

Executive Summary

Moonrail Limited BV (hereinafter referred to as “the Company” or “Moonrail”) is a well-established online gaming operator incorporated and licensed in Curaçao. The Company operates CSGOEmpire, a leading online gaming platform specializing in Counter-Strike: Global Offensive (CS:GO) skin-based trading and casino entertainment.

Founded in 2018, CSGOEmpire has achieved substantial global market penetration within the esports gaming community, gaining a reputation for operational integrity, technical innovation, and responsible gaming practices. The platform serves a diverse international audience while maintaining strict adherence to jurisdictional restrictions and regulatory requirements.

Business Objectives

- Maintain operational profitability and financial sustainability
- Invest in technological innovation, security, and scalability
- Ensure full compliance with Curaçao Gaming Authority regulations
- Strengthen player protection and responsible gambling initiatives

Company Management Structure

Moonrail Limited BV operates under a transparent corporate structure. All gaming activities are conducted directly by Moonrail Limited BV under its licensed authority.

The Company’s governance model provides a clear separation of strategic oversight and operational execution. The Board of Directors ensures proper governance, while the executive management oversees daily operations, compliance, and strategic development.

Key Management Team

- Irene Rosenblatt (CEO): A strategic and results-driven CEO with extensive experience in leading teams across diverse industries. Responsible for the company’s overall strategic vision and direction.
- Matt Tanner (CFO): Chartered accountant with over a decade of experience withing Big 4, consulting in high-growth startups in fintech, digital assets and AI industries. Responsible for all financial operations, including reporting, reconciliations, and payroll.

- Sampsa Saarela (CTO): Developer with nearly 20 years of experience in C-level management roles across various projects. Leads development and data teams, overseeing platform infrastructure and innovation.
- Rokas Daugirdas (Compliance Manager/Officer): Specialist with nearly 10 years of experience in the compliance field. Responsible for compliance, regulatory relations, and internal audits.

Positions to be Filled

- Risk Manager

Platform Overview

CSGOEmpire operates as an online gaming platform focused on CS:GO virtual item wagering combined with traditional casino-style entertainment. Registered users can participate using CS:GO skins—virtual in-game assets with real-world value—or through cryptocurrency deposits.

The business model is built on providing a secure, transparent, and engaging gaming experience that appeals to esports enthusiasts while maintaining regulatory compliance and responsible gaming standards.

Gaming Products

- Roulette: Classic casino-style roulette with CS:GO skin wagering
- Coinflip: Peer-to-peer binary outcome wagering
- Match Betting: Wagering on professional CS:GO esports matches
- Casino Games: Traditional casino offerings including slots, blackjack, and table games
- Custom Proprietary Games: In-house developed games designed to enhance player engagement

Reporting and Governance Structure

Moonrail maintains clearly defined reporting lines to ensure accountability and effective escalation in all operational and compliance-related matters.

Business Forecast and Growth Strategy

As a profitable and stable operator, Moonrail plans to expand into new markets while deepening its presence in core regions across Latin America and Asia.

Growth Strategy

- **Affiliate & Influencer Engagement:** Expand marketing partnerships, focusing on esports streamers and social media influencers.
- **Esports Sponsorships:** Invest in sponsorships with teams and tournaments to enhance brand visibility.
- **Strategic Acquisitions:** Explore mergers, acquisitions, and joint ventures that align with the Company's long-term strategy.
- **Product Innovation:** Continue rapid platform development through new games, personalized features, and gamification.
- **Payment Optimization:** Integrate localized payment solutions to improve user experience and trust.

Sustainability and Compliance

Moonrail is committed to long-term sustainability through responsible gambling, player protection, and compliance with international standards on fraud prevention, anti-money laundering (AML), and customer due diligence (CDD).

Key Suppliers

Moonrail partners with reputable and regulated third-party service providers to ensure operational efficiency, reliability, and compliance:

- **Betting Odds Provider:** Betby (licensed sports betting data integration)
- **Banking Services:** Zen, iSX (institutional banking and settlements)
- **Risk Management:** Seon (anti-fraud detection and prevention)
- **Compliance Technology:** CheckIn (CDD and identity verification), Chainalysis (blockchain transaction monitoring and AML)

All vendors are carefully vetted for technical quality, compliance, and regulatory reputation.

Hosting Infrastructure

To ensure maximum reliability, scalability, and security, Moonrail utilizes enterprise-grade cloud infrastructure:

- **Primary Hosting:** Amazon Web Services (AWS) – multi-region deployment for redundancy

- Content Delivery Network: Cloudflare – global edge network for optimized performance and DDoS protection
- Email Services: Google Workspace – secure corporate communications

Risk Management

The Risk Manager oversees the Company's Risk Management Framework, ensuring early identification, mitigation, and response to operational and regulatory risks.

Operational Risks

- System or software failures causing downtime
- Cybersecurity breaches compromising data or funds
- Payment gateway interruptions impacting cash flow
- Regulatory non-compliance resulting in sanctions

Market Risks

- Regulatory changes increasing compliance burden
- Competitive market pressure from new entrants
- Reputational damage impacting user retention

Financial Risks

- Foreign exchange and cryptocurrency volatility
- Liquidity shortfalls impacting operations
- Internal or external fraud incidents

Strategic Risks

- Technological obsolescence requiring major reinvestment
- Market demand shifts within the esports and gaming sector

Legal and Compliance Risks

- Intellectual property infringement (third-party or internal)
- Non-compliance with data protection regulations (e.g., GDPR)

Environmental and Social Risks

- Responsible gambling failures leading to user harm or sanctions
- Insufficient ESG initiatives impacting corporate reputation

Legal and Governance Framework

The Board of Directors is Xecutive Corporate Management B.V, who act in alignment with the Founder's strategic vision.

Pearl Reiph serves as the Money Laundering Reporting Officer (MLRO).

The CEO manages daily operations and reports directly to the Board.

Decision-Making Process

Moonrail fosters an open organizational culture encouraging staff to contribute ideas.

All significant operational or regulatory changes are reviewed by the CEO and, where necessary, approved by the Board of Directors before implementation by department heads.

Key Performance Indicators (KPIs)

Moonrail measures success through the following KPIs:

- Total Amounts Bet
- Total Skins Traded
- Monthly Active Users (MAU)
- User Acquisition Cost (UAC)
- Customer Lifetime Value (CLV)
- Retention Rate

Policies and Procedures

Moonrail maintains comprehensive internal policies aligned with regulatory standards:

- Anti-Money Laundering (AML) Policy
- Responsible Gaming Policy
- Information Security and Incident Management Policy
- Market Access Restriction Policy

Moonrail Financial Forecast (3 years)

Category	FY2025	FY2026	FY2027
Gross Gaming Revenue (GGR)	151,785,380.26	172,351,684.55	218,700,727.57
Net Gaming Revenue (NGR)	95,614,245.21	128,771,770.67	159,809,374.94
Operating Expenses:			
- Platform Maintenance & Development	13,572,012.00	14,250,612.60	14,963,143.23
- Marketing & Affiliates	1,710,000.00	1,795,500.00	1,885,275.00
- Staff & Management Costs	4,572,768.00	4,801,406.40	5,041,476.72

- Compliance & Licensing Fees	600,000.00	630,000.00	661,500.00
- Legal, Accounting & Audit	467,592.00	490,971.60	515,520.18
EBITDA (Operating Profit)	74,691,873.21	106,803,280.07	136,742,459.81
Depreciation & Amortization	7,259.05	5,095.13	3,576.27
Net Profit Before Tax	74,684,614.16	106,798,184.94	136,738,883.54