



*VIA Electronic Submission and Email*

Mr. Christopher Kirkpatrick  
Secretary of the Commission  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, NW  
Washington, DC 20581

**Re: Commodity Futures Trading Commission Rule 40.11  
Review of Proposed RSBIX NFL Futures Contracts (Industry Filing 20-004)**

Dear Mr. Kirkpatrick:

We have read the questions that the CFTC is raising as it relates to RSBIX NFL Futures Contracts, and we write to convey our support for the listing of these contracts.

First, we would like to point out that sportsbooks are now able to operate legally, under current Nevada state and federal law, and have been for decades. 25 states and the District of Columbia currently host or have passed laws or referenda permitting sports betting. As a licensed casino and sportsbook, we operate in full compliance with all applicable laws and regulations. Nothing about our business, nor the RSBIX NFL Futures Contracts, is "unlawful under any State or Federal Law," as described in Commission regulation 40.11(a)(1).

Second, the RSBIX NFL Futures Contracts will serve an important economic purpose for our industry by allowing regulated sportsbooks to better manage economic risk. These contracts are not bets or wagers by any measure; rather they will allow our industry access to the same kinds of valuable hedging tools that are used by many other industries.

We urge the Commission to determine that the listing of these contracts is in the public interest.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Seth Schorr", is written over a blue horizontal line.

Seth Schorr

CEO, Fifth Street Gaming, LLC

Chairman, Downtown Grand Hotel & Casino