April 27, 2026

Michael S. Selig
Chairman
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Comment for Proposed Rule 91 FR 12516

Dear Chairman Selig:

The Hispanic Leadership Fund is a nonpartisan advocacy organization dedicated to promoting common sense public policy that strengthens liberty, opportunity, and prosperity for all.

On behalf of our members across the country I write to respectfully urge the Commodity Futures Trading Commission to properly address the issues that have arisen from allowing so-called prediction markets to offer sports event contracts that are contrary to the public interest.

While we respect the Commission's jurisdiction and professionalism, it makes little sense that prediction markets' sports gambling products are regulated like financial instruments by the Commission rather than by state gambling agencies. That's because they clearly constitute unregulated gambling, misleading consumers and bypassing the law.

With the rapid growth in online sport betting nationwide since the Supreme Court effectively legalized it in 2018, it is athletics that is driving the action. A 2025 report from Keyrock and Dune Analytics found that sporting events account for about 85 percent of volume on one prediction market platform, for example.

Yet the current regulatory structure allows prediction markets to skirt state-mandated safeguards such as age minimums, gambling taxes, requirements for responsible gambling resources and other regulations that lawmakers and voters duly established as part of their decisions to greenlight sports betting in their jurisdictions.

Wrapping gambling in investment terminology misleads the American public. Muddying the distinctions between these two activities allows platforms to prey on Americans with lower levels of financial literacy as well as those with lower incomes—populations where even relatively small financial losses can have significant long-term consequences.

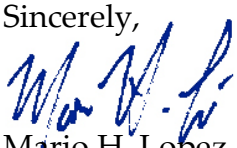
The unassuming user would have no idea that they are using a platform that isn't held to the same regulatory standard as legal sportsbooks.

True innovation in the financial services industry should be about expanding pathways for wealth creation and opportunity. Sports-based prediction markets do the opposite: they hurt working families by luring users into repeatedly draining their income by funneling more money into their accounts, taking away from real investments, like savings, education, or other long-term financial goals.

Allowing unregulated sports gambling to be deceptively sold as investing amounts to financial exploitation that results in reduced economic mobility for users.

We urge the Commission to do the right thing and prevent prediction markets from offering sports event "contracts"—which are in reality just sports betting by another name.

Sincerely,



Mario H. Lopez
President