

25-BC03A-0007

CAUSE NO. \_\_\_\_\_

JERRY B. REED.	§	IN THE BUSINESS COURT
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	THIRD BUSINESS COURT
	§	DIVISION
	§	
ROOK TX, LP, et al.	§	
	§	
<i>Defendants.</i>	§	TRAVIS COUNTY, TEXAS

**NOTICE OF REMOVAL TO BUSINESS COURT**

Defendants Rook TX LP and Rook GP LLC (collectively “Defendants”) submit this Notice of Removal pursuant to Texas Rule of Civil Procedure 355 and hereby remove this action to the Third Business Court Division of the Business Court of Texas:

**I. JURISDICTION**

Plaintiff Jerry B. Reed won the May 17, 2023 Texas lottery jackpot. Unhappy with his \$7.5 million windfall, he filed this lawsuit and complained that he wanted more. He alleges that Defendants engaged in a “game rigging scheme” in connection with the April 22, 2023 Texas lottery drawing. Pet. ¶¶ 1, 22, 49. Plaintiff alleges that Rook TX LP and its general partner Defendant Rook GP LLC were fraudulently “formed as vehicles to hide the identity of the company and individuals who received the proceeds of the illegal game rigging scheme.” Pet. ¶ 38. Specifically, he asserts that Rook GP LLC misrepresented the creation date of Rook TX LP to claim the April 22, 2023 prize, thus calling the entity’s governing documents into question. Pet. ¶¶ 40-41. Accordingly, the business court has authority and jurisdiction over this case because it is an action regarding the governance and governing documents of an organization and the amount in controversy exceeds \$5 million. TEX. GOV’T CODE § 25A.004(b)(2); TEX. R. CIV. P. 355(b)(2)(A).

**A. Original jurisdiction arises under Section 25A.004(b)(2) because this action concerns Rook TX LP's formation and governing documents.**

The business court has original jurisdiction over actions in which the amount of controversy exceeds \$5 million, in the action “regarding the governance, governing documents, or internal affairs of an organization.” TEX. GOV'T CODE § 25A.004(b)(2). This action concerns the formation and governing documents of Rook TX LP and Rook GP LLC. *Id.* The amount in controversy exceeds \$5 million because Plaintiff filed this action complaining that his May 2023 lottery prize “should have been \$95 million larger” and pleads damages of “at least \$95 million.” Pet. ¶¶ 1, 50; TEX. GOV'T CODE § 25A.004(b).

Plaintiff's Original Petition (“Petition”) asserts claims against Rook TX LP and Rook GP LLC for (1) money had and received, (2) conspiracy, (3) aiding and abetting, (4) assisting and participating, (5) concert of action, and (6) negligence per se based on violations of the Texas Government Code.<sup>1</sup> The source of Defendants' alleged wrongdoing is that when presenting the winning ticket, Rook TX LP and Rook GP LLC misrepresented Rook TX LP's formation date. Pet. ¶¶ 40-41. Plaintiff pleads that by misrepresenting Rook TX LP's creation date, Defendants violated Government Code Section 466.308 by claiming a lottery prize by fraud “and/or by aiding or agreeing to aid other Defendants to claim a lottery prize . . . by fraud.” Pet. ¶ 41. Defendants' alleged violation of Section 466.308 and related statutes form the basis of Plaintiff's claim for negligence per se. Pet. ¶¶ 55-59 (Count VI).

The disposition of Plaintiff's claim for negligence per se hinges on the formation of Rook TX LP and Rook GP LLC. To determine whether Defendants violated Section 466.308, the Court

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<sup>1</sup> Plaintiff filed his Second Amended Petition on April 21, 2025. *See* Appendix, Exhibit 9. It has not served the First Amended Petition or Second Amended Petition on Rook TX LP or Rook GP LLC. However, Defendants file this Notice of Removal based on the Original Petition, because Defendants first discovered the “facts establishing the business court's jurisdiction over the action” upon its receipt of the same. TEX. GOV'T CODE § 25A.006(f)(1); TEX. R. CIV. P. 355 (c)(2)(A).

will need to consider the partnership's governing documents. Pet. ¶ 41.<sup>2</sup> The Court may also have to inquire into the internal affairs<sup>3</sup> of both entities in considering whether Rook TX LP and Rook GP LLC, and its officers, "made a false representation" regarding its formation Pet. ¶ 40. Therefore, under Subsection (b)(2) the business court has original jurisdiction over Plaintiff's claim for negligence per se and supplemental jurisdiction over all remaining claims. TEX. GOV'T CODE §§ 25A.004(b)(2); 25A.004(f).

**B. The business court has original and supplemental jurisdiction over all claims because each cause of action implicates Rook TX LP and Rook GP LLC's governance as part of the same purported "game rigging scheme."**

Subsection (b)(2) also confers original jurisdiction over all remaining claims because Plaintiff's allegations that Rook TX LP and Rook GP LLC were formed as the "vehicle" to facilitate and conceal an alleged "illegal game rigging scheme" are the foundation of each cause of action such that every claim necessarily implicates "the governance, governing documents, or internal affairs of" these entities. *Id.* § 25A.004(b)(2). Plaintiff's bevy of claims such as aiding and abetting turn on the formation of Rook TX LP and Rook GP LLC as fraudulent "vehicles." Pet. ¶ 38. As with negligence per se, disposition of these claims will require investigation of the formation of the Rook entities, which will include—at minimum—a consideration of their governance and governing documents. TEX. GOV'T CODE § 25A.004(b)(2).

Jurisdiction is also proper in the business court because Rook TX LP and Rook GP LLC's formation implicates Chapter 152 and Chapter 153 of the Texas Business Organization Code, which govern general partnerships and limited partnerships, respectively, including their creation.

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<sup>2</sup> The formation documents were provided to the Texas Lottery Commission for review before Rook TX LP presented the winning lottery ticket for payment. This gave the commission the opportunity to scrutinize and question the documents before it paid out on the winning ticket.

<sup>3</sup> "Internal affairs" references "(a) the rights, power, and duties of an organization's governing persons, officers, owners, and members; and (b) matters relating to the organization's membership and ownership interests." TEX. GOV'T CODE § 25A.001(7).

TEX. BUS. ORGS. CODE §§ 152.052, 153.003; *Primexx Energy Opportunity Fund, LP v. Primexx Energy Corp.*, No. 24-BC01B-0010, 2025 WL 758641, at \*10 (Tex. Bus. Ct. Mar. 10, 2025), reconsideration denied, No. 24-BC01B-0010, 2025 WL 1125042 (Tex. Bus. Ct. Apr. 15, 2025) (“TBOC Chapter 153 governs limited partnerships. However, Ch. 152’s general partnership laws and other rules of law and equity compatible with Ch. 153 also apply to limited partnerships.”). Because Plaintiff’s allegations also arise out of or involve the Business Organizations Code, jurisdiction over this entire action is also appropriate pursuant to Section 25A.004(b)(7). TEX. GOV’T CODE § 25A.004(b)(7) (providing original jurisdiction over “an action arising out of the Business Organizations Code.”).

Nevertheless, this Court otherwise has supplemental jurisdiction over all remaining claims because each claim against Rook TX LP and Rook GP LLC relate to their internal affairs and form “part of the same case or controversy.” TEX. GOV’T CODE § 25A.004(f) (providing “supplemental jurisdiction over any other claim related to a case or controversy within the court’s jurisdiction that forms part of the same case or controversy.”). Plaintiff alleges that all defendants participated in the same controversy—or “game rigging scheme”—concerning the April 22, 2023 draw and that Rook TX LP and Rook GP LLC conspired in this endeavor. Pet. ¶¶ 22, 41. Accordingly, this Court has supplemental jurisdiction over Plaintiff’s claims for money had and received, conspiracy, aiding and abetting, assisting and participating, and concert of action because they all relate to Rook TX LP and Rook GP LLC’s formation to advance the same purportedly illegal “scheme.” TEX. GOV’T CODE § 25A.004(f).

## II. VENUE

Venue is proper in the Third Business Court Division. TEX. R. CIV. P. 355(b)(2)(B). The Third Division includes Travis County, Texas. TEX. GOV’T CODE §§ 25A.003(e), 74.042(d). Venue

is proper in the Third Division because the 353<sup>rd</sup> Judicial District Court of Travis County, Texas previously had jurisdiction over this case based on Plaintiff's allegations that Travis County is the county of Defendants residence and/or principal office under Section 15.002 of the Texas Civil Practice and Remedies Code. TEX. GOV'T CODE § 25A.006(a); Pet. ¶ 18.

### **III. TIMELINESS**

This Notice of Removal is timely because it was filed within 30 days of when Rook TX LP and Rook GP LLC "discovered, or reasonably should have discovered, facts establishing the business court's jurisdiction over the action." TEX. GOV'T CODE § 25A.006(f)(1); TEX. R. CIV. P. 355(c)(2)(A). Plaintiff's counsel sent Rook TX LP and Rook GP LLC's counsel a courtesy copy of the Petition on April 10, 2025.<sup>4</sup> Plaintiff served Defendants with the Petition on April 19, 2025. Removal is therefore timely because Defendants file this Notice of Removal within 30 days of when Rook TX LP and Rook GP LLC learned of the facts establishing the business court's jurisdiction in the Petition. *See* TEX. GOV'T CODE § 25A.006(f)(1); TEX. R. CIV. P. 355(c)(2)(A). Not all parties agree to this removal. TEX. R. CIV. P. 355(b)(1).

Pursuant to Rule 355, attached to this Notice of Removal as Exhibit 1 through 15, is a copy of the 353<sup>rd</sup> District Court's docket sheet, and all process, pleadings, and orders in this action. TEX. R. CIV. P. 355(b)(3).<sup>5</sup> As of the date of this filing, there are no current settings and no requests for relief pending in this action beyond Plaintiff's live petition.

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<sup>4</sup> Rook TX LP and Rook GP LLC do not concede that their removal deadline should be measured from when they received a courtesy copy of the petition.

<sup>5</sup> *See* Appendix.

#### **IV. CONCLUSION**

For the reasons stated above, Defendants Rook TX LP and Rook GP LLC hereby remove this action from the 353<sup>rd</sup> Judicial District Court of Travis County, Texas to the Third Business Court Division.

Respectfully submitted,

**TROUTMAN PEPPER LOCKE LLP**

By: /s/ David E. Harrell, Jr.

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**ATTORNEYS FOR DEFENDANTS**

**ROOK TX LP AND ROOK GP LLC**

#### **CERTIFICATE OF SERVICE**

I hereby certify that I served a true and correct copy of the foregoing instrument on opposing counsel on May 9, 2025, as follows:

***By electronic service***

/s/ David E. Harrell, Jr.

David E. Harrell, Jr.

CAUSE NO. \_\_\_\_\_

JERRY B. REED.

*Plaintiff,*

v.

ROOK TX, LP, et al.

*Defendants.*

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IN THE BUSINESS COURT

THIRD BUSINESS COURT  
DIVISION

TRAVIS COUNTY, TEXAS

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**APPENDIX**

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# **Exhibit 1**

353rd District Court

Case Summary

Case No. D-1-GN-25-002446

JERRY REED VS. ROOK TX LP,ROOK GP,  
LLC,LOTTERY.COM, INC,AUTOLOTTO, INC,LOTTERY  
NOW, INC §  
§  
§

Location: 353rd District Court  
Judicial Officer: 353RD, DISTRICT COURT  
Filed on: 04/08/2025

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Case Information

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Case Type: Other Civil  
Case Status: 04/08/2025 Open

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Assignment Information

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**Current Case Assignment**

Case Number D-1-GN-25-002446  
Court 353rd District Court  
Date Assigned 04/08/2025  
Judicial Officer 353RD, DISTRICT COURT

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Party Information

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**Plaintiff REED, JERRY B**

**Lagarde, Richard L**  
**Retained**

**Defendant ALTX MANAGEMENT, LLC**

**AUTOLOTTO, INC**

**CLEMENSON, MATTHEW**

**COLOSSUS BETS LIMITED**

**DICKINSON, RYAN**

**DIMATTEO, LAWRENCE ANTHONY III**

**LOTTERY NOW, INC**

**LOTTERY.COM, INC**

**MARANTELLI, BERNARD**

**QAWI AND QUDDUS, INC**

**RANOGAJEC, ZELJKO**

**ROOK GP, LLC**

**ROOK TX LP**

**WHITE SWAN DATA LIMITED**

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Case Events

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04/08/2025 OTHER/NOTICE  
CIVIL CASE INFORMATION SHEET

04/08/2025 ORIGINAL PETITION/APPLICATION (OCA)  
PLAINTIFF'S ORIGINAL PETITION

Case Summary

Case No. D-1-GN-25-002446

Party: Plaintiff REED, JERRY B

04/10/2025 OTHER/NOTICE  
*PROCESS REQUEST FORM - REQUEST FOR ISSUANCE OF CITATION*

04/10/2025 OTHER/NOTICE  
*PROCESS REQUEST FORM - REQUEST FOR ISSUANCE OF CITATION*

04/10/2025 OTHER/NOTICE  
*PROCESS REQUEST FORM - REQUEST FOR ISSUANCE OF CITATION*

04/17/2025 EXECUTED SERVICE  
*EXECUTED SERVICE OF CITATION- LAWRENCE ANTHONY DIMATTEO III*

04/18/2025 PLEADING  
*PLAINTIFF'S FIRST AMENDED PETITION*  
Party: Plaintiff REED, JERRY B

04/21/2025 PLEADING  
*PLAINTIFF'S SECOND AMENDED PETITION*  
Party: Plaintiff REED, JERRY B

04/23/2025 OTHER/NOTICE  
*PROCESS REQUEST FORM - REQUEST FOR ISSUANCE OF CITATION*

04/29/2025 EXECUTED SERVICE  
*EXECUTED CITATION LOTTERY NOW INC*

04/30/2025 OTHER/NOTICE  
*PROCESS REQUEST FORM - REQUEST FOR ISSUANCE OF CITATION*

05/02/2025 OTHER/NOTICE  
*PROCESS REQUEST FORM*

05/06/2025 OTHER/NOTICE  
*PROCESS REQUEST FORM - REQUEST FOR ISSUANCE OF CITATION*

05/07/2025 OTHER/NOTICE  
*PROCESS REQUEST FORM*

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Service Events

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04/14/2025 **Citation**  
ROOK GP, LLC  
Unserved  
COLOSSUS BETS LIMITED  
Unserved  
DIMATTEO, LAWRENCE ANTHONY III  
Served: 04/17/2025

04/14/2025 **Citation**  
LOTTERY.COM, INC  
Unserved  
AUTOLOTTO, INC  
Unserved  
LOTTERY NOW, INC  
Served: 04/23/2025  
CLEMENSON, MATTHEW  
Unserved  
DICKINSON, RYAN  
Unserved

04/14/2025 **Citation**  
ALTX MANAGEMENT, LLC  
Unserved  
QAWI AND QUDDUS, INC  
Unserved

353rd District Court

Case Summary

Case No. D-1-GN-25-002446

04/14/2025	<b>Citation</b> ROOK GP, LLC Unserved
04/25/2025	<b>Citation</b> MARANTELLI, BERNARD Unserved RANOGAJEC, ZELJKO Unserved WHITE SWAN DATA LIMITED Unserved
05/02/2025	<b>Citation</b> QAWI AND QUDDUS, INC Unserved
05/08/2025	<b>Citation</b> DICKINSON, RYAN Unserved
05/08/2025	<b>Citation</b> MARANTELLI, BERNARD Unserved

# **Exhibit 2**

# CIVIL CASE INFORMATION SHEET

## D-1-GN-25-002446

353RD, DISTRICT COURT

CAUSE NUMBER (FOR CLERK USE ONLY):

COURT (FOR CLERK USE ONLY):

4/8/2025 9:56 AM  
Velva L. Price  
District Clerk  
Travis County  
D-1-GN-25-002446  
Rosa Oneal

STYLED JERRY B. REED v. ROOK TX LP, et al

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

1. Contact information for person completing case information sheet:		Names of parties in case:		Person or entity completing sheet is:	
Name:  RICHARD LAGARDE	Email:  richard@lagardelaw.com	Plaintiff(s)/Petitioner(s):  JERRY B. REED	Defendant(s)/Respondent(s):  SEE ATTACHED	<input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____	
Address:  230 WESTCOTT ST., SUITE 100	Telephone:  713-993-0660	Additional Parties in Child Support Case:  Custodial Parent: _____  Non-Custodial Parent: _____  Presumed Father: _____		[Attach additional page as necessary to list all parties]	
City/State/Zip:  HOUSTON, TX 77007	Fax:  _____	Signature: State Bar No: 713-993-0660			
2. Indicate case type, or identify the most important issue in the case (select only 1):					
Civil			Family Law		
<b>Contract</b> <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____ <b>Foreclosure</b> <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____	<b>Injury or Damage</b> <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <b>Malpractice</b> <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <b>Product Liability</b> <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____ <input checked="" type="checkbox"/> Other Injury or Damage: _____	<b>Real Property</b> <input type="checkbox"/> Eminent Domain/ Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____ <b>Related to Criminal Matters</b> <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus— Pre-indictment <input type="checkbox"/> Other: _____	<b>Marriage Relationship</b> <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <b>Divorce</b> <input type="checkbox"/> With Children <input type="checkbox"/> No Children <b>Other Family Law</b> <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	<b>Post-judgment Actions (non-Title IV-D)</b> <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other <b>Title IV-D</b> <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order <b>Parent-Child Relationship</b> <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____	
<b>Employment</b> <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____	<b>Other Civil</b> <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____				
<b>Tax</b> <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax	<b>Probate &amp; Mental Health</b> <b>Probate/Wills/Intestate Administration</b> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____				
3. Indicate procedure or remedy, if applicable (may select more than 1):					
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action		<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment		<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover	
4. Indicate damages sought (do not select if it is a family law case):					
<input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input checked="" type="checkbox"/> Over \$1,000,000					

**List of Defendants for Reed vs. Rook et al**

ROOK TX LP,  
ROOK GP, LLC,  
COLOSSUS BETS LIMITED,  
LOTTERY.COM, INC.,  
AUTOLOTTO, INC.,  
LOTTERY NOW, INC.,  
ALTX MANAGEMENT, LLC,  
QAWI AND QUDDUS, INC.,  
LAWRENCE ANTHONY "TONY" DIMATTEO III,  
MATTHEW CLEMENSON, and  
RYAN DICKINSON

### **Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Mary LaGarde on behalf of Richard LaGarde

Bar No. 11819550

mary@lagardelaw.com

Envelope ID: 99395135

Filing Code Description: OTHER

Filing Description: CIVIL CASE INFORMATION SHEET

Status as of 4/8/2025 4:54 PM CST

#### **Case Contacts**

<b>Name</b>	<b>BarNumber</b>	<b>Email</b>	<b>TimestampSubmitted</b>	<b>Status</b>
Manfred Sternberg		manfred@msternberg.com	4/8/2025 9:56:52 AM	NOT SENT
Richard LaGarde		richard@lagardelaw.com	4/8/2025 9:56:52 AM	NOT SENT
Mary EllisLaGarde		mary@lagardelaw.com	4/8/2025 9:56:52 AM	NOT SENT
Jeffrey DaleAdams		jeff@jeffadamslaw.com	4/8/2025 9:56:52 AM	NOT SENT



# **Exhibit 3**

D-1-GN-25-002446  
NO. \_\_\_\_\_

**JERRY B. REED** § **IN THE DISTRICT COURT OF**  
*Plaintiff* §  
**VS.** § **TRAVIS COUNTY, TEXAS**  
**ROOK TX, LP et al.** § 353RD, DISTRICT COURT  
*Defendants* § \_\_\_\_\_ **JUDICIAL DISTRICT**

**PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW, Plaintiff, JERRY B. REED and brings this action against Defendants ROOK TX LP, ROOK GP, LLC, COLOSSUS BETS LIMITED, LOTTERY.COM, INC., AUTOLOTTO, INC., LOTTERY NOW, INC., ALTX MANAGEMENT, LLC, QAWI AND QUDDUS, INC., LAWRENCE ANTHONY "TONY" DIMATTEO III, MATTHEW CLEMENSON, and RYAN DICKINSON and alleges as follows:

**A. NATURE OF THIS CASE**

1. This action is filed on behalf of Jerry Reed, a Texas lottery player who won the Lotto Texas jackpot on May 17, 2023. Recent Texas Senate hearings revealed that the May 17th jackpot, won by Plaintiff, should have been \$95 million larger. This discrepancy is attributed to an illegal game-rigging and money-laundering scheme perpetrated by Defendants during the earlier Lotto Texas drawing on April 22, 2023.

2. Plaintiff seeks recovery of funds fraudulently and illegally obtained by Defendants and which rightfully should have been included in the Lotto Texas jackpot he won on May 17, 2023.

*Plaintiff's Original Petition*

## B. DISCOVERY- CONTROL PLAN

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

## C. RELIEF

4. Plaintiff seeks monetary relief over \$1,000,000.

## D. PARTIES

5. Plaintiff JERRY B. REED is a resident of Hood County Texas.

6. Defendant ROOK TX LP is a limited partnership organized and existing under the laws of Delaware. Defendant engaged in business in Texas, but does not maintain a regular place of business in Texas or a designated agent for service of process. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by 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 ROOK GP LLC is a limited liability company organized and existing under the laws of Delaware. Defendant engaged in business in Texas, but does not maintain a regular place of business in Texas or a designated agent for service of process. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful

Page 2

*Plaintiff's Original Petition*

acts committed by Defendant ROOK GP LLC as more fully described below. Accordingly, Defendant ROOK GP LLC 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.

8. Defendant COLOSSUS BETS LIMITED, a limited liability company formed and existing under the laws of the United Kingdom, whose home office is located at 21 Lombard Street, London, EC3V 9AH, may be served through the Hague Service Convention or by other means directed by the court, provided they are not prohibited by the UK's law or international agreements. Defendant engaged in business in Texas but has not designated or maintained a resident agent for service of process in Texas. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant as more fully described below.

9. Defendant LOTTERY.COM, INC., is an entity organized and existing under the laws of Delaware. Defendant engaged in business in Texas, but does not maintain a regular place of business in Texas or a designated agent for service of process. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant as more fully described below. Accordingly, Defendant Lottery.com, Inc. 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

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*Plaintiff's Original Petition*

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.

10. Defendant AUTOLOTTO, INC. is a Delaware entity that has engaged in business in Texas. Defendant may be served with process through its registered agent, C T Corporation System Address 1999 Bryan St., Ste. 900 Dallas, TX 75201-3136.

11. Defendant LOTTERY NOW, INC. is a Delaware entity that has engaged in business in Texas. Defendant may be served with process through its registered agent, Paracorp Incorporated, 14001 W Hwy 29 Suite 102, Liberty Hill, TX 78642.

12. Defendant ALTX MANAGEMENT, LLC, a Texas entity whose registered office is located in Denton County Texas, may be served with process by serving its registered agent for service of process, Nur Ali, in Denton County at 2225 Veranda Avenue, Trophy Club, TX 76262.

13. Defendant QAWI AND QUDDUS, INC., D/B/A LUCK ZONE, a Texas entity whose registered office is in Travis County Texas, may be served with process by serving its registered agent for service of process, Nizar Ali, in Travis County at 15408 Prestancia Drive, Austin, TX 78717.

14. Defendant LAWRENCE ANTHONY "TONY" DIMATTEO III, an individual, may be served with process at Defendant's home address in Travis County at 5104 Alonso Drive, Austin, TX 78738.

15. Defendant MATTHEW CLEMENSON, an individual who is a nonresident of Texas, whose home is located at 1115 Union Street, San Francisco, CA 94109, may be served with

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*Plaintiff's Original Petition*

process by serving the Texas Secretary of State at 1019 Brazos Street, Austin, Texas 78701, as Defendant's agent for service because Defendant engaged in business in Texas but has not designated or maintained a resident agent for service of process in Texas. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant as more fully described below.

16. Defendant RYAN DICKINSON, an individual, may be served with process at Defendant's home address in Travis County at 5617 Lipan Apache Bend, Austin, TX 78738.

#### E. JURISDICTION

17. This Court has jurisdiction over the claims because the amount in controversy exceeds the minimum jurisdictional limits of the Court.

#### F. VENUE

18. Venue is proper in Travis County under Texas Civil Practice and Remedies Code section 15.002 because Defendants Lawrence Anthony DiMatteo III and Ryan Dickinson are residents of Travis County and Defendants AltX Management, LLC, and Qawi and Quddus, Inc., d/b/a Luck Zone maintain their principal offices in Texas in Travis County.

#### G. FACTUAL BACKGROUND

19. At least as far back as 2020, the three founders of Lottery.com, Defendants LAWRENCE ANTHONY "TONY" DIMATTEO III ("Dimatteo"), MATTHEW CLEMENSON ("Clemenson"), and RYAN DICKINSON ("Dickinson") explored the possibility of rigging a state

lottery by purchasing every possible number combination. They found that opportunity in Texas in April of 2023.

20. Following a seven-month period without a winner, the Lotto Texas jackpot ballooned to \$95 million for the drawing on April 22, 2023, the game's largest in over 12 years. The odds of winning a Lotto Texas jackpot are 1 in 25,827,165.

21. A consortium of foreign and domestic companies and individuals, collaborating with Dimatteo, Clemenson, and Dickinson, devised a scheme to purchase nearly all 25.8 million possible number combinations, effectively rigging the April 22, 2023, Lotto Texas game. This operation stands as one of the most significant lottery rigging cases in U.S. history.

22. The game rigging scheme was ostensibly designed to guarantee that the conspirators would win the \$95 million lottery prize. The true object was likely more sinister. As Texas State Senator Paul Bettencourt declared in a recent hearing, “This is a 99% probability of money laundering.” The Chairman of the Texas Lottery Commission (“TLC”), Robert Rivera, agreed that “[i]t does sound like money laundering.” TLC Commissioner Clark E. Smith likewise stated, “[i]t seems to me to be an indication of money laundering....I can see it being a strong indication of money laundering”.

23. Defendant Colossus Bets Limited (“Colossus Bets”), a London-based betting company, specializes in group purchasing arrangements for gamblers. It organizes syndicates of individuals and organizations, pools their funds, and places substantial wagers in exchange for a commission fee.

24. Colossus Bets funded the Defendants' game rigging scheme in April of 2023. The group purchase arrangement used by Colossus Bets was illegal and in violation of Texas Gov't Code §466.3054 which prohibits establishing or promoting a group purchase or pooling arrangement under which lottery tickets are purchased on behalf of the group or pool and any prize is divided among the members of the group or pool, and the person intentionally or knowingly: (1) uses any part of the funds solicited or accepted for a purpose other than purchasing tickets on behalf of the group or pool; or (2) retains a share of any prize awarded as compensation for establishing or promoting the group purchase or pooling arrangement. A violation of § 466.3054 is a third-degree felony in Texas.

25. Defendants Colossus Bets, Lottery.com, Dimatteo, Clemenson, and Dickinson enlisted four licensed lottery ticket retailers in Texas to execute the proposed illegal group purchase. In exchange for printing lottery tickets covering the 25.8 million possible number combinations, these retailers were promised a percentage of the price paid for each ticket. The participating ticket retailers included Spicewood retailer Autolotto, Inc. doing business as Lottery.com ("Autolotto"), Waco retailer AltX Management, LLC ("AltX"), Round Rock retailer Qawi and Quddus, Inc., doing business as Luck Zone ("Luck Zone"), and Colleyville retailer Lottery Now, Inc. ("Lottery Now") (hereinafter referred to collectively as the "Ticket Retailers").

26. Defendants faced significant challenges, as they had only 72 hours between Lotto Texas drawings to purchase lottery tickets representing all the possible 25.8 million number combinations. This task was essentially impossible under normal circumstances due to the limitations of the Texas Lottery terminals used for playing Lotto Texas.

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27. The Texas Lottery terminals allow customers to purchase tickets through only three methods:

- Paper Slips: Customers fill out a slip with a pencil, marking up to 5 ticket combinations per slip. The slip is then scanned, and a corresponding ticket is printed.
- Touch Screen Input: Customers manually enter their desired combinations using a touch screen and either their finger or a stylus.
- Texas Lottery Mobile App: Customers can enter up to 10 combinations of numbers and generate a QR code on the official Texas Lottery app. This QR code must be presented to a Texas Lottery retailer, who uses a barcode scanner to process a maximum of 10 number combinations per QR code.

28. Each of these methods is time-consuming and imposes significant constraints, making it impractical to achieve the volume of tickets needed within the given timeframe.

29. Defendants overcame this challenge through an ingenious method. They used custom-designed software, loaded onto smartphones, to generate a system of counterfeit QR codes that tricked the state-approved Texas Lottery terminals into recognizing the codes as if they had been generated by the Texas Lottery Commission's authorized mobile app. These counterfeit QR codes were designed to allow all 25.8 million Lotto Texas number combinations to be entered into the terminals. By wirelessly scanning these specially created counterfeit QR codes into the Lotto Texas terminals, Defendants were able to print nearly 2.58 million tickets in less than 72 hours

with each ticket containing 10 number combinations. This method enabled Defendants to guarantee a win of the \$95 million jackpot.

30. Defendants violated Texas law by using counterfeit QR codes. According to 16 Tex. Admin. Code § 401.304, plays for draw games may be entered using various approved methods, including QR codes. However, QR codes must be generated through the Texas Lottery Mobile Application, as officially approved by the lottery commission. Under Texas law, tickets created using custom-designed QR code-generating software—an unapproved selection method—are deemed invalid and void.

31. Defendants also violated Texas law by wirelessly connecting smartphones loaded with custom-designed QR code-generating software to Texas Lottery terminals through the terminals' barcode scanning devices. According to 16 Tex. Admin. Code § 401.304, "no hardware or software shall be connected to a Texas Lottery terminal, either directly or wirelessly, without the permission of the Texas Lottery Commission." Defendants did not obtain permission to wirelessly connect their custom-designed software to Texas Lottery terminals. Furthermore, the only QR code-generating software approved by the Texas Lottery Commission is the official Texas Lottery mobile app. Consequently, the use of Defendants' custom-designed QR code-generating software was unlawful. As a result, both the winning ticket and all other tickets printed through this scheme were invalid on their face, as they contravened established rules.

32. To process millions of tickets within the 72-hour window between Lotto Texas draws, the Ticket Retailers were required to rapidly and significantly scale up their operations. Since lottery tickets can only be purchased and printed on state-issued lottery terminals, this posed

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a considerable logistical challenge. Most retailers typically operate with just one or two of these machines, making such a large-scale operation impossible.

33. The Ticket Retailers addressed this issue by submitting emergency requests for additional lottery terminals and sufficient paper stock to print 2.58 million tickets.

34. Records indicate that an outlet affiliated with Lottery.com and operated by Autolotto, Inc. had not sold tickets for several months. However, on April 19, 2023, the day sales began for the April 22 Lotto Texas draw, the company submitted an urgent request to the Texas Lottery Commission for 10 additional terminals.

35. On the same day, a Waco retailer affiliated with Lottery.com and operated by AltX Management LLC, also placed a rush order. It had sold almost no tickets in recent months but requested 5 additional terminals on an emergency basis.

36. Meanwhile, a third retailer in Colleyville, operated by Lottery Now, Inc., experienced a sudden increase in activity. Earlier that year, the store near Fort Worth had operated with only a single lottery terminal. As the April 22nd jackpot game drew closer, the retailer requested 12 additional terminals from the Texas Lottery Commission.

37. Only one ticket matched all the winning numbers in the Match 6 game of the April 22, 2023, Lotto Texas drawing: 3, 5, 18, 29, 30, and 52. The winning \$95 million ticket was one of the tickets generated through Defendants' illegal game rigging scheme.

38. On June 14, 2023, Colossus Bets, or agents acting on behalf of Colossus Bets, formed Rook GP LLC, a limited liability Delaware company. On June 15, 2023, Colossus Bets, or agents acting on behalf of Colossus Bets, formed Rook TX LP, a Delaware limited partnership

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*Plaintiff's Original Petition*

company. Both Rook GP LLC and Rook TX LP were formed as vehicles to hide the identity of the company and individuals who received the proceeds of the illegal game rigging scheme.

39. On June 27, 2023, New Jersey attorney Glenn Gelband presented the winning \$95 million ticket to Texas Lottery authorities. Gelband endorsed the ticket as “Glenn Gelband, solely in his capacity as the Managing Member of Rook GP LLC, a Delaware limited liability company, which is the General Partner of Rook TX LP, a Delaware limited partnership, on behalf of Rook TX LP.”

40. On the same day, Gelband, acting on behalf of Rook GP LLC, filled out and signed a Texas Lottery Winner Claim Form designed for use by entities claiming prizes of \$1 million or more. On the form, Gelband identified the winning entity as Rook TX LP and represented that the entity was created on “03/01/2023” which would have been seven weeks before the April 22<sup>nd</sup> Lotto Texas draw. This was a false representation by both Rook GP LLC and Rook TX LP. Rook TX LP was, in fact, created on June 15, 2023, more than seven weeks after the April 22<sup>nd</sup> Lotto Texas draw. In addition, Gelband represented that Rook TX LP received the ticket on April 21, 2023, which was a false representation because Rook TX LP did not even exist at that time.

41. By misrepresenting the creation date of the entity claiming the \$95 million jackpot and the date that entity received the ticket, Defendants violated Texas Gov’t Code § 466.308 by intentionally or knowingly claiming a lottery prize or share of a prize by means of fraud, deceit, or misrepresentation and/or by aiding or agreeing to aid other Defendants to claim a lottery prize or a share of a lottery prize by means of fraud, deceit, or misrepresentation. Violation of § 466.308 is a second-degree felony.

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42. Rook TX LP rejected the annuity option under which the \$95 million jackpot would have been paid out over 30 years in annual installments. Instead, Rook TX LP opted for a reduced one-time lump sum cash payment of \$57,804,374.

43. Defendants' illegal group purchase scheme resulted in Rook TX LP cashing in the following tickets:

Match 6	1 ticket at \$95,000,000	\$57,804,374 (lump sum)
Match 5	288 tickets at \$2,015 each	\$580,320
Match 4	16,925 tickets at \$50 each	\$846,250
Match 3	377,360 tickets at \$3 each	<u>\$1,033,086</u>
Total Won		\$60,264,030

44. By rigging the game to guarantee Defendants a win, all the Defendants violated Texas Gov't Code §466.307 which prohibits a person from intentionally or knowingly influencing or attempting to influence the selection of the winner of a lottery game. A violation of §466.307 is a second-degree felony.

45. The Ticket Retailers likewise violated Texas Government Code § 466.305, which prohibits the sale of lottery tickets on credit. Unlike standard lottery transactions, the Ticket Retailers did not collect payment for the tickets at the time of their printing. Instead, the Ticket Retailers extended credit to Colossus Bets, postponing the collection of \$25.8 million from Colossus Bets until after the Lotto Texas drawing was completed and the jackpot had already been won. A violation of § 466.305 is a Class C misdemeanor.

46. Between April 22, 2023, and May 17, 2023, no winning Lotto Texas tickets were sold.

47. Plaintiff Jerry Reed, like millions of other Texans, regularly played Lotto Texas using the same combination of numbers that he and his wife, Melissa, had used for many years.

48. On May 17th, Jerry Reed used that same combination of numbers and finally won the Lotto Texas jackpot, which had been reduced to \$7.5 million following the \$95 million payout on April 22nd. Tragically, Jerry's wife Melissa did not live long enough to see their years of dedication to the lottery rewarded.

49. Had the Defendants not engaged in their illegal money laundering and game-rigging scheme connected to the April 22nd draw, the \$95 million jackpot would have rolled over, as there were no other winners. Consequently, Jerry Reed's May 17th jackpot win would have been \$102.5 million instead of \$7.5 million.

#### H. COUNT I – MONEY HAD AND RECEIVED

50. Defendants hold money that, in good conscience, belongs to Plaintiff. By illegally rigging the game to win the \$95 million jackpot on March 22, 2023, Defendants reduced the size of the Lotto Texas jackpot won by Plaintiff on May 17, 2023, and therefore deprived Plaintiff of that money. Plaintiff seeks liquidated damages in the amount of at least \$95 million.

## I. COUNT II – CONSPIRACY

51. Each of the Defendants, in combination with one another, agreed to engage in an illegal bulk purchase of Lotto Texas tickets to rig the game in their favor and to launder illicit funds. Defendants employed unlawful means, as outlined above, to accomplish their goals. Defendants intended to rig the April 22, 2023, Lotto Texas draw, depriving other players of prize money in that game and subsequent ones. To accomplish the object of their agreement, Defendants engaged in the unlawful overt acts outlined above. The agreement by Defendants to illegally rig the April 22<sup>nd</sup> game caused injury to Plaintiff. Defendants are jointly and severally liable for the financial injury suffered by Plaintiff as a direct and proximate result of Defendants' conspiracy.

## J. COUNT III – AIDING AND ABETTING

52. Each of the Defendants knew that the conduct outlined above was illegal. With the intent to assist one another accomplish the bulk purchase of lottery tickets through unlawful means, each of the Defendants assisted and/or encouraged one another to accomplish their unlawful methods and goal. Defendants' assistance and encouragement was a substantial factor causing harm to Plaintiff. Defendants are jointly and severally liable for the financial injury suffered by Plaintiff as a direct and proximate result of their assistance and encouragement of the unlawful methods used to accomplish a bulk purchase of lottery tickets.

#### K. COUNT IV -- ASSISTING & PARTICIPATING

53. Each of the Defendants substantially assisted one another in causing the unlawful actions used to accomplish the illegal bulk purchase of lottery tickets. Each of the Defendant's assistance and participation, separate from one another's acts, breached duties owed to the lottery players of the State of Texas, including Plaintiff. Defendants' assistance & participation was a substantial factor in causing the unlawful methods used to accomplish a bulk purchase of lottery tickets. Defendants are jointly and severally liable for the financial injury suffered by Plaintiff as a direct and proximate result of Defendants' assistance & participation.

#### L. COUNT V -- CONCERT OF ACTION

54. Each of the Defendants agreed with one another to engage in the unlawful acts outlined above. Defendants agreed to engage in these unlawful acts to rig the Lotto Texas game in their favor, which was highly antisocial and likely to cause harm to the integrity and reputation of the Texas Lottery and harm to the millions of lottery players who relied upon the honesty and fairness of the Texas Lottery. Each of the Defendants' acts were intentional. Defendants' acts in carrying out the agreement caused harm to Plaintiff. Defendants are jointly and severally liable for the financial injury suffered by Plaintiff as a direct and proximate result of Defendants' concert of action.



#### M. COUNT VI – NEGLIGENCE PER SE

55. Defendants violated Texas Government Code §§ 466.155, 466.3054, 466.305, 466.307, and 466.308 as well as 16 Tex. Admin. Code §401.304. These statutes and administrative regulations aim to ensure fairness and integrity in Texas lottery games and to prevent cheating. They are designed to protect Texas lottery players like Plaintiff against the type of injury he suffered.

56. These statutes and administrative regulations are of the type that impose tort liability.

57. Defendants' violation of these statutes and administrative regulations was without legal excuse.

58. Defendants' breach of the duty imposed by these statutes and administrative regulations proximately caused injury to Plaintiff, which resulted in a \$95 million reduction in the Lotto Texas jackpot Plaintiff won on May 17, 2023.

59. Plaintiff seeks damages within the jurisdictional limits of this Court.

#### N. COUNT VII – EXEMPLARY DAMAGES

60. Plaintiff's injury resulted from Defendants' fraudulent and malicious use of unlawful means to accomplish their goal of rigging the Lotto Texas game in their favor and of laundering money, which actions entitle Plaintiff to exemplary damages under Texas Civ. Prac. & Rem. Code § 41.003(a).

#### O. REQUEST FOR DISCLOSURE

61. Under Texas Rule of Civil Procedure 194, Plaintiff requests that Defendants disclose, within 50 days of the service of this request, the information or material described in Rule 194.2.

#### P. PRAYER FOR RELIEF

62. For these reasons, Plaintiff asks that the Court issue citation for Defendants to appear and answer, and that Plaintiff be awarded a judgment against Defendants for the following:

- a. Actual damages.
- b. Exemplary damages.
- c. Prejudgment and postjudgment interest.
- d. Attorney's fees and Court costs.
- e. All other relief to which Plaintiff is entitled.

#### Q. JURY DEMAND

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

Respectfully submitted,

LAGARDE LAW FIRM, P.C.



Richard LaGarde  
State Bar No. 11819550  
Mary LaGarde  
State Bar No. 24037645  
230 Westcott St., Suite 100  
Houston, TX 77007  
TEL: (713) 993-0660  
richard@lagardelaw.com  
mary@lagardelaw.com  
ATTORNEYS FOR PLAINTIFF

MANFRED STERNBERG & ASSOCIATES,  
P.C.

/s/ Manfred Sternberg  
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1700 Post Oak Blvd.  
2 BLVD Place Suite 610  
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TEL: (713) 622-4300  
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manfred@msternberg.com  
CO-COUNSEL FOR PLAINTIFF

THE LAW OFFICE OF JEFF ADAMS, PLLC

/s/ Jeff Adams  
Jeff Adams  
State Bar No. 24006736  
119 Logansport Street  
Center, TX 75935  
Tel: (936) 598-4900  
jeff@jeffadamslaw.com  
CO-COUNSEL FOR PLAINTIFF

Page 18

*Plaintiff's Original Petition*

Page 29

### **Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Mary LaGarde on behalf of Richard LaGarde

Bar No. 11819550

mary@lagardelaw.com

Envelope ID: 99395135

Filing Code Description: OTHER

Filing Description: CIVIL CASE INFORMATION SHEET

Status as of 4/8/2025 4:54 PM CST

#### **Case Contacts**

<b>Name</b>	<b>BarNumber</b>	<b>Email</b>	<b>TimestampSubmitted</b>	<b>Status</b>
Manfred Sternberg		manfred@msternberg.com	4/8/2025 9:56:52 AM	NOT SENT
Richard LaGarde		richard@lagardelaw.com	4/8/2025 9:56:52 AM	NOT SENT
Mary EllisLaGarde		mary@lagardelaw.com	4/8/2025 9:56:52 AM	NOT SENT
Jeffrey DaleAdams		jeff@jeffadamslaw.com	4/8/2025 9:56:52 AM	NOT SENT

# **Exhibit 4**



**VELVA L. PRICE**  
District Clerk, Travis County  
Civil Division (512) 854-9457

4/10/2025 6:39 PM  
Velva L. Price  
District Clerk  
Travis County  
D-1-GN-25-002446  
Selina Hamilton

### Process Request Form

**CASE NUMBER:** D-1-GN-25-002446

**COURT:** 353RD

**NAME(S) OF DOCUMENTS TO BE SERVED:** Plaintiff's Original Petition

**FILE DATE:** 08/04/2025

Day/Month/Year

**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served- Additional Parties on page 2)

1. **Issue Service to:** LAWRENCE ANTHONY DIMATTEO III

**Address of Service:** 5104 Alonso Drive

**City, State & Zip:** Austin, TX 78738

**Agent:** (if applicable) \_\_\_\_\_

#### TYPE OF SERVICE/PROCESS TO BE ISSUED:

- ☒ Citation ☐ Citation by Posting ☐ Citations Rule 106 Service ☐ Hague Convention Citation  
☐ Secretary of State/ Highway Commission/Commissioner of Insurance Citation  
☐ Citation by Publication: Newspaper \_\_\_\_\_  
☐ Show Cause ☐ Notice ☐ Temporary Restraining Order ☐ Temporary Protective Order  
☐ Capias ☐ Attachment ☐ Habeas Corpus  
☐ Subpoena ☐ Garnishment ☐ Injunction ☐ Sequestration ☐ Abstract ☐ Execution  
☐ Other (Please Describe) \_\_\_\_\_

#### SERVICE BY (check one):

☒ **ATTORNEY/REQUESTER:** (Email) RICHARD@LAGARDELAW.COM

☐ **PROCESS SERVER:** (Email) \_\_\_\_\_

☐ **PICK UP:** (Person/Agency Name and Phone Number) \_\_\_\_\_

☐ **TRAVIS COUNTY CONSTABLE:** Please select PCT if you have a preference ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☒ 5

☐ **CERTIFIED MAIL**

☐ **OTHER, explain:** \_\_\_\_\_

#### Requested by:

**Name:** RICHARD L. LAGARDE

**Mailing Address:** 230 westcott St., Suite 100

**City, state, Zip:** Houston, TX 77007

**Phone Number:** (713) 993-0660

**E-mail Address:** RICHARD@LAGARDELAW.COM

**Notes/Comments to the clerk:** \_\_\_\_\_

### Civil Process Request Form - Additional Parties

---

**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served)

2. Issue Service to: MATTHEW CLEMENSON  
Address of Service: 1115 Union street  
City, State & Zip: San Francisco, CA 94109  
Agent: (if applicable) \_\_\_\_\_
3. Issue Service to: RYAN DICKINSON  
Address of Service: 5617 Lipan Apache Bend  
City, State & Zip: Austin, TX 78738  
Agent: (if applicable) \_\_\_\_\_
4. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_
5. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_
6. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_
7. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

# **Exhibit 5**





**VELVA L. PRICE**  
District Clerk, Travis County  
Civil Division (512) 854-9457

4/10/2025 6:51 PM  
Velva L. Price  
District Clerk  
Travis County  
D-1-GN-25-002446  
Selina Hamilton

### Process Request Form

CASE NUMBER: D-1-GN-25-002446 COURT: 353rd

NAME(S) OF DOCUMENTS TO BE SERVED: Plaintiff's Original Petition

FILE DATE: 08/04/2025  
Day/Month/Year

SERVICE TO BE ISSUED ON: (Please List Exactly As The Name Appears In The Pleading To Be Served- Additional Parties on page 2)

1. Issue Service to: ROOK TX LP

Address of Service: 1313 N. Market St., Ste. 5100

City, State & Zip: Wilmington, DE 19801

Agent: (if applicable) PHS Corporate Services, Inc.

#### TYPE OF SERVICE/PROCESS TO BE ISSUED:

- ☒ Citation ☐ Citation by Posting ☐ Citations Rule 106 Service ☐ Hague Convention Citation  
☐ Secretary of State/ Highway Commission/Commissioner of Insurance Citation  
☐ Citation by Publication: Newspaper \_\_\_\_\_  
☐ Show Cause ☐ Notice ☐ Temporary Restraining Order ☐ Temporary Protective Order  
☐ Capias ☐ Attachment ☐ Habeas Corpus  
☐ Subpoena ☐ Garnishment ☐ Injunction ☐ Sequestration ☐ Abstract ☐ Execution  
☐ Other (Please Describe) \_\_\_\_\_

#### SERVICE BY (check one):

- ☒ ATTORNEY/REQUESTER: (Email) RICHARD@LAGARDELAW.COM  
☐ PROCESS SERVER: (Email) \_\_\_\_\_  
☐ PICK UP: (Person/Agency Name and Phone Number) \_\_\_\_\_  
☐ TRAVIS COUNTY CONSTABLE: Please select PCT if you have a preference ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☒ 5  
☐ CERTIFIED MAIL  
☐ OTHER, explain: \_\_\_\_\_

#### Requested by:

Name: RICHARD L. LAGARDE  
Mailing Address: 230 WESTCOTT ST., SUITE 100  
City, state, Zip: HOUSTON, TX 77007  
Phone Number: (713) 993-0660  
E-mail Address: RICHARD@LAGARDELAW.COM

Notes/Comments to the clerk: \_\_\_\_\_ Page 35

### Civil Process Request Form - Additional Parties

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**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served)

2. Issue Service to: ROOK GP LLC  
Address of Service: 1313 N. Market St., Ste. 5100  
City, State & Zip: Wilmington, DE 19801  
Agent: (if applicable) PHS Corporate Services, Inc.
  
3. Issue Service to: LOTTERY.COM, INC.  
Address of Service: 1209 Orange St.  
City, State & Zip: Wilmington, De 19801  
Agent: (if applicable) The Corporation Trust Company
  
4. Issue Service to: AUTOLOTTO, INC.  
Address of Service: 1999 Bryan St., Ste. 900  
City, State & Zip: Dallas, TX 75201  
Agent: (if applicable) CT Corporation System
  
5. Issue Service to: LOTTERY NOW, INC.  
Address of Service: 14001 W. Hwy 29, Suite 102  
City, State & Zip: Liberty Hill, TX 78642  
Agent: (if applicable) Paracorp Incorporated
  
6. Issue Service to: ALTX MANAGEMENT, LLC  
Address of Service: 2225 Veranda Avenue  
City, State & Zip: Trophy Club, TX 76262  
Agent: (if applicable) Nur Ali
  
7. Issue Service to: QAWI AND QUDDUS, INC.  
Address of Service: 15408 Prestancia Drive  
City, State & Zip: Austin, TX 78717  
Agent: (if applicable) Nizar Ali

# **Exhibit 6**



**VELVA L. PRICE**  
District Clerk, Travis County  
Civil Division (512) 854-9457

4/10/2025 7:02 PM  
Velva L. Price  
District Clerk  
Travis County  
D-1-GN-25-002446  
Selina Hamilton

### Process Request Form

CASE NUMBER: D-1-GN-25-002446 COURT: 353RD  
NAME(S) OF DOCUMENTS TO BE SERVED: PLAINTIFF'S ORIGINAL PETITION

FILE DATE: 08/04/2025  
Day/Month/Year

SERVICE TO BE ISSUED ON: (Please List Exactly As The Name Appears In The Pleading To Be Served- Additional Parties on page 2)

1. Issue Service to: COLOSSUS BETS LIMITED  
Address of Service: 21 LOMBARD STREET  
City, State & Zip: LONDON, EC3V 9AH, UK  
Agent: (if applicable) MERCER & HOLE

#### TYPE OF SERVICE/PROCESS TO BE ISSUED:

- ☐ Citation ☐ Citation by Posting ☐ Citations Rule 106 Service ☒ Hague Convention Citation  
☐ Secretary of State/ Highway Commission/Commissioner of Insurance Citation  
☐ Citation by Publication: Newspaper \_\_\_\_\_  
☐ Show Cause ☐ Notice ☐ Temporary Restraining Order ☐ Temporary Protective Order  
☐ Capias ☐ Attachment ☐ Habeas Corpus  
☐ Subpoena ☐ Garnishment ☐ Injunction ☐ Sequestration ☐ Abstract ☐ Execution  
☐ Other (Please Describe) \_\_\_\_\_

#### SERVICE BY (check one):

- ☒ ATTORNEY/REQUESTER: (Email) RICHARD@LAGARDELAW.COM  
☐ PROCESS SERVER: (Email) \_\_\_\_\_  
☐ PICK UP: (Person/Agency Name and Phone Number) \_\_\_\_\_  
☐ TRAVIS COUNTY CONSTABLE: Please select PCT if you have a preference ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☒ 5  
☐ CERTIFIED MAIL  
☐ OTHER, explain: \_\_\_\_\_

#### Requested by:

Name: RICHARD L. LAGARDE  
Mailing Address: 230 WESTCOTT, SUITE 100  
City, state, Zip: HOUSTON, TX 77007  
Phone Number: 713-993-0660  
E-mail Address: RICHARD@LAGARDELAW.COM

Notes/Comments to the clerk: \_\_\_\_\_

## Civil Process Request Form - Additional Parties

---

**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served)

2. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

3. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

4. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

5. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

6. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

7. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

# **Exhibit 7**

**353rd District Court of TRAVIS County, Texas**

PO BOX 1748 AUSTIN TX 78767

**CASE #: D-1-GN-25-002446**

**JERRY B. REED**

*Plaintiff*

**vs**

**ROOK TX, LP ET AL**

*Defendant*

**AFFIDAVIT OF SERVICE**

**I, JOSEPH S HILLIARD, make statement to the fact;**

That I am a competent person more than 18 years of age or older and not a party to this action, nor interested in outcome of the suit. That I received the documents stated below on 04/17/25 9:04 am, instructing for same to be delivered upon DIMATTEO, LAWRENCE ANTHONY (III).

That I delivered to: DIMATTEO, LAWRENCE ANTHONY (III)

the following : CITATION; PLAINTIFF'S ORIGINAL PETITION

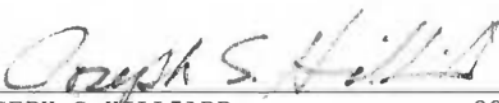
at this address : 5104 ALONSO DRIVE  
Austin, Travis County, TX 78738

Manner of Delivery : By PERSONALLY delivering the document(s) to the person above.

Delivered on : Thursday APR 17, 2025 1:34 pm

My name is JOSEPH S HILLIARD, my date of birth is NOV 25th, 1963, and my address is 32 White Magnolia Circle, Lakeway, TX 78734, U.S.A. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Travis, County, State of Texas, on the 17th day of April, 2025.

  
\_\_\_\_\_  
JOSEPH S HILLIARD 3286 Declarant  
TX Certification#: PSC-24510 Exp. 05/31/2026

AX02A25404363

Service Fee: 95.00 PCP Inv#: A25404363

Witness Fee: .00

Mileage Fee: .00 Reference : JERRY B. REED

Sternberg, Manfred (Jr)

**eaffidavits@pcpusa.net**

**E-FILE RETURN**

**Page 41**

C I T A T I O N  
T H E   S T A T E   O F   T E X A S  
C A U S E   N O .   D - 1 - G N - 2 5 - 0 0 2 4 4 6

JERRY B REED

, PLAINTIFF(S)

vs.

ROOK TX LP; ROOK GP, LLC; LOTTERY.COM, INC; AUTOLOTTO, INC; LOTTERY NOW, INC;  
COLOSSUS BETS LIMITED; ALTX MANAGEMENT, LLC; QAWI AND QUDDUS, INC; LAWRENCE  
ANTHONY DIMATTEO, III; MATTHEW CLEMENSON; RYAN DICKINSON

, DEFENDANT(S)

TO:   **LAWRENCE ANTHONY DIMATTEO III**  
         **5104 ALONSO DRIVE**  
         **AUSTIN TX 78738**

Defendant, in the above styled and numbered cause:


**YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org."**

Attached is a copy of the **PLAINTIFF'S ORIGINAL PETITION** in the above styled and numbered cause, which was filed on **APRIL 08, 2025** in the **353RD DISTRICT COURT** of Travis County, Austin, Texas.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office, **APRIL 14, 2025**

REQUESTED BY:  
**RICHARD L LAGARDE**  
**1004 Congress St Ste 200**  
**Houston, TX 77002-1762**



  
Velva L Price  
Travis County District Clerk  
Civil Family Court Facility (CFCF)  
1700 Guadalupe Street, P.O. Box 679003 (78767)  
Austin TX 78701

**Selina Hamilton, Deputy**

**R E T U R N**

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_ M., and executed at \_\_\_\_\_ within the County of \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_ M., by delivering to the within named \_\_\_\_\_, each in person, a true copy of this citation together with the **PLAINTIFF'S ORIGINAL PETITION** accompanying pleading, having first attached such copy of such citation to such copy of pleading and endorsed on such copy of citation the date of delivery.

Service Fee: \$ \_\_\_\_\_

Sworn to and subscribed before me this the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

\_\_\_\_\_  
Notary Public, THE STATE OF TEXAS  
**D-1-GN-25-002446**

\_\_\_\_\_  
Sheriff / Constable / Authorized Person

By: \_\_\_\_\_

\_\_\_\_\_  
Printed Name of Server

\_\_\_\_\_  
County, Texas

**SERVICE FEE NOT PAID**



# **Exhibit 8**

**NO. D-1-GN-25-002446**

<b>JERRY B. REED</b>	§	<b>IN THE DISTRICT COURT OF</b>
<i>Plaintiff</i>	§	
<b>VS.</b>	§	<b>TRAVIS COUNTY, TEXAS</b>
<b>ROOK TX, LP et al.</b>	§	
<i>Defendants</i>	§	<b>353rd JUDICIAL DISTRICT</b>

**PLAINTIFF'S FIRST AMENDED PETITION**

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW, Plaintiff, JERRY B. REED and brings this action against Defendants ROOK TX LP, ROOK GP, LLC, COLOSSUS BETS LIMITED, LOTTERY.COM, INC., AUTOLOTTO, INC., LOTTERY NOW, INC., ALTX MANAGEMENT, LLC, QAWI AND QUDDUS, INC., LAWRENCE ANTHONY "TONY" DIMATTEO III, MATTHEW CLEMENSON, RYAN DICKINSON, BERNARD MARANTELLI, and ZELJKO RANOGAJEC A/K/A JOHN WILSON, and alleges as follows:

**A. NATURE OF THIS CASE**

1. This action is filed on behalf of Jerry Reed, a Texas lottery player who won the Lotto Texas jackpot on May 17, 2023. Recent Texas Senate hearings revealed that the May 17th jackpot, won by Plaintiff, should have been \$95 million larger. This discrepancy is attributed to an illegal game-rigging and money-laundering scheme perpetrated by Defendants during the earlier Lotto Texas drawing on April 22, 2023.

2. Plaintiff seeks recovery of funds fraudulently and illegally obtained by Defendants and which rightfully should have been included in the Lotto Texas jackpot he won on May 17, 2023.

#### B. DISCOVERY- CONTROL PLAN

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

#### C. RELIEF

4. Plaintiff seeks monetary relief over \$1,000,000.

#### D. PARTIES

5. Plaintiff JERRY B. REED is a resident of Hood County Texas.

6. Defendant ROOK TX LP is a limited partnership organized and existing under the laws of Delaware. Defendant engaged in business in Texas, but does not maintain a regular place of business in Texas or a designated agent for service of process. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by 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 ROOK GP LLC is a limited liability company organized and existing under the laws of Delaware. Defendant engaged in business in Texas, but does not maintain a regular place of business in Texas or a designated agent for service of process. This suit arose from

Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant ROOK GP LLC as more fully described below. Accordingly, Defendant ROOK GP LLC 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.

8. Defendant COLOSSUS BETS LIMITED, a limited liability company formed and existing under the laws of the United Kingdom, whose home office is located at 21 Lombard Street, London, EC3V 9AH, may be served through the Hague Service Convention or by other means directed by the court, provided they are not prohibited by the UK's law or international agreements. Defendant engaged in business in Texas but has not designated or maintained a resident agent for service of process in Texas. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant as more fully described below.

9. Defendant LOTTERY.COM, INC., is an entity organized and existing under the laws of Delaware. Defendant engaged in business in Texas, but does not maintain a regular place of business in Texas or a designated agent for service of process. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant as more fully described below. Accordingly, Defendant Lottery.com, Inc. 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.

10. Defendant AUTOLOTTO, INC. is a Delaware entity that has engaged in business in Texas. Defendant may be served with process through its registered agent, C T Corporation System Address 1999 Bryan St., Ste. 900 Dallas, TX 75201-3136.

11. Defendant LOTTERY NOW, INC. is a Delaware entity that has engaged in business in Texas. Defendant may be served with process through its registered agent, Paracorp Incorporated, 14001 W Hwy 29 Suite 102, Liberty Hill, TX 78642.

12. Defendant ALTX MANAGEMENT, LLC, a Texas entity whose registered office is located in Denton County Texas, may be served with process by serving its registered agent for service of process, Nur Ali, in Denton County at 2225 Veranda Avenue, Trophy Club, TX 76262.

13. Defendant QAWI AND QUDDUS, INC., D/B/A LUCK ZONE, a Texas entity whose registered office is in Travis County Texas, may be served with process by serving its registered agent for service of process, Nizar Ali, in Travis County at 15408 Prestancia Drive, Austin, TX 78717.

14. Defendant LAWRENCE ANTHONY "TONY" DIMATTEO III, an individual, may be served with process at Defendant's home address in Travis County at 5104 Alonso Drive, Austin, TX 78738.

15. Defendant MATTHEW CLEMENSON, an individual who is a nonresident of Texas, whose home is located at 1115 Union Street, San Francisco, CA 94109, may be served with process by serving the Texas Secretary of State at 1019 Brazos Street, Austin, Texas 78701, as Defendant's agent for service because Defendant engaged in business in Texas but has not designated or maintained a resident agent for service of process in Texas. This suit arose from

Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant as more fully described below.

16. Defendant RYAN DICKINSON, an individual, may be served with process at Defendant's home address in Travis County at 5617 Lipan Apache Bend, Austin, TX 78738.

17. Defendant BERNARD MARANTELLI is a citizen of Australia who resides in Spain and works in the United Kingdom. Defendant engaged in business in Texas but has not designated or maintained a resident agent for service of process in Texas. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant as more fully described below. Defendant may be served through the Hague Service Convention or by other means directed by the court, provided they are not prohibited by local law or international agreements.

18. Defendant ZELJKO RANOGAJEC A/K/A JOHN WILSON is a citizen of Australia who resides in London and works on the Isle of Man. Defendant engaged in business in Texas but has not designated or maintained a resident agent for service of process in Texas. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant as more fully described below. Defendant may be served through the Hague Service Convention or by other means directed by the court, provided they are not prohibited by local law or international agreements.

#### E. JURISDICTION

19. This Court has jurisdiction over the claims because the amount in controversy exceeds the minimum jurisdictional limits of the Court.

## F. VENUE

20. Venue is proper in Travis County under Texas Civil Practice and Remedies Code section 15.002 because Defendants Lawrence Anthony DiMatteo III and Ryan Dickinson are residents of Travis County and Defendants AltX Management, LLC, and Qawi and Quddus, Inc., d/b/a Luck Zone maintain their principal offices in Texas in Travis County.

## G. FACTUAL BACKGROUND

21. Defendant Bernard Marantelli ("Marantelli") is an Australian professional gambler and co-founder of Colossus Bets Ltd. in London.

22. Defendant Zeljko Ranogajec a/k/a John Wilson ("Ranogajec") is an enigmatic Australian professional gambler. Ranogajec is nicknamed "The Joker" and is reputed to be the wealthiest gambler in the world. Ranogajec co-founded Colossus Bets Ltd. with Marantelli and currently resides in London.

23. Defendant Colossus Bets Limited ("Colossus Bets"), a London-based betting company founded by Marantelli and Ranogajec, specializes in group purchasing arrangements for gamblers. It organizes syndicates of individuals and organizations, pools their funds, and places substantial wagers in exchange for a commission fee.

24. In 2019, Marantelli traveled from the United Kingdom to Stamford, Connecticut, aiming to win the Connecticut State Lottery jackpot by purchasing nearly two million tickets. While he did not succeed in winning the jackpot, his fascination with strategies to rig a U.S. state lottery persisted.

25. Marantelli, Ranogajec, and their company Colossus Bets Limited continued to explore the possibility of rigging a state lottery by purchasing nearly every possible number combination. They found that opportunity in Texas in April of 2023.

26. Following a seven-month period without a winner, the Lotto Texas jackpot ballooned to \$95 million for the drawing on April 22, 2023, the game's largest in over 12 years. The odds of matching 6 out of 6 numbers to win a Lotto Texas jackpot are 1 in 25,827,165.

27. Marantelli, Ranogajec, and their company, Colossus Bets Limited, collaborated with Lottery.com and its founders on a scheme to buy nearly every possible number combination in the Lotto Texas drawing. The founders of Lottery.com—Dimatteo, Clemenson, and Dickinson—had also previously considered purchasing all combinations in a state lottery. Together, these five individuals and two companies planned and executed the purchase of nearly all 25.8 million number combinations, effectively rigging the April 22, 2023, Lotto Texas game. This operation is regarded as one of the most significant lottery-rigging cases in U.S. history. Texas Lieutenant Governor Dan Patrick described it as the “biggest theft from the people of Texas in the state’s history”.

28. The game rigging scheme was ostensibly designed to guarantee that the conspirators would win the \$95 million lottery jackpot. The true object was likely more sinister. As Texas State Senator Paul Bettencourt declared in a recent hearing, “This is a 99% probability of money laundering.” The Chairman of the Texas Lottery Commission (“TLC”), Robert Rivera, agreed that “[i]t does sound like money laundering.” TLC Commissioner Clark E. Smith likewise stated, “[i]t seems to me to be an indication of money laundering....I can see it being a strong indication of money laundering”.

29. Colossus Bets, utilizing funds from various sources, including its co-founder Ranogajec, financed the Defendants' game rigging scheme in April of 2023.

30. The group purchase arrangement used by Marantelli, Ranogajec, Colossus Bets, Lottery.com, Dimatteo, Clemenson, and Dickinson (hereinafter collectively referred to as “The Conspirators”) was illegal and in violation of Texas Gov’t Code §466.3054 which prohibits



establishing or promoting a group purchase or pooling arrangement under which lottery tickets are purchased on behalf of the group or pool and any prize is divided among the members of the group or pool, and the person intentionally or knowingly: (1) uses any part of the funds solicited or accepted for a purpose other than purchasing tickets on behalf of the group or pool; or (2) retains a share of any prize awarded as compensation for establishing or promoting the group purchase or pooling arrangement. A violation of § 466.3054 is a third-degree felony in Texas.

31. The Conspirators enlisted four Texas lottery retailers to join in their plan to rig the Lotto Texas drawing. In exchange for printing lottery tickets covering the 25.8 million possible number combinations, the four retailers were promised a percentage of the price paid for each ticket. The participating ticket retailers included Spicewood retailer Autolotto, Inc. doing business as Lottery.com (“Autolotto”), Waco retailer AltX Management, LLC (“AltX”), Round Rock retailer Qawi and Quddus, Inc., doing business as Luck Zone (“Luck Zone”), and Colleyville retailer Lottery Now, Inc. (“Lottery Now”) (hereinafter referred to collectively as the “Ticket Retailers”).

32. The Conspirators and the Ticket Retailers faced significant challenges, as they had only 72 hours between Lotto Texas drawings to purchase lottery tickets representing all the possible 25.8 million number combinations. This task was essentially impossible under normal circumstances due to the limitations of the Texas Lottery terminals used for playing Lotto Texas.

33. The Texas Lottery terminals allow customers to purchase tickets through only three methods:

- Paper Slips: Customers fill out a slip with a pencil, marking up to 5 ticket combinations per slip. The slip is then scanned, and a corresponding ticket is printed.
- Touch Screen Input: Customers manually enter their desired combinations using a touch screen and either their finger or a stylus.

- Texas Lottery Mobile App: Customers can enter up to 10 combinations of numbers and generate a QR code on the official Texas Lottery app. This QR code must be presented to a Texas Lottery retailer, who uses a barcode scanner to process a maximum of 10 number combinations per QR code.

34. Each of these methods is time-consuming and imposes significant constraints, making it impractical to achieve the volume of tickets needed within the given timeframe.

35. Defendants overcame this challenge through an ingenious method. They used custom-designed software, loaded onto smartphones, to generate a system of counterfeit QR codes that tricked the state-approved Texas Lottery terminals into recognizing the codes as if they had been generated by the Texas Lottery Commission's authorized mobile app. These counterfeit QR codes were designed to allow nearly all 25.8 million Lotto Texas number combinations to be entered into the terminals. By wirelessly scanning these specially created counterfeit QR codes into the Lotto Texas terminals, Defendants were able to print nearly 2.58 million tickets in less than 72 hours with each ticket containing 10 number combinations. This method enabled Defendants to guarantee a win of the \$95 million jackpot.

36. Defendants violated Texas law by using counterfeit QR codes. According to 16 Tex. Admin. Code § 401.304, plays for draw games may be entered using various approved methods, including QR codes. However, QR codes must be generated through the Texas Lottery Mobile Application, as officially approved by the lottery commission. Under Texas law, tickets created using custom-designed QR code-generating software—an unapproved selection method—are deemed invalid and void.

37. Defendants also violated Texas law by wirelessly connecting smartphones loaded with custom-designed QR code-generating software to Texas Lottery terminals through the terminals' barcode scanning devices. According to 16 Tex. Admin. Code § 401.304, "no hardware

or software shall be connected to a Texas Lottery terminal, either directly or wirelessly, without the permission of the Texas Lottery Commission.” Defendants did not obtain permission to wirelessly connect their custom-designed software to Texas Lottery terminals. Furthermore, the only QR code-generating software approved by the Texas Lottery Commission is the official Texas Lottery mobile app. Consequently, the use of Defendants' custom-designed QR code-generating software was unlawful. As a result, both the winning ticket and all other tickets printed through this scheme were invalid on their face, as they contravened established rules.

38. To process millions of tickets within the 72-hour window between Lotto Texas draws, the Ticket Retailers were required to rapidly and significantly scale up their operations. Since lottery tickets can only be purchased and printed on state-issued lottery terminals, this posed a considerable logistical challenge. Most retailers typically operate with just one or two of these machines, making such a large-scale operation impossible.

39. The Ticket Retailers addressed this issue by submitting emergency requests for additional lottery terminals and sufficient paper stock to print 2.58 million tickets.

40. Records indicate that an outlet affiliated with Lottery.com and operated by Autolotto, Inc. had not sold tickets for several months. However, on April 19, 2023, the day sales began for the April 22 Lotto Texas draw, the company submitted an urgent request to the Texas Lottery Commission for 10 additional terminals.

41. On the same day, a Waco retailer affiliated with Lottery.com and operated by AltX Management LLC, also placed a rush order. It had sold almost no tickets in recent months but requested 5 additional terminals on an emergency basis.

42. Meanwhile, a third retailer in Colleyville, operated by Lottery Now, Inc., experienced a sudden increase in activity. Earlier that year, the store near Fort Worth had operated

with only a single lottery terminal. As the April 22nd jackpot game drew closer, the retailer requested 12 additional terminals from the Texas Lottery Commission.

43. Only one ticket matched all the winning numbers in the Match 6 game of the April 22, 2023, Lotto Texas drawing: 3, 5, 18, 29, 30, and 52. The winning \$95 million ticket was one of the tickets generated through Defendants' illegal game rigging scheme.

44. On June 14, 2023, Marantelli, Ranogajec, and Colossus Bets, or agents acting on their behalf, formed Rook GP LLC, a limited liability Delaware company. On June 15, 2023, Marantelli, Ranogajec, and Colossus Bets, or agents acting on their behalf, formed Rook TX LP, a Delaware limited partnership company. Both Rook GP LLC and Rook TX LP were formed as vehicles to hide the identity of the company(s) and individual(s) who received the proceeds of the illegal game rigging scheme.

45. On June 27, 2023, New Jersey attorney Glenn Gelband presented the winning \$95 million ticket to Texas Lottery authorities. Gelband endorsed the ticket as “Glenn Gelband, solely in his capacity as the Managing Member of Rook GP LLC, a Delaware limited liability company, which is the General Partner of Rook TX LP, a Delaware limited partnership, on behalf of Rook TX LP.”

46. On the same day, Gelband, acting on behalf of Rook GP LLC, filled out and signed a Texas Lottery Winner Claim Form designed for use by entities claiming prizes of \$1 million or more. On the form, Gelband identified the winning entity as Rook TX LP and represented that the entity was created on “03/01/2023” which would have been seven weeks before the April 22<sup>nd</sup> Lotto Texas draw. This was a false representation by both Rook GP LLC and Rook TX LP. Rook TX LP was, in fact, created on June 15, 2023, more than seven weeks after the April 22<sup>nd</sup> Lotto Texas draw. In addition, Gelband represented that Rook TX LP received the ticket on April 21, 2023, which was a false representation because Rook TX LP did not even exist at that time.

47. By misrepresenting the creation date of the entity claiming the \$95 million jackpot and the date that entity received the ticket, Defendants violated Texas Gov't Code § 466.308 by intentionally or knowingly claiming a lottery prize or share of a prize by means of fraud, deceit, or misrepresentation and/or by aiding or agreeing to aid other Defendants to claim a lottery prize or a share of a lottery prize by means of fraud, deceit, or misrepresentation. Violation of § 466.308 is a second-degree felony.

48. Rook TX LP rejected the annuity option under which the \$95 million jackpot would have been paid out over 30 years in annual installments. Instead, Rook TX LP opted for a reduced one-time lump sum cash payment of \$57,804,374.

49. Defendants' illegal group purchase scheme resulted in Rook TX LP cashing in the following tickets:

Match 6	1 ticket at \$95,000,000	\$57,804,374 (lump sum)
Match 5	288 tickets at \$2,015 each	\$580,320
Match 4	16,925 tickets at \$50 each	\$846,250
Match 3	377,360 tickets at \$3 each	<u>\$1,033,086</u>
Total Won		\$60,264,030

50. By rigging the game to guarantee Defendants a win, all the Defendants violated Texas Gov't Code §466.307 which prohibits a person from intentionally or knowingly influencing or attempting to influence the selection of the winner of a lottery game. A violation of §466.307 is a second-degree felony.

51. The Ticket Retailers likewise violated Texas Government Code § 466.305, which prohibits the sale of lottery tickets on credit. Unlike standard lottery transactions, the Ticket Retailers did not collect payment for the tickets at the time of their printing. Instead, the Ticket Retailers extended credit to Colossus Bets, postponing the collection of \$25.8 million from

Colossus Bets until after the Lotto Texas drawing was completed and the jackpot had already been won. A violation of § 466.305 is a Class C misdemeanor.

52. Between April 22, 2023, and May 17, 2023, no winning Lotto Texas tickets were sold.

53. Plaintiff Jerry Reed, like millions of other Texans, regularly played Lotto Texas using the same combination of numbers that he and his wife, Melissa, had used for many years.

54. On May 17th, Jerry Reed used that same combination of numbers and finally won the Lotto Texas jackpot, which had been reduced to \$7.5 million following the \$95 million payout on April 22nd. Tragically, Jerry's wife Melissa did not live long enough to see their years of dedication to the lottery rewarded.

55. Had the Defendants not engaged in their illegal money laundering and game-rigging scheme connected to the April 22nd draw, the \$95 million jackpot would have rolled over, as there were no other winners. Consequently, Jerry Reed's May 17th jackpot win would have been \$102.5 million instead of \$7.5 million.

#### H. COUNT I – MONEY HAD AND RECEIVED

56. Defendants hold money that, in good conscience, belongs to Plaintiff. By illegally rigging the game to win the \$95 million jackpot on March 22, 2023, Defendants reduced the size of the Lotto Texas jackpot won by Plaintiff on May 17, 2023, and therefore deprived Plaintiff of that money. Plaintiff seeks liquidated damages in the amount of at least \$95 million.

#### I. COUNT II – CONSPIRACY

57. Each of the Defendants, in combination with one another, agreed to engage in an illegal bulk purchase of Lotto Texas tickets to rig the game in their favor and to launder illicit funds. Defendants employed unlawful means, as outlined above, to accomplish their goals.

Defendants intended to rig the April 22, 2023, Lotto Texas draw, depriving other players of prize money in that game and subsequent ones. To accomplish the object of their agreement, Defendants engaged in the unlawful overt acts outlined above. The agreement by Defendants to illegally rig the April 22<sup>nd</sup> game caused injury to Plaintiff. Defendants are jointly and severally liable for the financial injury suffered by Plaintiff as a direct and proximate result of Defendants' conspiracy.

#### J. COUNT III – AIDING AND ABETTING

58. Each of the Defendants knew that the conduct outlined above was illegal. With the intent to assist one another accomplish the bulk purchase of lottery tickets through unlawful means, each of the Defendants assisted and/or encouraged one another to accomplish their unlawful methods and goal. Defendants' assistance and encouragement was a substantial factor causing harm to Plaintiff. Defendants are jointly and severally liable for the financial injury suffered by Plaintiff as a direct and proximate result of their assistance and encouragement of the unlawful methods used to accomplish a bulk purchase of lottery tickets.

#### K. COUNT IV – ASSISTING & PARTICIPATING

59. Each of the Defendants substantially assisted one another in causing the unlawful actions used to accomplish the illegal bulk purchase of lottery tickets. Each of the Defendant's assistance and participation, separate from one another's acts, breached duties owed to the lottery players of the State of Texas, including Plaintiff. Defendants' assistance & participation was a substantial factor in causing the unlawful methods used to accomplish a bulk purchase of lottery tickets. Defendants are jointly and severally liable for the financial injury suffered by Plaintiff as a direct and proximate result of Defendants' assistance & participation.

#### L. COUNT V – CONCERT OF ACTION

60. Each of the Defendants agreed with one another to engage in the unlawful acts outlined above. Defendants agreed to engage in these unlawful acts to rig the Lotto Texas game in their favor, which was highly antisocial and likely to cause harm to the integrity and reputation of the Texas Lottery and harm to the millions of lottery players who relied upon the honesty and fairness of the Texas Lottery. Each of the Defendants' acts were intentional. Defendants' acts in carrying out the agreement caused harm to Plaintiff. Defendants are jointly and severally liable for the financial injury suffered by Plaintiff as a direct and proximate result of Defendants' concert of action.

#### M. COUNT VI – NEGLIGENCE PER SE

61. Defendants violated Texas Government Code §§ 466.155, 466.3054, 466.305, 466.307, and 466.308 as well as 16 Tex. Admin. Code §401.304. These statutes and administrative regulations aim to ensure fairness and integrity in Texas lottery games and to prevent cheating. They are designed to protect Texas lottery players like Plaintiff against the type of injury he suffered.

62. These statutes and administrative regulations are of the type that impose tort liability.

63. Defendants' violation of these statutes and administrative regulations was without legal excuse.

64. Defendants' breach of the duty imposed by these statutes and administrative regulations proximately caused injury to Plaintiff, which resulted in a \$95 million reduction in the Lotto Texas jackpot Plaintiff won on May 17, 2023.

65. Plaintiff seeks damages within the jurisdictional limits of this Court.



#### N. COUNT VII – EXEMPLARY DAMAGES

66. Plaintiff's injury resulted from Defendants' fraudulent and malicious use of unlawful means to accomplish their goal of rigging the Lotto Texas game in their favor and of laundering money, which actions entitle Plaintiff to exemplary damages under Texas Civ. Prac. & Rem. Code § 41.003(a).

#### O. REQUEST FOR DISCLOSURE

67. Under Texas Rule of Civil Procedure 194, Plaintiff requests that Defendants disclose, within 50 days of the service of this request, the information or material described in Rule 194.2.

#### P. PRAYER FOR RELIEF

68. For these reasons, Plaintiff asks that the Court issue citation for Defendants to appear and answer, and that Plaintiff be awarded a judgment against Defendants for the following:

- a. Actual damages.
- b. Exemplary damages.
- c. Prejudgment and postjudgment interest.
- d. Attorney's fees and Court costs.
- e. All other relief to which Plaintiff is entitled.

#### Q. JURY DEMAND

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

Respectfully submitted,

LAGARDE LAW FIRM, P.C.



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CO-COUNSEL FOR PLAINTIFF

# **Exhibit 9**

**NO. D-1-GN-25-002446**

<b>JERRY B. REED</b>	§	<b>IN THE DISTRICT COURT OF</b>
<i>Plaintiff</i>	§	
<b>VS.</b>	§	<b>TRAVIS COUNTY, TEXAS</b>
<b>ROOK TX, LP et al.</b>	§	
<i>Defendants</i>	§	<b>353rd JUDICIAL DISTRICT</b>

**PLAINTIFF'S SECOND AMENDED PETITION**

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW, Plaintiff, JERRY B. REED and brings this action against Defendants ROOK TX LP, ROOK GP, LLC, COLOSSUSBETS LIMITED, LOTTERY.COM, INC., AUTOLOTTO, INC., LOTTERY NOW, INC., ALTX MANAGEMENT, LLC, QAWI AND QUDDUS, INC., LAWRENCE ANTHONY "TONY" DIMATTEO III, MATTHEW CLEMENSON, RYAN DICKINSON, BERNARD MARANTELLI, ZELJKO RANOGAJEC A/K/A JOHN WILSON, and WHITE SWAN DATA LIMITED, and alleges as follows:

**A. NATURE OF THIS CASE**

1. This action is filed on behalf of Jerry Reed, a Texas lottery player who won the Lotto Texas jackpot on May 17, 2023. Recent Texas Senate hearings revealed that the May 17th jackpot, won by Plaintiff, should have been \$95 million larger. This discrepancy is attributed to an illegal game-rigging and money-laundering scheme perpetrated by Defendants during the earlier Lotto Texas drawing on April 22, 2023.

2. Plaintiff seeks recovery of funds fraudulently and illegally obtained by Defendants and which rightfully should have been included in the Lotto Texas jackpot he won on May 17, 2023.

#### B. DISCOVERY- CONTROL PLAN

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

#### C. RELIEF

4. Plaintiff seeks monetary relief over \$1,000,000.

#### D. PARTIES

5. Plaintiff JERRY B. REED is a resident of Hood County Texas.

6. Defendant ROOK TX LP is a limited partnership organized and existing under the laws of Delaware. Defendant engaged in business in Texas, but does not maintain a regular place of business in Texas or a designated agent for service of process. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by 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 ROOK GP LLC is a limited liability company organized and existing under the laws of Delaware. Defendant engaged in business in Texas, but does not maintain a regular place of business in Texas or a designated agent for service of process. This suit arose from

Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant ROOK GP LLC as more fully described below. Accordingly, Defendant ROOK GP LLC 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.

8. Defendant COLOSSUSBETS LIMITED, a limited liability company formed and existing under the laws of the United Kingdom, whose home office is located at 21 Lombard Street, London, EC3V 9AH, may be served through the Hague Service Convention or by other means directed by the court, provided they are not prohibited by the UK's law or international agreements. Defendant engaged in business in Texas but has not designated or maintained a resident agent for service of process in Texas. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant as more fully described below.

9. Defendant LOTTERY.COM, INC., is an entity organized and existing under the laws of Delaware. Defendant engaged in business in Texas, but does not maintain a regular place of business in Texas or a designated agent for service of process. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant as more fully described below. Accordingly, Defendant Lottery.com, Inc. 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.

10. Defendant AUTOLOTTO, INC. is a Delaware entity that has engaged in business in Texas. Defendant may be served with process through its registered agent, C T Corporation System Address 1999 Bryan St., Ste. 900 Dallas, TX 75201-3136.

11. Defendant LOTTERY NOW, INC. is a Delaware entity that has engaged in business in Texas. Defendant may be served with process through its registered agent, Paracorp Incorporated, 14001 W Hwy 29 Suite 102, Liberty Hill, TX 78642.

12. Defendant ALTX MANAGEMENT, LLC, a Texas entity whose registered office is located in Denton County Texas, may be served with process by serving its registered agent for service of process, Nur Ali, in Denton County at 2225 Veranda Avenue, Trophy Club, TX 76262.

13. Defendant QAWI AND QUDDUS, INC., D/B/A LUCK ZONE, a Texas entity whose registered office is in Travis County Texas, may be served with process by serving its registered agent for service of process, Nizar Ali, in Travis County at 15408 Prestancia Drive, Austin, TX 78717.

14. Defendant LAWRENCE ANTHONY "TONY" DIMATTEO III, an individual, may be served with process at Defendant's home address in Travis County at 5104 Alonso Drive, Austin, TX 78738.

15. Defendant MATTHEW CLEMENSON, an individual who is a nonresident of Texas, whose home is located at 1115 Union Street, San Francisco, CA 94109, may be served with process by serving the Texas Secretary of State at 1019 Brazos Street, Austin, Texas 78701, as Defendant's agent for service because Defendant engaged in business in Texas but has not designated or maintained a resident agent for service of process in Texas. This suit arose from

Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant as more fully described below.

16. Defendant RYAN DICKINSON, an individual, may be served with process at Defendant's home address in Travis County at 5617 Lipan Apache Bend, Austin, TX 78738.

17. Defendant BERNARD MARANTELLI is a citizen of Australia who resides in Spain and works in the United Kingdom. Defendant engaged in business in Texas but has not designated or maintained a resident agent for service of process in Texas. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant as more fully described below. Defendant may be served through the Hague Service Convention or by other means directed by the court, provided they are not prohibited by local law or international agreements.

18. Defendant ZELJKO RANOGAJEC A/K/A JOHN WILSON is a citizen of Australia who resides in London and works on the Isle of Man. Defendant engaged in business in Texas but has not designated or maintained a resident agent for service of process in Texas. This suit arose from Defendant's business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant as more fully described below. Defendant may be served through the Hague Service Convention or by other means directed by the court, provided they are not prohibited by local law or international agreements.

19. Defendant WHITE SWAN DATA LIMITED, a limited liability company formed and existing under the laws of the United Kingdom, whose home office is located at Aviation House, 125 Kingsway, London England WC2B 6NH, may be served through the Hague Service Convention or by other means directed by the court, provided they are not prohibited by the UK's law or international agreements. Defendant engaged in business in Texas but has not designated or maintained a resident agent for service of process in Texas. This suit arose from Defendant's



business in Texas. The causes of action asserted arose from and relate to purposeful acts committed by Defendant as more fully described below.

#### E. JURISDICTION

20. This Court has jurisdiction over the claims because the amount in controversy exceeds the minimum jurisdictional limits of the Court.

#### F. VENUE

21. Venue is proper in Travis County under Texas Civil Practice and Remedies Code section 15.002 because Defendants Lawrence Anthony DiMatteo III and Ryan Dickinson are residents of Travis County and Defendants AltX Management, LLC, and Qawi and Quddus, Inc., d/b/a Luck Zone maintain their principal offices in Texas in Travis County.

#### G. FACTUAL BACKGROUND

22. Defendant Bernard Marantelli ("Marantelli") is an Australian professional gambler and co-founder of ColossusBets Limited in London.

23. Defendant Zeljko Ranogajec a/k/a John Wilson ("Ranogajec") is an enigmatic Australian professional gambler. Ranogajec is nicknamed "The Joker" and is reputed to be the wealthiest gambler in the world. Ranogajec co-founded ColossusBets Limited with Marantelli and currently resides in London.

24. Defendant ColossusBets Limited ("ColossusBets"), a London-based betting company founded by Marantelli and Ranogajec, specializes in group purchasing arrangements for gamblers. It organizes syndicates of individuals and organizations, pools their funds, and places substantial wagers in exchange for a commission fee.

25. Defendant White Swan Data Limited (“White Swan”) is a company of mathematicians, data scientists and software engineers dedicated to finding gambling and betting opportunities for its customers. White Swan advertises that “the nature of our work and the relative immaturity of modern betting markets means opportunities to exploit are not in short supply.” Defendant’s website brags that “[a]t White Swan Data, we decide what’s worth betting on.” White Swan was founded by Defendant Bernard Marantelli.

26. In 2019, Marantelli traveled from the United Kingdom to Stamford, Connecticut, aiming to win the Connecticut State Lottery jackpot by purchasing nearly two million tickets. While he did not succeed in winning the jackpot, his fascination with strategies to rig a U.S. state lottery persisted.

27. Marantelli and his companies White Swan and ColossusBets continued to explore the possibility of rigging a state lottery in the United States by purchasing nearly every possible number combination. They found that opportunity in Texas in April of 2023.

28. Following a seven-month period without a winner, the Lotto Texas jackpot ballooned to \$95 million for the drawing on April 22, 2023, the game’s largest in over 12 years. The odds of matching 6 out of 6 numbers to win a Lotto Texas jackpot are 1 in 25,827,165.

29. Marantelli and his company, White Swan, identified the April 22, 2023, Lotto Texas drawing as an opportunity to manipulate the lottery to secure a guaranteed win. White Swan, alongside Marantelli, Ranogajec, and their jointly founded company, ColossusBets, enlisted the collaboration of Lottery.com and its three founders—Dimatteo, Clemenson, and Dickinson—who had previously contemplated buying all combinations in a state lottery. Seeing an opportunity to financially benefit their struggling company, the founders of Lottery.com partnered with White Swan, Marantelli, Ranogajec, and ColossusBets. Together, these five individuals and three companies orchestrated the purchase of nearly all 25.8 million number combinations in the Lotto

Texas drawing. This coordinated effort effectively rigged the game and is considered one of the most significant lottery-rigging cases in U.S. history. Texas Lieutenant Governor Dan Patrick referred to it as “the biggest theft from the people of Texas in the state’s history.”

30. The game-rigging scheme was ostensibly designed to guarantee that the conspirators would win the \$95 million lottery jackpot. The true object was likely more sinister. As Texas State Senator Paul Bettencourt declared in a recent hearing, “This is a 99% probability of money laundering.” The Chairman of the Texas Lottery Commission (“TLC”), Robert Rivera, agreed that “[i]t does sound like money laundering.” TLC Commissioner Clark E. Smith likewise stated, “[i]t seems to me to be an indication of money laundering....I can see it being a strong indication of money laundering”.

31. ColossusBets, utilizing funds from various sources, including its co-founder Ranogajec, financed the Defendants' game-rigging scheme in April of 2023.

32. The group purchase arrangement used by Marantelli, Ranogajec, White Swan, ColossusBets, Lottery.com, Dimatteo, Clemenson, and Dickinson (hereinafter collectively referred to as “The Conspirators”) was illegal and in violation of Texas Gov’t Code §466.3054 which prohibits establishing or promoting a group purchase or pooling arrangement under which lottery tickets are purchased on behalf of the group or pool and any prize is divided among the members of the group or pool, and the person intentionally or knowingly: (1) uses any part of the funds solicited or accepted for a purpose other than purchasing tickets on behalf of the group or pool; or (2) retains a share of any prize awarded as compensation for establishing or promoting the group purchase or pooling arrangement. A violation of § 466.3054 is a third-degree felony in Texas.

33. The Conspirators enlisted four Texas lottery retailers to join in their plan to rig the Lotto Texas drawing. In exchange for printing lottery tickets covering the 25.8 million possible

number combinations, the four retailers were promised a percentage of the price paid for each ticket. The participating ticket retailers included Spicewood retailer Autolotto, Inc. doing business as Lottery.com (“Autolotto”), Waco retailer AltX Management, LLC (“AltX”), Round Rock retailer Qawi and Quddus, Inc., doing business as Luck Zone (“Luck Zone”), and Colleyville retailer Lottery Now, Inc. (“Lottery Now”) (hereinafter referred to collectively as the “Ticket Retailers”).

34. The Conspirators and the Ticket Retailers faced significant challenges, as they had only 72 hours between Lotto Texas drawings to purchase lottery tickets representing all the possible 25.8 million number combinations. This task was essentially impossible under normal circumstances due to the limitations of the Texas Lottery terminals used for playing Lotto Texas.

35. The Texas Lottery terminals allow customers to purchase tickets through only three methods:

- Paper Slips: Customers fill out a slip with a pencil, marking up to 5 ticket combinations per slip. The slip is then scanned, and a corresponding ticket is printed.
- Touch Screen Input: Customers manually enter their desired combinations using a touch screen and either their finger or a stylus.
- Texas Lottery Mobile App: Customers can enter up to 10 combinations of numbers and generate a QR code on the official Texas Lottery app. This QR code must be presented to a Texas Lottery retailer, who uses a barcode scanner to process a maximum of 10 number combinations per QR code.

36. Each of these methods is time-consuming and imposes significant constraints, making it impractical to achieve the volume of tickets needed within the given timeframe.

37. Defendants overcame this challenge through an ingenious method. They used custom-designed software, loaded onto smartphones, to generate a system of counterfeit QR codes that tricked the state-approved Texas Lottery terminals into recognizing the codes as if they had been generated by the Texas Lottery Commission's authorized mobile app. These counterfeit QR codes were designed to allow nearly all 25.8 million Lotto Texas number combinations to be entered into the terminals. By wirelessly scanning these specially created counterfeit QR codes into the Lotto Texas terminals, Defendants were able to print nearly 2.58 million tickets in less than 72 hours with each ticket containing 10 number combinations. This method enabled Defendants to guarantee a win of the \$95 million jackpot.

38. Defendants violated Texas law by using counterfeit QR codes. According to 16 Tex. Admin. Code § 401.304, plays for draw games may be entered using various approved methods, including QR codes. However, QR codes must be generated through the Texas Lottery Mobile Application, as officially approved by the lottery commission. Under Texas law, tickets created using custom-designed QR code-generating software—an unapproved selection method—are deemed invalid and void.

39. Defendants also violated Texas law by wirelessly connecting smartphones loaded with custom-designed QR code-generating software to Texas Lottery terminals through the terminals' barcode scanning devices. According to 16 Tex. Admin. Code § 401.304, "no hardware or software shall be connected to a Texas Lottery terminal, either directly or wirelessly, without the permission of the Texas Lottery Commission." Defendants did not obtain permission to wirelessly connect their custom-designed software to Texas Lottery terminals. Furthermore, the only QR code-generating software approved by the Texas Lottery Commission is the official Texas Lottery mobile app. Consequently, the use of Defendants' custom-designed QR code-generating

software was unlawful. As a result, both the winning ticket and all other tickets printed through this scheme were invalid on their face, as they contravened established rules.

40. To process millions of tickets within the 72-hour window between Lotto Texas draws, the Ticket Retailers were required to rapidly and significantly scale up their operations. Since lottery tickets can only be purchased and printed on state-issued lottery terminals, this posed a considerable logistical challenge. Most retailers typically operate with just one or two of these machines, making such a large-scale operation impossible.

41. The Ticket Retailers addressed this issue by submitting emergency requests for additional lottery terminals and sufficient paper stock to print 2.58 million tickets.

42. Records indicate that an outlet affiliated with Lottery.com and operated by Autolotto, Inc. had not sold tickets for several months. However, on April 19, 2023, the day sales began for the April 22 Lotto Texas draw, the company submitted an urgent request to the Texas Lottery Commission for 10 additional terminals.

43. On the same day, a Waco retailer affiliated with Lottery.com and operated by AltX Management LLC, also placed a rush order. It had sold almost no tickets in recent months but requested 5 additional terminals on an emergency basis.

44. Meanwhile, a third retailer in Colleyville, operated by Lottery Now, Inc., experienced a sudden increase in activity. Earlier that year, the store near Fort Worth had operated with only a single lottery terminal. As the April 22nd jackpot game drew closer, the retailer requested 12 additional terminals from the Texas Lottery Commission.

45. Only one ticket matched all the winning numbers in the Match 6 game of the April 22, 2023, Lotto Texas drawing: 3, 5, 18, 29, 30, and 52. The winning \$95 million ticket was one of the tickets generated through Defendants' illegal game rigging scheme.

46. On June 14, 2023, Marantelli, Ranogajec, and ColossusBets, or agents acting on their behalf, formed Rook GP LLC, a limited liability Delaware company. On June 15, 2023, Marantelli, Ranogajec, and ColossusBets, or agents acting on their behalf, formed Rook TX LP, a Delaware limited partnership company. Both Rook GP LLC and Rook TX LP were formed as vehicles to hide the identity of the company(s) and individual(s) who received the proceeds of the illegal game rigging scheme.

47. On June 27, 2023, New Jersey attorney Glenn Gelband presented the winning \$95 million ticket to Texas Lottery authorities. Gelband endorsed the ticket as “Glenn Gelband, solely in his capacity as the Managing Member of Rook GP LLC, a Delaware limited liability company, which is the General Partner of Rook TX LP, a Delaware limited partnership, on behalf of Rook TX LP.”

48. On the same day, Gelband, acting on behalf of Rook GP LLC, filled out and signed a Texas Lottery Winner Claim Form designed for use by entities claiming prizes of \$1 million or more. On the form, Gelband identified the winning entity as Rook TX LP and represented that the entity was created on “03/01/2023” which would have been seven weeks before the April 22<sup>nd</sup> Lotto Texas draw. This was a false representation by both Rook GP LLC and Rook TX LP. Rook TX LP was, in fact, created on June 15, 2023, more than seven weeks after the April 22<sup>nd</sup> Lotto Texas draw. In addition, Gelband represented that Rook TX LP received the ticket on April 21, 2023, which was a false representation because Rook TX LP did not even exist at that time.

49. By misrepresenting the creation date of the entity claiming the \$95 million jackpot and the date that entity received the ticket, Defendants violated Texas Gov’t Code § 466.308 by intentionally or knowingly claiming a lottery prize or share of a prize by means of fraud, deceit, or misrepresentation and/or by aiding or agreeing to aid other Defendants to claim a lottery prize

or a share of a lottery prize by means of fraud, deceit, or misrepresentation. Violation of § 466.308 is a second-degree felony.

50. Rook TX LP rejected the annuity option under which the \$95 million jackpot would have been paid out over 30 years in annual installments. Instead, Rook TX LP opted for a reduced one-time lump sum cash payment of \$57,804,374.

51. Defendants' illegal group purchase scheme resulted in Rook TX LP cashing in the following tickets:

Match 6	1 ticket at \$95,000,000	\$57,804,374 (lump sum)
Match 5	288 tickets at \$2,015 each	\$580,320
Match 4	16,925 tickets at \$50 each	\$846,250
Match 3	377,360 tickets at \$3 each	<u>\$1,033,086</u>
Total Won		\$60,264,030

52. By rigging the game to guarantee Defendants a win, all the Defendants violated Texas Gov't Code §466.307 which prohibits a person from intentionally or knowingly influencing or attempting to influence the selection of the winner of a lottery game. A violation of §466.307 is a second-degree felony.

53. The Ticket Retailers likewise violated Texas Government Code § 466.305, which prohibits the sale of lottery tickets on credit. Unlike standard lottery transactions, the Ticket Retailers did not collect payment for the tickets at the time of their printing. Instead, the Ticket Retailers extended credit to ColossusBets, postponing the collection of \$25.8 million from ColossusBets until after the Lotto Texas drawing was completed and the jackpot had already been won. A violation of § 466.305 is a Class C misdemeanor.

54. Between April 22, 2023, and May 17, 2023, no winning Lotto Texas tickets were sold.



55. Plaintiff Jerry Reed, like millions of other Texans, regularly played Lotto Texas using the same combination of numbers that he and his wife, Melissa, had used for many years.

56. On May 17th, Jerry Reed used that same combination of numbers and finally won the Lotto Texas jackpot, which had been reduced to \$7.5 million following the \$95 million payout on April 22nd. Tragically, Jerry's wife Melissa did not live long enough to see their years of dedication to the lottery rewarded.

57. Had the Defendants not engaged in their illegal money laundering and game-rigging scheme connected to the April 22nd draw, the \$95 million jackpot would have rolled over, as there were no other winners. Consequently, Jerry Reed's May 17th jackpot win would have been \$102.5 million instead of \$7.5 million.

#### H. COUNT I – MONEY HAD AND RECEIVED

58. Defendants hold money that, in good conscience, belongs to Plaintiff. By illegally rigging the game to win the \$95 million jackpot on March 22, 2023, Defendants reduced the size of the Lotto Texas jackpot won by Plaintiff on May 17, 2023, and therefore deprived Plaintiff of that money. Plaintiff seeks liquidated damages in the amount of at least \$95 million.

#### I. COUNT II – CONSPIRACY

59. Each of the Defendants, in combination with one another, agreed to engage in an illegal bulk purchase of Lotto Texas tickets to rig the game in their favor and to launder illicit funds. Defendants employed unlawful means, as outlined above, to accomplish their goals. Defendants intended to rig the April 22, 2023, Lotto Texas draw, depriving other players of prize money in that game and subsequent ones. To accomplish the object of their agreement, Defendants engaged in the unlawful overt acts outlined above. The agreement by Defendants to illegally rig

the April 22<sup>nd</sup> game caused injury to Plaintiff. Defendants are jointly and severally liable for the financial injury suffered by Plaintiff as a direct and proximate result of Defendants' conspiracy.

#### J. COUNT III – AIDING AND ABETTING

60. Each of the Defendants knew that the conduct outlined above was illegal. With the intent to assist one another accomplish the bulk purchase of lottery tickets through unlawful means, each of the Defendants assisted and/or encouraged one another to accomplish their unlawful methods and goal. Defendants' assistance and encouragement was a substantial factor causing harm to Plaintiff. Defendants are jointly and severally liable for the financial injury suffered by Plaintiff as a direct and proximate result of their assistance and encouragement of the unlawful methods used to accomplish a bulk purchase of lottery tickets.

#### K. COUNT IV – ASSISTING & PARTICIPATING

61. Each of the Defendants substantially assisted one another in causing the unlawful actions used to accomplish the illegal bulk purchase of lottery tickets. Each of the Defendant's assistance and participation, separate from one another's acts, breached duties owed to the lottery players of the State of Texas, including Plaintiff. Defendants' assistance & participation was a substantial factor in causing the unlawful methods used to accomplish a bulk purchase of lottery tickets. Defendants are jointly and severally liable for the financial injury suffered by Plaintiff as a direct and proximate result of Defendants' assistance & participation.

#### L. COUNT V – CONCERT OF ACTION

62. Each of the Defendants agreed with one another to engage in the unlawful acts outlined above. Defendants agreed to engage in these unlawful acts to rig the Lotto Texas game in

their favor, which was highly antisocial and likely to cause harm to the integrity and reputation of the Texas Lottery and harm to the millions of lottery players who relied upon the honesty and fairness of the Texas Lottery. Each of the Defendants' acts were intentional. Defendants' acts in carrying out the agreement caused harm to Plaintiff. Defendants are jointly and severally liable for the financial injury suffered by Plaintiff as a direct and proximate result of Defendants' concert of action.

#### M. COUNT VI – NEGLIGENCE PER SE

63. Defendants violated Texas Government Code §§ 466.155, 466.3054, 466.305, 466.307, and 466.308 as well as 16 Tex. Admin. Code §401.304. These statutes and administrative regulations aim to ensure fairness and integrity in Texas lottery games and to prevent cheating. They are designed to protect Texas lottery players like Plaintiff against the type of injury he suffered.

64. These statutes and administrative regulations are of the type that impose tort liability.

65. Defendants' violation of these statutes and administrative regulations was without legal excuse.

66. Defendants' breach of the duty imposed by these statutes and administrative regulations proximately caused injury to Plaintiff, which resulted in a \$95 million reduction in the Lotto Texas jackpot Plaintiff won on May 17, 2023.

67. Plaintiff seeks damages within the jurisdictional limits of this Court.

#### N. COUNT VII – EXEMPLARY DAMAGES

68. Plaintiff's injury resulted from Defendants' fraudulent and malicious use of unlawful means to accomplish their goal of rigging the Lotto Texas game in their favor and of laundering money, which actions entitle Plaintiff to exemplary damages under Texas Civ. Prac. & Rem. Code § 41.003(a).

#### O. REQUEST FOR DISCLOSURE

69. Under Texas Rule of Civil Procedure 194, Plaintiff requests that Defendants disclose, within 50 days of the service of this request, the information or material described in Rule 194.2.

#### P. PRAYER FOR RELIEF

70. For these reasons, Plaintiff asks that the Court issue citation for Defendants to appear and answer, and that Plaintiff be awarded a judgment against Defendants for the following:

- a. Actual damages.
- b. Exemplary damages.
- c. Prejudgment and postjudgment interest.
- d. Attorney's fees and Court costs.
- e. All other relief to which Plaintiff is entitled.

#### Q. JURY DEMAND

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

Respectfully submitted,

LAGARDE LAW FIRM, P.C.



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jeff@jeffadamslaw.com  
CO-COUNSEL FOR PLAINTIFF

# **Exhibit 10**



**VELVA L. PRICE**  
District Clerk, Travis County  
Civil Division (512) 854-9457

4/23/2025 4:22 PM  
Velva L. Price  
District Clerk  
Travis County  
D-1-GN-25-002446  
Selina Hamilton

### Process Request Form

**CASE NUMBER:** D-1-GN-25-002446

**COURT:** 353RD

**NAME(S) OF DOCUMENTS TO BE SERVED:** Plaintiff's Second Amended Petition

**FILE DATE:** 23/04/2025

Day/Month/Year

**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served- Additional Parties on page 2)

1. **Issue Service to:** BERNARD MARANTELLI

**Address of Service:** Aviation House, 125 Kingsway

**City, State & Zip:** London, WC2B 6NH United Kingdom

**Agent:** (if applicable) \_\_\_\_\_

#### TYPE OF SERVICE/PROCESS TO BE ISSUED:

- ☐ Citation ☐ Citation by Posting ☐ Citations Rule 106 Service ☒ Hague Convention Citation  
☐ Secretary of State/ Highway Commission/Commissioner of Insurance Citation  
☐ Citation by Publication: Newspaper \_\_\_\_\_  
☐ Show Cause ☐ Notice ☐ Temporary Restraining Order ☐ Temporary Protective Order  
☐ Capias ☐ Attachment ☐ Habeas Corpus  
☐ Subpoena ☐ Garnishment ☐ Injunction ☐ Sequestration ☐ Abstract ☐ Execution  
☐ Other (Please Describe) \_\_\_\_\_

#### SERVICE BY (check one):

☒ **ATTORNEY/REQUESTER:** (Email) RICHARD@LAGARDELAW.COM

☐ **PROCESS SERVER:** (Email) \_\_\_\_\_

☐ **PICK UP:** (Person/Agency Name and Phone Number) \_\_\_\_\_

☐ **TRAVIS COUNTY CONSTABLE:** Please select PCT if you have a preference ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☒ 5

☐ **CERTIFIED MAIL**

☐ **OTHER, explain:** \_\_\_\_\_

#### Requested by:

**Name:** RICHARD L. LAGARDE

**Mailing Address:** 230 Westcott St., Suite 100

**City, state, Zip:** Houston, TX 77007

**Phone Number:** (713) 993-0660

**E-mail Address:** RICHARD@LAGARDELAW.COM

**Notes/Comments to the clerk:** \_\_\_\_\_

## Civil Process Request Form - Additional Parties

---

**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served)

2. Issue Service to: ZELJKO RANOGAJEC A/K/A JOHN WILSON  
Address of Service: One, Hyde Park, 100 Knightsbridge,  
City, State & Zip: London SW1X 7LJ, United Kingdom  
Agent: (if applicable) \_\_\_\_\_
3. Issue Service to: WHITE SWAN DATA LIMITED  
Address of Service: Aviation House, 125 Kingsway  
City, State & Zip: London, WC2B 6NH United Kingdom  
Agent: (if applicable) \_\_\_\_\_
4. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_
5. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_
6. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_
7. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_



# **Exhibit 11**

353rd District Court of TRAVIS County, Texas  
PO BOX 1748 AUSTIN TX 78767

CASE #: D-1-GN-25-002446

4/29/2025 8:31 AM  
Velva L. Price  
District Clerk  
Travis County  
D-1-GN-25-002446  
Norma Ybarra

JERRY B. REED

Plaintiff

VS

ROOK TX, LP ET AL

Defendant

AFFIDAVIT OF SERVICE

I, STEPHEN WC MYERS, make statement to the fact;  
That I am a competent person more than 18 years of age or older and not a party to  
this action, nor interested in outcome of the suit. That I received the documents  
stated below on 04/16/25 5:12 pm, instructing for same to be delivered upon LOTTERY  
NOW, INC. BY DELIVERING TO REGISTERED AGENT, PARACORP INCORPORATED.

That I delivered to: LOTTERY NOW, INC. BY DELIVERING TO REGISTERED AGENT, PARACORP  
INCORPORATED. By Delivering to Steve Zenoveff, Account Executive

the following : CITATION; PLAINTIFF'S ORIGINAL PETITION

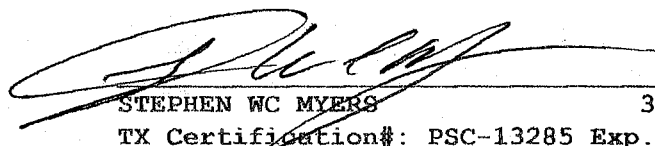
at this address : 14001 W HWY 29 STE 102  
Liberty Hill, Williamson County, TX 78642

Manner of Delivery : By PERSONALLY delivering the document(s) to the person above.

Delivered on : Wednesday April 23, 2025 2:30 pm

My name is STEPHEN WC MYERS, my date of birth is August 10th, 1986, and my address  
is P.O. Box 11138, Killeen, TX 76547, U.S.A. I declare under penalty of perjury that  
the foregoing is true and correct.

Executed in Bell, County, State of Texas, on the 23rd day of April, 2025.

  
STEPHEN WC MYERS  
TX Certification#: PSC-13285 Exp. 12/31/2025

3170 Declarant

Service Fee: 95.00 PCP Inv#: A25404371



CITATION  
THE STATE OF TEXAS  
CAUSE NO. D-1-GN-25-002446

JERRY B REED

, PLAINTIFF(S)

vs.

ROOK TX LP; ROOK GP, LLC; LOTTERY.COM, INC; AUTOLOTTO, INC; LOTTERY NOW, INC;  
COLOSSUS BETS LIMITED; ALTX MANAGEMENT, LLC; QAWI AND QUDDUS, INC; LAWRENCE  
ANTHONY DIMATTEO, III; MATTHEW CLEMENSON; RYAN DICKINSON

, DEFENDANT(S)

TO: **LOTTERY NOW, INC**  
**BY SERVING ITS REGISTERED AGENT PARACORP INCORPORATED**  
**14001 W HWY 29 STE 102**  
**LIBERTY HILL TX 78642**

Defendant, in the above styled and numbered cause:

**YOU HAVE BEEN SUED.** You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at [TexasLawHelp.org](http://TexasLawHelp.org)."

Attached is a copy of the **PLAINTIFF'S ORIGINAL PETITION** in the above styled and numbered cause, which was filed on **APRIL 08, 2025** in the **353RD DISTRICT COURT** of Travis County, Austin, Texas.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office, **APRIL 14, 2025**

REQUESTED BY:  
**RICHARD L LAGARDE**  
**230 WESTCOTT ST, SUITE 100**  
**HOUSTON, TX 77007**



*[Signature]*  
Velva L Price  
Travis County District Clerk  
Civil Family Court Facility (CFCF)  
1700 Guadalupe Street, P.O. Box 679003 (78787)  
Austin TX 78701

**Selina Hamilton, Deputy**

**R E T U R N**

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock \_\_\_\_\_ M., and executed at \_\_\_\_\_ within the County of \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_\_ M., by delivering to the within named \_\_\_\_\_, each in person, a true copy of this citation together with the **PLAINTIFF'S ORIGINAL PETITION** accompanying pleading, having first attached such copy of such citation to such copy of pleading and endorsed on such copy of citation the date of delivery.

Service Fee: \$ \_\_\_\_\_

\_\_\_\_\_  
Sheriff / Constable / Authorized Person

Sworn to and subscribed before me this the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

By: \_\_\_\_\_

\_\_\_\_\_  
Printed Name of Server

\_\_\_\_\_  
Notary Public, THE STATE OF TEXAS  
**D-1-GN-25-002446**

\_\_\_\_\_  
County, Texas

**SERVICE FEE NOT PAID**

353rd District Court of TRAVIS County, Texas  
PO BOX 1748 AUSTIN TX 78767

CASE #: D-1-GN-25-002446

JERRY B. REED

Plaintiff

VS

ROOK TX, LP ET AL

Defendant

AFFIDAVIT OF SERVICE

I, STEPHEN WC MYERS, make statement to the fact;  
That I am a competent person more than 18 years of age or older and not a party to  
this action, nor interested in outcome of the suit. That I received the documents  
stated below on 04/16/25 5:12 pm, instructing for same to be delivered upon LOTTERY  
NOW, INC. BY DELIVERING TO REGISTERED AGENT, PARACORP INCORPORATED.

That I delivered to: LOTTERY NOW, INC. BY DELIVERING TO REGISTERED AGENT, PARACORP  
INCORPORATED. By Delivering to Steve Zenoveff, Account Executive

the following : CITATION; PLAINTIFF'S ORIGINAL PETITION

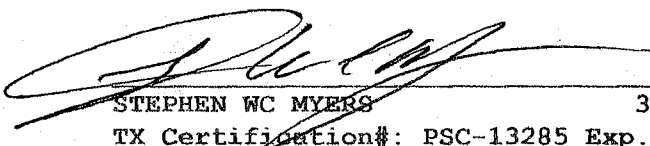
at this address : 14001 W HWY 29 STE 102  
Liberty Hill, Williamson County, TX 78642

Manner of Delivery : By PERSONALLY delivering the document(s) to the person above.

Delivered on : Wednesday April 23, 2025 2:30 pm

My name is STEPHEN WC MYERS, my date of birth is August 10th, 1986, and my address  
is P.O. Box 11138, Killeen, TX 76547, U.S.A. I declare under penalty of perjury that  
the foregoing is true and correct.

Executed in Bell, County, State of Texas, on the 23rd day of April, 2025.

  
STEPHEN WC MYERS  
TX Certification#: PSC-13285 Exp. 12/31/2025

3170 Declarant



Service Fee: 95.00 PCP Inv#: A25404371

# **Exhibit 12**



**VELVA L. PRICE**  
District Clerk, Travis County  
Civil Division (512) 854-9457

4/30/2025 3:50 PM  
Velva L. Price  
District Clerk  
Travis County  
D-1-GN-25-002446  
Selina Hamilton

### Process Request Form

**CASE NUMBER:** D-1-GN-25-002446

**COURT:** 353RD

**NAME(S) OF DOCUMENTS TO BE SERVED:** Plaintiff's Second Amended Petition

**FILE DATE:** 30/04/2025

Day/Month/Year

**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served- Additional Parties on page 2)

1. **Issue Service to:** QAWI AND QUDDUS, INC.

**Address of Service:** 921 Villa Rialto Vw

**City, State & Zip:** Austin, TX 78717

**Agent: (if applicable)** Nadirshah Ali

#### TYPE OF SERVICE/PROCESS TO BE ISSUED:

- ☒ Citation ☐ Citation by Posting ☐ Citations Rule 106 Service ☐ Hague Convention Citation  
☐ Secretary of State/ Highway Commission/Commissioner of Insurance Citation  
☐ Citation by Publication: Newspaper \_\_\_\_\_  
☐ Show Cause ☐ Notice ☐ Temporary Restraining Order ☐ Temporary Protective Order  
☐ Capias ☐ Attachment ☐ Habeas Corpus  
☐ Subpoena ☐ Garnishment ☐ Injunction ☐ Sequestration ☐ Abstract ☐ Execution  
☐ Other (Please Describe) \_\_\_\_\_

#### SERVICE BY (check one):

☒ **ATTORNEY/REQUESTER:** (Email) RICHARD@LAGARDELAW.COM

☐ **PROCESS SERVER:** (Email) \_\_\_\_\_

☐ **PICK UP:** (Person/Agency Name and Phone Number) \_\_\_\_\_

☐ **TRAVIS COUNTY CONSTABLE:** Please select PCT if you have a preference ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☒ 5

☐ **CERTIFIED MAIL**

☐ **OTHER, explain:** \_\_\_\_\_

#### Requested by:

**Name:** RICHARD L. LAGARDE

**Mailing Address:** 230 Westcott St., Suite 100

**City, state, Zip:** Houston, TX 77007

**Phone Number:** (713) 993-0660

**E-mail Address:** RICHARD@LAGARDELAW.COM

**Notes/Comments to the clerk:** \_\_\_\_\_

## Civil Process Request Form - Additional Parties

---

**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served)

2. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

3. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

4. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

5. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

6. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

7. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

# **Exhibit 13**





**VELVA L. PRICE**  
District Clerk, Travis County  
Civil Division (512) 854-9457

5/2/2025 10:53 AM  
Velva L. Price  
District Clerk  
Travis County  
D-1-GN-25-002446  
Selina Hamilton

### Process Request Form

**CASE NUMBER:** D-1-GN-25-002446

**COURT:** 353RD

**NAME(S) OF DOCUMENTS TO BE SERVED:** Plaintiff's Second Amended Petition

**FILE DATE:** 30/04/2025

Day/Month/Year

**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served- Additional Parties on page 2)

1. **Issue Service to:** QAWI AND QUDDUS, INC.

**Address of Service:** 921 Villa Rialto Vw

**City, State & Zip:** Leander, TX 78641

**Agent: (if applicable)** Nadirshah Ali

#### TYPE OF SERVICE/PROCESS TO BE ISSUED:

- ☒ Citation ☐ Citation by Posting ☐ Citations Rule 106 Service ☐ Hague Convention Citation  
☐ Secretary of State/ Highway Commission/Commissioner of Insurance Citation  
☐ Citation by Publication: Newspaper \_\_\_\_\_  
☐ Show Cause ☐ Notice ☐ Temporary Restraining Order ☐ Temporary Protective Order  
☐ Capias ☐ Attachment ☐ Habeas Corpus  
☐ Subpoena ☐ Garnishment ☐ Injunction ☐ Sequestration ☐ Abstract ☐ Execution  
☐ Other (Please Describe) \_\_\_\_\_

#### SERVICE BY (check one):

☒ **ATTORNEY/REQUESTER:** (Email) RICHARD@LAGARDELAW.COM

☐ **PROCESS SERVER:** (Email) \_\_\_\_\_

☐ **PICK UP:** (Person/Agency Name and Phone Number) \_\_\_\_\_

☐ **TRAVIS COUNTY CONSTABLE:** Please select PCT if you have a preference ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☒ 5

☐ **CERTIFIED MAIL**

☐ **OTHER, explain:** \_\_\_\_\_

#### Requested by:

**Name:** RICHARD L. LAGARDE

**Mailing Address:** 230 Westcott St., Suite 100

**City, state, Zip:** Houston, TX 77007

**Phone Number:** (713) 993-0660

**E-mail Address:** RICHARD@LAGARDELAW.COM

**Notes/Comments to the clerk:** \_\_\_\_\_

## Civil Process Request Form - Additional Parties

---

**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served)

2. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

3. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

4. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

5. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

6. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

7. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

# **Exhibit 14**



**VELVA L. PRICE**  
District Clerk, Travis County  
Civil Division (512) 854-9457

5/6/2025 1:22 PM  
Velva L. Price  
District Clerk  
Travis County  
D-1-GN-25-002446  
Selina Hamilton

### Process Request Form

**CASE NUMBER:** D-1-GN-25-002446

**COURT:** 353RD

**NAME(S) OF DOCUMENTS TO BE SERVED:** Plaintiff's Second Amended Petition

**FILE DATE:** 06/05/2025

Day/Month/Year

**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served- Additional Parties on page 2)

1. **Issue Service to:** Ryan Dickinson

**Address of Service:** 6000 Ed Bluestein Blvd., Apt. 10104

**City, State & Zip:** Austin, TX 78723

**Agent:** (if applicable) \_\_\_\_\_

#### TYPE OF SERVICE/PROCESS TO BE ISSUED:

- ☒ Citation ☐ Citation by Posting ☐ Citations Rule 106 Service ☐ Hague Convention Citation  
☐ Secretary of State/ Highway Commission/Commissioner of Insurance Citation  
☐ Citation by Publication: Newspaper \_\_\_\_\_  
☐ Show Cause ☐ Notice ☐ Temporary Restraining Order ☐ Temporary Protective Order  
☐ Capias ☐ Attachment ☐ Habeas Corpus  
☐ Subpoena ☐ Garnishment ☐ Injunction ☐ Sequestration ☐ Abstract ☐ Execution  
☐ Other (Please Describe) \_\_\_\_\_

#### SERVICE BY (check one):

☒ **ATTORNEY/REQUESTER:** (Email) RICHARD@LAGARDELAW.COM

☐ **PROCESS SERVER:** (Email) \_\_\_\_\_

☐ **PICK UP:** (Person/Agency Name and Phone Number) \_\_\_\_\_

☐ **TRAVIS COUNTY CONSTABLE:** Please select PCT if you have a preference ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☒ 5

☐ **CERTIFIED MAIL**

☐ **OTHER, explain:** \_\_\_\_\_

#### Requested by:

**Name:** RICHARD L. LAGARDE

**Mailing Address:** 230 Westcott St., Suite 100

**City, state, Zip:** Houston, TX 77007

**Phone Number:** (713) 993-0660

**E-mail Address:** RICHARD@LAGARDELAW.COM

**Notes/Comments to the clerk:** \_\_\_\_\_

## Civil Process Request Form - Additional Parties

---

**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served)

2. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

3. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

4. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

5. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

6. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

7. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

# **Exhibit 15**



**VELVA L. PRICE**  
District Clerk, Travis County  
Civil Division (512) 854-9457

5/7/2025 1:44 PM  
Velva L. Price  
District Clerk  
Travis County  
D-1-GN-25-002446  
Selina Hamilton

### Process Request Form

**CASE NUMBER:** D-1-GN-25-002446

**COURT:** 353RD

**NAME(S) OF DOCUMENTS TO BE SERVED:** Plaintiff's Second Amended Petition

**FILE DATE:** 07/05/2025

Day/Month/Year

**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served- Additional Parties on page 2)

1. **Issue Service to:** BERNARD MARANTELLI

**Address of Service:** Aviation House, 125 Kingsway

**City, State & Zip:** London, WC2B 6NH United Kingdom, or wherever he may be found.

**Agent:** (if applicable) \_\_\_\_\_

#### TYPE OF SERVICE/PROCESS TO BE ISSUED:

- ☒ Citation   ☐ Citation by Posting   ☐ Citations Rule 106 Service   ☐ Hague Convention Citation  
☐ Secretary of State/ Highway Commission/Commissioner of Insurance Citation  
☐ Citation by Publication: Newspaper \_\_\_\_\_  
☐ Show Cause   ☐ Notice   ☐ Temporary Restraining Order   ☐ Temporary Protective Order  
☐ Capias   ☐ Attachment   ☐ Habeas Corpus  
☐ Subpoena   ☐ Garnishment   ☐ Injunction   ☐ Sequestration   ☐ Abstract   ☐ Execution  
☐ Other (Please Describe) \_\_\_\_\_

#### SERVICE BY (check one):

☒ **ATTORNEY/REQUESTER:** (Email) RICHARD@LAGARDELAW.COM

☐ **PROCESS SERVER:** (Email) \_\_\_\_\_

☐ **PICK UP:** (Person/Agency Name and Phone Number) \_\_\_\_\_

☐ **TRAVIS COUNTY CONSTABLE:** Please select PCT if you have a preference   ☐ 1   ☐ 2   ☐ 3   ☐ 4   ☒ 5

☐ **CERTIFIED MAIL**

☐ **OTHER, explain:** \_\_\_\_\_

#### Requested by:

**Name:** RICHARD L. LAGARDE

**Mailing Address:** 230 Westcott St., Suite 100

**City, state, Zip:** Houston, TX 77007

**Phone Number:** (713) 993-0660

**E-mail Address:** RICHARD@LAGARDELAW.COM

**Notes/Comments to the clerk:** \_\_\_\_\_

## Civil Process Request Form - Additional Parties

---

**SERVICE TO BE ISSUED ON:** (Please List Exactly As The Name Appears In The Pleading To Be Served)

2. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

3. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

4. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

5. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

6. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_

7. Issue Service to: \_\_\_\_\_  
Address of Service: \_\_\_\_\_  
City, State & Zip: \_\_\_\_\_  
Agent: (if applicable) \_\_\_\_\_



### Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Kathleen Laird on behalf of Kathleen Laird

Bar No. 24132063

kathleen.laird@lockelord.com

Envelope ID: 100667050

Filing Code Description: Notice of Removal to Business Court

Filing Description: Rook TX LP and Rook GP LLC's Notice of Removal to Business Court

Status as of 5/9/2025 3:50 PM CST

#### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jeff Adams		jeff@jeffadamslaw.com	5/9/2025 3:34:09 PM	SENT
Mary LaGarde		mary@lagardelaw.com	5/9/2025 3:34:09 PM	SENT
Bradden Pippin		bradden.pippin@troutman.com	5/9/2025 3:34:09 PM	SENT
Kathleen CurtisLaird		kathleen.laird@troutman.com	5/9/2025 3:34:09 PM	SENT
Mia Lorick		mia.lorick@troutman.com	5/9/2025 3:34:09 PM	SENT
David Harrell		david.harrell@troutman.com	5/9/2025 3:34:09 PM	SENT
Manfred Sternberg		manfred@msternberg.com	5/9/2025 3:34:09 PM	SENT
Richard LaGarde		richard@lagardelaw.com	5/9/2025 3:34:09 PM	SENT