

Checklist for OGL/2024/1288/0542 (Novi B.V.) 1-Oct-24

License Conditions

How to Manage Requests:

View Details: Click on each request to see its details.

Add a Note (Optional): You can optionally, or when required, add a reply note to the request.

Close Request: Once you have completed a request, click the "Close" button under each request to close it.

01

Overdue 25/09/2024 Criticality 9 Miscellaneous Question Pending Review

License Condition

Instruction

The applicant to confirm whether it will still operate under its sub-license and if so the rationale of the division of the business.

Close this issue

Reply:

GCB: please clarify this item. The sub-license has expired as per August 18th

[Close](#) [Update](#)

02

Overdue 25/09/2024 Criticality 9 Website Question Pending Review

License Condition

Instruction

The applicant to confirm and demonstrate to the GCB in its live (non-test) site that it excludes play from the US, the Netherlands and sanctioned countries.

Close this issue

Reply:

Screenshot samples have been uploaded under Extra documentation as per your request, IP addresses from NL and USA. GCB may also double-check this via VPN. We are open to provide any other suggested method. Plus, players are not able to register from these countries. This can be seen if any GCB member tries to register from restricted countries.

[Close](#) [Update](#)

03

Due by 02/10/2024 Criticality 8 Miscellaneous Player Funds Pending Review

License Condition

Instruction

The applicant to demonstrate to the GCB how it intends to comply with the general license condition to segregate customer monies.

Close this issue

Reply:

See the Segregated Customer Money Policy, uploaded under Extra Documentation. Please advise if this policy meets GCB requirements.

[Close](#) [Update](#)

04

Due by 02/10/2024 Criticality 8 Miscellaneous Source of Wealth Pending Review

License Condition

Instruction

The applicant is not permitted to go live under the GCB license unless (i) it has answered the outstanding ticket relating to SOW for the business with a clear reconciliation to its proposed business plan's operational costs and the cash needs of the business together with an explanation as to how the UBO funded the purchase of Anatolian Ltd B.V. (and the purchase price) and how he intends to also meet its cash needs simultaneously; and (ii) the GCB has confirmed to the applicant that it is satisfied with the answers provided.

Close this issue

Reply:

As outlined in the business forecast submitted for Novi B.V., we expect to generate a steady revenue stream from our operations within Novi B.V. This revenue will be progressively reinvested into the business to cover operational costs.

For Anatolian B.V., this company has been acquired by Fikri Sunal for 1 USD as the company was not profitable, thus the value. This has been approved in April and declaration of such has been submitted to GCB too.

Please confirm.

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05

Due by 09/10/2024 Criticality 7 Miscellaneous Question Pending Review

License Condition

Instruction

The applicant to answer/act upon all outstanding tickets (insofar as it/they have not been answered by way of the above condition)

Close this issue

Reply:

Noted

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06

Due by 09/10/2024 Criticality 7 Miscellaneous Question Pending Review

License Condition

Instruction

The applicant to provide evidence of the UBO's ID as referenced on his criminal records check.

Close this issue

Reply:

You can optionally add a reply note to the request.

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07

Due by 16/10/2024 Criticality 6 Personal History Disclosure Form Question Pending Review

License Condition

Instruction

The applicant to upload PHDFs for the acting CFO and CTO.

Close this issue

Reply:

We indicated in the business plan that tech services are being provided by third party supplier legal entities. As such the Personal History Disclosure forms are not applicable as they are legal entities.

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08

Due by 16/10/2024 Criticality 6 Financial Provisions Financial Audit Pending Review

License Condition

Instruction

The applicant to provide management accounts for FSM 2024.

Close this issue

Reply:

As FS 2023 needs to be filed by December 31, 2024 for all Curacao entities, the FS 2023 are not yet available. We expect to provide them in the course of this month. The FSM 2024 are not yet available.

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09

Due by 06/11/2024 Criticality 3 Compliance Question Pending Review

License Condition

Instruction

The applicant to provide the GCB with its crypto risk management policies and if it intends to accept currencies other than USDT.

Close this issue

Reply:

USDT is the only currency being accepted. Please confirm if a policy will still need to be drawn up.

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10

Due by 04/12/2024 Criticality 1 Anti Money Laundering Question Pending Review

License Condition

Instruction

The applicant must bring its AML policies in line with Curacao law obligations.

Close this issue

Reply:

Client is working on the policies to ensure all is complied with in line with Curacao laws.

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