April 23, 2026

I am writing to urge the CFTC to maintain a clear distinction between traditional futures markets and the emerging sector of 'event contracts' on prediction markets. While traditional futures provide essential hedging utility for physical businesses (such as farmers or manufacturers), prediction markets, as currently marketed and used, function primarily as gambling platforms for retail users.

In determining regulatory oversight, the Commission must prioritize actual use over theoretical utility. Currently, these platforms target a demographic seeking speculative entertainment or "gaming" experiences in regions where such experiences are more heavily regulated, rather than commercial risk management. Allowing these products to avoid state gambling regulations by labeling themselves as "swaps" or "futures" is a bad-faith circumvention of the law. No reasonable person would agree to such labels in good faith. I insist that the CFTC does not equate these "speculative event contracts" with the legitimate, price-discovery functions of traditional commodity markets.

Sincerely,



Jason Nell
Accounting Student