

	No.	
DAWN NETTLES, et al.	§	IN THE DISTRICT COURT OF
<i>Plaintiff</i>	§	
	§	
VS.	§	HARRIS COUNTY, TEXAS
	§	
ROOK TX LP, GARY N. GRIEF,	§	
IGT SOLUTIONS CORPORATION	§	
and LOTTERY.COM	§	
<i>Defendant</i>	§	_____JUDICIAL DISTRICT

PLAINTIFFS' CLASS ACTION PETITION

TO THE HONORABLE JUDGE OF THIS COURT:

COME NOW, Plaintiffs, as proposed class representatives, including Dawn Nettles and similarly situated Texas lottery players, bring this class action proceeding against Defendants ROOK TX LP, GARY GRIEF, IGT SOLUTIONS CORPORATION and LOTTERY.COM, INC. , and allege as follows:

I. NATURE OF THIS CASE

1. This is a class action filed on behalf of Texas lottery players who have been defrauded by an extensive scheme orchestrated by the Texas Lottery Commission, its former Director Gary Grief, and IGT Solutions Corporation, along with its executives and affiliated entities Rook TX LP and Lottery.com. The Defendants engaged in systematic fraud, misappropriating lottery funds, illegally selling tickets across state lines, and manipulating the outcome of lottery games, including but not limited to the April 22, 2023, Lotto Texas drawing.
2. The Plaintiffs seek recovery of funds fraudulently obtained by the Texas Lottery Commission, as well as declaratory and injunctive relief to prevent further misconduct.

II. DISCOVERY PLAN

3. Pursuant to TEX. R. CIV. P. 190.4, Plaintiffs intend to conduct discovery under a Level 3 Discovery Plan.

III. PARTIES

(A) A. Plaintiffs

4. Plaintiffs are Texas residents who purchased lottery tickets and have suffered financial harm due to the Defendants' fraudulent actions.

(B) B. Defendants

5. Defendant GARY N. GRIEF is a Texas resident, and the former Executive Director of the Texas Lottery who resides in Texas and may be served at his home address of 10833 ALBERO CV, AUSTIN, TX 78739.
6. Defendant ROOK TX LP is a Delaware entity that has engaged in business in Texas, specifically to launder stolen lottery funds from the State of Texas. Defendant ROOK TX LP does not and it has failed to appoint a registered agent in Texas and has no designated agent on whom service of citation may be made in this action. The causes of action asserted arose from and are connected with purposeful acts committed by the Defendant ROOK TX LP as more fully described below. Accordingly, Defendant ROOK TX LP may be cited by serving the Secretary of State of Texas via personal delivery at Service of Process, Secretary of State, James E. Rudder Building, 1019 Brazos, Room 105, Austin, Texas 78701 provided that the citation and petition are forwarded to the Defendant's registered

agent PHS Corporate Services, Inc. at the registered address of: 1313 N. Market St., Ste. 5100, Wilmington, DE 19801.

7. Defendant IGT SOLUTIONS CORPORATION is a Delaware entity used to launder stolen lottery funds and may be served through its registered agent, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3136 USA.
8. Lottery.com, Inc. is a Delaware entity that has engaged in business in Texas, specifically to launder stolen lottery funds from the State of Texas. Defendant Lottery.com does not and it has failed to appoint a registered agent in Texas and has no designated agent on whom service of citation may be made in this action. The causes of action asserted arose from and are connected with purposeful acts committed by the Defendant Lottery.com as more fully described below. Accordingly, Defendant Lottery.com may be cited by serving the Secretary of State of Texas via personal delivery at Service of Process, Secretary of State, James E. Rudder Building, 1019 Brazos, Room 105, Austin, Texas 78701 provided that the citation and petition are forwarded to the Defendant's registered agent The Corporation Trust Company, Corporation Trust Center, 1209 Orange St. Wilmington, Delaware, 19801.

IV. JURISDICTION AND VENUE

9. This Court has jurisdiction over the claims because the amount in controversy exceeds the minimum jurisdictional limits of the Court.
10. Venue is proper in Harris County because the events giving rise to this lawsuit occurred in Texas, and the Defendants conduct business in Harris County, Texas.

V. CLASS ACTION ALLEGATIONS

11. Plaintiffs bring this action on behalf of themselves and all similarly situated Texas lottery players who purchased tickets in reliance on fair play but were defrauded by the Defendants' unlawful conduct.
12. Plaintiffs seek certification of a class pursuant to Rule 42 of the Texas Rules of Civil Procedure, consisting of all Texas consumers who purchased Texas Lottery tickets and suffered financial harm due to Defendants' deceptive practices.
13. The Proposed Class is so numerous that joinder of all members is impracticable, as the Texas Lottery has thousands of participants statewide.
14. Common questions of law and fact predominate, including whether Defendants:
 - Engaged in illegal lottery ticket sales;
 - Allowed fraudulent redemptions;
 - Manipulated Texas Lottery rules to benefit Lottery.com and its executives;
 - Misappropriated lottery funds.
15. Plaintiffs' claims are typical of the claims of the Proposed Class, as all members have been affected by the same fraudulent scheme.
16. A class action is superior to individual lawsuits in ensuring a fair and efficient resolution of these claims.

VI. FACTUAL BACKGROUND

17. The Texas Lottery Commission, under the leadership of Gary Grief, facilitated a long-running fraud scheme in collaboration with Lottery.com and its executives.
18. Defendants illegally printed and sold Texas lottery tickets across state and international lines, violating state and federal laws.
19. Defendants manipulated the Texas Lottery system to ensure a fraudulent win in the April 22, 2023, Lotto Texas drawing, allowing a criminal organization to claim a \$57.7 million prize under the anonymous entity ROOK TX LP.

VII. CAUSES OF ACTION

20. COUNT I – VIOLATION OF THE TEXAS DECEPTIVE TRADE PRACTICES ACT (DTPA) Defendants engaged in false, misleading, and deceptive acts under Tex. Bus. & Com. Code § 17.46(b). Additionally, Defendants engaged in unconscionable actions or courses of action, as defined in Tex. Bus. & Com. Code § 17.45(5), by knowingly taking advantage of consumers' lack of knowledge and understanding of the Texas Lottery system. Defendants misrepresented the fairness and legitimacy of Texas Lottery operations while secretly engaging in rigged outcomes, fraudulent redemptions, and illicit lottery sales, which exploited the trust of ordinary Texas lottery players. Defendants' conduct was knowing and intentional, and as a result, Plaintiffs are entitled to additional treble damages pursuant to Tex. Bus. & Com. Code § 17.50(b)(1), as well as attorneys' fees and costs.
21. COUNT II – COMMON LAW FRAUD Defendants made material misrepresentations and omissions, inducing Plaintiffs and class members to purchase fraudulent Texas Lottery tickets.

22. COUNT III – CONSPIRACY TO DEFRAUD Defendants knowingly and willfully conspired to deceive Texas Lottery players and manipulate the lottery system for financial gain.
23. COUNT IV – MONEY HAD AND RECEIVED Defendants have in their possession funds that rightfully belong to Plaintiffs and the Class, obtained through fraudulent means.
24. COUNT V – NEGLIGENCE AND GROSS NEGLIGENCE Defendants failed in their duty to conduct and regulate the lottery fairly, causing substantial harm to Plaintiffs and the Class.
25. COUNT VI – BREACH OF CONTRACT Defendants’ failure to operate a fair lottery constitutes a material breach of contractual obligations owed to Plaintiffs and Class members.
26. COUNT VII – UNJUST ENRICHMENT Defendants profited from their fraudulent conduct at the expense of Plaintiffs and the Class, and equity demands that they return the funds wrongfully obtained.
27. COUNT VIII – EXEMPLARY DAMAGES Plaintiffs seek exemplary damages under Tex. Civ. Prac. & Rem. Code § 41.003(a) for Defendants’ gross negligence, fraud, malice, and conscious disregard of Plaintiffs’ rights.
28. COUNT IX – DECLARATORY JUDGMENT Pursuant to Texas Uniform Declaratory Judgments Act, Tex. Civ. Prac. & Rem. Code § 37.001 et seq.) Plaintiffs seek a declaratory judgment pursuant to Texas Civil Practice and Remedies Code § 37.001 et seq., to resolve an actual and justiciable controversy between Plaintiffs and Defendants regarding the fairness, legality, and enforceability of Defendants’ lottery-related activities. Defendants have engaged in fraudulent, deceptive, and misleading conduct by manipulating lottery

outcomes, misappropriating lottery funds, and engaging in unlawful ticket sales. Plaintiffs contend that such actions violate the Texas Lottery Act, the Texas Deceptive Trade Practices Act (DTPA), and other applicable laws. Defendants, however, dispute liability and claim that their conduct is lawful. Plaintiffs seek a declaration from the Court that:

- a) Defendants' fraudulent and deceptive acts, including rigged lottery results and unlawful ticket sales, violate Texas law;
- b) Defendants' representations regarding fair play and legitimate lottery operations constitute false, misleading, and deceptive practices;
- c) Defendants must cease and desist from further engaging in deceptive lottery practices;
- d) Any contractual or financial obligations imposed on Plaintiffs and Class Members due to fraudulent or deceptive conduct are void and unenforceable and must be refunded.

VIII. DAMAGES

29. Plaintiffs and the Class seek:

- Actual economic damages under DTPA § 17.50.
- Treble damages due to Defendants' knowing and intentional misconduct.
- Injunctive relief to prevent further deceptive practices.
- Attorneys' fees, prejudgment and post-judgment interest.

IX. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for relief and judgment against Defendants as follows: Certify this lawsuit as a class action.

- Declaratory and injunctive relief;
- Award economic and treble damages under the DTPA.
- Order Defendants to disgorge unlawfully obtained funds or provide restitution
- Grant injunctive relief to prevent future fraud.
- Actual and punitive damages;
- Pre- and post-judgment interest;
- Award attorneys' fees and litigation costs.

Grant any further relief deemed just and proper.

JURY DEMAND

Plaintiffs demand a trial by jury on all issues triable as of right.

Respectfully submitted,

MANFRED STERNBERG & ASSOCIATES, P.C.



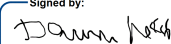
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DECLARATION IN LIEU OF VERIFICATION (JURAT)

“My name is Dawn Nettles, my date of birth is 11/21/50, and my address is 5202 Brcelona Dr, Garland TX 75043, Dallas County, Texas, United States of America. I declare under penalty of perjury that every statement in the foregoing Plaintiff’s Original Petition is within my personal knowledge and is true and correct.

Executed in Harris County, State of Texas on the 14 day of February 2025.

Signed by:

FP2ACEPTAB9F004F5...

Dawn Nettles , Declarant