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To
Whomsoever Concern
Legal Opinion On Mad Falcon Enterprises (Cricin)

1. Description of the Company's Platform

Mad Falcon Enterprises is a Partnership Firm incorporated in India on 16th October 2023. The firm's registered office is located in Mahendragarh, Haryana, India. Mad Falcon Enterprises operates the brand name "Cricin" with its associated App on Google Play Store & website cricin.in

The firm is engaged in the Information Technology Industry and holds an active status. Mad Falcon Enterprises is registered under the Goods and Services Tax (GST) regime with GSTIN 06ABYFM7909B1ZW.

The firm operates as a partnership entity and does not have shares.

2. Overview of the Company

Cricin, a venture of Mad Falcon Enterprises, operates as a dynamic skill-based gaming platform dedicated to cricket enthusiasts. Established in 2023, the platform swiftly emerged as a prominent player in the realm of cricket prediction gaming, offering a unique and thrilling experience to cricket fans globally.

Cricin is committed to providing an engaging platform where users can leverage their cricket knowledge and skills to make predictions on various cricket events such as IPL, T20 World Cup, and other cricket tournaments. Users have the opportunity to share their opinions on trade questions related to cricket matches, such as "Will Mumbai Win The Match vs Chennai?" Users can express their predictions with a simple "Yes" or "No" and even invest an amount on their prediction, allowing them to trade their opinions with other users on the platform.

Similar to other skill-based gaming platforms such as MPL Opinio, Cricin organizes and hosts daily prediction challenges, offering exciting rewards to participants. The platform welcomes users of all skill levels, providing them with an opportunity to showcase their cricket expertise and compete against others while enjoying the thrill of cricket prediction gaming.

3. Prediction Accessibility on Cricin

To access the prediction features on Cricin, users are required to first sign up on the Cricin app. Upon signing up, users need to verify their mobile number through OTP and proceed to register by providing their name and email. Once registered, users can begin submitting free predictions.



However, for users interested in submitting paid predictions, they must first activate their Cricin wallet. To activate the wallet, users need to complete the Know Your Customer (KYC) process. This involves verifying their PAN card and Aadhaar card. Additionally, users must be at least 18 years old, as indicated in their age documents. It's important to note that users from states where real money gaming apps are banned are not eligible to complete the KYC process.

Once the KYC process is successfully completed, the user's wallet will be activated. Users can then deposit cash into their wallet to recharge it. The deposited amount can be used to submit paid predictions. In the event of a win, the user can withdraw their winnings to the bank account linked to the KYC-verified account holder.

After completing the KYC process and recharging their wallet, users can navigate to the home page of the app. Here, they can click on the tile corresponding to the cricket match they are interested in. They can then submit their predictions for the trade question related to that match.

Cricin ensures that users can seamlessly access prediction features while adhering to necessary verification and regulatory processes to maintain a safe and fair gaming environment.

4. Key Activities of Cricin

Cricin specializes in offering prediction opportunities for cricket enthusiasts, focusing on major cricket events worldwide, including:

- IPL
- T20 World Cup
- One Day World Cup
- Domestic Cricket Leagues
- International Cricket Leagues

These events provide users with diverse prediction options, enhancing their engagement and enjoyment on the platform.

5. Legality of Operating Cricin Gaming Application

Cricin, operated by Mad Falcon Enterprises, ensures legal compliance and transparency in its operations, similar to other skill-based gaming platforms like Sixer. Here's how Cricin maintains legality and facilitates a comprehensive analysis for users:

Ownership and Operation: Mad Falcon Enterprises owns and operates the Cricin platform, including the website cricin.in and the Cricin mobile application. The platform offers a skill-based prediction gaming experience centered around cricket events.

Nature of the Game: Cricin provides users with a platform to make predictions based on their cricket knowledge and analytical skills. Users can analyze various factors such as player



performance, historical data, pitch conditions, and team compositions to make informed predictions.

Legal Framework: Cricin operates within the legal framework established by Indian laws, including the Public Gambling Act of 1867. Indian laws differentiate between games of skill and games of chance, with skill-based games being exempt from gambling regulations.

State Legislation: While most states in India permit skill-based gaming activities, some states may have specific regulations regarding gaming and gambling services. Cricin adheres to state legislations and may restrict participation from states where such activities are prohibited or regulated.

Eligibility: Cricin ensures compliance with state regulations by restricting participation from states where skill-based gaming for money is not permitted or restricted without a license. Users from states like Andhra Pradesh, Telangana, Assam, Sikkim, and Nagaland, where skill gaming is restricted, may not be allowed to participate in Cricin's prediction gaming.

Comprehensive Analysis: Cricin empowers users to perform thorough analysis before making predictions. Users can evaluate factors such as current player form, past performance, match venue, pitch conditions, weather forecasts, team strategies, and head-to-head statistics. Additionally, users can track live match updates and assess player performance in real-time to make informed decisions.

Judicial Precedents: Indian courts have consistently recognized skill-based gaming platforms and their legality under Indian laws. The Supreme Court of India has emphasized the distinction between games of skill and games of chance, providing legal clarity to such platforms.

In summary, Cricin maintains legality by operating as a skill-based prediction gaming platform, adhering to Indian laws and regulations, and ensuring transparency and compliance with eligibility criteria for users. The platform enables users to conduct comprehensive analysis and make informed predictions based on various cricketing factors. Similar to MPL Opinio, Cricin provides a legal and enjoyable gaming experience for cricket enthusiasts in India.

6. Compliance with Prize Money and Refund Policy

Cricin, operated by Mad Falcon Enterprises, prioritizes compliance with prize money distribution and maintains a transparent refund policy for its users. Here's how Cricin ensures compliance in these aspects:

Prize Money Distribution: Cricin diligently adheres to its prize money distribution policy, ensuring that winners receive their rewards promptly and fairly. Upon the conclusion of prediction



challenges or tournaments, prize money is disbursed to the respective winners' accounts in accordance with the platform's terms and conditions.

Transparency: Cricin maintains transparency in its prize money distribution process by providing clear guidelines and notifications to users regarding the eligibility criteria for winning prizes, the amount of prize money allocated for each challenge or tournament, and the mechanism for claiming rewards.

Refund Policy: Cricin implements a refund policy that protects users' interests and ensures a satisfactory gaming experience. In the event of any technical glitches, errors, or unforeseen circumstances that affect the fairness or integrity of prediction outcomes, Cricin reserves the right to refund users' entry fees or stakes as per its refund policy. (<https://cricin.in/refund-policy/>).

Fairness and Integrity: Cricin prioritizes fairness and integrity in all aspects of its operations, including prize money distribution and refund processes. The platform employs robust security measures and conducts regular audits to prevent fraudulent activities and maintain the trust and confidence of its user community.

User Support: Cricin offers dedicated customer support services to assist users with any queries, concerns, or issues related to prize money distribution, refunds, or any other aspect of the gaming experience. Users can reach out to the support team through various communication channels for prompt assistance and resolution.

In summary, Cricin maintains strict compliance with prize money distribution regulations and upholds transparency and fairness in its refund policy. By prioritizing user satisfaction and maintaining clear communication channels, Cricin ensures a positive and trustworthy gaming environment for its users.

7. Skill vs. Chance Games Analysis

Cricin, operated by Mad Falcon Enterprises, distinguishes itself as a platform predominantly offering skill-based prediction gaming experiences. Here's a comprehensive analysis highlighting the distinction between skill-based and chance-based games:

1. Skill-Based Gaming:

- **Definition:** Skill-based games, such as those offered on Cricin, are characterized by outcomes that primarily depend on the player's knowledge, expertise, and analytical abilities rather than random chance.
- **User Involvement:** Skill-based games involve active participation from users who rely on their cricket knowledge, statistical analysis, and strategic thinking to make informed predictions.



- **Factors Considered:** Players on Cricin analyze various cricketing factors, including player performance, historical data, match conditions, team compositions, and other relevant statistics to formulate their predictions.
- **Legal Recognition:** Skill-based gaming platforms like Cricin are recognized as legal and exempt from gambling regulations in India, as they are deemed to involve a substantial element of skill rather than chance.

2. Chance-Based Gaming:

- **Definition:** Chance-based games rely predominantly on random outcomes or luck rather than the player's skills or knowledge.
- **Limited User Control:** In chance-based games, users have limited control over the outcome, as it is primarily determined by random events or luck factors.
- **Examples:** Traditional casino games such as roulette, slot machines, and certain card games are considered chance-based, as the outcome is largely unpredictable and independent of player actions.
- **Regulatory Framework:** Chance-based games are subject to stricter regulations under gambling laws, as they involve a higher degree of uncertainty and risk for players.

3. Legal Distinction:

- **Indian Laws:** Indian laws, including the Public Gambling Act of 1867, distinguish between skill-based and chance-based games, with the former being exempt from gambling regulations.
- **Judicial Precedents:** The Supreme Court of India has consistently recognized skill-based gaming platforms as legal, provided they involve a significant element of skill rather than chance.

4. Cricin's Positioning:

- **Skill Emphasis:** Cricin emphasizes skill-based prediction gaming, where users leverage their cricketing knowledge and analytical skills to make informed predictions on various cricket events.
- **Legal Compliance:** By operating as a skill-based gaming platform, Cricin ensures compliance with Indian laws and regulations governing gaming activities, thereby providing a legal and enjoyable gaming experience for its users.

In conclusion, Cricin distinguishes itself as a skill-based prediction gaming platform, aligning with legal frameworks and offering users an engaging and rewarding gaming experience based on their cricket expertise and analytical abilities.



8. Difference Between Games of Skill vs. Games of Chance

Under the Indian legal framework, a clear distinction exists between games of skill and games of chance, determining their legality and regulatory treatment.

1. Definition:

- **Games of Skill:** These games rely predominantly on the player's skill, knowledge, strategy, and decision-making abilities to determine the outcome. Success in such games is primarily driven by the player's proficiency rather than random chance.
- **Games of Chance:** In contrast, games of chance are those where the outcome is primarily dependent on luck, random events, or unpredictable factors beyond the player's control.

2. Legal Clarifications:

- **Supreme Court Precedents:** The Hon'ble Supreme Court of India has provided significant clarifications on the distinction between skill-based and chance-based games. In cases like *State of Andhra Pradesh v K. Satyanarayana & Ors.* and *State of Bombay v R.M.D. Chamarbaugwala*, the Court emphasized that games where success relies more on skill than chance do not qualify as gambling but are recognized as games of skill.
- **Rummy Case Analysis:** The Supreme Court, in the case of *State of Bombay v R.M.D. Chamarbaugwala*, evaluated the game of rummy in terms of skill versus chance. It ruled that rummy is a game of skill, distinct from chance-based games like "Teen Patti Flush." The Court highlighted the strategic elements of rummy, such as card sequence memorization and strategic card selection, which require significant skill.

3. Judicial Rulings:

- **Nala Sports, Narpani Mandram v State of Tamil Nadu:** The Madras High Court, in this case, ruled that certain games such as chess and carom, even when involving consideration (club fees), did not constitute gambling. These games were predominantly deemed games of skill and exempted under the Gambling Act, 1867.

4. Regulatory Landscape:

- **State Jurisdiction:** In India, states have exclusive authority over regulating betting and gambling, as per Entry 34, List II of the Constitution. Consequently, there is no uniform law governing the gaming sector, leading to varying legal stances adopted by different states.
- **Central Government Intervention:** The central government has intervened to assign specific responsibilities to gaming entities through amendments to the Information Technology Act, 2000, and the Information Technology (Guidelines for Intermediaries and Digital Media Ethics Code) Rules, 2021.

In summary, the distinction between games of skill and games of chance plays a crucial role in the Indian legal landscape, with skill-based games being recognized as legal and exempt from gambling regulations, as affirmed by judicial precedents and regulatory frameworks.



9. Restrictions & Key State Legislation

Various states in India have enacted specific legislation governing the legality of betting, gambling, and games of skill. The legal framework varies across states, and here are some key aspects of state legislation:

9.1 Assam Game and Betting Act, 1970 (Assam Act):

This legislation in Assam prohibits bets or invitations to bet within the state. It does not differentiate between games of skill and games of chance. Any game or sport involving playing for money or valuable securities is prohibited.

9.2 Orissa Prevention of Gambling Act, 1955 (Orissa Act):

Similar to the Assam Act, the Orissa Act also prohibits playing games for money or other stakes. However, it grants the State Government the authority to exempt social clubs or parties engaged in games for bona fide recreational purposes from these restrictions.

9.3 Nagaland Prohibition of Gambling and Promotion and Regulation of Online Games of Skill Act, 2016 (Nagaland Act):

The Nagaland Act explicitly recognizes certain games, including poker and rummy, as games of skill. Once a license is obtained under this act, profits from such games are not considered gambling, provided the game is played by participants from areas where games of skill are permitted within India, except for states with specific restrictions.

Legal Interpretation:

Various high courts in India have upheld that games predominantly dependent on skill are generally not considered gambling activities but rather business activities. Most state acts related to gambling, except in states like Assam, Telangana, and Orissa, specifically exclude games of skill from the scope of gambling.

10. Conclusion: Based on decisions by the Supreme Court and various high courts, games where skill plays a significant role are classified as games of skill. These games fall under the exception of Section 12 of the Public Gambling Act and similar state acts, making it legally permissible for clubs, institutions, and websites to offer such skill-based games for monetary stakes. In the absence of specific prohibitions in any state against online betting or wagering on games of skill, there should be no legal basis to prohibit such activities in India.



- 11. Final Opinion:** After a comprehensive review of the legal framework and operational structure of Cricin, it is our definitive conclusion that Cricin is legally compliant. Moreover, Cricin does not require an RNG (Random Number Generator) certificate as it operates solely on skill-based cricket prediction activities.

In Cricin, users engage in cricket prediction activities where success is determined by their cricket knowledge, analytical skills, and strategic decision-making abilities. There is no involvement of RNGs in the prediction process, making the acquisition of an RNG certificate unnecessary for Cricin's operations. Therefore, Cricin stands as a legal and compliant platform in the domain of skill-based cricket prediction games.

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