

		Location	Checked	Instructions	Comments
cs	Corporate Structure				B2B
1.	Start up / New company	BP/Internet/ Application Part 7	Y	<i>Check whether the company is live under Curacao.</i>	29.10.2025
	Existing operating company holding sub license	BP/Internet/ Application Part 7	Y	<i>Check whether the company is live under Curacao. If you notice that the company is Tier 1 (known) company please make a note.</i>	N/A

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	GoAML				BCIF: Yes Uncertified FIU screen shot submitted
	Check if any person is already approved under other applications. If missing information check Business Plan and Q 12 BCIF		Y	<i>List Approved People with their QPATE</i>	Claire Godschalk as rep of IGA Trust CO: Angeline Hassan sits on 3 applications as CO UBO/CEO: Thi Thuy Nguyen BCIF and business plan align
e	Updated company structure diagram showing equity and control percentages, signed by a company director of the applicant company.	BCI 10.1	Y	<i>Must be dated within the last 3 months of submission. Check Director with submission CS.3</i>	Yes
CS.1.3	Shows Control Percentage		Y		Yes
CS.1.4	Equity Adds Up		Y	<i>Remark if there are minority shareholders.</i>	yes
CS.2.1	Share ledger of the applicant company including companies holding 10% or more shareholding in the applicant company and all persons holding 10% or more shareholding in the applicant company. (Ultimate Beneficiary Owners) or trust deed.	BCI 10.2	Y	<i>Make sure share ledger lists all involved parties . Request trust deed.</i>	Yes

					Location	Checked	Instructions	Comments												
	Calculate all percentages equal to or more to ten percent.					Y		Yes												
	List all Companies in Share Ledger of the applicant company					Y														
	% share	Company Name.	Company Reg. No	Country	BCI 10.2	Y	List all companies having 10% or more shareholding here. If no companies are involved then delete this section.	NA												
						Y														
CS 2.2	External Sources Verification	<table border="1"> <tr><td>NorthData</td><td></td></tr> <tr><td>ICIJ</td><td></td></tr> <tr><td>Lexis Nexis</td><td></td></tr> <tr><td>AMLRISK</td><td></td></tr> <tr><td>LinkedIn</td><td></td></tr> <tr><td>Address (Google Maps)</td><td></td></tr> </table>			NorthData		ICIJ		Lexis Nexis		AMLRISK		LinkedIn		Address (Google Maps)				Using the external reference sources to verify company structure. Use country specific company registries to trace more information on the company.	
NorthData																				
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Lexis Nexis																				
AMLRISK																				
LinkedIn																				
Address (Google Maps)																				
CS.2.3	List all persons in Share Ledger over 10% -				BCI 10.2	Y	There has to be at least one UBO. All UBOs of companies with controlling interest must be listed. This section is linked to BC.													
	Company Belonging to:	Full Name	Passport Number	Country of Issue																
100	Trend Tree BV	Thi Thuy Nguyen	K0541335	Vietnam		Y		Declared to be self employed as a gaming consultant. Declared to be a consultant and BDO of Arrow Wood NV. Declared an annual income of USD 110,000 and a net worth of USD 250,000 acquired though savings from employment income												

					Location	Checked	Instructions	Comments
								and other professional income. Submitted: A certified bank statement with a balance of VND 406,010,586 as at 12.2.2026 A certified consultancy agreement with Arrow Wood NV, dated, 12.12.23, with an annual fee of USD 150,000, excluding bonuses A certified Jetonbank statement, showing a balance of USD TRC20 151,500 as at 25.3.2026 A self attested SOW/F declaration, stating income is derived from employment/professional income from Arrow Wood NV and Noble Aeronautica in Dubai, and that \$150,000 will be invested into the company

			Location	Checked	Instructions	Comments
	External Sources Verification	NorthData	X		Using the external reference sources to verify company UBO are involved in other gaming companies or business. Also remark if we suspect that this is a shadow UBO.	LN searches done on the applicant company, arrow wood and noble aeronautica : N/A The name and similar variations are extremely popular on OSM and north data with multiple results, unable to be verified. To rely on more reliable data such as LN searches on individuals.
		ICIJ	X			
		PRADO				
		Lexis Nexis				
		AMLRISK	x			
		LinkedIn	-			
		Onfido				
		Address (Google Maps)				
2.4	SOW declaration including supporting documents		Check question 1	Y	Insufficient documentation – send a ticket	BCIF 11: Loans by the shareholders in the amount of \$150,000 BCIF 9: Applicant holds a USDT Virtual Wallet An interest free loan between the UBO as lender and the applicant company, dated 4.2.2026, for the amount of \$150,000, denominated in USTD 150,000 with a maturity period of 48 months The Business plan has a 3 year financial projection

					Location	Checked	Instructions	Comments
								from 2025-2028. In ,026, it foresees, in the first year, (month 12 of operations a GGR of 3,984,268 , with a turnover of 1,155,375 and expenses of 519,529, resulting in a net profit of 635,846,
	SOF for new companies and reactivating companies					Y	<i>In the event of insufficient funding a ticket is sent for clarification.</i>	
	Verify objects of the company are for gaming				AI	Y		Yes
	Certificate of Good Standing (for tax purposes)						\	Yes.
	Ensure board management requirements are met					Y	<i>Check voting rights and appointment.</i>	Yes. One or more A Directors , and may have B directors
CS 3.4	Articles of .Incorporation of companies holding 10% or more shareholding in the applicant company:					Y		
	%	Company Name	Company Reg. No	Country	BCI 10.3	Y	<i>Replicate 3.4. and 3.4.1 for every company</i>	
						Y		

							Location	Checked	Instructions	Comments														
CS 3.4.1	External Sources Verification	<table border="1"> <tr><td>NorthData</td><td></td></tr> <tr><td>ICIJ</td><td></td></tr> <tr><td>PRADO</td><td></td></tr> <tr><td>Lexis Nexis</td><td></td></tr> <tr><td>AMLRISK</td><td></td></tr> <tr><td>LinkedIn</td><td></td></tr> <tr><td>Address (Google Maps)</td><td></td></tr> </table>					NorthData		ICIJ		PRADO		Lexis Nexis		AMLRISK		LinkedIn		Address (Google Maps)				For each company verify links and registrations	
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AMLRISK																								
LinkedIn																								
Address (Google Maps)																								
CS.4.1	Directors list for the applicant company including companies holding 10% or more shareholding in the applicant company.						BCI 10.3																	
	Company	VP	ST	Full Name	Passport Number	Country of Issue	AI		Lis all Directors. Check VP if director has voting powers. ST if it has statutory powers. Check with CS 3.4 above															
								Y																
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CS.4.2	Managing Directors as Official Representatives						BCI 10.3																	
	Trust Company	Full Name			Passport Number		AI		List all Managing Directors. Check VP. Must at least have one.															
	IGA Trust BV				Co Reg 154605			Y		Sole director Verified www2.curacao-chamber.com/excerpt.asp														

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