SUPREME COURT OF THE UNITED STATES

Seminole Tribe of Florida v. Florida

517 U.S. 44 (1996) · No. No. 94-12 · Decided March 27, 1996

SUMMARY

The United States Supreme Court held that Congress lacked authority under the Indian Commerce Clause to abrogate the States' sovereign immunity for suits brought under the Indian Gaming Regulatory Act. The Court also held that the Ex parte Young doctrine did not permit the Tribe to enforce the Act's good-faith negotiation requirement against Florida's Governor. The Court affirmed the Eleventh Circuit's dismissal of the Seminole Tribe's suit.

CASE DETAILS

COURT	Supreme Court of the United States
WRITING FOR THE COURT	William H. Rehnquist, Chief Justice; Sandra Day O'Connor, Justice; Antonin Scalia, Justice; Anthony M. Kennedy, Justice; Clarence Thomas, Justice; John Paul Stevens, Justice; David H. Souter, Justice; Ruth Bader Ginsburg, Justice; Stephen G. Breyer, Justice
JURISDICTION	Federal
DECIDED	March 27, 1996
DOCKET	No. 94-12
DISPOSITION	affirmed
PROCEDURAL POSTURE	The Seminole Tribe sued Florida and Governor Lawton Chiles under the Indian Gaming Regulatory Act, seeking to compel good-faith negotiations for a Tribal-State gaming compact. The district court denied the defendants' motion to dismiss on sovereign-immunity grounds. The Eleventh Circuit reversed and directed dismissal for lack of subject-matter jurisdiction. The Supreme Court granted certiorari.
STANDARD OF REVIEW	The sovereign-immunity and Ex parte Young issues were reviewed as questions of federal jurisdiction and constitutional law.
PARTIES	Seminole Tribe of Florida v. Florida, Lawton Chiles, Governor of Florida

QUESTIONS PRESENTED

1. Whether Congress may abrogate a State's Eleventh Amendment sovereign immunity pursuant to its power under the Indian Commerce Clause.
2. Whether the Ex parte Young doctrine permits an Indian tribe to sue a State's Governor for prospective injunctive relief enforcing the Indian Gaming Regulatory Act's good-faith negotiation requirement.

HOLDINGS

1. Although Congress unmistakably intended the Indian Gaming Regulatory Act to abrogate the States' sovereign immunity, the Indian Commerce Clause does not grant Congress authority to abrogate that immunity. Accordingly, 25 U.S.C. § 2710(d)(7) cannot confer federal jurisdiction over an unconsenting State.
2. Ex parte Young does not permit the Tribe to sue the Governor of Florida to compel compliance with the Indian Gaming Regulatory Act's good-faith negotiation requirement where Congress enacted a detailed remedial scheme specifically governing enforcement of that right.

KEY QUOTATIONS

> *"We hold that notwithstanding Congress' clear intent to abrogate the States' sovereign immunity, the Indian Commerce Clause does not grant Congress that power, and therefore § 2710(d)(7) cannot grant"* (517 U.S. at 47)

FACTUAL BACKGROUND

The Indian Gaming Regulatory Act requires a State to negotiate in good faith with an Indian tribe toward a Tribal-State compact governing class III gaming. The Seminole Tribe alleged that Florida refused to enter negotiations concerning specified gaming activities. The Tribe sued Florida and its Governor after the statutory 180-day period had passed, seeking enforcement of the negotiation requirement.

PROCEDURAL HISTORY

The Tribe filed suit in federal district court in September 1991, alleging that Florida refused to negotiate in good faith as required by the Indian Gaming Regulatory Act. The district court denied Florida's motion to dismiss, but the Eleventh Circuit held that the Eleventh Amendment barred the action and that Ex parte Young did not permit the claim against the Governor. The Supreme Court affirmed the Eleventh Circuit.

DISPOSITION

affirmed
