

Illinois Gambling Act (230 ILCS 10)

7/1/1

(230 ILCS 10/5.1) Section 5. 1 Disclosure of Records  
(a)

***Applicant: GeoComply Solutions Inc.***

Notwithstanding any applicable statutory provision to the contrary, the Board shall, on written request from any person, provide information furnished by an applicant or licensee concerning the applicant or licensee, his products, services or gambling enterprises and his business holdings, as follows:

1. The name, business address and business telephone number of any **applicant** or licensee.

*GeoComply Solutions Inc.  
545 Robson Street, Ste 2  
Vancouver, BC V6B 1A6  
(604)336-0877*

2. An identification of any applicant or licensee including, if an applicant or licensee is not an individual, the names and addresses of all stockholders and directors, if the entity is a corporation; the names and addresses of all members, if the entity is a limited liability company, the names and addresses of all the partners, both general and limited, if the entity is a partnership; and the names and addresses of all beneficiaries, if the entity is a trust. If an applicant or licensee has a pending registration statement filed with the Securities and Exchange Commission, only the names of those persons or entities holding interest of 5% or more must be provided.

*Directors: Anna Sainsbury, Executive Chair  
2954 Marine Drive, West Vancouver, BC V7V 1M2*

*David Briggs, Chief Product and Technology Officer  
2954 Marine Drive, West Vancouver, BC V7V 1M2*

*Vishal Amin, Outside Director  
Apt. 19B, 11 East 29<sup>th</sup> Street, New York, NY 10016 USA*

*Katie Lever, Independent Director  
1136 Pinehurst Drive, Las Vegas, NV 89109 USA*

*Shareholders:*

*Crati Holdings Ltd (37.76%) and Arcioni Holdings Inc.-subsidiary of Crati Holdings (4.99%) – UBO  
Anna Sainsbury aggregately owns 42.75%  
c/o 2900 550 Burrard St Vancouver, British Columbia, V6J 1M2 Canada*

*BXG Gaia Purchasers LLC, 19.66% - this is the investment vehicle through which our private equity shareholder, Blackstone, made its investment. As one of the world's largest private equity groups, it is not possible for us to trace beneficial ownership back to any one individual.  
345 Park Avenue, New York, NY 10154 USA*

*Ernest W. Moody Revocable Trust, 13.64% - Mr. Ernest Moody is the sole settlor, trustee, and beneficiary of this trust.  
175 E Reno Ave, Ste C6, Las Vegas NV 89119 USA*

3. An identification of any business, including, if applicable, the state of incorporation or registration, in which an applicant or licensee or an applicant's or licensee's spouse or children has an equity interest of more than 1%. If an applicant or licensee is a corporation, partnership or other business entity, the applicant or licensee shall identify any other corporation, partnership or business entity in which it has an equity interest of 1% or more, including, if applicable, the state of incorporation or registration. This information need not be provided by a corporation, partnership or other business entity that has a pending registration statement filed with the Securities and Exchange Commission.

*GeoComply Solutions was incorporated in British Columbia, Canada  
and the below are 100% owned by GeoComply Solutions Inc.*

*GeoComply Poland sp. z o.o was incorporated in Poland*

*GeoComply UK Limited was incorporated in the United Kingdom*

*GeoComply USA, Inc. was incorporated in Nevada*

*GeoGuard USA Inc. was incorporated in Nevada*

*GeoTech Hub Viet Nam Company Limited was incorporated in  
Vietnam*

*OneComply Inc was incorporated in British Columbia*

*\*Hero Group Corp. - GeoComply Solutions Inc. owns a 40% interest  
in this company*

4. Whether an applicant or licensee has been indicted, convicted, pleaded guilty or nolo contendere, or forfeited bail concerning any criminal offense under the laws of any jurisdiction, either felony or misdemeanor (except for traffic violations), including the date, the name and location of the court, arresting agency and prosecuting agency, the case number, the offense, the disposition and the location and length of incarceration.

*None*

5. Whether an applicant or licensee has had any license or certificate issued by a licensing authority in Illinois or any other jurisdiction denied, restricted, suspended, revoked or not renewed and a statement describing the facts and circumstances concerning the denial, restriction, suspension, revocation or non-renewal, including the licensing authority, the date each such action was taken, and the reason for each such action.

*None*

6. Whether an applicant or licensee has ever filed or had filed against it a proceeding in bankruptcy or has ever been involved in any formal process to adjust, defer, suspend or otherwise work out the payment of any debt including the date of filing, the name and location of the court, the case and number of the disposition.

*None*

7. Whether an applicant or licensee has filed, or been served with a complaint or other notice filed with any public body, regarding the delinquency in the payment of, or a dispute over the filings concerning the payment of, any tax required under federal, State or local law, including the amount, type of tax, the taxing agency and time periods involved.

*None*

8. A statement listing the names and titles of all public officials or officers of any unit of government, and relatives of said public officials or officers who, directly or indirectly, own any financial interest in, have any beneficial interest in, are the creditors of or hold any debt instrument issued by, or hold or have any interest in any contractual or service relationship with, an applicant or licensee.

*None*

9. Whether an applicant or licensee has made, directly or indirectly, any political contribution, or any loans, donations or other payments, to any candidate or office holder, within 5 years from the date of filing the application, including the amount and the method of payment.

*None*

10. The name and business telephone number of the counsel representing an applicant or licensee in matters before the Board.

*Ilkim Hincer – Chief Legal Officer*

*604-336-0877*

11. A description of any proposed or approved gambling operation, including the type of boat, home dock, or casino or gaming location, expected economic benefit to the community, anticipated or actual number of employees, any statement from an applicant or licensee regarding compliance with federal and State affirmative action guidelines, projected or actual admissions and projected or actual adjusted gross gaming receipts.

*None*

12. A description of the product or service to be supplied by an applicant for a supplier's license.

*GeoComply's advanced and adaptive geolocation solutions can be uniquely tailored to match complex legal and regulatory requirements, providing regulatory officials, as well as operators, with assurance that their online gaming enterprises are fully compliant with the applicable laws and regulations.*

*GeoComply's core compliance product is designed for bundling into a downloadable desktop or mobile client application. This solution is ideal for app-based products requiring the most stringent location compliance capabilities. The geolocation thus occurs seamlessly in the background during the customer's session, without any intrusion to the overall user flow/experience.*

*GeoComply's Database is our most simple to integrate solution, comprised of a locally hosted fraud database. Unlike mainstream IP databases, GeoComply provides multi-layered fraud protection against VPNs, proxies, peer-to-peer networks and other types of data manipulation. Our solution is continuously updated as new threats and data centers are identified and mitigation methods are developed.*

*GeoComply's Solus solution offers a no-download compliance option that works directly within the operator's website for all devices and user interfaces. For spoof-proof geolocation within the browser, this HTML5-based geolocation experience can be customized according to the security and compliance needs of the operator, with adaptable end-user prompts and secure collection of location data.*

*GeoComply TrueLocation API provides advanced location-based fraud detection, utilizing both a real-time risk engine and a historical risk engine to identify and flag potential fraudulent activity. By analyzing both real-time and historical data, the GeoComply TrueLocation API can help organizations easily identify and stop a wide variety of fraud including chargeback fraud, account sharing, CNP fraud and account takeovers.*

*Create customized virtual boundaries and restrict user access to a room, floor or zone of a gaming property within a few meters of accuracy. Combining the power of iBeacons with GeoComply's robust geolocation technology, PinPoint was designed specifically for the gaming industry's unique requirements and offers the same real-time anti-spoofing and fraud benefits as our mobile and desktop Download solutions.*

*GeoComply's IDComply is an integrated know-your-client (KYC) solution for the iGaming industry. IDComply is API-based and provides simple way for operators to query multiple vendors for both ID and age verification, which are mandatory checks that operators are required to perform on any new players signing up for their iGaming or sports betting platform.*