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April 28, 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

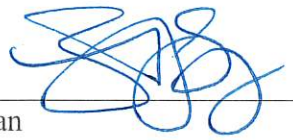
Dear Secretary Kirkpatrick:

On behalf of the Ohkay Owingeh, thank you for your decision to review the serious matter that is prediction markets through the Advance Notice of Proposed Rulemaking ("ANPR") published in the *Federal Register* on March 26, 2026. While we appreciate the opportunity to comment on this issue, we request that the CFTC grant a minimum ninety-day extension of time to submit such comments. In making this request we note the expansive scope of questions presented by the ANPR, and more importantly, the lack of tribal consultation on the matter. The existing government-to-government relationship between tribal and federal governments mandates meaningful and effective consultation on matters impacting tribal governments. The matter of prediction markets as a platform for illegal gambling is certainly an issue that would qualify as a matter impacting tribal governments and therefore requires proper consultation.

The results of this ANPR are of great importance to tribally-owned gaming operations, such as our Ohkay Casino Hotel which serves as a significant generator of income for Ohkay Owingeh, It is therefore vital that we have the opportunity to meaningfully participate in the notice and comment period, especially where the CTFC's questions relate to events contracts involving gambling. While our expertise in the field of tribal gaming is vast, Ohkay Owingeh cannot provide the CFTC with thoughtful responses to the ANPR without ample time to fully understand the numerous elements involved in predictions markets. A tribal consultation session and an additional ninety-days to submit comments would allow sufficient time to draft informed responses to the CFTC's questions and would be consistent with the principles of the government-to-government relationship with which the CFTC must cooperate.

We urge the CFTC to honor the government-to-government relationship between tribal and federal governments by providing the opportunity for adequate tribal consultation and by granting an extension of no less than ninety (90) days to the April 30, 2026 deadline to submit comments in response to the ANPR. We eagerly await your favorable response to this request.

Sincerely,



Ben Lujan
Governor, Ohkay Owingeh

4/29/26
Date