April , 2026

Christopher Kirkpatrick, Secretary
Commodity Futures Exchange Commission
Three Lafayette Centre, 1155 21st Street NW
Washington, D.C. 20581
Refer to: "Prediction Markets" or RIN 3038-AF65

Re: Request for Extension of Time to Submit Comments Regarding Event Contract Derivatives Traded on Prediction Markets

Dear Secretary Kirkpatrick:

On behalf of the Seneca Cayuga Nation Office of the Gaming Commissioner ("SCNOGC"), I am writing to seek an extension of time to submit comments in response to the CFTC's Advance Notice of Proposed Rulemaking ("ANPR"), published on March 26, 2026, in the Federal Register, Vol. 91, No.50 p.12516. As a tribal gaming regulatory agency, our office has serious concerns about the subject matter of your proposed rulemaking. The scope and nature of the questions posed in the notice and our general lack of understanding about the regulatory functions of your agency, however, make it virtually impossible to offer meaningful comments in such a short timeframe.

We further urge the CFTC to conduct consultations with tribal governments and tribal gaming regulatory agencies before proceeding with the proposed rulemaking. Just as my agency lacks familiarity with your agency's functions, it is likely that your agency similarly lacks familiarity with the functions of tribal gaming regulatory agencies or the regulatory framework established pursuant to the Indian Gaming Regulatory Act of 1988 ("IGRA") 25 U.S.C. 2701 *et seq.* Under fundamental principles of federal Indian policy, it is neither appropriate or prudent for the CFTC to proceed with a rulemaking of potentially profound impact on tribal sovereignty without fair and meaningful consultation, consistent with Executive Order 13107.

We strongly urge you to both extend the proposed comment period by not less than sixty days and, in the interim, conduct consultation with tribal leaders and regulators.

Sincerely,



Danielle Brashear
Commissioner

23701 South 655 Road, Grove, OK 74344 | Telephone: 918.787.9703 | Fax: 918.787.2430 | dbrashear@sctribe.com