

1. The proposed contracts do not involve gaming. Politics is no mere sport, carried out for the entertainment and fleecing of bystanders, to the enrichment of the participants. In a legitimate sport, both the victor and the loser gets paid, as recognition for their services. However, political contests only benefit the candidate whomstve emerges victorious, and their extended family.
2. The Commission should pay no heed to the availability of similar bets in traditional gambling venues such as casinos. Yes, if I wanted to, I could fly to Vegas and gamble away my life savings at ease. But this is not a sufficient substitute, as it does not provide the instant gratification that comes from being able to gamble from the comfort of my house, in my underwear. I would go one step further and suggest that the Commission explicitly permit Kalshi to accept instant cryptocurrency transfers, which is universally acknowledged as the goated medium of exchange for degenerate gamblers.
3. As someone who commits three felonies a day (in other words, an American citizen), I would presume that this violates regulations too numerous to count. However, as a legal realist, I must too recognize that the odds of anyone being prosecuted for gambling on an election website is approximately null, excepting if Donald Trump were to purchase \$851 worth of any contract.
4. I would certainly hope that the Commission does not engage in rule-making under the influence.
5. The Nadex contracts in question are older than the dinosaurs and self evidently obsolete. Elections in 2022 are substantially different than those in 2012, involving a different populace, different candidates, and a newly gerrymandered map, along with extensive hard work at voter suppression. Additionally, the Apr 2nd date of the order unceremoniously banishing Nadex to the nether regions suggests the possibility of the whole thing being an elaborate April fools prank. The Commission should ignore the decision of the prior Commissioners. You are in charge now; act like it.
6. I expend significant resources each election cycle bribing politicians across the country. The proposed contracts are essential in hedging my investments. Without the ability to hedge, I would be forced to cut such activities, as the risk of loss would be too high.
7. The risks of my preferred political party being in power cannot be hedged via existing derivative products, as those are tied to specific assets that may not necessarily move in the same direction as the assets I expect my politicians to promote.

8. If Henry Ford had asked his customers what they wanted they would have said a faster horse. The lack of any plausible, conceivable, or metaphysically possible legitimate hedging uses for a market should not deter the Commission from expeditiously approving this application. If you build it, people will come. In addition, requiring evidence from users of their hedging uses violates their First Amendment rights; cf Citizens United.

9. The Commission should not consider contract sizes in determining the hedging utility of the product. There are at least two sides to every market; if my legitimate hedging needs require attracting large amounts of small retail users on the other side, that should be encouraged. I would further suggest encouraging the use of at least 100x leverage, if not more, so smaller users can help support the liquidity needs of "whales" such as myself.

10. Our entire computational economy is built on the binary system. Anything and everything can be reduced into binary terms. A sufficient number of binary contracts can be utilized to hedge any event, including nonbinary ones.

11. The contracts serve a legitimate and highly desirable pricing function. For example, a store could sell people political apparel such as t-shirts or caps on credit, and their underwriter can price the default risk based on the probabilities of the relevant political party being in power.

12. To paraphrase James Burnham, the public may not be interested in the proposed contracts, but the proposed contracts are interested in the public. If there is uncertainty about how much public interest there might be in these markets, I would simply suggest adding additional markets to determine that.

13. I was going to write a detailed response to this question but I got distracted by the apparently unironic use of "perception of the integrity of elections" in \$CURRENT\_YEAR.

14. As discussed in my response to 3, this likely violates many such laws. Regarding the specific concern of campaigns using some kind of Morse code signalling via election market pricing to bypass restrictions on coordinations between CCCs and PACs, I personally and respectfully submit this is improbable.

15. This concern is misplaced. Everyone who has not yet voted is in exclusive possession of non-public polling data with  $n=1$ . Trading on private information is not and has never been improper. And the Commission is well placed to enforce prohibitions on

illegal insider trading, as long as it's not by current, former, or future members of Congress.

16. I object to the implication that Nancy Pelosi can freely trade whatever stonks she wants, but when a new innovative market wants to offer similar hedging instruments to members of Congress they should be prevented from doing so. Our Congresscritters should be equally allowed to degenerately gamble away their life savings and federal pension as any other American.

17. Respectfully, none.