

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

KEVIN CLARKE, et al.

Plaintiffs,

V.

COMMODITY FUTURES TRADING
COMMISSION,

Defendant.

Cause No. 1:24-cv-00614-DAE

The Honorable David A. Ezra,
District Judge

Magistrate Judge Mark Lane

SUPPLEMENTAL RECORD

PRODUCED BY COMMODITY FUTURES TRADING COMMISSION, MARCH 7, 2025

Supp. Rec. Doc #	Date	Document Description
1	2/5/1992	CFTC Division of Trading and Markets no-action letter for Iowa Presidential Stock Market to Professor George R. Neuman of The University of Iowa
2	6/18/1993	CFTC Division of Trading and Markets no-action letter to Professor George Neuman of The University of Iowa for Iowa Electronic Markets
3	5/7/2008	CFTC Concept Release on the Appropriate Regulatory Treatment of Event Contracts
4	4/2/2012	Order prohibiting North American Derivatives Exchange, Inc., from listing political event contracts
5	2/24/2014	Email from University attorneys with draft no-action letter request and attaching background information
6	1/7/2014	Email exchange between DMO staff and attorneys representing Victoria University after outreach from University attorneys indicating that University wanted to offer election contracts like the University of Iowa does, for research purposes.

7	2/24/2014	Draft no-action letter request by attorneys for Victoria University
8	2/24/2014	Background on "Integrity Financial Services KYC Compliance & Anti-Fraud" attached to email from Victoria University counsel in connection with no-action relief request
9	3/4/2014	Email from DMO Chief Counsel to Victoria University attorney regarding status of initial review of draft no-action letter request
10	3/28/2014	Email exchange between DMO Chief Counsel and Victoria University attorney regarding status of DMO staff review of draft no-action letter request
11	4/17/2014	Email from Victoria University counsel to DMO Chief Counsel with revised draft no-action letter request
12	4/17/2014	revised draft no-action letter request from Victoria University
13	5/13/2014	Email from DMO staff to attorney for Victoria University regarding no-action letter request
14	6/20/2014	Email exchange between DMO staff and Victoria University attorney regarding draft request for no-action letter
15	6/26/2014	Email exchange between DMO staff and Victoria University attorney regarding request for no-action letter
16	6/26/2014	Email exchange between DMO staff and Victoria University attorney regarding request for no-action letter
17	6/26/2014	Victoria University request for no-action letter
18	8/25/2014	Email from DMO staff to University attorney with questions on University request for no-action relief
19	9/30/2014	Email exchange between DMO staff and Victoria University regarding status of request for no-action relief
20	9/30/2014	Email exchange between DMO staff and Victoria University regarding status of request for no-action relief
21	10/29/2014	Email exchange between DMO staff and Victoria University regarding status of request for no-action relief
22	3/28/2016	3/28/2016 meeting request of Victoria University of Wellington to meet with CFTC Chairman
23	5/9/2016	Email exchange between DMO staff and attorney for Victoria University regarding University's request to adjust participation limits

24	9/26/2016	Email from non-CFTC employee with concerns about Vitoria University operating outside scope of no-action relief
25	11/7/2017	Email from DMO attorney to counsel for Victoria University with comments regarding draft University request for amended no-action relief
26	11/7/2017	draft Victoria University request for amended no-action relief
27	12/8/2017	Email from Victoria University attorneys to DMO staff with revised request for amended no action relief
28	1/3/2018	Email exchange between DMO attorneys and Victoria University counsel regarding draft request for amended no-action relief
29	1/24/2018	Email exchange between DMO staff and PredictIt attorneys regarding questions about loss limitations on PredictIt platform
30	2/1/2018	Screen shots by CFTC staff of certain PredictIt market event contracts
31	2/1/2018	Screen shots by CFTC staff of certain PredictIt market contracts
32	2/1/2018	Screen shots by CFTC staff of certain PredictIt market contracts
33	3/28/2018	Email from DMO Staff with points to discuss regarding Victoria University request to amend 2014 Letter
34	4/6/2018	Email exchange between DMO staff and attorney for Victoria University regarding University request to amend no-action relief
35	4/12/2018	Email exchange between DMO staff and attorney for Victoria University regarding Victoria University request to amend no-action relief
36	6/26/2018	Email from Victoria University attorneys to DMO staff regarding request for amended no-action relief
37	10/1/2018	Email from PredictIt counsel to CFTC staff regarding predictive value
38	5/20/2019	Letter from Aristotle to DMO Director with Petition for Action on Event Markets
39	7/18/2019	Email from PredictIt attorneys to DMO Director regarding request for amended no-action relief
40	8/26/2019	Email exchange between PredictIt Attorneys and DMO Director

41	9/6/2019	Email from PredictIt attorney regarding gathering data and responding to issues raised by DMO staff
42	9/6/2019	Email from DMO Staff to PredictIt attorney with questions and information requests relating to PredictIt
43	9/9/2019	Email from Victoria University attorneys to DMO staff responding to DMO request for information
44	9/18/2019	Email from Victoria University attorneys with responses to information requests from DMO staff
45	9/18/2019	Victoria University / Aristotle responses to requests for information from DMO staff
46	9/18/2019	Letter relating to information provided by Victoria University in response to DMO requests
47	9/19/2019	Email from Victoria University attorney to DMO staff regarding DMO requests for information and data
48	10/3/2019	Email exchange between DMO staff and
49	10/7/2019	Email from PredictIt attorneys seeking further discussions relating to scope of no-action relief
50	10/16/2019	Email exchange between DMO staff and attorney for PredictIt regarding status of discussions
51	11/4/2019	Email exchange between DMO staff and attorney for PredictIt regarding status of discussions
52	11/6/2019	Email exchange between DMO staff and attorney for PredictIt regarding status of discussions
53	1/17/2020	Email exchange between PredictIt attorneys and DMO staff and Director regarding scope of no-action relief
54	1/24/2020	Email between PredictIt attorneys and DMO staff regarding request to list new contracts
55	1/29/2020	Email from PredictIt counsel with information relating to event contract markets and PredictIt platform
56	3/4/2020	Email exchange between DMO staff and PredictIt attorneys regarding additional information about event contract markets and PredictIt
57	3/12/2020	PredictIt website market screen shots
58	3/12/2020	PredictIt website market screen shots
59	3/12/2020	PredictIt website market screen shots
60	3/12/2020	PredictIt website market screen shots
61	3/12/2020	PredictIt website market screen shots

62	2/5/2020	Email from PredictIt attorney to DMO staff regarding event contract markets and PredictIt platform
63	3/8/2021	Email exchange between DMO staff and Victoria University attorneys seeking information relating to PredictIt
64	5/12/2020	Email from PredictIt counsel to DMO and DOE staff with information regarding PredictIt
65	5/13/2020	Email exchange between PredictIt attorneys and DMO staff regarding scope of no-action relief
66	5/14/2020	Email exchange between PredictIt attorneys and DMO staff regarding no-action relief
67	5/21/2020	Email from DMO Director to PredictIt attorneys requesting information regarding PredictIt
68	5/21/2020	Email from PredictIt attorney with information regarding Predictit contracts
69	6/8/2020	Email from PredictIt counsel regarding listing new contracts
70	6/15/2020	Email from PredictIt attorneys regarding scope of no-action relief
71	6/16/2020	Email from DMO Director to PredictIt attorneys regarding request to list new contracts
72	7/21/2020	Email from Aristotle executive to counsel to Chairman regarding event contract markets
73	7/31/2020	Email from PredictIt attorneys to DMO staff responding to questions about scope and purpose of contracts offered on PredictIt
74	10/26/2020	Email from PredictIt counsel regarding letter sent to CFTC Chairman
75	10/26/2020	Aristotle and PredictIt letter to Chairman regarding with argument regarding scope of no-action relief
76	6/25/2021	Email exchange between DMO staff and PredictIt attorneys seeking clarification of legal representation of entities operating PredictIt
77	6/29/2021	Email from PredictIt attorneys to DMO attorneys regarding attorney representation of entities operating PredictIt
78	7/1/2021	Email from PredictIt attorneys to DMO staff regarding PredictIt offering climate related environmental contracts

79	7/15/2021	Email from PredictIt attorneys regarding listing of climate related environmental contracts
80	7/15/2021	Email from DMO Director seeking clarity on requests for meetings from PredictIt attorneys
81	7/16/2021	Email exchange between PredictIt attorneys and DMO Director and staff regarding offer of environmental contract markets on PredictIt
82	12/21/2021	Email from PredictIt attorney to CFTC attorney regarding PredictIt and event contract markets
83	12/21/2021	Research paper sent by PredictIt attorneys to CFTC staff
84	12/21/2021	List of academics using PredictIt sent by PredictIt attorneys to CFTC staff
85	12/21/2021	Research paper sent by PredictIt attorneys to CFTC staff
86	12/21/2021	Letter from Congressman to CFTC Acting Chairman sent by PredictIt attorneys to CFTC staff
87	12/21/2021	Research paper sent by PredictIt attorneys to CFTC staff
88	12/21/2021	Letter sent by PredictIt attorneys to CFTC staff
89	12/21/2021	Research paper sent by PredictIt attorneys to CFTC staff
90	12/21/2021	Letter from academic institutions regarding use of PredictIt event contract market
91	5/2/2022	Email from PredictIt attorney to DMO Director regarding environmental contracts and scope of no-action relief
92	5/11/2022	Email from DMO Director to PredictIt attorneys seeking clarification of legal representation of Victoria University and PredictIt
93	5/11/2022	Email from Aristotle and PredictIt counsel regarding scope of representation of Victoria University
94	5/11/2022	Email from PredictIt attorneys regarding Aristotle application to register with CFTC as Designated Contract Market and Designated Clearing Organization.
95	6/7/2022	Email from CEO of Victoria University regarding representatives of PredictIt exchange
96	6/7/2022	Meeting invite from DMO staff to attorneys for and executives of Victoria University regarding 2014 no-action letter
97	6/8/2022	Email from Victoria University attorney to DMO staff regarding call relating to impending withdrawal of 2014 no-action relief

98	6/13/2022	Email from PredictIt attorney to DMO staff regarding DMO notice of impending withdrawal of no-action relief
99	6/14/2022	Meeting invite from DMO staff to PredictIt and Victoria University for call regarding withdrawal of 2014 no-action letter
100	6/14/2022	Email from PredictIt attorneys to DMO staff regarding participants for call regarding DMO staff withdrawal of 2014 no-action relief
101	6/21/2022	Email exchange between DMO staff and PredictIt attorneys regarding status of steps by PredictIt in response to notice of impending withdrawal of 2014 no-action letter
102	6/29/2022	Meeting invite from DMO staff to PredictIt attorneys to discuss withdrawal of 2014 no-action letter to Victoria University
103	7/7/2022	Meeting invite from PredictIt attorney to DMO staff and Victoria University counsel to discuss impending withdrawal of 2014 no-action letter
104	7/7/2022	Meeting invite from DMO Director to PredictIt and Victoria University counsel to discuss impending withdrawal of 2014 no-action relief
105	7/11/2022	Meeting invite from DMO staff to PredictIt and Victoria University counsel to discuss wind-down of PredictIt exchange given impending withdrawal of no-action relief
106	7/25/2022	Email from DMO staff to PredictIt and Victoria University attorneys scheduling meeting regarding PredictIt
107	7/26/2022	Meeting invite from DMO staff to PredictIt and Victoria University attorneys scheduling a meeting to discuss Victoria University
108	7/26/2022	Meeting invite from DMO staff to PredictIt and Victoria University attorneys scheduling a meeting to discuss Victoria University
109	8/4/2022	Meeting invite from DMO staff to PredictIt and Victoria University attorneys scheduling a meeting to discuss issuance of 2022 withdrawal letter
110	8/4/2022	Email from DMO Director to PredictIt attorneys regarding issuance of letter withdrawing 2014 no-action letter

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