



WRITTEN STATEMENT OF

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I. Introduction

Chairman Cruz, Ranking Member Cantwell, Chair Blackburn and Ranking Member Hickenlooper, and Members of the Subcommittee, thank you for the opportunity to appear before you today. My name is Scott Sadin and I serve as Co-Founder and Co-Chief Executive Officer of Integrity Compliance 360 Inc., known as IC360, a global regulatory technology and compliance firm specializing in comprehensive integrity solutions for participants in sports, sports betting and daily fantasy, gaming, iGaming, and prediction markets. As an independent sports integrity firm, we work with professional leagues, collegiate conferences and member institutions, state regulators, licensed sports betting operators, event contract platforms and other stakeholders across the integrity ecosystem.

I am grateful to the Subcommittee for its sustained attention to this important set of issues and for the opportunity to be here on behalf of IC360. The legalization and expansion of regulated sports betting and event contracts on sports in the United States has created meaningful opportunities and new challenges for those of us focused on the integrity of competition. My intent today is to describe who IC360 is, the participants in the integrity ecosystem with whom we work, and the products and services through which we contribute to protecting the integrity of sport.

The views expressed in this statement are my own and reflect my experience through my tenure at IC360. They do not represent the views of any leagues, regulators, operators, or institutions with whom we work. I welcome the Subcommittee's questions and the opportunity to provide any additional information that may be useful as it continues its work on these issues.

II. My Background

I serve as Co-Founder and Co-Chief Executive Officer of IC360. I have had the privilege of building IC360 from an early-stage company into what it is today - one of the most extensive independent integrity, compliance, and regulatory technology firms operating in the U.S. sports and gaming space. IC360 offers over a dozen products and services and has more than two hundred partner organizations globally.

My path to this work began in financial services. Earlier in my career, I held compliance and surveillance roles at registered investment advisers and alternative investment managers, including Apollo Global Management and MSD & BDT Partners. The discipline of trade surveillance — building systems that detect anomalous patterns across vast data sets in real-time and investigating those patterns with care and consequence — translated directly to the work of monitoring legal sports betting markets when that opportunity emerged.

What has kept me in this field, and what I hope comes through in these remarks, is a personal conviction about the importance of our commitment to this work. I have been on the front lines of dozens of sports integrity investigations over the years — matters that have touched professional and collegiate athletes, officials, coaches, and at times the broader public — and I have seen, at close range, the value IC360 has brought in both identifying and investigating integrity-related circumstances. I am personally committed to ensuring that the integrity infrastructure protecting competitions and events keeps pace with the market that has matured around it, and that commitment is the lens through which I offer the observations that follow.

III. Core Concepts

Before I provide detail about IC360's products, I felt it important to emphasize the following two core concepts with respect to the integrity monitoring ecosystem:

1. In the years since the Supreme Court's 2018 decision in *Murphy v. NCAA*, a functioning and comprehensive framework has developed across sports leagues, regulators, licensed operators, and independent integrity providers. That framework has identified, investigated, and resolved a meaningful number of integrity matters — from suspicious wagering patterns and the misuse of insider information to active match-fixing inquiries — and has done so in ongoing coordination with state and federal authorities, and law enforcement where appropriate. The infrastructure exists and it has been effective. The conversation before the Subcommittee today, in my view, should be framed not as a question of whether such an infrastructure should exist, but as a question of how it should continue to mature, evolve and improve.

2. One core principle has remained constant throughout the evolution of regulated sports betting: no singular sports league, sportsbook operator, regulatory body, or supplier can successfully tackle the complex and nuanced sports integrity landscape alone. It requires strong engagement, collaboration and transparency across those differentiated stakeholders to combat bad actor innovation. Any improvement to the existing sports integrity framework should focus on increasing the connective tissue between those market participants.

Everything we do at IC360 is informed by these core principles. We recognize that the work of maintaining proactive monitoring requires sustained investment in new detection capabilities, new data sources, new analytical methods, and new forms of cross-stakeholder coordination. That is a permanent and evolving feature of this work, not a phase of it.

IV. About IC360 — Who We Are, Whom We Serve, and Why This Work Matters

At IC360, our mission is direct and durable: to assist the successful maturation of the regulated sports betting and sports event contract ecosystem through products and services that protect the integrity of sport. Everything we do is in service of that mission.

We work with more than 200 organizations globally. Our client base includes each of the seven major United States professional sports leagues, a growing list of emerging professional properties, and 12 Division I collegiate conferences, including each of the Power 4 conferences. We also work with more than 125 licensed sports betting and daily fantasy sports operators, 14 prediction-market exchanges, and numerous regulators and law enforcement agencies across the United States and abroad.

The breadth of that client base is, in our view, the precondition for credible integrity work — and it confers a particular vantage point on the issues before this Subcommittee. We see, on a regular basis, the specific and often unique integrity challenges that each category of stakeholders are facing. That cross-stakeholder visibility, handled with care, allows us to identify patterns, risks and emerging vulnerabilities. One of our central responsibilities is to bring those insights back to the stakeholders best positioned to act on them. Our positioning

as an independent integrity provider affords us the opportunity and responsibility to assemble a picture from across the ecosystem, route the right information to the right party, and assist in converting the resulting signals into action.

A key differentiator for IC360 is that we operate conflict-free. IC360 does not offer trading, odds creation, risk management, or any product whose interests could be affected by the outcome of an integrity matter we are monitoring. Our products exclusively work to enhance the compliance and integrity ecosystem. That posture matters not because the operators, leagues, and regulators with whom we work are anything less than fully committed to integrity — they are, and many invest substantial resources of their own in these endeavors — but because the credibility of the picture we produce depends on the absence of competing interests in producing it.

This approach allows us to function as the connective tissue across the integrity ecosystem. We often sit between leagues and operators on credible suspicious-betting alerting. We work closely with governance bodies and operators on prohibited bettor and trader identification. We collaborate with regulators and licensed platforms when circumstances warrant further investigation. The strength of the integrity infrastructure in this country is a function of how well that connective tissue holds — how much information flows through it, how reliably, and how comprehensively. The more engagement, collaboration, and transparency among leagues, operators, integrity providers, regulators and law enforcement, the more protected the integrity of competition is.

V. IC360's Products and the Value They Bring

With that framing in mind, I want to briefly describe the three principal lines of work through which IC360 contributes to the connective tissue I have described.

A. Integrity Monitoring

Integrity monitoring refers to the twenty-four-hour-a-day surveillance of regulated betting markets globally for indications that something has occurred, or is occurring, outside the normal patterns of wagering, event

contracts and competition. It is the work most often associated with our category, and it is the work that has produced many of the integrity outcomes the public has come to expect of a well-functioning regulated market.

The picture we build rests on four principal categories of data, and our analytical method rests on identifying correlated anomalies and emerging trends across them.

- 1. Market odds and pricing.** Movements in betting odds and event contracts are the most immediately legible signal that something in a market may warrant further investigation. Significant, unexplained movement — particularly in directions inconsistent with publicly available information — can often be the first indication that an alert is appropriate.
- 2. Bet-level detail.** IC360 ingests bet-level data directly from a meaningful subset of licensed sportsbooks covering wagering activity on their platforms. This level of detail is essential to identifying coordinated activity, repeat patterns, and platform-specific anomalies that aggregate market odds and price data alone cannot reveal.
- 3. Availability information.** We track news and other open-source data related to the availability of impactful athletes and coaches — injuries, absences, and other status changes. Significant market movement in advance of the public release of availability information on an impactful figure can indicate the misuse of inside information, a circumstance that warrants close investigation.
- 4. Officiating statistics.** We collect publicly available data on officiating performance and use it to develop behavioral profile patterns on as many officials as we can. A meaningful deviation from their established behavioral norm is an analytical signal — and one that is often cross-referenced against the other categories of data above.

Anomalies, of course, occur constantly across each of these categories in isolation. What our analytical work looks for is the correlated abnormality — the situation in which signals across several of these categories cluster

around a single event, market, or actor — and the trend formation in which a series of such clusters point toward a potentially sustained vulnerability.

Alerts on our platform are generated through three principal pathways:

1. IC360's own identification of circumstances warranting further investigation, derived from the cross-category analysis described above.
2. Operator-initiated reporting of suspicious activity observed on the operator's own platform, which the operator routes to its independent third-party integrity monitor for further analysis and dissemination across the ecosystem. These notifications are critical since IC360 is ultimately limited to what data it is afforded. We consistently recommend our operator partners be overly inclusive in reporting.
3. Regulatory or other governing-body identification of potentially suspicious activity.

When an alert is generated, IC360 distributes the relevant details and a structured survey to operators across the ecosystem. The survey asks, among other questions, the following:

- Whether the market in question was offered on the platform;
- Whether the volume in that market was outsized relative to expectations;
- Whether previously dormant accounts were transacting in the market in question;
- Whether new account openings appeared to target the market in question; and
- Whether any flagged or marked patrons were transacting in the market in question.

The IC360 system parses the responses into a consolidated report that gives the relevant stakeholders — typically the affected league or governance body, and, where appropriate, regulators and law enforcement — a comprehensive and holistic view of the matter, including whether the suspicious activity appears isolated to one operator or one market or, instead, is widespread across the ecosystem. Both the willingness of operators to report suspicious activity to their independent monitors in the first instance, and their complete and timely responsiveness to surveys when alerts are circulated, are of paramount importance to the integrity of regulated

competition. The work is collaborative, and the quality of the resulting picture is a direct function of how fully participants engage.

B. ProhiBet

Prohibited patrons across U.S. sport often refers to persons who should be prohibited from betting or trading on certain events who, by virtue of their role, have regular access to non-public information about a competition, or who have the consistent ability to exert undue influence over its outcome. These include, in most sports, athletes — both professional and collegiate — coaches, referees, athletic trainers, administrators, and certain associated individuals. Each governing body, league, and member institution maintains its own designation of prohibited patrons, and those designations are foundational to the integrity rules of the relevant sport.

IC360's ProhiBet platform is the secure technology infrastructure through which prohibited-patron information moves from a list manager — typically a sports governing body — to a platform on which such individuals could otherwise transact, including sportsbooks, prediction markets, and daily fantasy sports platforms. The information exchanged between those parties through the ProhiBet platform is cryptographically hashed, so that the personal identifying information of designated individuals never leaves the list manager's environment. With that infrastructure in place, operators can proactively permission the accounts of prohibited patrons before any wager or prohibited transaction is placed — ensuring that those individuals are not able to transact in markets where they may possess inside information, exert undue influence or are regulatorily prohibited from doing so. Engagement with this technology solution enables a preemptive form of permissions that is, in our experience, among the most consequential single contributions a stakeholder can make to proactive integrity monitoring.

The ProhiBet platform today supports more than 150 stakeholders, has performed close to one billion account checks, and has surfaced more than sixty thousand alerts. Each of those metrics reflect a category of harm that did not occur because the infrastructure to prevent it was in place.

C. Education

IC360 recognizes the importance of education and awareness training for stakeholders across the sports betting, daily fantasy sports and event contract ecosystems. The availability of high-quality onsite and digital education resources to sports property stakeholders — athletes, coaches, officials, administrators, and support personnel — is, in our experience, among the most valuable interventions in preventing bad actors from compromising competition integrity.

Our curriculum covers, among other topics, integrity-related case studies, bad-actor profiles, and emerging vulnerabilities. We have delivered hundreds of presentations and have reached hundreds of thousands of athletes, coaches, and administrators, through both in-person training and our digital learning platform. The curriculum is regularly refreshed — for the reasons I described earlier about the pace at which the threat environment evolves — and is delivered in close partnership with conference compliance offices, league integrity teams, and individual member institutions. It is, like the other lines of work I have described, fundamentally a collaboration.

D. The Centrality of Collaboration

I want to close this section on the same note with which I opened it; each of these three lines of work depends on collaboration. Integrity monitoring works because operators report information, leagues share intelligence, and regulators share casework. Prohibit works because governing bodies designate, operators screen, and the infrastructure between them is trusted. Education works because leagues and institutions invest the time and attention of the people closest to competition. The value we believe IC360 brings is, in the end, the role we play in making the collaborative work of integrity possible at the scale and speed that the contemporary market requires.

VI. Conclusion

I want to thank the Subcommittee again for its attention to these issues and for the opportunity to share these perspectives on behalf of IC360. The work of protecting the integrity of competition in an environment of rapidly expanding legal sports betting and sports event contracts, in our experience, is neither glamorous nor easily

reducible to a single intervention. It is instead the steadfast commitment to ensuring that the right information moves to the right party at the right time, that the rules of every sport remain enforceable in complex markets, and that the people closest to competition have the awareness and the tools to surface concerns when they arise.

That work depends on leagues, operators, regulators, and independent integrity providers continuing to invest in collaboration with one another. I am thankful for the cooperation and collaboration we receive from our stakeholder partners across the sports betting and sports event contract ecosystems and for their willingness to adapt as these industries evolve. We are committed, for our part, to playing the role we are positioned to play. I welcome the Subcommittee's questions and look forward to supporting its continued attention to these issues in whatever way is most useful.