

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	
	:	
v.	:	11 Civ. 2564 (LBS)
	:	
POKERSTARS, et al.,	:	VERIFIED CLAIM OF
Defendants;	:	KOLYMA CORPORATION A.V.V.
	:	AND VANTAGE LTD PURSUANT
ALL RIGHT, TITLE AND INTEREST IN	:	TO RULE G OF THE
THE ASSETS OF POKERSTARS, et al.,	:	SUPPLEMENTAL RULES
	:	FOR ADMIRALTY AND
Defendants-in-rem.	:	MARITIME CLAIMS
	:	

PLEASE TAKE NOTICE that Defendants, Kolyma Corporation A.V.V. (“Kolyma”) and Vantage Ltd. (“Vantage”), as the United States facing operators for Full Tilt Poker (the “Full Tilt Operators”), pursuant to 18 U.S.C. § 983(a)(4) and Rule G(5)(a), Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, hereby assert, under penalty of perjury, right, title and interest in, and make a claim upon, the property identified below in the above-captioned case.

1. The Full Tilt Operators have right, title, or interest in the following accounts in the amount of approximately \$25,297,322.00 USD:
 - A. account numbered 12900584 held at Sunfirst Bank, St. George, Utah, formerly in the name of Sunfirst Bank ITF Powder Monkeys/Full Tilt, now in the name of Sunfirst Bank, and all funds- traceable thereto;
 - B. any other accounts seized at Sunfirst Bank, St. George, Utah, formerly in the name of Sunfirst Bank ITF Powder Monkeys/Full Tilt or a related entity, now in the name of Sunfirst Bank, and all funds traceable thereto.

2. The Full Tilt Operators have right, title, or interest in the following accounts in the amount of approximately \$14,740,855.00 USD:

- A. account numbered 200003291 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto;
 - B. account numbered 200003317 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto;
 - C. account numbered 200003325 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto;
 - D. account numbered 200003309 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto;
 - E. account number 953500105 at Bank One Utah, in the name of 4 A Consulting, and all funds traceable thereto;
 - F. account numbered 32433 at New City Bank in the name of 21Debit LLC dba PS Payments, and all funds traceable thereto;
 - G. account numbered 32441 at New City Bank in the name of 21Debit LLC dba FLT Payments, and all funds traceable thereto;
 - H. account number 32506 at New City Bank in the name of 21Debit LLC, and all funds traceable thereto; and
 - I. any other account seized by the government pursuant to the above captioned forfeiture in rem action that contains properties held in the name of 21Debit LLC or a related entity and all property traceable thereto.
3. The Full Tilt Operators have right, title, or interest to funds in the following accounts:
- A. account numbered 972402309 held at UMPQUA Bank, Roseburg, Oregon, in the name of "ULTRA SAFE PAY," and all property traceable thereto;
 - B. account numbered 004-411-346034-838 held at Hong Kong and Shanghai Banking Corporation, Hong Kong, in the name of Griting Investments LTD, and all funds traceable thereto.
4. The Full Tilt Operators have right, title, or interest in the following accounts in the amount of approximately \$9,655,075.00 USD:
- A. account numbered 1093 held at Vensure Federal Credit Union, Mesa, Arizona, in the name of Trinity Global Commerce Corp.
 - B. account numbered 1200402039 held at Banca Privada D'Andorra, Andorra, in the name of Trinity Global Commerce Corp., and all funds traceable thereto;

- C. account numbered MT54SBMT55505000000016782GAUSDO held at Sparkasse Bank Malta PLC, Malta, in the name of Trinity Global Commerce Corp., and all funds traceable thereto; and
 - D. any other account seized by the government pursuant to the above captioned forfeiture in rem action that contains properties held in the name of Trinity Global Commerce Corp. or a related entity and all property traceable thereto.
5. The Full Tilt Operators have right, title, or interest in the following accounts in the amount of approximately \$9,632,834.00 USD:
- A. \$231,000.00 formerly on deposit at First Republic Bank in account numbered 80000373283, held in the name of G.I. Holdings and all property traceable thereto;
 - B. \$124,178.72 formerly on deposit at Service 1st Bank of Nevada in account numbered 2020003792 held in the name of G.I. Holdings and all property traceable thereto;
 - C. \$2,057,620.28 formerly on deposit at Wells Fargo Bank in account numbered 5383346862 held in the name of G.I. Holdings and all property traceable thereto;
 - D. \$3,055,108.21 formerly on deposit at Citibank in account numbered 203023239 held in the name of G.I. Holdings and all property traceable thereto;
 - E. \$784,160.95 formerly on deposit at Citibank in account numbered 203118542 held in the name of G.I. Holdings and all property traceable thereto;
 - F. \$1,000.00 formerly on deposit at Citibank in account . numbered 203118559 held in the name of G.I. Holdings and all property traceable thereto;
 - G. \$925.00 formerly on deposit at Citibank in account numbered 203118575 held in the name of G.I. Holdings and all property traceable thereto;
 - H. \$1,035,415.44 formerly on deposit at Nevada Commerce Bank in account numbered 0021002712 held in the name of G.I. Holdings and all property traceable thereto;
 - I. \$122,308.78 formerly on deposit at Nevada Commerce Bank in account numbered 0021002795 held in the name of G.I. Holdings and all property traceable thereto;
 - J. \$3,029,711.94 formerly on deposit at City National Bank in account Number 3701177950, held in the name of G.I. and all property traceable thereto; and

- K. any other account seized by the government pursuant to the above captioned forfeiture in rem action that contains properties held in the name of G.I. Holdings or a related entity and all property traceable thereto.
6. The Full Tilt Operators have right, title, or interest in the following accounts in the amount of approximately \$4,916,977.00 USD:
- A. \$30.27 formerly on deposit at Huntington National Bank in account numbered 01662184444. held in the name of SNR, Inc. and all property traceable thereto;
 - B. \$1,057,797.29 formerly on deposit at Huntington National Bank in account numbered 01662184457 held in the name of SNR, Inc. and all property traceable thereto;
 - C. \$649,261.20 formerly on deposit at Huntington National Bank in account numbered 01662191343 held in the name of SNR, Inc. and all property traceable thereto;
 - D. \$199,175.14 formerly on deposit at Bank of West in account numbered 658049382 held in the name of SNR, Inc. and all property traceable thereto;
 - E. \$4,925.00 formerly on deposit at Bank of America in account numbered 0952071585 held in the name of SNR, Inc. and all property traceable thereto;
 - F. \$25.00 formerly on deposit at Bank of America account numbered 0952071603, held in the name of SNR, Inc. and all property traceable thereto;
 - G. \$992,499.53 formerly on deposit at Citibank in account numbered 203366638 held in the name of SNR, Inc. and all property traceable thereto;
 - H. \$865,000.00 formerly on deposit at Bank of America in account numbered 0952071467, held in the name of SNR, Inc. and all property traceable thereto; and
 - I. any other account seized by the government pursuant to the above captioned forfeiture in rem action that contains properties held in the name of SNR, Inc. or a related entity and all property traceable thereto.
7. The Full Tilt Operators have right, title, or interest in the following accounts in the amount of approximately \$23,696,003.00 USD:
- A. \$410,449.93 formerly on deposit at Bank of America account numbered 229006067857 held in the name of Viable Marketing Corp. and all property traceable thereto;

- B. \$8,168,168.89 formerly on deposit at Fifth Third Bank in account numbered 7431859508, held in the name of Viable Marketing Corp. and all property traceable thereto;
 - C. \$40,960.86 formerly on deposit at Fifth Third Bank in account numbered 7432618069, held in the name of Viable Marketing Corp. and all property traceable thereto;
 - D. all funds formerly on deposit at National Bank of California in account numbered 2547716 in the name of Viable Processing Solutions, and all property traceable thereto;
 - E. all funds formerly on deposit at National Bank of California in account Number 2778815 held in the name of Viable Processing Solutions, and all property traceable thereto; and
 - F. any other account seized by the government pursuant to the above captioned forfeiture in rem action that contains properties held in the name of Viable Processing Solutions or a related entity and all property traceable thereto.
8. The Full Tilt Operators have right, title, or interest in the following accounts in the amount of approximately \$10,337,474.00 USD:
- A. all funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520055501, held in the name of LST Financial, and all property traceable thereto;
 - B. all funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520057101, held in the name of LST Financial, and all property traceable thereto;
 - C. all funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520064401, held in the name of LST Financial, and all property traceable thereto;
 - D. all funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520065201, held in the name of LST Financial, and all property traceable thereto;
 - E. all funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520069501, held in the name of LST Financial, and all property traceable thereto; and
 - F. any other account seized by the government pursuant to the above captioned forfeiture in rem action that contains properties held in the name of LST Financial or a related entity and all property traceable thereto.

9. Furthermore, Vantage has right, title, or interest to all funds in the following accounts:
 - A. account held at Banque Invik SA, Luxembourg, in the name of Vantage Limited, IBAN LU811944013080000USD, and all funds traceable thereto;
 - B. any account held at Basler Kantonal Bank, Switzerland, in the name of Vantage Ltd., and all funds traceable thereto.
10. Furthermore, Kolyma has right, title, or interest to all funds in the following accounts:
 - A. account numbered E3451230800000007283 held at Wirecard Bank AG, Germany, in the name of Kolyma Corporation, and all funds traceable thereto;
 - B. account numbered E7951230800000007249 held at Wirecard Bank AG, Germany, in the name of Kolyma Corporation, and all funds traceable thereto;
11. Furthermore, the Full Tilt Operators have right, title, or interest in any other account seized by the government pursuant to the above captioned forfeiture in rem action that contains properties subject to Vantage's legal and equitable ownership or Kolyma's legal and equitable ownership.
12. The Full Tilt Operators have legal, equitable, and/or beneficial ownership interests to the funds referenced in paragraphs 1 through 8. Those accounts contain funds deposited by Full Tilt Poker players to be transferred to Vantage and/or Kolyma or funds deposited by Vantage and/or Kolyma that were in the process of being returned to Full Tilt Poker players. Vantage is the lawful owner and account holder of record of the funds in the bank accounts referenced in paragraph 9. Kolyma is the lawful owner and account holder of record of the funds in the bank accounts referenced in paragraph 10.
13. Vantage Ltd. is an Alderney company with its principal place of business in Guernsey, Alderney.
14. Kolyma Corporation, A.V.V. is an Aruban corporation with its principal place of business in Oranjestad, Aruba.

15. Pursuant to Rule E(8) of the Supplemental Rules, Kolyma and Vantage appear before this Court for the limited purpose of defending against claims initiated by the government in the above-captioned in rem action. Kolyma and Vantage's appearance in the above-captioned action does not constitute an appearance for the purpose of any other claim or consent to the jurisdiction of this court or any other court over Kolyma or Vantage.
16. As an authorized agent of claimants, Kolyma Corporation A.V.V. and Vantage Ltd., I, CHRIS FERGUSON, hereby verify that the foregoing facts are true and correct and made under penalty of perjury.

Pursuant to the provisions of 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 14 of November, 2011

Chris Ferguson
Chris Ferguson
Chris Ferguson

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on November 14, 2011, I caused a true copy of the foregoing Verified Claim Pursuant to Rule G(5)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims to be served by the Court's ECF system upon:

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/s/ L. Barrett Boss

L. Barrett Boss