UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
POKERSTARS, ET AL.,	)	Civil Action No. 1:11-cv-02564-LBS
	)	
Defendants,	)	
	)	
ALL RIGHTS, TITLE & INTEREST	)	
IN THE ASSETS OF POKERSTARS,	)	
ETC.,	)	
	)	
Defendants-In-Rem.	)	

**VERIFIED CLAIM AND STATEMENT OF INTEREST OR RIGHT
IN PROPERTY SUBJECT TO FORFEITURE IN REM**

TO: UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK

The Commonwealth of Kentucky, *ex rel.*, J. Michael Brown, Secretary Justice and Public

Safety Cabinet (the "Commonwealth"), hereby claims the following defendant property:

(1)   All right, title and interest in the following internet domain names:

pokerstars.com; fulltiltpoker.com; absolutepoker.com; and ultimatebet.com.

(2)   The proceeds from any sale or disposition of said domain names.

In support of its claim, the Commonwealth avers that it was at the time of the filing of the

complaint, and still is, the true and bona fide sole owner of the property and entitled to

possession, and that no other person is the owner of or entitled to possession of the property.

The Commonwealth states that is the owner of the domain names by virtue of its prior seizure of

said domain names, in that certain *in rem* civil forfeiture action, styled *Commonwealth of*

Kentucky, ex rel. J. Michael Brown, Secretary Justice and Public Safety Cabinet v. 141 Internet
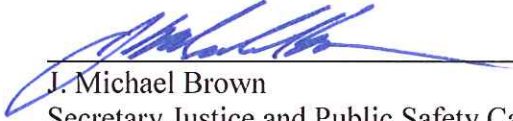
Domain Names, 08-CI-1409 (Franklin Circuit Court, Commonwealth of Kentucky) (hereinafter "Kentucky Forfeiture Action:). Copies of the Second Amended Complaint, the Order of Seizure and the Court's Findings Of Fact And Conclusions Of Law in that action are attached hereto as Exhibits A, B and C.

The Commonwealth seized the domains by reason of its having been victimized, both in its capacity as a sovereign state and in its *parens patriae* capacity with statutory authority on behalf of its citizens, by Defendants' actions, including those actions as pleaded in the Amended Complaint filed herein by the United States, and as pleaded in the Kentucky Forfeiture Action.

WHEREFORE, the Commonwealth of Kentucky *ex rel.*, J. Michael Brown, Secretary Justice and Public Safety Cabinet, respectfully requests the following relief:

1.   Reinstatement of its rightful interest in the aforesaid defendant property;

2.   That it be allowed to defend the instant forfeiture action;

3.   That the domain names be ordered restored and released to the Commonwealth; and

4.   That the Commonwealth be awarded such other and further relief as the Court may deem just.

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On this 30th day of September, 2011, J. Michael Brown deposes and states that he is

Secretary of the Justice and Public Safety Cabinet of the Commonwealth of Kentucky; that he

has the authority, under the laws of the Commonwealth of Kentucky and at the direction of its

Governor, to act on behalf of the Commonwealth in this matter and that he signs this Claim

pursuant to said authority; that he had read said Claim and knows the contents thereof, and he

further declares that the statements herein are true and correct under penalty of perjury.

_____
J. Michael Brown
Secretary Justice and Public Safety Cabinet

Commonwealth of Kentucky)
)
County of Franklin   )

    The foregoing Affidavit, was acknowledged, subscribed to and sworn to before me by J.
Michael Brown, this 30th day of _Septtember_____, 2011.

    My Commission Expires: _10/25/11_____

_____
Notary Public

                    Respectfully submitted,

                    /s/ D. Eric Lycan (*pro hac vice*)
                    STEPTOE & JOHNSON, PLLC
                    1010 Monarch Street, Suite 250
                    P.O. Box 910810
                    Lexington, Kentucky 40513
                    Telephone: (859) 255-7080
                    Facsimile: (859) 255-6903
                    eric.lycan@steptoe-johnson.com

                    Attorney for Commonwealth of Kentucky ex rel., J.
                    Michael Brown, Secretary Justice and Public Safety
                    Cabinet

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CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2011, I electronically filed the foregoing with the

Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to

all counsel of record, and by United States Mail, first class postage prepaid, to the following:

Steven J. McChool
Mallon & McChool, LLC
1776 K Street, N.W., Suite 200
Washington, D.C. 20006
Attorneys for Chad Elie

/s/ D. Eric Lycan
ATTORNEY FOR DEFENDANT

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