## U.S. Department of Justice



## United States Attorney Southern District of New York

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

February 19, 2013

## **BY HAND**

Honorable Kimba M. Wood United States District Judge United States Courthouse 500 Pearl Street, Room 1910 New York, NY 10007

Re:

United States v. Pokerstars, et al.,

11 Civ. 2564 (KMW)

Dear Judge Wood:

Please find enclosed a proposed stipulated order of settlement (the "Settlement") regarding claimant/defendant Christopher Ferguson ("Ferguson").

Pursuant to the Settlement, Ferguson agrees to forfeit certain property to the United States, including all funds in a particular account that is set forth in the Second Amended Complaint (the "Ferguson Account Funds").

Because at least one other claimant, Cardroom International, has arguably asserted a claim to the Ferguson Account Funds, the Government shall maintain the Ferguson Account Funds in a seized asset account until such claims are resolved.

Respectfully submitted,

PREET BHARARA

United States Attorney for the Southern District of New York

By:

Sharon Cohen Levin Michael D. Lockard Jason H. Cowley

Assistant United States Attorney (212) 637-1060/2193/2479

cc (cover letter only):

Cyrus Sanai and Zachary Kozak, counsel for Cardroom International Jon Harris, counsel for Christopher Ferguson