



Bitcoin Treasury Framework

Jurisdiction-specific guidance for corporate Bitcoin adoption — 2026

ORGANISATION PROFILE

Company Type	Non-Profit
Company Size	Small (11-50 employees)
Industry	Technology
Jurisdiction	United States
BTC Allocation	2% of treasury reserves
Risk Profile	Low — Conservative approach, suitable for initial adoption

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Bitcoin Treasury Adoption Framework for 2026 and Beyond

Prepared for: [Non-Profit Name] **Industry:** Technology **Jurisdiction:** United States **Proposed Allocation:** 2% of Treasury Reserves **Risk Profile:** Very Low

1. Regulatory Landscape — United States

1.1 Legal Classification of Bitcoin

Bitcoin is classified as a **commodity** by the **Commodity Futures Trading Commission (CFTC)** and as **property** for federal tax purposes by the **Internal Revenue Service (IRS)**. It is not recognized as legal tender by the U.S. government, nor is it classified as a security under the **Securities Act of 1933** or the **Securities Exchange Act of 1934**, as confirmed by the **Securities and Exchange Commission (SEC)** in multiple rulings. This dual classification impacts tax treatment, reporting obligations, and regulatory oversight.

1.2 Corporate Tax Treatment and Reporting Thresholds

- **Capital Gains Tax:** Bitcoin sales or disposals are subject to **corporate capital gains tax**, with rates aligned to the organisation's income tax bracket (currently **21% flat rate for C-corps**; pass-through entities may vary). Short-term gains (held <12 months) are taxed as ordinary income, while long-term gains (held >12 months) qualify for preferential rates (0%, 15%, or 20% for individuals, though non-profits are generally tax-exempt under **IRC § 501(c)(3)**).
- **Reporting Thresholds:** Transactions exceeding **\$10,000** in a single trade (or related transactions) trigger **Form 8300** filing requirements under the **Bank Secrecy Act (BSA)**. Additionally, **Form 1099-DA** (proposed by the **Infrastructure Investment and Jobs Act, 2021**) may require brokers to report digital asset transactions to the IRS by 2026, though final regulations are pending.
- **Unrelated Business Income Tax (UBIT):** Non-profits must assess whether Bitcoin trading or staking activities constitute **unrelated business income**, potentially subject to **UBIT at corporate rates** (currently 21%).

1.3 Relevant Regulatory Bodies and Compliance Obligations

Regulator	Primary Obligation	Key Compliance Requirement
IRS	Tax reporting and capital gains treatment	Form 8949 (Sales and Dispositions), Schedule D, and potential Form 1099-DA reporting
FinCEN	Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF)	Registration as a Money Services Business (MSB) if engaging in >\$1,000/day in transactions
CFTC	Commodity classification and derivatives trading oversight	Compliance with Dodd-Frank Act for leveraged or futures-related exposures
SEC	Securities law compliance (if Bitcoin is deemed a security in specific contexts)	Disclosure obligations under Regulation S-K for material holdings
State Regulators	Licensing for money transmission (varies by state)	New York BitLicense (if operating in NY) or equivalent state-level requirements

1.4 AML and KYC Requirements for Institutional Purchases

- **Know Your Customer (KYC):** All **registered custodians, exchanges, and OTC desks** (e.g., Coinbase Institutional, Fidelity Digital Assets, Kraken) require **corporate KYC**, including:
 - **Articles of Incorporation and EIN verification**
 - **Board resolution** authorizing Bitcoin purchases
 - **Beneficial Ownership Information (BOI) reporting** under the **Corporate Transparency Act (CTA, 2024)**
- **Anti-Money Laundering (AML):** Institutions must comply with **FinCEN's Travel Rule** (transferring >\$3,000 requires sender/recipient identification) and **Suspicious Activity Report (SAR) filings** for transactions exceeding **\$10,000** that appear suspicious.
- **Office of Foreign Assets Control (OFAC):** Screening against **SDN (Specially Designated Nationals) lists** is mandatory for all transactions.

1.5 Key 2025—2026 Regulatory Developments

- **SEC vs. Crypto Enforcement:** Pending litigation (e.g., **SEC v. Coinbase**, **SEC v. Binance**) may clarify whether certain Bitcoin-related activities (e.g., staking, lending) are deemed securities. A loss for the SEC could reduce regulatory uncertainty.
 - **Stablecoin Regulation:** The **Clarity for Payment Stablecoins Act (2024)** may indirectly affect Bitcoin treasury strategies by defining permissible stablecoin reserves, impacting liquidity management.
 - **Tax Reporting Expansion:** The IRS is expected to finalize **Form 1099-DA** requirements by **Q1 2026**, mandating brokers to report cost basis and proceeds for all digital asset transactions.
 - **State-Level Custody Laws:** **New York's BitLicense 2.0 (2025)** and **California's Digital Financial Assets Law (DFAL, effective July 2025)** impose stricter custodial requirements, including **proof-of-reserves audits**.
 - **Federal Reserve CBDC Pilots:** The **Federal Reserve's Project Hamilton** may influence long-term Treasury strategies if a **U.S. CBDC** is introduced, though Bitcoin's role as a non-sovereign asset would remain distinct.
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2. Accounting and Reporting (2026 Standards)

2.1 FASB ASU 2023-08 Fair Value Accounting

- **Applicability:** Effective for fiscal years beginning after **December 15, 2024**, **FASB ASU 2023-08** requires Bitcoin to be **measured at fair value** (Level 2 input) with **changes recorded in net income**.
- **Impact on Non-Profits:** Unlike for-profit entities, non-profits must classify Bitcoin as an **investment asset** (not inventory) and recognize **unrealized gains/losses** in the **statement of activities**, potentially increasing earnings volatility.

2.2 Balance Sheet Classification and Measurement Basis

- **Classification:** Bitcoin should be recorded as a **non-current asset** under "**Digital Assets**" or "**Investments**" if held for >12 months; otherwise, it may be classified as **current**.
- **Measurement Basis:**
- **Initial Recognition:** Recorded at **cost (fair value at acquisition)**.
- **Subsequent Measurement:** **Mark-to-market (MTM)** at each reporting date, with unrealized gains/losses flowing through the **statement of activities**.
- **Example Entry:**

Dr. Digital Assets — Bitcoin XX,XXX Cr. Cash XX,XXX (At acquisition)

Dr. Digital Assets — Bitcoin XX,XXX Cr. Unrealized Gain on Bitcoin XX,XXX (At remeasurement if price increases)

2.3 Mark-to-Market Implications and Earnings Volatility

- **Volatility Risk:** A **2% allocation** in a **\$10M treasury** (\$200K Bitcoin exposure) could fluctuate by \pm **\$40K** in a single quarter based on **20% price movements** (historical 90-day volatility).
- **Non-Profit Considerations:**
- **Donor Restrictions:** If Bitcoin is donated, **FASB ASC 958-605** requires recognition at **fair value on receipt**, with restrictions disclosed in **footnotes**.
- **Program vs. Investment:** Boards must distinguish between **operating reserves** (liquid) and **long-term investments** (illiquid) to avoid liquidity crunches.

2.4 Deferred Tax Accounting on Unrealized Gains/Losses

- **Temporary Differences:** Unrealized gains create **taxable temporary differences** (per **ASC 740**), requiring **deferred tax liability** recognition if the non-profit expects to sell at a gain.
- **Tax-Exempt Status:** **IRC § 501(c)(3)** organisations are generally exempt from **unrelated business income tax (UBIT)** unless Bitcoin activities are deemed **regular trade/business** (e.g., frequent trading).
- **Disclosure:** Footnotes must quantify **deferred tax assets/liabilities** and describe the **tax strategy** (e.g., hold-to-maturity vs. active trading).

2.5 Financial Statement Disclosure Requirements

- **FASB ASC 275-10 (Risks and Uncertainties):** Disclose **concentration risk** if Bitcoin exceeds **5% of total assets** (not applicable here at 2%).
- **ASC 820 (Fair Value Measurements):** Provide a **three-level fair value hierarchy** table, classifying Bitcoin as **Level 2** (observable inputs).
- **ASC 958-205 (Non-Profit Disclosures):** Describe:
 - **Investment objectives** (e.g., inflation hedge, long-term store of value)
 - **Liquidity risk** (e.g., "Bitcoin is highly liquid but subject to market volatility")
 - **Custody arrangements** (e.g., "Held with Coinbase Institutional under SOC 2 Type II audited cold storage")
- **Auditor Guidance:** **AICPA's Digital Assets Practice Aid (2024)** recommends:
 - **Independent verification of wallet addresses** via **proof-of-reserves audits**.
 - **Testing of internal controls** over private key management.

3. Custody and Security Architecture

3.1 Self-Custody vs. Qualified Custodian Trade-Offs

Criteria	Self-Custody (e.g., Multi-Sig)	Qualified Custodian (e.g., Coinbase, Fidelity)
Control	Full control over private keys	Relies on third-party security
Regulatory Compliance	Must self-comply with FinCEN, OFAC, and state laws	Custodian handles KYC/AML, Travel Rule, and reporting
Insurance	Limited; requires private crime insurance (~0.5–1% of AUM)	\$300M+ custodial insurance (e.g., Coinbase's Lloyd's policy)
Operational Burden	High (key management, audits, backups)	Low (custodian manages security and reporting)
Cost	~\$5K–\$15K/year (hardware wallets, audits)	~0.25–0.75% AUM/year (e.g., \$500–\$1,500 for \$200K allocation)

Recommendation for Non-Profit: Given the **very low risk profile** and **limited internal resources**, a **hybrid model** is optimal:

- **90% with a qualified custodian** (e.g., Coinbase Institutional) for compliance and insurance.
- **10% in self-custody** (e.g., **2-of-3 multi-sig**) for operational familiarity and redundancy.

3.2 Multi-Signature Setup Best Practices

- **Configuration:** **2-of-3 multi-sig** (e.g., via **Unchained Capital** or **Casa**) with keys distributed as follows:
- **Key 1:** Custodian (e.g., Coinbase)
- **Key 2:** Board-appointed treasurer (hardware wallet)
- **Key 3:** Third-party backup (e.g., **CryptoStorage AG** in Switzerland)
- **Thresholds:** Require **two signatures** for transactions >\$10K; **all three** for >\$50K.
- **Hardware Wallets:** Use **Ledger Enterprise** or **Trezor Safe 3** with **air-gapped signing**.

3.3 Named Regulated Custodians in the United States

Custodian	Regulatory Status	Insurance Coverage	Fees (2026)
Coinbase Institutional	NYDFS BitLicense, SOC 2 Type II	\$300M crime insurance (Lloyd's)	0.25—0.50% AUM/year
Fidelity Digital Assets	NYDFS Trust Charter, SEC-registered	\$250M custodial insurance	0.35—0.60% AUM/year
Kraken Institutional	FinCEN MSB, Wyoming SPDI Charter	\$100M crime insurance	0.20—0.45% AUM/year
Anchorage Digital	OCC National Trust Bank Charter	\$200M insurance (Aon)	0.40—0.70% AUM/year
Gemini Custody	NYDFS Trust License	\$200M FDIC-pass-through (cash only)	0.30—0.55% AUM/year

Recommended Primary Custodian: Coinbase Institutional due to:

- **Strong regulatory compliance** (NYDFS, FinCEN).
- **High insurance coverage** (\$300M).
- **Integration with accounting tools** (e.g., Bitwave, CryptoWorth).

3.4 Cold Storage Protocols

- **Geographic Distribution:** Keys stored in **three separate jurisdictions** (e.g., U.S., Switzerland, Singapore) to mitigate sovereign risk.
- **Air-Gapped Signing:** Transactions initiated offline via **hardware wallets** (e.g., Ledger Vault) with **manual approvals**.
- **Backup Procedure:**
- **Shamir's Secret Sharing (SSS)** for key reconstruction (e.g., **3-of-5 shards**).
- **Metal seed storage** (e.g., Cryptotag) for physical redundancy.

3.5 Insurance Structures and Underwriters

- **Crime Insurance:** Covers theft, hacking, and internal collusion.
 - **Underwriters:** Lloyd's of London, Aon, Marsh.
 - **Coverage Limits:** \$10M—\$500M (scalable to AUM).
 - **Cost:** 0.5—1.5% of insured value/year.
 - **D&O Insurance:** Extend Directors & Officers liability policy to cover Bitcoin-related governance decisions.
 - **Minimum Threshold for Non-Profit:** \$500K coverage (2.5x the \$200K allocation).
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4. Governance and Policy Framework

4.1 Board Resolution and Shareholder Approval

- **Board Resolution:** Required to authorize:
- **Bitcoin as a treasury asset class.**
- **Maximum allocation (2% of reserves).**
- **Delegation of authority** to the CFO/Treasurer for execution.
- **Sample Clause:**

> *"Resolved, that the Board approves the allocation of up to 2% of unrestricted net assets to Bitcoin, held as a long-term strategic reserve, with custodial and risk management policies as outlined in the Investment Policy Statement (IPS)."*

- **Non-Profit Specific:** No shareholder approval required, but **major donors** (if any) should be informed per donor transparency best practices.

4.2 Investment Policy Statement (IPS) Clauses

The IPS must include:

1. **Purpose:** *"Bitcoin is held as a non-correlated asset to hedge against long-term inflation and currency debasement."*
2. **Allocation Limits:**
 - **Maximum exposure:** 2% of total reserves.
 - **Rebalancing bands:** $\pm 0.5\%$ (i.e., buy if $< 1.5\%$, sell if $> 2.5\%$).

1. **Eligible Instruments: Spot Bitcoin only** (no derivatives, futures, or leveraged products).

2. **Liquidity Requirements:**

- **Minimum 50% of Bitcoin holdings** must be **liquid within 72 hours**.
- **No more than 10%** may be locked in **time-locked or staked protocols**.

1. **Counterparty Limits:**

- **No single exchange/custodian** may hold **>50%** of the allocation.
- **OTC desks** must be **SEC-registered** (e.g., **Genesis Trading, Cumberland**).

4.3 Acquisition Strategy: Lump Sum vs. Dollar-Cost Averaging (DCA)

Strategy	Pros	Cons	Recommendation
Lump Sum	- Lower transaction fees	- Timing risk (volatility exposure)	Not recommended for very low risk profile.
DCA (12 months)	- Smooths volatility	- Higher cumulative fees (~0.1%/trade)	Recommended: \$16.67K/month for 12 months to reach \$200K.

4.4 Rebalancing Triggers and Exit Criteria

- **Rebalancing:**
- **Quarterly review** of allocation percentage.
- **Automatic rebalance** if Bitcoin deviates by **±0.5%** from target (1.5—2.5%).
- **Drawdown Limits:**
- **Max drawdown:** 50% from purchase price (e.g., if Bitcoin drops from \$50K to \$25K).
- **Action:** **Halt further purchases** and **assess liquidation** if drawdown exceeds **60%**.
- **Exit Criteria:**
- **Regulatory black swan** (e.g., U.S. Bitcoin ban).
- **Mission drift** (e.g., Bitcoin no longer aligns with non-profit's goals).
- **Liquidity crisis** (e.g., treasury requires cash for operations).

4.5 Audit Committee Responsibilities

- **Quarterly Reporting:**
 - **Proof-of-reserves verification** (via custodian attestations).
 - **Wallet address reconciliation** (matching blockchain records to GL).
 - **Annual Audit:**
 - **Independent SOC 1 Type II audit** of custodian controls.
 - **Fair value assessment** by a **third-party valuer** (e.g., MVIS CryptoCompare).
 - **External Auditor Coordination:**
 - Provide **transaction-level data** to auditors (e.g., **chainalysis reports**).
 - Disclose **related-party transactions** (if any) per **FASB ASC 850**.
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5. Risk Management (Very Low Risk Profile)

5.1 Volatility Budgeting

- **Treasury Composition Assumption:**
- **Cash:** 50% (\$5M)
- **Bonds:** 30% (\$3M)
- **Equities:** 18% (\$1.8M)
- **Bitcoin:** 2% (\$200K)
- **Volatility Impact:**
- A **±20% Bitcoin move** = **±\$40K** impact on total treasury (**0.4%**).
- **Max tolerable drawdown:** **\$100K** (50% of Bitcoin allocation), or **1% of total treasury**.

5.2 Counterparty Risk Mitigation

- **Custodian Due Diligence Checklist:**
- **Regulatory licenses** (e.g., NYDFS BitLicense, OCC Charter).
- **Proof-of-reserves audit** (e.g., **Armanino LLP attestation**).
- **Insurance coverage** (\geq \$200M with **Lloyd's or Aon**).
- **SOC 2 Type II report** (last 12 months).
- **Banking partners** (e.g., **Silvergate, Signature, or JPMorgan** for fiat rails).
- **Exchange/OTC Desk Criteria:**
- **Minimum Tier 1 capital** \geq \$500M (e.g., **Coinbase, Kraken**).
- **No history of regulatory actions** (check **FinCEN, SEC enforcement lists**).

5.3 Concentration and Liquidity Risk

- **Concentration Limits:**
- **Single-asset exposure:** Bitcoin capped at **2%** (vs. **10% max** for equities).
- **Custodian exposure:** No single custodian holds **>50%** of Bitcoin.
- **Liquidity Management:**
- **90% of Bitcoin** must be **sellable within 72 hours** (held with **Coinbase/Fidelity**).
- **10% in cold storage** (illiquid but secure).
- **Stress Test:** Simulate a **30-day bank holiday** (e.g., **2023 Silicon Valley Bank collapse**) to ensure **fiat off-ramp accessibility**.

5.4 Operational and Cybersecurity Controls

- **Key Management:**
- **Multi-sig (2-of-3)** with **geographic distribution**.
- **Annual key rotation** (via **ceremonial signing** with auditors present).
- **Access Controls:**
- **Zero-trust model:** No single individual can initiate a transaction.
- **Biometric + hardware token authentication** for custodian logins.
- **Incident Response Plan:**
- **Immediate freeze** of funds if **unauthorized access** detected.
- **Pre-approved forensics firm** (e.g., **Chainalysis Reactor**) for breach investigation.

5.5 Scenario Analysis: 80% Drawdown

- **Assumptions:**
 - **Purchase price:** \$50,000/BTC.
 - **Drawdown to \$10,000/BTC** (80% decline).
 - **Allocation value drops from \$200K to \$40K.**
 - **Impact on Treasury:**
 - **\$160K unrealized loss = 1.6% of \$10M treasury.**
 - **No liquidity crisis** (cash + bonds cover 80% of reserves).
 - **Mitigation Steps:**
1. **Halt further DCA purchases.**
 2. **Assess tax-loss harvesting** (if other assets have gains to offset).
 3. **Board review** to decide: **hold, reduce, or exit.**
 4. **Public disclosure in Form 990 (Schedule D)** if material.
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6. Implementation Roadmap

Step	Timeframe	Key Actions	Responsible Party
1. Internal Education	Weeks 1—4	- Board workshop on Bitcoin basics, risks, and regulatory landscape.	CFO + External Advisor
		- Treasury team training on custody, reporting, and compliance.	Controller
2. Legal/Tax Counsel Engagement	Weeks 2—6	- Retain digital asset-specialized law firm (e.g., Perkins Coie, Cooley).	General Counsel
		- Obtain tax opinion letter on UBIT, capital gains, and reporting.	Tax Advisor
3. Draft Investment Policy Statement (IPS)	Weeks 4—10	- Develop Bitcoin-specific IPS (see Section 4.2).	CFO + Investment Committee
		- Board approval of IPS.	Board of Directors
4. Custodian/Vendor RFP	Weeks 6—12	- Issue RFP to 3—5 custodians (Coinbase, Fidelity, Kraken).	Treasury Operations
		- Evaluate fees, insurance, compliance, and integration capabilities .	CFO + External Advisor
5. KYC/AML Onboarding	Weeks 10—16	- Complete corporate KYC (EIN, Articles of Incorporation, BOI).	Compliance Officer
		- OFAC/SDN screening for all signatories.	Custodian
6. Pilot Tranche Purchase	Months 4—5	- Execute first \$20K purchase via OTC desk (e.g., Cumberland).	Treasurer
		- Test custody, reporting, and audit trails .	Controller
7. Treasury System Integration	Months 5—7	- Integrate custodian API with accounting software (e.g., NetSuite, QuickBooks).	IT + Finance
		- Set up automated mark-to-market reporting .	External Auditor
8. Ongoing Monitoring	Month 12+	- Quarterly rebalancing and board updates .	CFO
		- Annual IPS review and audit preparation .	Audit Committee

7. Pre-Adoption Due Diligence Checklist

Item	Status	Responsible Party	Notes
1. Legal Opinion Obtained	/	General Counsel	Confirm Bitcoin classification and compliance obligations.
2. Tax Advice Documented	/	Tax Advisor	UBIT, capital gains, and Form 990 reporting.
3. Accounting Treatment Confirmed	/	External Auditor	FASB ASU 2023-08 fair value adoption.
4. Custodian Selected and KYC Complete	/	Compliance Officer	Coinbase/Fidelity onboarding.
5. Insurance in Place	/	Risk Manager	\$500K crime insurance (Lloyd's).
6. Board Resolution Passed	/	Board Secretary	2% allocation approval.
7. Investment Policy Statement (IPS) Approved	/	Investment Committee	Bitcoin-specific clauses included.
8. Banking Partners Informed	/	Treasurer	Notify Silicon Valley Bank/JPMorgan of Bitcoin transactions.
9. Shareholder/Donor Disclosure Prepared	/	Communications	Transparency report for major donors.
10. Auditors Briefed	/	External Auditor	Provide Bitcoin audit plan .
11. Reporting Procedures Established	/	Controller	Monthly MTM and quarterly board reports.
12. Emergency Liquidity Plan Documented	/	CFO	Pre-approved OTC desk for rapid sales.

8. Key Resources — United States

8.1 Regulatory Bodies and Guidance

- **Internal Revenue Service (IRS):**
- [IRS Virtual Currency Guidance (2023)](<https://www.irs.gov/businesses/small-businesses-self-employed/virtual-currencies>)
- **Form 8949** (Sales and Dispositions) and **Schedule D**.
- **Financial Crimes Enforcement Network (FinCEN):**
- [FinCEN Digital Asset Guidance (2019)](<https://www.fincen.gov/resources/statutes-regulations/guidance/application-fincens-regulations-persons-administering>)
- **Securities and Exchange Commission (SEC):**
- [SEC Staff Accounting Bulletin No. 121 (SAB 121)](<https://www.sec.gov/ocr/staff-accounting-bulletin-121>) (custody obligations).
- **Commodity Futures Trading Commission (CFTC):**
- [CFTC Digital Asset Primer (2023)](<https://www.cftc.gov/LearnAndProtect/AdvisoriesAndArticles/index.htm>).

8.2 Industry Associations

- **Blockchain Association:** [blockchainassociation.org](<https://theblockchainassociation.org>) (policy advocacy).
- **Chamber of Digital Commerce:** [digitalchamber.org](<https://www.digitalchamber.org>) (regulatory updates).
- **AICPA Digital Assets Working Group:** [aicpa.org/digitalassets](<https://www.aicpa.org/digitalassets>) (accounting standards).

**8.3 Professional Service Firms

- **Legal:**
- **Perkins Coie** ([perkinscoie.com](https://www.perkinscoie.com)) — Bitcoin treasury structuring.
- **Cooley LLP** ([cooley.com](https://www.cooley.com)) — SEC/FinCEN compliance.
- **Tax:**
- **Deloitte Digital Assets Tax Group** ([deloitte.com](https://www.deloitte.com)) — UBIT and capital gains optimization.
- **Custody/Audit:**
- **Coinbase Institutional** ([coinbase.com/institutional](https://www.coinbase.com/institutional)) — Custody and execution.
- **Armanino LLP** ([armaninollp.com](https://www.armaninollp.com)) — Proof-of-reserves audits.

8.4 Essential Reference Documents

- **FASB ASU 2023-08:** [Fair Value Accounting for Crypto Assets](https://www.fasb.org).
 - **MicroStrategy Bitcoin Treasury Playbook (2024):** [microstrategy.com/bitcoin](https://www.microstrategy.com/bitcoin).
 - **KPMG Digital Assets Tax Guide (2025):** kpmg.com/us/digitalassets.
 - **Deloitte Bitcoin Treasury Framework:** [deloitte.com/bitcoin-treasury](https://www.deloitte.com/bitcoin-treasury).
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9. Market Context and Strategic Outlook (2026)

9.1 Post-2024 Halving Supply Dynamics

The **April 2024 Bitcoin halving** reduced block subsidies from **6.25 BTC to 3.125 BTC**, constricting new supply to **~450 BTC/day** (vs. **~900 BTC** pre-halving). With **institutional demand accelerating** (e.g., **BlackRock's IBIT ETF** absorbing **~10x daily issuance** in Q1 2025), the **supply-demand imbalance** is projected to drive **long-term appreciation**. For non-profits, this reinforces Bitcoin's role as a **non-correlated, scarce asset** within a diversified treasury.

9.2 Impact of Spot Bitcoin ETFs

The approval of **11 spot Bitcoin ETFs in January 2024** (e.g., **IBIT, FBTC**) has:

- **Increased accessibility** for traditional investors, reducing **counterparty risk** for corporate treasuries.
- **Deepened OTC liquidity**, enabling **larger block trades** (e.g., **\$50M+**) with **<1% slippage**.
- **Legitimized Bitcoin as an investable asset**, with **Fidelity and BlackRock** offering **treasury management solutions** by 2026.

For a **small non-profit**, ETFs are **not recommended** due to:

- **Higher fees** (0.25—0.90% vs. 0.20—0.50% for direct custody).
- **Indirect exposure risk** (ETF counterparty failure).

9.3 Macro Investment Case: Inflation Hedge in a High-Debt Environment

With **U.S. debt-to-GDP exceeding 120%** and **real yields negative** in 7 of the past 10 years, Bitcoin's **fixed supply (21M cap)** and **decentralized issuance** position it as a **long-term hedge against monetary debasement**. Unlike traditional reserves (cash, bonds), Bitcoin is:

- **Uncorrelated** to equity/bond markets (historical **~0.3 correlation** to S&P 500).
- **Resistant to political interference**, unlike gold (subject to **confiscation risk**, e.g., **Executive Order 6102, 1933**).
- **Portable and verifiable**, enabling **global treasury diversification**.

9.4 Why Small Technology Non-Profits Are Adopting Bitcoin

Technology-focused non-profits are uniquely positioned to benefit from Bitcoin adoption due to:

1. **Alignment with Mission:** Many tech non-profits (e.g., **Electronic Frontier Foundation, Tor Project**) already accept **Bitcoin donations**, reducing friction for treasury allocation.
2. **Donor Base Overlap:** Tech-savvy donors (e.g., **Silicon Valley executives**) increasingly prefer **Bitcoin contributions**, which can be **instantly converted to treasury reserves**.
3. **Operational Familiarity:** Teams with **blockchain/crypto experience** (common in tech non-profits) can **self-custody** a portion of reserves, reducing reliance on third parties.
4. **Inflation Sensitivity:** Tech non-profits often hold **high cash balances** for R&D; Bitcoin provides a **non-dilutive hedge** against **USD devaluation**.

By **2026**, we anticipate **5—10% of U.S. non-profits with >\$10M in reserves** will hold **1—5% in Bitcoin**, following the precedent set by **endowments** (e.g., **Harvard, Yale**) and **corporate treasuries** (e.g., **MicroStrategy, Block**). For **[Non-Profit Name]**, a **2% allocation** represents a **prudent, low-risk** entry point with **asymmetric upside potential**.

End of Report