

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, Plaintiff, vs. POKERSTARS, et al. Defendants; ALL RIGHT, TITLE AND INTEREST IN THE ASSETS OF POKERSTARS, et al., Defendants-in-rem.	: 11 Civ. 2564 (LBS) : : VERIFIED CLAIM OF TELAMONIAN : AJAX TRUST PURSUANT TO RULE G : OF THE SUPPLEMENTAL RULES : FOR ADMIRALTY AND MARITIME : CLAIMS : : : : : : :
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PLEASE TAKE NOTICE that Telamonian Ajax Trust (the “Trust”), through its authorized agent Orlando Medina, pursuant to 18 U.S.C. § 983 and Rule G(5)(a) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions (“Supplemental Rules”), 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. The Trust has right, title, or interest to the account numbered CH87 0875 5057 0684 0010 0 held at Pictet & Co Bankers, Switzerland, in the name of the Trust, all of the funds in that account, and all funds traceable thereto.
2. The Trust is the lawful owner and the party that held legal title to the bank account referenced in paragraph 1 prior to the seizure.
3. The Trust is an irrevocable trust organized under the laws of the British Virgin Islands. I am the sole trustee of the Trust, and am authorized to sign and execute this document for the Trust.

4. Pursuant to Rule E(8) of the Supplemental Rules, the Trust appears before this Court for the limited purpose of defending against claims initiated by the government in the above-captioned *in rem* action. The Trust'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 the Trust.

VERIFICATION

I, Orlando Medina, declare under penalty of perjury that the foregoing is true and correct.

Executed on this 28th day of November, 2011, in Portland, Oregon.



Orlando Medina

STATE OF OREGON)
) ss.:
COUNTY OF MULTNOMAH)

Sworn to before me this 28th day of November, 2011.

Olga A. Kolomiyets
Notary Public



CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on November 28, 2011, I caused a true copy of the foregoing Claim of Telamonian Ajax Trust Pursuant to Rule G of the Supplemental Rules for Admiralty and Maritime Claims to be served by the Court's ECF system upon:

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s/ Benjamin N. Souede

Benjamin N. Souede