

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

LARRY KLAYMAN,

Plaintiff,

v.

PGA TOUR, DP WORLD TOUR, JOSEPH
WILLIAM MONAHAN IV, and KEITH
PELLEY,

Defendants.

Case Number:

Class Representation

CLASS ACTION COMPLAINT

Plaintiff, LARRY KLAYMAN (“KLAYMAN”), individually, and on behalf of all others similarly situated (collectively “Plaintiffs”), hereby files this action against Defendants PGA TOUR, DP WORLD TOUR, JOSEPH WILLIAM MONAHAN IV (“MONOHAN”), and KEITH PELLEY (“PELLEY”) (hereinafter collectively “Defendants”) for violations of Sections 542.18 and 542.19 of the Florida Antitrust Act, Fla. Stat. §§ 542.18, 542.19, and for civil conspiracy. In support thereof, Plaintiffs allege as follows:

JURISDICTION AND VENUE

1. This is an action for concerted refusal to deal, horizontal market division, monopolization, and attempt to monopolize in violation of Sections 542.18 and 542.19 of the Florida Antitrust Act, Fla. Stat. §§ 542.18, 542.19, and for civil conspiracy. This Court has subject matter jurisdiction over this action pursuant to Sections 542.22(1) and 542.23 of the Florida Antitrust Act, Fla. Stat. §§ 542.22(1), 542.23 and the amount in controversy between the parties is greater than \$30,000.00.

2. This Court has personal jurisdiction over Defendants PGA TOUR, DP WORLD TOUR, MONAHAN, and PELLELY as they have engaged in sufficient substantial contacts and committed unlawful, anticompetitive acts with and within this county and have purposefully availed themselves of the benefits and protections of Florida law, such that the Defendants should reasonably anticipate being hailed into court here, and the exercise of jurisdiction over PGA TOUR, DP WORLD TOUR, MONAHAN, and PELLELY would comport with due process requirements.

3. Venue for this action is properly in Palm Beach County, Florida, as: (i) Plaintiff KLAYMAN is a Florida citizen who resides in this county; (ii) Defendants PGA TOUR, DP WORLD TOUR, MONAHAN, and PELLELY do substantial business in this county; and (iii) a substantial part of the events that give rise to Plaintiff KLAYMAN's claims occurred in this county and circuit.

THE PARTIES

4. Plaintiff KLAYMAN is a citizen and resident of Florida, is a spectator at PGA TOUR organized and sanctioned professional golf tournaments, and is thus a consumer of Defendant PGA TOUR's product. As set forth in more detail in paragraph 27 below, Plaintiff KLAYMAN has purchased spectator admission to three PGA TOUR organized and sanctioned events hosted outside of Florida, and is committed to also purchasing spectator admission to PGA TOUR organized and sanctioned events which will be hosted in Florida. These include at least The Players Championship, which will be hosted on March 10-14, 2023 at TPC Sawgrass in Ponte Vedra Beach, Florida, and The Honda Classic, which will be hosted on February 24-27, 2023 at PGA National in Palm Beach Gardens, Florida.

5. On information and belief, Defendant PGA TOUR is a non-profit company with its principal place of business in Ponte Vedra, Florida. Defendant PGA TOUR is the leading organizer of professional golf tournaments in the United States and has sanctioned 43 professional tournaments for its 2021-22 season, including The Players Championship hosted at TPC Sawgrass in Ponte Vedra Beach, Florida, The Honda Classic in Palm Beach Gardens, Florida, and three other tournaments hosted in Florida, as well as other tournaments nationally and internationally.

6. Defendant Joseph William Monahan IV (also known as “Jay Monahan”) (hereinafter “MONAHAN”) is the PGA TOUR’s Commissioner and is a citizen of Florida who resides in Ponte Vedra, Florida.

7. Defendant DP WORLD TOUR is an organization having its principal place of business in Virginia Water, Surrey, in the United Kingdom. On information and belief, DP WORLD TOUR, formerly known as the PGA European Tour, is a separate entity and operation from Defendant PGA TOUR but in 2021 entered into a strategic alliance with Defendant PGA TOUR pursuant to which the two organizations would co-sponsor the Scottish Open, along with the Barbasol Championship and the Barracuda Championship in the United States.

8. On information and belief, Defendant PELLETT is the DP WORLD TOUR’s chief executive officer and is a Canadian citizen who resides at Virginia Water, Surrey, in the United Kingdom.

CLASS REPRESENTATION ALLEGATIONS

9. Pursuant to Rule 1.220(b) subdivisions (1)(A), (2), and (3) of the Florida Rules of Civil Procedure, Fla. R. Civ. P. 1.220(b)(1)(A), (2), and (3), Plaintiff KLAYMAN’s claims are maintainable on behalf of a class of Florida residents who, after June 9, 2022, have purchased

and/or will purchase spectator admission to professional golf tournaments organized and sanctioned by Defendant PGA TOUR.

10. Plaintiff KLAYMAN has asserted, in his individual capacity and on behalf of the proposed plaintiff class, claims for concerted refusal to deal, horizontal market division, monopolization, attempt to monopolize the relevant market, and civil conspiracy, those claims being set forth in the First through Fifth Causes of Action below. The questions of law and fact relating to those claims are common to the claims of Plaintiff KLAYMAN and the claims of each member of the proposed class, and include, *e.g.*, issues relating to the illegality under Florida antitrust law of: (i) Defendants' agreement to suspend professional golfers who participate in professional golf tournaments organized by LIV Golf Investments; (ii) Defendant PGA TOUR and Defendant DP WORLD TOUR's agreement to divide between them the United States, European, and world markets for organizing, sanctioning, and offering spectators admission to professional golf tournaments; (iii) definition of the relevant product and geographic market for purposes of the First through Fourth Causes of Action set forth below; (iv) Defendant PGA TOUR's monopoly power in the relevant market; (v) Defendant PGA TOUR's monopolization and attempt to monopolize the relevant market; (vi) Defendants' civil conspiracy and the overt acts undertaken by the Defendants in furtherance of their civil conspiracy; and (vii) the antitrust injury suffered by Florida citizens and residents who, after June 9, 2022, have purchased or will purchase spectator admission at professional golf tournaments organized and sanctioned by Defendant PGA TOUR. Additional factual and legal issues which are common to the claims of Plaintiff KLAYMAN and the claims of each member of the proposed class relate to the appropriate injunctive relief needed to terminate the Defendants' illegal conduct.

11. Plaintiff KLAYMAN's claims against the Defendants are typical of the claims of each member of the proposed class. Plaintiff KLAYMAN, along with all members of the proposed class, have been similarly affected by the Defendants' concerted refusal to deal and horizontal division of markets, Defendant PGA TOUR's monopolization and attempt to monopolize the United States market for organizing, sanctioning, and offering spectators admission to professional golf tournaments, and Defendants' civil conspiracy. All proposed members of the class have suffered the same harm as Plaintiff KLAYMAN, *i.e.*, after June 9, 2022, paying supracompetitive prices for spectator admission to professional golf tournaments hosted in Florida and elsewhere in the United States.

12. On information and belief, the proposed class numbers in the thousands, such that separate joinder of each class member is impracticable.

13. Plaintiff KLAYMAN defines the proposed class as Florida citizens and residents who, after June 9, 2022, have purchased and/or will purchase spectator admission to professional golf tournaments organized and sanctioned by Defendant PGA TOUR.

14. As an attorney appearing *pro se* who is represented in this action by experienced plaintiff's counsel, Plaintiff KLAYMAN will fairly and adequately protect and represent the interests of each member of the class.

15. Certification of this case as a class action pursuant to Florida Rule of Civil Procedure 1.220(b), subdivisions (1)(A), (2), and (3), is supported by the facts and circumstances set forth in paragraphs 10-14 above and in the Background and Facts and First through Fifth Causes of Action set forth below.

**BACKGROUND AND FACTS PERTAINING TO FLORIDA
ANTITRUST VIOLATIONS AND CIVIL CONSPIRACY**

16. On information and belief, LIV Golf Investments (“LIV Golf”) is a professional golf tour operating company which is financially backed by the Public Investment Fund of Saudi Arabia. On information and belief, LIV Golf has its principal place of business in West Palm Beach, Florida, and is seeking to compete against Defendants PGA TOUR and DP WORLD TOUR in the United States and the world.

17. LIV Golf held its inaugural professional golf tournament from June 9-11, 2022 at the Centurion Club in Hertfordshire, England. Its next event will be held from June 30-July 2, 2022 at Pumpkin Ridge Golf Club in Portland, Oregon. More LIV Golf tournaments have been scheduled for 2022 and 2023.

18. On or around June 9, 2022, Defendant PGA TOUR announced the suspension of 17 PGA TOUR professional golfers who were participating in the LIV Golf’s inaugural tournament.

19. On information and belief, Defendant DP WORLD TOUR has entered into a strategic alliance – which both Defendant PGA TOUR and DP WORLD TOUR describe as a partnership with Defendant PGA TOUR – pursuant to which they are co-sanctioning two professional golf tournaments in the United States – *i.e.*, the Barbasol Championship, which will be played in July 2022 in Nicholasville, Kentucky, and the Barracuda Championship, which will be played in July 2022 in Truckee, California.

20. On June 24, 2022, Defendant DP WORLD TOUR announced that it was fining each of the DP WORLD TOUR professional golfers who participated in the LIV TOUR’s inaugural golf tournament in the amount of approximately \$125,000 and banned them from the upcoming Scottish Open, as well as the Barbasol Championship and the Barracuda

Championship, with more sanctions to follow for any other golfer who joins the LIV Golf tour in the future.

21. Based on their apparent concerted conduct and other indicia, on information and belief, Defendants PGA TOUR and DP WORLD TOUR (through Defendants MONAHAN and PELLEY) have expressly or tacitly agreed to suspend PGA TOUR and DP WORLD TOUR professional golfers who have participated in LIV Golf's professional golf tournaments.

22. Even though DEFENDANT PGA TOUR has announced its suspension of golfers who play in LIV Golf events, some professional golfers who have played in PGA TOUR events in the United States and are dissatisfied with Defendant PGA TOUR's anticompetitive practices have decided to play in LIV Golf tournaments, including some well-known and/or highly-ranked PGA TOUR players (*e.g.*, Phil Mickelson, Brooks Koepka, Dustin Johnson, Bryson DeChambeau, Patrick Reed, Kevin Na, Charl Schwartzel, Ian Poulter, Lee Westwood, and Sergio Garcia). More are expected to join the LIV Golf tour.

23. On information and belief, notwithstanding the defection of 17 PGA TOUR players to LIV Golf, Defendant PGA TOUR's suspension of LIV Golf participants has had and will continue to have the anticompetitive effects of deterring many PGA TOUR professional golfers from playing in LIV Golf events and retarding LIV Golf's efforts to compete against Defendants PGA TOUR and DP WORLD TOUR.

24. The relevant product market for the causes of action set forth below is the market for organizing, sanctioning, and offering spectators admission to professional golf tournaments.

25. The relevant geographic market for the causes of action set forth below is the United States.

26. On information and belief, Defendant PGA TOUR (including its subsidiaries) sanctions substantially more than 90 percent of the professional golf tournaments in the United States and with its subsidiaries is the dominant organizer of professional tournament golf in the United States. On information and belief, Defendant PGA TOUR thereby has monopoly power in the United States market for organizing, sanctioning, and offering spectators admission to professional golf tournaments.

27. Plaintiff KLAYMAN has purchased spectator admission to three PGA TOUR-organized and sanctioned events: (i) the John Deere Classic which will be hosted on June 30, 2022 at the TPC Deere Run in Silva, Illinois; (ii) the Fortinet Championship which will be hosted on September 16-19, 2022 at the Silverado Resort and Spa North in Napa Valley, California; and (iii) the Barracuda Championship which will be hosted on July 14-17, 2022 at the Tahoe Mountain Club in Truckee, California. Plaintiff KLAYMAN is committed to also purchasing spectator admission to PGA TOUR organized and sanctioned events which will be hosted in Florida, including at least The Players Championship which will be hosted on March 10-14, 2023 at TPC Sawgrass in Ponte Vedra Beach, Florida and The Honda Classic which will be hosted on February 24-27, 2023 at PGA National in Palm Beach Gardens, Florida. Plaintiff KLAYMAN is thereby representative of a class of plaintiffs who are citizens and residents of Florida and have purchased admission to PGA TOUR organized and sanctioned professional golf tournaments which are hosted in Florida and/or in other states outside of Florida.

28. As a result of Defendants' conduct, Plaintiff KLAYMAN and the proposed plaintiff class of similarly-situated Florida residents have suffered damages greater than \$30,000 in *toto*, accounting for the supracompetitive prices paid by KLAYMAN and the plaintiff class for admission to PGA-organized tournaments in Florida.

FIRST CAUSE OF ACTION

Concerted Refusal to Deal

29. Plaintiff KLAYMAN re-alleges and incorporates by reference the allegations in the preceding paragraphs of this Complaint as if fully set forth herein.

30. On information and belief, Defendant PGA TOUR (through Defendant MONAHAN and others), has agreed with Defendant DP WORLD TOUR (through Defendant PELLE and others) to suspend professional golfers who have participated in LIV Golf tournaments (hereinafter “LIV professional golfers”) and exclude LIV professional golfers from participating in the professional golf tournaments Defendants PGA TOUR and DP WORLD TOUR organize and sanction in their respective geographic markets. The purpose and effect of this concerted refusal to deal is to discourage skilled, popular professional golfers from participating in LIV Golf tournaments and to thereby prevent LIV Golf from competing effectively against Defendants PGA TOUR and DP WORLD TOUR and foreclose LIV Golf from entering the United States and European markets for organizing, sanctioning, and offering spectators admission to professional golf tournaments.

31. The relevant product market for this cause of action is the market for organizing, sanctioning, and offering spectators admission to professional golf tournaments.

32. The relevant geographic market for this cause of action is the United States.

33. On information and belief, Defendant PGA TOUR (including its subsidiaries) sanctions substantially more than 90 percent of the professional golf tournaments in the United States and with its subsidiaries is the dominant organizer of professional tournament golf in the

United States. Defendant PGA TOUR thereby has monopoly power in the United States market for organizing, sanctioning, and offering spectators admission to professional golf tournaments.

34. Defendant PGA TOUR's exercise of its monopoly power as the dominant organizer of professional golf tournaments in the United States and its agreement with Defendant DP WORLD TOUR to suspend participants in LIV Golf tournaments have the purpose and effect of discouraging and even precluding PGA TOUR professional golfers from participating in LIV Golf tournaments in the United States and worldwide. Defendant PGA TOUR's abuse of its monopoly power and its agreement with DP WORLD TOUR to suspend participants in LIV Golf tournaments thereby retards LIV Golf's ability to organize and sanction professional golf tournaments in the United States and worldwide and has the anticompetitive purposes and effects of maintaining Defendant PGA TOUR's monopoly power in the United States and preventing competition from LIV Golf in the sale of admission to tournament spectators, including Plaintiff KLAYMAN, the proposed plaintiff class, and other fans of professional golf in the United States.

35. Defendants' concerted refusal to deal with PGA TOUR professional golfers who participate in LIV Golf tournaments lacks any procompetitive effects or justifications and thereby violates Section 542.18 of the Florida Antitrust Act, Fla. Stat. § 542.18, whether it is viewed under a rule of reason or a per se analysis.

36. Defendants' concerted refusal to deal with PGA TOUR professional golfers who participate in LIV Golf tournaments has caused Plaintiff KLAYMAN and the proposed plaintiff class to suffer antitrust injury, that is, injury of the type the Florida antitrust laws are intended to prevent, by maintaining supracompetitive prices for spectator admission to PGA TOUR-organized and sanctioned golf tournaments in the United States.

SECOND CAUSE OF ACTION

Market Division

37. Plaintiff KLAYMAN re-alleges and incorporates by reference the allegations in the preceding paragraphs of this Complaint as if fully set forth herein.

38. On information and belief, Defendants PGA TOUR and DP WORLD TOUR are engaged in a horizontal agreement between them (implemented by Defendants MONAHAN and PELLEY) to retard entry by and exclude competition from LIV Golf in the United States and European markets for organizing, sanctioning, and offering spectators admission to professional golf tournaments.

39. The Defendants' horizontal division of markets has been effectuated by their concerted refusal to deal set forth in the First Cause of Action above.

40. The relevant product market for this cause of action is organizing, sanctioning, and offering spectators admission to professional golf tournaments.

41. The relevant geographic market for this cause of action is the United States.

42. The horizontal division of markets by Defendants PGA TOUR and DP WORLD TOUR has the purpose and effect of retarding entry by and excluding competition from LIV Golf in the United States and European markets for organizing, sanctioning, and offering spectators admission to professional golf tournaments.

43. Defendant PGA TOUR's participation in the above-described horizontal division of markets has the purpose and effect of enabling Defendant PGA TOUR to preserve and maintain its dominant position in the United States market for organizing, sanctioning, and offering spectators admission to professional golf tournaments.

44. Defendants' horizontal market division scheme is a per se violation of Section 542.18 of the Florida Antitrust Act, Fla. Stat. § 542.18.

45. Defendants' horizontal market division scheme has caused Plaintiff KLAYMAN and the proposed plaintiff class to suffer antitrust injury, that is, injury of the type the Florida antitrust laws are intended to prevent, by maintaining supracompetitive prices for spectator admission to PGA TOUR organized and sanctioned golf tournaments in the United States.

THIRD CAUSE OF ACTION

Monopolization

46. Plaintiff KLAYMAN re-alleges and incorporates by reference the allegations in the preceding paragraphs of this Complaint as if fully set forth herein.

47. The relevant product market for this cause of action is organizing, sanctioning, and offering spectators admission to professional golf tournaments.

48. The relevant geographic market for this cause of action is the United States.

49. On information and belief, Defendant PGA TOUR (including its subsidiaries) sanctions substantially more than 90 percent of the professional golf tournaments in the United States and with its subsidiaries is the dominant organizer of professional tournament golf in the United States. Defendant PGA TOUR thereby has monopoly power in the United States market for organizing, sanctioning, and offering spectators admission to professional golf tournaments.

50. Defendant PGA TOUR thereby has the power to maintain and increase, if not inflate, the price of spectator admission at professional golf tournaments in the United States free of competition from other golf tournament organizing and sanctioning organizations.

51. By the concerted refusal to deal and horizontal market division scheme described in First and Second Causes of Action above, Defendants PGA TOUR and MONAHAN seek to retard entry by and exclude competition from LIV Golf and preserve and maintain Defendant PGA TOUR's monopoly power over organizing, sanctioning, and offering spectators admission to professional golf tournaments in the United States. Defendant PGA TOUR is thereby

monopolizing the market for organizing, sanctioning, and offering spectators admission to professional golf tournaments in the United States in violation of Section 542.19 of Florida's Antitrust Act, Fla. Stat. § 542.19.

52. Even without an agreement between Defendant PGA TOUR and Defendant DP WORLD TOUR to suspend PGA TOUR professional golfers who participate in LIV Golf tournaments, and even without a horizontal agreement between those Defendants to divide the United States and European markets between them, that is to say, even if Defendant PGA TOUR acted unilaterally in adopting a policy and practice of suspending professional golfers who participate in LIV Golf tournaments, it would have the purposes and effects of retarding entry by and excluding competition from LIV Golf and preserving and maintaining Defendant PGA TOUR's monopoly power. Even a unilateral suspension of professional golfers who participate in LIV Golf tournaments – by preserving and maintaining Defendant PGA TOUR's monopoly power – is exclusionary and anticompetitive and would be unlawful monopolization in violation of Section 542.19 of the Florida Antitrust Act, Fla. Stat. § 542.19.

53. Defendants PGA TOUR's monopolization of the United States market for organizing, sanctioning, and offering spectators admission to professional golf tournaments has caused Plaintiff KLAYMAN and the proposed plaintiff class to suffer antitrust injury, that is, injury of the type the Florida antitrust laws are intended to prevent, by maintaining supracompetitive prices for spectator admission to PGA organized and sanctioned golf tournaments in the United States.

FOURTH CAUSE OF ACTION

Attempt to Monopolize

54. Plaintiff KLAYMAN re-alleges and incorporates by reference the allegations in the preceding paragraphs of this Complaint as if fully set forth herein.

55. The relevant product market for this cause of action is organizing, sanctioning, and offering spectators admission to professional golf tournaments.

56. The relevant geographic market for this cause of action is the United States.

57. On information and belief, Defendant PGA TOUR (including its subsidiaries) sanctions substantially more than 90 percent of the professional golf tournaments in the United States and with its subsidiaries is the dominant organizer of professional tournament golf in the United States. Defendant PGA TOUR thereby has monopoly power in the United States market for organizing, sanctioning, and offering spectators admission to professional golf tournaments.

58. Defendant PGA TOUR thereby has the power to maintain and increase, if not inflate, the price of spectator admission at professional golf tournaments in the United States free of competition from other golf tournament organizing and sanctioning organizations.

59. By the concerted refusal to deal and horizontal market division scheme described in First and Second Causes of Action above, Defendants PGA TOUR and MONAHAN seek to retard entry by and exclude competition from LIV Golf and preserve and maintain Defendant PGA TOUR's monopoly power over the organizing, sanctioning, and offering spectators admission to professional golf tournaments in the United States.

60. With its dominant market share and existing monopoly power, and by its conduct as set forth in the First and Second Causes of Action above, Defendant PGA TOUR is dangerously likely to succeed in its efforts to exclude LIV Golf and all other competition from the United States market for organizing, sanctioning, and offering spectators admission to professional golf tournaments and to succeed in preserving and maintaining its monopoly power in the relevant market.

61. Defendant PGA TOUR is thereby attempting to monopolize the United States market for organizing, sanctioning, and offering spectators admission to professional golf in violation of Section 542.19 of Florida's Antitrust Act, Fla. Stat. § 542.19.

62. Even without an agreement between Defendant PGA TOUR and Defendant DP WORLD TOUR to suspend PGA TOUR professional golfers who participate in LIV Golf tournaments, and even without a horizontal agreement between those Defendants to divide the United States, European, and world markets between them, that is to say, even if Defendant PGA TOUR acted unilaterally in adopting a policy and practice of suspending professional golfers who participate in LIV Golf tournaments, it would have the purposes and effects of retarding entry by and excluding competition from LIV Golf and preserving and maintaining Defendant PGA TOUR's monopoly power. Thus, even a unilateral suspension by Defendant PGA TOUR of professional golfers who participate in LIV Golf tournaments would be exclusionary, anticompetitive, and dangerously likely to succeed in preserving and maintaining Defendant PGA TOUR's monopoly power. For these reasons, even without engaging in concerted action with Defendant DP WORLD TOUR and co-Defendants and joint tortfeasors MONAHAN and PELLECY, Defendant PGA TOUR is engaged in an unlawful attempt to monopolize the relevant market in violation of Section 542.19 of the Florida Antitrust Act, Fla. Stat. § 542.19.

63. Defendants PGA TOUR's attempt to monopolize the United States market for organizing, sanctioning, and offering spectators admission to professional golf tournaments has caused Plaintiff KLAYMAN and the proposed plaintiff class to suffer antitrust injury, that is, injury of the type the Florida antitrust laws are intended to prevent, by maintaining supracompetitive prices for spectator admission to PGA organized and sanctioned golf tournaments in the United States.

FIFTH CAUSE OF ACTION

Civil Conspiracy

64. Plaintiff KLAYMAN re-alleges and incorporates by reference the allegations in the preceding paragraphs of this Complaint as if fully set forth herein.

65. Defendants PGA TOUR, DP WORLD TOUR, MONAHAN, and PELLEY have engaged in a civil conspiracy and acted in concert with each other in order to (i) refuse to deal with professional golfers who participate in LIV Golf tournaments; (ii) divide between Defendants PGA TOUR and DP WORLD TOUR their respective United States and European markets for organizing, sanctioning, and offering spectators admission to professional golf tournaments; (iii) enable and facilitate Defendant PGA TOUR's monopolization of the United States market for organizing, sanctioning, and offering spectators admission to professional golf tournaments; and (iv) enable and facilitate Defendant PGA TOUR's attempt to monopolize the United States market for organizing, sanctioning, and offering spectators admission to professional golf tournaments, all as set forth in the Background and Facts and the First through Fourth Causes of action above.

66. These are unlawful acts, and the Defendants have done these unlawful acts using unlawful means.

67. The Defendants have performed overt acts in furtherance of this civil conspiracy, as set forth in the Background and Facts and the First through Fourth Causes of Action above.

68. Plaintiff KLAYMAN and the proposed plaintiff class have been damaged as a result of the overt acts performed in furtherance of Defendants' civil conspiracy described above.

ANTITRUST INJURY AND DAMAGES

69. Defendants' concerted refusal to deal, horizontal market division, monopolization, and attempt to monopolize described in the First through Fourth Causes of Action above and the civil conspiracy described in the Fifth Cause of Action above have caused Plaintiff KLAYMAN and the proposed plaintiff class to suffer antitrust injury, that is, injury of the type the Florida antitrust laws are intended to prevent, by maintaining supracompetitive prices for spectator admission to PGA TOUR organized and sanctioned golf tournaments in the United States.

70. This action seeks actual and compensatory damages, in an amount to be determined, but in any event greater than \$30,000.00, for the harm caused to Plaintiff KLAYMAN and the proposed plaintiff class by Defendants' violations (as set forth in the First through Fourth Causes of Action above) of Sections 542.18 and 542.19 of the Florida Antitrust Act, Fla. Stat. §§ 542.18, 542.19, and by Defendants' civil conspiracy (as set forth in the Fifth Cause of Action above), said actual and compensatory damages to be trebled pursuant to Section 542.22(1) of the Florida Antitrust Act, Fla. Stat. § 542.22(1).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff KLAYMAN, in his individual capacity, and on behalf of the proposed plaintiff class, prays for judgment against Defendants, jointly and severally, as follows:

A. Pursuant to Section 542.22 of the Florida Antitrust Act, Fla. Stat. § 542.22, awarding to Plaintiff KLAYMAN and the proposed plaintiff class actual and compensatory damages in an amount to be determined, but in any event greater than \$30,000.00, said actual and compensatory damages to be trebled in accordance with Section 542.22 of the Florida Antitrust Act, Fla. Stat. § 542.22.

B. Pursuant to Section 542.23 of the Florida Antitrust Act, Fla Stat. § 542.23, entry of permanent injunctive relief prohibiting the Defendants from continuing the unlawful conduct set forth in the First through Fifth Causes of Action above and prohibiting their continued violation of the Florida Antitrust Act.

C. Pursuant to Section 542.22 and 542.23 of the Florida Antitrust Act, Fla Stat. §§ 542.22, 542.23, awarding Plaintiff KLAYMAN and the proposed plaintiff class the cost of suit, including reasonable attorneys' fees.

PLAINTIFF DEMANDS TRIAL BY JURY ON ALL CLAIMS SO TRIABLE.

Dated: June 28, 2022

Respectfully submitted,

/s/ Larry Klayman

Larry Klayman, Esq.

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