

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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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. :

:  
: 11 Civ. 2564 (LBS)  
:  
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:  
: **VERIFIED CLAIM OF AVOINE -**  
: **SERVICO DE CONSULTADORIA**  
: **E MARKETING, LDA**  
:  
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PLEASE TAKE NOTICE that AVOINE – SERVICO DE CONSULTADORIA E MARKETING, LDA (“Avoine” or “Claimant”), pursuant to 18 U.S.C. § 983(a)(4) and Rule G(5)(a), Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, by and through its attorneys, hereby asserts ownership in, and makes claim upon, all right, title and interest in the assets of Claimant that have been restrained, seized or referenced in the Verified First Amended Complaint (“Amended Complaint”) in the above-captioned case, including, but not limited to, the following:

1 Absolute poker.com and any other domain names that include the word “absolute poker” or any variation thereof (the “Domain Names”) and

2 All property and other assets assigned to Avoine by SGS (BVI) Inc. (“SGS”) in or about 2007, including without limitation: (a) all tangible and intangible property, including computer hardware and software, developed and/or used in the operation of the AbsolutePoker online poker business as of the date of such assignment (the “AP Intellectual Property”); and (b) stock and/or other equity interests in (i) Fiducia Exchange Ltd.; (ii) Momentum Technologies, Inc.; and (iii) Panora Tech Belize Inc. (the “Subsidiaries”).

Pursuant to Rule E(8) of the Supplemental Rules for Admiralty or Maritime Claims, Claimant's appearance is expressly restricted to the defense of the plaintiff's in rem forfeiture action respecting the above-referenced property, and the Verified Claim does not constitute an appearance for any other purpose, nor does it confer jurisdiction over Claimant.

Claimant asserts right, title and interest in the Domain Names, the AP Intellectual Property, and the Subsidiaries based on legal and equitable ownership, which was, upon information and belief, acquired by assignment from the developer and previous owner of such property, SGS.

Claimant reserves the right to amend or supplement this claim after learning of new information, including information related to additional assets that are subject to forfeiture.

Dated: New York, New York  
January 5, 2012

**TRACHTENBERG RODES & FRIEDBERG LLP**  
Attorneys for Claimant

By: 

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**VERIFICATION**

I, **THOMAS STEEN BRANDI**, as chairman of the board of directors of Avoine – Servico de Consultadoria e Marketing, LDA, hereby declare under penalty of perjury, pursuant to 28 U.S.C. 1746, that the foregoing CLAIM OF AVOINE - SERVICO DE CONSULTADORIA E MARKETING, LDA is true to the best of my knowledge, information and belief.

Dated: Oslo, Norway  
January 5, 2012



Thomas Steen Brandi