

# 198198.io Business Plan

**198198.io** is a newly established, global iGaming brand preparing to launch a premier sports betting and casino operation. Built on a foundation of robust, licensed technology from our strategic partner **NEON EIGHT TECHNOLOGIES LIMITED ("NETL")**, 198198.io is committed to delivering a safe, compliant, and market-leading experience.

While 198198.io is a new market entrant without prior licensing history, our operational roadmap is designed to replicate the stability and scale of established European operators. We plan to expand our Total Addressable Market (TAM) by entering the regulated space via the Curacao license, leveraging a dual-currency approach that bridges traditional fiat banking with the efficiency of cryptocurrency.

**Strategic Pillars** To distinguish ourselves in a competitive landscape, we emphasize four core pillars:

1. **Frictionless Accessibility:** A "mobile-first" philosophy ensuring ease of registration and navigation.
2. **Product Depth:** A competitive sportsbook with deep liquidity and a casino library exceeding 3,000 titles.
3. **Value Proposition:** Transparent bonuses, competitive odds margins, and a player-centric loyalty structure.
4. **Intelligent UX:** Real-time personalization and proprietary tools like "Bet Mentor" to guide user engagement.

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## 2. Company Overview & Ownership

### 2.1 Legal Structure

- **Licence Applicant / Operating Company**
  - **Vertex Target Inc**
  - Incorporated in Curaçao and applying for a remote gaming licence from the CGA to operate online sports betting and casino games under the brand 198198.io.

- **Group & Shareholding**

- The Curaçao operating company will be wholly owned by [\[Vertex Target Inc\]](#), a holding company established in a reputable jurisdiction with robust corporate and financial reporting standards (exact jurisdiction and registration details to be appended).

- **Technology Partner**

- 198198.io will not operate an in-house proprietary platform. Instead, it will enter into a long-term licensing and services agreement with **NETL**, which will provide the core betting and gaming platform, PAM, integrations to data, odds, and game suppliers, and certain managed services.

## 2.2 Business Rationale

198198.io has been conceived as a digital-native, crypto-inclusive iGaming brand that combines the robustness of traditional regulated operators with the flexibility and innovation expected from a modern web-first platform. The CGA licence is the foundational regulatory approval required to:

- Offer remote sportsbook and casino products to customers in carefully selected international markets;
- Provide a safe, compliant environment for crypto-friendly players who seek a trusted and transparent operator;
- Build a scalable platform for additional locally licensed operations in the future, where relevant and permitted.

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## 3. Market & Product Overview

198198.io will position itself as a **global entertainment destination** rather than a purely transactional wagering site. The central product pillars are:

- **Sportsbook** – comprehensive pre-match and live betting across key global sports, niche regional sports, and virtual sports.

- **Casino & Slots** – a multi-provider library of slots, tables, live dealer games, and proprietary titles.
- **Unified Wallet & Payments** – high-availability fiat and crypto payment rails in a single wallet environment.

The brand will initially focus on international markets where operations are permissible under Curaçao law and where local legislation allows offshore, CGA-licensed operators to serve customers. Geographic expansion will be phased and data-driven.

### 3.1 Target Customers

- **Recreational players**, seeking simple interfaces, low-stakes entertainment, and clear product education.
- **Experienced bettors**, seeking deeper markets, live betting, and sophisticated tools such as Bet Mentor and Bet Builder.
- **Crypto-native users**, who prefer to deposit and withdraw using cryptocurrencies or stablecoins while still expecting regulated oversight and consumer protection.

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## 4. Sportsbook – Product & Features

### 4.1 Sports Coverage

The 198198.io Sportsbook will offer a broad global and regional menu including, but not limited to:

- **Soccer (Football)** – international tournaments, top European and global leagues, secondary divisions, and selected regional competitions where permitted.
- **Cricket** – international series, domestic leagues, franchise tournaments, and regional competitions.
- **Basketball** – major global leagues and international tournaments.

- **American Football** – top professional and collegiate competitions where data and rights allow.
- **Horse Racing & Greyhounds** – selected race meetings from licensed jurisdictions with robust integrity frameworks.
- **Kabaddi and other regional sports** – tailored to markets where these sports are culturally significant and legally permissible.
- **Virtual Sports** – always available, high-frequency simulated events (football, horse racing, greyhounds, etc.), using certified RNG engines.

For each sport, 198198.io will:

- Cover all major international tournaments and leagues;
- Add key domestic and regional tournaments where lawful and commercially viable;
- Curate localised event menus for specific markets, ensuring relevance without compromising compliance.

## 4.2 Markets & Betting Options

Depending on the sport and event profile, the Sportsbook will offer **up to 400 individual markets per event**, including:

- **Main markets** – match winner (1X2), moneyline, spreads/handicaps, totals (over/under), double chance, draw-no-bet.
- **Player & team props** – goals, points, assists, cards, rebounds, yards, wickets, runs, etc.
- **Period-based markets** – half-time, quarter, set or over-by-over betting.
- **Combination & system bets** – accumulators, system multiples, same-game combos.
- **Special & novelty markets** – where permitted and supported by reliable data feeds.

Both **pre-match** and **live/in-play** betting will be available, with dynamic odds updates powered by NETL's trading platform and third-party data feeds. Automated and manual controls will be used to manage latency, suspensions, and market closures to mitigate integrity and exposure risks.

### 4.3 Unique Feature: “Bet Mentor”

“**Bet Mentor**” will be a proprietary, non-binding betting assistant integrated into the Sportsbook:

- Analyses historical and real-time odds data, user behaviour, and risk preferences to surface suggested markets and bet combinations.
- Enables users to explore alternative selections, stake levels, and potential returns within their chosen risk appetite.
- Supports safer play by highlighting lower-risk options (e.g., doubles instead of large accumulators) where appropriate.
- Clearly communicates that suggested bets are **recommendations only**, not financial advice, and that the final decision always rests with the customer.

All algorithms and display logic related to Bet Mentor will be subject to internal model validation, audit trails, and clear disclosures to ensure transparency and fairness.

### 4.4 Trading & Risk Management

Sportsbook trading and risk will be managed collaboratively between 198198.io’s internal risk team and NETL’s managed trading services:

- **Automated pricing** based on official and reputable data sources, with machine-learning models for market movement and exposure control.
- **Manual oversight** by experienced traders for major events, sharp customer segments, and exceptional circumstances.
- **Dynamic limits** per user, market, and event, factoring in risk scores, bet history, and KYC level.
- **Configurable margin and payout controls**, aligned with the business plan and regulatory requirements.
- **Real-time monitoring dashboards** to identify suspicious betting patterns, potential match-fixing, or bonus abuse, feeding into the AML/anti-fraud workflows.

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## 5. Casino & Slots – Product & Features

## 5.1 Game Portfolio

The 198198.io Casino will launch with **over 3,000 games**, curated across multiple categories:

- **Live Casino** – roulette, blackjack, baccarat, game shows, and regional variants provided by top-tier studios such as *Evolution*, *Ezugi*, *Scribe*, *Playtech* and other reputable partners.
- **RNG Table Games** – blackjack, roulette, baccarat, poker, and dice variants with multiple stake levels.
- **Video Slots** – classic, video and branded slots, megaways, cluster slots, and high-volatility titles from established and emerging studios.
- **Jackpot Games** – local and networked jackpots with clearly disclosed RTP, volatility, and jackpot contribution rules.
- **Instant-win & alternative verticals** – keno, crash games, mines games, and other fast-paced formats where permitted.

Game content will only be sourced from studios that hold appropriate certifications (e.g., independent RNG testing) and are compatible with CGA expectations of fairness and technical integrity.

## 5.2 Casino UX & Core Features

Drawing on best-practice casino platform design, 198198.io will provide:

- **Structured lobbies** – “Top Games”, “New”, “Live Casino”, “Jackpots”, “High Volatility”, “Crypto-Friendly”, etc.
- **Advanced search & filtering** – search by game name, provider, theme, volatility, features (e.g., free spins, megaways).
- **Favourites & recency** – “Recently Played” and “My Favourites” sections to facilitate return visits with minimal friction.
- **Contextual information** – RTP, volatility descriptors, feature explanations, and any applicable wagering requirements displayed clearly.
- **Personalised recommendations** – based on historic play, with guardrails to avoid encouraging excessive or harmful play (e.g., excluding self-limited categories).

## 5.3 Proprietary & In-House Games

In partnership with NETL, 198198.io will commission a suite of **proprietary games** exclusive to the brand:

- Modern, mobile-first layouts optimised for small screens and progressive web apps.
- Crypto-aligned features where permitted (e.g., on-chain themed games, transparent RNG disclosures, crypto-denominated jackpots).
- Themes and mechanics designed around global sporting and entertainment cultures, while avoiding IP infringements and respecting local sensitivities.
- Full auditability of RNG and payout configurations, with testing by an independent lab prior to launch.

These proprietary titles will support brand differentiation in competitive markets and provide additional flexibility to implement safer-gambling features (e.g., built-in session length nudges, configurable max-bet parameters).

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## 6. Technology & NETL Partnership

### 6.1 Platform Overview

NETL will provide an end-to-end iGaming technology stack including:

- **PAM (Player Account Management)** – registration, authentication, KYC workflow management, wallet, limits, self-exclusion and other responsible gaming settings.
- **Sportsbook Engine & API** – event management, market catalogues, odds feeds, bet acceptance, bet settlement, cash-out, and Bet Builder.
- **Casino Aggregation Layer** – unified integration to multiple content providers, supporting single wallet, common bonus system, and risk controls.
- **CRM & Campaign Orchestration** – segmentation, triggers, bonus awarding, multichannel messaging (email, SMS, push, on-site).
- **Payments Gateway** – connectors to fiat PSPs, card schemes, e-wallets, and crypto processing partners, with comprehensive reconciliation and risk controls.

- **Reporting & BI** – real-time dashboards and scheduled regulatory, financial, and operational reports.

The platform is **API-first**, allowing the 198198.io front-end to leverage a modular approach to UX design and enabling rapid iteration without compromising back-end stability.

## 6.2 Security, Reliability & Data Protection

- **Infrastructure & Hosting** – production environments will be hosted in secure, professionally managed data centres with redundancy across multiple availability zones.
- **Uptime & Performance** – the platform is engineered to meet high availability targets, with auto-scaling and load balancing for peak periods.
- **Information Security** – application and data layers protected by industry-standard encryption (in transit and at rest), strict access controls, logging, and regular security testing.
- **Data Protection & Privacy** – customer data processed in accordance with applicable data-protection laws and CGA requirements, with privacy-by-design principles embedded in system architecture.

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## 7. Operations & Staffing (Philippines, Malaysia, Sri Lanka)

### 7.1 Operational Model

While the licence and ultimate accountability sit with the Curaçao entity, day-to-day operations will be executed through three **operations centres**:

#### 1. Philippines Operations Centre

- Primary hub for **customer support, VIP servicing, and first-line fraud/risk monitoring**.
- 24/7 multilingual support via live chat, email, and—subject to regulatory requirements—voice and messaging apps.

- Training programmes covering product knowledge, RG indicators, AML red flags, and data-privacy obligations.

## 2. Malaysia Operations Centre

- Focus on **CRM execution, campaign management, performance marketing analytics**, and **content localisation**.
- Responsible for building and executing lifecycle journeys (onboarding, activation, retention, reactivation) under group-level RG guidelines.
- Works closely with Product to localise front-end content, language, and promotions for specific markets.

## 3. Sri Lanka Operations Centre

- Hub for **sportsbook operations, trading support**, and **back-office administration**.
- Assists NETL in odds monitoring, settlement review, and escalation of integrity concerns.
- Provides reconciliations, KYC processing support, and first-line compliance checks.

All centres will operate under **documented policies and procedures**, with clear reporting lines into the Curaçao entity's senior management and compliance function.

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# 8. Payments, Crypto & Fiat

## 8.1 Fiat Payment Methods

198198.io will support a range of region-appropriate fiat payment options, such as:

- International and local **card schemes** (debit and credit) subject to issuer permissions;
- **Bank transfers** and instant banking solutions where available;
- **E-wallets** and alternative payment methods popular in specific markets.

All fiat payments will be processed through authorised Payment Service Providers (PSPs) and/or Electronic Money Institutions (EMIs), with:

- Real-time fraud scoring for deposits and withdrawals;
- Robust chargeback management and monitoring of payment-related disputes;
- Daily reconciliation between PSP statements, internal ledgers, and customer balances.

## 8.2 Crypto Payments

For cryptocurrencies, 198198.io will:

- Accept leading coins and stablecoins (e.g., BTC, ETH, selected stablecoins), subject to risk assessments and CGA guidance;
- Use vetted crypto processing partners and/or self-managed wallets with institutional-grade security;
- Maintain **segregated hot and cold wallets**, minimising on-platform balances and securing the majority of funds in cold storage;
- Implement **on-chain monitoring and screening** to identify tainted funds, sanctioned addresses, or suspicious transaction patterns;
- Ensure that deposits and withdrawals are always associated with fully KYC'd accounts, with enhanced due diligence for higher thresholds.

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## 9. Risk Management, AML & Responsible Gaming

### 9.1 Risk Management Framework

198198.io will adopt a **three-lines-of-defence** model:

1. **First line** – Operations, Product, and Customer Support responsible for day-to-day adherence to policies.

2. **Second line** – Compliance, AML, and Risk functions responsible for oversight, monitoring, and policy design.
3. **Third line** – Independent audit (internal or external) performing periodic reviews and reporting findings to senior management and, where necessary, the CGA.

Key enterprise risks (regulatory, financial, operational, cyber, reputational) will be identified in a formal risk register, with clear ownership, mitigation actions, and review cycles.

## 9.2 AML/CFT Programme

The AML/CFT framework will align with Curaçao legislation, CGA directives, and FATF Recommendations. Core components include:

- **Customer Due Diligence (CDD)** – identity verification using document, biometric, and data sources; risk-based tiering of limits and permissions.
- **Enhanced Due Diligence (EDD)** – for high-risk customers, large transactions, complex corporate structures, and PEPs.
- **Ongoing Monitoring** – automated transaction monitoring rules and scenarios (velocity checks, unusual patterns, crypto on-chain analysis), with manual review queues.
- **PEP & Sanctions Screening** – initial and ongoing screening via reputable providers, with immediate escalation of matches.
- **Record-Keeping** – retention of KYC, transaction, and communication records for periods required by law and CGA guidance.
- **Suspicious Activity Reporting** – documented procedures for internal escalation, MLRO assessment, and reporting to relevant Financial Intelligence Units.

Regular staff training on AML/CFT obligations will be mandatory for all relevant employees and contractors.

## 9.3 Fraud Prevention

- Use of device fingerprinting, IP and geolocation checks, and behavioural analytics.
- Multi-account detection and collusion monitoring.
- Controls against bonus abuse, chargeback fraud, and account takeover.

- Integration between fraud tools and the AML monitoring layer to ensure a holistic view of risk.

## 9.4 Responsible Gaming

198198.io recognises that responsible gaming is a central requirement for a CGA-licensed operator. The responsible gaming framework will combine **technology controls**, **customer-facing tools**, and **operational processes**:

### Player Tools (within PAM):

- Deposit, loss, and session-time limits (daily/weekly/monthly).
- Cooling-off periods and temporary time-outs.
- Self-exclusion for defined periods or permanently, with appropriate blocking across all linked accounts.
- Reality checks and reminders during extended sessions.
- Accessible gaming history, including net position and time spent.

### Operational Measures:

- Responsible-gaming messaging embedded in UX, marketing communications, and promotional materials.
- Monitoring of behavioural markers of harm (e.g., chasing losses, sudden escalation of stakes, use of multiple cards) with intervention protocols.
- Training of frontline teams to recognise and respond to RG issues.
- Links to reputable problem-gambling support organisations and clear internal escalation pathways for distressed customers.

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## 10. Regulatory & Licensing Strategy (CGA)

### 10.1 Current Licensing Position

- 198198.io is a **new brand** that is not yet live.
- Neither 198198.io nor its operating company currently holds any active gaming licences in any jurisdiction.
- The present application seeks an initial **remote gaming licence from the Curaçao Gaming Authority** to cover online sports betting and casino games.

## 10.2 Regulatory Approach

The company commits to:

- Operating strictly within the scope of the granted licence(s) and CGA regulations;
- Avoiding customers from prohibited jurisdictions using geolocation, IP blocking, and payment controls;
- Implementing comprehensive AML/CFT and responsible-gaming frameworks as described in this document;
- Providing full transparency to the CGA regarding ownership, funding sources, operational arrangements, and key contracts.

## 10.3 Governance & Key Persons

- Appointment of **Key Persons** (e.g., Managing Director, Compliance Officer/MLRO, Finance Director, Head of Operations) subject to CGA approval and probity checks.
- Clear **Terms of Reference** for the Board and any internal committees (Risk, Compliance, Audit).
- Regular reporting to the Board on regulatory KPIs (complaints, disputes, RG interactions, AML alerts, regulatory incidents).

## 10.4 Reporting & Cooperation with CGA

- Timely submission of required reports (financial, operational, AML, RG) in the formats specified by the CGA.

- Immediate notification of material incidents (security breaches, serious complaints, suspected criminal activity).
  - Proactive engagement with the CGA on policy changes, interpretation questions, and best-practice development.
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## 11. Growth & Marketing Strategy (High-Level)

198198.io's growth strategy is designed to be **sustainable, compliant, and data-driven**, avoiding aggressive or irresponsible acquisition tactics.

### 11.1 Brand & Positioning

- Position 198198.io as a **trusted, innovative iGaming destination** combining the familiarity of traditional betting formats with modern UX and crypto-friendly payments.
- Emphasise safety, transparency, and user control in all brand narratives.

### 11.2 Acquisition Channels

- **Performance Marketing** – search, display, video, and social campaigns in permitted markets, with strict geo-targeting and age-gating.
- **Affiliate & Partner Networks** – collaboration with vetted affiliate partners operating under clear contractual and compliance obligations, including full adherence to marketing guidelines and RG standards.
- **SEO & Content Marketing** – educational content about sports, casino games, and safer gambling to drive organic reach and brand authority.

All advertising will:

- Avoid misleading offers or unrealistic claims;
- Clearly disclose bonus terms and wagering requirements;
- Exclude imagery or themes that appeal to minors;

- Respect local advertising codes and CGA guidance.

### 11.3 Retention & CRM

Retention strategy will leverage the CRM capabilities of the platform:

- Lifecycle-based journeys (registration, first-time deposit, active, lapsing, dormant).
- Personalised but non-coercive bonuses and rewards that consider RG flags and AML risk ratings.
- Multi-channel outreach (email, SMS, push, on-site messaging) with strict opt-in and privacy controls.
- Structured VIP programme for higher-value customers, with enhanced RG oversight and clear affordability consideration.

KPIs will focus on **quality and sustainability** (e.g., net gaming revenue per active user, long-term retention, complaint ratios) rather than purely on short-term volume.

### 11.4 Licensing Expansion & M&A Strategy

In addition to organic growth, 198198.io will adopt a measured approach to licensing expansion and corporate development:

- **Further Licensing Opportunities:**  
The company will actively monitor emerging markets as they introduce or clarify local iGaming regulation and, where commercially and operationally appropriate, will seek additional local licences to complement the core Curaçao licence. This will enable 198198.io to participate in newly regulated jurisdictions in a controlled and compliant manner.
- **Mergers & Acquisitions (M&A):**  
198198.io will also consider selective M&A activities involving established brands and operating businesses that demonstrate clear synergies with 198198.io's intended product, geographic, or capability footprint. Priority will be given to targets that:
  - Hold relevant local licences or regulatory approvals;
  - Offer existing customer bases, operational teams, or market positions aligned with 198198.io's roadmap; and

- Can materially accelerate time to market in priority jurisdictions compared to a purely organic launch.
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