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Affidavit in Support of Seizure Warrants

I. Purpose of the Affidavit

This affidavit is respectfully submitted in support of four seizure warrants: two pertain to two domestic bank accounts; one pertains to nine foreign bank accounts in various countries; and one pertains to ten Internet domain names.

Bank Accounts

This Affidavit is submitted in support of three seizure warrants for the following accounts:

United States Accounts

- 1. The contents of account number 101308347 in the name of Linwood Payment Solutions at the Bank of Guam located in Hagatna, Guam.
- 2. The contents of account number 381006499721 in the name Linwood Payment Solutions at the Bank of America located in Charlotte, North Carolina.

Panama

- 3. The contents of account number 0104010838 in the name of Oneup Networks, S.A. at Metrobank, S.A. Panama City located in the Republic of Panama.
- 4. The contents of account number 4010148441 in the name of ThrillX Systems, S.A. at Credicorp Bank, located in the Republic of Panama.
- 5. The contents of account number 122038731 in the name of Sabana Investments S.A. at Banco Panameno De La Vivienda, located in the Republic of Panama.

Malta

- 6. The contents of account number 020664GAUSD0 in the name of Jasmin Services Corporation at Sparkasse Bank located in the Republic of Malta.

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7. The contents of account number 015309GAUSD0 in the name of BMX Entertainment SA at Sparkasse Bank located in the Republic of Malta.

Portugal

8. The contents of account number 4534335771305 in the name of BMX Entertainment at Banco Comercial Portugues located in Portugal.
9. The contents of account number 4536693191405 in the name of BMX Entertainment at Banco Comercial Portugues located in Portugal.

Netherlands

10. The contents of account number 0243058780 in the name of Chargestream Ltd at ABN AMRO Bank NV (FKA: Fortis Bank Netherland NV) located in the Netherlands.
11. The contents of account number 0242087787 in the name of Chargestream Ltd at ABN AMRO Bank NV (FKA: Fortis Bank Netherland NV) located in the Netherlands.

Your affiant submits that there is probable cause to believe that the contents of these accounts constitutes the proceeds of an illegal gambling business and is forfeitable pursuant to 18 U.S.C. sections 981(a)(1)(C) and 1955(d), and also that it was involved in money laundering transactions made in violation of 18 U.S.C. section 1956(a)(2)(A) and is subject to seizure and forfeiture pursuant to 18 U.S.C. section 981(a)(1)(A).

Domain names

This affidavit is also submitted in support of an application for a seizure warrant for the following internet domain names:

BOOKMAKER.COM, registered with with Gandi Sas 15 Place de la Nation, Paris France F-75011;

2BETDSI.COM, registered with GoDaddy.com, Inc., 14455 N. Hayden Rd., Suite 219, Scottsdale, AZ 85260;

011-2174 BPG *plus* 011-2177 BPG

FUNTIMEBINGO.COM, registered with GoDaddy.com, Inc.,
14455 N. Hayden Rd., Suite 219, Scottsdale, AZ 85260;

GOLDENARCHCASINO.COM, registered with Godaddy.com
Inc., 14455 N. Hayden Rd., Suite 219, Scottsdale, AZ
85260;

TRUEPOKER.COM, registered with Network Solutions 13861
Sunrise Valley Drive, Herndon, VA 20171;

BETMAKER.COM, registered with Gandi Sas 15 Place de la
Nation, Paris France F-75011;

BETGRANDESSPORTS.COM, registered with GoDaddy.com,
Inc., 14455 N. Hayden Rd., Suite 219, Scottsdale, AZ
85260;

DOYLESROOM.COM, registered with GoDaddy.com, Inc.,
14455 N. Hayden Rd., Suite 219, Scottsdale, AZ 85260;

BETEHORSE.COM, registered with Register.com Inc., 575
8th Avenue, 8th Floor, New York, NY 10018.

BETED.COM, registered with Domaininfo AB D/B/A
Domaininfo.com, William Gibsons vag, SE-433 76
Jonsered, Sweden.

Your affiant submits that there is probable cause to believe that these domain names constitute property used in violation of 18 U.S.C. section 1955 and are forfeitable pursuant to section 1955(d).

II. Affiant

Your affiant, M. Lisa Ward, has been a Special Agent with Homeland Security Investigations (HSI) for twenty years. During that time, I have prepared and executed numerous state and federal search and seizure warrants, worked on Title III court- authorized intercepts, seized evidence of both state and federal violations, interviewed numerous suspects, witnesses, and informants, and evaluated evidence obtained during the course of these investigations.

III. Applicable Statutes

18 U.S.C. section 1955

Conducting Illegal Gambling Business.

(a) Whoever conducts, finances, manages, supervises, directs, or owns all or part of an illegal gambling business shall be fined under this title or imprisoned not more than five years, or both.

(b) As used in this section-

(1) "illegal gambling business" means a gambling business which-

(i) is a violation of the law of a State or political subdivision in which it is conducted;

(ii) involves five or more persons who conduct, finance, manage, supervise, direct, or own all or part of such business; and

(iii) has been or remains in substantially continuous operation for a period in excess of thirty days or has a gross revenue of \$2000 in any single day.

(2) "gambling" includes but is not limited to poolselling, bookmaking.....

(3) "State" means any State of the United States.

* * *

(d) Any property, including money, used in violation of the provisions of this section may be seized and forfeited to the United States.

Maryland Criminal Code section 12-102

Betting, wagering, gambling and related activities.

(a) Prohibited. - A person may not:

(1) bet, wager or gamble;

(2) make or sell a book or pool on the result of a race, contest, or contingency;

* * *

(4) receive, become the depository of, record, register, or forward, or propose, agree, or pretend to forward, money or any other thing or consideration of value, to be bet wagered or gambled on the result of a race, contest, or contingency.

Title 31 U.S.C. section 5363

Unlawful Internet Gambling Enforcement Act

No person engaged in the business of betting or wagering may knowingly accept, in connection with the participation of another person in unlawful internet gambling -

* * *

(2) an electronic fund transfer, or funds transmitted by or through a money transmitting business, or the proceeds of an electronic funds transfer or money transmitting service, from or

on behalf of such other person;....

18 U.S.C. section 1084

Transmission of wagering information

- (a) Whoever being engaged in the business of betting or wagering knowingly uses a wire communication facility for the transmission in interstate or foreign commerce of bets, or wagers or information assisting in the placing of bets or wagers on any sporting event or contest, or for the transmission of a wire communication which entitles the recipient to receive money or credit as a result of bets or wagers, or for information assisting in the placing of bets or wagers, shall be fined or imprisoned not more than two years, or both.

Title 18 U.S.C. section 1956(a)(2)(A)

Money laundering

- (a)(2) Whoever transports, transmits, or transfers, or attempts to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States or to a place in the United States from or through a place outside the United States -
 - (A) with the intent to promote the carrying on of specified unlawful activity [shall have committed an offense];

* * *

- (c)(7) the term "specified unlawful activity" means -

* * *

- (A) any act or activity constituting an offense listed in § 1961(1) of this title...

* * *

[18 U.S.C. § 1961(1) defines the term "racketeering activity" to include 18 U.S.C. § 1955.]

Title 18 U.S.C. section 981

Asset forfeiture

- (a)(1) The following property is subject to forfeiture to the United States:

- (A) Any 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.

* * *

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

IV. Probable Cause

Introduction

The information set forth below is based upon your affiant's review of records and upon information provided by other sworn law enforcement officers participating in this investigation. Your affiant has not included each and every fact obtained pursuant to this investigation. Your affiant has set forth those facts that she believes are essential to establish the necessary foundation for the issuance of the seizure warrant for the specified account.

Background

Your affiant conducted a number of Internet searches and found the following: (1) that there are dozens of Internet gambling sites, such as BODOG, Pokerstars, FullTilt, and Absolute Poker, that allow a gambler to play various games of chance and to wager on the outcome of various sporting events; (2) that these sites allow gamblers to use various forms of payment to wager and then to receive payouts for winning; (3) that these companies are all physically located outside of the United States while the majority of the customers are found in the United States. Because customers are in the United States, these businesses rely upon the U.S. banking system to facilitate the movement of funds to and from their customers, the gamblers.

I know from my investigation of businesses involved in the online gaming industry that the operation of any internet gaming website requires the employment of dozens of individuals who conduct, finance, manage, supervise, and direct the gambling business. These businesses commonly employ persons in multiple locations with expertise in information technology, finance, accounting, customer support, marketing, and management. These

businesses commonly partner with/issue contracts for several different payment services allowing various options for customers to fund their gambling accounts, including e-wallets, pre-paid stored value cards, electronic check, ACH, and wire transfer services.

Recent developments, including a number of seizures of accounts connected with this activity, and the passage of the Unlawful Internet Gambling Enforcement Act of 2006, have made it increasingly difficult for Internet gaming operators to move money to and from their customers. Specifically, 31 U.S.C. section, 5363 prohibited the gaming operators from accepting nearly all forms of payment from players who gambled on their web-sites.

Payment Processors

Based on training and experience, your affiant knows that, in order to facilitate the movement of funds to and from their customers, Internet gambling operators began using money-processing businesses generally called "payment processors." Typically, an Internet gaming operator directs the payment processor to collect funds from individual gamblers, funds intended to be used to wager with the gambling organization; the payment processor then notifies the gambling organization when the funds are available. The gaming operator also may send a large check or wire transfer from an off-shore bank directly to the payment processor who then distributes the money, at the direction of the gaming site operators, to gamblers for their winnings. The payment to the gambler is accomplished either by check or electronic funds transfer.

Linwood Payment Solutions

The Department of Homeland Security Investigations (HSI) in Baltimore, Maryland, opened an undercover payment processor business under the name of Linwood Payment Solutions (Linwood) in an effort to identify online gambling organizations utilizing third party payment processors in the United States. According to undercover agents, they obtained a business address near Atlantic City, New Jersey, established a website on the Internet, opened bank accounts, and set up a payment processing plant with a number of employees capable of handling thousands of transactions on a daily basis. Undercover agents then had person-to-person contact with top managers of gambling organizations to discuss the Internet gambling business, to negotiate contracts and terms of the processing, and to handle the intricate movement and processing of collection and payment data from the gambling organizations to the banks. Meetings and contacts with these managers were monitored and recorded.

Linwood then processed millions of dollars in transactions during the past two years for a number of Internet gambling organizations including Absolute Poker, Ultimate Bet, BetEd, K23 Group Financial Services doing business as BMX Entertainment Limited, and Nemesis Group doing business as Chargestream Ltd. Undercover agents confirmed that their contacts with each of these organizations were with at least five persons who conducted the business activity.

The gambling organizations.

Top managers of Absolute Poker and Ultimate Bet were named in an indictment in the Southern District of New York in mid-April 2011. They were charged with conducting illegal internet gambling businesses and with money laundering, among other

offenses. BetEd, K23, and some top managers were charged in two indictments in the District of Maryland that will be unsealed on May 20, 2011. They are charged with conducting illegal internet gambling businesses and with money laundering.

All of the transactions conducted by Linwood involved (1) the collection of gambling funds from individual gamblers at the direction of the gambling organizations, (2) the payment of gambling winnings from the gambling organizations to the gamblers at the direction of the gambling organizations, or (3) the transfer of collected gambling proceeds off-shore to foreign banks at the direction of the gambling organizations. Because the gambling organizations must cover the expenses of running the gambling business, such as salaries of at least dozens of employees, purchase of the latest computer equipment, payment for internet services, rents, and accounting services, there is reason to believe that the funds wired off-shore were used to pay for these essential business expenses.

During the period of time when Linwood was processing payments for BetEd, K23 Group, and Nemesis Group, undercover agents examined each of the related gambling sites and confirmed that each offers poker, casino, or sports betting to players in Maryland. Agents in Maryland actually opened accounts and gambled on several of these websites during the period of time when Linwood was processing payments for BetEd, K23, and Nemesis Group. Agents conducted an extensive review of Linwood bank transaction files and confirmed that there are numerous individuals in Maryland who have authorized payments to these businesses.

Open source research showed that BETED.COM is a sportsbook and casino, the flagship of Thrillx Systems Limited, a

registered company in British Columbia, Canada, with business and creative offices in Vancouver, Canada and corporate office in San Jose, Costa Rica. The company has over 10 years in the online gambling industry. Thrillx Systems is a software solutions provider producing online sportsbook and casino software, incorporating the most recent technology, merchant banking and security implementation tools.

Open source research also showed that K23, doing business as BMX Entertainment operates six websites including Bookmaker.com that offer online sports betting services. Bookmaker.com offers online sports betting on sporting events, including football, basketball, hockey, tennis, soccer, boxing, martial arts, and volleyball. It also offers horse racing, online casino games, poker, bingo, and mobile betting. The company serves professional and recreational players. BMX Entertainment Limited was founded in 1996 and is based in Limsassol, Cyprus.

During contract negotiations with Nemesis Group, a top manager stated that Nemesis Group had been running an e-wallet business under the name of EcoCard for about five years. Nemesis was establishing a processing relationship with Linwood in order to expand its payment processing in the U.S. Open source research of EcoCard indicates that it maintained advertising links with a number of online gambling sites, including Absolute Poker, Ultimate Bet, Poker Time, and Mansion Poker. The ECO Card website stated that "Club EcoCard has teamed up with various online gaming sites..."

After Linwood finalized a contract to provide payment processing services to Nemesis Group, a manager for Nemesis directed the movement of collected gambling proceeds to two

accounts in the name of ChargeStream. Open source research showed that ChargeStream is a British Company offering a suite of payment services and products to on-line merchants. EcoCard and ChargeStream have the same address. Bank records also confirm a business relationship between ChargeStream Ltd. and Nemesis.

On November 12, 2009, a Maryland-based online gambler and cooperating informant (CI-5) was interviewed regarding personal gambling activity. CI-5 confirmed that he/she frequented various gambling sites, opened accounts, and gambled in Maryland. CI-5 agreed to set up online gambling accounts and was provided with \$500 to be used for placing bets on various gambling websites. CI-5 created an account on the site www.beted.com. Over a period of time, CI-5 placed several bets on the sportsbook area of the website. CI-5 requested the balance of the account be cashed out. CI-5 requested a check for the \$100 balance and was told by employees of www.beted.com that they no longer paid out winnings via check. CI-5 was told that beted.com would send \$100 directly into his/her bank account. Analysis of CI-5'S bank records showed that on March 30, 2010, an online wire transfer of \$100 showed up in CI-5 bank account. The source of the wire transfer was Linwood.

The Linwood bank accounts

According to the undercover agents, Linwood's bank accounts were used to process collections and payouts on behalf of the gambling organizations. According to the undercover agents, Linwood was directed by BetEd, BMX Entertainment Limited, and Nemesis Group to transfer by wire some of the gambling proceeds that were collected to Oneup Networks, S.A.; ThrillX Systems, S.A.; BMX Entertainment S.A.; Jasmin Services Corporation;

Sabana Investments S.A; and Chargestream Ltd. Bank records show that Linwood used two domestic banks to handle these transactions:

1. Account number 101308347 in the name of Linwood Payment Solutions at the Bank of Guam located in Hagatna, Guam; and
2. Account number 381006499721 in the name Linwood Payment Solutions at the Bank of America located in Charlotte, North Carolina.

These are the same two accounts used by Linwood to accumulate the collected gambling proceeds at the direction of the gambling organizations. Any funds in these two accounts are such gambling proceeds.

Linwood Wire Transfers

Bank records pertaining to the Linwood accounts show that between December 2009 and January 2011, Linwood processed in excess of 300,000 separate transactions, worth more than \$33 million, all of which is gambling proceeds that included a number of transactions for individuals in Maryland.

The Linwood bank records also show numerous outgoing wire transfers between February 2010 and March 2011, worth more than \$2.5 million of collected gambling proceeds, at the direction of BET-ED to the following foreign accounts:

Oneup Networks, S.A. / Metrobank, S.A. Panama City/ account #0104010838

ThrillX Systems, S.A. /Credicorp Bank, Rep of Panama/ account #4010148441

Sabana Investments S.A./Banco Panameno De La Vivienda, Rep of Panama/ account #122038731

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The Linwood bank records also show wire transfers between February 2011 and April 2011 worth more than \$91,000 of collected gambling proceeds at the direction of K-23 to the following foreign accounts:

**BMX Entertainment SA/ Sparkasse Bank Malta/ account
#015309GAUSD0**

**Jasmin Services Corporation/ Sparkasse Bank Malta/ account
020664GAUSD0/EURO**

Wells Fargo bank records also show that from May through August 2010, 248 wire transfers were originated from **BMX Entertainment S.A.** account 4534335771305 at Banco Comercial Portugues. Most of these wire transfers were made in rounded multiples between \$10,000 and \$50,000 and were directed to various locations including Wells Fargo U.S. based customers. Several of the U.S.-located companies that received these wires from this BMX account are businesses that are set up to support online gambling.

Capital One bank recently also identified activity that bank officers indicated as gambling activity after a number of Capital One customers initiated and received wire transfers in round numbers to and from account 4536693191405 in the name **BMX Entertainment S.A.** at Banco Comercial Portugues and to account number 015309GAUSD0 at the Sparkasse Bank Malta. This same Sparkasse Bank Malta account also received funds through Linwood as is mentioned above.

The Linwood bank records also show wire transfers between April 21, 2011 and May 6, 2011, totaling \$15,920.30 of collected gambling proceeds at the direction of Nemesis Group to the following two foreign accounts:

**Chargestream Ltd /ABN AMRO Bank NV (FKA: Fortis Bank
Netherland NV)/accounts 0243058780 and 0242087787.**

DOMAIN NAMES

According to the undercover agents, each of the gambling organizations submitted applications for processing services. Each application requested "Company Information" and asked for a list of all website URL's (Uniform Resource Locator, which is essentially a pointer to a "resource" on the World Wide Web); this website information was then used in the contract for services. A representative of K23 Group provided information for three contracts. The first contract, signed in October of 2010, reflects a legal company name of BMX ENTERTAINMENT S.A. and listed seven website URL's as follows: www.bookmaker.com, www.2betdsi.com, www.funtimebingo.com, www.goldenarchcasino.com, www.betmaker.com, www.betgrandesports.com, and www.betehorse.com

The second contract with K23, signed in February of 2011, reflects a legal company name of MAFISH Corporation, and listed a website URL of www.doylesroom.com. The third contract with K-23, signed in February of 2011, reflects a legal company name of TPCR LIMITED and lists a URL of www.truepoker.com. I have also reviewed a Merchant Application provided by a representative of BETED, signed in October of 2009, which reflects a legal name of company of SABANA INVESTMENTS & TRADE S.A. and which specifies the website URL of www.beted.com. Undercover agents examined each of these sites and confirmed that each offers poker, casino, or sports betting. Agents actually opened accounts and gambled on several of these websites during the period of time when Linwood was processing payments for BetEd, K-23, and Nemesis Group. Also, email traffic with the contract organizations confirm that Linwood processed transactions for these accounts.

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The procedures for accomplishing the seizure of domain names are set forth in Attachment B to this application and affidavit. Domain names are registered and activated by VeriSign and others, known as "registries." Upon seizure of the domain names by ICE, VeriSign will be directed to point the specified domain names to a particular IP internet address, which will display a web page notifying users that the domain names have been seized by the government.

Also, there are internet "registrars" who maintain certain records relating to the owner of each domain name for which it is the registrar, including the domain names specified in this affidavit. Some of these records are available to the public; so, at the time that the specified domain names are seized, the relevant registrars will be directed to change the "Technical Contact" and "Administrative Contact" fields of the domain name records to contact information relating to ICE to reflect the fact that the DOMAIN NAMES have been seized by the government.

Commingled Funds

Your affiant knows that courts have held that there is no requirement that a substantial portion of the commingled funds in an account be derived from the criminal activity, so long as there is some evidence that some of the commingled funds were from criminal activity. United States V. Ward, 197 F.3d 1076 (11th Cir. 1999). The Fourth Circuit has also stated that when funds are drawn from a commingled account, the government is entitled to a presumption that the transaction involves criminally derived funds. United States V. Wilkinson, 137 F.3d 214 (4th Cir. 1998).

Your affiant knows that in forfeiture cases, the probable cause standard is the same as that in search and seizure cases,

requiring a court "to make a practical, common-sense decision whether, given all the circumstances set forth ... there is a fair probability' that the properties to be forfeited are proceeds of illegal ... transactions." United States v. Thomas, 913 F.2d 1111, 1114 (4th Cir. 1990) (drug case).

Warrants for out of state and foreign accounts

Based upon my training and experience, I know that 18 U.S.C. section 981(b)(3) provides that "a seizure warrant may be issued ... by a judicial officer in any district in which a forfeiture action against the property may be filed under Section 1355(b) of title 28, and may be executed in any district in which the property is found, or transmitted to the central authority of any foreign state for service in accordance with any treaty or other international agreement." According to 28 U.S.C. Section 1355(b), a forfeiture action may be brought in "the district court for the district in which any of the acts or omissions giving rise to the forfeiture occurred...." Because some of the gambling transactions were conducted in Maryland and some of the payouts of gambling proceeds were sent to Maryland, the forfeiture action can be brought in Maryland, and the seizure warrants may be issued in Maryland. Your affiant intends to use this affidavit in support of a complaint in a judicial forfeiture case to cause the issuance of a warrant of arrest in rem, pursuant to Rule G(3)(b) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, by the U.S. District Court that directs the Department of Justice to use the current Mutual Legal Assistance Treaties between the United States and Panama, the United States and Malta, the United States and Portugal, the United States and the Netherlands in order to request execution of the warrant of

arrest in rem in those countries.

V. Conclusion

Based on the foregoing, I submit that there is probable cause to believe that the contents of the following accounts constitutes the proceeds of an illegal gambling business and is forfeitable pursuant to 18 U.S.C. sections 981(a)(1)(C) and 1955(d), and also that it was involved in money laundering transactions made in violation of 18 U.S.C. section 1956(a)(2)(A) and is subject to seizure and forfeiture pursuant to 18 U.S.C. section 981(a)(1)(A):

1. The contents of account number 101308347 in the name of Linwood Payment Solutions at the Bank of Guam located in Hagatna, Guam.
2. The contents of account number 381006499721 in the name Linwood Payment Solutions at the Bank of America located in Charlotte, North Carolina.

Panama

3. The contents of account number 0104010838 in the name of Oneup Networks, S.A. at Metrobank, S.A. Panama City located in the Republic of Panama.
4. The contents of account number 4010148441 in the name of ThrillX Systems, S.A. at Credicorp Bank, located in the Republic of Panama.
5. The contents of account number 122038731 in the name of Sabana Investments S.A. at Banco Panameno De La Vivienda, located in the Republic of Panama.

Malta

- 6. The contents of account number 020664GAUSD0 in the name of Jasmin Services Corporation at Sparkasse Bank located in the Republic of Malta.
- 7. The contents of account number 015309GAUSD0 in the name of BMX Entertainment SA at Sparkasse Bank located in the Republic of Malta.

Portugal

- 8. The contents of account number 4534335771305 in the name of BMX Entertainment at Banco Comercial Portugues located in Portugal.
- 9. The contents of account number 4536693191405 in the name of BMX Entertainment at Banco Comercial Portugues located in Portugal.

Netherlands

- 10. The contents of account number 0243058780 in the name of Chargestream Ltd at ABN AMRO Bank NV (FKA: Fortis Bank Netherland NV) located in the Netherlands.
- 11. The contents of account number 0242087787 in the name of Chargestream Ltd at ABN AMRO Bank NV (FKA: Fortis Bank Netherland NV) located in the Netherlands.

Your affiant also submits that there is probable cause to believe that the following domain names constitute property used in violation of 18 U.S.C. section 1955 and are forfeitable pursuant to 18 U.S.C. section 1955(d), and should be seized using the procedures set forth in Attachment B:

BOOKMAKER.COM, registered with with Gandi Sas 15 Place de la Nation, Paris France F-75011;

2BETDSI.COM, registered with GoDaddy.com, Inc., 14455 N. Hayden Rd., Suite 219, Scottsdale, AZ 85260;

FUNTIMEBINGO.COM, registered with GoDaddy.com, Inc., 14455 N. Hayden Rd., Suite 219, Scottsdale, AZ 85260;

2011-2-17 BPG *thru* 2011-2-17 BPG

GOLDENARCHCASINO.COM, Registered with Godaddy.com, Inc., 14455 N. Hayden Rd., Suite 219, Scottsdale, AZ 85260;

TRUEPOKER.COM, Registered with Network Solutions 13861 Sunrise Valley Drive, Herndon, VA 20171;

BETMAKER.COM, registered with Gandi Sas 15 Place de la Nation, Paris France F-75011;

BETGRANDESSPORTS.COM, registered with GoDaddy.com, Inc., 14455 N. Hayden Rd., Suite 219, Scottsdale, AZ 85260;

DOYLESROOM.COM, registered with GoDaddy.com, Inc., 14455 N. Hayden Rd., Suite 219, Scottsdale, AZ 85260;

BETEHORSE.COM, registered with Register.com Inc., 575 8th Avenue, 8th Floor, New York, NY 10018.

BETED.COM, registered with Domaininfo AB D/B/A Domaininfo.com, William Gibsons vag, SE-433 76 Jonsered, Sweden.



M. Lisa Ward
Special Agent
Homeland Security Investigations

Subscribed and sworn before me on May 20, 2011.



Beth P. Gesner
United States Magistrate Judge