

**COMMONWEALTH OF KENTUCKY
FRANKLIN CIRCUIT COURT
DIVISION II
CIVIL ACTION NO. 08-CI-1409**

COMMONWEALTH OF KENTUCKY
ex rel. J. Michael Brown, Secretary,
JUSTICE AND PUBLIC SAFETY CABINET

PLAINTIFFS

v.

NOTICE OF FILING

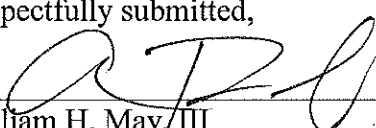
140 INTERNET DOMAIN NAMES

DEFENDANTS

* * * * *

Comes the Plaintiff, Commonwealth of Kentucky *ex rel.* J. Michael Brown, Secretary, Justice and Public Safety Cabinet (“Commonwealth”), by and through counsel, for its notice of filing states that pursuant to the letter from GODADDY.COM dated September 25, 2008 and attached as Exhibit A, the Commonwealth is filing the Registrar Certificates for bet21.com, slotsplus.com, vicsbingo.com, 123bingo.com, bingoknights.com, bingoworkz.com, bonuslevelslots.com, cakepoker.com, desperatethehousewivesbingo.com, doylesroom.com, magicislandcasino.com, riopartycasino.com, rushmorecasino.com, slotsoffortune.com, ultimatebet.com, usabingo.com, viploungecasino.com, casinobar.com attached as Exhibit B.

Respectfully submitted,



 William H. May, III
 D. Eric Lycan
 William C. Hurt, Jr.
 Aaron D. Reedy
 HURT, CROSBIE & MAY, PLLC
 127 W. Main Street
 Lexington, Kentucky 40507
 Telephone: (859) 254-0000
 Fax: (859) 254-4763
 COUNSEL FOR THE COMMONWEALTH

CERTIFICATE OF SERVICE

I hereby certify that a true copy of this Motion was served, this the 6th day of October, 2008 by U.S. Mail and email to the following:

Hon. Ian T. Ramsey
Hon. Joel T. Beres
Stites & Harbison, PLLC
400 West Market Street
Suite 1800
Louisville, KY 40202-3352
Telephone: (502) 587-3400
Fax: (502) 587-6391

Hon. Bruce F. Clark
Stites & Harbison, PLLC
421 West Main Street
Frankfort, KY 40601
Telephone: (502) 223-3477

And

Hon. A. Jeff Ifrah
Hon. Jerry Stouck
Greenberg Traurig, LLP
Suite 1000
2101 L. Street, N.W.
Washington, D.C. 20037
Telephone: (202) 331-3100
COUNSEL FOR INTERACTIVE GAMING COUNCIL

Hon. Jon L. Fleischaker
Hon. R. Kenyon Meyer
Hon. James L. Adams
Dinsmore & Shohl, LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
Telephone: (502) 540-2300
Facsimile: (502) 585-2207

And

Hon. Edward James Leyden
Hollrah Leyden, LLC
1850 K Street, N.W.

International Square, Suite 390
Washington, D.C. 20006
COUNSEL FOR INTERACTIVE MEDIA ENTERTAINMENT & GAMING
ASSOCIATION, INC.

Hon. William E. Johnson
Johnson, True & Guarnieri, LLP
326 West Main Street
Frankfort, KY 40601
Telephone: (502) 875-6000
Facsimile: (502) 857-6008

And

Hon. Patrick T. O'Brien
Greenberg Traurig
401 East Las Olas Boulevard
Suite 2000
Fort Lauderdale, FL 33301
Telephone: (954) 768-8221
Fax: (954) 765-1477
COUNSEL FOR 7 DOMAIN DEFENDANTS

Hon. P. Douglas Barr
Hon. Palmer G. Vance II
Hon. Alison Lundergan Grimes
Stoll Kennon Ogden
300 West Vine Street
Suite 2100
Lexington, KY 40507-1801
Telephone: 859.231.3000
Facsimile: 859.253.1093

And

Hon. Lawrence G. Walters
Weston, Garrou, Walters & Mooner
781 Douglas Avenue
Altamonte Springs, Florida 32714
Telephone: (407) 975-9150
COUNSEL FOR 2 DOMAIN DEFENDANT REGISTRANTS

Hon. Charles M. Pritchett
Hon. Joshua T. Rose
Frost Brown Todd LLC
400 West Market Street, 32nd Floor

Louisville, Kentucky 40202-3363

Telephone: 502.568.0399

Fax: 502.581.1087

COUNSEL FOR THE POKERS PLAYERS ALLIANCE



COUNSEL FOR THE COMMONWEALTH



Writer's Direct Line
480-366-3009
landerson@godaddy.com

September 25, 2008

William H. May, III
D. Eric Lycan
William C. Hurt, Jr.
Hurt, Crosbie & May, PLLC
127 W. Main Street
Lexington, Kentucky.
40507

Re: Civil Action No.: 08-CI-1409

Dear Sirs:

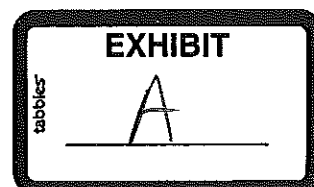
In lieu of implementing the order we are submitting a Registrar Certificate. We understand there is a hearing on September 26th that will provide the registrants an opportunity to come forward and claim the seized property. Therefore, we are providing the court with a Registrar Certificate which will place the domain names under the dominion and control of the Court. An original Registrar Certificate is enclosed for filing with the court.

If we can assist further, please give me a call.

Very truly yours,

GODADDY.COM

Laurie Anderson
Laurie Anderson
Disputes Manager



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

COMMONWEALTH OF KENTUCKY
FRANKLIN CIRCUIT COURT
DIVISION II
CIVIL ACTION NO: 08-CI-1409

COMMONWEALTH OF KENTUCKY
Ex rel. J. Michael Brown, Secretary
Justice and Public Safety Cabinet

Plaintiff

vs.

141 INTERNET DOMAIN NAMES.

Defendants.

I, Laurie Anderson, a representative of GoDaddy.com, Inc., registrar of Internet domain names under the top level domains .com, .org. and .net, among others, hereby declare:

1. I have personal knowledge of the facts stated herein, and would testify to such facts if so called to testify.

2. GoDaddy.com, Inc. is the registrar of the domain names at issue in this case:

- USABINGO.COM
- SLOTSOFFORTUNE.COM
- ULTIMATEBET.COM
- CASINOBAR.COM
- DOYLESROOM.COM
- RUSHMORECASINO.COM
- 123BINGO.COM



1 BINGOWORKZ.COM
2 VIPLOUNGECASINO.COM
3 DESPERATEHOUSEWIVESBINGO.COM
4 RIOPARTYCASINO.COM
5 SLOTSPLUS.COM
6 REEFERPOKER.COM
7 VICSBINGO.COM
8 CAKEPOKER.COM
9 BET21.COM
10 BINGOKNIGHTS.COM

11
12 3. On September 19, 2008, GoDaddy.com, Inc. received written notification of a
13 filed, stamped copy of the Order Of Seizure of Domain Names in the instant case.
14

15 4. The Order states that there is probable cause to believe that certain Domain
16 Names are being used in connection with illegal gambling activity within the Commonwealth
17 of Kentucky and orders the names to be seized.

18 5. Per the Order issued by this Court, GoDaddy.com, Inc. placed the Domain
19 Names on registrar lock, thus preventing the Domain Names from being transferred, modified
20 or otherwise managed or manipulated.
21

22 6. Furthermore, GoDaddy.com, Inc. will not modify the status of the Domain
23 Names unless and until instructed to do so by Order of the court in the instant case.
24
25
26

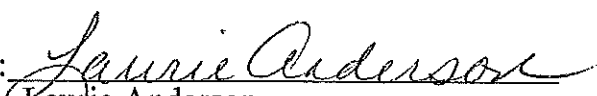
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

7. Therefore, the Domain Names should be construed to be under the dominion and control of the Court until such time as GoDaddy.com, Inc. receives further instruction with regard to the Domain Names.

8. I declare that the foregoing is true and correct.

DATED this 25th day of September, 2008.

GODADDY.COM, INC.

By: 
Laurie Anderson
Disputes Manager
Domain Services
Godaddy.com, Inc.