

Warnock v. National Football League

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The plaintiff, Robert Warnock, a taxpayer residing in Allegheny County, brought suit against the National Football League ("NFL") in the District Court for the Western District of Pennsylvania, claiming that the NFL violated the Sherman Antitrust and Clayton Acts by forcing Allegheny County to pay to build Heinz Field and offer the Pittsburgh Steelers more profitable lease terms than the market demanded. The NFL argued that Warnock lacked standing as a mere county taxpayer to bring the claim in federal court. The district court agreed with the NFL and dismissed the suit for lack of standing.

The court ruled that Warnock needed to fulfill traditional Article III standing and survive prudential limitations to maintain the action or gain third party standing. Article III standing requires a plaintiff to allege sufficient injury in fact, fairly traceable to the actions of the defendant that can be redressed by the courts. A hypothetical injury is not sufficient for third party standing. Applicable prudential limitations on the right to maintain an action require a plaintiff to assert his own legal interests instead of third parties and a court to refrain from adjudicating generalized grievances. Additionally, third party taxpayer standing exists only when the claimant sues a government entity or representative or seeks only equitable relief. The court rested on precedent, holding a single taxpayer in a third party suit must have a proximate, individual, and addressable injury to gain standing.

The court determined Warnock's only injury was not fairly traceable to the NFL's conduct. Rather, he could only prove his tax dollars were being spent on a disputed practice. For Warnock to recover, he could only sue an entity for mispending the tax dollars, not for receiving them. The NFL lacked the power to levy and collect taxes from the citizens of Allegheny County. Thus, Warnock only had standing to sue Allegheny County, not the NFL, for funding the construction of Heinz Field. The court also found that Warnock's claim was a generalized grievance that failed to meet the prudential requirements for standing. Moreover, because Warnock brought suit against a private entity, no third party taxpayer standing existed to allow his suit to continue. The court's ruling effectively blocked the ability of any municipal taxpayer to bring suit against a private entity that received tax dollars from a local government.

The court concluded Warnock lacked standing to bring suit as a municipality taxpayer against the NFL for violation of the Sherman Antitrust and Clayton Acts and dismissed his claim. In denying standing, the court declined to discuss whether the NFL, which does not enjoy any sort of antitrust exemption, has engaged in practices in violation of the Sherman Act. The ruling, however, established that such a claim must be brought by the municipality suffering the expense of stadium construction to keep a team in the city. The municipality is the only entity that suffers a sufficient injury to gain standing.