

PREET BHARARA
United States Attorney for the
Southern District of New York
By: MICHAEL D. LOCKARD
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

UNITED STATES OF AMERICA,

-v-

Pokerstars, et al

Defendant.

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DECLARATION OF PUBLICATION

11 Cv. 2564 (LBS)

I, MICHAEL D. LOCKARD, pursuant to Title 28, United States Code, Section 1746, hereby declare under the penalty of perjury:

That I am an Assistant United States Attorney in the office of the United States Attorney for the Southern District of New York, and

That attached to this declaration are (1) a true and correct copy of a notice of civil forfeiture in this action, (2) a true and correct copy of an Advertisement Certification Report, indicating that the aforementioned notice was posted on an official government internet site (www.forfeiture.gov) for at least 30 consecutive days, beginning on May 16, 2011, as required by Rule G(4) (a) (iv) (C) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and

Attachment 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
COURT CASE NUMBER: 11 CIV. 2564 LBS; NOTICE OF FORFEITURE ACTION**

Pursuant to 18 U.S.C. § 981, the United States filed a verified Complaint for Forfeiture against the following property:

\$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 (09-FBI-004840)

\$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 (09-FBI-004855)

\$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 (10-FBI-000118)

\$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 (10-FBI-000119)

\$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 (10-FBI-000121)

\$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; (10-FBI-000174)

\$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 (10-FBI-000248)

\$25.00 formerly on deposit at Bank of America account numbered 0952071603, held in the name of SNR, Inc. and all property traceable thereto (10-FBI-000249)

\$992,499.53 formerly on deposit at Citibank in Account numbered 203366638 held in the name of SNR, Inc. and all property traceable thereto (10-FBI-000250)

\$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 (10-FBI-000251)

\$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 (10-FBI-000262)

\$33,743.75 formerly on deposit at Bank of America Account numbered 003678667131 held in the name of EZO, LLC and all property traceable thereto (10-FBI-000263)

\$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 (10-FBI-000349)

\$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 (10-FBI-000350)

\$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 (10-FBI-000407)

\$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 (10-FBI-002096)

\$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 (10-FBI-002215)

\$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 (10-FBI-002453)

\$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 (10-FBI-002454)

\$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 (10-FBI-002455)

\$925.00 formerly on deposit at Citibank in account numbered 203118575 held in the name of G.I. Holdings and all property traceable thereto (10-FBI-002456)

\$447,196.79 from account numbered 804815470 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto (10-FBI-005035)

\$12,642.44 from account numbered 804815488 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto (10-FBI-005036)

\$4,472.58 from account numbered 822823779 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto (10-FBI-005037)

\$84.21 from account numbered 822824025 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto (10-FBI-005038)

\$6,047.84 from account numbered 822824140 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto (10-FBI-005039)

\$17,460.95 from account numbered 1003245502 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto (10-FBI-005040)

\$8,018.04 from Bank Account numbered 9105709543 in the name of Autoscribe Corporation at Citibank, N.A. and all property traceable thereto (10-FBI-005324)

\$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 (11-FBI-001655)

account numbered 27351910081015 held at Credit Agricole (Suisse) SA, Switzerland, in the name of Sphene International Limited, IBAN CH8908741014319300001, and all funds traceable thereto (11-FBI-002706)

account held at Credit Agricole (Suisse) SA, Switzerland, in the name of Sphene (International) Limited, IBAN CH6208741014319300002, and all funds traceable thereto (11-FBI-002707)

all accounts held at Bank Hapoalim (Suisse) SA, Luxembourg, in the name of Sphene International, and all funds traceable thereto (11-FBI-002708)

account held at Credit Agricole (Suisse) SA, Switzerland, in the name of the Oldford Group Limited, IBAN CH1508741014093800001, and all funds traceable thereto (11-FBI-002709)

Account numbered 1892947126 held at Comerica Bank, Dallas, Texas, in the name of Tiltware, and all funds traceable thereto (11-FBI-002710)

Account number 1892947134 held at Comerica Bank, Dallas, Texas, in the name Tiltware, and all funds traceable thereto (11-FBI-002711)

Account numbered E34512308000000007283 held at Wirecard Bank AG, Germany, in the name of Kolyma Corporation, and all funds traceable thereto (11-FBI-002712)

Account numbered E79512308000000007249 held at Wirecard Bank AG, Germany, in the name of Kolyma Corporation, and all funds traceable thereto (11-FBI-002713)

Account held at Basler Kantonal Bank, Switzerland, in the name of Ranston Ltd. IBAN CH4900770016542263375, and all funds traceable thereto (11-FBI-002714)

Account held at the Basler Kantonal Bank, Switzerland, in the name of Ranston LTD, IBAN CH7000770016542254461, and all funds traceable thereto (11-FBI-002715)

Account held at Basler Kantonal Bank, Switzerland, in the name of Mailmedia, numbered CH7300770252534932001, and all funds traceable thereto (11-FBI-002716)

Account held at Banque Invik SA, Luxembourg, in the name of Vanatge Limited, IBAN LU811944013080000USD, and all funds traceable thereto (11-FBI-002717)

Account held at Basler Kantonal Bank, Switzerland, in the name of Vantage Ltd. and all funds traceable thereto (11-FBI-002718)

Account held at Allied Irish Bank in the name of Filco Ltd. IBAN IE85AIBK93006727971082, and all funds traceable thereto (11-FBI-002719)

Account held at WestLB AG, Germany, in the name of Filco Ltd, IBAN DE19512308000000007262 and all funds traceable thereto (11-FBI-002720)

Account numbered MT23SBMT5550500000001108 held at Sparkasse Bank Malta in the name of Blue Water Services Ltd, and all funds traceable thereto (11-FBI-002721)

Account numbered MT14SBMT55505000000011451GAEURO held at Sparkasse Bank Malta in the name Tokwiro Enterprises ENRG, and all funds traceable thereto (11-FBI-002764)

Account numbered 61-12-9436-6 held at Banco Pananemo De La Vivienda SA, Panama, in the name of Disora Investment, Inc. and all funds traceable thereto (11-FBI-002765)

Account numbered 0011271083 held at citibank London, England in the name of Mundial Valores, for the benefit of Disora Investments, Inc., MAM000804 and all funds traceable thereto (11-FBI-002766)

Account numbered CH4308755011432400000 held at Pictet and Co., Switzerland, in the name of Rintrade Finance SA and all funds traceable thereto (11-FBI-002767)

Account numbered 99045014801116 held at Bank of Scotland Ireland, Inc., Ireland, in the name of Pocket Kings Consulting LTD, and all funds traceable thereto

(11-FBI-002777)

account numbered 99022000439546 held at National Irish Bank, Ireland, in the name of Pocket Kings Ltd, and all funds traceable thereto (11-FBI-002778)

Account numbered 99022000440162 held at National Irish Bank, Ireland, in the name of Pocket Kings Ltd, and all funds traceable thereto (11-FBI-002779)

Account numbered IE8IPBS9906291390203 held at Irish Permanent Treasury, PLC in the name of Pocket Kings and all funds traceable thereto (11-FBI-002780)

Account numbered IE07DABA95151340074209 held at National Irish Bank in the name of Pocket Kings limited and all funds traceable thereto Acct# IE07DABA95151340074209 (11-FBI-002783)

Account numbered IE38DABA95151340025151 held at National Irish Bank in the name of Pocket Kings Limited and all funds traceable thereto (11-FBI-002784)

Account numbered IE42DABA95151340062618 held at National Irish Bank in the name of Pocket Kings Limited and all funds traceable thereto (11-FBI-002785)

Account numbered IE58IPBS99062913190203 held at Irish Permanent Treasury in the name of Pocket Kings Limited and all funds traceable thereto (11-FBI-002786)

Account numbered IE67AIBK93208626257031 held at Allied Irish Bank in the name of Pocket Kings and all funds traceable thereto (11-FBI-002787)

Account numbered LU621944013130000USD held at Banque Invik, Luxemburg, held in the name of Pocket Kings Limited, and all funds traceable thereto (11-FBI-002811)

Account numbered IE07DABA95151340074209 held at Danske Bank A/S, Denmark, held in the name of Pocket Kings Ltd. and all funds traceable thereto Acct# IE07DABA95151340074209 (11-FBI-002812)

account numbered 121015408 held at Sunfirst Bank, St. George, Utah, in the name of Triple Seven LP d/b/a Netwebfunds.com, and all funds traceable thereto (11-FBI-002814)

Account numbered 121015390 held at Sunfirst Bank, St. George, Utah, in the name of Triple Seven d/b/a A Web Debit, and all funds traceable thereto (11-FBI-002815)

Account numbered 27351910081015 held at Societe Generale Cyprus LTD, Ctprys, in the name of Golden Shores Properties Limited and all funds traceable thereto (11-FBI-002816)

Account numbered CY1211501001065983USDCACC002 held at FBME Bank LTD, Cyprus, in the name of Triple Seven Inc., and all funds traceable thereto (11-FBI-002817)

Account numbered 5510045221 held at Wells Fargo, N.A.. in the name of Kombi Capital, and all funds traceable thereto (11-FBI-002818)

Account numbered 7478010312 held at Wells Fargo, N.A. in the name of Kombi Capital and all funds traceable thereto (11-FBI-002819)

Account numbered 12900584 held at Sunfirst Bank, St. George, Utah, formerly in the name of Sunfirst Bank ITF Powder Money/Full Tilt, now in the name of Sunfirst Bank and all funds traceable thereto (11-FBI-002820)

Account numbered 129000576 on deposit at Sunfirst Bank, St. George, Utah. Formerly in the name of Sunfirst bank ITF Mastery Merchant/Psaars, now in the name of Sunfirst bank, and all funds traceable thereto (11-FBI-002821)

Account numbered 200003291 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto (11-FBI-002822)

Account numbered 200003317 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto (11-FBI-002823)

Account numbered 200003325 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC and all funds traceable thereto (11-FBI-002824)

Account number 200003309 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto (11-FBI-002825)

Account number 201002907 at Barclays Bank, UK in the name of Hotwire Financial LLC, and all funds traceable thereto (11-FBI-002826)

Account number GB26BARC20473563472044 at Barclays Bank, UK, in the name of Hotwire Financial LTD, and all funds traceable thereto (11-FBI-002827)

Account number 953500105 at Bank One Utah, in the name of A4 A Consulting, and all funds traceable thereto (11-FBI-002828)

Account number 730666271, at Whitney National Bank, New Orleans, Louisiana in the name of Ndeka LLC, and all funds traceable thereto (11-FBI-002829)

Account number 2919208124 at Bank of America, N.A. in the name of Credit Capital Funding, and all funds traceable thereto (11-FBI-002830)

Account numbered 32433 at New City Bank in the name of 21Debit LLC dba PS Payments, and all funds traceable thereto (11-FBI-002831)

Account numbered 32441 at New City Bank in the name of 21Debit LLC dba FLT Payments (11-FBI-002832)

Account number 32506 at New City Bank in the name of 21Debit LLC, and all funds traceable thereto (11-FBI-002833)

Account numbered 972402309 held at UMPQUA Bank, Roseburg, Oregon, in the name of "ULTRA SAFE PAY", and all property traceable thereto (11-FBI-002834)

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 (11-FBI-002854)

Account numbered 1093 held at Vensure Federal Credit Union, Mesa, Arizon, in the name of Trinity Global Commerce Corp (11-FBI-002855)

Account numbered 1200402039 held at Banca Privada D'Andorra, Andorra, in the name of Trinity Global Commerce Corp., and all funds traceable (11-FBI-002856)

Account numbered MT54SBMT5550500000016782GAUSD0 held at Sparkasse Bank Malta PLC, Malta, in the name of Trinity Global Commerce Corp., and all funds traceable thereto (11-FBI-002857)

Account numbered 27554003786 held at Royal Bank of Canada, Canada, in the name of Terricorp Inc. d/b/a TLC Global, and all funds traceable thereto (11-FBI-002858)

Account numbered 27554003760 held at Royal Bank of Canada, Canada, in the name of Terricorp Inc. d/b/a TLC Global, and all funds traceable thereto (11-FBI-002859)

Account numbered 2775401038 held at Royal Bank of Canada, Canada, in the name of Terricorp Inc. d/b/a TLC Global, and all funds traceable thereto (11-FBI-002860)

Account numbered 27551017789 held at Royal Bank of Canada, Canada, in the name of Terricorp Inc. d/b/a TLC Global, and all funds traceable thereto (11-FBI-002861)

Account numbered 4800198399 held at Harris Bank, Palatine, Illinois, and all funds traceable thereto (11-FBI-002862)

Account numbered GB81RBOS16630000368036 held at the Royal Bank of Scotland in the name of Voltrex Ltd., and all funds traceable thereto (11-FBI-002863)

Account numbered 2000059819596 held at Wachovia Bank, a division of Wells Fargo Bank, N.A., in the name "Eastern Expressions," and all funds traceable thereto (11-FBI-002864)

Account numbered 104773862842 held at the Bendix Foreign Exchange, Toronto, Ontario, and all funds traceable thereto (11-FBI-002865)

All right, title and interest in Defendant Entity known as PokerStars (11-FBI-003343)

All right, title and interest in Defendant Entity known as Full Tilt Poker (11-FBI-003344)

All right, title and interest in Defendant Entity known as Absolute Poker (11-FBI-003345)

All right, title and interest in Defendant Entity known as Ultimate Bet (11-FBI-003346)

All right, title and interest in Defendant Entity known as Oldford Group Ltd. (11-FBI-003347)

All right, title and interest in Defendant Entity known as Rational Entertainment Enterprises Ltd. (11-FBI-003348)

All right, title and interest in Defendant Entity known as Pyr Software Ltd. (11-FBI-003349)

All right, title and interest in Defendant Entity known as Stelekram Ltd. (11-FBI-003350)

All right, title and interest in Defendant Entity Sphene International Ltd. (11-FBI-003351)

All right, title and interest in Defendant Entity Tiltware LLC. (11-FBI-003352)

All right, title and interest in Defendant Entity Kolyma Corporation A.V.V. (11-FBI-003353)

All right, title and interest in Defendant Entity Pocket Kings Ltd. (11-FBI-003354)

All right, title and interest in Defendant Entity Pocket Kings Consulting Ltd. (11-FBI-003355)

All right, title and interest in Defendant Entity Filco Ltd. (11-FBI-003356)

All right, title and interest in Defendant Entity Vantage Ltd. (11-FBI-003357)

All right, title and interest in Defendant Entity Ranston Ltd. (11-FBI-003358)

All right, title and interest in Defendant Entity Mail Media Ltd. (11-FBI-003359)

All right, title and interest in Defendant Entity Full Tilt Poker Ltd. (11-FBI-003360)

All right, title and interest in Defendant Entity SGS Systems Inc. (11-FBI-003361)

All right, title and interest in Defendant Entity Trust Services Ltd. (11-FBI-003362)

All right, title and interest in Defendant Entity Fiducia Exchange Ltd. (11-FBI-003363)

All right, title and interest in Defendant Entity Blue Water Services Ltd. (11-FBI-003364)

All right, title and interest in Defendant Entity Absolute Entertainment, S.A.
(11-FBI-003365)

All right, title and interest in Defendant Entity Blanca Games, Inc of Antigua
(11-FBI-003366)

All right, title and interest in Defendant Internet Domain Pokerstars.com
(11-FBI-003367)

All right, title and interest in Defendant Internet Domain Fulltiltpoker.com
(11-FBI-003368)

All right, title and interest in Defendant Internet Domain Absolutepoker.com
(11-FBI-003369)

All right, title and interest in Defendant Internet Domain Ultimatebet.com
(11-FBI-003370)

All right, title and interest in Defendant Internet Domain Ub.com (11-FBI-003371)

Account held at National Bank of California, in the name of Viable Processing
Solutions, acct number 2547716, and all funds traceable thereto (11-FBI-003393)

Account held at National Bank of California, in the name of Viable Processing
Solutions, acct number 2778815, and all funds traceable thereto (11-FBI-003394)

Account held at Four Oaks Bank and Trust, in the name of LST Financial, acct number
520055501, and all funds traceable thereto (11-FBI-003395)

Account held at Four Oaks Bank and Trust, in the name of LST Financial, acct number
520057101, and all funds traceable thereto (11-FBI-003396)

Account held at Four Oaks Bank and Trust, in the name of LST Financial, acct number
520064401, and all funds traceable thereto (11-FBI-003397)

Account held at Four Oaks Bank and Trust, in the name of LST Financial, acct number
520069501, and all funds traceable thereto (11-FBI-003398)

Account held at Hawaii National Bank, in the name of MAS Inc., acct number
12008656, and all funds traceable thereto (11-FBI-003399)

All funds formerly on deposit at Four Oaks Bank and Trust Company, in account
numbered 520065201, held in the name of LST Financial, and all property traceable
thereto (11-FBI-003568)

Any person claiming a legal interest in the Defendant Property must file a verified Claim
with the court within 60 days from the first day of publication (May 16, 2011) of this
Notice on this official government internet web site and an Answer to the complaint or
motion under Rule 12 of the Federal Rules of Civil Procedure within 21 days thereafter.
18 U.S.C. § 983(h)(1) permits a court to impose a civil fine on anyone asserting an
interest in property which the court determines was frivolous.

The verified Claim and Answer must be filed with the Clerk of the Court, United States District Court, 500 Pearl Street, Room 120, New York, NY 10007, and copies of each served upon Assistant United States Attorney Michael Lockard, One St. Andrew's Plaza, New York, NY 10007, or default and forfeiture will be ordered. See, 18 U.S.C. § 983(a)(4)(A) and Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.



Advertisement Certification Report

The Notice of Publication was available on the www.forfeiture.gov web site for at least 18 hours per day between May 16, 2011 and June 14, 2011. Below is a summary report that identifies the uptime for each day within the publication period and reports the results of the web monitoring system's daily check that verifies that the advertisement was available each day.

U.S. v. Internet Gambling

Court Case No: 11 CIV. 2564 LBS
For Asset ID(s): See Attached Advertisement Copy

Consecutive Calendar Day Count	Date Advertisement Appeared on the Web Site	Total Hours Web Site was Available during Calendar Day	Verification that Advertisement existed on Web Site
1	05/16/2011	24.0	Verified
2	05/17/2011	24.0	Verified
3	05/18/2011	23.9	Verified
4	05/19/2011	23.9	Verified
5	05/20/2011	23.9	Verified
6	05/21/2011	24.0	Verified
7	05/22/2011	24.0	Verified
8	05/23/2011	24.0	Verified
9	05/24/2011	24.0	Verified
10	05/25/2011	23.9	Verified
11	05/26/2011	23.9	Verified
12	05/27/2011	24.0	Verified
13	05/28/2011	24.0	Verified
14	05/29/2011	24.0	Verified
15	05/30/2011	24.0	Verified
16	05/31/2011	24.0	Verified
17	06/01/2011	24.0	Verified
18	06/02/2011	24.0	Verified
19	06/03/2011	24.0	Verified
20	06/04/2011	24.0	Verified
21	06/05/2011	24.0	Verified
22	06/06/2011	24.0	Verified
23	06/07/2011	23.9	Verified
24	06/08/2011	24.0	Verified
25	06/09/2011	23.9	Verified
26	06/10/2011	24.0	Verified
27	06/11/2011	24.0	Verified
28	06/12/2011	24.0	Verified
29	06/13/2011	24.0	Verified
30	06/14/2011	24.0	Verified

Additional log information is available and kept in the archives for 15 years after the asset has been disposed.