Three jurisdictions that shape the market without being chosen for it

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The United States, the United Kingdom and the United Arab Emirates appear in almost every Swiss or Singapore mandate without being candidates for the client's headquarters. The United States sets the terms of the global dollar-stablecoin market, supplies most of the venture capital and most of the enforcement precedents, and excludes everyone who has not registered there. The United Kingdom is the common-law reference point for Singapore and Hong Kong courts and the home of much of the legal thinking on digital assets as property. It is also a market of 67 million people that the Swiss and Singapore firm reaches, if at all, through London. The Emirates are the jurisdiction clients cite when they want to leave, with Dubai's VARA and Abu Dhabi's ADGM competing with Zug and Singapore for founders and funds. This chapter gives each a short treatment organised around one question: what should a client based in Zug or Singapore expect from it?

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The treatment is deliberately brief. Each of the three regimes would fill a book. The state of the law in the United States in particular changed faster in the eighteen months before 30 June 2026 than in the preceding decade. The aim is orientation, with flags where the ground is still moving.

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