

IN THE SUPREME COURT OF FLORIDA

WEST FLAGLER ASSOCIATES, LTD.,
et al.,

Petitioners,

v.

SC2023-1333

RON D. DESANTIS, etc., et al.,

Respondents.

_____ /

**APPENDIX TO MOTION TO EXPEDITE CONSIDERATION OF
REQUEST FOR ALL WRITS RELIEF PENDING RESOLUTION OF
PETITION FOR WRIT OF QUO WARRANTO AND SUSPEND THE
SPORTS BETTING PROVISIONS CONTAINED IN
§§ 285.710(13)(B)(7) & 849.142, FLA. STAT.**

BUCHANAN INGERSOLL & ROONEY PC
2 S. Biscayne Blvd., Ste 1500
Miami, FL 33131
(305) 347-4080

Raquel A. Rodriguez, FBN 511439
raquel.rodriguez@bipc.com
Sammy Epelbaum, FBN 31524
sammy.epelbaum@bipc.com

-and-

-and-

401 E. Jackson St., Ste 2400
Tampa, FL 33602
(813) 222-8180

Hala Sandridge, FBN 454362
hala.sandridge@bipc.com
Chance Lyman, FBN 107526
chance.lyman@bipc.com

Attorneys for Petitioners

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Seminole Tribe of Florida to Debut Craps, Roulette and Sports Betting in December with Star-Studded Celebrations of a New Gaming Era

NEWS PROVIDED BY

Seminole Tribe of Florida →

01 Nov, 2023, 10:00 ET

HOLLYWOOD, Fla., Nov. 1, 2023 /PRNewswire/ -- The Seminole Tribe of Florida today announced plans to move forward with expanded casino games based on the Gaming Compact signed and approved by the Tribe and the State of Florida in 2021. On Wednesday, October 25, the U.S. Supreme Court rejected an attempt to block implementation of the Compact.

The Seminole Tribe and Seminole Hard Rock plan to celebrate "A New Era in Florida Gaming" with star-studded celebrations in December for the launch of craps, roulette and sports betting at all six Seminole Casinos.

"The Seminole Tribe thanks the State of Florida, the U.S. Department of the Interior and the U.S. Department of Justice for defending our Compact. By working together, the Tribe, the State and the federal government achieved a historic legal victory," said Marcellus Osceola Jr., Chairman of the Seminole Tribe of Florida.



Dice and Craps Table

"The Seminole Tribe of Florida's new initiative will create jobs, increase tourism, and provide billions in added revenue for our state," said Governor Ron DeSantis. "I was proud to work with the Tribe on our historic Gaming Compact and I look forward to its full implementation."

Craps, roulette and sports betting will launch to the public on Thursday, December 7 at all three Seminole Casinos in South Florida:

Seminole Hard Rock Hotel & Casino

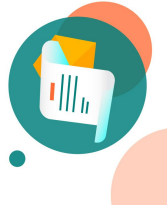
Hollywood, Seminole Classic Casino in Hollywood and Seminole Casino Coconut Creek. On Friday, December 8, the new games will launch at Seminole Hard Rock Hotel & Casino Tampa. On Monday, December 11, the new games will launch at Seminole Casino Hotel Immokalee, near Naples, and Seminole Brighton Casino, on the northwest side of Lake Okeechobee. More details on the exciting weekend of events will be announced soon.

"With the expansion of the new scope, we are creating over 1,000 new jobs made possible by the Compact," said Jim Allen, CEO of Seminole Gaming and Chairman of Hard Rock International. "This is a historic milestone that immediately puts Florida in the same league with the world's great gaming destinations."

About the Seminole Tribe of Florida and Seminole Gaming

Seminole Gaming manages six Florida casino complexes for the Seminole Tribe of Florida, including Seminole Hard Rock Hotels & Casinos in Tampa and Hollywood, Fla. Seminole Gaming has long been recognized for its industry innovations and success. The Seminole Tribe of Florida was the first Indian Tribe in North America to open an unlimited stakes bingo hall, which debuted in 1979 and became the forerunner of the Indian Gaming movement.

SOURCE Seminole Tribe of Florida



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Roulette Wheel and Roulette Table

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SunSentinel

Seminole Tribe re-launches mobile sports betting in Florida

Shira Moolten, South Florida Sun-Sentinel

Tue, Nov 7, 2023, 9:26 AM EST · 1 min read



The Seminole Tribe has launched its mobile sports betting app in a “limited” fashion, spokespeople said Tuesday, despite two ongoing lawsuits that challenge the practice.

“The Seminole Tribe is offering limited access to existing Florida customers to test its Hard Rock Bet platform,” Gary Bitner, a spokesperson for the tribe, said in a prepared statement. The statement did not elaborate on how many customers have access or what the limitations are.



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The re-launch comes a week after the tribe announced that in-person sports betting would return on Dec. 7 at all South Florida locations. At the time, the tribe did not comment on the return of mobile sports betting.

The Seminoles previously launched the sports betting app in 2021, but stopped accepting wagers after a court ruling blocked the deal.

Currently, two lawsuits filed by West Flagler and Associates seek to challenge mobile sports betting in Florida. One is before the U.S. Supreme Court, and argues that mobile sports betting defies the Indian Gaming Regulatory Act, even though the servers accepting the bets are located on Seminole Tribe land. The other is before the Florida Supreme Court, and argues that the law defies an amendment which requires a 60% of voters to approve any expansion of gambling in the state.

This is a developing story, so check back for updates. Click [here](#) to have breaking news alerts sent directly to your inbox.

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_____/

I, Isadore Havenick, hereby declare under penalty of perjury:

1. I am over 18 years of age, of sound mind and competent and capable to testify to the matters herein.

2. I submit this Declaration in support of the Motion to Expedite Consideration of Request for All Writs Relief Pending Resolution of Petition for Writ of Quo Warranto and Suspend the Sports Betting Provisions Contained in §§ 285.710(13)(b)(7) & 849.142, Fla. Stat. filed by Petitioners, West Flagler Associates, Ltd. (“West Flagler”), Bonita-Fort Myers Corporation d/b/a Springs Poker Room (“Bonita Springs”) and Isadore Havenick in the above-captioned action.

3. On Tuesday, November 7, 2023 at 9:40 a.m., I received from a friend, John Doe,¹ a screenshot of his successful deposit of \$50.00 into the Hard Rock Bet online sports betting platform, attached hereto as **Exhibit 1**.

4. The email confirmation John Doe received informs him that the funds he deposited are “now available immediately for betting.”

5. Later in the day, I received from John Doe screenshots of the home screen of the Hard Rock Bet mobile app announcing that online bets are available for those in “Early Access.” Attached as **Exhibit 2** is a true and correct copy of the screenshot of Hard Rock Bet mobile app home screen.

6. Also received from John Doe were screenshots of wagers he placed on the Hard Rock Bet online sports betting platform as well as a screenshot of winnings from a completed sporting event. Attached as **Exhibit 3** are true and correct copies of screenshots of John Doe’s wagers and winnings.

¹ To protect the privacy of my friend, I have named him John Doe and have redacted potential identifying information in the associated Exhibit.

Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true.

Executed this 7th day of November 2023, in the State of Florida.



ISADORE HAVENICK

EXHIBIT 1

9:52

5G

< Inbox

2 Messages

Congratulations on yo...



HB

Hard Rock Bet

9:38 AM

To: [REDACTED]

Congratulations on your deposit



Your deposit was a success

Hi [REDACTED],

Congratulations on your successful deposit. Funds are now available immediately for betting.

Amount: \$50.00

Transaction ID:

[REDACTED]

Bet Now

Please note that certain banks might charge additional fees. Check with your



EXHIBIT 2

EXHIBIT 3

9:39

2:59



Home



NHL



NBA



NFL



Tennis



MIL

-12.5
-110

U 228.5
-105

-700

Tomorrow, 8:00pm EST



LAL

-3.5
-115

O 220.5
-110

-165



HOU

+3.5
-105

U 220.5
-110

+135

Tomorrow, 8:00pm EST



MIA

+1.5
-115

O 221.5
-115

-105



Bet placed!

Heat

-105

TO WIN

Heat @ Grizzlies

Wager

\$20

Payout

\$39.05

ID:



Done

My Bets

Upcoming Live Finished

Heat

-105

TO WIN

Heat @ Grizzlies


📅 Tomorrow, 8:00pm EST

Wager

\$20

Payout

\$39.05

ID: [Redacted] 



Early cash out \$ 19.00



Home



Discover



My Bets

\$30

Account



Bet History

10/24/23 - 11/07/23 X

All Open Won Lost Void Cashed out

Heat**-105** Open

TO WIN

Heat @ Grizzlies

📅 Tomorrow, 8:00pm EST

Wager

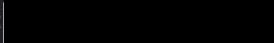
\$20

Payout

\$39.05

11/07/2023 at 9:39 AM

ID:



Home



Discover




My Bets

\$30

Account



 **Starts Soon**

 3 hours

Tennis Soccer Basketball Table Tennis Hockey

UEFA Champions League >

WINNER

Dortmund

+175

Newcastle

+145

 Tie

+230

 Today, 12:45pm EST



Bet placed!

Newcastle

+145

GAME RESULT

Dortmund vs Newcastle

Wager

\$10

Payout

\$24.50

ID:



Done

My Bets

Upcoming Live Finished

Newcastle

+145

GAME RESULT

Dortmund vs Newcastle

Today, 12:45pm EST

Wager

\$10

Payout

\$24.50

ID: [REDACTED]

 Early cash out \$ 9.50

Heat

-105

TO WIN

Heat @ Grizzlies

Tomorrow, 8:00pm EST

Wager

\$20

Payout

\$39.05

ID: [REDACTED]



Home



Discover



My Bets

\$20

Account

My Bets

Upcoming Live **Finished**

Kowalczyk, Marcin

-200 **Lost**

WINNER

Kowalczyk, Marcin vs. Buczynski, Witold

Wager

\$5

Paid

--

ID: [REDACTED]



Buczynski, Witold

+150

WINNER

Kowalczyk, Marcin vs. Buczynski, Witold

Wager

\$5

Paid

\$12.50

ID: [REDACTED]



[View full bet history in My Account](#)



Home



Discover



My Bets

\$10

Account

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 7, 2023, a true and accurate copy of the foregoing has been furnished via the E-Portal to: Ryan Newman, General Counsel, Executive Office of the Governor, 400 S. Monroe St., Tallahassee, FL 32399, ryan.newman@eog.myflorida.com, *counsel for Respondent Ron DeSantis, in his capacity as Governor of Florida*; David Axelman, General Counsel, Office of the General Counsel, Florida House of Representatives, 317 The Capitol, #402, Tallahassee, FL 32399, david.axelman@myfloridahouse.gov, *counsel for the Respondent Paul Renner, in his capacity as Speaker of the Florida House of Representatives*; Carols Rey, General Counsel, Florida Senate, 302 The Capitol, 404 S. Monroe St., Tallahassee, FL 32399, rey.carlos@flsenate.gov, *counsel for Kathleen Passimodo, in her capacity as President of the Senate*; Ashley Moody, Attorney General, Office of the Attorney General, PL-01 The Capitol, Tallahassee, FL 32399, oag.civil.eserve@myfloridalegal.com; Henry C. Whitaker, Solicitor General, Jeffrey Paul DeSousa, Chief Deputy Solicitor General, Christopher J. Baum, Senior Deputy Solicitor General, Office of the Attorney General, The Capitol, PL-01 Tallahassee,

Florida 32399 (850) 414-3300

christopher.baum@myfloridalegal.com, *counsel for Respondents*; and

Todd K. Norman and Olivia R. Share, Nelson Mullins, 390 N. Orange Ave., Suite 1400, Orlando, Florida 32801, (407) 839-4200,

todd.norman@nelsonmullins.com, olivia.share@nelsonmullins.com,

Counsel for Amicus Curiae, No Casinos, Inc.

By: /s/ Raquel A. Rodriguez

Raquel A. Rodriguez, FBN 511439

raquel.rodriguez@bipc.com