COMMONWEALTH OF KENTUCKY
FRANKLIN CIRCUIT COURT
DIVISION II
CIVIL ACTION NO. 08-CI-1409

COMMONWEALTH OF KENTUCKY
ex rel. J. Michael Brown, Secretary,
Justice and Public Safety Cabinet — PLAINTIFF

vs.

141 INTERNET DOMAIN NAMES — DEFENDANTS

DEFENDANT GOLDENPALACE.COM'S MOTION FOR RELIEF FROM THE COURT'S SEIZURE ORDER

Comes the Registrant for Defendant Goldenpalace.com ("GP") by and through counsel, and for its Motion for Relief from the Court's September 18, 2008 Seizure Order hereby states as follows:

As is more fully articulated in the attached Memorandum in Support of GP's Motion for Relief from the Court's September 18, 2008 Seizure Order, the Court, in its October 16, 2008 Opinion and Order, held that "maintenance of a website or Internet advertisement alone, without more, is not enough to constitute presence for purposes of state court jurisdiction analysis." As a result, the Court stated that because "goldenpalace.com is limited to maintaining [a] website and providing advertisement for third-party gambling websites...the Court's [September 18, 2008] seizure order should be withdrawn as to [goldenpalace.com]."

Additionally, as demonstrated by the evidence submitted to the Court by the Commonwealth at the September 18, 2008 hearing, GP does not offer U.S. play for money, but rather, as noted by the Court above, only advertises for third-party gambling

websites. GP therefore seeks relief from the Court's September 18, 2008 Seizure Order and dismissal from the above-captioned matter.

WHEREFORE, GP respectfully requests that pursuant to the Court's October 16, 2008 Opinion & Order, the Court relieve GP from its September 18, 2008 Seizure Order, dismiss GP from the case, and allow GP to recover its costs and expenses incurred herein, including reasonable attorneys' fees, along with any and all other relief to which it may be entitled.

NOTICE

PLEASE TAKE NOTICE that the above Motion will be heard before the Honorable Thomas Wingate, Circuit Court Judge, Division II, Franklin Circuit Court, 218 Saint Clair Street, Frankfort, Kentucky 40601 on Wednesday, October 22, 2008 at 9:30 a.m. or as soon thereafter as possible.

Respectfully submitted,

By: Alison Lundergan Grimes

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Alison Lundergan Grimes
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Ph: (859) 231-3000

Counsel for the Registrant of Goldenpalace.com

CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of the foregoing has been served this 21st day of October 2008, upon the following:

Via hand delivery:

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William C. Hurt, Jr.
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And Via E-Mail:

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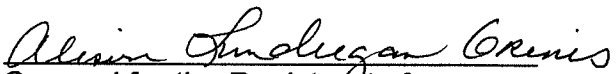
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vs.

141 INTERNET DOMAIN NAMES — DEFENDANTS

DEFENDANT GOLDENPALACE.COM'S MEMORANDUM IN SUPPORT OF ITS MOTION FOR RELIEF FROM THE COURT'S SEIZURE ORDER

The Registrant for Defendant Goldenpalace.com ("GP")[1] hereby submits this Memorandum in Support of its Motion for Relief from the Court's September 18, 2008 Seizure Order and dismissal from the Complaint filed by the Plaintiff, J. Michael Brown, Secretary of the Justice and Public Safety Cabinet ("Secretary").

I. INTRODUCTION

In its October 16, 2008 Opinion and Order, the Court held that "maintenance of a website or Internet advertisement alone, without more, is not enough to constitute presence for purposes of state court jurisdiction analysis." GP meets the Court's criteria for dismissal from this case as outlined by counsel for GP at the September 26, 2008 and October 7, 2008 hearings. Additionally, evidence submitted to the Court by the Commonwealth at the *ex parte* September 18, 2008 hearing further confirms that no transactions for U.S. money occur at goldenpalace.com. Thus, as the Court stated in its

[1] Although the Secretary has not alleged that this Court has personal jurisdiction over any of the domain name registrants, the Registrant of goldenpalace.com is appearing for the limited purpose of contesting jurisdiction and seizure of the domain name. The Registrant is not submitting to the general jurisdiction of the Court and therefore reserves all defenses relating to personal jurisdiction over the Registrant and/or the domain name.

October 16, 2008 Opinion and Order, because "goldenpalace.com is limited to maintaining [a] website and providing advertisement for third-party gambling websites...the Court's [September 18, 2008] seizure order should be withdrawn as to [goldenpalace.com]." But despite this express direction, the Secretary has refused to agree to dismiss GP. Accordingly, GP moves the Court to be relieved from the Court's Seizure Order as amended, and dismissed from the above-captioned matter.

II. FACTS

On August 26, 2008, J. Michael Brown, Secretary of the Justice and Public Safety Cabinet ("Secretary"), filed under seal, an *in rem* civil Complaint purportedly on behalf of the citizens of the Commonwealth against 141 domain names such as GP, alleging public nuisance and seeking forfeiture of the domain names pursuant to KRS § 528.100.[2] The Secretary stated the civil *in rem* action was being brought by the Commonwealth who was "exercising its police powers and pursuant to KRS § 528.100" in order to stop illegal Internet gambling from occurring in Kentucky.[3] The Secretary also filed an *ex parte* Motion requesting that the Court consider his Motion for Seizure of the domain names without any opportunity for interested parties to be heard.

On September 18, 2008, the Court granted the Secretary's Motion and held an *ex parte* hearing following which, it entered a Seizure Order, directing that the registrars for the respective domain names to surrender the registration of those domain names to the Secretary. Further, the Seizure Order required the Secretary to "use reasonable

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[2] *See* Plaintiff's Complaint, ¶ 1.

[3] *Id.*

efforts to give notice by overnight courier, email or facsimile to the party identified by the WHOIS information as claiming ownership of each domain name.[4]

GP, however, the real party in interest, does not accept U.S. play, is not located in Kentucky, nor registered with a Kentucky based registrar, and never: (1) received notice of the Secretary's Motion for Seizure *or* had an opportunity to be heard at that *ex parte* hearing; or (2) was ever properly served with the Secretary's Complaint.[5] As a result, GP moved to dismiss the Complaint and set aside the Court's September 18, 2008 Seizure Order, on among other things, grounds that GP does not offer "gambling" to U.S. residents, and any attempt to ban Internet sites from mere advertising violates the First Amendment to the United States Constitution.

GP's Motion, along with a number of other motions, were heard by the Court on October 7, 2008. On October 18, 2008, the Court issued its Opinion and Order which stated, among other things, that "maintenance of a website or Internet advertisement alone, without more, is not enough to constitute presence for purposes of state court jurisdiction analysis."[6] As a result, the Court stated "the Court's [September 18, 2008] Seizure Order should be withdrawn as to [goldenpalace.com], who "is limited to maintaining [a] website and providing advertisement for third-party gambling websites."[7]

Accordingly, in order to conserve resources and avoid wasting the Court's time, GP sought dismissal from the above-captioned matter via agreed order from the

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[4] *See* September 18, 2008 Seizure Order, ¶ 6.

[5] Indisputably, the identity of the Registrant for goldenpalace.com is and has been at all times during the course of this matter, publicly available on the WhoIs.com database.

[6] *See* Court's October 16, 2008 Opinion and Order.

[7] *Id.*

Secretary.[8] The Secretary, however, refused to dismiss GP, claiming that the Court "did not make a determination in its October 16, 2008 Opinion and Order that GP only provides advertising for third-party gambling websites."[9] GP now moves this Court, pursuant to its October 16, 2008 Opinion and Order, to be relieved from the Court's Seizure Order and dismissed from the above-captioned matter.[10]

III. ARGUMENT

Pursuant to the Secretary's Complaint, GP is a named Defendant because it allegedly violates KRS §§ 528.020 and/or 525.030 which criminalize "promoting gambling." Setting aside for the moment the fact that only an individual can be found guilty of promoting (*i.e.*, advancing) gambling, which GP is not, GP does not in accordance with this Court's October 16, 2008 Opinion and Order, "advance" gambling as required under the statutes because it does not accept U.S. play for money.[11] The alleged "evidence" submitted by the Secretary to the Court at the September 18, 2008 *ex parte* hearing further confirms this because no transaction for U.S. money occurred and/or can occur at goldenpalace.com.[12]

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[8] *See* Exhibit 1: October 17, 2008 Letter from GP to Secretary.

[9] *See* Exhibit 2: October 20, 2008 Letter from Secretary to GP.

[10] Due to the Court's express direction to relieve GP from the September 18, 2008 Seizure Order as amended, GP moves the Court for relief prior to the forfeiture hearing because granting the relief now will: (1) alleviate any unnecessary confusion with the Court's scheduled November 17, 2008 forfeiture proceedings, simplifying the issues to be dealt with at that hearing; (2) the interests of justice favor resolving the matter now in order to avoid any further unnecessary time or expense on the part of GP to have its counsel before the Court; and (3) no prejudice to the Commonwealth will result in having this issue resolved prior to November 17, 2008.

[11] *See* Exhibit 3: Affidavit of GP (the executed Affidavit, which counsel is in the process of obtaining, will be filed with the Clerk and presented to the Court prior to the hearing of this Motion).

[12] *See* Exhibit 4: Documents concerning GP that were submitted by the Secretary at the *ex parte* September 18, 2008 hearing.

Additionally, as recognized by the Court in its October 16, 2008 Opinion and Order, any attempt to prohibit GP's ability to advertise for Internet gambling operations that are legally operating in their country of origin, constitutes a prior restraint on speech in violation of the First Amendment,[13] which has extended protection to commercial speech and gambling advertising such as that contained on GP's website.[14] The Supreme Court has stated that "the power to prohibit or to regulate particular conduct does not necessarily include the power to prohibit or regulate speech about that conduct."[15] Thus, any attempt to hold that advertising of Internet gambling facilities is criminal activity, would constitute a dangerous First Amendment precedent,[16] which this Court has noted it is not willing to set.

Indeed, in its October 16, 2008 Opinion and Order, the Court stated that "maintenance of a website or Internet advertisement alone, without more, is not enough to constitute presence for purposes of state court jurisdiction analysis."[17] As a result, the Court stated "the Court's [September 18, 2008] Seizure Order should be withdrawn as to [goldenpalace.com], who "is limited to maintaining [a] website and providing advertisement for third-party gambling websites."[18] Accordingly, because it cannot be disputed that GP does not accept U.S. play for money, GP respectfully requests this

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[13] *R.A.V. v. City of St. Paul*, 505 U.S. 377 (1992).

[14] *Greater New Orleans Broadcasting Assn. v. U.S.*, 527 U.S. 173 (1999).

[15] *Id.* at 193.

[16] *Id.*

[17] *See* Court's October 16, 2008 Opinion and Order.

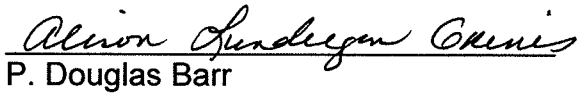
[18] *Id.*

Court relieve it of the September 18, 2008 Seizure Order as amended and dismiss it from the above-captioned matter.[19]

IV. CONCLUSION

Pursuant to the Court's October 16, 2008 Opinion and Order, GP, respectfully requests this Court relieve GP of the Court's September 18, 2008 Seizure Order and dismiss it from the above-captioned matter.

Respectfully submitted,

By: 

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Counsel for the Registrant of Goldenpalace.com

[19] In response to IGC and the Group of 5 Domain Defendants' Motion for Stay, GP respectfully requests any such stay, should it be awarded, not apply to those Domain Defendants such as GP, whom the Court has identified as being outside the scope of its September 18, 2008 Seizure Order.

CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of the foregoing has been served this 21st day of October 2008, upon the following:

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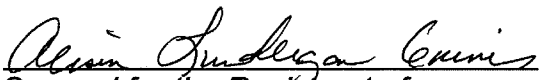
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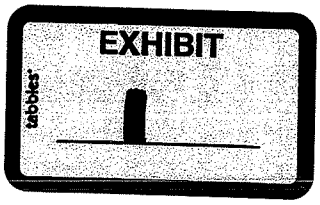
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October 17, 2008

VIA FACSIMILE & EMAIL
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Re: *Commonwealth v. 151 Domain Names*, Franklin Circuit Court
Civil Action No. 08-CI-1409

Gentlemen,

On behalf of our client, the registrant for goldenpalace.com, we write to request that the Commonwealth enter into an Agreed Order of Dismissal regarding goldenpalace.com in the above-captioned matter.

In its October 16, 2008 Opinion and Order, the Court held that "maintenance of a website or Internet advertisement alone, without more, is not enough to constitute presence for purposes of state court jurisdiction analysis." Thus, the Court stated that because "goldenpalace.com is limited to maintaining [a] website and providing advertisement for third-party gambling websites...the Court's [September 18, 2008] seizure order should be withdrawn as to [goldenpalace.com]."

Additionally, as demonstrated by the evidence submitted to the Court by the Commonwealth at the September 18, 2008 hearing, goldenpalace.com does not offer U.S. play for money, but rather, as noted by the Court above, only advertises for third-party gambling websites. Accordingly, goldenpalace.com hereby intends to seek dismissal from the above-captioned matter based upon the Court's October 16, 2008

Opinion and Order. We believe it would be consistent with the Opinion and Order for the parties to submit an Agreed Order of Dismissal to the Court with respect to goldenpalace.com. Should the Commonwealth be amenable to entering into such an Order, please let us know on or before noon on Monday, October 20, 2008, and we will circulate a draft Agreed Order of Dismissal for your review. If the Commonwealth does not wish to enter into such an Agreed Order, we will file an appropriate motion with the Court.

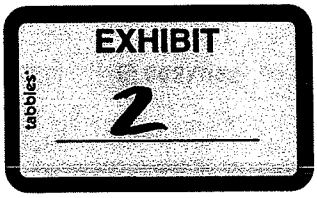
We look forward to working with you to resolve this matter. In the meantime, should you have any questions, please let me know.

Very truly yours,

STOLL KEENON OGDEN PLLC

Alison Lundergan Grimes

Alison Lundergan Grimes



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VIA FACSIMILE (859) 253-1093 & U.S. MAIL

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Dear Ms. Grimes,

Thank you for your letter of October 17 2008. Your letter mistakenly suggests the Court made a determination goldenpalace.com merely maintains a website that only provides advertising for third party gambling websites. The Court did not make this determination but acknowledged that was your contention.

The Commonwealth respectfully disagrees that goldenpalace.com only provides advertisements for third party gambling websites. More importantly, the Court expressly stated the time to address this issue is at the November 17th forfeiture hearing wherein your client who claims an interest in the res is to appear. The Commonwealth does not believe there is any basis for you to file a motion that would ignore the Court's ruling in this regard. Accordingly, we look forward to your client's appearance at the November 17th hearing.

Additionally, the Court also ordered you to provide the names and identities of the party or parties who retained you as well as a description of the nature of your client's interests as it relates to goldencasino.com and goldenpalace.com. Please let us know when we can expect your compliance with the Court's Order.

Yours truly,

Robert M. Foote

RMF/nn



COMMONWEALTH OF KENTUCKY
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COMMONWEALTH OF KENTUCKY
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141 INTERNET DOMAIN NAMES — DEFENDANTS

AFFIDAVIT OF RICHARD ROWE

Comes the Affiant, Richard Rowe, and after having first been duly sworn, states as follows:

1. I am a Director of Universal Spheres Inc. and have served in that capacity since November 28, 2005.

2. Universal Spheres Inc., which is not located in the U.S., serves as the Registrant of the domain name goldenpalace.com ("GP").

3. Network Solutions, which is located in Virginia, serves as GP's registrar.

4. In regards to U.S. residents, GP is (and was at the time of the Court's September 18, 2008 Seizure Order) a non-gambling website, meaning GP does not offer and/or accept U.S. play for money by U.S. residents.

Further, the Affiant sayeth naught.

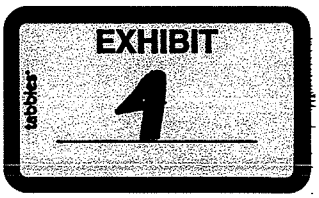
_____
RICHARD ROWE

STATE OF _____)
)
COUNTY OF_____)

Subscribed and sworn to before me by _____this the ___ day of October, 2008.

My commission expires: _____

_____
NOTARY PUBLIC



GAMBLED & PROMOTED DOMAIN NAMES		
DOMAIN NAME	ACTION	REGISTRARS
goldencasino.com	Gambled	Domain Name: GOLDENCASINO.COM Registrar: DIRECTI INTERNET SOLUTIONS PVT. LTD. D/B/A PUBLICDOMAINREGISTRY.COM Whois Server: whois.PublicDomainRegistry.com Referral URL: http://www.PublicDomainRegistry.com Name Server: NS1.SURF4SPEED.COM Name Server: NS2.SURF4SPEED.COM Status: ok Updated Date: 09-apr-2008 Creation Date: 27-oct-1997 Expiration Date: 18-nov-2010
goldgatecasino.com	Gambled	Domain Name: GOLDGATECASINO.COM Registrar: DOTSTER, INC. Whois Server: whois.dotster.com Referral URL: http://www.dotster.com Name Server: PDNS1.ULTRADNS.NET Name Server: PDNS2.ULTRADNS.NET Name Server: PDNS3.ULTRADNS.ORG Name Server: PDNS4.ULTRADNS.ORG Name Server: PDNS5.ULTRADNS.INFO Name Server: PDNS6.ULTRADNS.CO.UK Status: clientDeleteProhibited Status: clientTransferProhibited Status: clientUpdateProhibited Updated Date: 25-apr-2005 Creation Date: 03-dec-2000 Expiration Date: 31-dec-2008
goldenpalace.com	Promoted	Domain Name: GOLDENPALACE.COM Registrar: NETWORK SOLUTIONS, LLC. Whois Server: whois.networksolutions.com Referral URL: http://www.networksolutions.com Name Server: NS.BAMBLES.COM Name Server: NS1.BAMBLES.COM Status: clientTransferProhibited Updated Date: 03-feb-2008 Creation Date: 23-dec-1998 Expiration Date: 23-dec-2009

Greg Howard & Associates
Consulting Firm
Lexington, KY

Evidence Collection

Case Name: Illegal Online Gambling in KY
Date: June 30, 2008
Time: 1656
Location: 1010 Monarch Street
Suite 250
Lexington, KY 40513

Domain Name: www. golden palace .com ✓ .net ___ .org ___ .us ___ Other ___
Website: Golden Palace
Gambling Software: _____
Payment Solution: _____

Video Recording: Yes ✓ No ___

Observer: Frank P. Kubala, Jr. Bill Watts
Observer Notes:
doesn't log in

Greg Howard & Associates
Consulting Firm
Lexington, KY

Evidence Collection

Case Name: Illegal Online Gambling in KY
Date: ~~July~~ June 3, 2008
Time: 11:55
Location: 1010 Monarch Street
Suite 250
Lexington, KY 40513

Domain Name: www.GoldenPalace~~.com~~ Off .com ✓ .net ___ .org ___ .us ___ Other ___
Website: GOLDEN PALACE . COM CASINO + POKER - LINKED TO GOLDEN CASINO.COM
Gambling Software: YES
Payment Solution: 4172 0900 0020 4284 $20.00
TRANS # 121510097214ITBSM
Video Recording: Yes ✓ No ___

Observer: John Schwartz
Observer Notes:
PW: rr882878 ACCT # GPD590188722
DEUCES WILD VIDEO POKER

SUCCESSFUL