

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

PLEASE TAKE NOTICE that Defendant, Tiltware LLC. ("Tiltware"), 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 asserts, under penalty of perjury, right, title and interest in, and makes a claim upon, the property identified below in the above-captioned case.

1. Tiltware has right, title, or interest to all funds in the following accounts:
 - A. account numbered 1892947126 held at Comerica Bank, Dallas, Texas, in the name of Tiltware, and all funds traceable thereto;
 - B. account numbered 1892947134 held at Comerica Bank, Dallas, Texas, in the name of Tiltware, and all funds traceable thereto;

2. Tiltware has 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.
3. Tiltware has 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.
4. Tiltware has 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.

5. Tiltware has 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.

6. Tiltware has 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.
7. Tiltware has 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.
8. Tiltware has 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.
 9. Tiltware has 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;

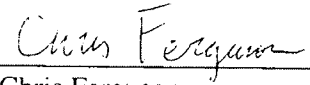
- C. all funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520064401, held in the name of LST Financial, and all property traceable thereto;
 - D. all funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, 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.
10. Tiltware has 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 Tiltware's legal, equitable and/or beneficial ownership.
11. Tiltware has a right, title, or interest in all of its tangible and intangible assets, including intellectual property related to Full Tilt Poker and related entities.
12. Tiltware has legal, equitable and/or beneficial ownership interests in various companies (set out in Schedule A of the Government's First Amended Complaint), including interests in Pocket Kings Ltd., Pocket Kings Consulting Ltd., Filco Ltd., Vantage Ltd., Ranston Ltd., Mail Media Ltd., and Kolyma Corporation A.V.V. Tiltware also claims ownership in the domain names related to Full Tilt Poker (www.fulltiltpoker.com) which the government seeks to forfeit. Tiltware also claims ownership in any and all intellectual property related to Full Tilt Poker and related entities.
13. Tiltware is the lawful owner and the party that held legal title to the bank accounts referenced in paragraph 1 prior to the seizure.
14. Tiltware has legal, equitable, and/or beneficial ownership interests in each of the bank accounts referenced in paragraphs 2 through 10. Those accounts contain funds deposited

by Full Tilt Poker players to be transferred to Tiltware related entities or funds deposited by Tiltware related entities that were in the process of being returned to Full Tilt Poker players.

15. Tiltware LLC is a California corporation with its principal place of business in Los Angeles, California.
16. As an authorized agent of claimant Tiltware LLC., 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

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:

Jason H. Cowley
United States Attorneys Office
One Saint Andrew's Plaza
New York, NY 10007
Tel: (212) 637-1060
Fax: (212) 637-0421
Jason.Cowley@usdoj.gov

/s/ L. Barrett Boss
L. Barrett Boss