

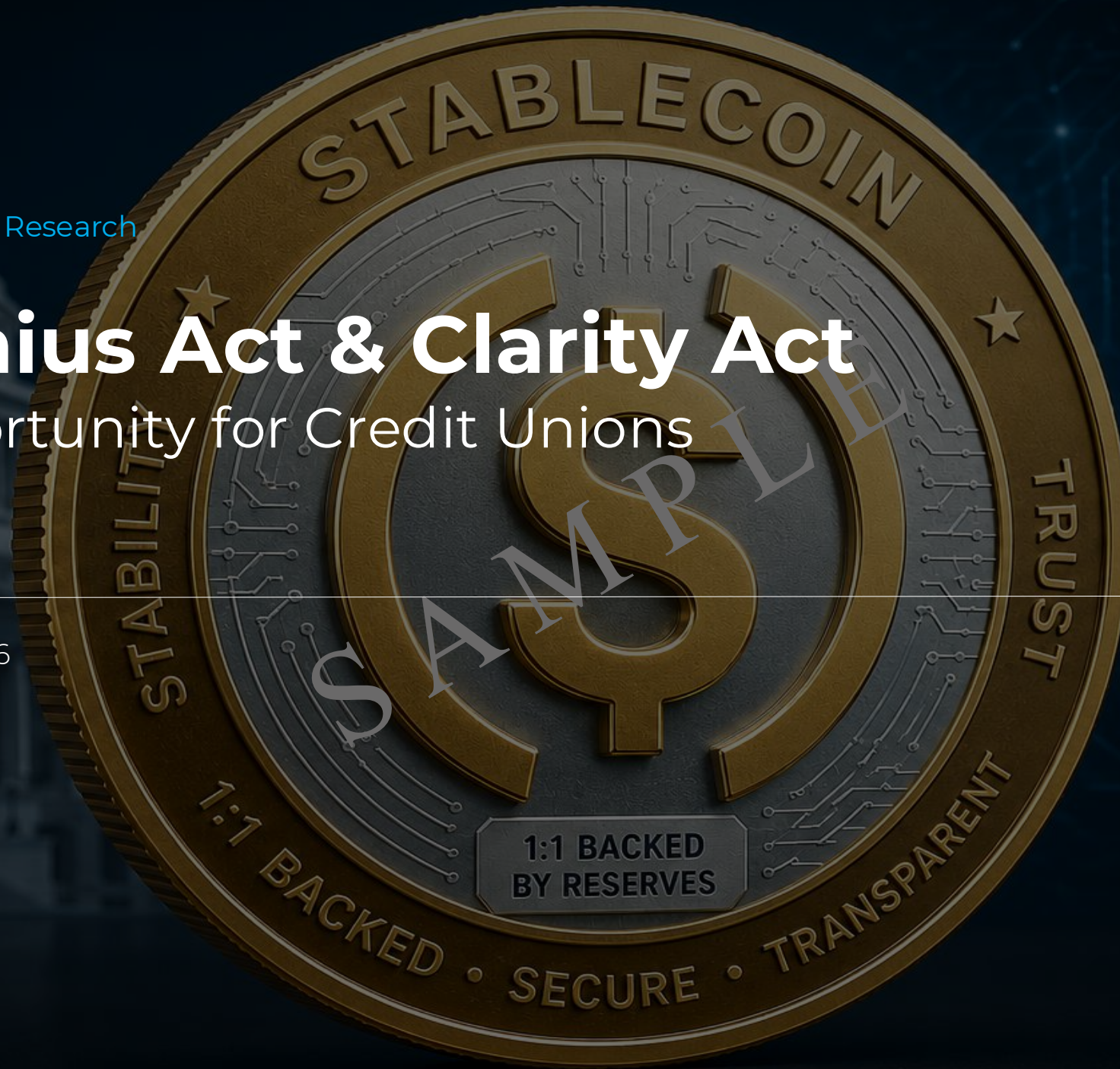


iMedia Inc. Research

Genius Act & Clarity Act

Opportunity for Credit Unions

June 1, 2026



GENIUS
ACT

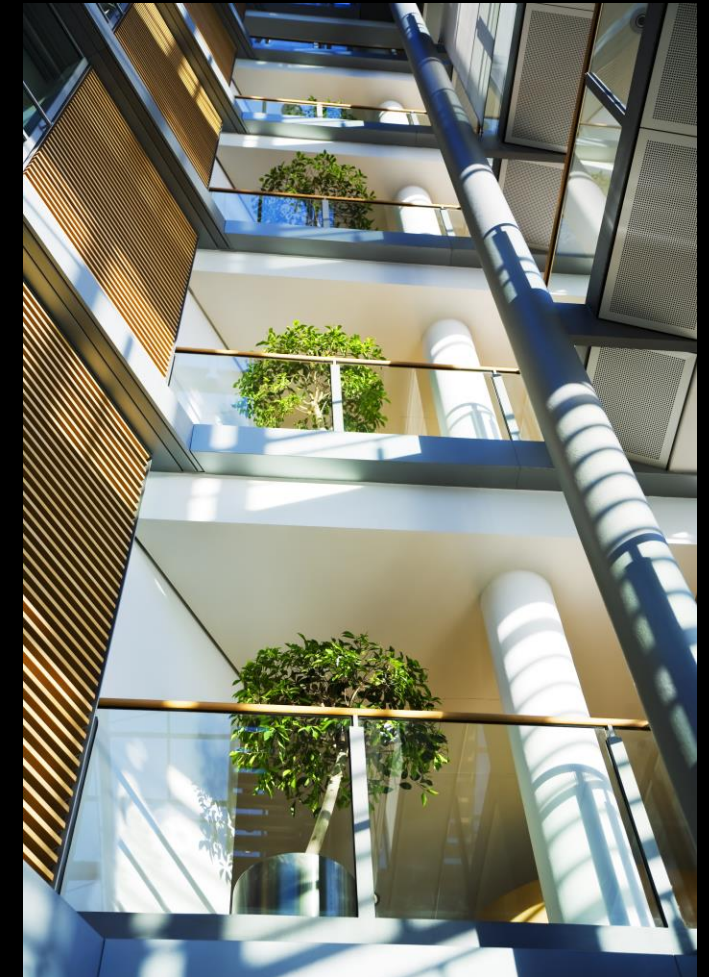
CLARITY
ACT



1. Executive Summary (continued)

KEY FINDINGS TO DATE:

- **Stablecoins could cannibalize bank deposits.** If customers hold stablecoins instead of bank accounts, financial institutions could lose the deposits they use to fund loans.
- **Consumer financial services are unbundling from single institutions.** Traditionally, credit unions build relationships with members who hold multiple financial products with the institution, such as deposit accounts, loans, and credit cards. Stablecoin adoption could disrupt this traditional intermediary role.
- **Competitors are moving fast.** SoFi launched its own stablecoin (SoFiUSD); Fidelity issued a digital dollar (FIDD); JPMorgan uses JPM Coin for institutional settlement. Credit union-focused vendors (InvestiFi, CryptoFi) are actively selling integration services to other credit unions.
- **Stablecoin issuance requires a subsidiary.** Under the GENIUS Act, FICUs cannot directly issue payment stablecoins. Issuance must flow through an NCUA-licensed Permitted Payment Stablecoin Issuer (PPSI) subsidiary, such as a Credit Union Service Organization (CUSO).

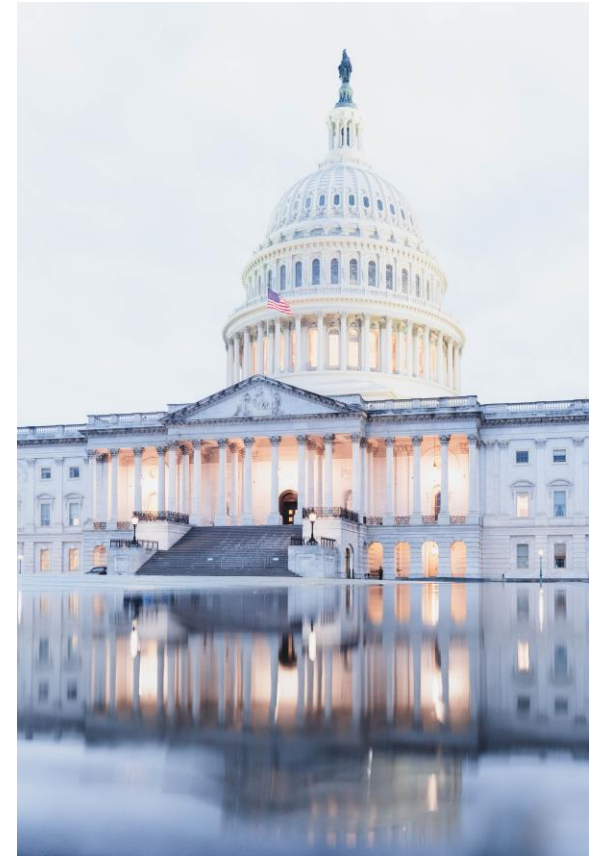




2. Context

Recent legislation and regulatory clarity have sped the integration of cryptocurrencies into existing financial systems. The **GENIUS Act** creates the first federal regulatory framework specifically for payment stablecoins. FICUs are insured depository institutions (IDIs) under the Act and cannot issue stablecoins directly; they must do so through a subsidiary such as a Credit Union Service Organization (CUSO). The NCUA has proposed a rule establishing licensing and examination requirements for FICU subsidiaries that wish to become Permitted Payment Stablecoin Issuers (PPSIs). NCUA has acknowledged that the costs of issuing payment stablecoins may be prohibitive for all but a few of the largest FICUs, and that jointly held FICU subsidiaries have significant potential to facilitate cooperation. The NCUA is actively soliciting comment on whether FICUs will seek to issue through existing CUSOs or form new subsidiaries.

The **Clarity Act** creates a comprehensive regulatory framework for digital commodities (distinct from payment stablecoins). It establishes a market structure for cryptocurrencies and allows financial institutions to use digital assets to perform their normal activities or services. Financial institutions including credit unions are not required to hold regulatory capital against digital assets held in custody or safekeeping, except to address operational risk. In other words, they would not be treated as deposits on the institution balance sheet. However, competing bills are not yet reconciled and legislative work is ongoing.





3. Member Potential

The following reviews legal consumer use of cryptocurrency: who is most likely to use cryptocurrency and what needs crypto fulfills in their lives.

3.1 Cryptocurrency User Profile

The majority of Americans have not used cryptocurrencies and do not believe they are reliable or safe. Americans most likely to use cryptocurrency are **men below the age of 40** who have transacted within the last five years. This is heavily weighted towards younger groups; 42% of men ages 18-29 have interacted with cryptocurrency. Asian Americans are overrepresented among cryptocurrency users. Most users made their first transactions during boom periods, such as during a spike in the price of bitcoin.

Cryptocurrency is used in a variety of illegal activities including money laundering, wire fraud, drug dealing, arms trade, and sanctions evasion. The attraction of and involvement with potential criminal enterprises must be considered when exploring a new potential member base.



4. Product Opportunities

The following section describes current and potential product offerings, with notes on feasibility, legal considerations, and open questions. Products are grouped from lower-complexity near-term options to higher-complexity longer-term opportunities. These products are categorized into consumer services, financial operational services, and crypto operator services.

Consumer Services

Interface directly with consumers, holding assets on their behalf, providing access, and taking on fiduciary/custodial responsibility.

PRODUCT	DESCRIPTION	EXAMPLE	DEPENDENCIES
Educational content / digital asset portal	A branded educational portal covering digital assets, blockchain, stablecoin mechanics, and crypto risk. Clarity Act (Section 314) requires registered trading entities to publish such materials.	Fidelity Crypto	Content development only
Crypto buy/sell/hold via third-party partner	Partner with a licensed fintech to provide members with the ability to buy, sell, and hold digital assets. Credit union does not hold crypto or become a custodian—the third-party handles custody.	InvestiFi, CryptoFi	Third-party vendor contract (NCUA-compliant); current practice at other CUs
ACH/Debit link to crypto exchange accounts	Members link their credit union account to an external cryptocurrency exchange, enabling crypto purchases via ACH or debit without native integration.	Coinbase, Kraken	Typical ACH; current practice
Crypto ETFs / ETPs (brokerage access)	Members access SEC-registered cryptocurrency exchange-traded funds and products through a self-directed brokerage account.	iShares Bitcoin Trust (IBIT)	Broker-dealer relationship or third-party brokerage platform



6. Competitor Products

6.1 Quick Look

A brief examination of fintechs, large banks, and credit unions in the crypto ecosystem and their product offerings, both current (✓) and roadmapped (→).

Competitor	Crypto Trading	Branded Stablecoin	Education	Pooled Custodial Wallet	Crypto-Backed Loans	Crypto Staking	Transfers to Ext. Wallets	ACH to Crypto Exchanges	Dedicated Exchange	Crypto ETP	Private Token	Tokenized MMF	Bank-to-Wallet	Crypto IRA
SoFi	✓	✓	✓	✓	→	→		✓						
PayPal	✓	✓		✓			✓							
Wealthfront										✓				
JPMorgan Chase								✓		✓	✓	✓	✓	
Fidelity	✓	✓		✓			✓			✓				✓
Bank of America		→				→		✓		✓				
Citibank		→			→			✓		✓				
Credit Union 1	✓			✓					✓					
Mid-MN FCU	✓			✓										
America's CU	✓			✓										
St Cloud		→												



7. Infrastructure Requirements

7.5 Roadmap

PHASE	TIMEFRAME	KEY ACTIVITIES
Phase 1: Foundation	estimated 0–6 months	Vendor RFP; legal review; member demand assessment; NCUA compliance checklist; educational content launch
Phase 2: Third-Party Launch	estimated 6–12 months	Launch crypto buy/sell/hold via third-party partner; app integration; member communication campaign
Phase 3: Issuance Decision	estimated 12–18 months	Evaluate solo CUSO vs. consortium PPSI model
Phase 4: Payments & Acceptance	estimated 18–36 months	Enable stablecoin loan payments; international remittance pilot; crypto ATM pilot

GENIUS Act estimated effective date January 18, 2027



What comes next...

Who are the vendors actually serving credit unions right now, and how do you evaluate them?

What does NCUA require before you can launch even a basic crypto buy/sell product?

Which of the 15+ products on the opportunity map are available to you today with no regulatory risk?

The full 70-page report including member potential analysis, product maps, vendor comparisons, infrastructure requirements, and risk frameworks:

- ✓ All 8 report sections
- ✓ 15+ product opportunities mapped
- ✓ Vendor landscape analysis
- ✓ Optional: free 30-minute strategy call with iMedia

Get the full report at \$595 with free 30-minute strategy call to walk through the research together.
