CONTINENTAL
STOCK TRANSFER & TRUST

July 21, 2026

SEC Crypto Task Force, via online submission

Re: Support for STA Letter on Tokenized Securities Framework

To Whom It May Concern:

Continental Stock Transfer & Trust Company respectfully submits this letter in support of the July 1, 2026 letter submitted by the Securities Transfer Association regarding the Commission's development of a regulatory framework for tokenized securities. As a registered transfer agent we support innovation in the securities markets, but believe any tokenization framework must preserve investor protection, issuer authorization, accurate shareholder records, transfer controls, and market integrity.

We agree with STA that the Commission should clearly distinguish between issuer-sponsored tokenized securities and unaffiliated third-party or synthetic tokens. STA's letter explains that Issuer-Sponsored Tokens are actual securities issued or tokenized with the issuer's consent and capable of being integrated with the issuer's official ownership records, while Third-Party Tokens do not establish a legal relationship between the token holder and the issuer.

This distinction is essential. Third-Party Tokens may confuse investors, impair issuer governance, create disclosure and market-integrity risks, and bypass the shareholder-record and corporate-action infrastructure that protects issuers and investors. STA's letter identifies risks including reduced demand for issuer shares, loss of reliable holder information, reputational harm, inadequate disclosure, investor confusion, insider-trading and market-abuse concerns, and sanctions, AML, and transfer-control issues.

Accordingly, Continental Stock Transfer & Trust Company supports STA's recommendation that any tokenized-securities relief require clear issuer authorization, prominent disclosures, transfer controls, and compliance procedures. We also support STA's recommendation that the Commission work to modernize DRS so issuer-sponsored tokenized securities can move efficiently between traditional and tokenized form and compete on a fair and neutral basis.

For these reasons, Continental Stock Transfer & Trust Company respectfully urges the Commission to adopt a framework that prioritizes genuine issuer-sponsored tokenized securities, excludes unaffiliated Third-Party Tokens from tokenized-securities relief unless appropriate safeguards are imposed, and modernizes market infrastructure to support issuer-authorized tokenization. STA's conclusion makes these same recommendations.

Sincerely,

Steven G. Nelson

X

President and Chairman
Continental Stock Transfer & Trust Company

ContinentalStock.com
INDEPENDENT SPIRIT, RELENTLESS DEDICATION.
1 State Street, 30th Floor | New York, NY | 10004