
Re: Swivel B.V. - Change of UBO - CONFIDENTIAL

From Gouloud Hammoud <Gouloud@gfcgroup.co>

Date Fri 2/27/2026 5:31 PM

To Dennis Engelhardt <engelhardt_d@cga.cw>; Jamilla Winklaar <jamilla@gfcgroup.co>; egl-applications <egl-applications@cga.cw>; Pietersz, Cedric <Pietersz_C@cga.cw>

Cc Emely Curiel <emely@gfcgroup.co>

 3 attachments (876 KB)

151.300 Bank confirmation letter.pdf; Jason M - Bank Statement.pdf; Email Amina.JPG;

Dear Dennis,

Please find attached the letter from Amina Bank together with the screenshot of their email.

Kindly note that it took us a moment to revert because - and as per the banks' compliance-, the statements are generated digitally. Please feel free to contact the bank directly, if necessary.

The same attachments are submitted in the portal. We look forward to the change of control approval letter. Thank you for your kind cooperation.

Best regards



Gouloud Hammoud

GFC Group

"Building TRUST is our commitment"

Kaya Richard J. Beaujon z/n

Landhuis Joonchie II

Curacao, Dutch Caribbean

P.O.Box 6248 | +599 (9) 733 1839

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From: Dennis Engelhardt <engelhardt_d@cga.cw>

Sent: Thursday, February 26, 2026 4:18 PM

To: Jamilla Winklaar <jamilla@gfcgroup.co>; egl-applications <egl-applications@cga.cw>; Pietersz, Cedric <Pietersz_C@cga.cw>

Cc: Gouloud Hammoud <Gouloud@gfcgroup.co>; Emely Curiel <emely@gfcgroup.co>

Subject: Re: Swivel B.V. - Change of UBO

Dear Jamila,

As per our telephone conversation, please note that the uploaded SOW must be certified in order to finalize the approval and provide the UBO approval letter.

Kind regards,

Dennis J. Engelhardt

Curaçao Gaming Authority

Scharlooweg 172-174 | Willemstad | CURAÇAO

Tel: +599 (9) 737-2299

Email: engelhardt_d@cga.cw

Web: www.cga.cw



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From: Jamilla Winklaar <jamilla@gfcgroup.co>

Sent: Tuesday, February 24, 2026 8:55 AM

To: egl-applications <egl-applications@cga.cw>; Pietersz, Cedric <Pietersz_C@cga.cw>; Dennis Engelhardt <engelhardt_d@cga.cw>

Cc: Gouloud Hammoud <Gouloud@gfcgroup.co>; Emely Curiel <emely@gfcgroup.co>

Subject: Re: Swivel B.V. - Change of UBO

Dear Sirs,

We would appreciate to receive an update on the status of the change of UBO. The other UBOs were removed from the portal in accordance with the instructions received; please refer to the below screenshot. The requested bank statement has also been submitted to the portal on 16 January 2026.

A new Ticket ID ID#SP-18268 (attached) has been created today, as the principals are currently awaiting the CGA advise in order to proceed with the required updates to the due-diligence documentation in connection with the engagement of service parties.

Qualifying Persons

Show entries

Position	Submitted On	Removed On	Verified
Jason Morton QPA/2024/01052			
Ultimate Beneficiary Owner	02-04-2024	Still Active	
Owen Morton QPA/2024/01053			
Ultimate Beneficiary Owner	02-04-2024	12-01-2026	
Shane Morton QPA/2024/01054			
Ultimate Beneficiary Owner	02-04-2024	12-01-2026	

We look forward to your reply so that we may duly inform the operator.

Best regards,

Jamilla

G-Force Corporate Services B.V.

"Building TRUST is our commitment"

From: Jamilla Winklaar <jamilla@gfcgroup.co>

Sent: Friday, January 9, 2026 4:31 PM

To: Dennis Engelhardt <engelhardt_d@cga.cw>; egl-applications <egl-applications@cga.cw>; Pietersz, Cedric <Pietersz_C@cga.cw>

Cc: Gouloud Hammoud <Gouloud@gfcgroup.co>; Emely Curiel <emely@gfcgroup.co>
Subject: Re: Swivel B.V. - Change of UBO

Dear Dennis,

Thank you for your email. We wish you and your team a Happy New Year as well.

You stated below that the two UBOs should be removed. We can remove/insert the end date for the UBOs upon receipt of the CGA formal official letter authorizing the change. This in observance of the CGA policy guidelines.

We are in contact with Mr. Jason Morton for the additional requested information.

Best regards,
Jamilla

G-Force Corporate Services B.V.
"Building *TRUST* is our commitment"

From: Dennis Engelhardt <engelhardt_d@cga.cw>
Sent: Friday, January 9, 2026 8:07 AM
To: Jamilla Winklaar <jamilla@gfcgroup.co>; egl-applications <egl-applications@cga.cw>; Pietersz, Cedric <Pietersz_C@cga.cw>
Cc: Gouloud Hammoud <Gouloud@gfcgroup.co>; Emely Curiel <emely@gfcgroup.co>
Subject: RE: Swivel B.V. - Change of UBO

Good day Jamilla and Happy New Year to you and your Team,

In connection with the below request, please be informed that there is now only one UBO and an additional SOW is required for approval. A checklist has been uploaded. Also, note that you need to update the application by removing the other UBOs in the portal.

If you require more information, please let us know.

Kind regards,

Dennis J. Engelhardt
Account Manager

Curaçao Gaming Authority
Scharlooweg 172-174 | Willemstad | CURAÇAO
Tel: +599 (9) 737-2299
Email: engelhardt_d@cga.cw
Web: www.cga.cw



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From: Jamilla Winklaar <jamilla@gfcgroup.co>
Sent: Wednesday, December 31, 2025 11:31 AM
To: egl-applications <egl-applications@cga.cw>; Dennis Engelhardt <engelhardt_d@cga.cw>; Pietersz, Cedric <Pietersz_C@cga.cw>
Cc: Gouloud Hammoud <Gouloud@gfcgroup.co>; Emely Curiel <emely@gfcgroup.co>
Subject: Re: Swivel B.V. - Change of UBO

Dear Sirs,

Please find attached several tickets created in the CGA portal, starting on July 14th , 2025, informing the proposed change in ownership. All the relevant documents of the new UBO, including the share transfer agreement, have been submitted in the portal. Despite multiple reminders via tickets attached to this email. The feedback received in the , we have not received any feedback. The principals are currently pending your advice so that the necessary due diligence can be updated in connection with start of engaging service parties and opening a bank account. Please note that for onboarding purposes a valid shares registry must be presented.

We kindly ask to review this matter to inform the applicant.

Looking forward to your prompt reply to inform the operator.

Best regards,
Jamilla

G-Force Corporate Services B.V.
"Building TRUST is our commitment"

From: Jamilla Winklaar <jamilla@gfcgroup.co>
Sent: Wednesday, December 10, 2025 9:31 AM
To: egl-applications <egl-applications@cga.cw>; Dennis Engelhardt <engelhardt_d@cga.cw>
Cc: Gouloud Hammoud <Gouloud@gfcgroup.co>; Emely Curiel <emely@gfcgroup.co>
Subject: Re: Swivel B.V. - Change of UBO

Dear Sirs,

We are following up on our email below of November 25th. The client is chasing us and would appreciate an update on the change of UBO.

Best regards,
Jamilla

G-Force Corporate Services B.V.
"Building TRUST is our commitment"

From: Jamilla Winklaar <jamilla@gfcgroup.co>
Sent: Tuesday, November 25, 2025 10:53 AM
To: egl-applications <egl-applications@cga.cw>; Dennis Engelhardt <engelhardt_d@cga.cw>
Cc: Gouloud Hammoud <Gouloud@gfcgroup.co>; Emely Curiel <emely@gfcgroup.co>
Subject: Swivel B.V. - Change of UBO

Dear Sirs,

Further to our ticket ID #SP-100064 dated July 14th 2025, please be informed of the following:

- The declaration letter regarding the change of UBO has been duly submitted on July 14, 2025.
- All principal's documents were provided at the commencement of the application on 2 April 2024 under reference number QPA/2024/01052.
- The draft share ledger, updated draft company structure, and draft share transfer agreements were submitted on 8 August 2025.
- On 12 August 2025, the application was assigned for further processing.

A new Ticket ID ID#SP-124574 (attached) has been created, as the principals are currently awaiting the CGA advise in order to proceed with the required updates to the due-diligence documentation in connection with the engagement of service parties.

We would appreciate your prompt feedback so that we may duly inform the operator.

Best regards,



Jamilla Winklaar
GFC Group
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Kaya Richard J. Beaujon z/n
Landhuis Joonchie II
Curacao, Dutch Caribbean
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