

## SCHEDULE A: PLAINTIFF'S CLAIM

1. The Plaintiff, Matthew Daniel Buchalter (“Matthew”), is an Ontario resident and account holder with the Defendant’s Caesars Sportsbook product.
2. The Defendant, American Wagering Inc. (“Caesars”), is a Nevada-based corporation licensed by the Alcohol and Gaming Commission of Ontario to operate in Ontario as an internet gaming supplier with the brand name Caesars Sportsbook.
3. Matthew placed a number of wagers with Caesars for the 2022-23 National Football League regular season. The wagers at issue in this dispute, totaling \$2,300, relate to the record of three NFL teams – the Indianapolis Colts, Buffalo Bills and Cincinnati Bengals - would have over the course of the season.
4. As discussed further below, Caesars’ treatment of these wagers was inconsistent with each other and with applicable terms and conditions (the “**House Rules**”). As a consequence, Caesars has breached its contract with Matthew and been unjustly enriched. Specifically, Caesars has retained the wagers made by Matthew and refused to honor the terms of those wagers resulting in an undue gain to Caesars. Matthew has suffered the reciprocal and consequential loss. There is no juristic reason for Caesars’ unjust enrichment.
5. Matthew’s wagers that are at issue in this dispute are:

	Bet	Amount	Bet Slip
a.	Indianapolis Colts, best regular season record	\$500	<b>APPENDIX 1.1</b>
b.	Buffalo under 10.5 wins	\$500	<b>APPENDIX 1.2</b>
c.	Buffalo under 10.5 wins	\$1,000	<b>APPENDIX 1.3</b>
d.	Buffalo exactly 15 wins	\$50	<b>APPENDIX 1.4</b>
e.	Buffalo exactly 16 wins	\$50	<b>APPENDIX 1.5</b>
f.	Cincinnati exactly 13 wins	\$50	<b>APPENDIX 1.6</b>
g.	Cincinnati exactly 14 wins	\$50	<b>APPENDIX 1.7</b>
h.	Cincinnati exactly 15 wins	\$50	<b>APPENDIX 1.8</b>
i.	Cincinnati exactly 16 wins	\$50	<b>APPENDIX 1.9</b>

6. On January 2, 2023, the National Football League game between the Buffalo Bills and the Cincinnati Bengals was postponed after 9 minutes and 2 seconds of playing time following a serious on-field medical emergency involving a player.
7. On January 5, 2023, the National Football League announced that the game would not be resumed or rescheduled, that the results of the incomplete game from January 2 would be voided, and that Buffalo and Cincinnati would each play 16 games during the 2022-23 regular season instead of the originally scheduled 17 games.

8. The 2022-23 National Football League regular season concluded with official standings of:

- a. 13 wins, 3 losses and 0 ties for the Buffalo Bills; and
- b. 12 wins, 4 losses and 0 ties for the Cincinnati Bengals

(see **APPENDIX 2**)

9. Per Caesars' own terms and conditions, all nine wagers described in paragraph 5 should be settled as "VOID" and that Caesars is liable to Matthew in the amount of \$2,250, calculated as \$2,300 total bet amount less \$50 refund received for one voided wager.

10. For the wagers in rows b, c, d, e, f, g, h and i described in paragraph 5, above, the condition "Must play 17 games for action" is explicitly present on the bet slip. In the wagering industry, "action" is a term widely understood to mean "valid"; wagers that are not deemed "action" are void with the bet amount refunded to the bettor.

11. Instead of VOIDING the wagers in the paragraphs mentioned above, Caesars settled the wagers in paragraph 5 such that three wagers in rows a, b, c, d, e, g, h and i described in paragraph 5, above, were settled as "LOSS". As such, the wagers were retained by Caesars. These settlements are shown on the bet slips in **APPENDIX 1**.

12. The wager in row f of paragraph 5 was settled as "VOID" and the bet amount of \$50 was refunded to Matthew's account. Had the teams completed their full schedule, the wager would have had an opportunity to win, if the Cincinnati Bengals had won their one remaining game. In this event, the wager would have returned a payout of \$2,050. The other wagers listed in paragraph 5 would have lost regardless of the outcome of the missing game.

13. As such, in the one instance where Matthew could have won the wager, Caesars ruled the wager as VOID. It ruled the others as LOSS.

14. Caesars' House Rules for Football wagers are included in their entirety as **APPENDIX 3**. The relevant sections are:

a. Regular Season Team Win Totals section, clause 1: "For regular season win totals, team must play all scheduled games for action, unless otherwise stated."

*The wagers in paragraphs 3.b, 3.c, 3.d, 3.e, 3.f, 3.g, 3.h and 3.i are for regular season win totals. These wagers were marked as losses despite all scheduled games not being played. These wagers should have been marked as VOID.*

b. Regular Season Team Futures Markets section, clause 1: "For regular-season team futures markets, teams must play all scheduled regular season games for action."

*The wager in paragraph 3.a is for regular season team futures. Even though the specific team covered by the wager in paragraph 3.a did play all scheduled regular season games, the scope of the wager includes every National Football League team as the*

*wager was on which team would finish with the best record. It is clear from the phrase “teams must play” that the clause refers to all teams in the league, comparing to the clause referenced in Paragraph 12 which contains the phrase “team must play”.*

*As all teams did not play all scheduled regular season games, this wager should have been marked as VOID.*

c. General Rules section, clause 3: “Bets for all markets stand provided at least 55 minutes of play have taken place and an official result is declared unless a result has already been established. If a game is postponed, the game must be played within 7 days of the original scheduled date or bets are void. The exception being the final/championship of a competition, in which case all bets stand for the rescheduled game.”

*These conditions were not met for the bets at issue, which should have all been marked as VOID.*

15. On January 11, 2023, Matthew contacted Caesars via Twitter direct message to the @CaesarsHelp account to ask for an explanation of why the wagers were settled the way they were. Caesars responded “All of the wagers that are effected (sic) by the game not being played on Monday night of week 17 will be graded accordingly. If a market is decided it will be graded accordingly.”

16. On January 11, 2023, Matthew received an email from Caesars’ customer service agent named “Dontavius”. That email is attached as **APPENDIX 4**. In it, Caesars refers to the two wagers identified in rows b and c in the chart in paragraph 5 above and promises to return the funds from those wagers back to Matthew’s account. The promised refunds did not occur.

17. On January 12, 2023, Matthew received a phone call from Caesars’ customer service agent Ryan, phone number 725-223-0542. Ryan explained that Caesars had decided to settle all bets where the outcome was “a mathematical certainty” as wins and losses, and to void all bets where the outcome was not “a mathematical certainty”. Matthew did not have any wagers that qualified to be settled as wins per this decision, only losses and a single void. Matthew advised Ryan of the bet conditions and relevant House Rules. Ryan responded that it was a “management decision” and there was nothing he could do.

18. Caesars’ actions directly violate the House Rules listed in paragraph 14, above. There are no House Rules which mention “mathematical certainty”.

19. On January 12, 2023, Matthew initiated a formal dispute with iGaming Ontario, the lottery subsidiary of the Alcohol and Gaming Commission of Ontario presumptively responsible for the conduct and management of schemes prescribed by the iGO Regulation (Ont. Reg. 722/21), including Caesars’ operations in Ontario.

20. On February 3, 2023, Matthew received email correspondence from iGaming Ontario, included as **APPENDIX 5**, whereby Matthew’s complaint was rejected under the grounds of the

General Rules section, Clause 3: “Bets for all markets stand provided at least 55 minutes of play have taken place and an official result is declared unless a result has already been established. If a game is postponed, the game must be played within 7 days of the original scheduled date or bets are void. The exception being the final/championship of a competition, in which case all bets stand for the rescheduled game.”

21. While not determinative in any way of this dispute, iGaming Ontario’s decision involved palpable and overriding errors, including because:

a. The game between the Buffalo Bills and Cincinnati Bengals was postponed before being cancelled and the game was not played within 7 days of the original scheduled date; (**APPENDIX 6**)

b. The “55 minutes of play” rule is common in the context of single game bets. A standard football game contains 60 minutes of play, and the 55 minute rule is common throughout the industry to settle single-game bets for games that are interrupted for reasons such as what happened on January 2. This rule would have been correctly applied to void single-game bets on the January 2 game specifically as only 9 minutes of that game were played. The 55 minute rule was obviously intended to apply to single-game bets and not to season-long bets. Any construction of the House Rules relying on the 55 minute rule is inconsistent with a harmonious reading of all terms of the House Rules and results in a commercially absurd result; and

c. the “55 minutes of play” rule is contained in the General section of the Football betting house rules, and it is in direct contradiction with more specific rules found both in the Regular Season Team Futures and Regular Season Team Win Totals sections, as well as on the bet slips themselves. Thus, iGaming Ontario’s obviously incorrect position is that in the event of a contradiction within the House Rules that a more general provision should override a specific one.

22. Matthew hereby requests that this Honourable Court interpret the House Rules harmoniously with their purpose, each other and common sense. In addition to granting Matthew judgment for the improperly settled wagers, Matthew hereby requests payment for the costs of preparing the Plaintiff’s Claim, the costs of effecting service, compensation for inconvenience and expense or a representation fee as may be applicable and all other applicable costs and disbursements available at law.

23. This Honourable Court should also penalize Caesars for acting unreasonable and order a payable penalty consistent with Rule 19.06 of the *Rules of the Small Claims Court*. Caesars is a multi-national sportsbook that has knowingly contravened its own House Rules and the judgment of its employees under the guise of a “management decision”. As a new entrant in the Ontario gaming market, the court should send a clear signal that Caesars must honour its agreements with Ontario betters.

**APPENDIX 1: Bet Slips from Wagers Placed**

APPENDIX 1.1:

**LOST**

**STRAIGHT**



Indianapolis Colts | Best Regular Season Record

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**INDIANAPOLIS COLTS**

**+2500**

NFL Best Regular Season Record

2022 Best Regular Season Record (Dead Heat Rules Apply)  
Dec 4 | 1:00pm

*Reward Credits and Tier Credits cannot be displayed.*

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Wager: **\$500.00**

Odds: **+2500**

Paid Out: **\$0.00**

ref: 4557f390 | Jul 07, 2022 @ 11:41am

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APPENDIX 1.2:

**LOST**

**STRAIGHT**



Under 10.5 | Alternate Regular Season Wins 1

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**UNDER 10.5**

**+230**

NFL Alternate Regular Season Wins 1

Buffalo Bills 2022/23 Season (Must Play 17 Games For Action)

Dec 24 | 1:00pm

*Reward Credits and Tier Credits cannot be displayed.*

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Wager: **\$500.00**

Odds: **+230**

Paid Out: **\$0.00**

ref: eaf7d1b0 | Jun 26, 2022 @ 5:06pm

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**LOST**

**STRAIGHT**



Under 10.5 | Alternate Regular Season Wins 1

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**UNDER 10.5**

**+230**

NFL Alternate Regular Season Wins 1

Buffalo Bills 2022/23 Season (Must Play 17 Games For Action)  
Dec 24 | 1:00pm

*Reward Credits and Tier Credits cannot be displayed.*

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Wager: **\$1,000.00**

Odds: **+230**

Paid Out: **\$0.00**

ref: ce4fffe0 | Aug 22, 2022 @ 3:58pm

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**LOST**

**STRAIGHT**



15 | Exact Regular Season Win Total

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**15**

**+4000**

NFL Exact Regular Season Win Total

Buffalo Bills 2022/23 Season (Must Play 17 Games For Action)  
Dec 24 | 1:00pm

*Reward Credits and Tier Credits cannot be displayed.*

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Wager: **\$50.00**

Odds: **+4000**

Paid Out: **\$0.00**

ref: 4d286700 | Jun 26, 2022 @ 8:44pm

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**LOST**

**STRAIGHT**



16 | Exact Regular Season Win Total

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**16**

**+7500**

NFL Exact Regular Season Win Total

Buffalo Bills 2022/23 Season (Must Play 17 Games For Action)  
Dec 24 | 1:00pm

*Reward Credits and Tier Credits cannot be displayed.*

---

Wager: **\$50.00**

Odds: **+7500**

Paid Out: **\$0.00**

ref: 4d5f5580 | Jun 26, 2022 @ 8:44pm

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VOID

**STRAIGHT**



13 | Exact Regular Season Win Total

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**13**

**+4000**

NFL Exact Regular Season Win Total

Cincinnati Bengals 2022/23 Season (Must Play 17 Games For Action)  
Dec 24 | 1:00pm

*Reward Credits and Tier Credits cannot be displayed.*

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Wager: **\$50.00**

Odds: **+4000**

Paid Out: **\$50.00**

ref: 30d18320 | Jun 26, 2022 @ 9:19pm

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LOST

**STRAIGHT**



14 | Exact Regular Season Win Total

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**14**

**+6000**

NFL Exact Regular Season Win Total

Cincinnati Bengals 2022/23 Season (Must Play 17 Games For Action)  
Dec 24 | 1:00pm

*Reward Credits and Tier Credits cannot be displayed.*

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Wager: **\$50.00**

Odds: **+6000**

Paid Out: **\$0.00**

ref: 3f756040 | Jun 26, 2022 @ 9:19pm

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LOST

**STRAIGHT**



15 | Exact Regular Season Win Total

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**15**

**+15000**

NFL Exact Regular Season Win Total

Cincinnati Bengals 2022/23 Season (Must Play 17 Games For Action)  
Dec 24 | 1:00pm

*Reward Credits and Tier Credits cannot be displayed.*

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Wager: **\$50.00**

Odds: **+15000**

Paid Out: **\$0.00**

ref: 3f756041 | Jun 26, 2022 @ 9:19pm

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**LOST**

**STRAIGHT**



16 | Exact Regular Season Win Total

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**16**

**+50000**

NFL Exact Regular Season Win Total

Cincinnati Bengals 2022/23 Season (Must Play 17 Games For Action)  
Dec 24 | 1:00pm

*Reward Credits and Tier Credits cannot be displayed.*

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Wager: **\$50.00**

Odds: **+50000**

Paid Out: **\$0.00**

ref: 3f756042 | Jun 26, 2022 @ 9:19pm

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## APPENDIX 2: Official NFL Final Standings, 2022-23 Regular Season

Accessed Feb 6, 2023 from <https://www.nfl.com/standings/>

The screenshot shows the NFL website's standings page for the 2022-23 Regular Season. The page is titled "2022 NFL Division Standings" and is accessed from "nfl.com/standings/". The interface includes filters for "DIVISION", "CONFERENCE", and "LEAGUE", and dropdown menus for "YEAR" (2022) and "SEASON" (Regular season). The main content displays the "AMERICAN FOOTBALL CONFERENCE" standings, organized into three divisions: AFC EAST, AFC NORTH, and AFC SOUTH. Each division's table lists the teams, their win-loss-tie records, percentage of games won (PCT), points for (PF) and against (PA), net points, home and road records, division record, conference record, non-conference record, streak, and last five games.

AMERICAN FOOTBALL CONFERENCE																
AFC EAST	W	L	T	PCT	PF	PA	Net Pts	Home	Road	Div	Pct	Conf	Pct	Non-Conf	Strk	Last 5
Buffalo Bills <sup>xz</sup>	13	3	0	0.813	455	286	169	7-1-0	6-2-0	4-2-0	0.667	9-2-0	0.818	4-1-0	7W	5-0-0
Miami Dolphins <sup>x</sup>	9	8	0	0.529	397	399	-2	6-2-0	3-6-0	3-3-0	0.500	7-5-0	0.583	2-3-0	1W	1-4-0
New England Patriots	8	9	0	0.471	364	347	17	4-4-0	4-5-0	3-3-0	0.500	6-6-0	0.500	2-3-0	1L	2-3-0
New York Jets	7	10	0	0.412	296	316	-20	3-5-0	4-5-0	2-4-0	0.333	5-7-0	0.417	2-3-0	6L	0-5-0
AFC NORTH	W	L	T	PCT	PF	PA	Net Pts	Home	Road	Div	Pct	Conf	Pct	Non-Conf	Strk	Last 5
Cincinnati Bengals <sup>xz</sup>	12	4	0	0.750	418	322	96	6-1-0	6-3-0	3-3-0	0.500	8-3-0	0.727	4-1-0	8W	5-0-0
Baltimore Ravens <sup>x</sup>	10	7	0	0.588	350	315	35	5-3-0	5-4-0	3-3-0	0.500	6-6-0	0.500	4-1-0	2L	2-3-0
Pittsburgh Steelers	9	8	0	0.529	308	346	-38	4-4-0	5-4-0	3-3-0	0.500	5-7-0	0.417	4-1-0	4W	4-1-0
Cleveland Browns	7	10	0	0.412	361	381	-20	4-4-0	3-6-0	3-3-0	0.500	4-8-0	0.333	3-2-0	1L	2-3-0
AFC SOUTH	W	L	T	PCT	PF	PA	Net Pts	Home	Road	Div	Pct	Conf	Pct	Non-Conf	Strk	Last 5
Jacksonville Jaguars <sup>xz</sup>	9	8	0	0.529	404	350	54	5-3-0	4-5-0	4-2-0	0.667	8-4-0	0.667	1-4-0	5W	5-0-0
Tennessee Titans	7	10	0	0.412	298	359	-61	3-5-0	4-5-0	3-3-0	0.500	5-7-0	0.417	2-3-0	7L	0-5-0
Indianapolis Colts	4	12	1	0.265	289	427	-138	2-6-0	2-6-1	1-4-1	0.250	4-7-1	0.375	0-5-0	7L	0-5-0
Houston Texans	3	13	1	0.206	289	420	-131	0-7-1	3-6-0	3-2-1	0.583	3-8-1	0.292	0-5-0	1W	2-3-0
AFC WEST	W	L	T	PCT	PF	PA	Net Pts	Home	Road	Div	Pct	Conf	Pct	Non-Conf	Strk	Last 5

## **APPENDIX 3: Caesars Sportsbook House Rules for Football Bets**

Accessed Feb 6 2023 from <https://caesars.com/sportsbook-and-casino/on/support/house-rules/>

Relevant sections have been highlighted for ease of reference.

### **Football**

#### General Rules

1. Overtime counts unless specified otherwise. For example, overtime will not count in any bets involving specific halves and quarters.
2. For game and season-long player wagers, player must play in a game for a wager to be action. If the named player does not play, the wager will be void.
3. Bets for all markets stand provided at least 55 minutes of play have taken place and an official result is declared unless a result has already been established. If a game is postponed, the game must be played within 7 days of the original scheduled date or bets are void. The exception being the final/championship of a competition, in which case all bets stand for the rescheduled game.
4. If there is a change of venue for an event, for any reason, bets placed on this event prior to the location change announcement will be void.
5. Unless a price is quoted for a tie, any market where the result is a tie will be void.
6. Bets on teams to win divisions, conferences or competitions will be settled on the official standings immediately after the division, conference or competition winner has clinched and any subsequent amendments to the result will not affect bets.

#### Player Props

1. Player must play in listed game for action.

#### Same-Game Parlay Rules

6. If any leg of a Same-Game Parlay bet relates to an existing market on site, rules for that market will apply. For example, if a Same-Game Parlay bet includes a player to score an anytime touchdown & the selected player's only touchdown scored is as a passer, this bet will be graded a loser because the Anytime Touchdown Scorer rules do not include touchdowns scored as a passer.
7. If any leg of the Same-Game Parlay bet is made void, then the whole bet would become void. The exception to this is if the outcome of the bet requested can still happen.
8. A Same-Game Parlay bet may contain up to 10 legs. Same-Game Parlays do not support wagers with more than 10 legs.
9. A Same-Game Parlay bet must be placed from a single game. Same-Game Parlay wagers cannot be combined across multiple games.
10. If part of the bet requested consists of one of two named players to score at any time during a game, bets placed on that market will stand if one or both of those players play any part in that game.

#### Money Line

1. Predict the team that will win the game.
2. Overtime counts.

#### Point Spread

1. Predict the team that will win the game after the point spread has been applied to the actual scores.
2. Overtime counts.

#### Total Points

1. Predict whether the total number of points, including those scored in overtime, is more or less than a specified figure.

#### Total Points Odd/Even

1. Predict whether the total points scored in the game will be odd or even.
2. Points scored in overtime count.

#### Winning Margin

1. Predict the team to win the game and the margin of victory.
2. Overtime counts.

#### Half Winning Margin/Live

1. Predict the margin of points by which a nominated team will win a half. Example: if the second half score is New England Patriots 28 - Atlanta Falcons 14, then the winning margin will be 'New England Patriots 13-18 points'. This only applies to points scored during the given time period and not the entire game.
2. Overtime counts.

#### Team Halves Won/Live

1. Predict total amount of halves a team wins in a game.
2. Overtime does not count unless otherwise stated.

#### Result After Quarter/Live

1. Predict which team will be winning after the culmination of the stated quarter.
2. Overtime counts.

#### First Touchdown Scorer

1. Predict the first player to score a touchdown in the game.
2. Overtime counts and bets on players who are 'suited up' and ready to play will count. Bets placed on any player not 'suited up' will be void.
3. If no touchdowns are scored, stakes will be lost unless no first touchdown scorer is selected.

#### Pro Football Championship Outright Winner

1. Predict the team that will win the Pro Football Championship.
2. Bets settled on the official standings immediately after the competition has been played and any subsequent amendments to the result will not affect bets.

#### First Scoring Play

1. Predict the first scoring play in the game.

#### A Score in the Final 2 Minutes of the First Half

1. Predict whether there will be a point scored in the final two minutes of the first half.

#### First Half Betting

1. Predict the result at half time.
2. The first half must be completed for bets to stand.

#### First Half Spread

1. Predict the result at halftime once the point spread has been applied to the actual scores.
2. The first half must be completed for bets to stand.



#### First Half Total Points

1. Predict whether the total points scored at halftime will be more or less than a specified figure.
2. The first half must be completed for bets to stand unless a winning market has already been established at the time of abandonment.

#### Second Half Betting

1. Predict the result at the end of the second half.
2. Overtime does not count unless otherwise stated.
3. Any points scored in the first half do not count.
4. The second half must be completed for bets to stand.

#### Quarter Betting

1. Predict the result of a specified quarter.
2. Overtime does not count for betting on the fourth quarter unless otherwise stated.

#### Total Home Team Points

1. Predict the number of points scored by the home team.
2. Overtime counts.

#### Total Away Team Points

1. Predict the number of points scored by the away team.
2. Overtime counts.

#### Halves or Quarters Won

1. Predict the number of halves or quarters won by a specified team.
2. Overtime does not count unless otherwise stated.

#### To Score in All Quarters

1. Predict whether or not a team will score in all quarters.
2. Overtime does not count unless otherwise stated.

#### Total Turnovers

1. Predict the total number of turnovers in the game.
2. Overtime counts.
3. Turnover totals taken from game results.

#### Total Home Team Turnovers

1. Predict the total number of turnovers committed by the home offense.
2. Overtime counts.
3. Turnover totals taken from game results.

#### Total Away Team Turnovers

1. Predict the total number of turnovers committed by the away offense.
2. Overtime counts.
3. Turnover totals taken from game results.

#### Team With Most Turnovers

1. Predict the team that commits the most turnovers.
2. Overtime counts.
3. Turnover totals taken from game results.

#### First Team to Turnover

1. Predict the team that will commit the first turnover in the game.
2. Overtime counts.

3. Turnover totals taken from game results.

Team With the Most Punts

1. Predict the team who will have the most punts in the game.

2. Overtime counts.

3. A punt is performed when the ball is kicked without letting it hit the ground first.

Total Touchdowns

1. Predict the total number of touchdowns in the game.

2. Overtime counts.

Double Result

1. Predict the result at halftime and full time.

2. Overtime counts.

Total First Half Touchdowns

1. Predict the number of touchdowns in the first half.

2. The first half must be completed for bets to stand unless a winning market has already been established at the time of abandonment.

Total Second Half Touchdowns

1. Predict the number of touchdowns in the second half.

2. Overtime does not count unless otherwise stated.

3. The second half must be completed for bets to stand unless a winning market has already been established at the time of abandonment.

Total Home Touchdowns

1. Predict the number of touchdowns scored by the home team.

2. Overtime counts.

Total Away Touchdowns

1. Predict the number of touchdowns scored by the away team.

2. Overtime counts.

Home Team Defensive Touchdowns

1. Predict the number of touchdowns scored by the home defense.

2. Overtime counts.

3. A punt or kickoff return will not count towards a defensive touchdown.

Away Team Defensive Touchdowns

1. Predict the number of touchdowns scored by the away defense.

2. Overtime counts.

3. A punt or kickoff return will not count towards a defensive touchdown.

First Team Touchdown

1. Predict the first team to score a touchdown.

2. Overtime counts.

Second Half First Team Touchdown

1. Predict the first team to score a touchdown in the second half.

2. Overtime does not count unless otherwise stated.

Quarter of First Touchdown

1. Predict the quarter in which the first touchdown is scored.

2. Overtime does not count unless otherwise stated.

Quarter of First Field Goal

1. Predict the quarter in which the first field goal is scored.
2. Overtime does not count unless otherwise stated.

#### Will There be Overtime

1. Predict whether or not there will be overtime.
2. If a game is abandoned prior to the end of regulation, bets are void unless it is the final of the competition, in which case all bets stand for the rescheduled game.

#### Will There be a Safety

1. Predict whether or not there will be a safety in the game.
2. Overtime counts.
3. A safety will be awarded by the officials and is the only means whereby a team not in possession can score points. It can occur in a variety of ways but the most common is when an opponent in possession of the ball is tackled in his own end zone.

#### Passing Yards of a Named Player

1. Predict whether the number of passing yards for a named player will be over or under a specific figure.
2. Overtime counts.

#### Receiving Yards of a Named Player

1. Predict whether the receiving yards for a named player will be over or under a specified figure.
2. Overtime counts.

#### Rushing Yards of a Named Player

1. Predict whether the rushing yards of a named player will be over or under a specified figure.
2. Overtime counts.

#### Team to Call the First Timeout

1. Predict the team that will call the first time out.
2. Overtime counts.
3. A team that lodges an unsuccessful challenge by the coach will not be deemed to have called a timeout.

#### First Coaches Challenge

1. Predict the team whose coach will make the first challenge.
2. Overtime does not count unless otherwise stated.

#### Will a Field Goal be Missed

1. Predict whether or not a field goal will be missed.
2. Overtime counts.

#### Points Scored in a Specific Quarter

1. Predict the range of points scored in a specific quarter.
2. Overtime does not count unless otherwise stated.

#### Will a Touchdown be Scored in a Specific Quarter

1. Predict whether or not a touchdown will be scored in a specific quarter.
2. Overtime does not count unless otherwise stated.

#### Will a Field Goal be Scored in a Specific Quarter

1. Predict whether or not a field goal will be scored in a specific quarter.
2. Overtime does not count unless otherwise stated.

#### First Half Result/Second Half Result

1. Predict the result of two halves; the result of the first half and the result of the second half.
2. Any points scored in the first half do not count towards the result of the second half.
3. Overtime does not count unless otherwise stated.

#### Conference Winner

1. Predict the team that will win the Conference.
2. Playoff conference finals are included.
3. Bets will be settled on completion of the playoff conference finals.

#### Division Winner

1. Predict the team that will win the respective division.
2. Playoff conference finals are not included.
3. Bets will be settled on the division standings after a winner is clinched.

#### Pro Football Championship Total Points Record to be Broken

1. Predict whether or not the current total points record for the Pro Football Championship will be broken.

#### Named Team to Reach/Exceed a Specific Point Total

1. Predict whether or not a named team will reach/exceed a specific point total in any one game during the season.

#### Pro Football Championship MVP

1. Predict which player will be voted the Most Valuable Player in the Pro Football Championship.

#### A Specified Team to Remain Unbeaten

1. Predict that a specified team will remain unbeaten throughout the season.

#### First Player to be Drafted

1. Predict the first player to be picked in the draft.

#### Second Player to be Drafted

1. Predict the second player to be picked in the draft.

#### When Will a Specified Player be Drafted

1. Predict in what order a specified player will be picked in the draft.

#### What Team Will a Specified Player be Picked For During the Draft

1. Predict which team will pick a specified player during the draft.

#### Enhanced Odds Accumulators

1. Predict whether a group of teams will all be successful.
2. If one or more of the games do not take place, bets will be settled at the individual game odds for those teams that complete their matches.

#### Drive Outcome

1. Predict the result of the stated drive of offensive possession. If the stated drive does not commence during regulation, time bets are void. In the event of a Defensive Touchdown the Fumble/INT selection will be deemed the winner.
2. Drives begin on the first offensive snap of the ball.
3. The Field Goal selection is the winning selection in the event of any attempted Field Goal.
4. Drives that finish due to the end of the half or end of the game without establishing the criteria for any of the selections as a result will be settled as void.

#### Reach 1st Down on Drive

1. Predict whether or not the offensive team will achieve a 1st down on the stated drive of possession. If the stated drive does not commence during regulation time, bets are void. In the event of an Offensive Touchdown being scored the Yes selection will be the winner.

#### Football Live Specials

1. All referenced games within each individual selection must be played and completed on the scheduled day for bets to stand.
2. If any component of an individual selection is void, the whole selection is void. Example: Josh Allen and Patrick Mahomes to each throw for over 1.5 touchdowns. Mahomes is injured pregame and does not play a snap in the game. This entire selection would be void.
3. For a selection referencing "To Win All 4 Quarters", this is for a team to outright win each quarter - if the team ties or loses any quarter, this represents a losing bet.
4. Named player must play in the game for action

#### Anytime Touchdown Scorer

1. Predict whether the specified player will score a touchdown in the game.
2. Overtime counts. Bets placed on any player who does not play will be void
3. If no touchdowns are scored the bet will be lost.
4. A touchdown is scored when: the ball is on, above, or behind the plane of the opponents' goal line (extended) and is in possession of a runner who has advanced from the field of play into the end zone.

#### Will the last play of the half or game be a quarterback rush?

1. For the last play of the half or game to be a quarterback rush, whoever takes the direct snap from center will be deemed a quarterback, regardless of the noted player's official team rostered position.

#### Player To Score X Or More Touchdowns

1. Predict whether the specified player will score at least X touchdowns in the match.
2. Overtime counts and bets on players who are 'suited up' and ready to play will count. Bets placed on any player not 'suited up' will be void.
3. If not enough touchdowns are scored stakes will be lost.

#### Score/Win Double

1. Predict whether the specified player will score a touchdown and the specified team will win. Both parts are needed for a winning selection.
2. Overtime counts and bets on players who are 'suited up' and ready to play will count. Bets placed on any player not 'suited up' will be void.
3. If no touchdowns are scored stakes will be lost.

#### Total Match Field Goals

1. Predict the total number of field goals in the match.
2. Overtime counts.

#### Total Team Field Goals

1. Predict the total number of field goals by the specified team in the match.
2. Overtime counts.

#### Total Match Punts

1. Predict the total number of punts in the match.
2. Overtime counts.

#### Total Team Punts

1. Predict the total number of punts by the specified team in the match.
2. Overtime counts.

#### Total Match Turnovers

1. Predict the total number of turnovers in the match.
2. Turnover on downs (failed 4th Down attempts) do not count.
3. Overtime counts.
4. Turnover totals taken from match results on NFL.com

#### Total Team Turnovers

1. Predict the total number of turnovers by the specified team in the match.
2. Turnover on downs (failed 4th Down attempts) do not count.
3. Overtime counts.
4. Turnover totals taken from match results on NFL.com

#### Team To Score The Most Touchdowns

1. Predict which team will score the most touchdowns.
2. Overtime counts.

#### Team To Score The Most Field Goals

1. Predict which team will score the most field goals.
2. Overtime counts.

#### Both Teams To Score At Least X Touchdowns In The Match

1. Predict whether each team will score at least X number of touchdowns in the match.
2. Overtime counts.

#### Both Teams To Score A Touchdown In Each Half

1. Predict whether each team will score a touchdown in each half.
2. Overtime doesn't count.

#### Both Teams To Score A Touchdown In Each Quarter

1. Predict whether each team will score a touchdown in each quarter.
2. Overtime doesn't count.

#### Both Teams To Score A Field Goal In Each Half

1. Predict whether each team will score a field goal in each half.
2. Overtime doesn't count.

#### Both Teams To Score A Field Goal In Each Quarter

1. Predict whether each team will score a field goal in each quarter.
2. Overtime doesn't count.

#### Highest Scoring Quarter

1. Predict which quarter will have the most points.
2. Dead Heat rules apply.
3. Overtime doesn't count.

#### NFL Highest Scoring Team (Designated Time Period)

1. Predict the highest scoring team in designated time period.
2. All teams must complete at least 55 minutes of play in their respective games for a wager to be action.
3. All games must be played within 7 days of the original scheduled date for action.
4. Dead Heat rules apply.

#### College Football Highest Scoring Team (Designated Time Period)

1. Predict the highest scoring team of the grouped listed teams.
2. All teams must complete at least 55 minutes of play in their respective games for a wager to be action.
3. All games must be played within 7 days of the original scheduled date for action.
4. Dead-Heat rules apply.

#### First Team to Score 7 Touchdowns in a Game

1. Wager is for regular-season games ONLY.
2. If multiple teams score seven touchdowns on the same day (with their games starting at the same scheduled time), the winner will be the team that scores their seventh touchdown with the most time remaining on the game clock.
3. If a team in an earlier game and a team playing a later game accomplish this on the same day, the team playing earlier in the day will be considered the winner.

#### Net Yards Gained on Next Drive

1. Predict whether the offense will gain more or less than the stated amount of yards on their next drive.
2. Drives begin on the first offensive snap of the ball.
3. Net Yardage will be calculated from the initial spot of the ball for the first play of the drive.
  - a. If an offense is penalized and pushed back this will count against their net yardage.
    - i. Example: 1st play of the drive begins on the offense's own 25 yard line. A holding penalty moves them to 1st and 20 at their own 15 yard line. The current net yards would be -10 yards.
    - b. Results will be settled based off the final field position of the drive.
      - i. Example: If the stated Net Yards Gained is 35.5 and the offense at one point in the drive has 40 net yards, but ultimately finishes the drive with 34 net yards due to a negative play the "under 35.5" will be the winning selection.
    - c. If there is a turnover behind the line of scrimmage, the net yards of the drive will be measured from the furthest point reached by the offense prior to the play involving the turnover, not the point of recovery by the defense.
    - d. For a fumble that occurs beyond the line of scrimmage the yard line where the fumble takes place will be used for settlement.

#### Big Play on Drive (20 or More Yards)

1. A big play for the purposes of this market is defined as an offensive play of 20 or more yards.
2. Drives begin on the first offensive snap of the ball.
3. Predict whether the team on offense will record a play of 20 or more yards on their current drive.
4. Penalty yards do not factor into determining if it is a big play or not, whether it be a penalty of 20 or more yards or penalty yards added onto the end of a play (i.e. Pass interference, personal foul, etc).
5. If there is a turnover behind the line of scrimmage, the net yards of the drive will be measured from the furthest point reached by the offense prior to the play involving the turnover, not the point of recovery by the defense.
6. For a fumble that occurs beyond the line of scrimmage the yard line where the fumble takes place will be used for settlement.

#### Yardline Crossed

1. Predict whether the team on offense will cross the selected yardline at any point in their current drive
2. Drives begin on the first offensive snap of the ball
3. Penalties that move a team across the stated yardline will count towards the “Yes”
4. If the team on offense crosses the stated yardline successfully, and subsequently is pushed back before the stated yardline whether it be due to a negative play, a penalty, or any other reason, the “Yes” selection will still be the winning selection.
5. A team must successfully complete a play across the stated yardline for the “Yes” selection to be considered the winning selection
  - a. If the offensive team crosses the stated yardline on a play, but then turns the ball over before the play is completed this will not be considered as them successfully crossing the stated yardline.

#### Caesars Squares

##### Final Score Squares

1. The listed digit reflects the last digit of each teams’ final score.
2. Game must go at least 55 minutes for action.
3. Game must be played within seven days of the scheduled start for action. The only exception being the final/championship of a competition, in which case bets stand for the rescheduled game.

##### End of Third Quarter Score Squares

1. The listed digit reflects the last digit of each teams’ score at the end of the third quarter.
2. Game must complete the third quarter for action.
3. Game must be played within seven days of the scheduled start for action. The exception being the final/championship of a competition, in which case bets stand for the rescheduled game.

##### Halftime Score Squares

1. The listed digit reflects the last digit of each teams’ score at the end of the first half.
2. Game must complete the first half for action.
3. Game must be played within seven days of the scheduled start for action. The exception being the final/championship of a competition, in which case bets stand for the rescheduled game.

##### Regular Season Player Statistical Leader Futures Markets

1. For regular-season player statistical leader futures markets, player must play at least one regular season game for action.
2. In case of a tie, dead heat rules apply.

##### Regular Season Individual Player Statistical Markets

1. For regular-season individual player statistical markets, player must play at least one regular season game for action.

##### Regular Season Team Futures Markets

1. For regular-season team futures markets, teams must play all scheduled regular season games for action.
2. In case of a tie, dead heat rules apply.

##### Award Markets

1. Player or coach must play/coach in at least one regular season game for action.



2. As long as the league designates a winner of a particular award, wagers are action regardless of the number of games played in a season or playoffs.
3. In case of a tie, dead heat rules apply.

#### Regular Season Win Totals

1. For regular season win totals, team must play all scheduled games for action, unless otherwise stated.
2. For regular season division wins totals, team must play all scheduled division games for action.

#### Make-Miss Playoffs

1. For make-miss playoff markets, team must play all scheduled games for action.
2. Play-in games are not considered making the playoffs. A team playing in a play-in game and not advancing to the actual playoff round, would be considered as NOT making the playoffs.

**APPENDIX 4: Email Correspondence with Defendant**

**on-bet inquiry-82BBE41AD84C27A3 [Incident: 230110-000104]**

?

You replied on Wed 2023-01-11 3:29 PM

You replied on Wed 2023-01-11 3:29 PM

A

adminsupport <adminsupport@custhelp.com>

?

?

?

?

To:

• You

Wed 2023-01-11 3:27 PM



Recently you requested personal assistance from our on-line support center. Below is a summary of your request and our response. If this issue is not resolved to your satisfaction, you may reopen it within the next 7 days. Thank you for allowing us to be of service to you.

Subject

**on-bet inquiry-82BBE41AD84C27A3**

Response By Email (Dontavius) (01/11/2023 12:27 PM)

Hello Matthew

Dontavius here customer support lead. Reaching out to inform you about your 2 wagers on bills season total wins. this will actually be voided and the

funds will be returned back to your account, If you have any questions or concerns feel free to reach out to us.

Thanks !

Chat By Chat (Carlos) (01/10/2023 04:29 AM)

Carlos: Hi, my name is Carlos. How may I help you?

Matthew Buchalter: **Chatbot Transcript:**

**Betty:** Greetings, Emperor! I'm Caesars Personal Assistant for the people.

**Betty:** What information can I help you find?

**Matthew Buchalter:** Betting

**Betty:** What information are you looking for about betting?

**Matthew Buchalter:** Betting by Sport

**Betty:** That's a great question, Emperor, but not an easy one to answer.

The good news is we've created a guide [here](#) to help you, or if you'd rather, we also have a series of YouTube videos you can find [here](#).

**Betty:** Do you need help with anything else?

**Matthew Buchalter:** Yes

**Betty:** What information can I help you find?

**Matthew Buchalter:** Transfer To Agent

**Betty:** Let me get you to someone who can help.

Matthew Buchalter: I have some Buffalo Bills and Cincinnati Bengals season win total bets that were graded as losses that say "must play 17 games for action"

Carlos:

I can definitely help you with that.

In order to better assist you, can you please provide the answers to your security questions for me: What is your anniversary date?

What is your spouse's middle name?

What is your mother's maiden name?

Matthew Buchalter: July 10

Matthew Buchalter: <redacted>

Matthew Buchalter: <redacted>

Carlos: Thank you for verifying your security information. Please allow me a few minutes to look at your account history

Carlos:

Thank you for holding , Do you have the Bet ID?

Bet ID contains 32 characters players must click on the bet to have bet ID show.

System: Customer is sending a file

System: File received successfully. B0EAA8A4-7344-4E1A-B51B-46CFD9BD387C.png (180.12KB)

Matthew Buchalter: There are many of them

Matthew Buchalter: here are 2

Carlos: thank you allow me a moment

System: 'Matthew Buchalter' is currently 'Absent'. Approximately 120 seconds until disconnect.

System: 'Matthew Buchalter' is currently 'Active'.

Carlos: Thank you so much for holding, I'm still working on the issue, one moment please

Matthew Buchalter: Ok

Carlos: I'm getting this escalated, please if you can stay with me on the chat while I wait for the response.

Matthew Buchalter: Thank you

Carlos: Thank you for holding, I have escalated your case to the Escalation Team for further review. They will look into your case as soon as possible, therefore please keep checking your account for updates, note that they may also contact you via email so please be sure to check all inboxes when looking for correspondence from Caesars Sportsbook, is there anything else besides this?

Matthew Buchalter: No

Carlos: It's been a real pleasure chatting with you today! Thank you for contacting The Empire ,if you have any other questions or concerns, please do not hesitate to contact us again, have a Royal day!

System: Concluded by Agent

Question Reference # 230110-000104

- Date Created: 01/10/2023 04:29 AM
- Date Last Updated: 01/11/2023 12:27 PM
- Status: Solved

[---002:002981:39445---]

**APPENDIX 5: Email Correspondence with Regulator**

**RE: Complaint #2014481 - Caesar's Sportsbook**

?

You replied on Fri 2023-02-03 5:40 PM

You replied on Fri 2023-02-03 5:40 PM

IE

iGO Player Escalations <playerescalations@igamingontario.ca>

?

?

?

?

To:

• You

Fri 2023-02-03 3:53 PM

Start reply with:

Thank you. I appreciate that.Thank you for the update.Thank you very much for the update.

Hi Mr. Buchalter,

Thank you for your patience as we reviewed this matter.

Our review is now complete, and it has been determined that Caesar's settled your bets appropriately as per their House Rules.

We understand that this not the outcome you were looking for, however, iGO is satisfied with the information that has been provided, and we consider this matter closed.

Regards,

**Saba V.**

Account Management Service Coordinator  
iGaming Ontario

[www.igamingontario.ca](http://www.igamingontario.ca) | [www.jeuxenligneontario.ca](http://www.jeuxenligneontario.ca)

**From:** Matthew Buchalter <redacted>  
**Sent:** January 31, 2023 12:17 PM  
**To:** iGO Player Escalations <playerescalations@igamingontario.ca>  
**Subject:** Re: Complaint #2014481 - Caesar's Sportsbook

**CAUTION**

This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender.

---

Hi - any update on this? Thanks for all your help!

Matt

Sent from my iPhone

On Jan 27, 2023, at 3:29 PM, iGO Player Escalations <[playerescalations@igamingontario.ca](mailto:playerescalations@igamingontario.ca)> wrote:

Hello Mr. Buchalter,

Thank you for response.

This is to notify you that I have reached out to the operator regarding your complaint.

Once we gather all the pertinent information from the operator, I follow up with you directly.

Have a great weekend!

Regards,

**Saba V.**

Account Management Service Coordinator  
iGaming Ontario

[www.igamingontario.ca](http://www.igamingontario.ca) | [www.jeuxenligneontario.ca](http://www.jeuxenligneontario.ca)

<image002.png>

*iGaming Ontario ("iGO") iGO cannot directly settle any bets, refund wagers or award compensation, players may escalate an unresolved or unsatisfactorily resolved dispute to iGO for review, after first attempting to resolve it with the regulated Operator.*

**From:** Matthew Buchalter <redacted>  
**Sent:** January 25, 2023 3:01 PM  
**To:** iGO Player Escalations <[playerescalations@igamingontario.ca](mailto:playerescalations@igamingontario.ca)>  
**Subject:** Re: Complaint #2014481 - Caesar's Sportsbook

**CAUTION**

This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender.

Hello Saba - thank you for your response!

I have not received the funds. The operator's position was given to me by phone call from American Wagering 1-855-754-1200 on Jan 12 at 4:53pm so I do not have any screen shots.

The bets in question are:

1. Indianapolis Colts, best regular season record, \$500 placed on July 7 2022 11:41 AM ref #4557f390
2. Buffalo under 10.5 wins, \$500 placed on June 26 2022 5:06 PM ref #eaf7d1b0
3. Buffalo under 10.5 wins, \$1000 placed on Aug 22 2022 3:58 PM ref#ce4fffe0
4. Buffalo exactly 15 wins, \$50 placed on June 26 2022 8:44 PM ref #4d286700
5. Buffalo exactly 16 wins, \$50 placed on June 26 2022 8:44 PM ref #4d5f5580
6. Cincinnati exactly 13 wins, \$50 placed on June 26 2022 9:19 PM ref #30d18320
7. Cincinnati exactly 14 wins, \$50 placed on June 26 2022 9:19 PM ref #3f756040
8. Cincinnati exactly 15 wins, \$50 placed on June 26 2022 9:19 PM ref #3f756041
9. Cincinnati exactly 16 wins, \$50 placed on June 26 2022 9:19 PM ref #3f756042

Of these 9 bets, only #6 Cincinnati exactly 13 wins for \$50 was refunded. The other 8 bets totalling \$2,250 were graded as losses and should have been voided per Caesars house rules.

My username is my email address <redacted>

Thanks for your attention to this.

Matt



**From:** iGO Player Escalations <[playerescalations@igamingontario.ca](mailto:playerescalations@igamingontario.ca)>  
**Sent:** January 25, 2023 2:46 PM  
**To:** <redacted>  
**Subject:** Complaint #2014481 - Caesar's Sportsbook

Hello Mr. Buchalter,

I'm contacting you regarding Complaint # 2014481 that the iGO Support Centre team has escalated for review.

In your email, you indicated that the operator "first agreed to refund two of the bets and then changed their minds." We did not see any attached communication from the operator to indicate that the Operator's decision had been reversed.

Based on the attachments that you provided, on January 11 at 12:27pm, the Customer Support lead at Caesars advised you that your 2 wagers would be voided, and the funds would be returned to your account. If you have not received the funds, and the Operator has taken a different position, please attach a screenshot of this communication from the Operator.

Please answer the following questions in order to assist us in understanding your complaint:

1. Have the funds have been returned to your account?
2. When did the Operator reverse the decision to void your bet? (Please attach a screenshot of this communication)
3. What is the total dollar amount that you believe is outstanding?
4. What is your username on the Operator's site (no password)?

Best Regards,

**Saba V.**

Account Management Service Coordinator

iGaming Ontario

[www.igamingontario.ca](http://www.igamingontario.ca) | [www.jeuxenligneontario.ca](http://www.jeuxenligneontario.ca)

<image003.png>

*iGaming Ontario ("iGO") iGO cannot directly settle any bets, refund wagers or award compensation, players may escalate an unresolved or unsatisfactorily resolved dispute to iGO for review, after first attempting to resolve it with the regulated Operator.*

## **APPENDIX 6: Proof of Postponement**

Source: <https://www.nfl.com/news/bills-chiefs-neutral-site-afc-championship-game-in-play-bengals-avoid-coin-toss->

Accessed Feb 7 2023.

Bills-Chiefs neutral site AFC Championship Game in play; Bengals avoid coin toss with win over Ravens

Published: Jan 08, 2023 at 04:37 PM

NFLShield

Around the NFL Staff

NFL.com

A look at finalized AFC playoff picture for 2022 postseason

Any potential AFC Championship Game between the Buffalo Bills and the Kansas City Chiefs would be played at a neutral site following the Bills' 35-23 win over the Patriots on Sunday.

The Bengals' 27-16 win over the Ravens on Sunday also negated a scenario in which a coin toss would decide home-field advantage in a Baltimore-Cincinnati wild-card matchup, which would have been in play if the Ravens won and the Chargers beat the Broncos. The third-seeded Bengals will host the sixth-seeded Ravens during Super Wild Card Weekend.

The decision to potentially play the title game at a neutral site followed the NFL's announcement on Thursday that the Week 17 game between the Bills and the Cincinnati Bengals would be canceled. The game had initially been postponed after Bills safety Damar Hamlin suffered a cardiac arrest during the game.

NFL owners on Friday approved a resolution to potentially adjust the AFC playoffs in the case of there being a matchup between teams whose records were affected by the cancellation.

The resolution included the provision that if both Buffalo and Kansas City won in Week 18 and both teams then advanced to the AFC championship, then the title game would be played at a neutral site to avoid any competitive inequities based on the differing number of games each club played affecting their ability to clinch home-field advantage.

The Chiefs (14-3) clinched the No. 1 seed and a first-round bye on Saturday. The Bills (13-3) secured the conference's No. 2 seed with their win over New England.

The NFL has not yet announced which stadium would be chosen as the neutral site in the case it is needed.

Buffalo announced on Saturday that Hamlin remains in critical condition, but is making continued progress, per physicians at the University of Cincinnati Medical Center, where Hamlin has been under care since Monday night. The defensive back "continues to breathe on his own and his neurological function is excellent," and on Friday he virtually addressed the team during a meeting.