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Senate Commerce Committee
554 Dirksen Senate Office Building
Washington, DC 20510

Re: No Sure Bets: Protecting Sports Integrity in America

Introduction – Prediction Markets Sports Contracts are Gambling Products

Chairman Cruz, Chairman Blackburn, Senator Cantwell, Senator Hickenlooper, and members of the Subcommittee on Consumer Protection, Technology, and Data Privacy, thank-you for the opportunity to testify about this timely and consequential issue and for your consideration of the mental health consequences of the unprecedented expansion of sports gambling in America. Make no mistake, the unprecedented expansion of sports gambling, through online platforms and prediction markets, has created a mental health crisis similar to what the country experienced with the opioid industry. We stand at the precipice of a mental health disaster impacting the lives of children, young adults, individuals, and families throughout the country. Time is of the essence for Congress to recognize the magnitude of the problem and take decisive action to install common sense federal safety standards governing sports gambling in America.

Before examining the scope and magnitude of this mental health crisis it seems prudent to address the procedural question of whether prediction markets offering action on sporting events constitute gambling. With appropriate respect to our federal and state courts, which are presently addressing the issue in several jurisdictions, there is no doubt that prediction market contracts on sports are gambling. There is a plethora of reasons that prediction markets on sports are gambling. I will highlight the overriding factors which demonstrate that sports prediction markets constitute gambling on sports.

Sports prediction markets meet the universally accepted and plain meaning definition of gambling. Sports gambling is defined as the betting or staking of something of value, with consciousness of risk and hope of gain, on the outcome of a game, a contest, or an uncertain event whose result may be determined by chance or accident or have an unexpected result by

reason of the bettor's miscalculation.¹ This definition precisely describes what prediction markets offer to the public in the form of sports gambling futures contracts. The public is induced by a market maker to wager and risk money on the unknown outcome of a sporting event or micro portion thereof. The financial risk in pursuit of greater reward predicated on an unknown outcome in a game, contest, or match is gambling.

Prediction market companies wrongly suggest that because the "house" takes its cut off the top of the wager rather than on the outcome of the game, sports predictions somehow do not constitute gambling. The fatal flaw in this argument is well-illustrated by the game of poker. It is played in casinos all over the world. In every casino, the house takes its cut (known as the "rake") off the top of each hand/pot. This is the same model utilized by prediction market companies offering gambling contracts on sports. It is also like parimutuel gambling where bets are pooled and divided according to outcome minus what the house keeps as its fee or "takeout."

Next, for the American public, there is no discernable difference between prediction markets and online gambling companies when it comes to sports gambling. Both are gambling; plain and simple. Wagers are placed on sporting events or micro portions thereof; there are winners and losers; access to action never stops; and the house (the prediction market platform) always wins. Prediction markets offering sports futures contracts deliver the known addictive product of gambling² to the public in an increasingly dangerous form and doing so in partnership with other gambling companies and the sports leagues themselves. Such is the gambling business model.

The gambling industry itself has conclusively demonstrated that sports prediction markets constitute sports gambling. Sports gambling market leaders DraftKings and FanDuel have quickly become the first two online sports gambling platforms to openly embrace prediction markets and target the public with this latest form of sports gambling. According to DraftKings CEO, Jason Robbins, prediction markets are sports gambling:

Our core business is strong, and profitability is inflecting. That gives us the firepower to press our advantage in Predictions. With our Super App, market making capabilities, proprietary exchange, and combos coming together, we intend to establish a leadership position in Sports Predictions before year-end..."

... We have also launched market making, which unlocks access to an additional layer of the value chain. Market making is already generating a positive return for us. In the coming weeks, we expect to launch our proprietary exchange and to begin offering combos. Together, these moves will

¹ Glimne, Dan. "gambling". Encyclopedia Britannica, 13 May. 2026, <https://www.britannica.com/topic/gambling>. Accessed 15 May 2026.

² American Psychiatric Association. (2013). Diagnostic and statistical manual of mental disorders (5th ed.). doi.org. Disorder code 312.31 (F63.0).

accelerate innovation, improve the customer experience, and strengthen our economics.³

Mr. Robbins is not alone in his direct acknowledgement that sports prediction markets constitute gambling on sports. Peter Jacobson, CEO of Flutter, Inc (parent of FanDuel) is even more bold with his clear assertion that prediction markets are gambling products:

We believe our world-class, proprietary pricing capabilities can also unlock a significant market-making opportunity. In April, we began trialing market-making services on a major, third-party prediction market platform. Early indicators have been encouraging, and we expect to launch our market-making platform in the coming months...

...market making is an exciting opportunity, and I think it is a great way to showcase the quality of our pricing capabilities that we have in the business more generally. When we think about the opportunities, it is principally around combos, and we are going to be market making on as many platforms as we can. I think it is a good opportunity for us to monetize our pricing expertise in doing so.”⁴

This aggressive move by FanDuel to expand its sports gambling with prediction markets is a further push by its owner, Flutter, the world’s top sports gambling company, to dominate sports gambling here in America. In Europe, Flutter has launched BetFair Predicts, a global prediction market enterprise offering gambling contracts on sports, politics, and entertainment.⁵ The stated purpose of BetFair Predicts is to coordinate with FanDuel in America and offer worldwide sports prediction market gambling.⁶ This expands Flutter/FanDuel’s role in prediction market gambling by positioning the company as market makers, i.e. the gambling house setting the odds for sports contracts.⁷ This is yet another example of how the gambling prediction markets are inherently part of the gambling industry business model.

Even more chilling is how brazenly Flutter/FanDuel seeks to extract more losses from the American public. In an investor day conference, the FanDuel CEO and CFO openly discussed strategies to target gamblers with bonus bets to keep people more aggressively engaged with its sports gambling/prediction markets:

³ Steve Ruddock, “Burning Down the House: Prediction markets are peer-to-peer, but increasingly the “peer” on the other end is looking more and more like a sportsbook.” Straight to the Point. May 11, 2026.

<https://straighttothepoint.substack.com/p/burning-down-the-house>

⁴ Id.

⁵ Rob Fletcher, “Flutter bet launches Betfair prediction markets product.” Next IO News, April 9, 2026.

<https://next.io/news/prediction-markets/flutter-beta-launches-betfair-prediction-markets/>

⁶ Justin Byers, “Flutter CEO vows to ‘sharpen’ execution as FanDuel undergoes changes.” SBC Americas, May 12, 2026. <https://sbcamericas.com/2026/05/12/flutter-ceo-fanduel-changes/>

⁷ Finance Magnates, “FanDuel owner Flutter is making money from prediction markets as a market maker.” Trading View News, May 7, 2026. <https://www.tradingview.com/news/financemagnates:43599d90b094b:0-fanduel-owner-flutter-is-making-money-from-prediction-markets-as-a-market-maker/>

“If we look back at last year, it was very evident, with the benefit of hindsight, that we were slightly inefficient in our generosity approach...

... We’ve got our team from sports betting working with our financial team to make our generosity deployment more efficient, so we get more bang for our buck in the U.S.”⁸

This means that FanDuel plans to expand its online sports and prediction market gambling loyalty program to all online sports wagering markets by the start of the upcoming NFL season.

To remove even a scintilla of doubt as to whether prediction markets constitute gambling, we need to look no further than the uncontroverted data regarding gambling losses. Thus far in 2026, people in America have lost more than \$100 million on Kalshi prediction markets just by gambling on sports parlays (which Kalshi calls “combos”).⁹ The hold rate (amount won by Kalshi from these wagers) is an astonishing 15% and sports parlays now account for nearly 23% of wagers on the Kalshi platform.¹⁰

In January 2025, Kalshi launched sports gambling futures contracts in all fifty states.¹¹ This was despite the fact that sports gambling was, at that time, legal in only thirty-eight states.¹² At its launch, Kalshi boldly proclaimed itself the “First Nationwide Legal Sports Betting Platform.”¹³ Advertising on social media, including Instagram and Tik-Tok, announced the arrival of “The First Nationwide Legal Sports Betting Platform,” making “Sports Betting Legal in all 50 States on Kalshi.”¹⁴

Initially, the online gambling industry shrugged off the launch of sports gambling futures contracts. This did not last long as Kalshi and other prediction market platforms became increasingly aggressive in their marketing approach to sports gambling futures contracts. In November 2025, Fanatics Sportsbook, FanDuel, and DraftKings resigned membership in the American Gaming Association (“AGA”) because of a desire to add sports prediction market

⁸ Justin Byers, “Flutter CEO vows to ‘sharpen’ execution as FanDuel undergoes changes.” SBCAmericas, May 12, 2026. <https://sbcamericas.com/2026/05/12/flutter-ceo-fanduel-changes/>

⁹ Bernstein and Akabas, “Kalshi retail bettors have lost \$100m+ on parlays this year.” Sportico, May 13, 2026. <https://www.sportico.com/business/sports-betting/2026/kalshi-parlays-retail-bettor-losses-rfq-1234894471/>
¹⁰ Id.

¹¹ Purdum and Surendran, “How Kalshi and prediction markets are disrupting sports betting.” ESPN, June 2, 2025. https://www.espn.com/espn/betting/story/_/id/45377686/kalshi-prediction-markets-disrupt-sports-betting

¹² Id.

¹³ Benjamin Schiffrin, “Everyone should go on Kalshi and see for themselves whether it looks like sports betting or derivatives trading.” Better Markets, May 6, 2026. <https://bettermarkets.org/analysis/everyone-should-go-on-kalshi-and-see-for-themselves-whether-it-looks-like-sports-betting-or-derivatives-trading/>

¹⁴ *Ho Chunk Nation v Kalshi, Inc.* UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN, No. 25-cv-698 (August 28, 2025).

gambling to their online gambling products.¹⁵ Just one month later, all three online gambling platforms added prediction market gambling making sports gambling available in all fifty states and to anyone as young as eighteen.¹⁶

To further support the aggressive move to add prediction market gambling to their portfolio of online products, DraftKings, Fanatics, and FanDuel joined BetMGM and Bet365 as members of the gambling industry trade and lobbying group known as the Sports Betting Alliance (SBA) to advocate for sports gambling, including prediction market sports gambling, in all fifty states.¹⁷

As of May 2026, prediction markets are offering a wide variety of sports gambling contracts in every state. This now includes parlays (“combos”), same-game parlays and numerous forms of micro betting. During the recently completed 2025-26 football season, gambling on sports contracts accounted for nearly 50% of all action on the Kalshi platform.¹⁸ It is presently estimated by the gambling industry that on a weekly basis nearly 80% of all action on the prediction market platforms are sports gambling contracts.¹⁹

For the American public this amounts to a clear, convincing, and unmistakable conclusion; prediction markets, including Kalshi, Polymarket, DraftKings, FanDuel, and Fanatics have delivered online sports gambling to all fifty states, and the product is now available to youth starting at age eighteen.

There should be no doubt that sports prediction markets constitute gambling. Accordingly, all future references to the gambling industry herein include prediction markets.

Sports Gambling and Integrity of the Leagues -

This hearing is to examine among other issues, the impact of gambling and prediction markets on the integrity of sports in America. There can be no dispute; any business enterprise that gambling touches inherently undermines its integrity. This is particularly true when the business enterprise at issue is the American institution of professional and collegiate sports. This is not merely my opinion. Heed the words of National Football League (NFL) Commissioner Roger Goodell from his sworn deposition testimony:

¹⁵ Contessa Brewer, “FanDuel, DraftKings abandon AGA trade group as rift over sports prediction markets grows.” CNBC, November 18, 2025. <https://www.cnbc.com/2025/11/18/fanduel-draftkings-abandon-aga-memberships.html>

¹⁶ Tom Nightingale, “FanDuel Predicts live in all 50 states, adds sports in California and Texas.” SBCAmericas, January 15, 2026. <https://sbcamericas.com/2026/01/15/fanduel-predicts-all-50-states/>

¹⁷ Sports Gambling Alliance, “Mission Statement.” <https://sportsbettingalliance.org/about/>

¹⁸ Dan Bernstein, “DraftKings, Flutter stocks fall amid Kalshi parlay progress.” Sportico, September 30, 2025. <https://www.sportico.com/business/sports-betting/2025/draftkings-flutter-stock-kalshi-parlay-1234872516/>

¹⁹ Ryan Butler, “Prediction Market Volume Quadrupled in Past 2 Years, Report Finds.” Covers, March 13, 2026. <https://www.covers.com/industry/prediction-market-volume-quadrupled-in-past-two-years-report-finds-march-13-2026>

Q. And there you state that your most important responsibility is maintaining the **integrity** of professional football and preserving public confidence in the NFL. What threats are there to the **integrity** of pro football in the United States?

A. Gambling would be number one on my list.²⁰

This was not an isolated statement from the NFL Commissioner. In a subsequent affidavit filed, under oath and with penalty of perjury, the Commissioner affirmed that relationships with gambling companies severely damage the integrity and fabric of sports and irreparably harm long-standing bonds and cultural experiences enjoyed by sports fans and families:

The NFL cannot be compensated in damages for the harm that sports gambling poses to the goodwill, character, and **integrity of NFL Football**, and to the fundamental bonds of loyalty, and devotion between fans and teams that the league seeks to maintain. Once the character and **integrity of NFL Football** have been compromised, and the bonds of loyalty and devotion between fans and teams have been broken, NFL Football will have been irreparably injured in a manner that cannot be calculated in dollars (emphasis added).²¹

Although I am quoting NFL Commissioner Goodell, the recognition that gambling touching professional or collegiate sports inexorably destroys the integrity of our treasured athletic institutions was shared by the commissioners of every professional, collegiate, and amateur sports organization. This was recently addressed in the context of prediction markets by Alex Roth, Esq., assistant general counsel to the National Basketball Association:

The **integrity** risks posed by sports prediction markets are more significant and more difficult to manage than those presented by legal, regulated sports gambling,²²

The word “*integrity*” must remain at the epicenter of the discussion when considering the urgent need for federal oversight of the sports gambling industry, including prediction markets.

Integrity is defined as “the quality of being honest and having strong moral principles that you refuse to change.”²³ Obviously, the sports leagues failed the *moral principles that you refuse to change* piece of the integrity test as the lure of taking fans’ gambling money quickly motivated every conceivable sports league, and the National Collegiate Athletic Association (NCAA) to reverse long-standing opposition to gambling and accepting billions in new

²⁰ Deposition transcript R. Goodell, *NCAA v Christie*, UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY Civil Action No. 3: 12-cv-04947-MAS-LHG

²¹ *Murphy v. National Collegiate Athletic Association*, No. 16-476, 584 U.S. 453 (2018).

²² Roberts and Schiffer, “NBA views prediction markets as the same as sports betting.” FrontOfficeSports, February 14, 2026. <https://frontofficesports.com/adam-silver-nba-sees-prediction-markets-same-as-sports-betting/>

²³ Cambridge Dictionary (2026). <https://dictionary.cambridge.org/us/dictionary/english/integrity>

revenue by entering into previously unthinkable deals with the gambling industry which have led to their direct involvement in creating gambling products.

When it comes to the urgent need to protect people and families, the lack of the leagues' moral principles is only a small part of the integrity story. Far more dangerous is the lack of candor systematically, repeatedly, and intentionally demonstrated by the sports leagues and the NCAA regarding the scope of their relationships with the gambling industry. This has resulted in the sports leagues and NCAA becoming full partners in the gambling industry and unleashing an entirely different, inherently dangerous, and more highly addictive form of online gambling known as micro betting on the American public. Micro betting, and its close cousins, "prop bets" and "same game parlays" has enriched the leagues and the NCAA while simultaneously causing a new American mental health and addiction crisis. While the most at risk are teenagers and younger adults, the harm is quickly metastasizing across all demographics.

To borrow an unfortunate phrase, *the worst is yet to come*. In development, ready to launch, and financially backed by the NFL, is an even faster and more lethal form of AI-driven micro betting specifically designed to convert traditional fans into constant micro bettors.²⁴ Because the sports leagues, the NCAA, prediction markets, and the online gambling companies have not been honest with the public and policymakers; the development of this new and more dangerous form of online gambling is rolling out without any federal oversight. It is magnifying the mental health crisis and must be addressed forthwith at the federal level.

Thus, I shall devote much of my testimony to uncovering the truth regarding the dangerous and somewhat clandestine financial relationships between the gambling industry and the sports leagues, including the NCAA. Once Congress and the American people have a clear and accurate understanding of how the public is being targeted with a known addictive product which is designed, engineered, and delivered by the sports leagues in partnership with the gambling industry, there will be an immediate and powerful call for federal oversight, reform, and comprehensive regulation of the gambling industry and its sports and technology partners. We are in the early years of a new and fast-growing mental health crisis caused by the newest and least understood online sports gambling products. Lives and families are in the balance. The time is now for Congress to exercise its lawful authority by passing legislation to bring federal safety standards to the online sports gambling industry.

The Mental Health and Sports Integrity Crisis –

Let me be clear. I am not opposed to sports gambling. However, I am vehemently opposed to and deeply concerned about what has transpired in just eight years since the United States Supreme Court struck down the Professional and Amateur Sports Protection Act ("PASPA").²⁵

²⁴ Matt Fleckenstein, "One system. Endless solutions." Genius Sports Investor Day/ Genius IQ. <https://www.youtube.com/watch?v=L6ZWQImpYNw>

²⁵ *Murphy v. National Collegiate Athletic Association*. 138 S. Ct. 1461 (2018).

The sports gambling industry has expanded beyond a single industry to become the “gambling establishment” comprised of once unthinkable business partnerships including gambling companies; prediction markets, sports leagues, teams, owners, and athletes; the world’s largest media and technology companies; social media; the AI industry; and state governments themselves.²⁶ All are acting in concert to deliver online gambling at light speed and to ensure that access to sports gambling action never stops. This new and AI-fueled business model is resulting in increased gambling addiction and gambling-related harm.

Medical science has recognized for more than twelve (12) years that gambling is a known addictive product, and gambling disorder is an addiction similar in nature to heroin, opioids, tobacco, alcohol, and cocaine (DSM-5, 2013). With every other addictive product or substance, the federal government regulates the advertising, promotion, distribution, speed, and consumption of the product. This is to prevent harm and protect the public from danger when an industry is marketing and distributing an addictive and potentially dangerous product.

With gambling, the exact opposite is occurring. This is the core of our new sports integrity nightmare. The sports leagues have further embraced avarice by selling real-time data to the gambling industry to create high intensity gambling products of a kind we have never seen before. These data agreements enrich the leagues and serve as the blood and oxygen supply for instant and non-stop micro betting. The gambling industry and sports leagues have become partners to deliver constant and non-stop gambling action on every phone, tablet, and computer. Frighteningly, the gambling and prediction market companies, in concert with the sports leagues and AI companies, are poised to launch an even more destructive product with touch screen live micro betting. This will permit 24-hour nonstop gambling on every conceivable micro event by merely touching the screen of your phone, tablet, or use a mouse or remote on your computer or television. It will usher in a world of non-stop micro betting, at the speed of a slot machine, without ever leaving your bed.

With the use of cutting-edge technology, incredible computing power, artificial intelligence, and billion-dollar data partnerships, the gambling industry and sports leagues are poised to turn every electronic device into a 24/7 gambling machine in conscious disregard of the mental health and addiction epidemic that will surely follow. In the crosshairs of this impending epidemic are children and young adults being victimized by the unrelenting power of technology and the normalization of sports gambling. Without leaving our homes, each game, contest, or match from every corner of the globe will deliver constant access to highly addictive micro betting and non-stop gambling action. The human brain is not built to handle constant and unrelenting exposure to an addictive product. However, this is exactly what the

²⁶ Orford, J. (2017). *The Gambling Establishment and the Exercise of Power: A Commentary on Hancock and Smith*. *International Journal of Mental Health and Addiction*, 15(6), 1193-1196. <https://doi.org/10.1007/s11469-017-9781-8>.

gambling companies and sports leagues have developed and are prepared to launch on the American public.²⁷

The chasing of action and/or losses is a crucial part of the diagnostic criteria for gambling addiction.²⁸ From my own clinical experience, I have found that chasing action is also the symptom most closely related to suffering harm. Chasing action is something I see every day I meet with clients and families suffering the most dire and devastating effects of gambling and gambling addiction. The effects I see every day in my clinical work as a therapist include financial ruin, desperation, suicidal ideation, depression, anxiety, career loss, divorce/separation, criminal behavior, homelessness, cooccurring alcohol and substance disorders, and deep despair. With online sports gambling, delivering constant action for users to chase is an inherent part of the gambling industry and sports leagues' business model. It is exactly what online sports gambling is designed to deliver, and it is, tragically, ruining the lives of many people and countless families.

Inducing younger and more vulnerable people to become addicted to gambling has become part of the gambling and sports industry business model. The leading AI company in this space is Genius Sports. One of the largest equity shareholders in Genius is the National Football League and its 32 team owners. In partnership with the NFL, Genius Sports has developed *BetVision*; an interactive touchscreen betting platform installed in streaming services. The stated purpose of *BetVision* is to deliver a seamless real-time non-stop micro betting platform where merely touching the screen will permit gambling on the actions of every player. *BetVision* tracks the tendencies of each individual gambler and provides overwhelming personal data to the gambling companies for the stated purpose of targeting people with individually crafted gambling products and promotions.²⁹

The NFL and Genius Sports describe the goal of *BetVision* as *an immersive intelligent interactive tool to convert traditional fans into high engagement in-play bettors...which are significantly more profitable for Genius and for our sportsbook partners.*³⁰ The dangerous and intentional lack of candor does not stop with the NFL investing in *BetVision*. Under the guidance of Commissioner Goodell, the NFL recently sold all of its streaming content services to Disney. In exchange, the NFL received a 10% ownership of ESPN.³¹ The strategy underlying this new partnership with Disney/ESPN is to deliver sports gambling featuring

²⁷ Nick Watt, "How the NFL is betting big on gambling." CNN's The Lead with Jack Tapper, March 29, 2026. <https://www.cnn.com/2026/03/19/business/video/gambling-sports-betting-nfl-genius-lead-jake-tapper>

²⁸ Rennert, L., Denis, C., Peer, K., Lynch, K. G., Gelernter, J., & Kranzler, H. R. (2014). *DSM-5 gambling disorder: Prevalence and characteristics in a substance use disorder sample*. *Experimental and Clinical Psychopharmacology*, 22(1), 50–56. <https://doi.org/10.1037/a0034518>.

²⁹ Matt Fleckenstein, "FIVE insights from our CPO: Why *BetVision* is the future of in-play." Genius Sports, September 8, 2025. The SPO stated: "By leveraging user behaviour and a smart understanding of the live match state, *BetVision* populates relevant betting markets and statistics to help users decide on their next bet and track the progress of ongoing ones." <https://www.geniussports.com/content-hub/betvision-future-of-live-betting/>

³⁰See *supra* note 24.

³¹ The Walt Disney Company, "ESPN to Acquire NFL Network and Other Media Assets from the NFL in Exchange for a 10% Equity Stake in ESPN." August 5, 2025. <https://thewaltdisneycompany.com/news/espn-nfl-agreement/>

BetVision through streaming services such as ESPN Plus. Thus, the NFL and Genius Sports have developed the technology to seamlessly deliver non-stop micro betting and prediction markets with the aim of converting even casual fans into constant in-game gamblers.

The notion that our sports leagues and the gambling industry are openly seeking to convert fans into high engagement micro bettors is alarming. On its face, it resembles the villainous plot of a movie. But this is really happening right now: The design and delivery of a dangerous and addictive product for the purpose of wildly enriching a powerful syndicate while knowingly inflicting untoward harm on society.

The inclusion of prediction markets in the gambling industry syndicate takes the risk of an addiction epidemic to ever more destructive levels. Prediction markets, by labeling their sports gambling product as “investment products” are presently seeking to act in total disregard of state laws governing gambling. This means that gambling consumer protection laws enacted by states to protect the public are disregarded by the prediction markets.

This rejection of state consumer protections and the concurrent expansion of prediction market gambling to teenagers and adults in all fifty states represents a significant expansion by the sports leagues into the gambling industry. In October 2025, the National Hockey League (NHL) struck a massive deal with Kalshi and Polymarket to sell real time and historical data to fuel the advancement of micro betting, parlays, and same-game parlays on prediction market platforms.³² The NHL is not alone in striking prediction market data deals. In March 2026, Major League Baseball signed an “exclusive data deal” with offshore prediction market gambling company Polymarket.³³ Additional sports gambling data deals with prediction market companies have been signed by Major League Soccer, and the Ultimate Fighting Championship (UFC).³⁴ The National Basketball Association (NBA) is in the final stage of talks to sell its data to the prediction market industry.³⁵ The NFL claims a neutral position on prediction markets data deals. Meanwhile the league financially benefits from prediction markets because of its ownership stake in Genius Sports; a company aggressively engaged with prediction market companies as business clients.³⁶ These complex

³² Bill King, “How the NHL got comfortable with prediction markets.” Sports Business Journal, October 27, 2025. <https://www.sportsbusinessjournal.com/Articles/2025/10/27/how-the-nhl-got-comfortable-with-prediction-markets/>

³³ Ben Horney, “MLB makes multiyear prediction-market deal with Polymarket.” March 19, 2026. <https://frontofficesports.com/mlb-makes-multiyear-prediction-markets-deal-with-polymarket/>

³⁴ Id.

³⁵ Ben Horney, “NBA is in talks with Kalshi and Polymarket.” Front Office Sports, April 16, 2026. <https://frontofficesports.com/nba-is-in-talks-with-kalshi-and-polymarket/>

³⁶ Jack Davidson, “Betting Overview & Prediction Markets Update.” Genius Sports, January 2026. https://www.youtube.com/watch?v=OXFP_bTNdFA; Genius Sports Investor Day “Panel Discussion with Mark Lockem Roger Godell, and Steve Bornstein.” January, 2026. https://www.youtube.com/watch?v=AP3gJ0_UWcw

and lucrative data deals have now resulted in the introduction of Polymarket “bonus bet” offers for sports gambling including MLB and the NBA.³⁷

The expansion of prediction market gambling to include financial partnerships with the most powerful sports leagues has dramatically increased the risk of addiction specifically with young men. Prediction markets are structured in ways that encourage continuous, and potentially addictive, engagement. While presented as a financial exchange in which users “trade” on future events, the prediction market design actively encourages patterns of use associated with gambling addiction. Most notably, they include features that reinforce repeated use through rapid feedback and constant stimulation. As one commentator explains “the platforms demonstrate sophisticated understanding of sensation-seeking behavior in their design. For instance, real-time price movements, instant feedback mechanisms, and celebration pop-ups create a constant stream of novel stimuli that can trigger dopamine responses.”³⁸

The prediction market then packages this action as a form of investment rather than gambling to circumvent state regulatory requirements for gambling operators. This is intended not only to avoid state regulation, but also to attract an ever more vulnerable group of gamblers to participate in the action. States historically set twenty-one as the minimum legal age for gambling. The prediction markets ignore this public safety law and openly tout their gambling product as available to anyone eighteen or older.

Next, states with legalized sports gambling will typically mandate self-exclusion programs as part of the package of consumer protection laws. The prediction markets turn a blind eye to self-exclusion programs and readily welcome all takers, including those battling to overcome gambling addiction. The labeling of prediction markets as an investment rather than gambling is another predatory tactic designed to attract the most vulnerable users to these platforms. It is not difficult to imagine how people struggling with a gambling problem would be drawn to prediction markets under the false premise that they are not gambling but merely investing. Ignoring the basic form of safety enhancement by pretending that prediction markets are not gambling is not only self-serving, but vile and predatory. Yet it is being openly encouraged by prediction market operators.

Only forty states have legalized sports gambling. For a variety of reasons, the people in the other ten states have chosen to reject sports gambling. However, the prediction markets, including Kalshi, Polymarket, DraftKings, FanDuel, and Fanatics disregard the will of the people in these ten states and are delivering sports gambling in open defiance of the law and the public good. We are literally witnessing this segment of the gambling industry acting as though it is entirely above the law. This defiance of the law extends to taxation. The prediction markets have unilaterally decided that state laws do not apply to their gambling products.

³⁷ Michael O’Nair, “Polymarket Promo Code STREET: Get upgraded \$50 bonus for MLB, PGA, NBA playoffs.” Russell Street Report, May 14, 2026. <https://russellstreetreport.com/2026/05/14/sports-betting/polymarket-promo-code-street-get-upgraded-50-bonus-for-mlb-pga-nba-playoffs/>

³⁸ Sharon Rabinovitz & Nizan G. Packin, All Bets Are On: Addiction, Prediction, Regulation, and the Future of Financial Gambling, 36 Fordham Intellectual Prop., Media, Entm’t L. J. 147 (2025).

Thus, in addition to rejecting state consumer protection regulations, these companies refuse to pay state taxes on the enormous profits they generated by prediction market gambling. Yet, the economic and mental health consequences and costs are experienced in the states.

This brings us back to the crucial issue of integrity of the sports leagues. This is not an issue of whether the public can trust the outcome of any particular game. The moment the leagues decided to embrace and accept gambling money, they inexorably called into question the sanctity of their sports and the joy of athletic competition. This was a conscious and deliberate decision on the part of the leagues: to forsake their historical value to society for the ability to extract more money from their fans' bank accounts to their bottom lines. What the leagues presently attempt to casually portray as "fan engagement" is a calculated effort to chase the revenue offered by data deals with gambling and prediction market operators. Sports once belonged to the American public. Sports has, for centuries, belonged to American families and shared by grandparents, parents, children, and sibling. Those days are gone. Sports have sold their soul to the gambling industry by choosing to become the equivalent of a non-stop slot machine.

Thus, whether the American public can still trust and value the truth, morality, and wholesomeness of athletic competition is a decision each of us will make for ourselves. Such is the bed the sports leagues have created. Claims that the leagues are poised to police themselves are not sufficient.

As for the self-serving claim that the leagues must sell their data to gambling operators in order to ensure self-surveillance and protect the integrity of the game, this is beyond insulting to the public and our elected leaders. One need look no further than the plethora of professional and collegiate scandals over the last 18 months to see the overwhelming evidence that the new world order of in-game micro betting has resulted in far too many compromised moments. Companies such as IC-360 (a presenter during this hearing) will proclaim that it monitors each game and contest for signs of irregularity with betting patterns. Considering the still mounting number of alleged cheating scandals in the past year that it failed to prevent, with all due respect, this is not the answer.

What must be acknowledged are the American lives put at risk by these alleged cheating scandals. It should be noted that each of the people accused are innocent until proven guilty. Thus far, every cheating scandal involves micro betting, and this is not surprising. Micro betting is an entirely new and inherently dangerous gambling product which permits action every 10 seconds or faster. The opportunities for gambling to taint and tarnish sports have grown to countless numbers and many of the scandals involve student athletes under the age of twenty-one. The leagues and the NCAA have created this problem. The people getting caught in the trap are increasingly younger and often student-athletes. The leagues and the NCAA designed this model in partnership with the gambling industry. For the leagues to now claim they need to protect their image is disingenuous and problematic.

It bears noting that the NCAA is complicit and equally lacking integrity when it comes to truth and candor. Previously, the Commissioner of the NCAA, Governor Charlie Baker came before the Senate Judiciary Committee purporting to request help reining in proposition bets

on college sports.³⁹ However, at the very same time, and unannounced to the Judiciary Committee, the NCAA was involved in negotiations with Genius Sports to sell college sports data to gambling operators to further fuel micro betting. On April 25, 2025, the NCAA, quietly, with a late Friday press release, announced a lucrative data deal with Genius Sports.⁴⁰ This somewhat unthinkable gambling partnership was met with condemnation⁴¹. However, without notifying Congress, or any other governing body, the NCAA and its gambling partners now accept wagers on each shot in our beloved *March Madness* basketball tournaments.

Descriptions of the hypocritical complicity of the leagues could continue with little end in sight. The height of hypocrisy was demonstrated by major league baseball in the wake of the 2025 micro betting scandal regarding two Cleveland Guardian pitchers. As the Committee will recall, two Guardian pitchers stand accused of fixing pitches to enable partners to profit from micro bets on the speed and accuracy of each pitch.⁴² In the immediate aftermath of these allegations, MLB acted quickly; not to protect the public but to guard its lucrative data deals with the gambling industry. MLB Commissioner Rob Manfred announced a \$200.00 per pitch limit on such wagers. A review of this decision by Commissioner Manfred reveals its true intent is to protect the value of MLB's relationship with the gambling industry.

Consider, for example; there are approximately 20 pitches each half inning, or 40 per inning and 360 each game. With fifteen games most nights, people can now wager and lose *only \$72,0000 a game and \$1,080,000.00* per night all season on micro betting on each pitch. Yes, MLB acted swiftly. Not to protect the integrity of the game, however, but to guard its lucrative data deals with the gambling industry.

The Call for Federal Regulation –

On May 24, 2018, the United States Supreme Court struck down the Professional and Amateur Sports Protection Act (PASPA). This cleared the way for states to legalize online sports gambling. In just eight years, thirty-nine states and the District of Columbia have done so.

Of critical importance, The *Murphy* Court specifically noted that Congress retains the legal authority to regulate online sports gambling:

³⁹ Becky Sullivan, "The president of the NCAA calls for a ban on 'prop bets' in college sports ." NPR, December 17, 2024. <https://www.npr.org/2024/12/17/nx-s1-5231991/ncaa-charlie-baker-sports-gambling-regulations-senate>

⁴⁰ Genius Sports, "NCAA and Genius Sports expand partnership through 2032." April 25, 2025. <https://www.geniussports.com/newsroom/ncaa-and-genius-sports-expand-partnership-through-2032/>

⁴¹ . Public Health Advocacy Institute, "Public Health Advocacy Institute response to NCAA decision to sell gambling data to sportsbooks." April 28, 2025. <https://www.prnewswire.com/news-releases/public-health-advocacy-institute-response-to-ncaa-decision-to-sell-gambling-data-to-sportsbooks-302440104.html>

⁴² U.S. Attorney's Office EDNY, "Two current major league baseball players charged in sports betting and money laundering conspiracy." November 9, 2025. <https://www.justice.gov/usao-edny/pr/two-current-major-league-baseball-players-charged-sports-betting-and-money-laundering>

The legalization of sports gambling is a controversial subject. Supporters argue that legalization will produce revenue for the States and critically weaken illegal sports betting operations, which are often run by organized crime. Opponents contend that legalizing sports gambling will hook the young on gambling, encourage people of modest means to squander their savings and earnings, and corrupt professional and college sports. **The legalization of sports gambling requires an important policy choice, but the choice is not ours to make. Congress can regulate sports gambling directly, but if it elects not to do so, each State is free to act on its own** (*Murphy v NCAA*, 2018) (emphasis added).

In aggressively marketing and promoting sports gambling through broadcast advertising, internet ads, social media, in-app notifications, and steering viewers toward certain gambling products during the broadcast of games, our relationship with sports has shifted to a relationship with gambling. Equally dangerous is the gambling industry use of “VIP hosts” where the gambling companies target and reward people for increasing their gambling action. VIP hosts use a wide array of incentives and induce people to keep gambling. These often include tickets, gifts, trips, cash bonuses, restaurant meals and more. This is akin to a drug dealer rewarding the best “customers” to make certain they never stop needing or wanting action. VIP hosts presently operate without any federal scrutiny, and this gambling industry tactic warrants its own Senate hearing.

The gambling industry and its sports partners have taken sports away from children, families, and the American public. Gambling takes place on every micro-event within sporting events, from the speed of the next baseball pitch to every football snap, basketball shot, tennis serve, and even ping pong points from Russia and Eastern Europe. Live sports for gambling happen around the globe and around the clock so that the action never stops. Sports have sadly become the equivalent of a non-stop slot machine.

How did we get here and why is it essential that Congress act to regulate gambling, including prediction markets, as an issue of public health?

There are two answers to this question.

First, online sports gambling is a fundamentally different and more dangerous gambling product than anyone could have anticipated. In May 2018, when the Supreme Court decided *Murphy v NCAA*, no one could have foreseen what online sports gambling would quickly become.

On June 14, 2018, Governor Phil Murphy made the first post-*Murphy* bet. He placed \$20 on the New Jersey Devils to win the 2019 Stanley Cup. This was a bet that would take 11 months to decide.

Now, just eight years later, online sports gambling brings action every 11 seconds, or faster. With the use of AI, online sports gambling takes place at light speed, and this goes on nearly 24 hours a day, every day. The human brain is not built to handle such stimulation from the

rapid consumption of a known addictive product. This is particularly problematic with younger adults as the risk/reward system of the brain is not fully developed until age 26.⁴³

Fast approaching is the pending rollout of BetVision and the NFL investment in Disney and ESPN resulting in the likely launch of a non-stop micro betting streaming service⁴⁴This is more like a dystopian science fiction story than recreational sports gambling. It certainly was not what the Majority in *Murphy* or anyone had in mind when the case was decided on Tenth Amendment principles.

The second answer to how we arrived at this dangerous juncture with online sports gambling is the old adage, *follow the money*.

The sports leagues, teams, owners, and players have entered into previously unthinkable partnerships with the gambling industry. They sell their real-time data statistics to the gambling industry for billions of dollars. This takes place with every sport from baseball, football, and basketball to soccer, tennis, golf, hockey, auto racing and more.

The gambling companies, now including prediction markets, then turn these statistics into constant gambling action. Micro bets, same game parlays, player props, profit boosts, rapidly changing in-game odds and point spreads, and much more. These are AI-driven gambling products which target people with the most addictive forms of gambling action. Meanwhile, the gambling industry admonishes the public to “bet responsibly” and calls this industry driven hypocritical approach, the “responsible gaming” (RG) model.

Follow the money. The gambling industry is paying its sports and media partners billions of dollars to obtain statistics, advertise, create, and distribute online gambling products. Unlike any other business in this country, no tangible products are sold or distributed. The gambling industry is not selling any widgets on the market. The only way for the gambling industry to recoup its massive spending and generate revenue is to induce the public to chase faster and faster gambling action and lose more money more quickly than ever before. There is no dispute that keeping people in action is, fundamentally, the gambling industry business model.

Chasing action is also the clearest symptom of gambling addiction and gambling-related harm. Thus, the industry’s business model is designed to cause harm by prompting the public to engage in constant action with ever more risky gambling activities.

Meanwhile, the gambling industry contends that less than one percent of gamblers are suffering from a gambling addiction and less than five percent are at-risk for problem gambling. In fact, The President of the American Gaming Association (“AGA”) told CBS’ 60-Minutes in 2024 that the gambling industry rejects the notion that online gambling is addictive:

⁴³ Arain M, Haque M, Johal L, Mathur P, Nel W, Rais A, Sandhu R, Sharma S. *Maturation of the adolescent brain*. *Neuropsychiatr Dis Treat*. 2013;9:449-61. doi: 10.2147/NDT.S39776. Epub 2013 Apr 3. PMID: 23579318; PMCID: PMC3621648.

⁴⁴ See *supra* note 31.

*“ . . . I don't believe that there is an addiction to mobile betting any more than there is an addiction to utilization of your phone for any other reason,”*⁴⁵

Notwithstanding the reticence of the AGA to recognize the science related to gambling addiction, there is a burgeoning international movement to consider the unprecedented expansion of the online sports gambling industry as a significant threat to mental health. The evidence is everywhere that we are in the early stages of a mental health and gambling addiction epidemic and those most severely impacted are young men. This brings the focus squarely to the dangerous conduct of the prediction markets and a business model that attempts to deliver non-stop gambling to people as young as eighteen.

A March 2026 national survey found that nearly two-thirds (65 percent) of American adults report having gambled before the age of 21.10 Online gambling particularly afflicts young men, as a Fairleigh Dickinson University study found that 25 percent of men aged 30 and under wager on sports digitally, and that 10 percent admit to a gambling problem. These are not just statistics. These are young people whose relationships with their friends, families, and communities have been disrupted by their engagement with these platforms.⁴⁶

A high percentage of calls to gambling helplines are coming from younger adults fixated on the fast-paced action of in-game micro sports betting. As recently stated by Felicia Grondin, the executive director of the Council On Compulsive Gambling of New Jersey, “People don’t really have the time to collect their thoughts to say, ‘Do I really need to place this wager?’ They get involved in the game. There’s a dopamine rush, they’re excited and before you know it, they’re tens of thousands of dollars in debt . . .”⁴⁷

The gambling industry itself is strongly opposed to the federal government regulating gambling. The official position of the American Gaming Association is “The AGA firmly believes additional federal regulatory oversight of legal sports betting is unwarranted. States and tribal nations have proven to be effective regulators of gaming—including sports betting—and the more than 4,000 regulators nationwide have decades of experience overseeing gaming operations within their jurisdictions.”⁴⁸ The recently created Sports Betting Alliance (SBA) comprised of Bet365, BetMGM, DraftKings, Fanatics, and FanDuel also strongly opposes any form of regulation of micro betting.⁴⁹

⁴⁵ Wortheim et al., “Young gamblers place sports bets while showering, wager away student loan money, addiction therapist warns.” CBS News, February 4, 2024. <https://www.cbsnews.com/news/young-gamblers-sports-betting-addiction-60-minutes/>

⁴⁶ Fairleigh Dickinson University, “FDU Poll finds Online Betting Leads to Problems for Young Men,” September 19, 2024, <https://www.fdu.edu/news/fdu-poll-finds-online-betting-leads-to-problems-for-young-men/>.

⁴⁷ Bobby Brier, “Surge in problem gambling in NJ — and in calls for help.” New Jersey Education Association, September 26, 2024. <https://www.njspotlightnews.org/2024/09/problem-gambling-surges-in-new-jersey-more-young-men-call-helpline-sports-betting/>

⁴⁸ William C. Miller, Jr., Memo to Members of the 117th United States Congress Dated January 28, 2021. <https://www.americangaming.org/wp-content/uploads/2021/01/Letter-to-the-Hill-Jan-2021.pdf>

⁴⁹ Robert Linnehan, “New Jersey lawmakers, regulators consider micro betting ban bill.” SportsBettingDime News, December 16, 2025. <https://sportsbettingalliance.org/>

The AGA and SBA contend, without empirical evidence or data, that gambling addiction and gambling-related harm are *de minimis* problems in society. The industry publicly states that only 1% of the US gambling population shows addictive behavior regarding the wagers they place.⁵⁰ This frames the gambling industry’s position that any mental health or financial struggles with gambling should be focused on the shortcomings of their customers and not the addictive nature or predatory marketing of their gambling products. Thus, the gambling industry continues to follow the same “blame the customer” playbook perfected by Big Tobacco and seeks to place the onus on individual users by advancing an industry-driven responsible gaming policy. This is intentionally and unethically intended to distract and mislead the federal government to discourage it from regulating online sports gambling to help make gambling products safer for consumers.

The Responsible Gaming Model is Fatally Flawed -

Historically, gambling disorder was treated as a problem of individual responsibility with emphasis placed on people already suffering from gambling-related harm. This model is supported by the gambling industry and is designed to focus on treating individuals diagnosed with gambling disorder while urging the public to exercise personal responsibility when gambling. At the core of this approach has been the gambling industry-sponsored narrative that harm is suffered by only a small percentage of “problem gamblers” and they should receive treatment funded by gambling industry revenue. This is the model used in every state that has introduced online gambling. It is the moral equivalent of permitting Big Tobacco free reign to do whatever it wants so long as it pays for chemotherapy and hospice.

This gambling industry-driven perspective is often called the “responsible gaming” (“RG”) model and rejects the concept that online sports gambling causes societal harm. The gambling industry wrongly contends that online sports gambling causes no net societal harm, and there is no need for a public health approach focused on preventing harm. Policy makers are then urged to eschew the notion that public harm must be prevented by regulating the distribution and marketing of gambling products. This again draws parallels to tobacco where for decades the industry denied that tobacco and nicotine are addictive and cause disease while simultaneously seeking to avoid any public health regulation.

The RG model advanced by the industry is based on an incorrect theory that only a small percentage of people are suffering harm from gambling and gambling addiction, and a tiny fraction of gambling revenue would be sufficient to pay for treatment of those who suffer harm. The RG approach to industry self-regulation has come under increased criticism for lacking empirical evidence. It is also roundly criticized for minimizing the scope of public harm by focusing only on people struggling with gambling addiction and failing to consider the pain, damage and harm inflicted on impacted others including family and friends of the persons suffering with gambling addiction.

⁵⁰ Devin O’Connor, “American Gaming Association: 90 percent of casino gamblers play responsibly.” Casino.org, February 14, 2019. <https://www.casino.org/news/american-gaming-association-90-percent-of-gamblers-play-responsibly/>

Further, the RG approach is ethically flawed because it was paid for and created by the gambling industry with the specific purpose of avoiding government regulation.⁵¹ With every other disease and condition the overwhelming emphasis is placed on prevention. With gambling addiction, the industry invokes the RG model and rejects calls for federal regulation designed to prevent harm by claiming that the gambling industry should be permitted to police and regulate itself.

The time has come for the federal government to reject the abject failure of the industry-driven RG approach and endorse an effort to meaningfully regulate the online sports gambling industry as an urgent public health concern. One would like to think that the gambling industry and its establishment business partners would welcome efforts by the federal government to design and implement rules and regulations to protect the betting public across the board in a way that provides an even playing field. However, the mere mention of federal regulation causes a strong reaction in opposition from the industry. This fact alone is, to borrow a gambling term, a “tell” and suggests the need for Congress to become more actively involved.

The Time to Act is Now –

Notwithstanding efforts by the gambling industry to protect its financial stranglehold and avoid federal regulation, the words of the *Murphy* Court endorsing the right of Congress to regulate online sports gambling serve as a call for the federal government to embrace the legal, ethical, and moral obligation to prioritize the mental health of Americans over gambling industry revenue (which is comprised solely from the public’s losses). It is the duty of Congress and the federal government to act and protect the mental health of all Americans because the evidence of a looming crisis is undeniable.

The first waves of independent research examining the societal damage related to online sports gambling in the United States are just becoming available. In May 2023, the National Collegiate Athletic Association (“NCAA”) released an alarming study examining online sports gambling on college campuses.⁵² The disturbing findings include:

- Sports wagering is pervasive among college students with 58% of 18 – 22-year-olds engaging in sports gambling.
- Sports Gambling is widespread on college campuses with 67% of students betting on sports. Students living on or near campus gamble at higher frequencies.
- Nearly 60% of students are likely to bet on sports after seeing a gambling advertisement.

⁵¹ Hancock, L., Smith, G. Replacing the Reno Model with a Robust Public Health Approach to “Responsible Gambling”: Hancock and Smith’s Response to Commentaries on Our Original Reno Model Critique. *Int J Ment Health Addiction* 15, 1209–1220 (2017). <https://doi.org/10.1007/s11469-017-9836-x>.

⁵² Key Findings from the NCAA Sports Betting Activities Survey, April; 2023 are available at: https://ncaaorg.s3.amazonaws.com/research/wagering/Apr2023NCAA_WageringKeyFindings.pdf

- More than 60% of students engaged in gambling are betting on sports using the highly addictive “in game/micro bets”.
- Nearly 80% indicate that betting on sports makes it more likely they will watch the event on television or streaming.
- 60% of student gamblers believe they can and will make money betting on sports.

There were also two important online gambling studies released in July 2024. The first is from researchers at UCLA Anderson School of Management and the University of Southern California and the other is from researchers at Northwestern University.^{53 54}

The UCLA/USC and Northwestern are separate and independent studies but reveal strikingly similar and alarming findings particularly in financially vulnerable communities and this includes a nearly 30% increase in bankruptcy filings in states with online sports gambling. The UCLA/USC researchers concluded:

The legalization of sports gambling decreased consumer financial health. These results seem to be particularly pronounced when states legalize online betting, suggesting that the ease of access to gambling increases the problems associated with it. Moreover, we find that young men, particularly those in low-income counties, are most affected.

It must also be recognized that gambling addiction and gambling-related harm causes damages far in excess of mere financial losses. There is a direct causal connection between gambling addiction and societal harms which include:⁵⁵

- Anxiety, Depression, Isolation
- Loss of Job/Career
- Cooccurring alcohol and drug disorders
- Family violence
- Homelessness
- Criminality
- Psychological distress
- Comorbidities with substance misuse
- Suicide

⁵³ Hollenbeck, B., Larsen, P., & Proserpio, D. (2024). The financial consequences of legalized sports gambling. *Available at SSRN*.

⁵⁴ Baker, S. R., Balthrop, J., Johnson, M. J., Kotter, J. D., & Pisciotta, K. (2024). *Gambling away stability: Sports betting's impact on vulnerable households* (No. w33108). National Bureau of Economic Research.

⁵⁵ Wardle, H., Degenhardt, L., Marionneau, V., Reith, G., Livingstone, C., Sparrow, M., ... & Saxena, S. (2024). The lancet public health commission on gambling. *The Lancet Public Health*, 9(11), e950-e994.

Federal regulation will expose and replace the dangerously flawed RG system of industry self-regulation with a set of policies that will help to prevent most harm from happening in the first place. RG places the onus on the individual rather than regulating the addictive nature of online sports gambling and predatory conduct of the industry. This failure of the RG model must be replaced with a comprehensive response at the federal level, and, obviously, this must begin with Congressional action. This hearing is another significant step forward toward Congress enacting meaningful safety standard to address and prevent the mental health crisis related to gambling addiction.

Personal and Professional Background -

I hold a master's degree in professional clinical counseling from La Salle University, a doctorate in Law and Public Policy from Northeastern University, and a juris doctorate from Temple University School of Law. My doctorate research focuses on policies required to prevent gambling addiction and gambling-related harm

Professionally, I serve dual roles as Director of Gambling Policy with the Public Health Advocacy Institute (PHAI) at Northeastern University School of Law and as an internationally certified gambling addiction counselor. This permits me to clinically treat patients and families suffering with gambling addiction while simultaneously working as a policy expert and advocate. Simply put, prevention of gambling addiction is the single best form of treatment.

Given my background and qualifications, I am duty bound to utilize the totality of my professional training and personal experience to help lead the movement for regulation and reform with the goal of preventing gambling addiction and gambling-related harm.

In addition to being a gambling addiction therapist and Director of Gambling Policy with PHAI, I am also a gambling addict in recovery. I made my last bet on April 27, 2014, and on that same night, I nearly took my own life in a suicide attempt. With gambling addiction, the risk of suicide is omnipresent. Research shows that one in every two people suffering with gambling addiction will contemplate suicide and one in five will make an attempt.⁵⁶

In the grips of my gambling addiction, I devastatingly hurt many people who had loved and trusted me. This included clients, friends, my children, and the people who were closest to me. Personal carnage related to gambling addiction destroys the most trusted and intimate relationships, sometimes beyond repair.

Gambling addiction took my mind, soul, body, and conscience. It left me broken, battered, and homeless. I was unrecognizable to myself. The only thing I had left was my name.

⁵⁶ Wardle, H., Reith, G., Langham, E., & Rogers, R. D. (2019). Gambling and public health: we need policy action to prevent harm. *British Medical Journal*, 365.

On February 15, 2015, I stood in a courtroom in Philadelphia, Pennsylvania. This was a court where I practiced law for more than two decades and where my father had practiced for more than half a century. In the presence of the court, the clients I had betrayed, and my children, I pled guilty to financial crimes committed in the throes of my gambling addiction. On that day, I pledged, under oath to the court, that if I could get well and find recovery, I would give back by doing everything in my power to prevent others from suffering harm related to gambling addiction. I continue this mission by serving as Director of Gambling Policy with PHAI and as a therapist working with people and families battling to overcome gambling addiction.

As a therapist, I adhere to the ethical principle of beneficence. As such, it is my duty to advocate in the best interests of my patients, their families, and for the good of society. It is in this realm that I fight for regulation designed to prevent gambling addiction and gambling-related harm. Prevention is the best form of treatment. Our Congress can lead the movement to protect families and prevent this mental health and gambling addiction epidemic.

Thank you for granting me the opportunity to address this distinguished Committee. I hope this is just the beginning of a more comprehensive and ongoing dialogue.

Respectfully,

A handwritten signature in cursive script that reads "Harry Levant". The signature is written in black ink and is positioned above a solid horizontal line. To the right of the signature, there is a vertical dashed line extending upwards from the top of the signature.

Dr. Harry Levant, MA, PCC, ICGC-I
Director of Gambling Policy
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