制裁、凍結及承諾背後的技術現實

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每一種主要的法定貨幣支持穩定幣，其合約都設有容許發行人凍結或銷毀指定地址上代幣的功能。Tether和Circle已應執法及制裁機關的要求使用這些功能數千次。這些功能之所以存在，是因為發行人的贖回承諾受其打擊洗錢及制裁義務約束；如發行人無法拒絕向受制裁人士贖回，便無法在任何地方合法營運。

對執業者而言，這意味兩件事。第一，穩定幣可被扣押。瑞士檢察官或新加坡法院可取得命令，要求發行人凍結某地址上的代幣；即使持有人的私鑰不受影響，發行人亦會遵從。第H部分第III章及第N部分第III章描述有關程序。第二，穩定幣持有人須承擔其代幣因前手持有人的行為而被凍結的風險，因為篩查是針對地址及交易紀錄進行，而不理會現時持有人是否無辜。持有穩定幣的庫房，應在接收轉入款項前先行篩查，正如第F部分第VII章及第L部分第VI章所解釋；並應交由託管人持有，而該託管人的條款須訂明，如發行人凍結託管人的綜合地址，將如何處理。

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