

EXHIBIT A

**IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

DC GAMBLING RECOVERY LLC,
1001 N. West St. Ste. 1501
Wilmington, DE 19801

Plaintiff,

v.

AMERICAN WAGERING, INC.
dba CAESARS SPORTSBOOK
One Caesars Palace Drive
Las Vegas, NV 89109

BETFAIR INTERACTIVE US LLC
dba FANDUEL
6701 Center Drive West, Suite 1000
Los Angeles, CA 90045

BETMGM, LLC
Harborside Plaza 2
200 Hudson Street, Suite 700
Jersey City, NJ 07311

CROWN DC GAMING LLC
dba DRAFTKINGS
222 Berkeley St., 5th Fl.
Boston, MA 02116

FBG ENTERPRISES OPCO, LLC
dba FANATICS
95 Morton Street
New York, NY 10014

Defendants.

Case No. 2025-CAB-001265

COMPLAINT

On the eve of Problem Gambling Awareness Month, Plaintiff DC Gambling Recovery LLC brings this action against American Wagering, Inc. dba Caesars Sportsbook, Betfair

Interactive US LLC dba FanDuel, BetMGM, LLC, Crown DC Gaming LLC dba DraftKings, and FBG Enterprises Opco, LLC dba Fanatics (collectively, “Defendants”) for the recovery of gambling losses under D.C. Code § 16-1702 (the “Statute of Anne”).

INTRODUCTION

1. On January 31, 1925, the District of Columbia’s vice squad raided a then-popular Greek restaurant on 1217 E St., N.W. Officers arrested the owner, Louis Chipouras, and others for operating a furtive horse-race-betting operation.¹ But visit the block where that restaurant once stood, and today you will find the headquarters of the American Gaming Association – “the premier national trade group for the U.S. casino industry.”² And less than a mile away, at Caesars Sportsbook, D.C. residents and visitors now openly gamble on some of the same horse racing events that Chipouras once handicapped – as well as on football, basketball, and all manner of other sports, games, and athletic contests.

2. Between brick-and-mortar books (like Caesars Sportsbook) and their digital equivalents, D.C. gamblers now wager (and lose) tens of millions of dollars each month on sports gambling. And that number is rising quickly, reflecting an unprecedented public health crisis of gambling-related addiction, especially among some of the D.C.-area’s youngest and most vulnerable residents.

3. It didn’t use to be like this. Until roughly six years ago, sportsbooks did not operate legally within the District. Sports wagering in the District historically was not authorized.

¹ Ghosts of DC, *A Gambling Bust in 1925 Washington DC: From Dice to Drafts to the American Gaming Association* (Aug. 24, 2012), <https://perma.cc/67K7-K67J>.

² American Gaming Association, <https://www.americangaming.org/> (last visited Feb. 26, 2025).

4. Additionally, like several States, the District has long had a law protecting gamblers against large-stakes gambling losses: the Statute of Anne. Based on a 1710 British law passed during the reign of Queen Anne, that law makes certain gambling debts unenforceable. It allows a losing party to sue the winning party for the value of losses exceeding \$25 (and for fees). And, should the losing party fail to sue within three months, it authorizes anyone to bring a claim against the winning party for treble damages (with the recovery split evenly between the suing party and the District). The Statute of Anne has never been overturned (expressly or impliedly). It remains good law to this day.

5. Sports gambling companies rushed into the District in response to the Sports Wagering Lottery Amendment Act (“SWLAA”), a 2019 D.C. law purporting to legalize sports gambling. The D.C. Council enacted that law a year after the Supreme Court, in *New Jersey Thoroughbred Horsemen’s Association, Inc. v. NCAA*, 584 U.S. 453 (2018), held that a longstanding federal statute called the Professional and Amateur Sports Protection Act (“PASPA”), which had prohibited the States and U.S. territories (including the District) from legalizing sports gambling, violated the Tenth Amendment. The District apparently thought that the Supreme Court’s *New Jersey* decision meant that PASPA no longer applied to it. But that is wrong: the Tenth Amendment does not apply to the District of Columbia, so PASPA’s prohibition remains in full force in the District. The SWLAA is thus without any legal force or effect.

6. In any event, the SWLAA did not repeal the Statute of Anne. So even if the SWLAA were valid, it leaves in place the historical remedies that the District saw fit to prevent gambling operators like Defendants from fleecing users in D.C. of large amounts of money. By

preserving the Statute of Anne, the SWLAA legalized only *small-stakes betting* – claims that fall below the Statute of Anne’s \$25 threshold.

7. Defendants have operated in the District without regard to these legal limits – taking tens of millions of dollars from D.C.-based gamblers. But under the law, each time Defendants caused a gambler in the District to suffer gambling losses of at least \$25 in a single sitting, that person had the right to sue under the Statute of Anne within three months to recover for his or her losses, plus costs. And after three months has elapsed, *any* person may sue for three times the amount of each gambler’s unrecovered losses, receiving half as a relator’s fee, and sharing the other half with the District. In filing this action, Plaintiff takes just that step.

PARTIES

8. Plaintiff DC Gambling Recovery LLC is a company formed under the laws of the Delaware to enforce the District’s gambling laws. Its mailing address is 1032 15th St. N.W., #163, Washington, DC 20005. Plaintiff has no relationship to any gambler who has suffered gambling losses and has not colluded with any gamblers in bringing this action.

9. Defendant American Wagering, Inc. dba Caesars Sportsbook is a Nevada corporation based in Las Vegas, Nevada. It is authorized by the District of Columbia’s Office of Lottery and Gaming as a Class A Operator. It operates a sports wagering facility at Capital One Arena, 601 F St., N.W., Washington, D.C. 20004. It also offers a betting website and mobile app for use within the District.

10. Defendant Betfair Interactive US LLC dba FanDuel is a Delaware limited liability company based in Los Angeles, California. It is authorized by the District of Columbia’s Office of Lottery and Gaming as a Class A Operator. From 2022 until approximately February 20, 2025, it operated a sports wagering facility at Audi Field, 100 Potomac Ave., S.W., Washington, D.C. 20024. It also offers a betting website and mobile app for use within the District.

11. Defendant BetMGM, LLC is a Delaware limited liability company based in Jersey City, New Jersey. It is authorized by the District of Columbia's Office of Lottery and Gaming as a Class A Operator. It operates a sports wagering facility at Nationals Park, 1500 South Capitol St., S.E., Washington, D.C. 20003. It also offers a betting website and mobile app for use within the District.

12. Defendant Crown DC Gaming LLC dba DraftKings is a Delaware limited liability company based in Boston, Massachusetts. It is authorized by the District of Columbia's Office of Lottery and Gaming as a Class C Operator. It offers a betting website and mobile app for use within the District.

13. Defendant FBG Enterprises Opco, LLC dba Fanatics is a Delaware limited liability company based in New York, New York. It is authorized by the District of Columbia's Office of Lottery and Gaming as a Class C Operator. It offers a betting mobile app for use within the District.

14. Defendants are "winner[s]" at gaming within the meaning of the Statute of Anne, D.C. Code § 16-1702.

JURISDICTION AND VENUE

15. This case arises under D.C. Code § 16-1702.

16. This Court has jurisdiction over the subject matter of this case pursuant to D.C. Code § 11-921.

17. This Court has personal jurisdiction over the Defendants under D.C. Code § 13-423. Each of the Defendants has been licensed by the District to conduct sports wagering operations within the District and currently offers gambling services in-person and/or online to D.C. visitors and residents. In January 2025, the D.C. Office of Lottery and Gambling reported that American Wagering, Inc. made over \$513,000 in gross gaming revenue in D.C; Betfair

Interactive US LLC, over \$6 million; BetMGM, LLC, over \$470,000; Crown DC Gaming LLC nearly \$2 million; and FBG Enterprises Opco, LLC nearly \$300,000. Each of the Defendants thus transacts substantial business in the District, has purposefully directed its activities at District residents, and purposefully availed itself of benefits of the District's laws.

18. Plaintiff is a District resident and its claims against Defendants arise out of, relate to, and have a substantial connection with business purposefully transacted by Defendants in the District.

19. Venue is proper in the District of Columbia because, among other things, the conduct underlying Plaintiff's claims occurred in the District of Columbia.

FACTS

A. Sports gambling

20. Sports gambling can take many forms, but the basic concept is straightforward. Sportsbooks assign probabilities to the occurrence of various sporting-related events. For instance, they may set odds on the Chiefs winning next year's Superbowl, on Aaron Judge hitting two home runs in the third inning of a specific game, or on the Lakers and Warriors scoring a combined 250 points on a particular night. Based on those probabilities, the book will create bets for gamblers to wager on.

21. Sometimes, sportsbooks' offerings take the form of "money lines," which pay out based on the riskiness of the bet. For example, if you bet \$100 on a boxer as a +200 underdog, you would collect \$200 if that boxer won. Otherwise, the sportsbook would win your money and you would lose \$100. Conversely, if you bet \$100 on a boxer who was a -200 favorite, you would collect \$50 if that boxer won but would lose your \$100 to the sportsbook if the boxer lost. Other bets take the form of "spreads," whereby the sportsbook holds payouts constant by "handicapping" the competition. For example, if you bet \$100 on the Commanders as a +3.5

point favorite, you would get \$200 as long as the Commanders won by at least 4 points.

Otherwise, you would lose your money. Meanwhile, if you bet \$100 on the Ravens as a -3.5 underdog, you would get \$200 if the Ravens won *or* if they lost by less than 3 points.

Sportsbooks also offer more advanced forms of betting. For instance, they may offer “parlays,” which allow gamblers to chain together numerous bets, creating a single (riskier) bet with a higher potential payout if it hits.

22. Sportsbooks usually set their odds with help from professional statisticians and proprietary software. And while sportsbooks cannot typically change the terms of a bet a gambler has already placed, they can (and do) modify their offerings dynamically over time based on national and global betting trends. If, for example, significant money came in for White Abarrio to win the Kentucky Derby, the sportsbook would lower the payout for future bettors. This would incentivize bettors to place their money on other horses in the race. This gambit allows sportsbooks to derisk their operations.

23. Regardless of the specific type of bet offered, one fact remains constant: The sportsbook typically retains a statistical advantage (or “edge”) for itself. That is, absent some special inducement or promotional offer, the expected value of betting on both sides of a particular outcome will always be less than the amount wagered. This edge guarantees sportsbooks win over time and explains their \$13.71 billion in domestic profits in 2024 alone. Of course, that profit comes from somewhere. Over a long enough time horizon, the great majority of sports bettors lose money; one study determined that, after a year, only about 3% end up in the black. Everyone else ends up worse than before. And some individuals naturally predisposed to compulsive gambling suffer worst of all. In gambling, where there are winners there must also be losers. And individual sports gamblers are almost always losers.

B. The Statute of Anne

24. While the specific conduct animating this lawsuit is recent, the law at issue is not. The story begins in Britain during the twilight of the House of Stuart, when Queen Anne adopted what would become known as the Statute of Anne of 1710. That law had two main elements. The first declared a wide range of gambling transactions void (in effect, freeing the losing party from any obligation to pay the winner). The second created causes of action to claw back gambling gains. Those who lost at least “the Sum or Value of ten Pounds” could sue the winner to recover the amount they lost, along “with Co[s]ts of Suit.” And should the losing party fail to initiate that recovery suit within three months without just cause, any other person could bring a suit against the winning party for treble damages, with half going to the person bringing suit “the other Moiety to the u[s]e of the Poor of the Pari[s]h.” Resembling the modern *qui tam* action, this last provision deputized the public to serve as private Attorneys General, and offered a financial incentive to induce them to investigate and pursue claims against gamblers.

25. Not long after its adoption in Britain, the Statute of Anne crossed the Atlantic and seeded itself in the laws of many of Britain’s Colonies. That included Maryland. *See Mandeville v. Union Bank of Georgetown*, 13 U.S. (9 Cranch) 9, 10 (1815). And when the District separated from Maryland in 1801, it preserved (as a matter of custom) both the British common law and statutes that had been in force in Maryland at the time. *See Bank of Columbia v. Okely*, 17 U.S. (4 Wheat.) 235, 242 (1819). Congress would later codify that arrangement, requiring that the District follow both “[t]he common law, [and] all British statutes in force in Maryland on February 27, 1801.” Act of March 3, 1901, 31 Stat. 1189, D.C. Code 1951, 49-30. Because Maryland had the Statute of Anne in 1801, the District inherited it.

26. The District has always preserved that law. Indeed, when Congress revised the D.C. Code in 1963 to establish provisions relating to D.C.’s Judiciary and Judicial Procedure, it adopted a new version of the statute – changed slightly for modern times. *See* 77 Stat. 582, Pub. L. 88-241, § 1 (Dec. 23, 1963) (codified at D.C. Code §§ 16-1701, 16-1702). That statute has the same two elements. The first declares unlawful certain obligations created because of gambling. *See* D.C. Code § 16-1701. The second provides a tool for recovering sizeable losses: Any “person who, at any time or sitting,” bets on any game and “loses to a person so playing or betting, a sum of money, . . . amounting to \$25 or more” may “within three months . . . sue for and recover the money, . . . by a civil action, from the winner thereof, with costs.” *Id.* § 16-1702. If they do not, after three months, “any person may sue for, and recover treble the value of the money, . . . with costs of suit, by a civil action against the winner, one-half to the use of the plaintiff, the remainder to the use of the District of Columbia.” *Id.*

27. The Statute of Anne remains a valid law of the District – just as it has since the District’s earliest days.

C. Congress broadly prohibits sports gambling in the United States

28. On June 26, 1991, the U.S. Senate Subcommittee on Patents, Copyrights, and Trademarks investigated a recent “spread of legalized sports gambling” in certain parts of the United States. It found significant cause for concern. “Sports gambling,” Congress found, “threatens the integrity of, and public confidence in, amateur and professional sports.” S. Rep. 102-248, at 5 (1991). Worse, it threatens the wellbeing of the Nation’s youth. *Id.* Even at that time, new technology was opening gambling opportunities to younger and younger individuals. And “[y]oungsters inevitably would find sports gambling schemes that utilize these new technologies to be highly seductive.” *Id.* That was especially concerning because in 1991, “[o]f

the approximately 8 million compulsive gamblers in America, 1 million of them [were] under 20.” *Id.*

29. Congress decided to step in. In 1992, it passed the Professional and Amateur Sports Protection Act (“PASPA”) by an overwhelming bipartisan vote, and President George H.W. Bush signed it into law. 28 U.S.C. § 3701 *et seq.* As relevant here, that law made it “unlawful for” any “governmental entity to sponsor, operate, advertise, promote, license, or authorize by law or compact” any “lottery, sweepstakes, or other betting, gambling, or wagering scheme based, directly or indirectly (through the use of geographical references or otherwise), on one or more competitive games in which amateur or professional athletes participate, or are intended to participate, or on one or more performances of such athletes in such games.” *Id.* § 3702. For good measure, it made it similarly “unlawful for” any “person to sponsor, operate, advertise, or promote, pursuant to the law or compact of a governmental entity” the same. *Id.*

30. States hoping to profit off legalized sports betting fought back. New Jersey brought a constitutional challenge to PASPA under what has become known as the “anticommandeering doctrine.” Grounded in the Tenth Amendment’s preservation of state sovereignty, that doctrine prohibits Congress from directly instructing state legislatures as to what legislation they may (or, as here, may *not*) pass. This argument does not imply that Congress lacks the power to regulate sports gambling directly if it chooses to. Rather, it claims only that Congress may not regulate sports gambling *indirectly* by ordering that States decline to pass laws legalizing the practice.

31. Eventually, the Supreme Court accepted New Jersey’s anticommandeering challenge. In *New Jersey Thoroughbred Horsemen’s Association, Inc. v. NCAA*, it held that the

challenged PASPA provision – “prohibiting state authorization of sports gambling – violates the anticommandeering rule” because it “unequivocally dictates what a state legislature may and may not do.” 584 U.S. at 474. Under this approach “state legislatures are put under the direct control of Congress,” and “[i]t is as if federal officers were installed in state legislative chambers and were armed with the authority to stop legislators from voting on any offending proposals.” *Id.* Few things, the Court imagined, could present a “more direct affront to state sovereignty.” *Id.* And because Congress would not have meant only *some* of PASPA’s provisions in isolation to run against the States, the Court concluded that no aspect of PASPA restricts the ability of “each State . . . to act on its own” to regulate sports betting. *Id.* at 486.

32. *New Jersey* did not purport to discuss PASPA’s potential application to non-States, such as Washington, D.C. And that makes sense. Because “Congress has the entire control over the [D]istrict for every purpose of government,” the District cannot raise an anticommandeering claim against it. *Kendall v. United States ex rel. Stokes*, 37 U.S. (12 Pet.) 524, 619 (1838); *see, e.g., Burban v. City of Neptune Beach*, 920 F.3d 1274, 1283 (11th Cir. 2019); *DuBerry v. District of Columbia.*, 824 F.3d 1046, 1057 (D.C. Cir. 2016). So while the Supreme Court held that the anticommandeering doctrine prevented PASPA’s application to the States, the statute remained in force in those areas subject to direct federal control where the Tenth Amendment and state sovereignty do not limit Congress’s power to govern indirectly.

D. The District purports to legalize sports gambling

33. Following *New Jersey*, several U.S. jurisdictions raced to legalize sports gambling (to varying degrees). Concerned it would be left behind if it did not follow suit – and evidently ignoring that *New Jersey* did not free it from PASPA’s reach – the District eventually joined in. On May 3, 2019, D.C.’s Sports Wagering Lottery Amendment Act of 2018 (“SWLAA”) (D.C.

Act 22-594) took effect. In relevant part, it amended the D.C. Code so that the Code cannot be “construed to prohibit the operation of or participation in . . . sports wagering regulated, licensed, or operated by the Office of Lottery and Gaming.” D.C. Code § 22-1717. In other words, the District purported to remove what (under PASPA) was a firm prohibition on sports gambling.

34. Notably, the SWLAA did *not* purport to displace the Statute of Anne. Rather (setting aside the fact that PASPA prohibited the SWLAA’s passage) the acts fit together hand in glove. Under the SWLAA, sportsbooks could lawfully open in the District. But they would have to limit themselves to offering only low-stakes games. If they caused a gambler in the District to lose \$25 or more in a single sitting, that gambler could sue to get his or her money back via the Statute of Anne’s private right of action. And if he or she failed to do so within the three-month window, others could enforce the law in his or her stead; suing for treble damages and splitting the recovery with the District.

35. Defendants embraced this risk and rushed to set up shop within the District. In 2021, Caesars Sportsbook opened a brick-and-mortar location within Capital One Arena – the first betting venue housed within a professional sports facility in the Nation. The next year, FanDuel opened a venue at Audi Field, and BetMGM matched with one of its own at Nationals Park. In parallel, online sports gambling became available in various parts of the District. In person and online, District residents and visitors now use Defendants’ products to gamble millions each month on various sporting competitions.

36. The recent uptick in sports gambling has had dire public health consequences. In the years since *New Jersey*, nationwide searches for terms like “gambling addiction hotline” and “am I a gambling addict” have spiked by 23%. Much of the growth has been driven by young Americans. One survey found that “[n]early two-thirds of adolescents, ages 12 to 18, said they

had gambled or played gambling-like games in the previous year.”³ Another found that some 58% of 18- to 22-year-olds gamble on sports each year, with roughly 10% gambling on sports each week and 4% doing so daily.⁴ Sports gambling addictions begin as early as age 10, and studies have found that between 4% and 8% suffer from problem gambling.⁵ Those addictions can prove financially ruinous, with young students regularly losing tens, hundreds, or even thousands of dollars in a single day.⁶ Beyond that financial cost, the habit takes a severe emotional toll. Of problem gamblers who have sought out treatment, “between 22 and 81 percent . . . have been found to have suicidal ideations,” and “between 7 and 30 percent of individuals have had suicide attempts.”⁷

37. The District follows these concerning national patterns. The National Council on Problem Gambling “estimates 15,000 people with a gambling addiction may live in D.C.”⁸ That number has rocketed up over time. In 2022, the National Council received “4,892 calls from D.C. residents to its [gambling] helpline, a 35% increase over 2021.”⁹ And 2021 itself represented a “109% increase from the year before.”¹⁰ The D.C. Department of Behavioral Health has warned

³ Emily Sohn, *How gambling affects the brain and who is most vulnerable to addiction*, Am. Psychological Ass’n (July 1, 2023), <https://perma.cc/5UXM-H9W6>.

⁴ Opinion Diagnostics, *Sports Betting Activities Survey – April 2023 – Key Findings*, NCAA (Apr. 2023), <https://perma.cc/8Q95-TVG9>.

⁵ Mass. Dep’t of Health, *Let’s talk risk – A guide to discussing gambling with your child*, <https://www.mass.gov/doc/youth-risk-a-problem-gambling-toolkit/download>.

⁶ Opinion Diagnostics, *Sports Betting Activities Survey – April 2023 – Key Findings*, NCAA (Apr. 2023), <https://perma.cc/8Q95-TVG9>.

⁷ Virve Marionneau & Janne Nikkinen, *Gambling-related suicides and suicidality: A systematic review of qualitative evidence*, *Frontiers in Psychiatry* (Oct. 26, 2022), <https://perma.cc/6CAK-UGRN>.

⁸ Martin Austermuhle, *Sports Betting In D.C. Was Supposed To Fund Gambling Addiction Treatment. That Hasn’t Happened*, DCist (Mar. 30, 2023), <https://perma.cc/JXW6-FZF7>.

⁹ *Id.*

¹⁰ *Id.*

that “the District may be significantly underserving this population,” as it spends just “30 cents per capita” combatting gambling addictions, “below the national average of 40 cents.”¹¹

38. This lawsuit aims to allay some of those public health harms. The Statute of Anne entitles the District to half of any eventual recovery in this litigation. The District may well choose to use some of the sportsbooks’ ill-gotten gains to help clean up the mess those companies have made.

COUNT I
(Claim under D.C. Code § 16-1702)

39. Plaintiff brings this count against all Defendants under the Statute of Anne, D.C. Code § 16-1702.

40. Upon information and belief, since the passage of the SWLAA and continuing through the present, thousands of individuals within the District of Columbia have lost – and continue to lose – more than \$25 at any single time or sitting by playing at games of chance (*i.e.*, gambling) with Defendants, and have not sued to recover those losses within three months of payment to Defendants. Because D.C. law requires Defendants to keep detailed records regarding its users, their ages, and the amounts lost and won by those users, *see* D.C. Code § 36-621.07, the identity and precise number of such gamblers (“Gambling Victims”) is within the unique possession of Defendants.

41. Defendants are gambling “winner[s]” within the meaning of D.C. Code § 16-1702.

¹¹ *Id.*

42. Plaintiff qualifies as a “person” authorized to sue for the recovery losses at gaming within the meaning of D.C. Code § 16-1702. Plaintiff has not colluded with any Gambling Victims in bringing this action.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendant and respectfully requests that the Court grant the following relief:

- A. Declaring that the Defendants are liable under the Statute of Anne, D.C. Code § 16-1702;
- B. Awarding eligible damages, continuing until the time of final judgment, based on treble the value of the money, goods, chattels, or other things lost to Defendants at gambling, one-half to the use of the Plaintiff, the remainder to the use of the District of Columbia;
- C. Awarding the costs of prosecuting this action, including reasonable attorney’s fees, experts’ fees, and litigation costs together with interest;
- D. Awarding pre- and post-judgment interest as allowed by law; and
- E. Granting such other relief as the Court deems proper.

Dated: February 28, 2025

Respectfully submitted,

/s/ Derek T. Ho

Derek T. Ho (D.C. Bar No. 488609)
Eliana Margo Pfeffer (D.C. Bar No. 1723571)
Mark P. Hirschboeck (D.C. Bar No. 1618827)
Kyle B. Grigel (D.C. Bar No. 90031164)
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Counsel for Plaintiff

Superior Court of the District of Columbia

CIVIL DIVISION - CIVIL ACTIONS BRANCH

INFORMATION SHEET

2025-CAB-001265

DC GAMBLING RECOVERY LLC
 Plaintiff(s)
 vs

Case Number: _____
 Date: 2/28/2025

See Attachment A for names of Defendants
 Defendant(s)

One of the defendants is being sued
 in their official capacity.

Name: <i>(Please Print)</i> Derek T. Ho	Relationship to Lawsuit <input checked="" type="checkbox"/> Attorney for Plaintiff <input type="checkbox"/> Self (Pro Se) <input type="checkbox"/> Other: _____
Firm Name: KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.	
Telephone No.: DC Bar No.: (202) 326-7900 488609	

TYPE OF CASE: Non-Jury 6 Person Jury 12 Person Jury
 Demand: \$ _____ Other: Greater than \$10,000, in an amount to be determined at trial

PENDING CASE(S) RELATED TO THE ACTION BEING FILED
 Case No.: _____ Judge: _____ Calendar #: _____
 Case No.: _____ Judge: _____ Calendar #: _____

NATURE OF SUIT: <i>(Check One Box Only)</i>		
CONTRACT <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Breach of Warranty <input type="checkbox"/> Condo/Homeowner Assn. Fees <input type="checkbox"/> Contract Enforcement <input type="checkbox"/> Negotiable Instrument	COLLECTION/INS. SUB <input type="checkbox"/> Debt Collection <input type="checkbox"/> Insurance Subrogation <input type="checkbox"/> Motion/Application for Judgment by Confession <input type="checkbox"/> Motion/Application Regarding Arbitration Award	EMPLOYMENT DISPUTE <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Discrimination <input type="checkbox"/> Wage Claim <input type="checkbox"/> Whistle Blower <input type="checkbox"/> Wrongful Termination
REAL PROPERTY <input type="checkbox"/> Condo/Homeowner Assn. Foreclosure <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Drug Related Nuisance Abatement	<input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Interpleader	<input type="checkbox"/> Other <input type="checkbox"/> Quiet Title <input type="checkbox"/> Specific Performance
ADMINISTRATIVE PROCEEDINGS <input type="checkbox"/> Administrative Search Warrant <input type="checkbox"/> App. for Entry of Jgt. Defaulted Compensation Benefits <input type="checkbox"/> Enter Administrative Order as Judgment <input type="checkbox"/> Libel of Information <input type="checkbox"/> Master Meter <input type="checkbox"/> Petition Other	<input type="checkbox"/> Release Mechanics Lien <input type="checkbox"/> Request for Subpoena MALPRACTICE <input type="checkbox"/> Medical – Other <input type="checkbox"/> Wrongful Death <input type="checkbox"/> APPLICATION FOR INTERNATIONAL FOREIGN JUDGMENT	<input type="checkbox"/> FRIENDLY SUIT <input type="checkbox"/> HOUSING CODE REGULATIONS <input type="checkbox"/> QUI TAM <input type="checkbox"/> STRUCTURED SETTLEMENTS AGENCY APPEAL <input type="checkbox"/> Dangerous Animal Determination <input type="checkbox"/> DCPS Residency Appeal <input type="checkbox"/> Merit Personnel Act (OEA) <input type="checkbox"/> Merit Personnel Act (OHR) <input type="checkbox"/> Other Agency Appeal

Attachment A

Defendants

AMERICAN WAGERING, INC.
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One Caesars Palace Drive
Las Vegas, NV 89109

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1001 N. West St. Ste. 1501
Wilmington, DE 19801

Plaintiff,

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AMERICAN WAGERING, INC.
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Defendants.

Case No. 2025-CAB-001265

RULE 7.1 DISCLOSURE STATEMENT

Pursuant to D.C. Superior Court Civil Rule 7.1, Plaintiff DC Gambling Recovery LLC
hereby states as follows:

Plaintiff DC Gambling Recovery LLC has no parent entity, nor does any publicly held entity own 10% or more of its stock or other ownership interest.

Dated: February 28, 2025

Respectfully submitted,

/s/ Derek T. Ho

Derek T. Ho (D.C. Bar No. 488609)

Eliana Margo Pfeffer (D.C. Bar No. 1723571)

Mark P. Hirschboeck (D.C. Bar No. 1618827)

Kyle B. Grigel (D.C. Bar No. 90031164)

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK,
P.L.L.C.

1615 M Street, N.W., Suite 400

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Counsel for Plaintiff



Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

DC GAMBLING RECOVERY LLC

Plaintiff

vs.

Case Number 2025-CAB-001265

AMERICAN WAGERING, INC. dba CAESARS SPORTSBOOK

Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

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Derek T. Ho

Name of Plaintiff's Attorney

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

Address

1615 M Street, N.W., Suite 400 Washington, D.C. 20036

202-326-7900

Telephone

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Clerk of the Court



By

Deputy Clerk

March 3, 2025

Date

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**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL**

**Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov**

DC GAMBLING RECOVERY LLC

Demandante

contra

Número de Caso: _____

AMERICAN WAGERING, INC. dba CAESARS SPORTSBOOK

Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

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Derek T. Ho

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

Por: _____

Dirección

1615 M Street, N.W., Suite 400 Washington, D.C. 20036

Subsecretario

202-326-7900

Fecha _____

Teléfono

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Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

DC GAMBLING RECOVERY LLC

Plaintiff

vs.

Case Number 2025-CAB-001265

BETFAIR INTERACTIVE US dba FANDUEL

Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

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Derek T. Ho

Name of Plaintiff's Attorney

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

Address

1615 M Street, N.W., Suite 400 Washington, D.C. 20036

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Clerk of the Court



By _____

Deputy Clerk

March 3, 2025

Date _____

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**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL**

**Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov**

DC GAMBLING RECOVERY LLC

Demandante

contra

Número de Caso: _____

BETFAIR INTERACTIVE US dba FANDUEL

Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

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Derek T. Ho

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

Por: _____

Dirección

1615 M Street, N.W., Suite 400 Washington, D.C. 20036

Subsecretario

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Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

DC GAMBLING RECOVERY LLC

Plaintiff

vs.

Case Number 2025-CAB-001265

BETMGM, LLC

Defendant

SUMMONS

To the above named Defendant:

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Derek T. Ho

Name of Plaintiff's Attorney

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

Address

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Clerk of the Court



By

Deputy Clerk

March 3, 2025

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DIVISIÓN CIVIL

Sección de Acciones Civiles
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Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

DC GAMBLING RECOVERY LLC

Demandante

contra

Número de Caso: _____

BETMGM, LLC

Demandado

CITATORIO

Al susodicho Demandado:

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Derek T. Ho

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

Por: _____

Dirección

Subsecretario

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Superior Court of the District of Columbia
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Civil Actions Branch
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Telephone: (202) 879-1133 Website: www.dccourts.gov

DC GAMBLING RECOVERY LLC

Plaintiff

vs.

Case Number 2025-CAB-001265

CROWN DC GAMING LLC dba DRAFTKINGS INC.

Defendant

SUMMONS

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Derek T. Ho

Name of Plaintiff's Attorney

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

Address

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Clerk of the Court



By _____

Deputy Clerk

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DC GAMBLING RECOVERY LLC

Demandante

contra

Número de Caso: _____

CROWN DC GAMING LLC dba DRAFTKINGS INC.

Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

Derek T. Ho

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

Por:

Dirección

1615 M Street, N.W., Suite 400 Washington, D.C. 20036

Subsecretario

202-326-7900

Fecha

Teléfono

如需翻译,请打电话 (202) 879-4828

Veillez appeler au (202) 879-4828 pour une traduction

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IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedirayuda al respecto.

Vea al dorso el original en inglés
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Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

DC GAMBLING RECOVERY LLC

Plaintiff

vs.

Case Number 2025-CAB-001265

FBG ENTERPRISES OPCO, LLC dba FANATICS, INC

Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Derek T. Ho

Name of Plaintiff's Attorney

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

Address

1615 M Street, N.W., Suite 400 Washington, D.C. 20036

202-326-7900

Telephone

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법역을 원하시면, (202) 879-4828로 전화주세요

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Clerk of the Court



By

Deputy Clerk

March 3, 2025

Date

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation
Vea al dorso la traducción al español



**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL**

**Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov**

DC GAMBLING RECOVERY LLC

Demandante

contra

Número de Caso: _____

FBG ENTERPRISES OPCO, LLC dba FANATICS, INC

Demandado

CITATORIO

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Derek T. Ho

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