

cbi • VU

WHITE PAPER

EDITION I • JUNE 2026

Second Citizenship for Bitcoiners

*A Vanuatu framework for **sovereignty**.*

JURISDICTION
REPUBLIC OF VANUATU

AUTHORITY
CITIZENSHIP ACT, CAP. 112

POSITION
17°44'S • 168°19'E

21 CBI • A DIVISION OF BITCITIZEN LLC • LICENSED AGENT, EL SALVADOR FREEDOM PASSPORT

What this paper covers.

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About this paper. Prepared by 21 CBI, a division of Bitcitizen LLC and a licensed agent of the El Salvador Freedom Passport program, authorized by The Bitcoin Office of El Salvador. Program figures are stated in US dollars and verified against the Vanuatu Citizenship Act, Cap. 112, and Order No. 215 of 2016 as of May 2026. Visa-free counts follow the Henley Passport Index, 2026. Citizenship-by-investment rules and visa-free access change; we re-verify quarterly. Nothing here is tax or legal advice for your specific situation. Consult a qualified tax advisor regarding your circumstances before acting. Projected fund returns are estimates and are not guaranteed.

EXECUTIVE SUMMARY

Apply self-custody logic to your *legal* position.

If you would not leave your coins on an exchange, why leave your legal status at the mercy of a single government?

Regulation is tightening around digital-asset holders, and not in ways that give high-net-worth Bitcoiners peace of mind. Self-custodied Bitcoin now draws automatic reporting. Cross-border transfers trip compliance flags. Banking access narrows under the banner of risk management. The privacy that drew you to Bitcoin is being legislated away one framework at a time.

A second citizenship answers a different question than a hardware wallet, but it answers it the same way: by removing a single point of failure. A cold wallet secures your wealth on-chain. A second passport secures your legal identity off-chain. One government, one passport, one tax regime, one set of diplomatic agreements is the same structural risk as one bank, one currency, one monetary policy.

This paper makes the case in full. It maps the pressures bearing down on Bitcoin holders in 2026, explains how Citizenship by Investment (CBI) actually works as a transparent legal mechanism rather than a shortcut, and shows why Vanuatu is the cleanest fast option in its class: a thirty-to-sixty-day file, a zero-personal-income-tax jurisdiction, and a passport weighted toward the financial capitals of Asia.

It is also honest about the trade-offs. Vanuatu lost Schengen visa-free access in December 2024, and the program tightened its due diligence sharply across 2024 and 2025. We treat that tightening as a feature, not a bug. A clean, well-documented Bitcoin file is exactly what the stricter screen now rewards, and building that file is the work.

Where 21 CBI fits is straightforward. We are the Bitcoin-native advisor in this market. We think in sats, we accept Bitcoin, and we have run the on-chain source-of-funds reconstruction that trips up everyone else. The rest of this paper shows the math, the process, and the proof.

30-60

DAYS, CLEAN
FILE

\$145K

DSP SINGLE, ALL-
IN

0% Taxes

INCOME
CAPITAL GAINS ·
ESTATE

87

VISA-FREE
DESTINATIONS

PLATE I · MOUNT YASUR

— TANNA · REPUBLIC OF VANUATU

A single passport is a single
point of *failure*.

I

The new era of sovereign *citizenship.*

Capital is repositioning. Henley & Partners projected that more than 142,000 high-net-worth individuals would relocate across borders in 2025, leaving behind aggressive enforcement, asset-disclosure regimes, and capital controls in the traditional financial centers.¹ The destinations absorbing that capital, the United Arab Emirates and Switzerland among them, are not accidental.

Not everyone reads it as flight. The Tax Justice Network pushes back on the exodus framing, noting that the millionaires reported to be leaving a country amount to roughly 0.3% of its millionaire population, a statistically small share.² Both readings point a Bitcoiner the same way. This is not about running. It is about optionality, built before it is needed.

The timing is not arbitrary. The OECD's Crypto-Asset Reporting Framework (CARF) moves from design into force in 2026. Reportable crypto-asset data is collected from 1 January 2026, with

the first automatic cross-border exchanges due in 2027, and more than seventy jurisdictions have already committed.³ Governments are closing the reporting gap between fiat and Bitcoin. The voluntary era is ending.

Bitcoiners are responding the way Bitcoiners respond to single points of failure: not with evasion, but with infrastructure. A second citizenship is pre-positioning made legal. It gives an individual a recognized identity, and a set of rights, that do not depend on the goodwill of one jurisdiction.

A passport from a Bitcoin-friendly country offers more than convenience at a border. It is a legally recognized standing outside your home country's exclusive reach: the right to bank, to reside, to structure, and to move. Bitcoin always promised personal sovereignty. A second citizenship is where that promise becomes enforceable in the physical world.

The common link between Bitcoin and second passports is the desire for control.

BITCOIN MAGAZINE⁷

II

The pressure is *multidirectional.*

High-net-worth Bitcoiners are not just facing market swings. They are facing escalating legal, financial, and physical pressure, from several directions at once.

Tax reporting. In the United States, brokers began reporting digital-asset transactions on the new Form 1099-DA for activity on or after 1 January 2025, with gross proceeds first and cost-basis reporting phasing in from 2026.⁴ Internationally, CARF extends the same logic across borders. What once felt voluntary is becoming mandatory and automatic.

De-banking. After the 2023 collapse of crypto-aligned banks, the surviving institutions grew risk-averse. The FDIC's 2024 Risk Review flags crypto-asset exposure as a notable operating risk for banks.⁵ Compliance desks routinely sideline Bitcoin-linked individuals to protect anti-money-laundering postures, regardless of an applicant's clean legal standing.

Physical safety. TRM Labs has documented a sharp rise in so-called wrench attacks: physical

extortion targeting known crypto holders by force or threat.⁶ For holders of meaningful portfolios, custody is no longer only a question of keys. It is a question of address privacy and personal protection.

Mobility friction. Single-passport dependence concentrates every one of these risks in one jurisdiction's rules: tax, travel, reporting, and in some countries compulsory service. When that jurisdiction changes its mind, you have no second position to fall back to.

Each pressure individually demands vigilance. Combined, they erode the sovereignty Bitcoin was built to deliver. A second passport restores the missing dimension: the ability to move with intention across jurisdictions, not just across borders.



III

Bitcoin already taught you *this*.

A single passport is a single point of failure. You eliminated that risk for your money. Citizenship is next.

The cypherpunks held a simple conviction: that individuals should not need permission from a central authority to transact, to communicate, or to move. Bitcoin made that conviction real for money. It replaced trust in institutions with cryptographic proof, and it removed the intermediary who could freeze, inflate, or deny access.

The same structural insight applies to citizenship. A person who holds a single passport, under a single government, subject to a single tax regime, with travel access defined by a single set of treaties, carries the same concentration risk as a person who holds all their wealth in one bank, in one currency, under one central bank's policy. The failure mode is identical. So is the fix: redundancy, optionality, and the removal of a single dependence.

This is not a metaphor. It is an architectural principle. The International Monetary Fund is explicit that citizenship is not the same thing as tax residency, and well-designed programs keep that line intact.⁸ A second passport does not erase your obligations. It gives you legal footing in more than one place, so that no single jurisdiction holds your entire position.

For a Bitcoiner, the move is consistent rather than novel. You already self-custody. You already verify rather than trust. You already think in terms of resilience across cycles. Applying that same discipline to your legal status is not a lifestyle upgrade. It is the next logical position in a strategy you have already committed to.

1 of 1

THE SINGLE-
JURISDICTION RISK

2

POSITIONS, AFTER A SECOND
PASSPORT

∞

BITCOIN'S BORDERS. NOW YOUR
LEGAL ONES.

IV

How Citizenship by Investment actually works.



CBI is a transparent legal mechanism, not a shortcut. Citizenship by Investment is the legal pathway by which a sovereign nation grants citizenship in exchange for a government-approved contribution.

First, the screen. Every serious program runs applicants through know-your-customer, anti-money-laundering, and sanctions checks aligned to OECD and FATF norms. Vanuatu layers three authorities: the Financial Intelligence Unit, the police force through its INTERPOL channel, and immigration services, with third-party verification. The screen is the product. A program whose passport holds value is a program that says no.

Second, the contribution. The qualifying investment is typically a national development contribution, and it creates a transparent legal record of the funds. This is where Bitcoin enters with care. Vanuatu does not accept cryptocurrency directly into the state account. Instead, you settle your engagement with a licensed agent in Bitcoin, Lightning, or USDT; the agent converts through a regulated venue and

remits the government contribution in fiat, with documentation at every step. You fund the application from your stack without creating an undocumented transfer.

Third, the grant. On approval by the Citizenship Commission, the contribution settles, the applicant takes an oath, and the certificate and passport issue. Most programs include a spouse and dependent children on one application. Citizenship is permanent and hereditary; the passport renews on a fixed cycle while the citizenship itself does not expire.

This is the opposite of the tabloid framing. There is no vending machine. There is a regulated contribution, a documented source of funds, and a screen designed to keep bad files out, because the value of every passport already issued depends on it.

PLATE II • ASIA-PACIFIC REACH

— EIGHTY-SEVEN DESTINATIONS

A passport weighted toward
Asia.

V

Why Vanuatu, and where it is *honest*.

Vanuatu offers the fastest clean citizenship by investment in the world. A complete, well-documented file moves from submission to passport in thirty to sixty days, against four to eight months or longer elsewhere. It is one of the few programs at its price point that works natively with a Bitcoin-funded engagement.

The tax structure is the draw. Vanuatu levies zero personal income tax, zero capital gains tax, zero inheritance tax, and zero corporate income tax. A fifteen percent value-added tax applies to local consumption inside Vanuatu. A second citizenship does not by itself change your tax residency; that is a separate, deliberate piece of planning, and we walk it on the call.

The passport is weighted toward Asia. It reaches eighty-seven destinations visa-free or visa-on-arrival, including Singapore, Hong Kong, and Malaysia, the financial capitals of the region that leads on digital-asset regulation.⁹ In March 2025 Vanuatu passed the Virtual Asset Service Providers Act, putting a licensing framework

around exchanges and custodians.¹⁰ This is a jurisdiction leaning toward digital assets, not away.

Now the honest part. In December 2024 the Council of the European Union ended Schengen visa-free access for Vanuatu passport holders, and the United Kingdom now requires a Standard Visitor visa.¹¹ The EU cited due-diligence concerns across investor-citizenship files. We do not promise the access is returning on any timeline; treat it as gone and decide on the rest.

Across 2024 and 2025 Vanuatu tightened its regime: a regulatory overhaul, an in-person biometric enrolment requirement, and stronger vetting. Every applicant now attends one biometric appointment, in Port Vila, Dubai, Hong Kong, or New Caledonia. The file is no longer fully remote, and that discipline is precisely why the passport still carries weight. A clean Bitcoin file is rewarded by the stricter screen, not penalized by it.

What did not change: the eighty-seven Asia-Pacific destinations, the zero-tax structure, and the citizenship itself.

CBI.VU · PROGRAM DESK

VI

The math, *shown*.

Most firms charge fifteen to twenty-five percent of total cost with fees buried in fine print. We charge five percent of the government contribution. Flat. Here is every line for a single applicant on the Development Support Programme.



Government contribution	\$130,000
DSP, single applicant. Direct to the Republic of Vanuatu.	
21 CBI advisory	\$6,500
Five percent of the government contribution. Flat.	
Due diligence & VFIU screening	\$5,000
FIU, INTERPOL, and verification. Flat per file.	
Birth registration & national ID	\$2,500
Civil registration under the Citizenship Act. Per applicant.	
Passport enrolment	\$1,000
Biometric capture and document issuance. Per applicant.	
<i>All-in, single applicant</i>	<i>\$145,000</i>

By family size

Couple	\$169,500
Government \$150,000 + advisory \$7,500 + per-applicant filings.	
Family of three	\$188,750
Government \$165,000 + advisory \$8,250 + per-applicant filings.	
Family of four	\$208,000
Government \$180,000 + advisory \$9,000 + per-applicant filings.	
Each additional dependent	+\$19,250
Government \$15,000 + advisory \$750 + filings.	

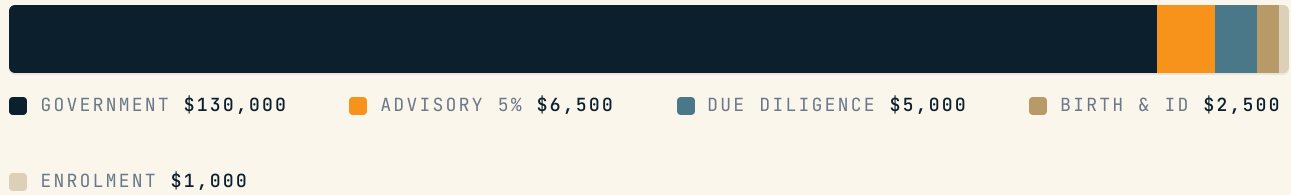
Settle the 21 CBI engagement in Bitcoin, Lightning, or USDT. Credit cards and bank transfers are accepted as needed. The government contribution is remitted in fiat by the licensed agent. Live BTC and sats equivalents are shown on the calculator at cbi.vu/pricing. Government figures verified against Order No. 215 of 2016, Citizenship Act, Cap. 112.

BY THE NUMBERS

The math and the map, at a glance.

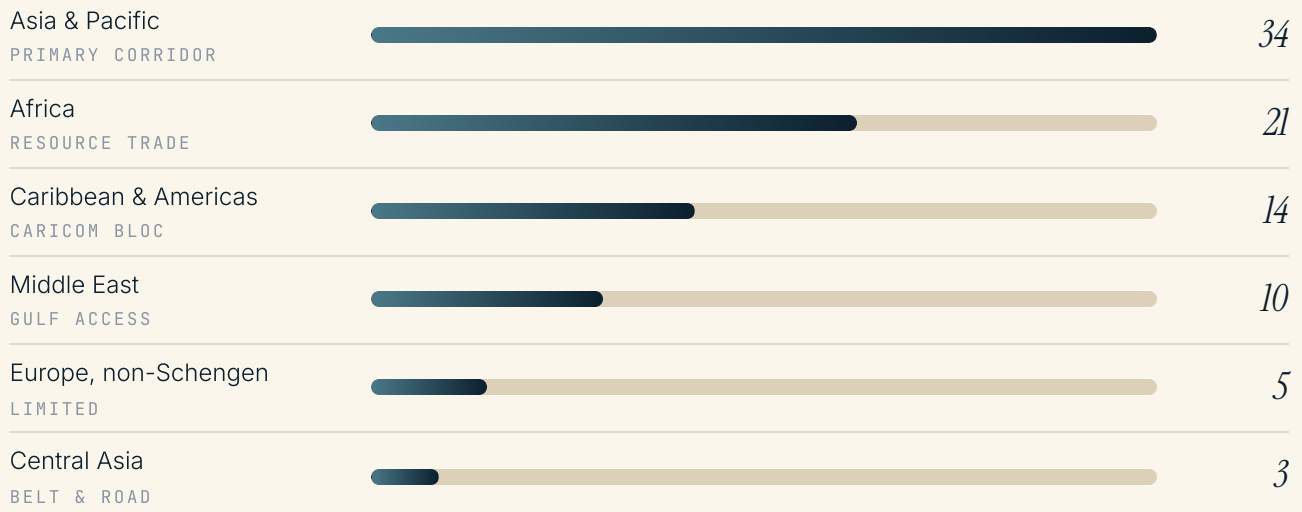
Where the \$145,000 goes

DSP, single applicant, all-in. The government contribution is the overwhelming majority; the 21 CBI advisory is a flat five percent of it.



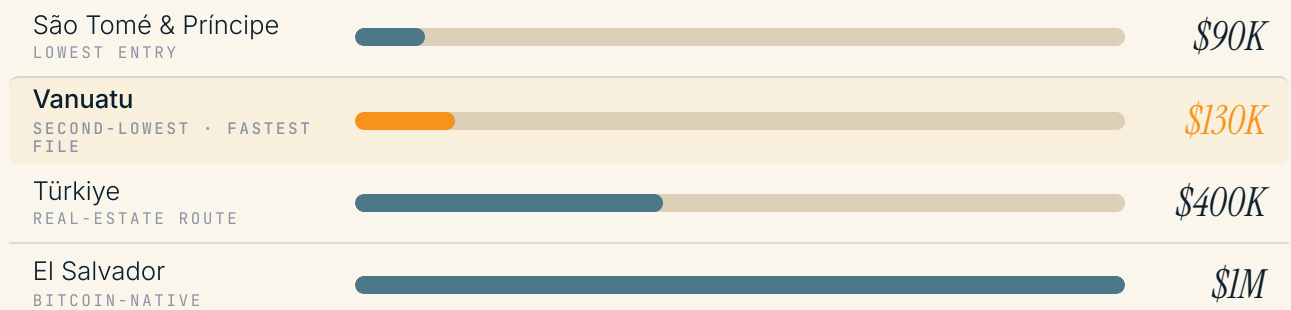
Eighty-seven destinations, by region

Visa-free, visa-on-arrival, and eTA combined. Henley Passport Index, 2026.



Where Vanuatu sits in the slate.

Government contribution minimum, single applicant, across the programmes we advise on.



VII

The CIIP alternative, with the fund *recoverable.*



The Capital Investment Immigration Plan pairs a smaller government contribution with a fund subscription you can recover, rather than donate in full.

Government contribution	\$110,000
<small>CIIP program component. Non-refundable.</small>	
Cocoa Sustainable Fund subscription	\$50,000
<small>Redeemable after a four-year hold. Returns not guaranteed.</small>	
21 CBI advisory	\$5,500
<small>Five percent of the government contribution component.</small>	
Due diligence & screening	\$5,000
<small>FIU, INTERPOL, and verification. Flat per file.</small>	
Birth registration, national ID & enrolment	\$3,500
<small>Per applicant. Single-applicant figure shown.</small>	
<i>All-in, single applicant (gross)</i>	<i>\$174,000</i>
Net cost after fund redemption, year four	~\$124,000
<small>The \$50,000 subscription is redeemable after the hold. Projected yield is not guaranteed.</small>	

The distinction that matters: the fund subscription is a financial instrument, not a fee. It is held for the statutory period and redeemable thereafter, which is why the net cost can fall below the all-in DSP figure. The trade-off is the four-year hold and no guarantee on the projected yield.

The rule of thumb: the DSP for speed and simplicity; the CIIP when the four-year hold is acceptable and recovering capital matters more than the lowest sticker. We model the gross and the net against your own timeline on the call, so the comparison is made on your numbers, not on a brochure's.

VIII

Source of funds, *on-chain*.

This is the part where Bitcoiners actually get stuck. The Financial Intelligence Unit does not care how many sats you hold. It cares whether you can show the trail from the original purchase to your current address.

The screen is procedural, not philosophical. The question is never whether Bitcoin is real wealth. The question is whether you can present an auditable chain of custody, with documentation at every transition, in a form a compliance officer can verify without a follow-up request. Most files have one or two gaps. The work is finding them before the FIU does.

The four primitives. Almost every file is built from four document types: exchange records showing the original purchase and the fiat source that funded it; bank statements for the fiat leg; wallet history tracing the coins to addresses you control; and signed messages proving you hold the keys to those addresses. The FIU never needs your keys. It needs cryptographic proof that the addresses are yours.

The two halves. The single most common gap is a file that shows the exchange side or the

self-custody side, but never both, tied together. The exchange record proves the purchase happened. The signed message proves the destination wallet is yours. Stitch the two and the chain of custody is intact.

The edge cases. Mining rewards document through pool statements and hash-rate evidence. Bitcoin earned as payment documents through invoices and the matching on-chain receipt. Pre-exchange and early holdings reconstruct from on-chain history plus an affidavit. None of it is exotic to us. All of it is exotic to a traditional CBI agent who wanted a wire transfer.

This is the single largest reason a Bitcoin file is rejected or delayed elsewhere, and the single largest reason to work with an advisor who has run the reconstruction before.



IX

21 CBI, the Bitcoin-native *advisor*.

The freedom a second citizenship offers is not a passport picked off a shelf. It is decentralized wealth fitted, cleanly, into a world built on forms, disclosures, and conflicting regulation. That fitting is the job.

21 CBI is the citizenship-by-investment advisory built by Bitcoiners, for Bitcoiners, and a division of Bitcitizen LLC. We accept Bitcoin natively. We think in sats. We advise on a second citizenship as a strategic asset, not a luxury purchase. We built the firm because no one in the industry treated Bitcoin wealth as an asset class rather than a compliance problem.

Adam Juchniewicz, CEO, leads every first call himself. He is a US Air Force veteran, holds an LL.M. in European and Comparative Law from the University of Malta, spent over a decade at the US Department of Homeland Security on immigration policy, and has been stacking sats since 2020. He is a licensed agent of the El Salvador Freedom Passport, authorized by The Bitcoin Office of El Salvador, and advises from

lived experience across four continents, not from a brochure.

The model is deliberately anti-corporate. No platform dashboard. No junior associate. No chatbot. One advisor, one direct line. Your file is handled with compartmentalized, need-to-know discretion, because your second passport is no one else's business. The structure is the same one Bitcoin rewards: direct, peer to peer, no intermediary layers.

What we do not do is also the point. We will tell you when Vanuatu is the wrong answer for your file, and steer you to São Tomé, El Salvador, or Türkiye instead. We have told prospects to not pursue a second citizenship at all. Honesty is the brand. The math is the proof.



Adam Juchniewicz, CEO.

US AIR FORCE VETERAN.
LL.M., EUROPEAN AND COMPARATIVE LAW, UNIVERSITY OF MALTA.
OVER A DECADE AT THE US DEPARTMENT OF HOMELAND SECURITY ON
IMMIGRATION POLICY.
STACKING SATS SINCE 2020. LICENSED AGENT OF THE EL SALVADOR
FREEDOM PASSPORT, THE BITCOIN OFFICE OF EL SALVADOR.

X

The process, step by step.

The support model is not a template. It is shaped around your jurisdiction, your risk profile, and how you hold your wealth. Here is the Vanuatu path.



01 Initial consultation

We map your goals, backup plan, privacy, tax structure, or relocation, and confirm whether Vanuatu's framework fits. If it does not, we say so and point you to the program that does.

02 Eligibility and approval in principle

A preliminary screen clears the obvious blockers. The Financial Intelligence Unit issues an approval-in-principle letter that lets the file proceed to document collection.

03 Document preparation and source of funds

Passport scans, police clearances, and financial statements, plus the on-chain source-of-funds reconstruction. We build the file the FIU is going to read, and close every gap before it does.

04 Filing

We assemble and submit the complete application. No late filings, no gaps, no compliance errors that send a file into enhanced review and add weeks.

05 Approval and contribution

On approval by the Citizenship Commission, the government contribution settles. You fund the engagement in Bitcoin; the licensed agent remits the contribution in fiat, documented at each stage.

06 Biometric, oath, and issuance

You attend one in-person biometric appointment in Port Vila, Dubai, Hong Kong, or New Caledonia, take the oath, and receive the certificate. The passport follows, by embassy collection or private courier.

07 Optional post-citizenship support

Banking introductions, entity structuring, and relocation logistics, when you want them. Never pushed as a default.

XI

Three file *shapes*.

We do not publish client names or invented praise. We publish the shape of the file, because that is what tells you whether yours resembles one we have already run. Details are composited and anonymized.



SINGLE APPLICANT • UNITED STATES

Coinbase and Strike, with self-custody back to 2017.

A US-based holder with a clean exchange history and a hardware wallet funded over several years. The work was the source-of-funds stitch: matching exchange withdrawals to signed messages from the receiving addresses. A complete file cleared the FIU and reached a passport inside the speed band, with no forced liquidation and no taxable event created by the funding path.

COUPLE • ASIA-PACIFIC RESIDENT

Mobility-first, with a CRS-reporting home jurisdiction.

A couple whose priority was Asia-Pacific access and a structure that did not leave their entire position inside one CRS-participating country. The DSP fit on speed and tax structure. We paired the passport recommendation with a frank read of what citizenship does and does not do for tax residency, and referred the residency-planning piece deliberately rather than overpromising.

FAMILY OF FOUR • FOUNDER

Pre-exchange holdings and a mining period to document.

A founder with early holdings that predated clean exchange records, plus a stretch of mining income. The reconstruction combined on-chain history, pool statements, and a signed affidavit for the earliest coins. The family filed together on one application. The lesson generalizes: the harder the history, the more the advisor's reconstruction experience is worth.

Illustrative composites for explanatory purposes. Timelines depend on file completeness and FIU processing, and are not guaranteed. Every file is screened on its own facts.

XII

Questions we are actually asked.

Can I pay in Bitcoin?

You settle the 21 CBI engagement in Bitcoin, Lightning, or USDT. Vanuatu does not take crypto into the state account, so the licensed agent converts and remits the government contribution in fiat, documented throughout. You fund from your stack without an undocumented transfer.

Will I owe tax in Vanuatu?

Vanuatu has zero personal income, capital gains, and inheritance tax. A passport does not by itself change your tax residency. If you are leaving a citizenship-based system such as the United States, that is separate, deliberate planning. Consult a qualified tax advisor for your situation.

Is the file remote?

Mostly, but not entirely. Since 2025 every applicant attends one in-person biometric appointment, in Port Vila, Dubai, Hong Kong, or New Caledonia. Anyone still advertising a fully remote Vanuatu file is working from stale information.

What about the EU and the UK?

Schengen visa-free access was revoked in December 2024, and the UK now requires a Standard Visitor visa. We do not promise it is returning. The eighty-seven Asia-Pacific destinations, the tax structure, and the citizenship itself are unaffected.

Is the program legitimate?

Vanuatu is a sovereign UN and Commonwealth member. The program operates under the Citizenship Act, Cap. 112, and tightened its due diligence sharply across 2024 and 2025. A clean, documented file is rewarded by the stricter screen.

How long does it take?

Thirty to sixty days from a clean file to a passport, the fastest in the industry. The variable is file completeness, which is exactly what we manage. Source-of-funds gaps, not government processing, are what add time.

THE NEXT STEP

Begin your sovereignty.

Book a confidential strategy session with Adam Juchniewicz, CEO. Thirty minutes, one direct line, the file owner on the call. We confirm the right track, the family configuration, the source-of-funds posture, and the realistic timeline. No obligation, no sales funnel.

CBI.VU/BEGIN • THE BITCOIN STANDARD OF CITIZENSHIP

APPENDIX

References & sources.

Sources verified as of May 2026. Investment-migration rules and visa-free access change; figures are re-verified quarterly against the issuing authority and the destination's official portal.

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13. OECD, "Misuse of citizenship and residency by investment programmes," on due-diligence standards.



YOUR KEYS · YOUR PASSPORT · YOUR SOVEREIGNTY

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