

# AnakaBank — Private Blockchain Operations Add-On Charter

## GAZZETTA UFFICIALE DELL'ORDINE SOVRANO MILITARE DI MALTA

## OFFICIAL GAZETTE OF THE SOVEREIGN MILITARY ORDER OF MALTA (GUOSMM)

| Field              | Value                                                    |
|--------------------|----------------------------------------------------------|
| Document ID        | GUOSMM-E-2026-008                                        |
| Series             | E                                                        |
| Document type      | Supplemental Activity Add-On Charter                     |
| Instrument version | 1.0                                                      |
| Title              | AnakaBank — Private Blockchain Operations Add-On Charter |
| Base charter       | GUOSMM-C-2026-005                                        |
| Licence number     | LICENSE-ANAKABANK-BLOCKCHAIN-SHOSJJ-2026-002             |
| Activity ID        | blockchain-network-operations                            |
| Published          | 2026-07-06T18:00:00Z                                     |
| Effective          | 2026-07-06T18:00:00Z                                     |

---

## AnakaBank — Private Blockchain Operations Add-On Charter

**Registration/publication number:** GUOSMM-E-2026-008

**Licence number:** LICENSE-ANAKABANK-BLOCKCHAIN-SHOSJJ-2026-002

**Base charter:** GUOSMM-C-2026-005

---

### Shared standard terms (incorporated)

### Authority and issuance chain

**Official long name:** Sovereign Military Hospitaller Order of St John of Jerusalem of Rhodes and of Malta.

**Recognized designations (same sovereign authority):** - **SMOM** — Sovereign Military Order of Malta - **SHOSJJ** — Sovereign Hospitallers Order of St. John of Jerusalem (GUOSMM-A-2026-003)

SMOM and SHOSJJ are short forms of the **same** sovereign international legal personality under the official long name; GUOSMM uses all three forms interchangeably.

1. **Sovereign authority:** official long name (SMOM / SHOSJJ designations) — published in GUOSMM Tier 1.
2. **Monetary issuer:** Treasury issues **SCUDO** under GUOSMM-A-2026-001. **GRU** is **monetary policy** for the tokenized reserve basket (commodities, currencies, securities, ...) — **not** the issuer. **OMNL is not the issuer.**
3. **License issuer:** **SHOSJJ Licensing Authority** under GUOSMM-A-2026-002 — **OMNL is not the licensor.**
4. **OMNL EMCB** (GUOSMM-B-2026-001) — **EMCB institution of the Order**; domestic e-money chain only; **not DBIS.**
5. **DBIS** (GUOSMM-C-2026-001) — **Tripartite Sovereign Body** settling between **EMCBs and other central banks** within the **treatied nations of the Order**; completely apart from the OMNL chain. See `gazette/docs/MONETARY_ARCHITECTURE_CANONICAL_SCHEMA.md`.

**Canonical license identifiers** use the `-SHOSJJ-` suffix (e.g. `LICENSE-ZBANK-SHOSJJ-2026-001`). Fineract external IDs ending in `-OMNL` are operational routing aliases under OMNL supervision — not license issuance labels.

## Juridical form and seat

- **Legal form:** Order-chartered juridical person — supervised affiliate institution under OMNL head-office hierarchy.
- **Principal place of business:** Boulder, Colorado, United States of America (aligned with OMNL registered address for supervisory coherence).
- **Duration:** Perpetual unless revoked under Licensing Authority procedures.
- **Governing law:** Order law as published in GUOSMM.

## Dispute resolution and appeals

1. **Commercial and inter-institutional disputes** among Order-chartered parties arising under this Charter: **ICC Arbitration**, Paris seat, **ICC Rules in force at commencement of the arbitration**, English language, one arbitrator unless the amount in dispute exceeds USD 500,000,000 (three arbitrators). The arbitral award is final; enforcement follows the **New York Convention** where applicable.
2. **Licensing and prudential appeals** (suspension, revocation, fit-and-proper): administrative path under GUOSMM-A-2026-002 through the **SHOSJJ Licensing Authority** → Licensing Governance Board → Grand Chancellor; **judicial license appeals** per GUOSMM-A-2026-003 Article 6.2 (ICCC chamber rules).
3. **Forum separation:** licensing appeals do not stay commercial arbitration unless a final ICCC order expressly requires it under Order law.

## Track B / external transactability

External banking, insurance, money-transmission, and correspondent access in nation-state jurisdictions requires closure of Track B compliance matrices and program counsel sign-off. This instrument establishes **Order capacity and internal operations commencement** only.

## Supplemental activity separation

Base institution charters do **not** automatically authorize every adjacent financial, blockchain, exchange, custody, or market activity that an institution may wish to conduct.

Where an institution seeks to operate:

- a private or permissioned blockchain,
- a dedicated digital asset exchange,
- fiat conversion or FX desks,
- commodity or bullion exchange operations,
- securities or capital-markets programmes, or
- custody, nominee, escrow, safekeeping, or other ancillary regulated activities,

those activities must be covered by a **separate published add-on charter or license** with a distinct license identifier and explicit scope statement. The base charter remains the juridical anchor; the add-on publication defines the extra activity perimeter.

## Materiality controls (HO batch programme)

Interoffice allocations at or above **USD 100,000,000,000** per tranche, or cumulative HO batch programme materiality thresholds, require maker-checker control and, where applicable, second-reviewer approval before ledger posting.

## Nunc pro tunc ratification (operations commencement 2026-05-02)

Between **2 May 2026** and Tier 1 publication of this instrument, provisional operations were conducted under:

- **SHOSJJ Licensing Authority** interim programme authorization (GUOSMM-A-2026-002) and counsel resolutions (EV-003);
- OMNL head-office **prudential** supervision (GUOSMM-B-2026-001);
- HO batch programme authorization recorded in the OMNL Fineract office hierarchy (offices 29–32); and
- pending admission under GUOSMM-C-2026-001 Article 3 (Membership).

Forward-looking bounded digital operations: **GUOSMM-E-2026-003** (PDOA, SHOSJJ Licensing Authority).

Interim basis and evidence index: **GUOSMM-E-2026-002** (HO batch governance and interim operations notice).

Upon Tier 1 publication, operations **commencing 2 May 2026** are **ratified nunc pro tunc** to the extent consistent with this Charter and parent acts. **No retroactive claim** arises against external regulators, correspondents, or policyholders without separate Track B evidence and nation-state recognition.

## Suspension and revocation

Suspension or revocation follows the appeal path for the entity license class under **GUOSMM-A-2026-002** and **GUOSMM-A-2026-003** Article 6, through the **SHOSJJ Licensing Authority**, Licensing Governance Board, and Grand Chancellor as applicable.

## Counsel roles (program vs institutional)

| Role                         | Name                   | Scope                                                                                                                |
|------------------------------|------------------------|----------------------------------------------------------------------------------------------------------------------|
| <b>Program counsel</b>       | P.C. Walker, Esq.      | Publication readiness, prohibited-claims register, Track A/B gating attestation (GUOSMM-E-2026-002 counsel schedule) |
| <b>Institutional counsel</b> | David Eugene Ntshabele | Day-to-day charter interpretation, licensing conditions, external diligence responses (DBIS lane)                    |

Program counsel attestation does not substitute for institutional counsel on operational matters; neither attestation creates nation-state license equivalence.

## Governance and officers (HO batch pool)

Each HO batch institution is supervised by **OMNL** with a named **operations pool**:

| Role                                                             | Name                                               | Entity lane                          |
|------------------------------------------------------------------|----------------------------------------------------|--------------------------------------|
| <b>Banking and Compliance Officer</b><br>(prudential supervisor) | Romeo L. Miles                                     | OMNL (central bank)                  |
| <b>Operations pool</b>                                           | Adam Michaelson;<br>Bernard Niehaus; David Bullock | Officers Pool — shared maker-checker |

Material HO batch postings require at least **two distinct pool members** (maker + checker) and compliance oversight by the Banking and Compliance Officer or delegate. Full roster, entity liaisons, and fit-and-proper index: **GUOSMM-E-2026-002**.

## LEI and public identity

Each institution **shall obtain** a distinct **GLEIF-issued, active** Legal Entity Identifier separate from OMNL LEI 98450070C57395F6B906, with Level 1 relationship disclosure to OMNL, **before** Tier 2–5 external notice or correspondent KYB representation. Public designation names in this Charter do not substitute for domain registration, SOS name clearance, or external trademark clearance.

---

## Scope

Authorizes AnakaBank, under the umbrella of its base charter only, to operate a private or permissioned blockchain, including validator or node governance, institutional ledger administration, and controlled interoperability functions for admitted institutional counterparties.

## Restrictions

- No public-chain marketing as a nationally licensed exchange, bank, or payment system.
- No retail wallet issuance from this add-on alone.
- No host-state market access is implied by Order-law publication alone.

## Governance

This add-on remains subordinate to GUOSMM-C-2026-005, GUOSMM-A-2026-002, the shared charter terms, the HO batch supplemental licensing framework, and Track B host-state gating.

---

*Signing authority: Sovereign Military Order of Malta · Supplemental activity add-on under the HO batch framework*