

MEMORANDUM

To: Harmonization Initiative Meeting Log
From: Harmonization Initiative Staff
Re: Meeting with Representatives of Integrity Compliance 360 Inc.

On March 26, 2026, Harmonization Initiative Staff met with representatives from Integrity Compliance 360 Inc.

The topic discussed was how to approach SEC-CFTC harmonization efforts. Integrity Compliance 360 Inc. representatives provided the attached documents, which were discussed during the meeting.



Date : March 13th, 2026

To :

U.S. Securities and Exchange Commission:

RE: SEC-CFTC Harmonization Initiative - Refined Meeting Agenda with Integrity Compliance 360 (IC360)

Dear Chairman Atkins and Chairman Selig:

Please see the proposed agenda items below as requested.

IC360 Proposed Attendees:

- Scott Sadin, Co-CEO, IC360
- Ali Schempp, Chief Commercial Officer, IC360
- Quinn Mitchell, Vice President of Product, IC360

Harmonization Meeting Agenda with IC360: Sixty (60) Minutes

Agenda Item #1: Overview of IC360

Introduction of IC360's role as the premier provider of integrity services and regulatory compliance technologies across the major sports leagues, collegiate institutions, traditional sportsbooks, and prediction markets internationally.

Agenda Item #2: IC360 Technology Demonstrations: 3 Pillars of Integrity

IC360 will share and provide comprehensive technology demos of its three-pillar approach to protecting market integrity and transparency, which DCMs and FCMs have integrated into their trading platforms.

- **Pillar 1: Market Surveillance and Alerting Engine Dashboard**
 - Real-time anomaly detection and global alerting system
- **Pillar 2: Prohibited Trading Solution (ProhiTrade)**
 - Identification of prohibited traders attempting to transact on markets in which they have undue influence on the outcome or possess access to material non-public information
- **Pillar 3: Responsible Trading & Self-Exclusion Hub**
 - Centralized hub for consumers to self-exclude from potentially harmful trading behaviors across prediction markets and other platforms

**Please see the attached materials*

Agenda Item #3: Strategic Discussion and Regulatory Support

- Offer IC360's support, assistance, and technological expertise to the SEC and CFTC in their collaboration efforts to strengthen the regulatory framework of U.S. financial markets as industry experts in providing white-label, integrity monitoring and insider trading detection technology.

Sincerely,

Ali Schempp

Chief Commercial Officer, IC360



Prediction Market & Event Contract Integrity

IC360's Three Compliance Pillars

IC360's regulatory technology and compliance platform was designed to assist prediction markets and exchanges in fostering a fair, responsible, and integrity-focused ecosystem via three core pillars. Each pillar has a data- and tech-driven product that can be delivered via frictionless integration into your existing tech stack.

Pillar #1:

Prohibited Trading Identification

Sports markets are subject to potential influence, manipulation, and/or spot fixing. Patrons who have the potential for undue influence must be blocked from transacting in applicable markets.

Product Detail:

ProhiTrade is a proprietary solution designed to manage integrity risks posed by stakeholders with access to sensitive information.

- **Prohibited List:** The system connects to sports properties to provide a centralized list of individuals (e.g., athletes, coaches) prohibited from trading on certain events.
- **Security:** Data protection is ensured using advanced cryptographic hashing and end-to-end encryption.

Pillar #2:

Market Surveillance

External threats pose ongoing risks to the integrity of prediction markets. Proactive detection of suspicious traders and subsequent activity is critical for transparency and industry maturation.

Product Detail:

Access to IC360's robust and real-time alerting engine, which provides insight and visibility to anomalous and potentially nefarious activity throughout global sports markets.



Pillar #3:

Responsible Trading & Self-Exclusion

Traders and patrons must be afforded prompt, customizable, and broad exclusion from trading activities should they deem their activity to be harmful or problematic.

Product Detail:

IC360 uses a comprehensive, client-controlled framework to ensure responsible trading and prevent potential problem use.

- **Centralized Self-Exclusion:** Users can immediately and fully self-exclude from specific or all market offerings across all partners.
- **Broad Coverage:** Exclusion extends beyond prediction markets (e.g., to sports betting), preventing users from simply shifting problem behavior.