing adjustments.

11. Does the PoR reconcile with the attestations?
Not on an identical date. The 6 August snapshot reconciles internally, but cannot be strictly reconciled to the 30 June attestation without intermediate flow data.

12. Are all tokens economically backed?
The reports state coverage equal to or greater than the redeemable tokens on the observed dates. This does not guarantee market price or permanent liquidity.

13. Do all holders have a direct right?
No. Direct operational access requires an active BitGo account and Good Standing.

14. Conditions to become an Authorized Client?
Onboarding, eligible jurisdiction, KYC/KYB, AML/sanctions, documentation, risk assessment, an Account and an eligible bank account.

15. Good Standing conditions?
Compliance with law and contracts, ongoing provision of information, absence of high-risk status or Restricted Person status, and an active, non-suspended account.

16. Grounds for rejection/deferral/suspension?
Compliance, sanctions, fraud, security, network finality, insufficient information, limits, laws/orders, banking rails, outages, liquidity or discontinuation of the service.

17. Timing and fees?
Typical target: initiation within two business days after a compliant request, with no SLA. Exact fees are displayed on the platform: I do not know their amount.

18. Into which account are dollars received?
Into an approved bank account designated by the Client and held in the Client's name.

19. Rights of a holder without a BitGo account?
No demonstrated direct route; secondary sale/transfer or use of an intermediary, subject to that intermediary's terms.

20. Rights of a platform customer?
Those provided by the platform's contract. I do not know what they are without its terms and conditions; BitGo does not guarantee the intermediary's obligations.

21. Ownership or security interest in the reserves?
Not in any specific asset under the current terms; the right is contractual.

22. Ranking in insolvency?
The exact current ranking is not demonstrated. The GENIUS Act provides for priority when applicable; legal advice remains necessary.

23. Differences by blockchain/wallet/intermediary?
Finality, smart contract, bridge, fees, freezes, custody, insolvency, availability and contractual rights vary.

24. Risks not visible in the attestation?
Internal controls, fraud, cybersecurity, bank concentration, AML throughput, queues, bridges, oracles, off-balance-sheet commitments and individual rights.

25. Consequences for treasury/accounting/audit/continuity?
Bank liquidity buffers, exposure limits, documented accounting classification, independent confirmations, exit testing, crisis procedures and diversification.

26. Missing information for a dynamic model?
Timestamped flows, cash by bank, hours/cut-offs, limits/fees, processing capacity, the fund's complete portfolio, counterparties/collateral, incidents and secondary-market data.

16. Limitations, assumptions and conclusion

16.1 Limitations

- No specific BitGo client agreement, authenticated fee schedule, SLA, or minimum/maximum redemption threshold was provided.
- The attestations are point-in-time examinations of management's assertion, not full audits of BitGo/WLF, internal controls, smart contracts or individual rights.
- The PoR is a snapshot on a date different from the latest monthly attestation and contains a disclaimer that accuracy is not guaranteed.

16.2 Assumptions

- Amounts described as "cash and cash equivalents" combine bank reserve accounts and, depending on the month, the segregated account at BitGo; they are not treated as physical cash.
- CUSIP 31607A703 is treated as an FRGXX fund share held directly by the reserve; the fund's assets are treated as indirect exposures, with no double counting.
- For chronological checks, the observation date takes precedence over the month in the title and the signature date.
- Timing differences are calculated as published surplus less gross surplus; components are not invented when they cannot be read with certainty.

16.3 Conclusion

USD1 shows consistent point-in-time arithmetic coverage and a reserve composed of generally liquid, high-quality assets. The legal transition to BitGo Bank & Trust, N.A., improved June 2026 disclosures and the PoR strengthen the transparency architecture. Nevertheless, economic robustness must not be confused with universal, immediate and unconditional access to redemption. For a company, a decision to hold USD1 must incorporate contractual rights, local regulatory classification, custody model, blockchain, intermediary, banks, timing and business continuity.

BECTRA POSITION — USD1 may be considered a potentially useful digital settlement or treasury instrument, but only within an arrangement in which the company has pre-validated its exit route, limited concentrations and retained independent bank liquidity.

Appendix A — Inventory of reserve reports

Month	Measurement dates	Signature	Firm	Pages	Abbreviated SHA-256
2025-04	22/04/2025 / 30/04/2025	06/06/2025	Crowe LLP	7	a284957b8b8860ce...
2025-05	15/05/2025 / 31/05/2025	10/07/2025	Crowe LLP	8	557c6268c3f58f68...
2025-06	10/06/2025 / 30/06/2025	01/08/2025	Crowe LLP	8	0fea6892cf2ba539...
2025-07	11/07/2025 / 31/07/2025	29/08/2025	Crowe LLP	8	4738e402bb529db4...
2025-08	13/08/2025 / 31/08/2025	02/10/2025	Crowe LLP	8	741d38a5bcf6539e...
2025-09	17/09/2025 / 30/09/2025	28/10/2025	Crowe LLP	8	08959461ba3da857...
2025-10	07/10/2025 / 31/10/2025	26/11/2025	Crowe LLP	8	bd064ff6688d2f48...
2025-11	18/11/2025 / 30/11/2025	22/12/2025	Crowe LLP	8	49f58859a437f342...
2025-12	09/12/2025 / 31/12/2025	30/01/2026	Crowe LLP	8	cd76bf8fae78d65e...
2026-01	15/01/2026 / 31/01/2026	26/02/2026	Crowe LLP	8	6dab379bffcf6466...
2026-02	17/02/2026 / 28/02/2026	27/03/2026	Crowe LLP	8	1cc9ae4cdbb5cc1b...
2026-03	18/03/2026 / 31/03/2026	29/04/2026	Crowe LLP	8	ce9c8232e058d243...
2026-04	21/04/2026 / 30/04/2026	28/05/2026	Crowe LLP	8	5e525bc65cf4f2b0...
2026-05	14/05/2026 / 31/05/2026	29/06/2026	Crowe LLP	8	4e38658304430fbf...
2026-06	16/06/2026 / 30/06/2026	31/07/2026	KPMG LLP	7	4ae6eafa613c967a...

Appendix B — Contract versions

Document	Version	Status	Use
WLF Terms of Service	2026-03-03	Current in supplied capture	World Liberty Financial interface/services
WLF USD1 Risk Disclosures	2026-03-03	Current in supplied capture but entity references may be stale	USD1 risks and redemption limitations
WLF Disclaimer	2026-03-03	Current in supplied capture	Interface/third-party disclaimers
BitGo Coin Minting & Redemption Services Terms	2026-03-25	Current web version reviewed	Mint/redeem, Good Standing, deadlines, bank account
BitGo Additional Terms	2026-03-25	Current web version reviewed	USD1 issuer; fees link
Old BitGo USD1 terms	2026-01-08	Obsolete/incompatible; contains placeholder	Historical terms; not relied on for current rights

Appendix C — Deliverable and control status

Item	Status
First / last observation	22/04/2025 / 30/06/2026
Reports / attestations	15 / 15
Observations	30
Fund / classes	1 / 1
Look-through lines	4 documented aggregates; individual lines undetermined
Underlying CUSIPs	Undetermined; fund-share CUSIP = 31607A703
Repo counterparties	Undetermined
Blockchains	10 with a balance in the PoR of 06/08/2026; 11 mentioned in the documentation
Reserve reconciliation	OK for 30/30
Chain reconciliation – attestations	OK for 30/30 at ETH/BNB/Other level
Internal PoR reconciliation	OK for the snapshot
Word QA	Visual rendering performed after generation
Excel QA	Valid OOXML; integrated checks; no known repair

Appendix D — Main sources

S01 — USD1 reserve reports April 2025–June 2026 (Primary supplied documents). Point-in-time reserve data and examination reports.

S02 — BitGo Coin Minting & Redemption Services Terms (BitGo). Client/User, Good Standing, mint/redeem process. Official source

S03 — BitGo Additional Terms (BitGo). USD1 issuer and fees link. Official source

S04 — OCC CAS conversion filing (OCC). Conversion and effective date. Official source

S05 — SEC Form N-MFP3 – 2025-05-31 (SEC). Fund class metrics. Official source

S06 — SEC Form N-MFP3 – 2025-11-30 (SEC). Fund WAM/WAL/liquidity/class assets. Official source

S07 — SEC Form N-MFP3 – 2026-04-30 (SEC). Fund WAM/WAL/liquidity/class assets. Official source

S08 — Fidelity Institutional literature (Fidelity). Fund/ticker/CUSIP/prospectus. Official source

S09 — SEC Money Market Fund Reforms (SEC). Rule 2a-7 amendments. Official source

S10 — GENIUS Act Public Law 119-27 (U.S. Congress / GPO). Federal stablecoin statute. Official source

S11 — MiCA Regulation 2023/1114 (EUR-Lex). EU e-money token framework. Official source

S12 — WLF official docs captured 2026-08-06 (World Liberty Financial). Technical, legal, ecosystem, PoR.