PUBLIC INVESTORS ADVOCATE BAR ASSOCIATION

piaba.org
888-621-7484
1300 McGee Dr, Ste 112, Norman, OK 73072

July 20, 2026

Re: Digital Asset Market Clarity Act

Dear Senator:

We write on behalf of the Public Investors Advocate Bar Association (PIABA), an international bar association comprised of attorneys who represent investors in disputes with the securities industry. Since its formation in 1990, PIABA has promoted the interests of the public investor in all securities and commodities arbitration forums, while also advocating for public education regarding investment fraud and financial industry misconduct.

As the Senate considers the Digital Asset Market Clarity Act (the CLARITY Act), PIABA writes to express support for preserving state authority and including core investor protections. In its current form, and as it relates to cryptocurrency exchanges like Coinbase, the CLARITY Act lacks important provisions necessary to protect American investors and risks codifying a structure that permits continued victimization of senior citizens, retirees, veterans, and vulnerable adults.

Guardrails to address conflicts of interest and self-enrichment by government officials are an important part of the debate over the CLARITY Act, but Congress must not lose sight of the need for investor and consumer protections to be included in the law. Americans who lose their life savings to crypto fraud deserve nothing less than a bill that prioritizes true consumer protections. As the Senate debates the CLARITY Act, we respectfully urge the legislation include, at minimum, the following:

Mandatory antifraud policies with dedicated compliance staff. For nearly a century, broker-dealers and investment companies have been statutorily required to supervise accounts and maintain anti-fraud policies and procedures. With Americans reporting more than $11 billion in cryptocurrency-related fraud losses in 2025 alone, the cryptocurrency economy should adhere to no lesser standard.

Preservation of private rights of action and state anti-fraud enforcement. The CLARITY Act must preserve a meaningful private right of action for consumers and investors harmed by cryptocurrency market participants, and ensure state regulators retain full authority to enforce anti-fraud laws and regulate digital market participants. Without such preservation of state authority, retail investors lose a critical layer of protection federal agencies alone cannot provide.

Strong, durable consumer protections. Technology should not determine the scope of investor and consumer protection; retail investors deserve the same protections whether an investment is offered through a traditional brokerage account or a digital platform.

We urge you to reject any cryptocurrency market structure legislation that does not meet these standards. Ethics reforms and investor protections are not competing priorities; both are necessary if Congress is to pass legislation that Americans can trust.

Sincerely,

Michael C. Bixby
President, Public Investors Advocate
Bar Association