

Sundt

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

11 Civ. 2564 (LBS)

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10-4-11

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 pursuant to Title 18, United States Code, Sections 1955(d), 981(a)(1)(A), and 981(a)(1)(C), including, but not limited to, the following:

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;

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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;

(collectively, the "Subject Property") 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 the Subject Property.

WHEREAS, on or about September 21, 2011, a verified

amended complaint in this action (the "Amended Complaint") was filed seeking the forfeiture of, among others, the Subject Property, and seeking civil money laundering penalties pursuant to Title 18, United States Code, Section 1956 against PokerStars and others;

WHEREAS, Chad Elie has requested additional time to answer the Amended Complaint;

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 attorney, William R. Cowden, Esq. of Mallon & McCool, LLC, that:

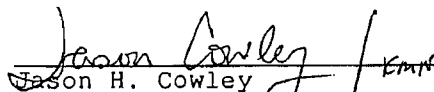
1. Chad Elie shall have until October 31, 2011, to answer or otherwise respond to the Amended Complaint.

2. 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~~ Esq.
Assistant United States Attorney
One St. Andrew's Plaza
New York, New York 10007
(212) 637-2479

9/29/2011
DATE

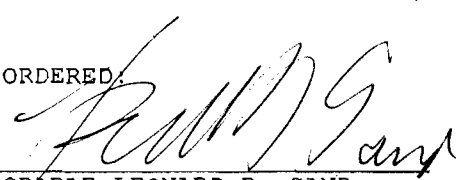
CHAD ELIE

By:


William R. Cowden, Esq.
Mallon & McCool, LLC
1776 K Street, N.W., Suite 200
Washington, DC 20006
(202) 642-0209
Counsel for Chad Elie

9-29-2011
DATE

SO ORDERED


HONORABLE LEONARD B. SAND
UNITED STATES DISTRICT JUDGE

10/3/11
DATE