PLEASE READ THIS ENTIRE NOTICE CONCERNING SETTLEMENTS WITH FULL TILT POKER ("FTP") AND POKERSTARS. IT IS TIME-SENSITIVE AND MAY AFFECT YOUR LEGAL RIGHTS. IF YOU SATISFY THE ELIGIBILITY CRITERIA DESCRIBED BELOW, YOU MAY BE ENTITLED TO PAYMENT. YOU CAN ALSO VISIT www.fulltiltpokerclaims.com FOR ADDITIONAL INFORMATION.

I. Purpose of this Notice

The purpose of this Notice is to inform you that you may be entitled to receive a distribution from the assets forfeited by Full Tilt Poker (the "FTP Fund"), which resulted from the settlement agreement resolving the allegations in the amended civil forfeiture complaint in *United States v. PokerStars, et al.*, 11 Civ. 2564 (LBS), pending in the United States District Court for the Southern District of New York (the "Action"). You must complete the online Petition filing process in accordance with the steps in this Notice in order to be potentially eligible to share in the distribution from the FTP Fund. This Notice is being sent to all potentially eligible victims of FTP's fraud who have been identified by The Garden City Group, Inc. ("GCG"), the Claims Administrator retained by the United States, utilizing data supplied by FTP. As explained in greater detail below, Petitions for Remission must be completed online through the administration website at www.FullTiltPokerClaims.com.

THE DEADLINE TO SUBMIT A PETITION FOR REMISSION IS NOVEMBER 16, 2013 (THE "BAR DATE"). IF YOU FAIL TO SUBMIT A TIMELY AND COMPLETE PETITION FOR REMISSION, YOU WILL BE BARRED FROM RECEIVING A PAYMENT FROM THE FTP FUND. WHEN FILING ONLINE, YOU MUST USE THE NUMBERS BELOW IN ORDER TO BEGIN THE PETITION PROCESS:

Petition Number: 1012051

Control Number: 1616994239

II. Background

In July 2012, the United States entered into settlement agreements with FTP and PokerStars, two of the three online poker companies named as defendants in the Action brought by the United States alleging bank fraud, wire fraud, money laundering, and illegal gambling offenses. Under the terms of the settlement with FTP, the company agreed to forfeit virtually all of its assets to the United States in order to fully resolve the Action. The amended complaint filed in the Action alleged that FTP defrauded its players by misrepresenting to the public that player funds held by FTP were safe, secure and available for withdrawal at any time. In reality, the company did not maintain funds sufficient to repay all of its players and instead, utilized player funds to finance more than \$400 million in dividend payments to FTP's owners.

Under the terms of the settlement with PokerStars (the "PokerStars Settlement"), the company agreed, among other things, to forfeit \$547 million to the United States and to assume

FTP's liability for the approximately \$184 million owed by FTP to foreign players. The PokerStars Settlement also provides that PokerStars will acquire Full Tilt's forfeited assets from the Government and precludes PokerStars from offering online poker for real money in the United States unless and until it becomes permissible to do so under relevant law.

Utilizing funds forfeited from PokerStars, the United States Attorney for the Southern District of New York and the Asset Forfeiture and Money Laundering Section ("AFMLS") of the United States Department of Justice have established a Petition process by which eligible U.S. fraud victims can seek compensation for their losses.

III. <u>Eligibility Criteria</u>

To qualify for a payment from the FTP Fund, you must satisfy certain eligibility criteria described below. Those criteria include the following:

- 1. You must be a U.S. citizen or you must have resided in the United States at the time of playing on the FTP gaming site.
- 2. You did not receive compensation as a foreign FTP player in connection with the PokerStars Settlement.
- 3. You must have deposited funds into an account with FTP.
- 4. Your account with FTP must reflect a balance owed by FTP to you as of April 15, 2011.

5. You are excluded from participation in the remission process if you are:

- A past or present employee of FTP or any of its past or present affiliates;
- A past or present vendor of FTP that received compensation through FTP players' accounts;
- A past or present Team Full Tilt player;
- A past or present shareholder of FTP, Tiltware LLC, Kolyma Corporation A.V.V., Pocket Kings Ltd., Pocket Kings Consulting Ltd., Filco Ltd., Vantage Ltd., Ranston Ltd., Mail Media Ltd., or Full Tilt Poker Ltd.;
- A past or present officer or director of FTP, Tiltware LLC, Kolyma Corporation A.V.V., Pocket Kings Ltd., Pocket Kings Consulting Ltd., Filco Ltd., Vantage Ltd., Ranston Ltd., Mail Media Ltd., or Full Tilt Poker Ltd., or any of their past or present affiliates;
- A defendant in any civil action or a claimant in any forfeiture action brought by the Department of Justice related to the violations alleged in this action, or any related action (or any of his or her affiliates, assigns, heirs, distributees, spouses, parents, children, or controlled entities); or

• A person who, as of the Bar Date, has been the subject of criminal charges related to the violations alleged in this action, or any related action (or any of his or her affiliates, assigns, heirs, distributees, spouses, parents, children, or controlled entities).

Please be advised that receipt of this Notice does not indicate that you have been determined to be eligible to participate in the FTP Petition for Remission process; if AFMLS determines at any time, before or after you submit a Petition, that you are not eligible for remission, your Petition will be denied.

IV. The Distribution Formula

The amount that an Eligible Petitioner is entitled to receive will equal the final balance in the Petitioner's account with FTP as of April 15, 2011 (the "FTP Account Balance"). You may view your FTP Account Balance through the online claim filing process at www.FullTiltPokerClaims.com. Once you log on using the Petition Number and Control Number set forth above, you will receive directions for accessing your account information and filing a petition and/or disputing the reported account balance.

If the funds available for distribution from the FTP Fund equal or exceed the aggregate FTP Account Balances for all eligible Petitioners, each eligible Petitioner with an approved claim shall receive the entirety of his or her FTP Account Balance. If the aggregate FTP Account Balances for all eligible Petitioners exceed the monies available for distribution, payments shall be made to eligible Petitioners on a pro rata basis.

Prior to the payment of funds to a Petitioner, GCG will provide the Petitioner's Social Security or other Taxpayer Identification Number to the Government, in order to offset and collect any qualifying debts currently listed in the Treasury Offset Program Database.

V. Online Filing Deadline

ALL PETITIONS FOR REMISSION MUST BE SUBMITTED ONLINE THROUGH THE CASE WEBSITE AT <u>WWW.FULLTILTPOKERCLAIMS.COM</u> BY NOVEMBER 16, 2013.

VI. <u>Petition Determinations</u>

GCG will email to each Petitioner AFMLS's determination concerning his or her Petition. If a Petition is denied in whole or in part, GCG will state the reason for such denial and the Petitioner can appeal the ruling through the reconsideration process.

PLEASE BE SURE TO NOTIFY THE CLAIMS ADMINISTRATOR OF ANY CHANGES TO YOUR EMAIL ADDRESS. YOU MAY CONTACT THE CLAIMS ADMINISTRATOR

AT

INFO@FULLTILTPOKERCLAIMS.COM OR CALL TOLL-FREE AT (866) 250-2640.

PLEASE CHECK THE WEBSITE WWW.FULLTILTPOKERCLAIMS.COM FOR UPDATES.