



U.S. Department of Justice

United States Attorney
Southern District of New York

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The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 15, 2011

By Hand Delivery

Honorable Robert W. Sweet
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

UNDER SEAL

Re: *United States v. Pokerstars, et. al.*, 11 Civ. 2564
(LBS) (sealed)

Dear Judge Sweet,

On April 14, 2011, the Government initiated the above-captioned *in rem* forfeiture and money laundering penalty action by filing a verified complaint (the "Complaint" or "Compl.") under seal against certain corporate entities as defendants and certain assets and properties as defendants *in rem*. The above-captioned action relates factually to a sealed Indictment, *United States v. Scheinberg, et. al.*, S3 10 Cr. 336 (LAK) (the "Indictment").

Today, April 15, 2011, the Government anticipates the arrest of two defendants charged in the Indictment, and once today's arrests are executed, the Government will no longer need the Complaint or the identities of the parties in the above-captioned case to remain under seal. This is also true of the affidavits attached to the Complaint as exhibits and incorporated therein that had been previously placed under seal. These affidavits were submitted in connection with the following seizure warrants:

(a) *United States v. All funds on deposit at City National Bank in account number 370117950, held in the name of G.I. Holdings, and all property traceable thereto, et al.*, 09 Mag. 1932;

(b) *United States v. All funds on deposit, up to and including \$231,000, at First Republic Bank in account number 80000373283, held in the name of G.I. Holdings, and all funds traceable thereto*, 09 Mag. 1974;

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(c) *United States v.* All funds on deposit at Fifth Third Bank in account number 7431859508, held in the name of Viable Marketing Corp., and all property traceable thereto, et al., 09 Mag. 2382;

(d) *United States v.* All funds on deposit at National Bank of California in account number 2547716 held in the name of Viable Processing Solutions, and all property traceable thereto, et al., 10 Mag. 354;

(e) *United States v.* All funds on deposit at Four Oaks Bank and Trust Company, Four Oaks North Carolina, in account number 520055501, held in the name of LST Financial, and all property traceable thereto, et al., 10 Mag. 1562; and

(f) *United States v.* \$6,152,285.88 in United States currency on deposit at First Bank of Delaware, Philadelphia, Pennsylvania, in account numbered 9016139, et al., 10 Mag. 2701.

We refer to these affidavits, along with the Complaint in the above-captioned matter (including the identity of the parties) collectively as the "Sealed Materials."

Accordingly, the Government respectfully requests permission to disclose and make public the Sealed Materials immediately following the execution of one or more arrest warrants in the *Scheinberg* matter without further order from the Court. As soon as practicable thereafter, the Government will present this letter, if endorsed by the Court, to the appropriate Court personnel so that the Sealed Materials maintained in official Court files can be unsealed.

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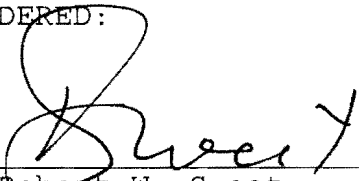
Respectfully submitted,

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SO ORDERED:


Hon. Robert W. Sweet
United States District Judge
Southern District of New York
Part I

Dated: 4.15.11