

The 2026 LOK Readiness Checklist

Everything you need to file under the new Curaçao Gaming Authority regime — without sending money to the wrong corporate-services shop.

Built for founders launching a new B2C casino, sportsbook, or hybrid product targeting EU/LATAM markets in 2026.

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Why this checklist exists

On 20 December 2024, Curaçao's National Ordinance on Games of Chance (*Landsverordening op de Kansspelen*, or **LOK**) replaced the decades-old NOOGH framework. The master/sub-license model is gone. The new Curaçao Gaming Authority (CGA) issues licenses directly, publishes them in a public register, and is — by their own numbers — rejecting roughly four in ten applications.

Most rejections come down to the same gaps: corporate structure that doesn't meet the new local-substance rules, an AML programme that fails CGA scrutiny, or technical evidence that doesn't map to GLI standards. None of those are hard problems — they're just unforgiving of shortcuts.

This checklist walks you through the six phases of a clean application. Use it as a planning document with your legal counsel and your tech provider. If it saves you one rejection cycle, it's paid for itself a hundred times over.

At-a-glance: official CGA fees (2026)

Item	Amount	Frequency
Application fee	€4,592	One-off
Annual B2C license fee	€47,450	Annual
– Treasury portion	€24,490	(included)
– Supervisory portion	€22,960	(included)
Add a primary web domain	€250	Per domain
Technical certificate request	€383	Per request
UBO registration	€150	Per UBO

Budget realistically for ~€55,000 in your first year once advisory, incorporation, and certification costs are added on top.

Phase 1 — Pre-application strategy

Decisions you need locked before you spend a euro on incorporation.

- **Confirm B2C is the right license type**
B2B (supplier) and B2C (operator) are now separate licenses. If you're white-labelling someone else's casino, you need different paperwork.
- **Define your in-scope verticals on day one**
Slots, table, live, sports, lottery, bingo can all sit on one B2C license — but you must declare them upfront. Adding a vertical later means an amendment fee and review.
- **Confirm market eligibility per vertical**
Curaçao license alone is not sufficient for many regulated EU markets. Map each target country to its acceptance status before you build to it.
- **Lock your funding runway to ≥ 18 months**
8–16 weeks to license + 6 months working-capital evidence + ramp-up means you need real capital, not a promise.

Phase 2 — Corporate structure & local presence

The new substance rules are where most 2026 applications fail.

- **Incorporate a Curaçao legal entity (statutory seat in Curaçao)**
Only Curaçao-incorporated entities can hold a LOK license. A foreign holdco above is fine; the licensee itself must be local.
- **Capitalise the entity with \geq ANG 100,000 (~€50k)**
Minimum share capital, evidenced by bank statement at the time of application.
- **Lease real office space in Curaçao with partitioned gaming area**
Mandatory by April 2026. Co-working desks won't pass — CGA expects dedicated, lockable space for gaming operations separated from any other business.
- **Appoint a resident managing director**
Must reside in Curaçao. The MD does not count toward the key-person headcount requirement.
- **Hire ≥ 1 full-time key person on the island**
A 'key person' is anyone with direct or indirect control over finances or compliance. Must be a real, full-time hire — not a nominee.

■ **Watch-out:** The local-substance rules are the single biggest LOK rejection driver. Plan and budget for an actual Curaçao operation, not a registered-agent shell.

Phase 3 — Documentation pack

What you'll upload through the CGA portal. Build this folder structure now.

- **UBO register entries for every beneficial owner ≥10%**
€150 processing fee per UBO. Include passport, address proof, source-of-wealth narrative, and a clean criminal-record certificate (apostilled if non-EU).

- **Personal Declaration (PHD) forms for all qualified interest holders**
Submitted via the official online portal. Updates to qualified interests later cost €128 per change — get them right the first time.

- **Three-year business plan with vertical-by-vertical financials**
CAC, GGR forecast, cost of bonusing, RTP assumptions, market entry sequence. CGA reviewers read these — 'standard template' plans get flagged.

- **Source-of-funds documentation for the share capital**
Bank trail back to the UBO. Crypto-funded launches need the on-chain trail plus a CEX receipt.

- **Group structure chart with %-ownership at every layer**
Up to and including the ultimate natural person(s).

- **Audited or accountant-signed opening balance sheet**
Required even for newly incorporated entities.

Phase 4 — Compliance infrastructure (AML / CFT / RG)

Documentation alone won't pass; you need a working programme on day one.

- **Appoint a Money Laundering Reporting Officer (MLRO)**
Mandatory under LOK. The MLRO can be based in Curaçao or remote, but must have demonstrable AML qualifications and authority to file SARs.

- **Risk-based AML/CFT policy aligned to LOK + Curaçao FIU guidance**
Customer risk-rating model, EDD triggers, source-of-funds thresholds, ongoing monitoring rules.

- **KYC vendor selected and integrated (sandbox proof)**
Onfido, Sumsub, Veriff, Jumio, etc. Have screenshots of a successful KYC run in your test environment ready for the application.

- **Responsible-gambling toolkit**
Self-exclusion (incl. cool-off and permanent), deposit limits, reality checks, GamCare/equivalent links. The CGA expects working UI, not just a policy doc.

- **Player funds segregation policy**
Operating funds and player balances in separate accounts, with reconciliation cadence documented.

- **Complaints, ADR, and dispute-resolution process**
Named contact, 10-business-day SLA, link to CGA complaints procedure.

Phase 5 — Technical & game certification

GLI standards are the baseline. Map every component to a certificate.

- **RNG certificate from a CGA-recognised lab**
GLI, BMM, eCOGRA, iTech Labs all accepted. €383 per technical certificate request to the CGA.

- **Game certification per supplier, per vertical**
Slots, live dealer, table, sports each need their own evidence trail. Aggregator integrations don't shortcut this.

- **Platform security audit (ISO 27001-equivalent or pen-test report)**
Recent (<12 months), scoped to the production environment, with critical/high findings remediated.

- **Geo-blocking implementation for restricted jurisdictions**
Tested and evidenced. Curaçao license does not cover US, NL, FR, etc.

- **Server hosting and data-residency declaration**
Where production runs, where backups live, who has admin access.

- **Domain registration and primary URL declaration**
First domain included in license fee; €250 each for additional domains.

Phase 6 — Application, review, and post-grant

From file-submitted to live-and-monitored.

- **Submit through the CGA online portal with all PHD forms**
Application fee €4,592 due at submission. Incomplete uploads are returned, not held — restart the clock.

- **Plan for 8–16 weeks review**
Most clean applications close in 8–12. Build your launch timeline accordingly.

- **Respond to CGA RFIs within 10 business days**
Slow responses are a rejection signal. Have your counsel + MLRO on standby during review.

- **Pre-launch: technical inspection and seal of CGA logo**
License number and CGA mark must appear in your site footer.

- **Post-grant: file annual returns + supervisory fee**
€47,450 per year, plus statutory reporting on player numbers, GGR, AML alerts.

- **Maintain the local office and key-person headcount**
These are continuing obligations. Letting them lapse triggers license review.

■ **Watch-out:** About 38% of 2025 applications were rejected — almost always for thin AML documentation, paper-only local presence, or mismatched technical certificates. Resubmission means a new application fee.

What good looks like

A clean LOK application package — submitted only after every checkbox above is signed off by counsel and your tech provider — typically clears in **8–12 weeks**. The applications that get bounced into the 38% rejection bucket usually fail on three things:

- thin AML/KYC documentation that doesn't survive CGA scrutiny
- a paper-only Curaçao office with no real key person on the ground
- technical certificates that don't match the games actually integrated

Want a second pair of eyes on your application?

I've helped operators shape the corporate, AML, and CRM/Optimove side of iGaming launches across EU and LATAM. If you'd like a 30-minute review of where you are in this checklist — no slides, no pitch — book a call.

Book a 30-min strategy call

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About this document

Compiled May 2026 from publicly available CGA guidance and current LOK implementing decrees. Fees and timelines change — always confirm with Curaçao counsel before you file. This document is informational only and does not constitute legal advice.