



Presented by  
Jewelers Mutual Group | Jewelers Vigilance Committee

ANTI-MONEY-LAUNDERING  
(AML) PROGRAM

For

Charm America

641 W. Harvard Ave.

GLENDALE, CA 91204

For Fiscal Year

2024

# JewelPAC™

Presented by  
Jewelers Mutual Group | Jewelers Vigilance Committee

## ANTI-MONEY-LAUNDERING (AML) PROGRAM

For

Charm America

641 W. Harvard Ave.

GLENDALE, CA 91204

For Fiscal Year

2024

## ESTABLISHMENT OF CHARM AMERICA'S AML PROGRAM

Charm America ("The Company") has determined that under the Regulations issued by the U.S. Department of Treasury's Financial Crimes Enforcement Network ("FinCEN"), cf. 31 CFR Chapter X, under the Bank Secrecy Act as amended by the USA PATRIOT Act of 2001 (Public Law 107-56) ("The Regulations") our business is:

- A non-exempt Dealer – the Regulations require us to have an AML Program.
- A non-exempt Retailer – the Regulations require us to have an AML Program.
- Exempt, but we will voluntarily establish an AML Program to assist in protecting our business, our industry, and the US financial system.

The Company hereby establishes this written Anti-Money-Laundering (AML) Program to mitigate the risks of exploitation of the Company by anyone attempting to launder money or to finance terrorism (the "Risks") and to enact reasonable, appropriate, and effective counter-measures ("the Counter-Measures") and to conform with the Regulations.

The Company has determined that it is required under the Regulations to establish an AML Program (is non-exempt) or it has elected to establish an AML Program regardless of exemption status.

**While using compliance tools provided by the *JewelPAC* program, the Company understands that Charm America is *solely responsible* for establishing its AML Program and for keeping it appropriate, current, and effective.**

**The Company makes *itself* compliant with the Regulations. The *JewelPAC* program only *assists* the Company to do so.**

The Company will appoint a Compliance Officer who will supervise and maintain the effectiveness of all aspects of the Company's AML Program as required by the Regulations.

This AML Program (like the Regulations) applies only to transactions of Covered Goods. Covered Goods generally include precious metals, precious stones, jewels or finished goods – which may include coins, jewelry, art, or antiques. Company transactions, divisions, departments, or employees (if our business shall employ more than a single employee during the current fiscal year) which do not trade in Covered Goods are not subject to this AML Program.

## COMPLIANCE OFFICER APPOINTMENT

Adrine Andreasian is an employee the Company and is herewith appointed Compliance Officer to develop, implement, administer, update, monitor, and enforce the Company's AML Program

in compliance with the Regulations.

The duties and authorities of our Compliance Officer are:

1. To perform a Risk Assessment of the Company's current practices to determine the extent to which the Company may be vulnerable to abuse by those who aim to launder money or finance terrorism.
2. To develop, write, implement, administer, update, monitor and enforce the AML Program of the Company appropriate to the Company's circumstances.
3. To maintain current knowledge of all AML requirements in compliance with Section 352 of the USA PATRIOT Act and the Bank Secrecy Act.
4. To be familiar with all Treasury Forms relevant to enacting the Company's AML Program and to see that they are filed when appropriate.
5. To supervise and keep current the training of all appropriate personnel.
6. To review and determine the correct course of action for all suspicious activities observed or reported by employees (if our business shall employ more than a single employee in the current fiscal year).
7. To respond to inquiries from law enforcement agencies, such as the U.S. Treasury, about matters relating to the Company's AML Program.
8. To maintain current and comprehensive records of the Company's AML Program.
9. To appoint an Independent Tester of the Company's AML Program.
10. To ensure that the Independent Testing of the Company's AML Program occurs at appropriate intervals and that the recommendations for improvements to the Company's AML Program resulting from the Independent Testing are implemented effectively.

## **GOVERNING PRINCIPLES OF THE COMPANY'S AML PROGRAM**

The Regulations recognize that we are the experts in our industry and require that we make full and reasonable use of our knowledge of our industry to implement appropriate protections of our business, our industry, and the U.S. financial system against the Risks.

We will govern our business practices according to our conscientious assessment of the Risks as defined in the Regulations.

The Company may need to deploy more than the minimum Counter-Measures to address higher risks if we detect them.

The Company may trust in circumstances where we have a high degree of confidence that reasonable AML practices are in effect and may deploy correspondingly less-than-maximum Counter-Measures.

The Company will take reasonable and appropriate steps to verify that none of its customers or suppliers is engaged in activities that might threaten the integrity of the Company, of our industry, and of the United States' financial system.

This AML Program is established in part to help ensure that the Company and its employees (if our business shall employ more than a single employee during the current fiscal year) will be in compliance with the Regulations. The Company does not commit to any stricter measures than actually required by the Regulations as its legal obligation.

The Company will make this AML Program accessible to the U.S. Department of Treasury or any other authorized Federal Agency upon request.

The Company will make this AML Program accessible to its employees (if our business shall employ more than a single employee during the current fiscal year) upon request.

## **SCOPE OF THE COMPANY'S AML PROGRAM**

The Company requires all employees, managers, and principals (if our business shall employ more than a single employee during the current fiscal year) who are subject to the Regulations to read, understand, conform to and implement the policies of this AML Program.

Compliance with the Company's AML Program

Is

Is not

a condition of employment with the Company so that an employee shall be subject to disciplinary action for failure to comply (if our business shall employ more than a single employee during the current fiscal year).

The following is true about the Company's business operations under this AML Program:

This AML Program governs all our business operations.

This AML Program governs only the part of our business that trades in Covered Goods but does not govern other parts of our business that do not trade in Covered Goods.

We are a non-exempt Retailer and this AML Program governs only those transactions with non-exempt suppliers and does not govern our other transactions.

In defining a year's activities, this AML Program will use the FISCAL year on which the Company's accounting is based.

## **OBJECTIVE ASSESSMENT OF THE RISKS**

On January 26, 2024 the Company conducted a methodical analysis of its standard practices

and evaluated the extent to which they present vulnerability to the Risks.

The purpose of this exercise was to raise awareness of the Risks, thereby enabling the Company's Compliance Officer to develop reasonable, appropriate and effective Counter-Measures.

The process included scrutiny and evaluation of the Company's methods of transacting money, receiving and distributing Covered Goods, sources of supply, methods of "Knowing Your Customer (KYC)" and other factors relating to the Risks.

Each of the Company's standard practices was scored to assess whether it presented HIGH, MEDIUM or LOW Risks. The score for each practice was averaged to produce an Overall Risk Score was LOW.

## **POLICIES OF THE COMPANY**

The Company has determined that the following policies are appropriate to its business circumstances and therefore the governing policies of the Company are as follows:

1. Whenever a trading partner, transaction, market, or situation gives rise to suspicion with respect to the Risks, the Company may take additional precautions, including one or all of the following possibilities:
  - a. Obtain more complete identification or other information about the parties to a transaction,
  - b. Ask for verification that Customers or Suppliers are implementing their own AML program, and
  - c. Run a check against money laundering and terrorist financing watch lists.
2. The Company shall take advantage of its knowledge of longstanding customer and supply relationships and give less scrutiny to customers and suppliers we know and trust and who, to the best of our belief and knowledge, are compliant with the Regulations, unless new information comes to light that raises concerns.
3. The Company shall train all relevant employees (if our business shall employ more than a single employee during the current fiscal year) on the Regulations and on the Company's AML Program at yearly. Annually
4. The Company shall appoint an Independent Tester of the Company's AML Program, other than the Compliance Officer and other than persons directly responsible for implementing this AML Program. The Independent Tester shall periodically test that this AML Program is current, adequate, and effective.
5. The Company shall conduct the required Independent Testing of the Company's AML Program as deemed appropriate by the Compliance Officer at least : Annually.
6. The Company shall comply with all mandatory cash reporting requirements for cash

transactions of more than \$10,000, by filing IRS Form 8300 for each such transaction. This requires that any transaction (buying or selling) involving more than \$10,000 in cash (in a single transaction or related transactions) must be reported within 15 days. The IRS Form 8300 can be obtained on at <http://www.irs.gov/pub/irs-pdf/f8300.pdf>. Full instructions are on the form.

7. The Company shall make reasonable inquiries of any Suppliers or Customers who request an abnormal and unexplained alteration in the course of their dealings with the Company, such as:
  - a. Payments structured in peculiar ways, such as many payments in small amounts to pay for a single purchase;
  - b. Change of delivery or distribution methods;
  - c. Inclusion of previously unknown third parties in transactions;
  - d. Requests for an unusual degree of secrecy;
  - e. Requests to do business in ways that are unconventional or abnormal to the trade.
8. The Company shall cooperate with law enforcement agencies.
9. The Company shall submit all documents required by state or local law to the appropriate government agencies with respect to purchase of Covered Goods from Members of the Public.
10. The Company shall file the mandatory Department of the Treasury Form TD F 90-22.1 when opening any account with a foreign bank or other foreign financial institution with an aggregate balance over \$10,000. This form can be obtained at <http://www.irs.gov/pub/irs-pdf/f90221.pdf>. Full instructions are on the form.
11. The Company shall file the mandatory FinCEN Form 105 with respect to any international, physical transportation of currency with an aggregate value over \$10,000. This form can be obtained at [http://www.fincen.gov/forms/files/fin105\\_cmir.pdf](http://www.fincen.gov/forms/files/fin105_cmir.pdf). Full instructions are on the form.

## **ONGOING TRAINING**

The Company's Compliance Officer will list the employees and/or titles that must receive ongoing training in the Regulations in an Addendum attached to this AML Program (if our business shall employ more than a single employee during the current fiscal year). As each employee completes training, a certificate showing a passing grade for each training module will be added to the Company's AML Program file. The Compliance Officer will be responsible for ensuring that all employees who must train under the Regulations are current in fulfilling this requirement (if our business shall employ more than a single employee during the current fiscal year).

## INDEPENDENT TESTER APPOINTMENT

The Company's Compliance Officer herewith appoints

TBD

TBD

TBD, TBD TBD

TBD

as the Independent Tester of the Company's AML Program in compliance with the Regulations.

The Company will conduct an Independent Test of the Company's AML Program whenever the Company's Compliance Officer feels it is required, but at least at the following intervals:

- Annually
- Bi-annually
- Quarterly

The Company's Independent Tester shall:

1. Have access to The Company's Compliance Officer.
2. Be competent, knowledgeable, and current on all relevant AML requirements to comply with the Regulations.
3. Have access to the files and records of the Company's AML Program.
4. Maintain the Company's AML Program in a place available for inspection at one of the Company's locations in the USA.
5. Check that the Company is following its AML Program reasonably, appropriately, and effectively.

## THE COMPANY'S SOURCES OF SUPPLY

The Company's main sources of supply of Covered Goods are currently

- Wholesalers, dealers or manufacturers.
- Auctions
- Retailers
- The Public



- Estate Sales
- Bankruptcy Sales

The Company buys Covered Goods from the following jurisdictions (countries): USA.

The Company will consider its sources of supply in assessing Risks and developing Counter-Measures. The following are some of the Company's considerations:

1. When buying from a foreign supplier who has a U.S. office, the Company will prefer to place orders through the supplier's U.S. office, because those transactions will clearly be covered by U.S. Regulations.
2. The Company will consider that foreign suppliers may have U.S. offices or U.S. sales staff or may come to U.S. trade shows or similar events, which would make them subject to the Regulations.
3. U.S. Regulations can only govern those transactions under U.S. jurisdiction. If the Company buys directly from a foreign supplier outside the United States, those transactions or sources of supply might make closer scrutiny appropriate.
4. If a foreign supplier maintains an AML Program under the laws of its jurisdiction (country), or if the foreign supplier is of high reputation and has a long-standing relationship with the Company, these factors may present lower risks.
5. When buying from a foreign supplier – including at a U.S. trade show or similar event – the Company will scrutinize the transaction more carefully, which may include
  - a. obtaining further identification information;
  - b. requesting affirmation that the supplier is maintaining an AML Program appropriate to its jurisdiction; or
  - c. running a Denied Party Screening against money laundering and terrorist watch lists.

## **KYC: SUPPLIER DATABASE**

***KYC is the acronym commonly used for "Know Your Customer – or Supplier."***

The Company will request that Suppliers provide the Company with the following information for our Supplier Database:

- Business Name, Address, City, State, ZIP or Postal Code, Country and Telephone
- Business Tax ID Number
- Principal(s)' Name(s), Principal(s)' Address(es), City, State, ZIP or Postal Code, Country, and

Telephone

- Principal(s)' Social Security or other Tax ID Number(s)
- For all Suppliers.
- For all new Suppliers.
- Only for those Suppliers that the Company does not know well or whose activities give rise to questions, doubts, or suspicions.
- Never. The Company has elected not to use this KYC methodology.

## **KYC: CUSTOMER DATABASE**

The Company will request that Customers provide the Company with the following information for our Customer Database:

- Business Name, Address, City, State, ZIP or Postal Code, Country and Telephone
- Business Tax ID Number
- Principal(s)' Name(s), Principal(s)' Address(es), City, State, ZIP or Postal Code, Country, and Telephone
- Principal(s)' Social Security or other Tax ID Number(s)
- For all Customers.
- For all new Customers.
- Only for those Customers that the Company does not know well or whose activities give rise to questions, doubts, or suspicions.
- Never. The Company has elected not to use this KYC methodology.

## **KYC: CONFIRMING THE AML PROGRAMS OF SUPPLIERS**

The Company will request that Suppliers affirm that they are implementing an AML Program appropriate to US Regulations or to the AML Regulations required in their jurisdictions (countries) as follows:

- For all Suppliers.
- For all new Suppliers.

- Only when the Company does not already know the Supplier well or whenever questions, doubts, or suspicions arise concerning a Supplier.
- Never. The Company has elected not to use this KYC methodology.

## **KYC: CONFIRMING THE AML PROGRAMS OF CUSTOMERS**

The Company will request that Customers affirm that they are implementing an AML Program appropriate to US Regulations or to the AML Regulations required in their jurisdictions (countries) as follows:

- For all Customers.
- For all new Customers.
- Only when the Company does not already know the Customer well or whenever questions, doubts, or suspicions arise concerning a Customer.
- Never. The Company has elected not to use this KYC methodology.

## **KYC: USE OF DENIED PARTY SCREENING**

The Company may use Denied Party Screening (DPS) to check that the Company's Suppliers or Customers are not on Worldwide Government Watch Lists for Money-Laundering and Terrorist Activity or on a list of entities whose assets have been frozen by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC). OFAC issues the Specially Designated Nationals and Blocked Entities List (SDN List) of targeted countries, terrorists, drug cartels and other specially designated persons. Transactions with entire countries and companies in those countries can be banned by OFAC. Checking a name using Denied Party Screening Service (DPS) includes a check of OFAC lists. For specific instructions regarding what businesses may or may not do under OFAC regulations, the Company may refer to the OFAC website at [www.ustreas.gov/ofac](http://www.ustreas.gov/ofac).

## **KYC: DENIED PARTY SCREENING OF SUPPLIERS**

The Company has chosen to use Denied Party Screening on Suppliers as follows:

- On all Suppliers each year
- Only on new Suppliers
- On a certain percentage of our Suppliers each year, as a spot-checking technique.
- On Suppliers from whom we purchase more than an aggregate value of \$2,000 each year.

- Only when we do not have a long-standing relationship or close familiarity with a Supplier.
- Only when circumstances give rise to concerns, doubts or suspicions of Suppliers.
- Only on foreign Suppliers.
- Never. The Company has elected not to use this KYC methodology.

## **KYC: DENIED PARTY SCREENING OF CUSTOMERS**

The Company has chosen to use Denied Party Screening on Customers as follows:

- On all Customers each year
- Only on new Customers
- On a certain percentage of our Customers each year, as a spot check
- On Customers from whom we purchase more than an aggregate value of \$2,000 each year.
- On each Customer, but not more frequently than once per month and not if the Customer buys an aggregate value of less than \$2,000 in a single month.
- Only when we do not have a long-standing relationship or close familiarity with a Customer.
- Only when circumstances give rise to concerns, doubts or suspicions of Customers.
- Only on foreign Customers.
- Never. The Company has elected not to use this KYC methodology.

## **KYC: DENIED PARTY SCREENING OF MEMBERS OF THE PUBLIC**

The Company has chosen to use Denied Party Screening on Sellers who are Members of the Public as follows:

- On all Sellers who are Members of the Public each year
- On a certain percentage of Sellers who are Members of the Public each year, as a spot-checking technique.
- On Sellers who are Members of the Public from whom we purchase more than an aggregate value of \$2,000 each year.
- On each Seller who is Member of the Public, but not more frequently than once per month and

not if the Seller buys an aggregate value of less than \$2,000 in a single month.

- Only when we do not have a long-standing relationship or close familiarity with Sellers who are Members of the Public.
- Only when circumstances give rise to suspicions of Sellers who are Members of the Public.
- Only for foreign Sellers who are Members of the Public.
- Never. The Company has elected not to use this KYC methodology.
- Never. The Company never buys from Members of the Public.

## **TRANSACTION PRACTICES**

The Company also establishes the following policies about transactions:

1. If any Supplier or Customer asks to change his usual method of transacting business, including methods of payment, distribution, or delivery, the Company will instruct its Compliance Officer to make reasonable inquiries and assess the risk such requests may present.
2. When purchasing Covered Goods from individuals, the Company will make payments only to the person selling the Covered Goods and will not divert payments to any third person, unless the Company has verified the identity of the third person, including by running Denied Party Screening, and has verified a legitimate business purpose for paying the funds to the third person.
3. When paying money (as opposed to giving trade-in credit) to purchase Covered Goods from members of the public or from foreign sources of supply or from sellers whom the Company does not know well, the Company will make its best effort to verify the identity and safety of the seller, including by using Denied Party Screening.
4. When giving trade-in credit to a customer, the Company will not disburse cash or payment to a customer but will credit the amount to any current or future purchase of Covered Goods.
5. If cash or other payment is provided to a customer who sells Covered Goods to the Company, this will be entered in the Company's accounts as a purchase and will not be treated as a trade-in.

## **SUSPICIOUS TRANSACTIONS FACTORS**

The following are some factors which the Company believes represent suspicious activities and high-risk transactions that should be referred to the Compliance Officer:

1. Splitting a single large transaction into multiple payments, either at one time or over a

short interval, for the apparent purpose of making it seem on paper like multiple small transactions and in a way that may seek to evade transaction reporting requirements.

2. Using a combination of multiple payment methods, such as checks, cash, and wire transfers, to make a single purchase in a way that may seek to evade transaction reporting requirements.
3. *Unexplained* payment with sequentially numbered checks or money orders.
4. Payment for repeated transactions using travelers checks in large quantities.
5. Unexplained payments for Covered Goods from or to third parties for large transactions or repeated transactions in abnormal circumstances, particularly where third party payments come from or go to foreign parties. This might be means to evade transaction reporting requirements.
6. Unwillingness of a Supplier or Customer to give complete or accurate information to reasonable inquiries about identification or AML practices.
7. The request by a Supplier or Customer for an unusual degree of secrecy, such as requests that the Company refrain from recording details of transactions, asking that transactions take place “off the books” or without inventory entries in an abnormal manner, while recognizing that transactions of expensive merchandise are often treated as confidential in ways normal to the trade that are patently not suspicious.
8. Abnormal and unexplained changes in the methods, size, type, quantity, or frequency of transactions if the Company can determine that these are not part of the normal ebb and flow of business. For example, if the Company cannot reasonably know the pattern of “typical” transactions with a trading partner then the Company will be unable to notice any abnormal change from what would be typical. However, if a trading partner shows a fairly consistent pattern over time, then the Company might be able to notice an irregular deviation from the normal pattern. Furthermore, the simple business success of a trading partner in buying or selling more Covered Goods than in the past is not suspicious. The Company determines that only a radically different change would be suspicious, such as a retailer who for many years has purchased \$50,000 per year suddenly wanting to buy \$5 million of Covered Goods, combined with unusual transaction arrangements. Even so, if the Company inquires and obtains a reasonable explanation, this still might not be suspicious or high risk.
9. A Customer or Supplier who presents different identification for different transactions.
10. A Customer or Supplier who spells his/her name differently or uses a different name for different transactions.
11. A Customer who makes payment with multiple instruments (money orders, traveler’s checks, cashiers’ checks, foreign drafts) that appear to have been purchased in a “structured” manner – organized in a way to evade reporting and recordkeeping

requirements, such as in amounts just under \$10,000 (or other relevant threshold), or with sequential serial numbers, etc.

12. A Customer who claims not to have any local address, but appears to reside locally because he or she keeps returning to the Company over a period of time.
13. A legitimate ID that appears to have been altered.
14. An identification document in which the description of the individual does not match the customer's appearance (e.g. different age, height, eye color, sex), excluding of course changes in weight or natural results of aging.
15. A Customer or Supplier who is unwilling or unable to provide normal identification.
16. A Customer or Supplier who presents an unusual, suspicious or apparently fake identification document.

## **NORMAL TRANSACTION FACTORS**

The Company determines that normal transactions in its industry often involve very large dollar values of transactions and therefore

1. It is common to the industry to make installment payments by multiple and even sequential, post-dated checks for the purchase of Covered Goods on a single invoice in ways that are not designed to evade transaction reporting requirements but address the inability of the Customer to pay large sums up front.
2. Where money orders have a dollar limit, requiring the use of multiple money orders, this may be legitimate, if this is not an attempt to evade cash reporting requirements.
3. It is common for tourists to purchase jewelry. Thus, something more than a single shopping visit would be required to make a large transaction with traveler's checks suspicious or high risk. A second visit during a tourist trip might be explainable as well, although one might start to inquire about unexplained or unusually repeated visits purchasing with traveler's checks as this might be a ploy to evade transaction reporting requirements.
4. The use of large amounts of cash in a single transaction is not, by itself without any other red flags, abnormal or suspicious, although cash transactions over \$10,000 clearly require that the Company file a Cash Transaction Report, IRS Form 8300.
5. Transactions involving payments by third parties, without other red flags, may be normal in the industry and unless a third-party transaction is unexplained or unusual this alone would not necessarily be high risk or unusual.
6. Because of the risk of theft of valuable merchandise, a desire for secrecy is not unusual in our industry, including an understandable desire for purchasers not to advertise at which addresses burglars might find jewelry to steal. Jewelry is also often purchased to

surprise a loved one. And celebrities may also be wealthy enough to be common purchasers of Covered Goods while desiring privacy. Therefore, only abnormal refusal to answer reasonable questions would be suspicious.

7. An expired identification card or document is inappropriate, but not necessarily suspicious. The Company notes that under Treasury Department guidance expired documents can be accepted as part of a formal Customer Identification Program. An expired card or document calls for extra due diligence.
8. A Customer or Supplier who presents unfamiliar identification documents might not automatically be suspicious, because international Customers and Suppliers are normal in the industry. However, unusual documentation justifies extra due diligence.

## **FILING SUSPICIOUS ACTIVITY REPORTS**

The Company affirms that all employees (if our business shall employ more than a single employee during the current fiscal year) will refer suspicious activities to its Compliance Officer, who will assess the need to file a Suspicious Activity Report (SAR), Treasury Form TD F 90-22.56 (available at [http://www.fincen.gov/forms/files/f902256\\_sar-msb.pdf](http://www.fincen.gov/forms/files/f902256_sar-msb.pdf); full instructions are on the form).

The Compliance Officer will decide whether to refuse or delay suspicious transactions.

Suspicious activity is defined as any activity that any employee suspects may involve money from or for criminal activity or that seems to serve no legitimate business purpose or that lacks any reasonable explanation.

The Company's practice will be that if any Supplier or Customer refuses to answer reasonable inquiries in compliance with this AML Program the Company will strongly consider filing a SAR.

The Company will file a SAR when the Compliance Officer determines that a transaction is clearly suspicious and abnormal for the industry and if the amount exceeds \$2,000 in the aggregate.

A copy of all SARs filed will be kept by the Compliance Officer with the Company's other records of AML compliance.

## **RECORD KEEPING & RESPONSE TO INFORMATION REQUESTS**

The Company determines and affirms that its Compliance Officer will maintain all records associated with its AML Program for a period of five years. These records include evidence of the Company's compliance with the FinCEN Regulations, including any suspicious activity reports and supporting documentation, and records that the Company has obtained identification for customers and suppliers.

The Company will refer all requests for information regarding its AML Program from the U.S. Department of Treasury or any other duly authorized government agency to its Compliance



Officer, who will supervise and carry out the appropriate response.

## APPROVAL

This AML Program has been reviewed and approved by the Senior Executive Management of the Company, who deems its Counter-Measures appropriate to the Company's Risks.


All affected employees (if our business shall employ more than a single employee during the current fiscal year) of the Company have read and reviewed this AML Program and its Policies.

Signed:  \_\_\_\_\_ Date: 1/29/2024

Adrine Andreasian

COMPLIANCE OFFICER

Charm America

Signed:  \_\_\_\_\_

Sarkis Andreasian

CEO

INDIVIDUAL APPOINTING COMPLIANCE OFFICER

Charm America