

		Location	Checked	Instructions	Comments
cs	Corporate Structure				
1.	Start up / New company	BP/Internet/ Application Part 7	Y	<i>Check whether the company is live under Curacao.</i>	12.9.2018
	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>	GSP, 11 domains removed on 27.6.2025

		Location	Checked	Instructions	Comments
	GoAML				BCIF: Yes Uncertified FIUC 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>	UBO: Gideon J. A. van Kessel, who also appears as a UBO of UmiiUmii BV, a granted license. Glenn Rellum as MD (Representing sole corporate director downtown e-commerce BV) CO Mark Taylor, also indicated as MLRO in BCIF. He is a CO on a total of 5 applications CEO: Flynn Steward Lau COO: Ronalyn Flores CFO: Vai Hui

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								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	Must be dated within the last 3 months of submission. Check Director with submission CS.3	Yes															
CS.1.3	Shows Control Percentage					Y		Yes															
CS.1.4	Equity Adds Up					Y	Remark if there are minority shareholders.	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	Make sure share ledger lists all involved parties . Request trust deed.	Yes															
	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.																
						Y																	
CS 2.2	External Sources Verification	<table><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																							
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LinkedIn																							
Address (Google Maps)																							
CS.2.3	List all persons in Share Ledger over 10% -				BCI 10.2	Y																	

					Location	Checked	Instructions	Comments
	Company Belonging to:	Full Name	Passport Number	Country of Issue			<i>There has to be at least one UBO. All UBOs of companies with controlling interest must be listed. This section is linked to BC.</i>	
100	Class Innovation B.V	Gideon Jan Albert Van Kessel	NURJF9H46	Netherlands		Y		Declared an annual income of USD 95,000 and a net worth of USD 45,000 acquired through savings from employment income and other income – consulting fees. Declared involvement in Umiumii BV SOW submitted, 5 certified bank statements from Well Fargo, which show the majority of SOW deriving from ‘GvK Consulting Group LLC’, in amounts less than \$1000. The largest bank balance shows a balance of circa \$9200 in deposits in November 2025. The SR of Umiumii states:

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								1.4.7 The UBO and CEO is Gideon van Kessel (“GVK”) who is self-employed by GVK Consulting Group LLC (“GVKCG”) as CEO. It is a gaming consultancy company. He has declared an annual income of USD 150,000 and an estimated net worth of USD 525,000. He states this is comprised of; stocks and shares of \$150,000, property/real estate of \$350,000 and cash in the bank of \$25,000. (23) Gideon Van Kessel LinkedIn – his LinkedIn profile shows him to be the CEO and founder of GVKCG and to be in Florida, as per his application. He was previously an independent contractor at Playgon Games in Florida. Team C also provides a link to his Facebook page (11) Facebook. Team C has provided a link to an

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								article in which it is stated GVK, a Florida-based consultant, filed an \$8 million lawsuit against The Stars Group Inc. (formerly Amaya Inc.) and its then-CEO, David Baazov. The suit, lodged in Broward County, Florida, alleges that Van Kessel was engaged by the company for nearly four years to identify and acquire gaming-related businesses to enhance revenue and share valuation. He claims that after Amaya's December 2014 raids by the Royal Canadian Mounted Police (RCMP) and Quebec's securities regulator, Baazov and the company failed to compensate him and other key consultants for their work. \$8M lawsuit launched against David Baazov and the Stars Group - BNN Bloomberg. An Offshores leak search shows many involvements for a Jan Albert Van Kessel. VAN KESSEL, JAN

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								ALBERT ICIJ Offshore Leaks Database. As above, these are two of his given names on his passport and BC. Finally, Team C provides a link showing GVK to be involved in a domestic violence case in Florida. Susan Lepri Petitioner vs Gideon Van Kessel Respondent Court Records - UniCourt. It dates back to 2019. It seems as if the petitioner’s application for an injunction was declined.																
	External Sources Verification	<table><tr><td>NorthData</td><td>X</td></tr><tr><td>ICIJ</td><td>X</td></tr><tr><td>PRADO</td><td></td></tr><tr><td>Lexis Nexis</td><td></td></tr><tr><td>AMLRISK</td><td>x</td></tr><tr><td>LinkedIn</td><td>-</td></tr><tr><td>Onfido</td><td></td></tr><tr><td>Address (Google Maps)</td><td></td></tr></table>	NorthData	X	ICIJ	X	PRADO		Lexis Nexis		AMLRISK	x	LinkedIn	-	Onfido		Address (Google Maps)						<i>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.</i>	LN report on the applicant resulted in a hit with 2 enforcements Jan Albert van Kessel, Belgium
NorthData	X																							
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2.4	SOW declaration including supporting documents	Check question 1	Y	<i>Insufficient documentation – send a ticket</i>	
	SOF for new companies and reactivating companies		Y	<i>In the event of insufficient funding a ticket is sent for clarification.</i>	BCIF Q11: Loans by shareholder in the amount of Eur 50,000. No bank account/crypto wallet indicated in Qs 8 and 9. A CL was raised on the latter: Questions 8 and 9 have been left blank. Question 11.1 indicates that the company will be funded through shareholder loans. Please clarify as to where the company will be receiving the funds from the loan. <u>UPDATE</u> It was indicated that a reply was sent; however, no reply was received on our end. Please provide

		Location	Checked	Instructions	Comments
					clarification regarding the above. <u>UPDATE</u> No reply has been received regarding this. Please reply in the checklist item and provide clarification as to where the company will be receiving the funds from the loan. The BP has a 3 year financial forecast, which foresees the requirement of seed funding in year one and scalability and profits in year 2. Year one foresees A total revenue of Eur 100,000 with Eur 280,000 operating expenses, resulting in a net loss of Eur 180,000; whereas year 2 foresees a total revenue of Eur 700,000 with an OPEX of Eur

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					670,000, with a marginal net profit of Eur 30,000 which increases to Eur 930,000 in year 3, where revenue is expected to grow to Eur 2.5m FS 2021, showing a revenue of Eur 15,952,449 and a net profit of Eur 500,292 FS 2022: Showing a net profit of Eur 461,878 FS 2023: Showing a revenue of over Eur 20m and a net profit of Eur 736,712 and FS 2024 showing a net profit of Eur 400,211 A number of SOF documents, consisting of bank statements appertaining to the UBO were rejected. A Certified loan agreement, between the UBO as lender and the applicant company

		Location	Checked	Instructions	Comments
					was submitted. It was solely signed by the UBO (and not the MD), dated 1.1.2026, for the amount of Eur 50,000. The purpose of the loan is 'General running and operation of the business, including working capital requirements and other ordinary course business expenses.' And has a 5 year maturity date. A CL item had been opened ‘Please submit a certified copy of the loan agreement which outlines the key terms, including the funding, and any interest on the loan and the repayment terms (if applicable). The loan agreement must be signed

		Location	Checked	Instructions	Comments
					by all parties and certified as a true copy. Kindly upload it in the Source of Funding Section.' <u>UPDATE</u> The loan agreement is not signed by the Principal Debtor. Please resubmit a certified copy of the loan agreement duly signed by both parties. To white the customer replied 'uploaded' on the 30.4.2026 Another CL item was opened: Please provide the signed financial statements for 2025 (in whatever form). <u>UPDATE</u>

					Location	Checked	Instructions	Comments
								In the reply it was indicated that the financial statements were uploaded; however, they were not found in the portal. Please upload the signed financial statements for 2025 (in whatever form).
		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	Check voting rights and appointment.	Yes. One or more managing 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	Replicate 3.4. and 3.4.1 for every company	
						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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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.															
	Downtown E-Commerce BV				Co Reg 142919			Y		Sole director Verified www2.curacao-chamber.com/excerpt.asp														

			Location	Checked	Instructions	Comments
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		Lexis Nexis				
		AMLRISK				
		LinkedIn				
		Address (Google Maps)				

CLs to be raised:

1. To request that the certified loan agreement be submitted, duly signed by both parties (transfer this item)
2. To reiterate the request, for FS 2025, in whatever form, to be submitted (transfer this item)
3. UBO: SOW is insufficient and needs to be substantiated. Net worth does not appear to be properly declared on PHDF, as it doesn't make sense in relation to the profits of the company; furthermore, his Eur 50k loan would absorb all that which is declared.
4. To transfer the query relating to Qs 8 and 9 of the BCIF