May 27, 2025

Submitted Electronically
secretary@cftc.gov

Mr. Christopher J. Kirkpatrick
Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: Sports Event Contracts Listed on CFTC Markets

Dear Mr. Kirkpatrick,

Please accept this letter submission made on behalf of Genius Sports Limited ("**Genius Sports**" trading as GENI: NYSE), describing our sports data services and sharing our perspective on sports events contracts traded on CFTC-registered designated contract markets ("**DCMs**"). We thank the Commodity Futures Trading Commission (the "**CFTC**" or "**Commission**") for considering our comments as a major stakeholder in the sports markets industry, and we very much look forward to continuing to engage with the Commission on sports market issues.

Genius Sports[1] is a global leader in sports technology, data, and integrity services. We work directly with over 400 sports organizations – including the NFL, NCAA, EPL, and FIBA – to collect, distribute, and commercialize official sports data in real time. Our technology powers many regulated sports markets in the United States and globally and provides real-time integrity monitoring for many of the major sports leagues worldwide. We have a unique vantage point sitting at the intersection between regulated sports markets, technology infrastructure, and sports governance.

We recognize sports event contracts traded on CFTC-registered DCMs as an area of significant potential growth and innovation. Further, as experienced stakeholders in regulated sports betting markets, we deeply understand the importance of structuring sports-related products around clarity, consistency, and integrity for the offerors of such products, services providers, and end-users.

As the Commission knows, many sports markets in the United States have traditionally been governed by a robust ecosystem of state-based regulation. Not unlike the CFTC's approach to traditional markets regulation, the current state-based regulations impose significant obligations on their licensees to ensure consumer protection and product and data integrity, including, but not limited to: (i) 'know-your-customer' and anti-money laundering checks, (ii) program design and educational initiatives to support responsible and informed customer behavior, (iii) age and location verification requirements, and (iv) integrity monitoring. Many of the state-based regimes also require both the

[1] See more at: https://www.geniussports.com/.

sports market providers and certain classes of their vendors to register with and obtain licenses from the regulator.

Through our official partnerships with various sports leagues and platforms, as well as significant investments in upholding integrity and safeguarding our product offerings, Genius Sports has seen first-hand the benefits to the sports and sports markets industry of a framework that fosters these principles. As previewed above, we also recognize that CFTC-registered DCMs and the brokers bringing traders to those venues are subject to many of the same standards and principles as state-regulated sports markets venues, including robust KYC/AML obligations, market surveillance programs, information sharing programs with underlying marketplaces, contract integrity, customer protection requirements, and customer disclosure obligations. Market surveillance is of particular importance because a DCM must ensure that its contracts are not readily susceptible to manipulation. We believe that it is critical – as DCM-offered sports event contract markets grow – for the CFTC to consider and evaluate the protections unique to the state-based sports markets regulatory regimes, especially protections around sports integrity. Ensuring data integrity and the integrity of the underlying sporting events is essential to validating and being able to conclude that a sports event contract is not readily susceptible to manipulation.

Genius Sports has watched with interest as DCM-offered sports event contracts continue to proliferate and as courts and various regulators continue navigating a range of jurisdictional issues. Without attempting to solve in this letter the jurisdictional considerations underway, we do believe that it is practical to observe that the sports gaming taking place on state-licensed sports markets (traditionally referred to as sports betting) is (in many respects) equivalent to DCM-listed sports event contracts. Following from that straightforward observation, we also believe that solving for risks related to data and sports integrity is a critical component to address for CFTC / DCM-listed contracts. In parallel, we agree with concerns already put forward by sports organizations to the CFTC that these risks will increase exponentially if and when in-play and player proposition or other individual performance-based markets are offered on DCMs as sports event contracts in due course.

We are confident that a Federal regulatory approach to sports markets, led by the CFTC, can foster continued growth and innovation within sports event contracts in a responsible way, and we want to support the next steps by offering and sharing our learned experiences and expertise with the agency. The CFTC should take advantage of the opportunity to leverage and incorporate the unique features embedded within the state-based sports markets regulatory regimes, particularly those related to customer protection and sports integrity, to ensure that these contracts are not readily susceptible to manipulation.

At Genius Sports, we have long-standing experience working within regulated sports markets, supporting all participants in the ecosystem in promoting compliance, upholding integrity, and enabling innovation through technology. We welcome the opportunity to engage further with the CFTC, participate in roundtables, offer thoughts in meetings with staff, and generally be proactive in contributing our expertise to this important policy discussion. Thank you for your consideration, and please do not hesitate to reach out with any questions.

Sincerely,

Tom Russell
Chief Legal Officer
Genius Sports Group

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