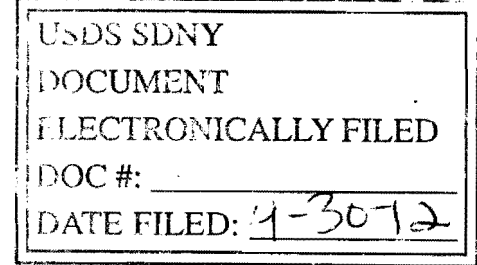


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
-----x  
UNITED STATES OF AMERICA, :  
  
Plaintiff, :  
- v. - :  
  
POKERSTARS, et al,; :  
  
Defendants; :  
  
ALL RIGHT, TITLE AND INTEREST IN :  
THE ASSETS OF POKERSTARS, et al., :  
  
Defendants-in-rem. :  
-----x

STIPULATION AND ORDER IN  
REGARD TO CHAD ELIE

11 Civ. 2564 (LBS)



WHEREAS, on or about April 14, 2011, a verified complaint, 11 Civ. 2564 (LBS) (the "Complaint") was filed under seal in the United States District Court for the Southern District of New York seeking the forfeiture of certain properties (the "Subject Property") pursuant to Title 18, United States Code, Sections 1955(d), 981(a)(1)(A), and 981(a)(1)(C), and seeking civil money laundering penalties pursuant to Title 18, United States Code, Section 1956 against PokerStars and others;

WHEREAS, on or about June 15, 2011, claimant Chad Elie filed a verified claim asserting an ownership/possessory interest in certain of the Subject Property, including the following (collectively, the "Claimed Property"):

1. 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;

2. account numbered 121015390 held at Sunfirst Bank, St. George, Utah, in the name of Triple Seven LP d/b/a A WEB DEBIT, and all funds traceable thereto;
3. account numbered 27351910081015 held at Societé Generale Cyprus LTD, Cyprus, in the name of Golden Shores Properties Limited, and all funds traceable thereto;
4. account numbered CY1211501001065983USDCACC002 held at FBME Bank LTD, Cyprus, in the name of Triple Seven Inc., and all funds traceable thereto;
5. account numbered 5510045221 held at Wells Fargo, N.A., in the name of Triple Seven L.P., and all funds traceable thereto;
6. account numbered 7478010312 held at Wells Fargo, N.A., in the name of Kombi Capital, and all funds traceable thereto;
7. 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;
8. account numbered 129000576 on deposit at Sunfirst Bank, St. George, Utah, formerly in the name of Sunfirst Bank ITF Mastery Merchant/Psars, now in the name of Sunfirst Bank, and all funds traceable thereto;
9. account numbered 200003291 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto;
10. account numbered 200003317 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto;
11. account numbered 200003325 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto;
12. Account numbered 200003309 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto;

13. account number 201002907 at Barclays Bank, UK in the name of Hotwire Financial LLC, and all funds traceable thereto;
14. account number GB26BARC20473563472044 at Barclays Bank, UK, in the name of Hotwire Financial LTD, and all funds traceable thereto;
15. account number 953500105 at Bank One Utah, in the name of 4 A Consulting, and all funds traceable thereto;
16. account numbered 32433 at New City Bank in the name of 21Debit LLC dba PS Payments, and all funds traceable thereto;
17. account numbered 32441 at New City Bank in the name of 21Debit LLC dba FLT Payments, and all funds traceable thereto;
18. account number 32506 at New City Bank in the name of 21Debit LLC, and all funds traceable thereto;
19. \$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;
20. \$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;
21. \$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; and
22. \$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;

WHEREAS, on or about September 21, 2011, a verified amended complaint in this action (the "Amended Complaint") was filed seeking the forfeiture of the Subject Property and seeking

civil money laundering penalties pursuant to Title 18, United States Code, Section 1956 against PokerStars and others; and

WHEREAS, claimant Chad Elie has agreed to withdraw his claim to the Claimed Property;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the United States of America, by its attorney Preet Bharara, United States Attorney for the Southern District of New York, Jason H. Cowley, Assistant United States Attorney, of counsel, and Chad Elie, by his attorneys, Barry H. Berke, Esq., and Dani R. James, Esq., that:

1. Chad Elie hereby withdraws his claim asserting an interest in the Claimed Property. Upon the Court's endorsement of this Stipulation and Order, said claim is hereby deemed dismissed with prejudice, without costs and/or attorney's fees to either party.

2. Chad Elie hereby relinquishes any claim under the U.S. asset forfeiture laws that he has or may have, on any legal, factual or other basis, in any manner or forum (including but not limited to a petition for remission or mitigation), to the Subject Property (including the Claimed Property), and all property traceable to such property, and agrees that he will not object to the entry of any Order of Forfeiture concerning any Subject Property in this matter or otherwise contest the administrative or judicial forfeiture of such property under the

U.S. forfeiture laws or assist a third party in doing so.

3. Chad Elie will take all necessary steps to pass clear title to the Claimed Property to the United States, its agent or designee, including, but not limited to, the execution of all documentation necessary to effect the forfeiture or transfer of the Claimed Property as may be directed by the United States, its agent or designee.

4. Chad Elie understands and agrees that this Stipulation and Order constitutes a full and final settlement of his claim and that he waives any rights to litigate further his interest in the Subject Property (including the Claimed Property), and to petition for remission or mitigation of the forfeiture.

6. The signature pages of this Stipulation and Order may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument. Signature pages may be by fax and such signatures shall be deemed as valid originals.

AGREED AND CONSENTED TO:

PREET BHARARA  
United States Attorney  
Southern District of New York


By:

\_\_\_\_\_  
Jason H. Cowley  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, New York 10007  
(212) 637-2479

\_\_\_\_\_  
DATE

CHAD ELIE

\_\_\_\_\_  
Chad Elie

By:   
\_\_\_\_\_  
Barry H. Berke, Esq.  
Dani R. James, Esq.  
Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas  
New York, NY 10036  
Counsel for Chad Elie

\_\_\_\_\_  
DATE

*4.23.12*

\_\_\_\_\_  
DATE

SO ORDERED:

\_\_\_\_\_  
HONORABLE LEONARD B. SAND  
UNITED STATES DISTRICT JUDGE

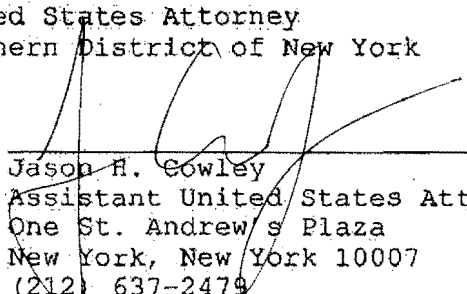
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AGREED AND CONSENTED TO:


PREET BHARARA  
United States Attorney  
Southern District of New York

By:

  
\_\_\_\_\_  
Jason H. Cowley  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, New York 10007  
(212) 637-2479

4/26/12  
DATE

CHAD ELIE

  
\_\_\_\_\_  
Chad Elie

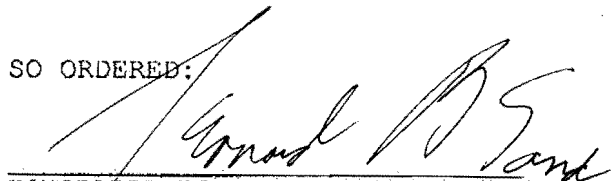
4-23-2012  
DATE

By:

\_\_\_\_\_  
Barry H. Berke, Esq.  
Dani R. James, Esq.  
Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas  
New York, NY 10036  
Counsel for Chad Elie

\_\_\_\_\_  
DATE

SO ORDERED:

  
\_\_\_\_\_  
HONORABLE LEONARD B. SAND  
UNITED STATES DISTRICT JUDGE

4/30/2012  
DATE