



CFTC Comment Submission

April 24, 2026

The Honorable Michael Selig, Chairman
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

RE: National Council on Problem Gambling’s Public Comment on Commodity Futures Trading Commission’s Advance Notice of Proposed Rulemaking Regarding Event Contact Derivatives

Dear Chairman Selig:

I. Introduction

I write on behalf of the National Council on Problem Gambling (“NCPG”), the sole national advocate for those suffering from problem gambling and their loved ones, and its state affiliates listed below, to submit this public comment responding to the Commodity Futures Trading Commission’s (“CFTC”) notice of proposed rulemaking on event contract derivatives traded on prediction markets (91 FR 12516). We emphasize here and in our responses that, for individuals trading event contract derivatives on prediction markets, the activity is functionally gambling, and rules that prioritize customer health must be implemented for prediction markets.

Since NCPG was founded in 1972, we have remained neutral, neither for nor against legalized gambling. NCPG members include 36 state affiliate chapters and a wide variety of individuals and organizations—from counselors, prevention specialists and researchers to people in recovery from gambling problems as well as treatment clinics, gambling operators and vendors, regulatory authorities, sports leagues, and state human services agencies. NCPG’s mission is to lead awareness and advocacy efforts to reduce gambling-related harm. Our vision is to advance wellbeing by minimizing harm from gambling problems.

NCPG represents those who suffer from gambling addiction and those in recovery who remain anonymous. We advocate on behalf of children and adults who are harmed now and in the future by gambling and its expansion into novel platforms. We have seen firsthand the devastating impacts of a gambling addiction on individuals and their families as well as the effectiveness of services that provide help and hope for those who struggle. We can never eliminate the disease of



gambling addiction, but we can and must make better efforts to prevent and treat it by implementing proper rules relating to prediction markets that prioritize customer health.

II. Executive Summary

Before answering specific questions posed by the CFTC in its notice of proposed rulemaking, there are two premises that underly each of our recommendations below. First, it is clear to NCPG that purchasing event contracts is functionally gambling. While we do not take a position as to whether the activity is legally gambling, our experience and expertise convince us that no matter the nomenclature used for the activity, it is functionally gambling. The activity is functionally gambling because it includes the three core elements of gambling: consideration, chance, and prize. We believe that any activity that is functionally gambling, including purchasing event contracts, can cause gambling harm to individuals and their loved ones.

Second, given that this activity can cause harm to individuals and their loved ones, it must be regulated to include protections against problem gambling, even if it is ultimately legally referred to as “trading” or a similar term. NCPG urges the CFTC and all stakeholders to acknowledge that this activity is functionally gambling, and participation puts an individual at risk for developing a gambling problem.

Response to Question 2(f)

NCPG believes that for retail customers, purchasing event contract derivatives on margin is akin to purchasing on credit. Research has shown that gambling on credit is a risk factor for the severity of a gambling problem. NCPG has long held that gambling should not be permitted on credit, and similarly, NCPG believes that trading on margin should also not be permitted for retail customers.

Response to Question 7

NCPG believes that the CFTC should include factors that protect underage populations when determining if an event contract is contrary to the public interest. Factors considered should include: whether an event contract will be especially appealing to underage participants; and whether an event contract hinges on the participation of an underage population. Without factors such as these, children will be put at further risk of gambling harm as well as potentially put in other unsafe situations by those attempting to influence a contract event. As with all forms of gambling, prediction markets are not for children and there must be protections in place to ensure they are specifically protected from gambling harm.



Response to Question 19(e)

NCPG believes the CFTC must include requirements in the rules for robust responsible gambling standards that prioritize customer health for all platforms offering event contract derivatives to retail customers. The CFTC should look to NCPG guidelines of best practices for internet gambling operators and regulators known as the Internet Responsible Gambling Standards (“IRGS”). Although originally written for traditional gambling, the IRGS is almost entirely applicable to event contract derivatives and prediction markets. Topics covered that should be applied to prediction market platforms include but are not limited to: Corporate Governance, Account Information and Limit Setting, Time Outs and Self-Exclusion, Access to Help, Advertising, and Age of Participation. The IRGS serves as a roadmap for the CFTC and prediction market platforms to prioritize customer health and ensure the activity is offered, promoted, and conducted responsibly.

III. General Comments

a. Purchasing Event Contracts is Functionally Gambling

NCPG takes no stand and makes no argument as to whether trading event contract derivatives does or does not *legally* constitute gambling. However, from our over 50 years of experience in the field, expertise in problem gambling, and conversations with researchers, clinicians, and individuals in recovery, we are certain that trading event contract derivatives is *functionally* gambling. Trading event contract derivatives includes the three elements of gambling. These are: Consideration (customer must use money or something of value to participate), Chance (the result of the contract is not 100% certain as the event has not occurred), and prize (the customer will earn more money or value than they risked if they are successful). Any activity that is functionally gambling, including trading event contract derivatives, can cause gambling harm to individuals and their loved ones. As the public comments to this proposed rulemaking are evaluated, the CFTC may decide that this activity should not be called gambling, and continue to use the term “trading” or similar terminology. It makes no difference to NCPG what the activity is called, we know that it is functionally gambling and, therefore, must be regulated with substantially similar protections to what we see states and tribal governments implement with respect to traditional gambling. NCPG is neutral as to the legalization of gambling, but we are not neutral as to the regulation of gambling. Thus, we urge the CFTC to regulate this activity thoroughly to protect all customers.



b. Purchasing Event Contracts Must Include Protections Aimed at Reducing Harm

Whatever terminology the CFTC decides is appropriate for the buying and selling of event contract derivatives, one thing is clear, the widespread promotion and access to the activity will lead to gambling problems for some individuals. Before addressing our more specific concerns and recommendations around how to make the prediction market environment safer and more sustainable, we urge the CFTC and all stakeholders to acknowledge that this activity is functionally gambling, and participation puts an individual at risk for developing a gambling problem. Once this premise is accepted, it becomes the responsibility of all of us to work to mitigate gambling harm. All recommendations below flow from this premise.

IV. Response to Questions

a. Response to Question 2(f)

Question 2(f) asks whether trading on margin should be permitted for customers, and the specifics surrounding when and how it should be permitted. NCPG believes that for retail customers, purchasing event contract derivatives on margin is akin to purchasing on credit. NCPG has long held that gambling should not be permitted on credit, and similarly, NCPG believes that trading on margin should also not be permitted for retail customers.¹

The risks of gambling with funds that one does not necessarily have, such as on a credit card or on margin, are extraordinarily high. Gambling on credit not only increases the risk of accumulating debt that can quickly overcome an individual's ability to pay it off, it can also give an individual a false sense of separation from monetary losses, and the individual may fail to grasp that the losses will further exacerbate their debt burden. A 2019 review of gambling-related consumer credit use and accompanying debt problems found that "consumer credit use and debt problems are risk factors for increased problem gambling severity" and that "[c]onsumer credit products...have the potential to exacerbate gambling-related psychosocial harms."² According to 2024 research commissioned by NCPG, 19 states ban sports betting operators from offering credit

¹ See e.g. National Council on Problem Gambling, Internet Responsible Gambling Standards, December 2023, available at: <https://www.ncpgambling.org/wp-content/uploads/2024/01/Internet-Responsible-Gambling-Standards-Rev.-12-2023-FINAL.pdf>, p. 13 ("Customers [should not be able to] obtain a line of credit from the platform" and "the platform [should not] accept credit card payments.").

² Thomas B Swanton, Sally M Gainsbury, Gambling-related consumer credit use and debt problems: a brief review, *Current Opinion in Behavioral Sciences*, Volume 31, 2020, Pages 21-31, ISSN 2352-1546, <https://doi.org/10.1016/j.cobeha.2019.09.002>.

to consumers; and 6 ban the use of credit cards outright.³ The number of states banning the use of credit cards for sports betting is continuously increasing as more state bills become law and more regulators unveil rules banning the activity.⁴

Therefore, NCPG urges the CFTC to ban the ability to trade on margin for retail customers. The risk to customers far outweighs any benefit. Gambling should never be permitted on credit, and purchasing event contract derivatives is no different.

b. Response to Question 7

Question 7 asks what factors the CFTC should consider in making a determination that certain event contracts are “contrary to the public interest” under CEA section 5c(c)(5)(C). Given that NCPG maintains a neutral stance on legalized gambling, we typically do not offer opinions on any specific event contract or gambling market and whether it should be legal. However, underage gambling is not only especially risky to minors, it is also illegal gambling, and NCPG is strongly opposed to illegal gambling. We believe the CFTC should include factors that protect underage populations when determining if an event contract is contrary to the public interest.

NCPG urges the CFTC to consider as a factor whether an event contract will be especially appealing to underage participants. Research is clear that young people are at greater risk of gambling problems due to cognitive immaturities and poor understanding of statistical probabilities.⁵ Studies have shown a positive association between beginning to gamble before the age of 18 and risk for gambling problems.⁶ There is no reason to think that trading event contracts would have a different effect on a young person given that it is functionally gambling.

With the wide-ranging array of event contracts currently offered at any given time on event contract platforms, without proper rules or regulations, it is not hard to imagine a platform offering markets on activities geared towards children. For example, a platform could foreseeably offer a market on what will happen in an upcoming episode of the Harry Potter television series, or the

³ National Council on Problem Gambling, *Report: U.S. States’ Online Sports Betting Regulations An Evaluation Against NCPG Standards*, June 2024, (pg 9 of https://www.ncpgambling.org/wp-content/uploads/2024/09/NCPG_Vixio-U.S.-States-Online-Sports-Betting-Regulations.pdf).

⁴ See e.g. Koval, Illinois Moving to Ban Using Credit Cards for Sports Betting, April 25, 2025, available at: <https://wgntv.com/news/illinois/illinois-moving-to-ban-using-credit-cards-for-sports-betting/>.

⁵ See e.g. Chambers RA, Potenza MN. Neurodevelopment, impulsivity, and adolescent gambling. *Journal of Gambling Studies*. 2003;19:53–84, available at: <https://link.springer.com/article/10.1023/A:1021275130071>; and Delfabbro P, Lahn J, Grabosky P. It’s not what you know, but how you use it: Statistical knowledge and adolescent problem gambling. *Journal of Gambling Studies*. 2006;22:179–193 (available at: <https://psycnet.apa.org/record/2006-11001-003>).

⁶ Pérez L., Too Young to Gamble: Long-term Risks from Underage Gambling. *J Gambl Stud*. 2024 Sep;40(3):1575-1584. doi: 10.1007/s10899-024-10319-1. Epub 2024 May 29 (available at: <https://pubmed.ncbi.nlm.nih.gov/38809356/>).



number of views a specific TikTok video oriented towards teenagers will accumulate. Advertisements for these markets may even some day include depictions of those characters or celebrities. Markets like these would likely be especially appealing to children and may make them more likely to find a way to participate. For example, in the more traditional gambling ecosystem, we have seen children get creative in order to access online gambling platforms. This includes using their parent’s login information, using a legal aged classmate to place wagers on their behalf, or finding other technological methods of accessing gambling platforms. Under the current prediction market rules, we have heard of underage individuals routinely accessing approved event contracts via a crypto wallet.

This type of consideration is not without precedent. For example, the majority of states that have legalized sports betting ban depictions that may appeal to minors.⁷ In addition, the responsible gambling guidelines for lotteries created by the North American Association of State and Provincial Lotteries (NASPL) prohibits “symbols” or “language that are primarily intended to appeal to minors” on lottery materials.⁸ The CFTC should consider similar protections as a factor in its upcoming rulemaking for prediction markets.

Similarly, NCPG urges the CFTC to consider a factor on whether an event contract hinges on the participation of an underage population. For example, a platform could offer sports event contract markets on a high school football game. Not only might this market appeal to underage participants, but it also hinges on the actions of underage individuals. This type of market would put children in the contract’s event inappropriately, and may lead to dynamics that put a child in an unsafe situation—whether it be an attempt by a market participant to influence the outcome of the event, or a market participant angry at the result of the event for which they had purchased contracts. In addition, it exposes a child to gambling behaviors in a way that encourages or normalizes the behavior.

Due to these concerns, when legalizing sports betting, many states have banned betting on sporting events that feature participants of whom a majority are underage, or on events that are not made up of professional athletes.⁹ States understand the risk of putting children in the event that determines the outcome of a bet. Therefore, NCPG urges the CFTC to consider a factor that would similarly protect children.

⁷ See *Supra* FN 3 at pg 8.

⁸ NASPL Guidelines for Responsible Gambling, August 2019, available at: https://www.nasplmatrix.org/rg/files/NASPL_Guidelines_Responsible_Gambling_2019.pdf.

⁹ See e.g. 2025 Indiana Code [§ 4-38-2-3](#) and [5§ 4-38-5-5](#).

c. Response to Question 19(e)

Question 19(e) asks about what aspects of responsible gambling standards should the CFTC consider in its public interest determination. NCPG believes the CFTC must include requirements in the rules for robust responsible gambling standards that prioritize customer health for all platforms offering event contract derivatives to retail customers. For guidance, NCPG maintains guidelines of best practices for internet gambling operators and regulators known as the Internet Responsible Gambling Standards (“IRGS”)¹⁰. This document was originally written in 2012 to assist regulators and operators in the development of online gambling platforms. The document has been routinely updated since then, most recently in 2023, as new trends and data emerge. NCPG is working on releasing a newly updated version this year as well. Although originally written for traditional gambling, the IRGS is almost entirely applicable to event contract derivatives and prediction markets.

This public comment uses the term “gambling” when discussing the best practices outlined in the IRGS below because that is what the IRGS uses, but whether the buying and selling of future contract derivatives is called “gambling” or “trading” makes no difference to the relevance of the IRGS to the activity. NCPG urges the CFTC to implement as much of the IRGS as applicable. Many of the below recommendations come directly from the IRGS but should not be thought of as exhaustive of what is recommended in the document. Each recommendation has a more detailed explanation in the IRGS, and the IRGS contains additional best practices. Other recommendations, where noted, come from state law or industry codes of conduct.

Governance

NCPG urges the CFTC to require prediction market platforms to incorporate responsible gambling into its corporate governance, similar to the IRGS’s Governance standards.¹¹ The platform’s corporate entity should have a corporate responsible gambling policy that identifies the company’s clear commitment to responsible gambling, customer protection, and mitigating gambling-related harm. In addition, the company should have a responsible gambling strategy with defined goals and a clear plan of action that incorporates the IRGS. The company should require all staff to be trained in responsible gambling and the signs or symptoms of problem gambling. Over half of states with legal online gambling have similar requirements to the IRGS in their state laws and regulations.¹²

¹⁰ See *Supra* FN 1.

¹¹ See *Supra*, FN 1 (p. 3 of <https://www.ncpgambling.org/wp-content/uploads/2024/01/Internet-Responsible-Gambling-Standards-Rev.-12-2023-FINAL.pdf>).

¹² See *Supra* FN 3.

Account Information and Limit Setting

Prediction market platforms should be required to make account information and limit setting tools easily accessible to customers, similar to the IRGS's Account Information and Limit Setting standards.¹³ The type of account information that a customer should be able to easily find on the platform include:

- Amounts wagered, won and lost
- Time spent gambling
- Money spent
- Restrictions, such as self-exclusion and limits
- How often limits were met
- Net profit and loss of a user-defined period

This information is crucial for customers to be able to make informed decisions about their play. Informed decision making can help customers recognize patterns that may be contributing (or will contribute) to a problem and to be empowered to adjust those patterns.

Platforms should also, upon account creation and on a regular basis, encourage customers to set limits on the amount of time and money they spend using the platform. Although including an opt-out is acceptable, limit-setting should be the default for all new customers. Customers could also be incentivized to set limits after opting out by being offered other benefits by the platform. Typical limit-setting includes the ability to set daily, weekly, or monthly limits on the size of deposit, frequency of deposit, and the amount of time they spend on the platform. Participation should be halted when a customer reaches their pre-set limit. Customers should not be able to relax limits until the current limit settings expire.

In addition, customers should have the ability to exclude themselves from specific types of markets if they choose. For example, a customer may feel they begin to lose control of their purchasing habits when they engage in prediction markets on hockey. The platform should allow the customer to exclude themselves from all hockey-related trading markets. The customer should not be able to re-engage on hockey-related markets until the exclusion time period expires.

The ability to easily access account information and set limits like this is commonplace in nearly all states that have legalized mobile gambling.¹⁴ NCPG urges the CFTC to include this in the upcoming rulemaking.

¹³ See *Supra*, FN 1 (p. 6 of <https://www.ncpgambling.org/wp-content/uploads/2024/01/Internet-Responsible-Gambling-Standards-Rev.-12-2023-FINAL.pdf>).

¹⁴ See *Supra* FN 3 at pg 7.



Time-Outs and Self-Exclusion

Customers should be able to select a time-out, also known as a cool-off period, and self-exclusion on the predictive market platform, similar to IRGS¹⁵'s standards. Time-outs are instant stops in all access to the platform and are typically available to last from 12 hours to six months. A longer stop in play is considered self-exclusion, discussed more below. A customer who chooses to take a time-out should be provided with resources to get help and the option to self-exclude. At the conclusion of the time-out period, access should not be automatically returned, but rather customers are given the opportunity to determine if they wish to renew the time-out or resume access to the platform.

Self-exclusion is a longer term, customer-initiated restriction on their ability to use the platform. Self-exclusion lengths should span from 6 months to a lifetime, with a customer having the ability to choose which time length they prefer. Self-exclusion should be irrevocable until the expiration date. Just like time-outs, the expiration of the self-exclusion period should not automatically return access to the platform to the customer, but rather give the customer the choice to either renew their self-exclusion period or allow access once again. It is best practice to not send notifications to the customer alerting them to this option when the self-exclusion period ends, but rather leave it to the customer to affirmatively attempt to access the platform and choose to resume access to the platform. Upon self-excluding, customers should immediately be provided resources to get help for a gambling problem, such as 1-800-MY-RESET, the number for the National Problem Gambling Helpline™, as well as its online chat feature: <https://www.ncpgambling.org/chat/>.

The CFTC should also create a way for platforms to share self-exclusion data among themselves for customers who have voluntarily agreed to it. If a customer self-excludes on one platform, they should be excluded on all platforms. Self-exclusion and time-outs are supported in nearly every state that has legalized mobile sports betting¹⁶. It can be a lifesaver to many who believe such activity is becoming harmful to them. NCPG urges the CFTC to include self-exclusion and time-outs in its future rulemaking.

Access to Help

One of the most straightforward yet most meaningful rules the CFTC should implement is the requirement that all prediction market platforms promote on the platform itself and in all advertising the National Problem Gambling Helpline™, 1-800-MY-RESET. On February 9th, 2026, in order to underscore this importance, the National Council on Problem Gambling's Board

¹⁵ See *Supra*, FN 1 (p. 7 of <https://www.ncpgambling.org/wp-content/uploads/2024/01/Internet-Responsible-Gambling-Standards-Rev.-12-2023-FINAL.pdf>).

¹⁶ See *Supra* FN 3 at pg 7.



of Directors passed a resolution calling on all prediction market platforms to promote the National Problem Gambling Helpline™.¹⁷ NCPG has operated the National Problem Gambling Helpline™ since 1985. Calls and texts to the number are routed to local resources, including local call centers, where trained specialists answer. The National Problem Gambling Helpline™ receives thousands of calls and texts each year and is available 24 hours a day, 7 days a week, 365 days a year in all 50 states.

NCPG has recently adopted 1-800-MY-RESET as the new National Problem Gambling Helpline™ number and brand to better appeal to all forms of gambling and gambling-like activities, including trading on prediction markets. This new number offers a neutral, non-stigmatizing, and user-defined point of access to get help when one’s relationship with gambling needs a reset. The number has both call and text functionality. We are currently working to create versions of the helpline branding that are especially applicable to prediction markets and not only traditional forms of gambling. We urge the CFTC to require 1-800-MY-RESET to be prominently displayed on all customer touchpoints for prediction market platforms, including in all advertising.

Advertising

The CFTC should implement rules that govern the advertisement of prediction market platforms, similar to the IRGS.¹⁸ Beyond the promotion of the National Problem Gambling Helpline™ (1-800-MY-RESET), the rules should include protections for vulnerable populations and the requirement of clear language around the risk involved with the activity and that participation is not a traditional investment.

Advertisements should not be permitted to be targeted to vulnerable populations, including underage individuals and those suffering from a gambling problem. The majority of states that have legalized sports betting prohibit marketing that is appealing to minors.¹⁹ In addition, the American Gaming Association’s Responsible Marketing Code for Sports Wagering (the “Code”) prohibits advertisements or other marketing that is designed to appeal primarily to those under 21 years old.²⁰ The Code lists several types of marketing that is prohibited; such as, using models, actors, influencers, athletes, or entertainers in advertising who are not 21 years of age. The Code also only permits placing sports wagering advertising in any stream (broadcast, cable, print, or digital) where at least 73.6% of the audience is expected to be 21 years of age or older.²¹ NCPG

¹⁷ Resolution available at: <https://www.ncpgambling.org/news/calling-prediction-market-operators-to-promote-helpline/>.

¹⁸ See *Supra*, FN 1 (p. 10 of <https://www.ncpgambling.org/wp-content/uploads/2024/01/Internet-Responsible-Gambling-Standards-Rev.-12-2023-FINAL.pdf>).

¹⁹ See *Supra* FN 3.

²⁰ Responsible Marketing Code for Sports Wagering available at: <https://americangaming.org/marketing-code/>.

²¹ *Id.*



believes aspects of the Code should inspire the CFTC’s rulemaking for prediction market platforms.

Many states and the Code also sharply limit advertising that may take place on college campuses. For example, New York sports betting regulations state, “Sports wagering shall not be promoted or advertised in college- or university-owned news assets (e.g., school newspapers, radio, telecasts) or advertised on college or university campuses.”²² The only exception being generally available advertisements that are not targeted to a specific area. Given that college students are often under the age of 21, they are especially susceptible to the risks associated with gambling or trading. NCPG recommends similar protections in the CFTC rulemaking for prediction markets.

Many states prohibit gambling advertising that targets those in recovery from a gambling problem. For example, Virginia regulations state that “A permit holder shall not intentionally use characteristics of at-risk or problem bettors to target potentially at-risk or problem bettors with advertisements.”²³ NCPG supports this and similar provisions and believes they should be included in CFTC rulemaking for prediction markets.

Another major area of advertising that must be addressed by CFTC rules is that marketing must be free of implications that trading is a solution to financial problems, or that it carries the same level of risk as traditional investing. According to recent data, 18% of Americans believe that event contracts offered on prediction markets are more similar to investing than gambling or financial forecasting.²⁴ This is extraordinarily troubling, as it downplays the risk involved in participating in prediction markets. Like traditional gambling, the payout of an event contract is uncertain, and the majority of individuals will lose more than they win. NCPG strongly advocates for gambling to be viewed as entertainment, not a way to make money, and that applies equally to prediction market participation. CFTC rules should address this misconception in advertising for prediction markets.

Age of Participation

Lastly, the CFTC should restrict participation in prediction markets to those 21 years of age or older. As noted above, research is clear that young people are at greater risk of gambling problems due to cognitive immaturities and poor understanding of statistical probabilities.²⁵ It is

²² N.Y. Code § 5329.37(e)(4). Advertising, marketing and promotions. Available at: <https://gaming.ny.gov/advertising-restrictions>.

²³ 11VAC5-80-150, available at: <https://law.lis.virginia.gov/admincode/title11/agency5/chapter80/section150/>.

²⁴ NCPG, National Survey Finds Widespread Gambling Participation Before Age 21 Amid Public Concern About Youth Exposure Risk, March 2, 2026, available at: <https://www.ncpgambling.org/news/survey-finds-widespread-gambling-participation-before-age-21/>.

²⁵ See *Supra* FN 5.



also evident that allowing participation at the age of 18 will flagrantly bring the activity into high schools and create the possibility that many will encourage their underage peers to participate through proxy trading or other technology methods. The vast majority of states understand this and have set the legal age to bet on sports at 21 years old. Setting the legal age to participate in the buying and selling of event contracts to be 21 years old is a commonsense rule that the CFTC should include. At a bare minimum, the CFTC should make it clear that platforms may limit the age of participants to those 21 years of age or older, beyond what is required by law or rule, without running afoul of CFTC rules.

V. Conclusion

Trading on prediction markets is functionally gambling and must include robust customer protections. Incorporating our suggestions into an upcoming rulemaking will significantly increase the prevention tools and safety net for those who would like to participate responsibly and for those who may be experiencing gambling problems. We urge the CFTC to take our recommendations seriously and to incorporate them into rules regarding event contract derivatives traded on prediction markets.

Sincerely,

A handwritten signature in black ink, appearing to read "CW", with a long horizontal stroke extending to the right.

Cole Wogoman
Director, Government Relations and League Partnerships
National Council on Problem Gambling

Also on behalf of the below state affiliates:

Arizona Council on Compulsive Gambling
Arkansas Problem Gambling Council
California Council on Problem Gambling
Indiana Council on Problem Gambling
Louisiana Association on Compulsive Gambling
Minnesota Alliance on Problem Gambling
Mississippi Council on Problem and Compulsive Gambling
New York Council on Problem Gambling
Oregon Council on Problem Gambling
Texas Coalition on Problem Gambling, Inc.
Virginia Council on Problem Gambling