



## NATIONAL FOOTBALL LEAGUE

March 29, 2026

NAME  
COMPANY  
ADDRESS

Dear [Name],

We write in reference to the “Prediction Markets Advisory” released on March 12, 2026, by the Commodity Futures Trading Commission for sports prediction markets.

There is no greater priority for the NFL than protecting the integrity of our games and the welfare of our players. Fans, players, coaches, officials and personnel deserve to know that we are doing everything possible to ensure no improper influences affect how our games are played and that we are taking all appropriate steps to ensure that game participants are not subjected to unfair and unwarranted allegations relating to sports gambling and prediction markets wagering on our games.

While legal challenges are being decided in the courts -- and while additional prediction-market standards, regulations, oversight and possibly even federal legislation are needed to better protect the integrity of sporting events, including NFL games -- it is encouraging that the CFTC recognizes that sports related prediction markets should be regulated differently than other futures contracts and is taking timely action to start that process. The NFL calls on designated contract markets (DCMs) to refrain from offering contracts across all exchanges and mobile platforms in specific categories, many of which the League has long referred to as “objectionable bets” in the legalized, state-regulated sports betting marketplace. The League requests that all DCMs refrain from offering contracts in the following categories:

- Easily Manipulable by a Single Person (game related and non-game related)
- Inherently Objectionable
- Officiating Related
- Knowable in Advance

Examples of contracts in these categories include, but are not limited to, the following:

### Easily Manipulable by a Single Person

- Game Related
  - will a kicker miss a field goal
  - will a quarterback’s first pass be incomplete
  - will a receiver’s first target be incomplete
  - will a running back rush for fewer than X number of yards on 1st rushing attempt

- Non-Game Related
- broadcast mentions
- fan / celebrity attendance

Inherently Objectionable:

- player injuries
- fan safety
- player misconduct

Officiating Related:

- timing, number, or types of penalties
- officiating actions
- replay results
- officiating assignments

Knowable in Advance:

- the first play of the game
- roster / personnel decisions (e.g., which players will start a game, which team will a player sign with, etc.)
- who will be traded/hired or fired (including during the offseason)
- live pick-by-pick contracts on who will be drafted
- coaching decisions

We would be happy to meet in the future to discuss our views on sports prediction markets in greater detail, including prohibited bettors, information sharing with leagues and responsible betting measures. Please contact Sabrina Perel ([sabrina.perel@nfl.com](mailto:sabrina.perel@nfl.com)) with any questions.

Very truly yours,

Sabrina Perel  
Chief Compliance Officer, NFL