

Preliminary Statement

Before responding individually, RCL believes it is important to address the context underlying a number of these questions.

A narrative has developed around RCL and its work in Curaçao that increasingly bears little resemblance to the facts. A number of the most prominent allegations have originated with individuals who were not directly involved in the development or implementation of the LOK, the internal operations or decision-making of the Ministry of Finance or the CGA, or the work undertaken by RCL. Some of those commentators may themselves have political, commercial or personal interests in the wider debate.

Regrettably, much of the reporting to date has repeated and amplified these allegations while subjecting their origins, evidential basis and the interests of those advancing them to considerably less scrutiny. The result is a risk that allegations, through repetition rather than verification, acquire the appearance of established fact.

RCL's Position

For the avoidance of any ambiguity:

- RCL is a service provider.
- The CGA is the statutory regulator.
- The Government is responsible for its own governmental and procurement decisions.

RCL is an external service provider. It was engaged to provide specialist expertise and additional capacity in support of one of the most substantial regulatory transformations undertaken by the jurisdiction.

Its work has included advisory, technical, professional, administrative and operational support associated with the development and implementation of the new regulatory infrastructure and the transition of an established international gambling sector into the new statutory regime.

The fact that this was substantial work should not be confused with the exercise of regulatory authority.

Repetition is not Corroboration.

A further issue has arisen through the repeated reporting of allegations concerning RCL.

Allegations and insinuations have entered the public domain, been repeated through commentary, interviews, political statements, social media and subsequent reporting, and have then been cited by later reports as though the existence of previous coverage independently validates the original proposition.

It does not. Repetition is not corroboration.

Five articles repeating the same allegation are not five independent sources. Where they ultimately derive from the same unsupported proposition, there remains one allegation, irrespective of how many times it has subsequently been reported.

There is a further consequence to this cycle of repetition: the burden of proof becomes inverted.

Ordinarily, a person advancing a serious allegation should be expected to provide some factual or evidential basis for it. Instead, RCL increasingly finds itself being asked to disprove propositions that have never first been established.

An unsupported allegation enters the public domain, is repeated often enough to acquire the appearance of credibility, and RCL is then expected to prove that it is untrue. In effect, the burden shifts from those making the allegation to RCL having to prove a negative.

That is neither a reasonable nor reliable basis for establishing the facts. RCL will answer legitimate questions concerning its conduct, but the starting point for any serious allegation should remain the same: what is the evidence that supports it?

RCL's Role and Scope of Services

RCL provides technology, technical expertise and professional support to the CGA. It does not exercise the statutory powers of the regulator. RCL cannot grant, refuse, suspend or terminate a licence; all regulatory decisions remain exclusively with the CGA.

A central component of RCL's engagement is a digital regulatory platform developed through many years of international gaming regulatory work. The platform enables the CGA to manage:

- B2C and B2B applications and their processing by CGA personnel.
- Information used for due diligence and risk assessment by the CGA.
- Monitoring of CGA licensed operators and registered domains.
- Regulatory reporting.
- Digital certificates, including the CGA's real-time dynamic seal.

For avoidance of doubt: the platform does **not** process payments to the CGA.

RCL also provides specialist technical and professional support in areas including licensing, compliance, monitoring and supervision. These specialists support the CGA; they do not substitute for it or exercise regulatory authority on its behalf.

This distinction is fundamental: technology and external expertise support the regulatory process, but statutory authority remains with the CGA.

RCL and its personnel also have extensive international experience providing regulatory technology, technical and advisory services in jurisdictions including the US, Canada, Georgia, Nigeria, Malta and the European Commission.

Responses

1. Did Random Consulting take part in a competitive tender process before being appointed to advise the Curaçao government on the implementation of the LOK?

Questions concerning the procurement process by which the Government of Curaçao engaged external advisers are properly addressed to the Government. Procurement is fundamentally a matter for the procuring authority, not the supplier.

RCL can, of course, answer questions concerning its own engagement, qualifications, experience and the services it provided. It cannot speak on behalf of the Government regarding the procurement process or the approvals and decisions through which that engagement was made.

2. Why were CGA payments processed using cryptocurrency?

RCL does not determine the CGA's payment policies or the methods by which the CGA processes payments, and it would be inappropriate for RCL to provide an explanation on the regulator's behalf.

If, however, this question is intended to refer to a specific payment involving RCL, please identify the transaction, including the date, amount and factual basis for the question. RCL will address any matter concerning its own transactions directly and on the record.

3. Why were CGA payments processed via Czechia?

Insofar as this concerns the CGA's financial arrangements, payment providers or banking infrastructure, it is properly addressed to the CGA.

If the question concerns a particular transaction involving RCL, please identify it and we will address the factual position.

RCL should not be expected to speculate about an undefined transaction or, by doing so, inadvertently accept a premise which has not been established.

4. Why is there no requirement to report suspicious betting that can indicate match manipulation in CGA licences?

RCL is not the regulator and does not determine the regulatory obligations imposed upon Curaçao licensees.

Nevertheless, the law provides that any suspicious gaming needs to be reported to the CGA. This includes suspicious betting and the licensee portal provides a mechanism to submit such reports.

5. Why is the CGA unable to host PDFs showing licences, revoked licences, etc. on its own website and a private company (SPIN) used to do this?

The premise of the question is abstract. The CGA is not “unable” to host documents on its own website cga.cw. Like any entity in any industry the CGA uses a combination of internal systems and specialist external technology providers to best meet its individual requirements. The choice of where particular information is hosted or published is an infrastructure and operational decision, not an indication of institutional capability or regulatory independence.

The CGA manages the domain cga.cw inhouse, therefore questions concerning the choice of technology providers or publication architecture for this site cannot be answered by RCL.

Where regulatory information and documents are made available through portal.cga.cw using technology supplied and supported by RCL, the information remains that of the CGA. RCL's role is technological only; the use of specialist external technology does not transfer ownership of CGA information, regulatory responsibility or statutory authority to RCL.

It is also important not to reduce the CGA's public verification infrastructure simply to the hosting of PDF documents. The CGA's Digital Seal system is controlled and hosted on CGA infrastructure and provides a dynamic, real-time mechanism through which individual licensed URLs and current licence status can be publicly verified.

6. How has effective due diligence been carried out on more than 600 licences?

The conduct of regulatory due diligence and the assessment of licence applications ultimately fall within the responsibility of the CGA.

RCL has provided professional, technical, administrative and operational support during the implementation of a substantial regulatory reform programme. That support should not be confused with the exercise of regulatory authority.

It is also important to understand the context. Curaçao was transitioning a substantial existing gambling sector into an entirely new statutory licensing and supervisory framework. This was not a case of hundreds of previously unknown businesses simply appearing and being licensed overnight.

Technology, structured application processes and specialist resources were deployed precisely because reform on this scale required the efficient collection, organisation and assessment of significant volumes of information.

The CGA has publicly documented the application process and its requirements, including through the application documentation available on its portal. Those materials provide considerably more meaningful context regarding the scope of information required and assessed than can be conveyed through the premise of the question alone.

Ultimately, however, decisions concerning the sufficiency of due diligence and the grant or refusal of licences are matters for the CGA.

7. What role does Random Consulting play in the approval or rejection of licences?

None whatsoever.

RCL does not grant, approve, refuse, suspend or revoke Curaçao gaming licences.

External specialists, including RCL, have provided technical, administrative, professional and operational support to the CGA during implementation of the LOK.

Assistance in processing, reviewing or administering licensing work should not be confused with the exercise of regulatory authority.

The legal authority to grant or refuse a licence rests with the CGA. RCL cannot issue a Curaçao gaming licence and cannot substitute its decision for that of the regulator.

8. Is Random Consulting effectively running the CGA?

No. Absolutely not.

Firstly, the CGA is responsible for all gaming in Curacao, including land-based casinos, lotteries and all other type of games, that require physical, onsite inspection constantly.

RCL is an external service provider focused on providing the digital system and assistance to the CGA personnel when required. It does not exercise the statutory powers of the CGA, does not grant or refuse licences and cannot substitute its decisions for those of the regulator.

The CGA engaged third-party expertise (RCL and other suppliers) during an exceptionally substantial regulatory transformation. The provision of extensive professional, technical, administrative or operational support does not transfer statutory authority to the provider.

The CGA retains its governance, statutory authority, regulatory responsibilities and decision-making powers.

9. What is Random doing to ensure that Curaçao-licensed operators do not breach anti-gambling laws of other jurisdictions?

RCL is not a gambling regulator and has no jurisdiction to police or enforce the gambling laws of other countries.

Equally, a Curaçao licence does not purport to give an operator permission to disregard the laws of another jurisdiction.

Operators are responsible for determining where they may lawfully offer their services and for obtaining appropriate legal advice concerning the jurisdictions in which they operate or target customers.

The CGA is responsible for regulating its licensees in accordance with Curaçao law and the Curaçao regulatory framework. Foreign authorities are responsible for the interpretation and enforcement of their own domestic laws.

Questions concerning the CGA's regulatory approach to overseas jurisdictions, the obligations it imposes upon its licensees, or regulatory action it may take where information concerning unlawful conduct is brought to its attention are properly addressed to the CGA.

RCL has no independent regulatory or enforcement power in this regard.