

February 2, 2026  
OIA/PA Mail Referral Unit  
Department of Justice  
Room 115  
LOC Building  
Washington, DC 20530-0001

RE: FOIA / Privacy Act Request - USAO-SDNY records relating to Chad Elie / PokerStars; Jeff Ifrah; Attorney Goldstein / Goldstein firm; "bank fraud / poker processing" dinner-letter and retraction; AUSA Arlo Devlin-Brown; Caesars Interactive; Harry Reid; John Ashcroft legal opinions

To the FOIA/Privacy Act Officer:

This is a request under the Freedom of Information Act, 5 U.S.C. § 552, and the Privacy Act, 5 U.S.C. § 552a (to the extent applicable), for records maintained by EOUSA and/or any U.S. Attorney's Office(s), including the U.S. Attorney's Office for the Southern District of New York

(USAO-SDNY), relating to the matters described below. If this referral unit determines that responsive records are held by another DOJ component, please forward this request accordingly.

REQUESTER INFORMATION (FIRST-PARTY)

Name: Chad Elie  
DOB: [REDACTED]  
Place of Birth: [REDACTED]  
Current Address: [REDACTED]  
Email: [REDACTED]  
Phone: [REDACTED]

IDENTITY VERIFICATION (for records about myself)

I declare under penalty of perjury that I am the individual named above and that the information provided is true and correct.

Executed on: 2.2.2026 Signature: \_\_\_\_\_

CASE IDENTIFIERS

Court: U.S. District Court for the Southern District of New York  
Caption / Case Name: United States v. Scheinberg et al. (Criminal Case); United States v. PokerStars et al. (Civil Forfeiture Case)  
Docket Number: 1:10-cr-00336-LAK (Criminal); 1:11-cv-02564-LBS (Civil)

Approx. Dates: 2010-2012 (with investigations dating back to 2006 or earlier; sentencing in 2012)

BACKGROUND / SCOPE

This request concerns records relating to the investigation(s) and prosecution(s) connected to PokerStars and/or online poker/payment processing matters in which I (Chad Elie) was a defendant or subject, including records involving or referencing my former attorney Jeff Ifrah and

related charging, plea, cooperation, compliance, and prosecutorial decision-making. This includes matters related to the "Black Friday" indictments on April 15, 2011, involving payment processors for PokerStars, Full Tilt Poker, and Absolute Poker.

As part of discovery previously produced to me from USAO-SDNY, I received FBI FD-302 materials, including references to proffer/debriefing sessions involving Jeff Ifrah. I am submitting

this FOIA/Privacy Act request to obtain all responsive USAO/EOUSA records formally, including records not included in prior discovery productions and any versions/attachments not previously provided. This request is intended to be comprehensive and seeks to uncover any internal deliberations, communications, or documents that may shed light on potential conflicts, policy shifts, or external influences on the case, including any roles played by banks like SunFirst Bank

in processing transactions.

DEFINITIONS

1. "Records" includes, without limitation: letters, emails, attachments, drafts, memoranda, notes, calendar entries, meeting invitations, phone logs, text messages or messages on official systems, internal correspondence, case management entries (including LIONS and any successor systems), audio or video recordings, investigative reports, and any metadata.
2. "Attorney/Firm" (previously referred to as "Goldstein") means any attorney (including but

not limited to Goldstein, Andrew Goldstein, Andrew D. Goldstein, Marc Zwillinger, or any former DOJ official from computer crimes/internet gambling enforcement units) and/or their law firm/office (including any staff acting on its behalf, such as ZwillGen PLLC or similar).

3. "Chief of SDNY" means the U.S. Attorney for SDNY and/or any SDNY official described internally as "Chief," including division chiefs or supervisors, for the relevant time period (including but not limited to Preet Bharara).

#### RECORDS REQUESTED

Please search for and produce all records in EOUSA/USAO-SDNY possession, custody, or control that relate to any of the following categories (limited to the PokerStars / online poker /

payment processing investigative and prosecutorial matters and any directly related files, including the "Black Friday" cases):

A) ATTORNEY/FIRM "DINNER" + LETTER MEMORIALIZING "BANK FRAUD / POKER PROCESSING" THRESHOLD + RETRACTION

1. All records concerning any dinner meeting (or meeting/meal) between any SDNY "Chief" (as defined above) and any Attorney/Firm (as defined above), including:

- Scheduling communications, invitations, attendee lists, calendar entries, locations/venues, and follow-up communications
- Any notes, summaries, memoranda, or internal communications memorializing the meeting's content

2. All records (including drafts) of any letter, email, memorandum, or written communication from any SDNY "Chief" (or SDNY personnel) to any Attorney/Firm that memorialized or stated, in substance, that SDNY would not prosecute persons absent "bank fraud" relating to poker processing (or language substantially similar), including:

- The original communication and all drafts/attachments
- Any internal routing/approval emails
- Any communications about whether/how the letter could be used, quoted, or shared

3. All records of any retraction, withdrawal, correction, or "retraction directive" concerning that letter/communication, including:

- The retraction letter or notice (and drafts)
- Any communications directing the Attorney/Firm to retract or withdraw the letter/statement
- Any communications discussing why the retraction occurred and who authorized it
- Any record reflecting distribution of the retraction (including whether it was sent to Chad Elie or his counsel)

B) COMMUNICATIONS WITH / ABOUT AUSA ARLO DEVLIN-BROWN

4) All communications between USAO-SDNY and AUSA Arlo Devlin-Brown (including supervisors, leadership, or other AUSAs) concerning:

- The Attorney/Firm dinner/letter/retraction issues described above
- Any charging thresholds, charging policies, or prosecutorial strategy relating to poker/payment processing matters
- Any discussions about using or referencing the letter in plea negotiations or case strategy

C) JEFF IFRAH - PROFFERS / COOPERATION / CONFLICTS / DECLINATION DECISIONS / COMMUNICATIONS SENT TO SDNY

5) All records concerning Jeff Ifrah (a/k/a Jeffrey Ifrah; Ifrah Law), including:

- Any proffer/debriefing/cooperation sessions involving him
- Any internal communications concerning conflicts of interest arising from his representation of Chad Elie and/or PokerStars
- Any discussions of whether he was treated as a cooperator, source, witness, or otherwise assisting the government
- Any discussions of charging, non-prosecution, declination, immunity, or decisions not to indict
- Any and all communications (including emails, letters, submissions, attachments, or other materials) sent by Jeff Ifrah (or on his behalf, including from Ifrah Law or related entities) to USAO-SDNY (or any SDNY personnel) regarding any party, entity, or individual related to the indictment(s), investigation(s), or prosecution(s) in the PokerStars / online poker / payment processing matters (including but not limited to

Chad Elie, PokerStars, Full Tilt Poker, Absolute Poker, SunFirst Bank, or other defendants/subjects such as Isai Scheinberg, Bradley Franzen, Ira Rubin, Ryan Lang, or John Campos)

- Any records referencing or discussing the lawsuit Chad Elie v. Jeff Ifrah (Clark County District Court, Nevada, approx. 2013-2014), including any internal analysis of its implications for the SDNY case, conflicts, or legal opinions

D) PLEA / COOPERATION DISCUSSIONS INVOLVING REQUESTS FOR INFORMATION ABOUT JEFF IFRAH

6) All records reflecting any plea/cooperation discussions in which I (Chad Elie) or my counsel were asked to provide information about Jeff Ifrah in exchange for sentencing consideration (including any downward departure discussions), including any notes, emails, letters, draft agreements, internal memos, or communications memorializing those discussions.

E) COMPLIANCE / ETHICS / "CORRUPTION OR CONFLICT" EFFECT ON CHARGING AND CASE INTEGRITY

7) All records reflecting internal discussion, analysis, or concerns regarding:

- Compliance issues, charging theories, or appropriateness of charging Chad Elie in light of any cooperation/assistance provided by his attorney or counsel

- Any analysis of the effect of counsel conflicts, informant/cooperator issues, or privilege/ethical concerns on the investigation, evidence, plea, or sentencing

F) LEGAL OPINIONS PROVIDED TO SDNY (INCLUDING JOHN ASHCROFT)

8) All records consisting of, attaching, transmitting, quoting, summarizing, or discussing any legal opinions, white papers, memoranda, compliance analyses, or legal argument materials that were voluntarily provided by Chad Elie and/or on Chad Elie's behalf to USAO-SDNY (or any SDNY personnel) regarding online poker, payment processing, bank fraud theories, UIGEA, or related legal issues, including:

- Any opinion letters or legal materials authored by, attributed to, transmitted by, or referencing John Ashcroft, "The Ashcroft Group," or related counsel/affiliates

- All cover emails, attachments, and internal forwarding/distribution

- Any internal commentary, evaluation, or discussion of those legal opinions

G) CAESARS INTERACTIVE / HARRY REID

9) All records referencing or involving Caesars Interactive (including variants such as Caesars Interactive Entertainment) and/or former Senator Harry Reid in connection with the PokerStars / online poker / payment processing investigation(s) and prosecution(s) connected to my case, including any communications about lobbying, policy influence, or UIGEA enforcement changes.

H) ETHICS / OVERSIGHT INVESTIGATIONS (OIG / OPR)

10) All records from the DOJ Office of Inspector General (OIG) or Office of Professional Responsibility (OPR) concerning investigations, reviews, or inquiries into ethics, conflicts of interest, prosecutorial discretion, or policy shifts in the PokerStars / online poker / payment processing cases, including any related to Jeff Ifrah, the Attorney/Firm letter/retraction, or charging thresholds for bank fraud.

I) REPUTATIONAL RISK AND CHARGING THEORIES WITHOUT BANK LOSSES

11) All records reflecting internal discussions, analyses, memoranda, or concerns regarding:  
- The use of "reputational risk" (or similar concepts such as reputation risk, regulatory risk,

potential harm to banks' reputation, or non-monetary harm) as a basis or justification for pursuing felony bank fraud charges under 18 U.S.C. § 1344 or related statutes

- Prosecutorial strategies or theories for charging felony bank fraud in cases where no banks suffered actual monetary losses, including how deception in payment processing (e.g., mis-coding transactions) was deemed sufficient to establish fraud without direct financial harm to banks

- Any evaluations of whether actual loss to banks was required for charges, or if potential risks (including reputational) sufficed, specifically in the context of UIGEA enforcement and online poker/payment processing matters

SEARCH LOCATIONS / TERMS

Please search all systems and locations reasonably likely to contain responsive records, including email archives, shared drives, backup systems, and case management systems (including LIONS and any successor systems), using terms including:

"Chad Elie," "PokerStars," "Ifrah," "Jeff Ifrah," "Jeffrey Ifrah," "Ifrah Law," "Ifrah PLLC," "ifrahlaw.com," "Goldstein," "[Goldstein firm name if known]," "Andrew Goldstein," "Andrew D. Goldstein," "Preet Bharara," "Niketh Velamoor," "Nicole Friedlander," "Bharara," "Velamoor," "Friedlander," "Zwillinger," "Marc Zwillinger," "ZwillGen," "computer crimes," "internet gambling

enforcement," "dinner," "bank fraud," "poker processing," "retraction," "withdraw," "Arlo Brown,"  
"Arlo Devlin-Brown," "Caesars Interactive," "Harry Reid," "Ashcroft," "John Ashcroft,"  
"Ashcroft  
Group," "legal opinion," "opinion letter," "compliance memorandum," "UIGEA," "Black Friday,"  
"Scheinberg," "payment processing," "SunFirst Bank," "SunFirst," "Utah bank," "payment  
processor fraud," "UIGEA enforcement," "poker indictment," "third-party processing," "Full Tilt  
Poker," "Absolute Poker," "Bradley Franzen," "Ira Rubin," "Ryan Lang," "John Campos,"  
"FD-302/302," "reputational risk," "reputation risk," "bank loss," "no loss," "no monetary  
loss,"

"felony without loss," "charging theory," "bank fraud theory," "non-monetary harm," and  
"regulatory risk."

#### DATE RANGE

If you cannot determine a narrower range, please search from January 1, 2006 through  
December 31, 2021 (or earliest-to-latest responsive records).

#### FORMAT

Please provide all records electronically (OCR-searchable PDF preferred) with metadata where  
available. If electronic production is not feasible, please provide paper copies.

#### FEES / FEE WAIVER

I request a waiver of all fees because disclosure is in the public interest and is likely to  
contribute significantly to public understanding of government operations, including  
prosecutorial

decision-making, UIGEA enforcement practices, and potential conflicts or overreach in  
high-profile cases. If fees are not waived, please notify me before incurring costs exceeding  
\$5,000.

#### SEGREGABILITY / WITHHOLDINGS

If any record is withheld in whole or in part, please identify the FOIA exemption(s) relied  
upon

and release all reasonably segregable non-exempt portions. If feasible, please provide a  
Vaughn index or equivalent explanation sufficient to understand the basis for each withholding.

#### REFERRALS

If responsive records are determined to be held by another DOJ component or office (including  
administrative/ethics/expense records, OIG, or OPR), please refer/route the request as  
appropriate or advise me where to submit.

Please provide a tracking number.

Sincerely,

Chad E. Elie Sr.