## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

11 Civ. 2564 (LBS)

٧.

POKERSTARS, et al.,

Defendants, :

POCKET KINGS LTD AND POCKET KINGS CONSULTING

VERIFIED CLAIM OF

LTD PURSUANT TO RULE G
OF THE SUPPLEMENTAL

ALL RIGHT, TITLE AND INTEREST IN THE ASSETS OF POKERSTARS, et al.,

RULES FOR ADMIRALTY

AND MARITIME CLAIMS

:

Defendants-in-rem.

:

PLEASE TAKE NOTICE that Defendants, Pocket Kings Ltd. and Pocket Kings Consulting Ltd. ("Pocket Kings"), 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 makes a claim upon, the property identified below in the above-captioned case.

- 1. Pocket Kings has right, title, or interest to all funds in the following accounts:
  - A. account numbered 99045014801116 held at Bank of Scotland Ireland, Inc., Ireland, in the name of Pocket Kings Consulting LTD, and all funds traceable thereto;
  - B. account numbered 99022000439546 held at National Irish Bank, Ireland, in the name of Pocket Kings Ltd, and all funds traceable thereto;
  - C. account numbered 99022000440162 held at National Irish Bank, Ireland, in the name of Pocket Kings Ltd, and all funds traceable thereto;
  - D. account numbered IE58IPBS9906291390203 held at Irish Permanent Treasury, PLC, in the name of Pocket Kings, and all funds traceable thereto;

- E. account numbered IE07DABA95151340074209 held at National Irish Bank in the name of Pocket Kings Limited, and all funds traceable thereto;
- F. account numbered IE38DABA95151340025151 held at National 'Irish Bank in the name of Pocket Kings Limited, and all funds traceable thereto;
- G. account numbered IE42DABA95151340062618 held at National Irish Bank in the name of Pocket Kings Limited, and all funds traceable thereto;
- H. account numbered IE581PBS99062913190203 held at Irish Permanent Treasury in the name of Pocket Kings Limited, and all funds traceable thereto;
- I. account numbered 1E67AIBK93208626257031 held at Allied Irish Bank in the name of Pocket Kings, and all funds traceable thereto;
- J. account numbered LU621944013130000USD held at Banque Invik, Luxemburg, held in the name of Pocket Kings Limited, and all funds traceable thereto; and
- K. account numbered IE07DABA951513.40.074209 held at Danske Bank A/S, Denmark, held in the name Pocket Kings Ltd., and all funds traceable thereto.
- 2. Pocket Kings 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 Pocket Kings' legal and equitable ownership.
- 3. Pocket Kings 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.
- 4. Pocket Kings is the lawful owner and the party that held legal title to the bank accounts referenced in paragraph 1 prior to the seizure.
- Pocket Kings Ltd. is an Irish company with its principal place of business in Dublin,
   Ireland.
- 6. Pocket Kings Consulting Ltd. is an Irish company with its principal place of business in Dublin, Ireland.
- 7. Pursuant to Rule E(8) of the Supplemental Rules, Pocket Kings Ltd. and Pocket Kings Consulting Ltd. appear before this Court for the limited purpose of defending against

claims initiated by the government in the above-captioned in rem action. Pocket Kings Ltd. and Pocket Kings Consulting Ltd.'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 Pocket Kings Ltd. or Pocket Kings Consulting Ltd..

8. As an authorized agent of claimants Pocket Kings Ltd. and Pocket Kings Consulting 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

## **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