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North Dakota Senate Judiciary Committee

Testimony of Lindsay Slader, SVP Compliance, GeoComply

Chairwoman Larson, and members of the Committee, thank you for the opportunity to testify today. My name is Lindsay Slader, and I am the Sr. Vice President of Compliance for GeoComply.

GeoComply is a global leader in geolocation, identity verification, and anti-fraud technology. The company supports regulated online sports betting, casino, poker, iLottery, advanced deposit horse wagering, and daily fantasy sports operators in 48 US states.

We hold nearly 40 jurisdictional licenses in the U.S. and both government and independent testing laboratories validate our software. Each day, we process upwards of 40 million geolocation transactions.

GeoComply was founded for the purpose of delivering a geolocation system to support the US internet gaming market. However, over the years, we have become a one-stop shop for various compliance needs for tightly regulated industries. Along with our leading geolocation security tools, we work with companies to address the needs of “know your customer” compliance through our ID Comply services. This dynamic age and identity verification system and our advanced geolocation and fraud detection technologies deliver unparalleled oversight for operators and regulators.

From the company’s inception, we recognized the challenge facing US Intra-State iGaming and the need for high-caliber technology to act as the legal enabler and safety net. Our technology enables online operators and regulators to meet the demands of federal law such as the Wire Act, Unlawful Internet Gambling Enforcement Act (UIGEA), and the sovereignty of states that choose to opt-in or out of online wagering.

Members of this committee may be familiar with location data sources such as GPS, wifi, and cell towers. This data is used to power many useful consumer applications that rely on geolocation such as Google Maps, Uber and placing a coffee order at the closest Starbucks. However, the main difference between these open-door tools and compliance-grade geolocation -- required for regulated internet betting -- is the way in which we interrogate that location data to ensure it is trusted and secure.

We cannot simply rely on IP data to determine a player’s location. We dig far deeper. Our technology analyzes data sources based on a combination of WiFi, GPS, Cell tower, IP, and Bluetooth to verify a player’s location.



GeoComply's technology detects and blocks the use of proxies, VPNs, remote desktop software, virtual machines, mock location settings, developer tools; the list goes on. We employ full-time teams in multiple countries that keep up to date with the latest spoofing technologies available, and we regularly adjust our systems to detect them. By the time GeoComply's system approves or denies a geolocation transaction, it will have been subjected to over 350 analytical checks to verify that only legal bets are permitted.

To help illustrate how geolocation works for regulated internet sports betting we have a live demonstration of our technology in action. ([Demo & Explanation of PinDrop Map](#)).

This live map shows real-time geolocation checks occurring in Ohio, where GeoComply supports 100% of the online sports betting market. A significant portion of Ohio's current online sports betting traffic originates near the state's border, thus highlighting both the importance but also effectiveness of pinpoint accurate geolocation technologies.

Each of those pin drops is a user on a PC, Mac, iPhone, Android device, or tablet being securely located to either allow play within state borders, right up the state line or to block access for unauthorized users in close proximity to the border areas. These checks occur throughout the duration of an online session, where checking frequency is determined based on proximity to the border.

I now want to turn your attention to a supplementary Powerpoint document we prepared that looks at GeoComply data and demonstrates the level of interest in sports wagering in North Dakota. ("[North Dakota Sports Betting Data](#).")

North Dakotans are already familiar with GeoComply. Since the start of the NFL season, our technology has identified more than 35,000 North Dakota-based attempts to access legal sports books in other states. This came from more than 5,300 user accounts that we identified within the state. Of course, our technology blocked those individuals from placing a bet while in North Dakota.

Just looking at Super Bowl Sunday, we identified more than 1,000 of these types of transactions within North Dakota.

The reality is that players don't just try to bet from inside North Dakota and then give up after we block them. While GeoComply can monitor when a device in North Dakota tries to access a legal sports book in another state, we cannot track the tens of thousands of times North Dakotans placed bets on illegal, offshore sportsbooks. These illegal online sportsbooks actively prey on people in North Dakota. They are not regulated in the U.S., they provide zero consumer protections, and they deliver no benefit to the state.



Just a simple internet search, “Can I bet online in North Dakota” directs residents to a multitude of sites claiming to be “legitimate” and “legal”. Many provide bonuses and incentives urging North Dakotans to deposit money and start betting. Our supplementary document shows a few of the websites we found in our initial research.

GeoComply has built strong partnerships with operators and regulators in every state where our geolocation technologies are used. We are excited about the potential to expand our work in North Dakota where our robust geolocation solutions will continue to protect citizens and guarantee future online sports wagering in North Dakota is in full compliance with the demands of the law.

Thank you very much for the opportunity to testify today. I would be happy to address any questions you may have about the role geolocation technology will play in supporting North Dakota’s online sports betting industry.

Lindsay Slader, Sr. Vice President, Compliance – GeoComply
lindsay@geocomply.com

