

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

-against-

11-CV-2564 (LBS)

POKERSTARS, ET AL.

Defendants;

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

Defendants *In Rem*.

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**VERIFIED CLAIM OF CHRISTOPHER FERGUSON PURSUANT TO RULE G(5)(a)  
OF THE SUPPLEMENTAL RULES FOR ADMIRALTY AND MARITIME CLAIMS**

CHRISTOPHER FERGUSON, declares under penalty of perjury that:

1. I, Christopher Ferguson, am an individual residing in Las Vegas, Nevada. I hereby assert a claim to interests in the defendants *in rem* identified below.
2. I have legal and/or equitable and/or beneficial ownership interests in the following entities and the assets of these entities, including domain names and bank accounts, in varying percentages: Tiltware LLC, Kolyma Corporation A.V.V., Pocket Kings Ltd., Pocket Kings Consulting Ltd., Filco Ltd., and Vantage Ltd. My legal, equitable, and/or beneficial ownership interest is based on either my establishment, investment, and/or beneficial interest in these respective entities.


3. I have an ownership interest in all right, title and interest in all of the funds, and in certain funds traceable thereto, held the account numbered 40039049628 at Citibank, N.A., in my name. I have the right to make this claim by virtue of the fact that I am the owner of the claimed property.

4. I have an ownership interest in all right, title and interest in all of the funds, and in certain funds traceable thereto, held the account numbered 0500362603 at Citibank, N.A., in the name of The Ferguson Foundation, a non-profit charitable organization. I have the right to make this claim by virtue of the fact that I am the founder and Director of said 501(c)(3) private foundation which owns the claimed property.

5. I attest and declare under penalty of perjury that the information provided in this Statement of Claim is true and correct to the best of my knowledge and belief.

  
CHRISTOPHER P. FERGUSON

Sworn to before me on this 28<sup>th</sup> day of November 2011, personally appeared Chris Ferguson, who, after presenting the following identification Drivers Licence/CA, stated the forgoing facts and allegations are true and correct, done under penalties of perjury.

  
NOTARY PUBLIC  
COMMISSIONED



**JURAT**

State of CALIFORNIA  
County of Los Angeles } ss.



Subscribed and sworn to (or affirmed) before me  
this 28<sup>th</sup> day of November 2011, by  
Date Month Year

(1) Sylvia Correa  
Name of Signer(s)

(2) \_\_\_\_\_  
Name of Signer(s)

Janet Fay Canaday  
Signature of Notary Public

**OPTIONAL**

*Though the information in this section is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.*

**Description of Attached Document**

Title or Type of Document: \_\_\_\_\_

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

RIGHT THUMBPRINT OF SIGNER #1  
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RIGHT THUMBPRINT OF SIGNER #2  
Top of thumb here

**CERTIFICATE OF SERVICE**

I hereby certify that on November 28, 2011, I caused the foregoing Verified Claim of Christopher Ferguson Pursuant to Rule G(5)(a) of the Supplemental Rules for Admiralty and Maritime Claims to be served by the Court's ECF system upon the following counsel:

Assistant United States Attorney Jason Harris Cowley  
Office of the United States Attorney, S.D.N.Y.  
One St. Andrew's Plaza  
New York, NY 10007

*Attorneys for the Plaintiff United States of America*

/s/ Jonathan Harris  
JONATHAN HARRIS