

Exhibit D

09 MAG 1974

PREET BHARARA
United States Attorney for the
Southern District of New York

By: MICHAEL D. LOCKARD
Assistant United States Attorney
(212) 637-2193

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
UNITED STATES OF AMERICA :

- v. - :

ALL FUNDS ON DEPOSIT, UP TO AND
INCLUDING \$231,000, ON DEPOSIT AT
FIRST REPUBLIC BANK IN ACCOUNT
NUMBER 80000373283, HELD IN THE
NAME OF G.I. HOLDINGS, AND ALL
FUNDS TRACEABLE THERETO,

SEALED AFFIDAVIT
IN SUPPORT OF A SEIZURE
WARRANT PURSUANT TO
18 U.S.C. §§ 981, 984 &
1955

Defendant-in-rem.

----- x

STATE OF NEW YORK)
COUNTY OF NEW YORK) ss:
SOUTHERN DISTRICT OF NEW YORK)

DANA CONTE, being duly sworn, deposes and says:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed for approximately five years. I am assigned to a squad that investigates financial crimes, which includes financial institution fraud and money laundering. I am familiar with the facts and circumstances set forth below from my personal participation in the investigation, my review of bank records and other documents, and my conversations with civilian witnesses and other law enforcement officers. Where the actions, statements, and conversations of

others are recounted herein, they are recounted in substance and in part, unless otherwise indicated. Because this affidavit is for the limited purpose of establishing probable cause for a seizure warrant, it does not set forth every fact learned in the course of this investigation.

2. This affidavit is submitted in support of the Government's application for the issuance of a warrant to seize and forfeit ALL FUNDS ON DEPOSIT, UP TO AND INCLUDING \$231,000, ON DEPOSIT AT FIRST REPUBLIC BANK IN ACCOUNT NUMBER 80000373283, HELD IN THE NAME OF G.I. HOLDINGS, AND ALL FUNDS TRACEABLE THERETO (the "Defendant Funds").

3. As set forth below, there is probable cause to believe that the Defendant Funds are property involved in actual or attempted money laundering transactions, or property traceable to such property, in violation of 18 U.S.C. § 1956(a). As such, the Defendant Funds are subject to forfeiture to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(A) and 984.

4. In addition, there is probable cause to believe that the Defendant Funds are property that constitutes or is derived from proceeds traceable to the operation of an illegal gambling business, in violation of 18 U.S.C. § 1955, and the illegal transmission of gambling information, in violation of 18 U.S.C. § 1084, and property used in the operation of an illegal gambling business and commission of the gambling offense. As

such, the Defendant Funds are subject to forfeiture to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C), 984, and 1955(d).

THE RELATED SEIZURE WARRANTS

5. The instant application stems from an FBI investigation into illegal internet gambling businesses. That investigation revealed that a number of bank accounts at different banks in the name of G.I. Holdings contained funds constituting or traceable to property involved in actual or attempted money laundering, and property used in the operation of an illegal gambling business.

6. On or about August 25, 2009, United States Magistrate Judge Ronald L. Ellis issued seizure warrants, 09 Mag. 1932, for all funds on deposit at (1) City National Bank in account number 370117950, held in the name G.I. Holdings (the "City National G.I. Holdings Account"); (2) Wells Fargo Bank in account number 5383346862, held in the name G.I. Holdings (the "Wells Fargo G.I. Holdings Account"); (3) Citibank, N.A., in account numbers 203023239 and 203118542, held in the name G.I. Holdings (the "Citibank G.I. Holdings Accounts"); (4) Service 1st Bank of Nevada in account number 2020003792, held in the name G.I. Holdings (the "Service 1st G.I. Holdings Account"); and (5) Nevada Commerce Bank in account numbers 0021002712 and 0021002795, held in the name G.I. Holdings (the "Nevada Commerce G.I. Holdings Accounts" and, together with the City National G.I.

Holdings Account, the Wells Fargo G.I. Holdings Account, the Citibank G.I. Holdings Accounts, and the Service 1st G.I. Holdings Account, the "Seized Accounts"); and all funds traceable thereto. A copy of the affidavit of FBI Special Agent Rebecca E. Vassilakos in support of the issuance of these seizure warrants is annexed hereto as Exhibit 1, and copies of the Seizure Warrants are annexed hereto as Exhibit 2.

7. The facts sufficient to show probable cause to believe that the Seized Accounts contained property constituting or traceable to property involved in actual or attempted money laundering and property used in ^{the} operation of an illegal gambling business are set forth in ~~my~~ ^{Agent Vassilakos's} prior affidavit, which is incorporated by reference herein. In sum and substance, in approximately June of 2009, G.I. Holdings began processing large volumes of deposits for "GREEN2YOURGREEN" through a number of bank accounts opened with different financial institutions in the Las Vegas area. In June and July 2009, G.I. Holdings was depositing hundreds of thousands of checks that G.I. Holdings printed, with G.I. Holdings as the payee and individuals as the payors. These checks generally were in the range of approximately \$15 to \$600, and generally were processed in ^{the} batches of thousands of checks. The various G.I. Holdings ^{accounts} typically suffered from high chargeback rates as thousands or tens of thousands of payors disputed the payments. These

hundreds of thousands of pre-printed checks deposited into the G.I. Holdings accounts had "GREEN2YOURGREEN" in their memo lines; sometimes "GREEN2YOURGREEN" appeared by itself, but more often it appeared with a phone number and with the symbol "PS," "FT," or "UB." Later, some of the Green2YourGreen checks replaced the codes "PS," "FT," and "UB" with "1" (or "one"), "2" (or "two") and "3" (or "three"). G.I. Holdings typically represented to the banks where it opened accounts that it was a payment processing company for various clients and that Green2YourGreen was a "multi-tiered" marketing firm that sold green or eco-friendly products. Based on my investigation, however, I believe that "PS," "FT," and "UB" stand, respectively, for "PokerStars," "FullTilt Poker," and "Ultimate Bet," three of the largest online gambling operations in the world. Moreover, as described in my prior affidavit, a cooperating witness in the Southern District of New York made deposits into the cooperating witness's online gambling accounts at FullTilt Poker and PokerStars in approximately June and July 2009, and shortly thereafter preprinted checks to G.I. Holdings in the amounts of the online deposits posted to the cooperating witness's bank account. These checks had "GREEN2YOURGREEN" notations in their memo lines, and were deposited by G.I. Holdings into the City National G.I. Holdings Account, the Wells Fargo G.I. Holdings Account, and one of the Citibank G.I. Holdings Accounts.

THE DEFENDANT FUNDS ARE TRACEABLE
TO TWO OF THE SEIZED ACCOUNTS

8. The Defendant Funds are traceable to two of the Seized Accounts and, accordingly, are traceable to the money laundering and gambling operations described in my prior affidavit. I have spoken with Agent Vassilakos about her discussions with a representative of First Republic Bank and, from that discussion, I learned in substance and in part that the G.I. Holdings account numbered 80000373283 at First Republic was opened on or about August 10, 2009, with a \$1,000 check drawn on one of the Citibank G.I. Holdings Accounts, account number 203023239. On or about August 17, 2009, \$230,000 was transferred into the First Republic Bank G.I. Holdings Account from one of the Nevada Commerce G.I. Holdings Accounts, account number 21002712. As of August 28, 2009, the First Republic account had a balance of \$287,917.38. First Republic Bank is in the process of closing out the account.

STATUTORY AUTHORITY

9. The statutory provisions pursuant to which the Defendant Funds are subject to seizure and forfeiture are described below.

10. Title 18, United States Code, Section 981(a)(1)(A) subjects to forfeiture "[a]ny property, real or personal, involved in a transaction or attempted transaction in violation

of . . . section 1956 . . . of this title, or any property traceable to such property."

11. Title 18, United States Code, Section 1956 provides, in pertinent part, that

(a)(1) Whoever, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of specified unlawful activity--

(A)(i) with the intent to promote the carrying on of specified unlawful activity; . . . or

(B) knowing that the transaction is designed in whole or in part-- (i) to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity . . .

shall be guilty of a crime.

12. Title 18, United States Code, Section 1956(c)(7)(A) provides that the term "specified unlawful activity" includes "any act or activity constituting an offense listed in section 1961(1) of this title". Included among the enumerated offenses in 18 U.S.C. § 1961(1) is 18 U.S.C. § 1955, which prohibits the operating of illegal gambling businesses; 18 U.S.C. § 1084; and racketeering activity, which includes any act or threat involving gambling, which is chargeable under State law and punishable by imprisonment for more than one year.

13. Furthermore, 18 U.S.C. § 981(a)(1)(C)

subjects to forfeiture:

Any property, real or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting 'specific unlawful activity' (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

14. Again, as noted in paragraph 12, supra, 18 U.S.C. § 1956(c)(7)(A) provides that the term "specified unlawful activity" includes "any act or activity constituting an offense listed in section 1961(1) of this title," and § 1961(1) includes 18 U.S.C. §§ 1955 and 1084 among the enumerated offenses.

15. In addition, 18 U.S.C. § 1955 has its own forfeiture provision. Specifically, § 1955(d) provides that "[a]ny property, including money, used in violation of the provisions of this section may be seized and forfeited to the United States."

16. Furthermore, 18 U.S.C. § 984 provides, in relevant part, that:

- (a) (1) In any forfeiture action in rem in which the subject property is . . . funds deposited in an account in a financial institution . . .
 - (A) it shall not be necessary for the Government to identify the specific property involved in the offense that is the basis for the forfeiture; and
 - (B) it shall not be a defense that the property involved in such an offense has been removed and replaced by identical property.

(2) Except as provided in subsection (b), any identical property found in the same place or account as the property involved in the offense that is the basis for the forfeiture shall be subject to forfeiture under this section.

- (b) No action pursuant to this section to forfeit property not traceable directly to the offense that is the basis for the forfeiture may be commenced more than 1 year from the date of the offense.

17. Section 981(b)(1) of Title 18, United States Code, provides that any property subject to forfeiture to the United States under 18 U.S.C. § 981(a) may be seized by the Attorney General. Section 981(b)(2) provides that such a seizure may be made "pursuant to a warrant obtained in the same manner as provided for a search warrant under the Federal Rules of Criminal Procedure."

18. In addition, Section 981(b)(3) provides that, notwithstanding the provisions of Federal Rule of Criminal Procedure 41(a), a seizure warrant may be issued pursuant to Section 981(b) by a judicial officer in any district in which a forfeiture action against the property may be filed under Title 28, United States Code, Section 1355(b). Under Section 1355(b)(1)(A), a forfeiture action or proceeding may be brought in the district in which any of the acts or omissions giving rise to the forfeiture occurred.

19. Were this affidavit to be made public at this time, it would interfere with an ongoing criminal investigation into certain individuals engaged in the criminal business of online gambling and money laundering. Making the affidavit public also would interfere with the ability of law enforcement officers to locate and seize the proceeds of criminal online gambling businesses.

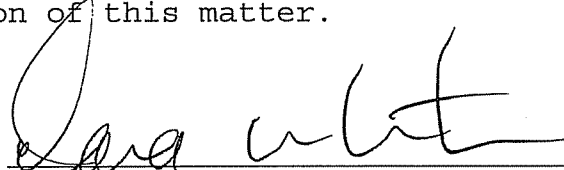
20. Should the court issue a seizure warrant on the basis of this affidavit, making that warrant publicly available before it is executed could interfere with the ability of law enforcement officers to seize the Defendant Funds before they are dissipated.

CONCLUSION

21. For the foregoing reasons, I submit that there is probable cause to believe that the Defendant Funds are traceable to (a) monies involved in a money laundering transaction or attempted money laundering transaction, in violation of 18 U.S.C. § 1956(a)(2)(A); and (b) the proceeds of illegal internet gambling and property involved in illegal internet gambling, in violation of 18 U.S.C. § 1955. Accordingly, the Funds are subject to forfeiture to the United States of America pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C) and 1955, and I respectfully request that the Court issue a seizure warrant for the Defendant Funds, as described in paragraph 2, supra.

22. I also respectfully request that this Affidavit be sealed until further order of the Court and any warrant issued based on this Affidavit be sealed until it is executed, so as not to jeopardize the investigation of this matter.

AUG 31 2009




Dana Conte, Special Agent
Federal Bureau of Investigation

Sworn to before me this
day of August, 2009:

HONORABLE MICHAEL H. DOLINGER
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

This Affidavit must remain under seal until further Order of the Court and the accompanying Seizure Warrant must remain under seal until it is executed.

SO ORDERED



HONORABLE MICHAEL H. DOLINGER
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

OMITTED

Exhibit 2

09 MAG 1932

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
UNITED STATES OF AMERICA :

- 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, :

Defendant-in-rem. :
- - - - - X

WARRANT OF SEIZURE
IN REM PURSUANT TO
18 U.S.C. §§ 981, 984 &
1955

WARRANT OF SEIZURE

TO: ANY SPECIAL AGENT OF THE FEDERAL BUREAU OF INVESTIGATION OR
ANY OTHER LAW ENFORCEMENT OFFICER AUTHORIZED BY LAW

An Affidavit having been made before me by Rebecca E. Vassilakos, a Special Agent of the Federal Bureau of Investigation ("FBI"), that she has reason to believe that the funds specified in the above-captioned bank account are subject to seizure and civil forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C), 981(b), 984, and 1955, and as I am satisfied that there is probable cause to believe that the property so described is subject to seizure and civil forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C), 981(b), 984, and 1955,

YOU ARE HEREBY COMMANDED AND AUTHORIZED to seize, within ten (10) days of the date of issuance of this warrant, by serving a copy of this warrant of seizure, upon the custodian of the bank account, if any, the funds described as follows:

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.

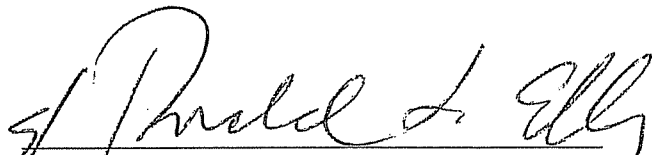
YOU ARE FURTHER COMMANDED AND AUTHORIZED to prepare a written inventory of the property seized and promptly return this warrant and inventory before this Court as required by law.

CITY NATIONAL BANK IS HEREBY COMMANDED to effect the seizure of the contents of the above-referenced accounts and to refuse the withdrawal of any amount from said accounts by anyone other than duly authorized law enforcement agents, promptly to provide law enforcement officers with the current account balance, and continue to accrue any deposits, interest, dividends, and any other amount credited to said account until the aforementioned law enforcement agents direct that the contents of said account be finally liquidated.

Dated: New York, New York

August , 2009

AUG 25 2009



HONORABLE RONALD L. ELLIS
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

09 MAG 1982

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
UNITED STATES OF AMERICA :

- v. -

: WARRANT OF SEIZURE
: IN REM PURSUANT TO
: 18 U.S.C. §§ 981, 984 &
: 1955

ALL FUNDS ON DEPOSIT AT WELLS FARGO :
BANK IN ACCOUNT NUMBER 5383346862, :
HELD IN THE NAME OF G.I. HOLDINGS, :
AND ALL PROPERTY TRACEABLE THERETO, :

Defendant-in-rem.

a)

----- X

WARRANT OF SEIZURE

TO: ANY SPECIAL AGENT OF THE FEDERAL BUREAU OF INVESTIGATION OR
ANY OTHER LAW ENFORCEMENT OFFICER AUTHORIZED BY LAW

An Affidavit having been made before me by Rebecca E. Vassilakos, a Special Agent of the Federal Bureau of Investigation ("FBI"), that she has reason to believe that the funds specified in the above-captioned bank account are subject to seizure and civil forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C), 981(b), 984, and 1955, and as I am satisfied that there is probable cause to believe that the property so described is subject to seizure and civil forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C), 981(b), 984, and 1955,

YOU ARE HEREBY COMMANDED AND AUTHORIZED to seize, within ten (10) days of the date of issuance of this warrant, by serving a copy of this warrant of seizure, upon the custodian of the bank account, if any, the funds described as follows:

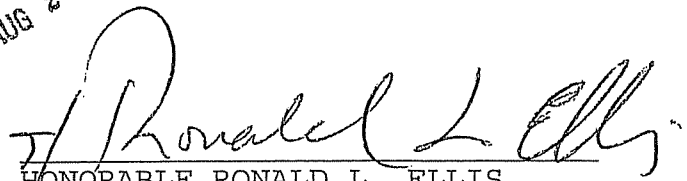
ALL FUNDS ON DEPOSIT AT WELLS FARGO BANK IN ACCOUNT NUMBER 5383346862, HELD IN THE NAME OF G.I. HOLDINGS, AND ALL PROPERTY TRACEABLE THERETO.

YOU ARE FURTHER COMMANDED AND AUTHORIZED to prepare a written inventory of the property seized and promptly return this warrant and inventory before this Court as required by law.

WELLS FARGO BANK IS HEREBY COMMANDED to effect the seizure of the contents of the above-referenced accounts and to refuse the withdrawal of any amount from said accounts by anyone other than duly authorized law enforcement agents, promptly to provide law enforcement officers with the current account balance, and continue to accrue any deposits, interest, dividends, and any other amount credited to said account until the aforementioned law enforcement agents direct that the contents of said account be finally liquidated.

Dated: New York, New York
August __, 2009

AUG 25 2009



HONORABLE RONALD L. ELLIS
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

09 MAG

1982

UNITED STATES OF AMERICA

X
:

- v. -

: WARRANT OF SEIZURE
IN REM PURSUANT TO

ALL FUNDS ON DEPOSIT AT CITIBANK,
N.A., IN ACCOUNT NUMBERS 203023239
AND 203118542, HELD IN THE NAME OF
G.I. HOLDINGS, AND ALL PROPERTY
TRACEABLE THERETO,

: 18 U.S.C. §§ 981, 984 &
1955

Defendant-in-rem.

:

X

B/

WARRANT OF SEIZURE

TO: ANY SPECIAL AGENT OF THE FEDERAL BUREAU OF INVESTIGATION OR
ANY OTHER LAW ENFORCEMENT OFFICER AUTHORIZED BY LAW

An Affidavit having been made before me by Rebecca E. Vassilakos, a Special Agent of the Federal Bureau of Investigation ("FBI"), that she has reason to believe that the funds specified in the above-captioned bank account are subject to seizure and civil forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C), 981(b), 984, and 1955, and as I am satisfied that there is probable cause to believe that the property so described is subject to seizure and civil forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C), 981(b), 984, and 1955,

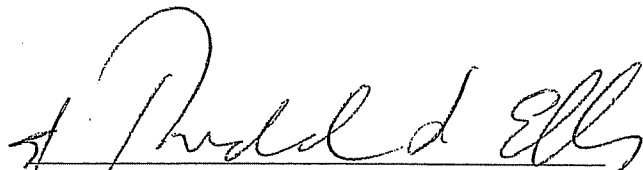
YOU ARE HEREBY COMMANDED AND AUTHORIZED to seize, within ten (10) days of the date of issuance of this warrant, by serving a copy of this warrant of seizure, upon the custodian of the bank account, if any, the funds described as follows:

ALL FUNDS ON DEPOSIT AT CITIBANK, N.A., IN
ACCOUNT NUMBERS 203023239 AND 203118542, HELD
IN THE NAME OF G.I. HOLDINGS, AND ALL
PROPERTY TRACEABLE THERETO.

YOU ARE FURTHER COMMANDED AND AUTHORIZED to prepare a
written inventory of the property seized and promptly return this
warrant and inventory before this Court as required by law.

CITIBANK, N.A. IS HEREBY COMMANDED to effect the
seizure of the contents of the above-referenced accounts and to
refuse the withdrawal of any amount from said accounts by anyone
other than duly authorized law enforcement agents, promptly to
provide law enforcement officers with the current account
balance, and continue to accrue any deposits, interest,
dividends, and any other amount credited to said account until
the aforementioned law enforcement agents direct that the
contents of said account be finally liquidated.

Dated: New York, New York
August 25th 2009


HONORABLE RONALD L. ELLIS
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

09 MAG 1932

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
UNITED STATES OF AMERICA :

- v. -

ALL FUNDS ON DEPOSIT AT SERVICE 1ST :
BANK OF NEVADA IN ACCOUNT NUMBER :
2020003792, HELD IN THE NAME OF :
G.I. HOLDINGS, AND ALL PROPERTY :
TRACEABLE THERETO, :

WARRANT OF SEIZURE
IN REM PURSUANT TO
18 U.S.C. §§ 981, 984 &
1955

Defendant-in-rem. :

9

----- X

WARRANT OF SEIZURE

TO: ANY SPECIAL AGENT OF THE FEDERAL BUREAU OF INVESTIGATION OR
ANY OTHER LAW ENFORCEMENT OFFICER AUTHORIZED BY LAW

An Affidavit having been made before me by Rebecca E. Vassilakos, a Special Agent of the Federal Bureau of Investigation ("FBI"), that she has reason to believe that the funds specified in the above-captioned bank account are subject to seizure and civil forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C), 981(b), 984, and 1955, and as I am satisfied that there is probable cause to believe that the property so described is subject to seizure and civil forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C), 981(b), 984, and 1955,

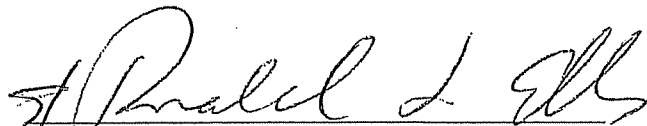
YOU ARE HEREBY COMMANDED AND AUTHORIZED to seize, within ten (10) days of the date of issuance of this warrant, by serving a copy of this warrant of seizure, upon the custodian of the bank account, if any, the funds described as follows:

ALL FUNDS ON DEPOSIT AT SERVICE 1ST BANK OF NEVADA IN ACCOUNT NUMBER 2020003792, HELD IN THE NAME OF G.I. HOLDINGS, AND ALL PROPERTY TRACEABLE THERETO.

YOU ARE FURTHER COMMANDED AND AUTHORIZED to prepare a written inventory of the property seized and promptly return this warrant and inventory before this Court as required by law.

SERVICE 1ST BANK OF NEVADA IS HEREBY COMMANDED to effect the seizure of the contents of the above-referenced accounts and to refuse the withdrawal of any amount from said accounts by anyone other than duly authorized law enforcement agents, promptly to provide law enforcement officers with the current account balance, and continue to accrue any deposits, interest, dividends, and any other amount credited to said account until the aforementioned law enforcement agents direct that the contents of said account be finally liquidated.

Dated: New York, New York
August 25th 2009



HONORABLE RONALD L. ELLIS
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

09 MAG

1982

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
UNITED STATES OF AMERICA :

- v. -

ALL FUNDS ON DEPOSIT AT NEVADA :
COMMERCE BANK IN ACCOUNT NUMBERS :
0021002712 AND 0021002795, HELD IN :
THE NAME OF G.I. HOLDINGS, AND ALL :
PROPERTY TRACEABLE THERETO, :

WARRANT OF SEIZURE
IN REM PURSUANT TO
18 U.S.C. §§ 981, 984 &
1955

Defendant-in-rem. :
----- x

D

WARRANT OF SEIZURE

TO: ANY SPECIAL AGENT OF THE FEDERAL BUREAU OF INVESTIGATION OR
ANY OTHER LAW ENFORCEMENT OFFICER AUTHORIZED BY LAW

An Affidavit having been made before me by Rebecca E. Vassilakos, a Special Agent of the Federal Bureau of Investigation ("FBI"), that she has reason to believe that the funds specified in the above-captioned bank account are subject to seizure and civil forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C), 981(b), 984, and 1955, and as I am satisfied that there is probable cause to believe that the property so described is subject to seizure and civil forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C), 981(b), 984, and 1955,

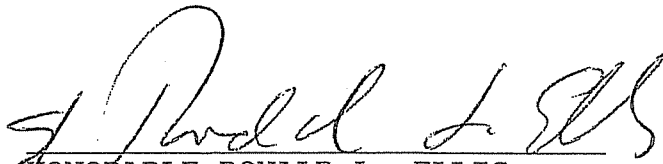
YOU ARE HEREBY COMMANDED AND AUTHORIZED to seize, within ten (10) days of the date of issuance of this warrant, by serving a copy of this warrant of seizure, upon the custodian of the bank account, if any, the funds described as follows:

ALL FUNDS ON DEPOSIT AT NEVADA COMMERCE BANK
IN ACCOUNT NUMBERS 0021002712 AND 0021002795,
HELD IN THE NAME OF G.I. HOLDINGS, AND ALL
PROPERTY TRACEABLE THERETO.

YOU ARE FURTHER COMMANDED AND AUTHORIZED to prepare a
written inventory of the property seized and promptly return this
warrant and inventory before this Court as required by law.

NEVADA COMMERCE BANK IS HEREBY COMMANDED to effect the
seizure of the contents of the above-referenced accounts and to
refuse the withdrawal of any amount from said accounts by anyone
other than duly authorized law enforcement agents, promptly to
provide law enforcement officers with the current account
balance, and continue to accrue any deposits, interest,
dividends, and any other amount credited to said account until
the aforementioned law enforcement agents direct that the
contents of said account be finally liquidated.

Dated: New York, New York
August 21st, 2009


HONORABLE RONALD L. ELLIS
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK