



GAMBLE



CITY



Business Plan

MOA Communications B.V.

Gamble City



Table of Contents

Business Plan.....	3
I- Scope.....	3
Our Mission.....	3
Our Key Points	3
II- Company Description	5
Company Background	5
Company Structure	5
Overview of the Industry and Positioning	7
Target Markets.....	7
Market Trends.....	8
Competitors	8
SWOT Analysis	9
IV- Marketing Plan	10
Online Advertising.....	10
Customer Acquisition.....	10
Customer Support.....	10
V- Legal.....	Error! Bookmark not defined.
Regulatory Compliance.....	Error! Bookmark not defined.
Terms & Conditions	10
Risk Evaluation	10
VI- Overview of the products.....	11
Services offered	11
Revenue Model.....	11
VII- Financial Projections	12



GAMBLE CITY

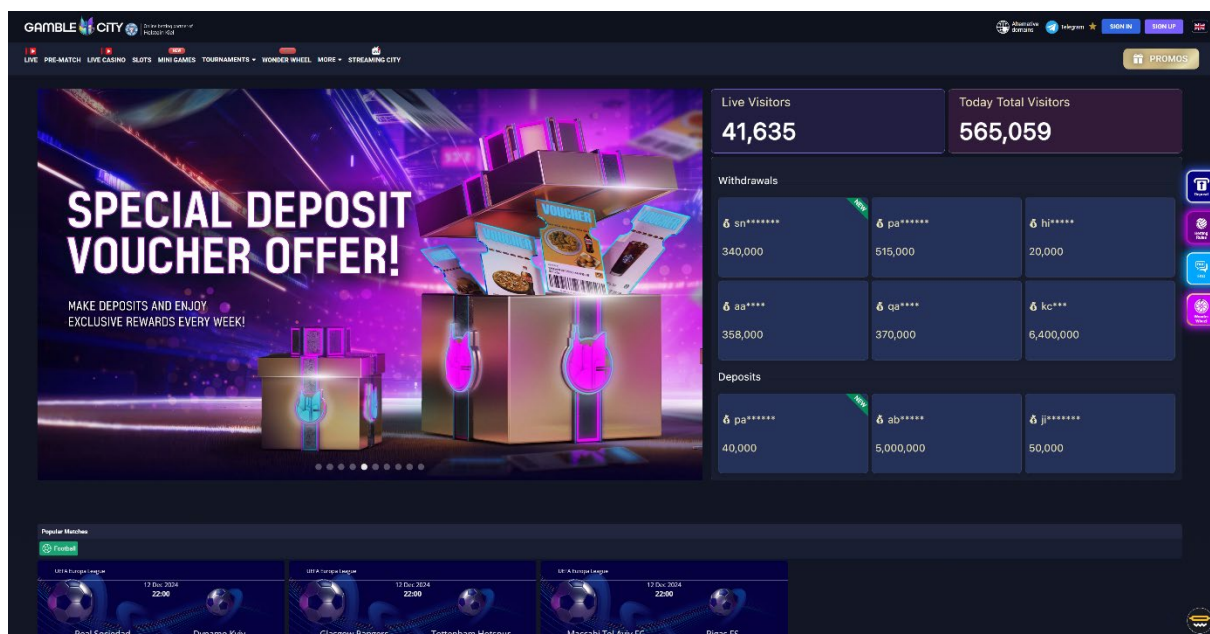


Business Plan

I- Scope

Our Mission

The company has developed a unique and user-friendly website, namely Gamble City (gb.city and gamblecity.com) with other sites possibly coming soon. The site is built on a fresh, lightweight platform that loads quickly and is fully adaptable to desktop.



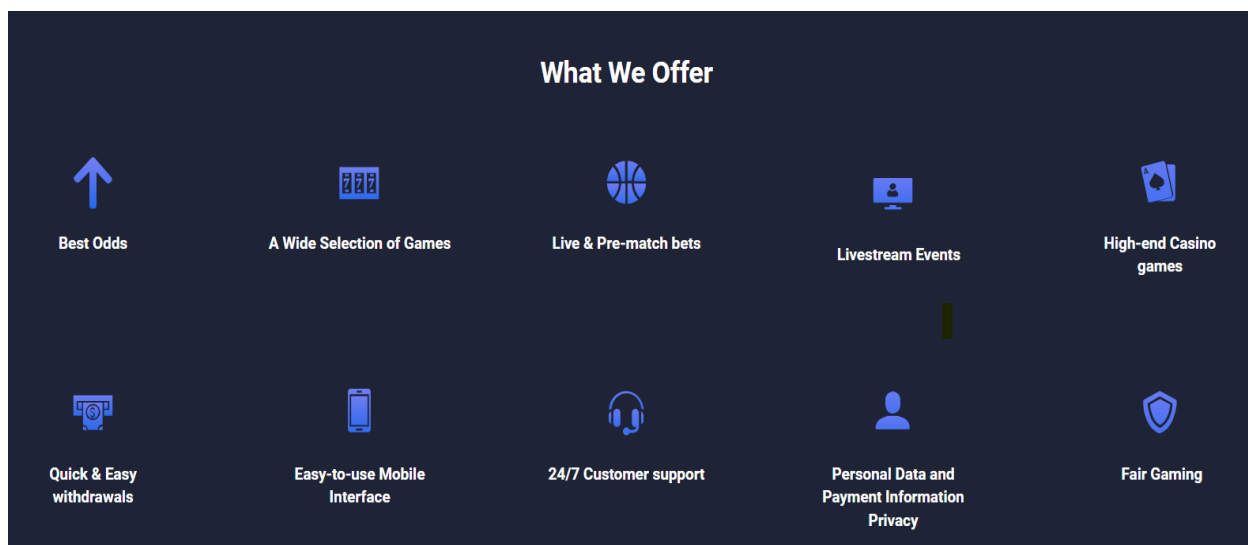
To align with the company's strategy of reaching a global audience, the site will be available in three languages and will fully support all financial transactions and gaming activities in multiple currencies. Gamble City is an official sportsbook and casino service, offering a diverse selection of live casino games and thousands of sports events from around the world to bet on.



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The company has partnered with leading payment gateways in the industry, enabling it to offer a variety of payment options. This allows customers to deposit and withdraw using their local payment methods and preferred currencies.

With the support of these payment providers, the company can process global transactions through Visa and MasterCard debit and credit cards, e-wallets (such as SafeCharge, Skrill, Neteller, MuchBetter, etc.), and cryptocurrencies like Bitcoin and Ethereum.

Our Key Points

- **Regulatory Excellence:** We will commit to ensuring the highest standards of regulatory compliance to provide a safe, efficient, and fair gaming environment. We will also guarantee the development and implementation of regulatory frameworks, guidelines, procedures, and policies that are effective, transparent, and in line with the needs of stakeholders.
- **Diverse Gaming Offer:** We aim to offer a wide range of online gaming services, including casino games, sports betting, poker, and live casino games.
- **Experienced Management:** Our management team brings years of collective experience in the iGaming industry.



II- Company Description

Company Background

MOA Communications B.V. has been operating successfully for several years under a Curacao sub-license, and Gamble City has become a well-established brand. Our goal is to continue expanding and evolving under the regulatory oversight and guidance of the Curacao Gaming Control Board.

Company Structure

UBO / CEO

The UBO and/or CEO holds a multifaceted and strategic role in the company. Responsible for steering the company toward success, the UBO and/or CEO combines vision, leadership, and adaptability to navigate the complexities unique to online gaming.

Key Responsibilities:

Vision and Strategy: The UBO and/or CEO defines the company's vision and strategic direction, anticipating market trends, understanding player behavior, and crafting plans to stay ahead in a competitive landscape.

Leadership and Team Management: Effective leadership is essential for creating a cohesive and motivated team. The UBO and/or CEO will inspire innovation, creativity, and excellence, recognizing that the collective talent and expertise of the team are key assets to the company's success.

Regulatory Compliance: Navigating both global and local regulations is a critical responsibility of the UBO and/or CEO. Staying informed about legal frameworks, licensing requirements, and compliance standards ensures the company operates ethically and within legal boundaries.

Technological Innovation: Embracing and driving technological advancements is vital in the iGaming sector. The UBO and/or CEO will focus on fostering innovation, staying up-to-date with emerging technologies such as blockchain, artificial intelligence, and virtual reality to enhance the gaming experience and maintain a competitive advantage.

Risk Management: Given the dynamic nature of the industry, the UBO and/or CEO will implement robust risk management strategies to protect the company's assets and ensure operational resilience.

Stakeholder Relations: Building and maintaining strong relationships with stakeholders—including investors, regulators, and business partners—will be a key focus for the UBO and/or CEO, ensuring alignment and long-term success for the company.



Compliance Officer

The Compliance Officer will be fully conversant with local Gaming & AML legislation. As well as the regulatory framework in Curacao. The official undertaking of the compliance function shall be appointed and approved pre-licensing. The compliance officer shall be a senior officer of the company, with direct reporting lines to the UBO.

Compliance Officer responsibilities include:

To represent the licensee and act as the primary point of contact with regulatory Authorities.

To directly oversee the licensee's operations and compliance with the law on a day-to-day basis.

To be fully aware of its operations and to be able to answer questions about it in the event of requests from Authorities.

To ensure the gambling systems work, and that he or she has full access to them.

To ensure the licensee's tax is paid on time and in full.

To submit the following in a timely manner, and regulatory reporting requirements:

To assist in the certification, investigation, and enforcement process.

Ensure the company follows financial laws, particularly regarding money laundering.

AML Department

The AML Department shall be a team of reliable and positive individuals with a passion for operations, specializing in risk and fraud, AML and RG procedures. They will also have experience in most instances related to the field, such as Chargebacks, lost transactions, KYC's, but with a real passion within the AML and RG fields. The AML Officer in charge shall be a senior officer of the company, with direct reporting lines to the UBP/CEO.

The responsibilities include, but are not limited to:

Prepare and maintain sound AML procedures.

Conduct risk assessments.

Conduct Enhanced due diligence.

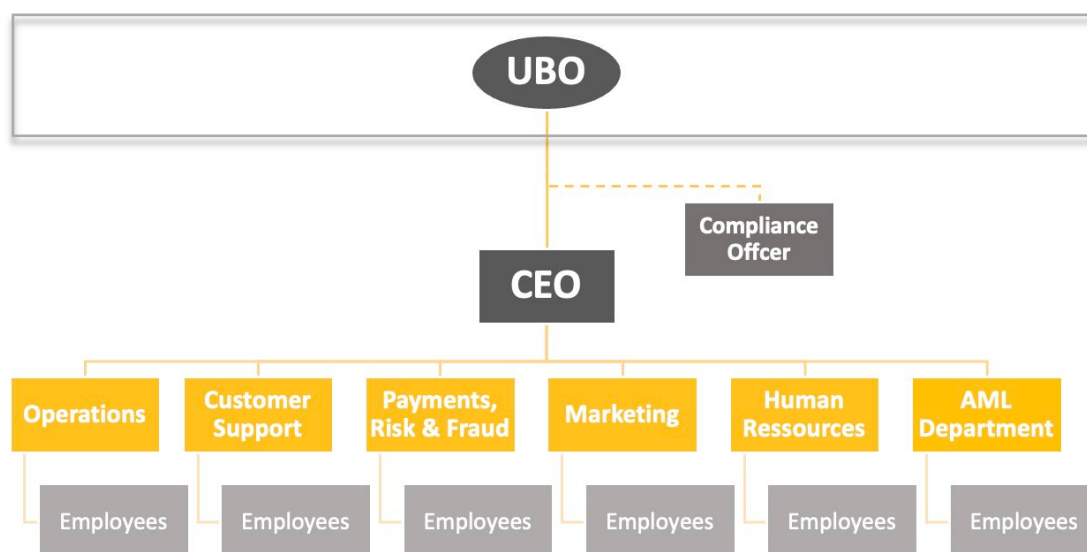
File Suspicious Activity Reports (SARs) and/or Suspicious Transaction Reports (STRs)

Ensuring that the staff is properly trained to detect money laundering.

Carry out activities to detect placement (physically placing bulk cash proceeds), layering (separating the proceeds of criminal activity from their origins through layers of complex financial transactions), and integration (providing an apparently legitimate explanation for the illicit proceeds).

Following and implementing company policies in relation to anti-money laundering

Reporting to the Board and following up on matters with the FIAU.



Overview of the Industry and Positioning

The digital gaming sector in Curacao is thriving, attracting players seeking diverse, secure, and engaging gaming experiences. The market is witnessing growing interest in online gaming across all age groups.

Our goal is to offer our registered players a variety of online virtual casinos and live casino experiences. While our offering will align with that of existing market operators, we aim to differentiate ourselves through a unique approach. We prioritize Responsible Gaming, offer competitive Return to Player (RTP) rates, ensure fast payouts, and deliver exceptional service to our players.

Recognizing the immense potential of this rapidly growing market, we are committed to evolving alongside it. Our vision is to become a leading operator in the industry, making a significant contribution to the market's future growth.

Target Markets

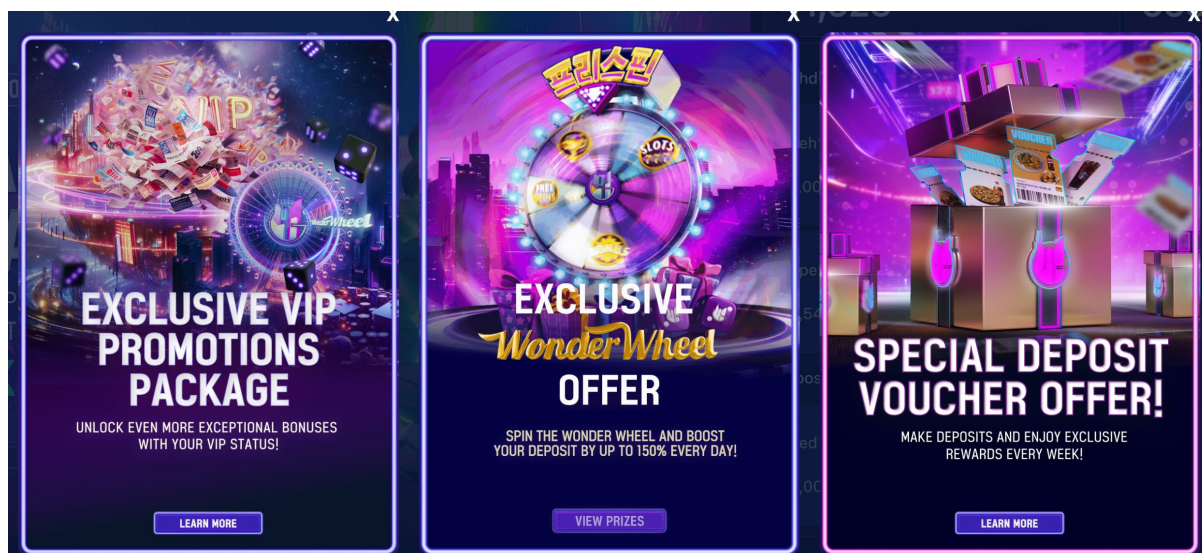
Due to increased local regulation requirements within Europe, the company will focus on countries outside of Europe, and within Europe where still possible.

The target markets therefore include:

- Non-regulated countries within Europe, such as Finland and Ireland
- Latin America
- New Zealand
- Canada
- India and South East Asia



Marketing



The Internal Marketing Team will be responsible for engaging with existing customers and ensuring their continued enjoyment of the site. The team will run both ongoing and one-off promotions to encourage repeat visits. These promotions will be communicated to customers through email, SMS, and the Promotions page on the site.

Competitors

Direct competitors are expected to include new brands launching in the latter part of 2024 and into 2025. Given the fast-paced nature of the industry, identifying a direct competitor is challenging. However, the online gaming market is broad, with healthy and encouraging growth. This expansion creates an increase in potential customers, providing us with a strong opportunity to build a loyal player base and continue growing our brand.

We believe our offering should be competitive—if not superior—to what is currently available. Our strategy is built on our expertise in providing players with the services they enjoy, offering quick transactions (both deposits and withdrawals), and providing an attractive Welcome Offer to incentivize new players.



SWOT Analysis

Strengths:

- **Established Brand:** Gamble City is a well-recognized brand with a loyal customer base, providing a strong foundation for continued growth.
- **Technical Infrastructure:** The casino operates on a robust and secure online platform that ensures a smooth, reliable gaming experience for users.
- **Game Variety:** A diverse range of games caters to different player preferences, appealing to a broad audience.
- **Customer Service:** Strong customer support allows for quick resolution of issues, enhancing customer satisfaction and loyalty.

Weaknesses:

- **Regulatory Challenges:** The constantly evolving and complex nature of online gaming regulations can present operational difficulties and compliance risks.
- **Dependence on Technology:** Technical issues or downtime could significantly disrupt user experience and damage the casino's reputation.
- **Intense Competition:** The online casino market is highly competitive, with numerous operators offering similar services, making differentiation and market share growth challenging.

Opportunities:

- **Market Growth:** The rapidly expanding online gaming market presents significant opportunities for business expansion and attracting new players.
- **Technological Advancements:** Innovations like virtual reality, blockchain, and AI could revolutionize the gaming experience, offering new ways to engage players.
- **Partnerships:** Forming strategic partnerships with other businesses—such as sports teams, entertainment companies, or tech firms—could help to attract new customers and expand brand reach.

Threats:

- **Regulatory Changes:** Shifts in gambling laws or regulations in key markets could negatively impact operations or require costly adjustments to compliance strategies.
- **Cybersecurity Risks:** Online platforms are vulnerable to cyber-attacks, which could result in data breaches, financial losses, or damage to customer trust.
- **Competitive Pressure:** New market entrants or innovative offerings from existing competitors could threaten Gamble City's market share and customer loyalty.



III- Marketing Plan

Online Advertising

We intend to promote our casinos through PPC campaigns and social media promotions depending on the regulation and country's legislation.

Customer Acquisition

We will employ targeted marketing campaigns and loyalty programs to attract and retain players, fostering a growing player community.

Customer Support

A dedicated and experienced Customer Support team will be available 24/7 in multiple languages to assist the players with the inquiries, complaints, and issues. We want to ensure a swift and effective problem resolution.

Understanding regulations: MOA Communications B.V. has a comprehensive understanding of the iGaming regulations in Curacao, as outlined in the Curacao Gaming Control Board's guidelines. We are dedicated to strict compliance and transparency in our operations.

- **Licensing Process:** We have initiated the application process for the Curacao iGaming license. This license is essential for legal and legitimate operation within the jurisdiction.
- **Compliance measures:** Our compliance framework includes regular audits to ensure fairness and transparency, solid player verification procedures to prevent underage gaming and a dedicated experienced compliance team responsible for ongoing adherence to regulations.

Terms & Conditions

Legal will be described on the site as Terms & Conditions accessible from any page of the website. Additionally, the player will be asked to read and agree to those Terms when registering an account on the website(s). The Terms & Conditions will outline the agreement between the customer and MOA Communications B.V. Failing to accept the mentioned terms will result in the cancellation of the registration of the user's account with immediate effect.

Risk Evaluation

Within the framework of our unwavering commitment to the highest standards of integrity, security, and transparency, (- -) has instituted a comprehensive Anti-Money Laundering (AML) policy. This policy is meticulously designed to fortify our operational framework against the infiltration of illicit financial activities and to ensure unwavering compliance with global regulatory mandates.



Principal Aims of Our AML Policy:

- **Prevention of Money Laundering:** (- -) maintains an unequivocal commitment to thwarting any attempts at utilizing our platform for money laundering. Rigorous procedures are in place to detect and deter transactions displaying indicators of potential money laundering activities.
- **Adherence to Regulatory Norms:** We pledge strict adherence to all pertinent laws and regulations governing AML and Counter-Terrorist Financing (CTF). Our policies undergo regular scrutiny and refinement to stay in consonance with the dynamic regulatory milieu, thereby guaranteeing full compliance.
- **Customer Due Diligence (CDD):** (- -) conducts exhaustive Customer Due Diligence, delving into understanding our users, their financial transactions, and the intrinsic nature of these dealings. This encompasses the verification of customer identities, ongoing account activity monitoring, and comprehensive risk assessments.
- **Continuous Surveillance and Reporting:** Our systems are fortified with robust monitoring mechanisms to perpetually assess transactional patterns and discern any aberrant or suspicious behaviour. In instances of detecting such activities, we undertake expeditious reporting to the pertinent authorities.
- **Employee Training and Awareness:** (- -) invests significantly in exhaustive training initiatives, ensuring that our personnel are well-versed in the intricacies of money laundering risks. Employees play a pivotal role in recognizing and promptly reporting any activities that raise suspicion.

This introductory elucidation serves as a testament to our steadfast commitment to upholding the most elevated standards of security and compliance. It lays the groundwork for the ensuing exhaustive AML policy, delineating intricate procedures, protocols, and mechanisms instituted to fortify our platform. We invite all concerned parties to acquaint themselves with our AML policy, thereby gaining profound insights into our dedication to a secure, trustworthy, and legally sound operational environment.

NB: The full AML Policy can be found as addendum.

IV- Overview of the products

Services offered

MOA Communications B.V. website(s) will provide a comprehensive offer of online gaming services, including:

- **Casino Games:** A broad selection of classic and modern casino games
- **Live Casino Games:** Real-time, interactive casino games with live dealers
- **Sportsbook**

Revenue Model

- **Player Bets:** Revenues generated through player's bets on various games
- **House Edge:** Profits from the inherent advantage of casino games



V- Financial Projections

3-Year Financial Projection Template in €

Year(1st)	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12	Total Year
FTDs	120	20	20	21	21	22	22	23	23	23	24	24	363
Active Players (including FTDs)	120	122	125	127	130	132	135	138	141	143	146	149	1,609
Total Deposits (€)	100,000	102,000	104,040	106,121	108,243	110,408	112,616	114,869	117,166	119,509	121,899	124,337	1,341,209
Total Withdrawals (€)	50,000	51,000	52,020	53,060	54,122	55,204	56,308	57,434	58,583	59,755	60,950	62,169	670,604
Total Bets (€)	250,000	262,500	275,625	289,406	303,877	319,070	335,024	351,775	369,364	387,832	407,224	427,585	3,979,282
Total Wins (€)	212,500	223,125	234,281	245,995	258,295	271,210	284,770	299,009	313,959	329,657	346,140	363,447	3,382,389
GGR (€)	37,500	39,375	41,344	43,411	45,581	47,861	50,254	52,766	55,405	58,175	61,084	64,138	596,892
Margin (%)	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%
Bonuses (€)	13,125	13,781	14,470	15,194	15,954	16,751	17,589	18,468	19,392	20,361	21,379	22,448	208,912
Bonuses (%)	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%
Game Provider Fee (€)	5,625	5,906	6,202	6,512	6,837	7,179	7,538	7,915	8,311	8,726	9,163	9,621	89,534
Game Provider Fee (%)	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%
Payment Processor Fee (€)	4,500	4,590	4,682	4,775	4,871	4,968	5,068	5,169	5,272	5,378	5,485	5,595	60,354
Platform Fee (€)	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	120,000
Affiliate Payments / User Acquisition (€)	1,200	200	204	208	212	216	221	225	230	234	239	244	3,634
Other Expenses (€)	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	60,000
Net Monthly Result (€)	-1,950	-103	786	1,722	2,708	3,745	4,838	5,989	7,200	8,475	9,817	11,230	54,458
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Year (2nd)	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12	Total Year
FTDs	25	25	26	26	27	27	28	29	29	30	30	31	334
Active Players (including FTDs)	152	155	158	162	165	168	171	175	178	182	186	189	2,041
Total Deposits (€)	126,824	129,361	131,948	134,587	137,279	140,024	142,825	145,681	148,595	151,567	154,598	157,690	1,700,977
Total Withdrawals (€)	63,412	64,680	65,974	67,293	68,639	70,012	71,412	72,841	74,297	75,783	77,299	78,845	850,489
Total Bets (€)	448,964	471,412	494,983	519,732	545,719	573,005	601,655	631,738	663,324	696,491	731,315	767,881	7,146,218
Total Wins (€)	381,619	400,700	420,735	441,772	463,861	487,054	511,407	536,977	563,826	592,017	621,618	652,699	6,074,285
GGR (€)	67,345	70,712	74,247	77,960	81,858	85,951	90,248	94,761	99,499	104,474	109,697	115,182	1,071,933
Margin (%)	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%
Bonuses (€)	23,571	24,749	25,987	27,286	28,650	30,083	31,587	33,166	34,825	36,566	38,394	40,314	375,176
Bonuses (%)	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%
Game Provider Fee (€)	10,102	10,607	11,137	11,694	12,279	12,893	13,537	14,214	14,925	15,671	16,455	17,277	160,790
Game Provider Fee (%)	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%
Payment Processor Fee (€)	5,707	5,821	5,938	6,056	6,178	6,301	6,427	6,556	6,687	6,820	6,957	7,096	76,544
Platform Fee (€)	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	120,000
Affiliate Payments / User Acquisition (€)	249	254	259	264	269	275	280	286	291	297	303	309	3,335
Other Expenses (€)	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	60,000
Net Monthly Result (€)	12,717	14,281	15,927	17,660	19,482	21,400	23,417	25,539	27,771	30,119	32,589	35,186	276,087
Year (3rd)	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9	Month 10	Month 11	Month 12	Total Year
FTDs	32	32	33	33	34	35	36	36	37	38	38	39	423
Active Players (including FTDs)	193	197	201	205	209	213	217	222	226	231	235	240	2,589
Total Deposits (€)	160,844	164,061	167,342	170,689	174,102	177,584	181,136	184,759	188,454	192,223	196,068	199,989	2,157,250
Total Withdrawals (€)	80,422	82,030	83,671	85,344	87,051	88,792	90,568	92,379	94,227	96,112	98,034	99,994	1,078,625
Total Bets (€)	806,275	846,589	888,918	933,364	980,032	1,029,034	1,080,486	1,134,510	1,191,235	1,250,797	1,313,337	1,379,004	12,833,581
Total Wins (€)	685,334	719,600	755,580	793,359	833,027	874,679	918,413	964,333	1,012,550	1,063,178	1,116,336	1,172,153	10,908,544
GGR (€)	120,941	126,988	133,338	140,005	147,005	154,355	162,073	170,176	178,685	187,620	197,001	206,851	1,925,037
Margin (%)	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%	15%
Bonuses (€)	42,329	44,446	46,668	49,002	51,452	54,024	56,725	59,562	62,540	65,667	68,950	72,398	673,763
Bonuses (%)	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%	5%
Game Provider Fee (€)	18,141	19,048	20,001	21,001	22,051	23,153	24,311	25,526	26,803	28,143	29,550	31,028	288,756
Game Provider Fee (%)	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%
Payment Processor Fee (€)	7,238	7,383	7,530	7,681	7,835	7,991	8,151	8,314	8,480	8,650	8,823	9,000	97,076
Platform Fee (€)	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	10,000	120,000
Affiliate Payments / User Acquisition (€)	315	322	328	335	341	348	355	362	370	377	384	392	4,230
Other Expenses (€)	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	60,000
Net Monthly Result (€)	37,917	40,790	43,810	46,987	50,326	53,838	57,530	61,412	65,493	69,783	74,293	79,034	681,212

Above is our projected financial forecast for the next 3 years.