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Attorneys for Claimants

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	11-CV-2564 (LBS)
-against-	:	
	:	
POKERSTARS, et al.,	:	
	:	
Defendants;	:	
	:	
ALL RIGHT TITLE AND INTEREST IN THE	:	
ASSETS OF POKERSTARS, et al.,	:	
	:	
Defendants <u>In Rem</u> .	:	
-----	X	

**Verified Claim of Oldford Group Ltd., Rational Entertainment Enterprises Ltd.,
 Stelekram Ltd., and Sphene International Ltd. Pursuant to Rule G(5)(a) of the
 Supplemental Rules for Certain Admiralty and Maritime Claims**

Oldford Group Ltd., Rational Entertainment Enterprises Ltd., Stelekram Ltd., and Sphene International Ltd. (collectively, the Claimants) hereby make their claims to interest in certain defendants-in-rem, identified below.

I. Identification of the Claimants

- A. Oldford Group Ltd. (Oldford). Oldford is a British Virgin Islands corporation with its principal place of business in Douglas, Isle of Man.
- B. Rational Entertainment Enterprises Ltd. (REEL) is an Isle of Man corporation with its principal place of business in Douglas, Isle of Man.
- C. Stelekram Ltd. (Stelekram) is an Isle of Man corporation with its principal place of business in Douglas, Isle of Man.
- D. Sphene International Ltd. (Sphene) is a Gibraltar corporation with its principal place of business in Douglas, Isle of Man.

II. Specific Properties Claimed and Claimants' Interest in the Properties

Claimants asserts interests in the following properties:

- A. REEL and Oldford claim an ownership interest in all right, title and interest in Pokerstars, a trade name under which they do business.
- B. REEL claims an ownership interest in Pokerstars.com.
- C. Oldford claims an ownership interest in all right, title and interest in the assets of Oldford Group Ltd. and the assets of its subsidiaries, including, but not limited to, REEL, Sphene, and Stelekram.
- D. Insofar as the Amended Complaint seeks the forfeiture of these entities themselves, Oldford claims an ownership interest in all right, title and interest in

itself and its subsidiaries, including, but not limited to, REEL, Sphene, and Stelekram.

E. Oldford also claims a legal and equitable interest in the following as the account holder:

1. Account held at Credit Agricole (Suisse) SA, Switzerland, in the name of the Oldford Group Limited, IBAN CH1508741014093800001, and all funds traceable thereto.

F. REEL claims an ownership interest in all right, title and interest in the assets of Rational Entertainment Enterprises Ltd.

G. Insofar as the Amended Complaint seeks the forfeiture of Rational Entertainment Enterprises Ltd. itself, REEL claims an ownership interest in all right title and interest in Rational Entertainment Enterprises Ltd.

H. Stelekram claims an ownership interest in all right, title and interest in the assets of Stelekram Ltd.

I. Insofar as the Amended Complaint seeks the forfeiture of Stelekram Ltd. itself, Stelekram claims an ownership interest in all right, title and interest in Stelekram Ltd.

J. Sphene claims an ownership interest in all right, title and interest in the assets of Sphene International Ltd.

K. Insofar as the Amended Complaint seeks the forfeiture of Sphene International Ltd. itself, Sphene claims an ownership interest in the assets of Sphene International Ltd.

L. Sphene also claims a legal and equitable interest in the following as the account holder:

1. Account numbered 27351910081015 held at Credit Agricole (Suisse) SA, Switzerland, in the name of Sphene International Limited, IBAN CH8908741014319300001, and all funds traceable thereto;
2. Account held at Credit Agricole (Suisse) SA, Switzerland, in the name of Sphene (International) Limited, IBAN CH6208741014319300002, and all funds traceable thereto; and
3. All accounts held at Bank Hapoalim (Suisse) SA, Luxembourg, in the name of Sphene International, and all funds traceable thereto.

M. The accounts specified below contain funds deposited by players to be held in trust by Oldford and/or Stelekram or funds held in trust that were in the process of being returned to players, some of which have been repaid using other funds. Oldford and Stelekram cannot currently ascertain which accounts contain such funds and in what amounts, but on the foregoing basis, claim a legal and equitable interest in:

1. The Elie Accounts and Related Accounts.
 - (a) Account numbered 200003291 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto;
 - (b) Account numbered 200003317 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto;

- (c) Account numbered 200003325 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto;
 - (d) Account numbered 200003309 held at All American Bank, Des Plaines, Illinois, in the name of 21 Debit LLC, and all funds traceable thereto;
 - (e) Account number 201002907 at Barclays Bank, UK in the name of Hotwire Financial LLC, and all funds traceable thereto;
 - (f) Account number GB26BARC20473563472044 at Barclays Bank, UK in the name of Hotwire Financial LTD, and all funds traceable thereto;
 - (g) Account number 953500105 at Bank One Utah, in the name of 4 A Consulting, and all funds traceable thereto;
 - (h) Account number 730666271, at Whitney National Bank, New Orleans, Louisiana in the name of Ndeka LLC, and all funds traceable thereto;
 - (i) Account number 2919208124 at Bank of America, N.A. in the name of Credit Capital Funding, and all funds traceable thereto;
 - (j) Account numbered 32433 at New City Bank in the name of 21Debit LLC dba PS Payments, and all funds traceable thereto;
 - (k) Account numbered 32441 at New City Bank in the name of 21Debit LLC dba FLT Payments, and all funds traceable thereto;
- and

- (l) Account number 32506 at New City Bank in the name of 21Debit LLC, and all funds traceable thereto.

N. The accounts specified below contain funds deposited by players to be held in trust by Oldford and/or Sphene or funds held in trust that were in the process of being returned to players, some of which have been repaid using other funds. Oldford and Sphene cannot currently ascertain which accounts contain such funds and in what amounts, but on the foregoing basis, claim a legal and equitable interest in:

1. The Griting Account and Related Account, as well as the ASP Consultants, LLC Accounts, and the LST Financial Accounts.

- (a) Account numbered 972402309 held at UMPQUA Bank, Roseburg, Oregon, in the name of "ULTRA SAFE PAY," and all property traceable thereto; and
- (b) Account numbered 004-411-346034-838 held at Hong Kong and Shanghai Banking Corporation, Hong Kong, in the name of Griting Investments LTD, and all funds traceable thereto.
- (c) \$447,196.79 from account numbered 804815470 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto;
- (d) \$12,642.44 from account numbered 804815488 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto;

- (e) \$4,472.58 from account numbered 822823779 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto;
- (f) \$84.21 from account numbered 822824025 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto;
- (g) \$6,047.84 from account numbered 822824140 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto;
and
- (h) \$17,460.95 from account numbered 1003245502 in the name of ASP Consultants, LLC at JPMorgan and all property traceable thereto.
- (i) All funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520055501, held in the name of LST Financial, and all property traceable thereto;
- (j) All funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520057101, held in the name of LST Financial, and all property traceable thereto;
- (k) All funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520064401, held in the name of LST Financial, and all property traceable thereto;

- (l) All funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520065201, held in the name of LST Financial, and all property traceable thereto; and
- (m) All funds formerly on deposit at Four Oaks Bank and Trust Company, Four Oaks, North Carolina, in account numbered 520069501, held in the name of LST Financial, and all property traceable thereto.

2. The G.I. Holdings Accounts.

- (a) \$231,000.00 formerly on deposit at First Republic Bank in Account numbered 80000373283, held in the name of G.I. Holdings and all property traceable thereto;
- (b) \$124,178.72 formerly on deposit at Service 1st Bank of Nevada in Account numbered 2020003792 held in the name of G.I. Holdings and all property traceable thereto;
- (c) \$2,057,620.28 formerly on deposit at Wells Fargo Bank in Account numbered 5383346862 held in the name of G.I. Holdings and all property traceable thereto;
- (d) \$3,055,108.21 formerly on deposit at Citibank in account numbered 203023239 held in the name of G.I. Holdings and all property traceable thereto;

- (e) \$784,160.95 formerly on deposit at Citibank in account numbered 203118542 held in the name of G.I. Holdings and all property traceable thereto;
- (f) \$1,000.00 formerly on deposit at Citibank in account numbered 203118559 held in the name of G.I. Holdings and all property traceable thereto;
- (g) \$925.00 formerly on deposit at Citibank in account numbered 203118575 held in the name of G.I. Holdings and all property traceable thereto;
- (h) \$1,035,415.44 formerly on deposit at Nevada Commerce Bank in account numbered 0021002712 held in the name of G.I. Holdings and all property traceable thereto;
- (i) \$122,308.78 formerly on deposit at Nevada Commerce Bank in account numbered 0021002795 held in the name of G.I. Holdings and all property traceable thereto; and
- (j) \$3,029,711.94 formerly on deposit at City National Bank in Account Number 3701177950, held in the name of G.I. and all property traceable thereto.

3. The SNR Inc. Accounts.

- (a) \$30.27 formerly on deposit at Huntington National Bank in Account numbered 01662184444 held in the name of SNR, Inc. and all property traceable thereto;

- (b) \$1,057,797.29 formerly on deposit at Huntington National Bank in account numbered 01662184457 held in the name of SNR, Inc. and all property traceable thereto;
- (c) \$649,261.20 formerly on deposit at Huntington National Bank in Account numbered 01662191343 held in the name of SNR, Inc. and all property traceable thereto;
- (d) \$199,175.14 formerly on deposit at Bank of West in account numbered 658049382 held in the name of SNR, Inc. and all property traceable thereto;
- (e) \$4,925.00 formerly on deposit at Bank of America in account numbered 0952071585 held in the name of SNR, Inc. and all property traceable thereto;
- (f) \$25.00 formerly on deposit at Bank of America account numbered 0952071603, held in the name of SNR, Inc. and all property traceable thereto;
- (g) \$992,499.53 formerly on deposit at Citibank in Account numbered 203366638 held in the name of SNR, Inc. and all property traceable thereto; and
- (h) \$865,000.00 formerly on deposit at Bank of America in account numbered 0952071467, held in the name of SNR, Inc. and all property traceable thereto.

4. The Terricorp Inc. d/b/a TLC Global Accounts and Related Accounts.
- (a) Account numbered 27554003786 held at Royal Bank of Canada, Canada, in the name of Terricorp Inc. d/b/a TLC Global, and all fund traceable thereto;
 - (b) Account numbered 27554003760 held at Royal Bank of Canada, Canada, in the name of Terricorp Inc. d/b/a TLC Global, and all fund traceable thereto;
 - (c) Account numbered 27554001038 held at Royal Bank of Canada, Canada, in the name of Terricorp Inc. d/b/a TLC Global, and all fund traceable thereto;
 - (d) Account numbered 27551017789 held at Royal Bank of Canada, Canada, in the name of Terricorp Inc. d/b/a TLC Global, and all fund traceable thereto;
 - (e) Account numbered 4800198399 held at Harris Bank, Palatine, Illinois, and all funds traceable thereto;
 - (f) Account numbered GB81RBOS16630000368036 held at the Royal Bank of Scotland in the name of Voltrex Ltd., and all funds traceable thereto;
 - (g) Account numbered 2000059819596 held at Wachovia Bank, a division of Wells Fargo Bank, N.A., in the name of “Eastern Expressions,” and all funds traceable thereto;
 - (h) Account numbered 104773862842 held at Bendix Foreign Exchange, Toronto, Ontario, and all funds traceable thereto.

- O. The accounts specified below contain funds deposited by players to be held in trust by Oldford (and/or Stelekram and Sphene) or funds held in trust that were in the process of being returned to players, some of which have been repaid using other funds. Oldford, Stelekram, and Sphene cannot currently ascertain which accounts contain such funds and in what amounts, but on the foregoing basis, claim a legal and equitable interest in:

1. The Sunfirst Bank Accounts and Related Accounts.

- (a) 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;
- (b) 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;
- (c) Account numbered 27351910081015 held at Societe Generale Cyprus LTD, Cyprus, in the name of Golden Shores Properties Limited, and all funds traceable thereto;
- (d) Account numbered CY1211501001065983USDCACC002 held at FBME Bank LTD, Cyprus, in the name of Triple Seven Inc., and all funds traceable thereto;
- (e) Account numbered 5510045221 held at Wells Fargo, N.A., in the name of Triple Seven L.P., and all funds traceable thereto;
- (f) Account numbered 7478010312 held at Wells Fargo, N.A., in the name of Kombi Capital, and all funds traceable thereto;

- (g) 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; and
- (h) Account numbered 129000576 on deposit at Sunfirst Bank, St. George, Utah, formerly in the name, formerly in the name of Sunfirst Bank ITF Mastery Merchant/Psars, now in the name of Sunfirst Bank, and all funds traceable thereto.

2. The Vensure/Trinity Global Accounts.

- (a) Account numbered 1093 held at Vensure Federal Credit Union, Mesa, Arizona, in the name of Trinity Global Commerce Corp.
- (b) Account numbered 1200402039 held at Banca Privada D'Andorra, Andorra, in the name of Trinity Global Commerce Corp., and all funds traceable thereto; and
- (c) Account numbered MT54SBMT55505000000016782GAUSD0 held at Sparkasse Bank Malta PLC, Malta, in the name of Trinity Global Commerce Corp., and all funds traceable thereto.

III. No Admission of Jurisdiction

This appearance by the Claimants is expressly restricted to the defense of this *in rem* claim, is not an appearance for the purposes of any other claim, and does not constitute a waiver of jurisdiction. Claimants' express restriction comports with Rule E (8) of the Supplemental Rules for Certain Admiralty and Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure.

IV. Verification

The undersigned attests and declares under penalty of perjury under the laws of the United States of America that the information provided in support of this claim is true and correct to the best of his knowledge and belief, and that as a director of Oldford, REEL, Stelekram and Sphene, he is authorized to sign on their behalf.


Pinhas Schapira

Dated: October 31, 2011.

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on October 31, 2011, I caused a true copy of the foregoing:

- Verified Claim Pursuant to Rule G(5)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims

to be served by the Court's ECF system upon the following:

Jason H. Cowley
United States Attorneys Office
One Saint Andrew's Plaza
New York, NY 10007
212-637-1060
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Dated: October 31, 2011

/s/ David M. Zornow
David M. Zornow, Esq.