

1 Marc J. Randazza, SBN 269535  
Alex J. Shepard, SBN 295058  
2 RANDAZZA LEGAL GROUP, PLLC  
2764 Lake Sahara Drive Suite 109  
3 Las Vegas, NV 89117  
4 Telephone: (702) 420-2001  
Email: ecf@randazza.com

5 *Attorneys for Defendant,*  
6 *Veronica Brill*

**FILED/ENDORSED**  
**JAN 13 2021**  
By: E. Medina  
Deputy Clerk

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **FOR THE COUNTY OF SACRAMENTO**

9 **Michael Postle, an individual;**  
10  
11 **Plaintiff,**

12 vs.

13 **Veronica Brill, an individual; ESPN, Inc., a**  
14 **Delaware Corporation; Joey Ingram, an individual;**  
15 **Haralabos Voulgaris, an individual; Daniel**  
16 **Negreanu, an individual; Upswing Poker, Inc., a**  
17 **Nevada Corporation; iBus Media Limited d/b/a**  
18 **“PokerNews”, and Isle of Man, United Kingdom**  
19 **Private Limited Liability Company Parent; Jonathan**  
20 **Little Holdings LLC, d/b/a “Poker Coaching”,**  
21 **a Nevada Limited Liability Company; Solve For**  
22 **Why Academy LLC, a Nevada Limited Liability**  
23 **Company; Todd Witteles, an individual; Run It**  
24 **Once, Inc., a Nevada Corporation; and DOES 1**  
25 **through 1,000, inclusive;**

26 **Defendants.**

Case No. 34-2020-00286265

**DEFENDANT VERONICA BRILL'S**  
**NOTICE OF MOTION AND ANTI-**  
**SLAPP SPECIAL MOTION TO**  
**STRIKE COMPLAINT UNDER Cal.**  
**CODE CIV. PROC. § 425.16**

Judge: Richard K. Sueyoshi  
Dept: 53  
Date: February 11, 2021  
Time: 1:30 p.m.  
Reservation No. 2545114

Action Filed: 10/01/2020  
Trial Date: Not yet set

BY FAX

1 **TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD PLEASE TAKE**  
 2 **NOTICE THAT:**

3 On February 11, 2021 at 1:30 p.m. in the courtroom of the Honorable Judge Richard K.  
 4 Sueyoshi, Defendant Veronica Brill will and hereby does move to strike Plaintiff Michael Postle's  
 5 Complaint under California Code of Civil Procedure § 425.16, and seeks the pending action's  
 6 dismissal, as well as costs and reasonable attorneys' fees.

7 Brill seeks dismissal of the Complaint under this statute because (1) the conduct alleged in the  
 8 Complaint was done in furtherance of Brill's right of petition or free speech, (2) Brill's speech was  
 9 connected to an issue of public interest, and (3) Plaintiff does not have a likelihood of prevailing on  
 10 his claims. Brill made statements on the social media website Twitter notifying people of her expert  
 11 opinion that Plaintiff was cheating in a professional poker game being broadcast to thousands of  
 12 viewers. In this context, Plaintiff was a public figure. The statements that form the basis of Plaintiff's  
 13 complaint were either true, substantially true, statements of opinion or rhetorical hyperbole, or were  
 14 made without actual malice.

15 This Motion is based on this Notice; the accompanying Memorandum of Points and  
 16 Authorities; the declarations and exhibits thereto; and such other authorities and argument as may be  
 17 submitted in any reply at or before the hearing.

18 Dated: January 6, 2021.

Respectfully Submitted,



19  
 20  
 21 Marc J. Randazza  
 22 Alex J. Shepard  
 RANDAZZA LEGAL GROUP, PLLC

23 *Attorneys for Defendant*  
 24 *Veronica Brill*

25  
 26  
 27

**MEMORANDUM OF POINTS AND AUTHORITIES**

**1.0 INTRODUCTION**

Plaintiff is a professional poker player who many believe cheated during poker games run by a particular company. His play was erratic, irrational, and led to mathematically impossible results. Defendant Brill informed Plaintiff's favored gaming host of her suspicions. Seeing no action taken, Brill had no choice but to inform the professional poker community to bring some accountability back to the game. She expressed her opinion publicly and provided the factual bases for her statements. Other players, viewers, and commentators found her observations valid and further investigated.

More than a year after Brill made her statements, Plaintiff sought to punish Brill for calling out the apparent cheating. This is a SLAPP<sup>1</sup> suit meant to silence her and other critics. Plaintiff, a public figure, cannot prove that Brill's statements are actionable and cannot prove that she made any statement with actual malice. All of his non-defamation claims are duplicative and must be dismissed for the same reasons his defamation claims fail. Because his causes of action are based on Brill's statements made in connection with an issue of public interest, the Court should dismiss all of his claims with prejudice and award Brill her costs and reasonable attorneys' fees incurred in connection with this motion under Cal. Code Civ. Proc. § 425.16.

**2.0 FACTUAL BACKGROUND**

**2.1 Plaintiff's Status as a Public Figure**

Plaintiff "is a professional poker player who has made a full-time career out of playing poker. Poker has been Plaintiff's primary source of income since April 2003." (Complaint at ¶ 19.) Postle claims he is known for his playing style. (Complaint at ¶ 22.) He alleges that, within 14 months, he "played approximately four hundred (400) hours, consisting of approximately eight thousand (8,000) hands of poker ...." (Complaint at ¶ 26.)

Plaintiff's career began to take off in June 2018 when Stones Gambling Hall ("Stones Hall"), a professional gambling company that arranged and broadcast professional poker games, took a

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<sup>1</sup> SLAPP is an acronym for "Strategic Lawsuit Against Public Participation."

1 particular interest in him. Stones Hall live streams poker and broadcasts them over the internet.  
2 (Complaint at ¶ 20.) Plaintiff played in Stones Live games until September 21, 2019. (*Id.*)

3 Stones Hall's "broadcast team did its best to turn him into a poker celebrity. They created a  
4 series of graphics designed to hype his talents," including showing "Postle's face superimposed over  
5 that of Jesus." (*See* Brendan I Koerner, "The Cheating Scandal That Ripped the Poker World Apart,"  
6 WIRED (Sept. 21, 2020) (last accessed Jan. 5, 2021), attached as **Exhibit 1**.)<sup>2</sup> Leading up to the  
7 September 2019 Stones Hall game, Plaintiff "was in the midst of an epic winning streak – a 'heater' –  
8 that had turned him into a local folk hero. He'd become such a force on Stones' livestream, in fact,  
9 that casino regulars had taken to calling him the Messiah and even God." (*Id.*) Indeed, in an interview  
10 of Plaintiff by Justin Kuraitis, the Stones Hall employee "in charge of the live-stream production of  
11 Stones Live at Stones Hall" (Complaint at ¶ 33), Kuraitis said to Plaintiff, "I mean, who wouldn't want  
12 to know the thought process of a poker player that is running like a freaking god. They nicknamed  
13 you in previous streams 'Mike Jesus Postle,' 'G.O.D.', it's like – I think it's the other way, I think you  
14 may have sold your soul to the devil." (Declaration of Heather Ebert ["Ebert Decl."], attached as  
15 **Exhibit 2**, at ¶ 6; *see also* "Mike Postle Interview with Justin Kuraitis 1-23-2019" (Jan. 4, 2019), also  
16 attached as **Exhibit 3**.)<sup>3</sup>

17 Other players noted his unusual win streak as well. Jaman Burton posted a video on YouTube  
18 in November 2018 discussing a Stones Live game in which he played against Postle. (*See* screenshot  
19 of "Avoid Mike Postle: Crazy 1/3 No-Limit game at Stones Gambling Hall" (Nov. 26, 2018), attached  
20 as **Exhibit 4**.)<sup>4</sup> Burton's YouTube account has 35,000 subscribers, and this video garnered over  
21 120,000 views. (*Id.*) In June 2019, Jonathan Little of Defendant Poker Coaching published a video  
22 on his YouTube account discussing unusual and unnecessarily risky play by Postle during a Stones  
23 Live game. (*See* screenshot of "God Mode (or Cheating?) by Mike Postle in a \$5/\$10 Cash Game"

24  
25 <sup>2</sup> Available at: <https://www.wired.com/story/stones-poker-cheating-scandal/> (last accessed  
Jan. 5, 2021).

26 <sup>3</sup> Available at: [https://www.youtube.com/watch?v=uuWuc4hHT-w\\_](https://www.youtube.com/watch?v=uuWuc4hHT-w_) (last accessed Jan. 5,  
2021).

27 <sup>4</sup> Available at: <https://www.youtube.com/watch?v=9L6DueV9aHc> (last accessed Jan. 5, 2021).

1 (June 6, 2019), attached as **Exhibit 5.**<sup>5</sup> Little’s YouTube account has over 71,000 subscribers and  
 2 this video garnered about 90,000 views. (*Id.*) By September 21, 2019, Plaintiff was a public figure.

3 **2.2 Brill’s Suspicions that Plaintiff Was Cheating**

4 Defendant Veronica Brill regularly hosted Stones Live games. (Declaration of Veronica Brill  
 5 [“Brill Decl.”], attached as **Exhibit 6** at ¶ 3. Brill saw Postle’s win percentages as a mathematical  
 6 anomaly. This is because his play style was not compatible with game theory optimal (“GTO”), the  
 7 prevailing theory of play among professional poker players. (*Id.* at ¶¶ 5, 8.) GTO states that, for each  
 8 scenario in a poker game, there is a decision that will maximize a player’s winnings over time. (*Id.* at  
 9 ¶ 5.) Due to poker’s randomness, a player utilizing GTO perfectly could still lose an individual game,  
 10 but on average is likely to turn a profit. (*Id.* at ¶ 6.) GTO requires hundreds of hours of study and  
 11 practice of all possible hand combinations and which play is best at any given time. (*Id.* at ¶ 7.)  
 12 Plaintiff did not employ GTO; he made decisions that appeared capricious, risky, and made little sense  
 13 when viewed through a statistical lens. (*Id.* at ¶ 8.)

14 From July 2018 to September 2019, Plaintiff had net winnings in 94% of Stones Live games.  
 15 This statistic would make Plaintiff one of the best poker players of all time. (Brill Decl. at ¶¶ 9-11.)  
 16 Plaintiff’s success in any individual game could be luck or skill, but not such consistent success over  
 17 more than a year. (*Id.* at ¶ 12.) The narrative of a relatively obscure poker player suddenly earning a  
 18 name for himself is appealing. But after enough inexplicable play resulting in Plaintiff winning, Brill  
 19 began to suspect that Plaintiff may have had more information than his competitors.

20 Stones Live games are broadcast on a 30-minute delay. (Complaint at ¶ 21.) Stones Hall uses  
 21 RFID tech to keep track of all players’ cards, and broadcast this information as part of its stream.  
 22 (Brill Decl. at ¶ 13.) The 30-minute delay prevents viewers from sharing the info with players. Stones  
 23 Hall, however, has all this information in real time, and *could* transmit this to third parties. (*Id.* at ¶ 14.)  
 24 This is why Brill began to suspect Plaintiff of cheating. He regularly brought his phone to Stones Live  
 25 games and would shield his phone on his lap, while watching it. (*Id.* at ¶ 15.) Brill noticed that Plaintiff

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26 <sup>5</sup> Available at: [https://www.youtube.com/watch?v=-hPmOpd\\_wBs](https://www.youtube.com/watch?v=-hPmOpd_wBs) (last accessed Jan. 5,  
 27 2021).

1 almost never continued playing after a broadcast ended and he rarely played in games not hosted by  
 2 Stones Hall. (*Id.* at ¶ 16.) Considering this suspicious behavior and the inexplicable nature of  
 3 Plaintiff's success with sub-optimal play, Brill concluded there was a chance that someone in Stones  
 4 Hall was providing Plaintiff with a non-delayed stream of Stones Live games, allowing him to see the  
 5 cards other players had in their hand, giving him an unfair advantage, i.e., cheating. (*Id.* at ¶ 17.)  
 6 Plaintiff did not do as well in games where he was not regularly looking at his phone. (*Id.* at ¶ 18.)

7 In March 2019, Brill spoke to Kuraitis about her suspicions. (*Id.* at ¶ 19.) Other professional  
 8 players also thought Plaintiff was cheating. (*Id.* at ¶¶ 20-23.) Stones Hall claims it investigated these  
 9 complaints and that it believed Plaintiff was not cheating. (*Id.* at ¶ 24.) This did not settle the matter  
 10 for Brill, as she suspected that Stones Hall itself was complicit. (*Id.* at ¶ 25.) The apparent cheating  
 11 continued unabated. Immediately after a May 2019 game, Plaintiff made it clear that he was aware of  
 12 a technical glitch during the game broadcast. He could not have known this unless he had access to  
 13 the real time feed – confirming Brill's suspicions. (*Id.* at ¶¶ 26-27.)

14 During a September 21, 2019 Stones Live game Plaintiff continued to stare at his phone while  
 15 shielding it from others,<sup>6</sup> and continued to make decisions that defied all conventional wisdom. (*Id.*  
 16 at ¶ 30.) Brill was convinced that Plaintiff cheated, and that Stones Hall would do nothing to stop  
 17 him, meaning the only way to stop the cheating was to go public. (*Id.* at ¶ 31.)

18 **2.3 Brill's Statements**

19 On September 28, 2019, Brill published 9 tweets on Twitter, all in the same thread. The tweets  
 20 are as follows:

21 If someone is displaying a probability of cheating on a live stream you don't make the  
 22 entire room not be able to use their cellphones in an attempt to reduce everyone's  
 anxiety and then still promote the player as one of the best.

23 You take that player off the stream while you launch a proper, objective, investigation  
 24 done by a third-party. Once it's shown that the player has not been cheating you make  
 your investigation public and let the player back onto the stream.

26 \_\_\_\_\_  
 27 <sup>6</sup> Plaintiff admits that he looked at his phone during this game and placed it between his legs.  
 (Complaint at ¶ 23.)

1 **Am I sure that this player is cheating? No.** Do I think that there is a greater than  
 2 zero % chance that he is? Yes. Have numerous professional poker players voiced  
 their concerns to me regarding this player? Yes.

3 Also, I brought up my concerns about this player months ago to the person running  
 4 the live stream. I was told that no one gets this player and that he is just better than  
 everyone. Also that they had some one or some company come in to check their  
 5 security.

6 Apparently that didn't help because no one is allowed to have a cellphone while playing  
 7 even off stream. The thing is that it doesn't take a cell phone to cheat. There could  
 easily be a small device on his leg that lets him know when he's ahead. **I'm just  
 8 speculating at this point.**

9 I want to say that off stream he's a nice guy and has always played [sic] in my game.  
 10 I wanted to take him off my line up last year because of suspicions but was assured by  
 the guy running the stream that he wasn't cheating. **All the videos are up. You can  
 11 decide for yourself.**

12 I feel that with such a high vpip and play style, if we run the SIM a hundred times with  
 13 players of equal competency he's running in the 95<sup>th</sup> percentile of results.

14 (Sept. 28, 2019 Twitter thread, attached to Brill Decl. as **Exhibit A**) (emphasis added.) The last two  
 15 are links to Stones Live games where Plaintiff played.<sup>7</sup> Plaintiff admits that he first became aware of  
 16 Brill's statements on Sept. 28, 2019. (Complaint at ¶ 20.) Plaintiff also alleges Brill subsequently made  
 17 other statements such as "He's cheating" and "Mike Postle is a cheat," but he does not identify where  
 or when such statements were allegedly made, and so it is impossible to determine the context of such  
 18 statements. (Complaint at ¶ 39.)

19 **3.0 LEGAL STANDARD**

20 Anti-SLAPP statutes are meant to provide courts with a mechanism to "eliminate meritless  
 21 or retaliatory litigation at an early stage of the proceedings." (*Seelig v. Infinity Broad. Corp.* (2002) 97  
 22 Cal. App. 4th 798, 806). In analyzing the merits of a plaintiff's claim, courts use "a summary-  
 judgment-like procedure." (*Wallace v. McCubbin* (2011) 196 Cal. App. 4th 1169, 1180-81).

23 An Anti-SLAPP motion is evaluated in two steps. First, the defendant must show that her  
 24 alleged actions were made in furtherance of her right to petition or free speech in connection with a  
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26 <sup>7</sup> See "Mike Postle on Stones Live" (available at: [https://www.youtube.com/  
 27 watch?v=pH8Fjro2oJs&feature=emb\\_logo](https://www.youtube.com/watch?v=pH8Fjro2oJs&feature=emb_logo)); see also "Battle of the Ace Highs fo \$8k+ 3/14/19"  
 (available at: <https://www.youtube.com/watch?v=BATKzg3Wu0I&feature=youtu.be>).

1 public issue. (*See* Cal. Code Civ. Proc. § 425.16(b)). The burden then shifts to the plaintiff to  
 2 demonstrate a probability of prevailing on his claims.

3 **4.0 ARGUMENT**

4 **4.1 Plaintiff's Claims Arise from Brill's Protected Conduct**

5 Protected conduct includes "(3) any written or oral statement or writing made in a place open  
 6 to the public or a public forum in connection with an issue of public interest, or (4) any other conduct  
 7 in furtherance of the exercise of the constitutional right of petition or the constitutional right of free  
 8 speech in connection with a public issue or an issue of public interest." (*Id.* at § 425.16(e)(3)-(4)).

9 **4.1.1 Brill's Statements are in Connection with an Issue of Public Interest**

10 "Public interest" is broad,<sup>8</sup> and such an issue "need not be 'significant' to be protected by the  
 11 anti-SLAPP statute – it is enough that it is one in which the public takes an interest." (*Nygaard, Inc. v.*  
 12 *Uusi-Kerttula* (2008) 159 Cal. App. 4th 1027, 1042). An activity does not need to "meet the lofty  
 13 standard of pertaining to the heart of self-government" to qualify for Anti-SLAPP protection; "social  
 14 or even low-brow topics may suffice." (*Hilton v. Hallmark Cards* (9th Cir. 2009) 599 F.3d 894 905).

15 Speech is of public concern when it touches "on issues in which the public (even a small slice  
 16 of the public) might be interested." (*Pan Am Sys., Inc. v. Atl. Ne. Rails & Ports, Inc.* (1st Cir. 2015) 804  
 17 F.3d 59, 66). Such issues "are those that can be fairly considered as relating to any matter of political,  
 18 social, or other concerns to the community." (*Levinsky's, Inc. v. Wal-Mart Stores, Inc.*, (1st Cir. 1997)  
 19 127 F.3d 122, 132) (internal quotation omitted). And "the relevant community need not be very large  
 20 and the relevant concern need not be of paramount importance or national scope. Rather, "it is  
 21 sufficient that the speech concerns matters in which even a relatively small segment of the general  
 22 public might be interested.'" (*Id.*) (quoting *Roe v. City of San Francisco* (9th Cir. 1997) 109 F.3d 578,  
 23 585). For example, an internet discussion board regarding the movie "My Big Fat Greek Wedding"  
 24 was a matter of public interest. (*See Kronemyer v. Internet Movie Data Base, Inc.* (2007) 150 Cal. App. 4th  
 25 941, 949.) A fashion line was found to qualify as a matter of public interest among the "high fashion"

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26 <sup>8</sup> The statute explicitly provides that "[t]his section shall be construed broadly." (*See* Cal. Code  
 27 Civ. Proc. § 425.16(a)).



1 community. (*See Tierney v. Moschino S.p.A.* (C.D. Cal. Jan. 13, 2016) Case No. 2:15-cv-05900, Doc. 49).  
 2 Statements about a fantasy sport league were found to be of public interest due to the “widespread  
 3 public interest in ... fantasy sports.” (*Friedman v. DirecTV* (C.D. Cal. 2015) 262 F. Supp. 3d 1000,  
 4 1004). Even a gossip column is just as protected as political speech under the Anti-SLAPP statute.  
 5 (*See Hall v. Time Warner, Inc.* (2007) 153 Cal. App. 4th 1337, 1347 [an interview Marlon Brando’s  
 6 housekeeper named in his will was in connection with the public interest for purposes of Anti-SLAPP  
 7 statute].

8 The Supreme Court of Nevada, which has an Anti-SLAPP statute modeled on California’s,  
 9 found that a presentation on cheating in the gaming industry is speech in direct connection with an  
 10 issue of public interest. (*See Taylor v. Colon* (Nev. 2020) 468 P.3d 820, 826). California has found that  
 11 gambling events such as horse racing are “matter[s] of serious public concern because [they] involve[]  
 12 gambling on a large-scale basis ....” (*Mosesian v. McClatchy Newspapers* (1991) 233 Cal. App. 3d 1685,  
 13 1702) [statements from plaintiff with the intent of influencing public officials to grant plaintiff a  
 14 gaming license was a public figure for purposes of qualifications of plaintiff to obtain renewed license].

15 Plaintiff is famous in the professional poker community. He regularly appeared on Stones  
 16 Live games, obtained an extremely rare win record, and garnered effusive praise and promotion from  
 17 Stones Hall and the press. He was an up-and-coming star in the community prior to Brill’s statements  
 18 on September 28, 2019. Plaintiff’s honesty during poker games was a matter of public interest; every  
 19 viewer, player, and host has an interest in learning whether a star player is cheating.

20 **4.1.2 Plaintiff’s Claims Premise Liability on Brill’s Protected Conduct**

21 Plaintiff’s claims premise liability upon Brill’s statements in connection with the above-  
 22 identified issue of public interest. Plaintiff premises all of his causes of action on Defendants’  
 23 statements that he characterizes as allegations that he cheated. The only allegations specifically against  
 24 Brill are that she (1) reported her suspicions of Plaintiff cheating to Kuraitis in March, 2019;<sup>9</sup> (2) made

25 <sup>9</sup> Though Plaintiff mentions these statements, he does not claim they were defamatory and does  
 26 not allege they caused any harm to him. They thus appear to be included for context, and not because  
 27 he is basing his claims on them. If Plaintiff actually does premise liability on these March 2019

1 the statements in her September 28, 2019 tweets in which she shared her opinion that Plaintiff was  
 2 cheating; and (3) allegedly claimed Plaintiff was a cheater in subsequent YouTube videos.

3 Brill's statements were also made in a public forum. (*See Ampex Corp. v. Cargle* (2005) 128 Cal.  
 4 App. 4th 1569, 1576) [Yahoo! message board for publicly traded company a public forum]. Because  
 5 Brill's statements were made on Twitter and YouTube, popular publicly accessible websites, they  
 6 were made in a public forum.

7 As Brill has met her burden under the first prong of the Anti-SLAPP statute, the burden  
 8 shifts to Plaintiff to show a probability of prevailing on his claims. He cannot do so.

9 **4.2 Plaintiff Cannot Show a Probability of Prevailing on His Claims**

10 To survive an Anti-SLAPP motion, a plaintiff must provide *prima facie* evidence establishing a  
 11 probability of prevailing on its claims. Plaintiff must present "substantial evidence that would support  
 12 a judgment of relief made in the plaintiff's favor." (*S. Sutter, LLC v. LJ Sutter Partners, L.P.*, (2011) 193  
 13 Cal. App. 4th 634, 670).

14 **4.2.1 Defamation**

15 Plaintiff's first two claims are for libel and slander per se -- defamation. A defamation plaintiff  
 16 must show the defendant (1) published a false statement of fact (2) of or concerning the plaintiff (3)  
 17 which is unprivileged; and (4) which either has a natural tendency to injure the plaintiff's reputation  
 18 or causes special damage. (*See Ringle Associates Inc. v. Maryland Co.* (2000) 80 Cal. App. 4th 1165, 1179).

19 **4.2.1.1 Plaintiff's Defamation Claims are Time-Barred**

20 Cal. Code Civ. Proc. § 340(c) provides a one-year statute of limitations for defamation. The  
 21 Single Publication Act, Cal. Civ. Code § 3425.1-3425.5, establishes that the statute of limitations begins  
 22 to run upon initial publication; it is not renewed simply because the statements in the publication are  
 23 subsequently repeated. (*See Shively v. Bozanich* (2003) 31 Cal. 4th 1230, 1245-46). Brill made her  
 24 statements on September 28, 2019, and Plaintiff admits he was aware of these statements as of  
 25 \_\_\_\_\_  
 26 statements, they are protected because they are inextricably intertwined with the statements Brill made  
 27 publicly. (*Lauter v. Anoufrieva* (C.D. Cal. 2008) 642 F. Supp. 2d 1060, 1109) (emphasis added); (*see also*  
*Salma v. Capon* (2008) 161 Cal. App. 4th 1275, 1287) [cause of action based on both protected and  
 unprotected activity under California's Anti-SLAPP statute is subject to an Anti-SLAPP motion].

1 September 28. Any republication of these statements was done by third parties or other Defendants,  
 2 which did not reset the one-year statute of limitations. The defamation claims are time-barred.

3 **4.2.1.2 Statements of Opinion are Not Defamatory**

4 To be defamatory, a statement must either be a false factual assertion, or must be a statement  
 5 that implies the existence of undisclosed, false facts. (*See Nygard*, 159 Cal. App. 4th at 1048).  
 6 Statements of opinion are not subject to defamation claims. Language that is loose, figurative, or  
 7 hyperbolic negates the impression that a statement is asserting actual facts. Accordingly, vague,  
 8 unprovable statements and statements of opinion do not give rise to a defamation claim. (*Letter*  
 9 *Carriers v. Austin* (1974) 418 U.S. 264, 284-286; (*see also Milkovich v. Lorain Journal Co.* (1990) 497 U.S.  
 10 1, 20). “This provides assurance that public debate will not suffer for lack of ‘imaginative expression’  
 11 or the ‘rhetorical hyperbole’ which has traditionally added much to the discourse of our Nation.”  
 12 (*Milkovich*, 497 U.S. at 20). A statement of opinion or rhetorical hyperbole, even if objectively  
 13 unjustified or made in bad faith, is not defamatory. (*See Campanelli v. Regents of University of California*  
 14 (1996) 44 Cal. App. 4th 572, 578). If a statement of opinion implies allegedly false facts, **there is no**  
 15 **liability if these facts are disclosed to the reader.** (*See Integrated Healthcare Holdings, Inc. v. Fitzgibbons*  
 16 (2006) 140 Cal. App. 4th 515, 527). Whether a statement is capable of defamatory meaning is a  
 17 question of law for the Court to decide. (*See Seelig*, 97 Cal. App. 4th at 809).

18 We must consider the context in which a statement is made and the totality of the  
 19 circumstances to determine whether it is defamatory. (*See Nygard*, 159 Cal. App. 4th at 1049). Brill  
 20 made her statements on Twitter. The public is used to seeing fiery rhetoric on online fora, and courts  
 21 recognize that this context makes it less likely that a reader will interpret statements published in such  
 22 places as actionable statements of fact. (*See Summit Bank v. Rogers* (2012) 206 Cal. App. 4th 669, 696-  
 23 97) [finding that readers of statements posted in “Rants and Raves” section of Craigslist were unlikely  
 24 to view statements as assertions of fact]; (*see also Global Telemedia Internat., Inc. v. John Doe 1* (C.D. Cal.  
 25 2001) 132 F. Supp. 2d 1261, 1267) [finding that Internet postings “are full of hyperbole, invective,  
 26 short-hand phrases and language not generally found in fact-based documents, such as corporate press  
 27 releases or SEC filings”]; (*and see Krinsky v Doe 6* (2008) 159 Cal. App. 4th 1154, 1163).

#### 4.2.1.3 Brill's Statements are Expressions of Opinion

Plaintiff's Complaint relies on inaccurate characterizations of Brill's statements and ignores their context. Brill discloses that she does not know for certain whether Plaintiff is cheating, but suspects that he is and that other players voiced similar concerns. (Brill Decl. at Exhibit A.) She is disclosing that she is speculating as to the technical method by which Plaintiff may have cheated. (*Id.*) She concludes by posting videos of Plaintiff playing in Stones Live games and encourages her readers to "decide for yourself." (*Id.*) This is far from making an unambiguous statement that Plaintiff is cheating. Rather, Brill is claiming that Plaintiff has engaged in unusual conduct, has an unusually high win rate, and that others professional players have expressed concerns. She expressed an opinion that Plaintiff was cheating and provided the factual bases for her opinion.

"When the facts underlying a statement of opinion are disclosed, readers will understand they are getting the author's interpretation of the facts presented; they are therefore unlikely to construe the statement as insinuating the existence of additional, undisclosed facts." (*Franklin v. Dynamic Details, Inc.* (2004) 116 Cal. App. 4th 375, 387) (quoting *Standing Comm. On Discipline of the United States Dist. Court v. Yagman* (9th Cir. 1995) 55 F.3d 1430, 1439). "When the facts supporting an opinion are disclosed, 'readers are free to accept or reject the author's opinion based on their own independent evaluation of the facts.'" (*Id.*) *Dynamic Details* dealt with statements by the defendant accusing the plaintiff criminal copyright infringement, but in publishing these statements he disclosed the basis for his conclusion by providing links to the plaintiff's website and a third-party site that he believed showed unlawful copying. (*Id.* at 387-88.) It was important that the statements invited the reader to view these sources on their own and come to their own conclusions. (*Id.* at 388-89.)

That is what happened here. Brill disclosed the facts on which she based her opinion, provided links to videos of Plaintiff's playing, and encouraged readers to view these videos and come to their own conclusions. Her statements are expressions of opinion and thus cannot be defamatory. The Court should dismiss Plaintiff's first two claims for relief with prejudice.

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**4.2.1.4 Plaintiff is a Limited-Purpose Public Figure**

A limited purpose public figure “voluntarily injects himself or is drawn into a particular public controversy and thereby becomes a public figure for a limited range of issues.” (*Gertz v. Robert Welch* (1974) 418 U.S. 323, 351). The test for limited public figure status in California is as follows:

First, there must be a public controversy, which means the issue was debated publicly and had foreseeable and substantial ramifications for nonparticipants. Second, the plaintiff must have undertaken some voluntary act through which he or she sought to influence resolution of the public issue. In this regard it is sufficient that the plaintiff attempts to thrust him or herself into the public eye. And finally, the alleged defamation must be germane to the plaintiff’s participation in the controversy.

(*Ampex Corp. v. Cargle* (2005) 128 Cal. App. 4th 1569, 1577). This is a question of law for the Court to decide. (See *Khawar v. Globe Internat.* (1998) 19 Cal. 4th 254, 264).

As explained in Section 2.1, *supra*, Plaintiff was a well-known professional poker player who regularly played in televised games. He was on a highly publicized “hot streak” and multiple professional poker players and commentators commented on his unusual degree of success. Stones Hall even publicized Plaintiff as a Christ-like figure due to his inexplicable “skill” as a poker player. Plaintiff was a poker celebrity entirely of his own voluntary actions, there was plenty of discussion of his success and his play style, and Brill’s statements were directly connected to the source of his celebrity. For purposes of Brill’s statements alleging he cheated, Plaintiff is a public figure.

**4.2.1.5 Plaintiff Cannot Show Negligence, Much Less Actual Malice**

A public figure bringing a defamation suit must show that a defendant made her statements with “actual malice,” i.e., “with knowledge that it was false or with reckless disregard of whether it was true or not.” (*New York Times Co.* (1964) 376 U.S. 254, 279-80). A plaintiff must prove that the defendant either knew her statement was false or subjectively entertained serious doubt that her statement was truthful. (See *Bose Corp.*, 466 U.S. at 511 n.30). The question is not “whether a reasonably prudent man would have published, or would have investigated before publishing. There must be sufficient evidence to permit the conclusion that the defendant in fact entertained serious doubts as to the truth of his publication.” (*Reader’s Digest Assn. v. Superior Court* (Cal. 1984) 690 P.2d 610, 617-18). Moreover, “[a] publisher does not have to investigate personally, but may rely on the

1 investigation and conclusions of reputable sources.” (*Id.* at 619). A plaintiff must make a showing of  
 2 actual malice with clear and convincing evidence. (*See Bose Corp.*, 466 U.S. at 511). This is a  
 3 requirement that presents “a heavy burden, far in excess of the preponderance sufficient for most civil  
 4 litigation.” (*Hoffman v. Capital Cities/ABC, Inc.* (9th Cir. 2001) 255 F.3d 1180, 1186-87) (internal  
 5 quotation marks omitted).

6 Brill subjectively believed her statements accusing Plaintiff of cheating were true. (Brill Decl.  
 7 at ¶ 33.) As explained in Section 2.2, *supra*, she conducted her own investigation into Plaintiff, heard  
 8 of other players voicing suspicions of Plaintiff, and concluded the most likely explanation was that  
 9 Plaintiff was cheating.

10 Plaintiff offers little more than conclusory claims of actual malice in his Complaint. The only  
 11 factual allegation relevant to actual malice is that Brill played in and hosted Stones Live games where  
 12 Plaintiff was present even after reporting her suspicions to Stones Hall. (Complaint at ¶ 33.)  
 13 Presumably, Plaintiff’s argument is that Brill did not believe Plaintiff was a cheater because she waited  
 14 until September 2019 to publicly denounce one of the most prominent Stones Hall players.

15 The fact that Brill privately communicated her concerns to Stones Hall months before going  
 16 public with her allegations shows that she genuinely harbored suspicions about Plaintiff for months  
 17 before publishing her statements at issue. (Brill Decl. at ¶¶ 19-23.) Stones Hall conducting an  
 18 investigation and finding Plaintiff was not a cheater did not exonerate him in Brill’s eyes because Brill  
 19 believed Plaintiff was being assisted by someone within Stones Hall. (Brill Decl. at ¶¶ 24-25.) The  
 20 conclusions of subsequent investigations into Plaintiff’s cheating have no bearing on Brill’s state of  
 21 mind, as she was not aware of such conclusions at the time of publication.

22 **4.2.2 Trade Libel**

23 A statement must be false and factual to constitute trade libel. (*ComputerXpress, Inc. v. Jackson*  
 24 (2001) 93 Cal. App. 4th 993, 1010). However, “[t]rade libel is generally distinguished from common  
 25 law defamation and is said to connote ‘an intentional disparagement of the quality of property, which  
 26 results in pecuniary damage to plaintiff.’” (*Barnes-Hind, Inc. v. Superior Court* (1986) 181 Cal. App. 3d  
 27 377, 381) (quoting *Erllich v. Etner* (1964) 224 Cal. App. 2d 69, 73). Trade libel applies only to statements

1 regarding the quality of goods or services, not a plaintiff's reputation; for this reason, all trade libel  
 2 plaintiffs must establish actual malice to prevail. (*See Melalenuca, Inc. v. Clark* (1998) 66 Cal. App. 4th  
 3 1344, 1360).

4 Plaintiff does not assert a trade libel claim. His allegations relate to harm to his personal and  
 5 professional reputation, and he refers to the allegedly "false and defamatory" statements. (Complaint  
 6 at ¶¶ 127-130.) There are no allegations relating to the quality of Plaintiff's goods or services, meaning  
 7 his trade libel claim is purely duplicative, and actual malice is not met.

8 **4.2.3 False Light**

9 False light claims are invasion of privacy claims, and invasion of privacy claims have a one-  
 10 year statute of limitations. (*See Cain v. State Farm Mut. Auto. Ins. Co.* (1976) 62 Cal. App. 3d 310, 313).  
 11 Plaintiff brought his claim more than one year after the fact. His false light claim is time-barred.

12 "A 'false light' cause of action is in substance equivalent to a libel claim and should meet the  
 13 same requirements of the libel claim, including proof of malice." (*Brodeur v. Atlas Entertainment, Inc.*  
 14 (2016) 248 Cal. App. 4th 665, 678) (quoting *Aisenson v. American Broadcasting Co.* (1990) 220 Cal. App.  
 15 3d 146, 161). The same defenses available for defamation claims are available for false light claims.  
 16 (*See Fellows v. Nat'l Enquirer* (1986) 42 Cal. 3d 234, 245-46) (collecting cases). When a false light claim  
 17 exists alongside a defamation claim, "the false light claim is essentially superfluous, and stands or falls  
 18 on whether it meets the same requirements as the defamation cause of action." (*Eisenberg v. Alameda*  
 19 *Newspapers, Inc.*, (1999) 74 Cal. App. 4th 1359, 1385 n.13).

20 Plaintiff's false light claim is duplicative of the defamation and amounts to mere "surplusage."  
 21 (*Selleck v. Globe Int'l* (1985) 166 Cal. App. 3d 1123, 1136). It is based on the same facts as the  
 22 defamation claims and alleges the same kind of injuries. (Complaint at ¶¶ 136-41.) It is duplicative of  
 23 the defamation claims and even if it were not, the false light analysis is the same as the defamation  
 24 analysis.

25 **4.2.4 Intentional Interference with Prospective Economic Advantage**

26 Tortious interference requires: "(1) an economic relationship between the plaintiff and some  
 27 third party, with the probability of future economic benefit to the plaintiff; (2) the defendant's

1 knowledge of the relationship; (3) intentional acts on the part of the defendant designed to disrupt the  
 2 relationship; (4) actual disruption of the relationship; (5) economic harm to the plaintiff proximately  
 3 caused by the acts of the defendant.” (*Westside Center Associates v. Safeway Stores, Inc.* (1996) 42 Cal. App.  
 4 4th 507, 521-22). There must be a wrongful act beyond the alleged interference itself. (*Korea Supply*  
 5 *Co. v. Lockheed Martin Corp.* (2003) 29 Cal. 4th 1134, 1154). This claim fails for the same reasons as the  
 6 defamation claims. (*See Blatty v. New York Times Co.* (1986) 42 Cal. 3d 1033, 1045-47).

7 **4.2.5 Unfair Competition**

8 California Business & Professions Code § 17200 (the “UCL”) prohibits “any unlawful, unfair  
 9 or fraudulent business act or practice and unfair, deceptive, untrue or misleading advertising . . . .” The  
 10 UCL claim is predicated on Brill’s alleged defamation and intentional interference. This fails for the  
 11 same reasons those claims fail. (*See Integrated Healthcare Holdings, Inc. v. Fitzgibbons* (2006) 140 Cal. App.  
 12 4th 515, 533) [UCL claim premised on alleged defamation; finding that “[b]ecause we conclude the  
 13 message did not constitute actionable defamation, IHHI’s action for violation of the [UCL] also fails  
 14 for this reason”].

15 **4.2.6 Intentional Infliction of Emotional Distress**

16 An intentional infliction of emotional distress (“IIED”) claim requires: “(1) extreme and  
 17 outrageous conduct with the intention of causing, or reckless disregard of the probability of causing,  
 18 emotional distress; (2) the plaintiff has suffered severe or extreme emotional distress; and (3) the  
 19 defendant’s outrageous conduct was the actual and proximate causation of the emotional distress.”  
 20 (*Jackson v. Mayweather* (2017) 10 Cal. App. 5th 1240, 1265). Emotional distress is only sufficiently  
 21 severe or extreme if it is “of such substantial quality or enduring quality that no reasonable [person]  
 22 in civilized society should be expected to endure it.” (*Hughes v. Pair* (2009) 46 Cal. 4th 1035, 1051).

23 “Outrageous” conduct is conduct so “extreme as to exceed all bounds of that usually tolerated  
 24 in a civilized community.” (*Id.* at 1050). The tort “does not extend to mere insults, indignities, threats,  
 25 annoyances, petty oppressions, or other trivialities.” (*Id.* at 1051). Even an allegedly false accusation  
 26 of **sexual assault** made to a human resources department does not constitute extreme and outrageous  
 27



1 conduct. (*Comstock v. Aber* (2012) 212 Cal. App. 4th 931, 954). Whether conduct is sufficiently extreme  
 2 and outrageous is a decision for the Court. (*See Chang v. Lederman* (2009) 172 Cal. App. 4th 67, 87).

3 A plaintiff cannot avoid the First Amendment merely by styling a defamation claim as IIED;  
 4 there must still be a false statement of fact and actual malice for public figures. (*Hustler Magazine v.*  
 5 *Falwell* (1988) 485 U.S. 46, 56-57). As explained above, there is no actionable statement of fact and  
 6 Brill did not publish with actual malice. This claim thus fails.

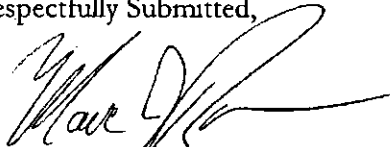
7 The claim also fails because there is no extreme or outrageous conduct alleged, nor is there is  
 8 any severe emotional distress. Accusing someone of cheating at cards is not “intolerable in a civilized  
 9 society;” it is the kind of garden-variety insult flung at a player who acts suspiciously at a poker table.  
 10 And while Plaintiff alleges extreme emotional distress as a result of Defendants’ statements, Plaintiff  
 11 does not allege Brill made any threats against him or that her statements caused him to be “scared to  
 12 leave his home ....” (Complaint at ¶ 160.) The only things potentially causing extreme emotional  
 13 distress are the actions of third parties, not Brill. Many of the alleged damages do not amount to  
 14 severe emotional distress, either. Plaintiff complains of “uncertainty about his future, [] humiliation,”  
 15 and loss of sleep, which are not the kinds of emotional harms with which this tort is concerned.  
 16 (Complaint at ¶¶ 161-62.) Plaintiff’s IIED claim fails.

17 **5.0 CONCLUSION**

18 Based on the foregoing, Defendant Veronica Brill hereby respectfully requests that the Court  
 19 grant her Special Motion to Strike pursuant to California’s Anti-SLAPP Statute.

20 Dated: January 6, 2021.

Respectfully Submitted,



Marc J. Randazza, SBN 269535  
 Alex J. Shepard, SBN 295058  
 RANDAZZA LEGAL GROUP, PLLC  
 2764 Lake Sahara Drive Suite 109  
 Las Vegas, NV 89117  
 Telephone: 702-420-2001  
 ecf@randazza.com

*Attorneys for Defendant,  
 Veronica Brill*

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**PROOF OF SERVICE**

*Postle v. Brill, et al.* | Sacramento County Superior Court | Case No. Case No. 34-2020-00286265

At the time of service, I was over the age of 18 and not a party to this action. I am employed in the County of Clark, State of Nevada. My business address is Randazza Legal Group, PLLC, 2764 Lake Sahara Drive, Suite 109, Las Vegas, Nevada 89117.

On January 6, 2021, I served true and correct copies of the foregoing document, entitled:

**DEFENDANT VERONICA BRILL'S NOTICE OF MOTION AND  
SPECIAL MOTION TO STRIKE PLAINTIFF'S COMPLAINT**

on the interested parties as follows:

Steven T. Lowe, Esq. (SBN 122208)  
 Jared T. Densen, Esq. (SBN 325164)  
**Lowe & Associates, P.C.**  
 <steven@lowelaw.com>  
 <jared@lowelaw.com>  
 8383 Wilshire Blvd., Ste. 1038  
 Beverly Hills, CA 90211  
 Phone: (310) 477-5811

*Attorneys for Plaintiff, Michael Postle*

**BY UNITED STATES MAIL.** I enclosed the documents listed above in a sealed envelope or package addressed to the persons at the addresses above, and deposited the sealed envelope with the United States Postal Service, with postage fully prepaid; and,

**BY ELECTRONIC MAIL.** I electronically served the documents listed above to the persons at the electronic mail addresses listed above, from my electronic service address, hme@randazza.com.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

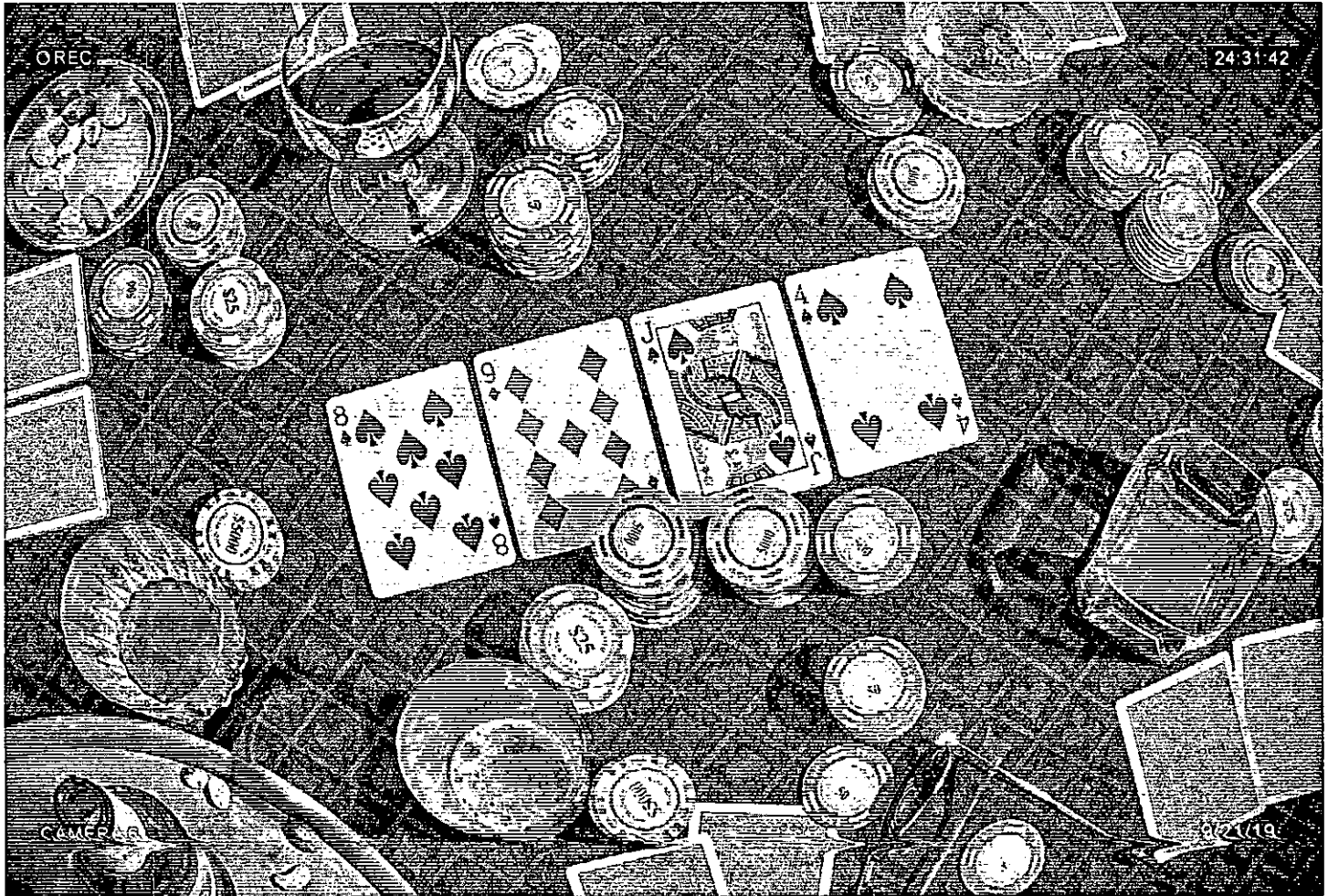
Executed on January 6, 2021 at Las Vegas, Nevada.



\_\_\_\_\_  
 Employee,  
 Randazza Legal Group, PLLC

## **EXHIBIT 1**

Brendan I Koerner, "The Cheating Scandal That Ripped the Poker World Apart,"  
Wired (Sept. 21, 2020)



PHOTOGRAPH: KEIRNAN MONAGHAN &amp; THEO VANVOUNAKIS

BRENDAN J. KOERNER

SECURITY 09.21.2020 06:00 AM

## The Cheating Scandal That Ripped the Poker World Apart

Mike Postle was on an epic winning streak at a California casino. Veronica Brill thought he had to be playing dirty. Let the chips fall where they may.



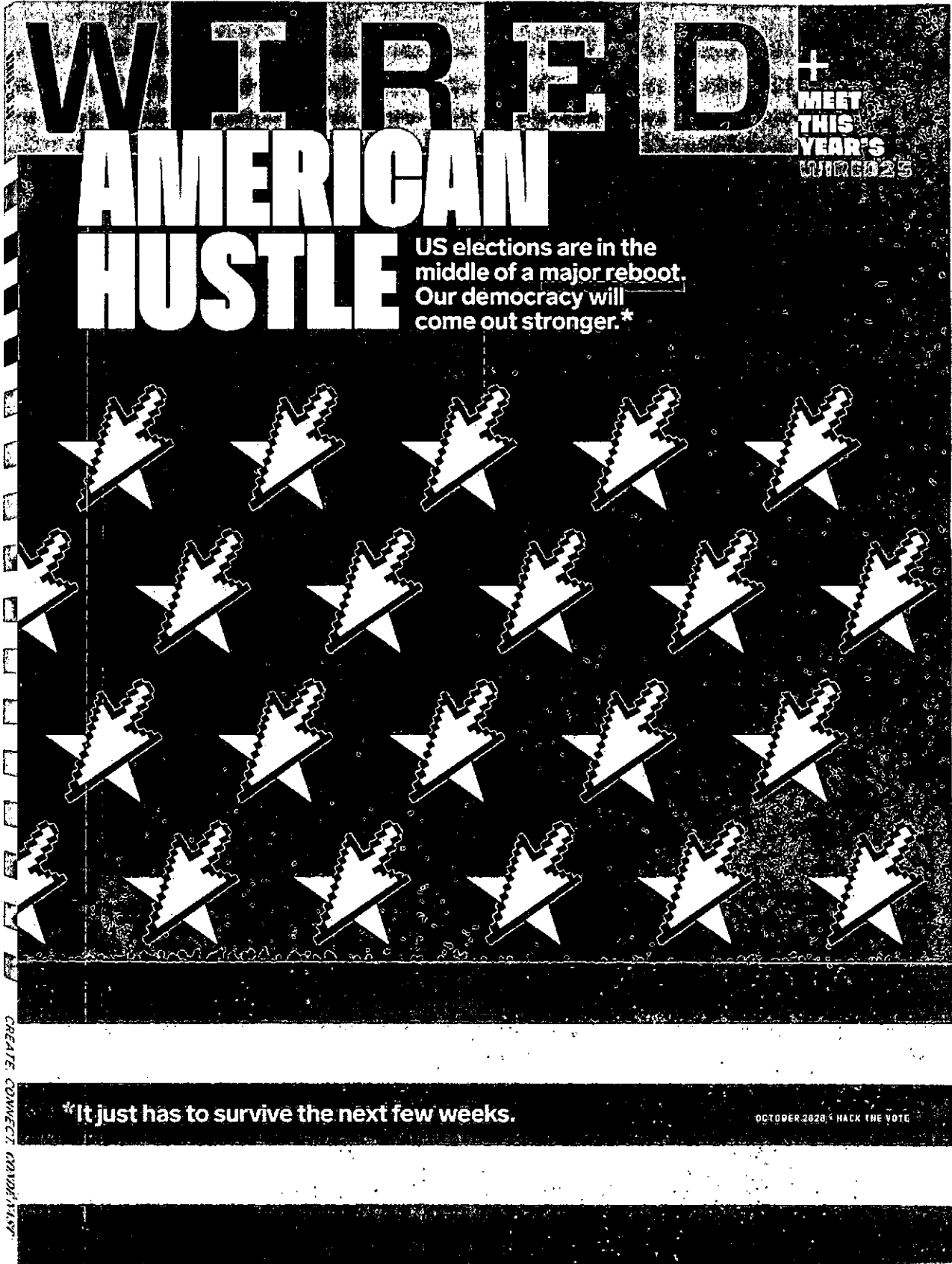
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**Audio:** Listen to this article.

MIKE POSTLE WAS on another tear. The moonfaced 42-year-old was deep into a marathon poker session at Stones Gambling Hall, a boxy glass-and-steel casino wedged between Interstate 80 and a Popeye's in suburban Sacramento.

The September 21, 2019, game, which Stones was broadcasting to audiences via [YouTube](#) and [Twitch](#), had attracted several top players to the casino's card room, a gaudily lit space done up like an Old West saloon. One pro from Las Vegas had flown in on a chartered jet with \$50,000 in cash. Yet, as usual when he appeared on Stones' livestream, Postle was shredding the competition; he was the evening's chips leader by a comfortable margin.

Five hours into the show, a curious hand took shape. Like all games of Texas Hold 'Em, the most widely televised form of poker, the action began with each player receiving two face-down cards—the hole cards. Five community cards were then to be dealt face-up in three rounds, with opportunities for betting in between. The first face-up batch, called the flop, would consist of three cards. After that, the dealer would add a single card (“the turn”) followed by one more (“the river”). Players would vie for the pot by assembling the best five-card hands using their hole cards and the shared array.



CREATE. CONNECT. CONVINCE.

\*It just has to survive the next few weeks.

OCTOBER 2020 | HACK THE VOTE

This feature appears in the October 2020 issue. [Subscribe to WIRED.](#)

Even before the flop, though, seven of the nine players chose to fold. Postle, who'd been dealt the queen of diamonds and jack of hearts, pressed forward with the hand. His sole opponent would be Marle Cordeiro, a Las Vegas-based pro with a large social media following.

The flop contained the 8 of spades, 9 of diamonds, and jack of diamonds—a promising trio for Postle, who now had a pair (jacks) and was just a 10 away from a queen-high straight (8–9–10–jack–queen). There were two shared cards left to be dealt. The turn produced the relatively useless 4 of spades, after which Cordeiro placed a \$600 bet.

Postle, his white baseball cap nearly concealing his eyes, clutched his right shoulder with his left hand as he mulled his options. Most seasoned players would call or raise in his situation: The statistical likelihood that his hand would yield a favorable monetary outcome was high enough to make proceeding to the river an easy choice. But Postle had an unorthodox style of play, and he often made decisions that his rivals deemed either wildly aggressive or inexplicably meek. Those instincts had served him well in recent months: He was in the midst of an epic winning streak—a “heater”—that had turned him into a local folk hero. He'd become such a force on Stones' livestream, in fact, that casino regulars had taken to calling him the Messiah and even God.

Postle spent half a minute in quiet contemplation, almost motionless in his black leather chair. Then, pursing his lips in resignation, he chucked his cards forward to fold.

Postle's surrender, though counterintuitive, turned out to be a canny move because Cordeiro was holding “the nuts”—poker slang for the most valuable hand. Her hidden hole cards were the 10 of diamonds and queen of spades, so she'd already secured a queen-high straight before the river; she had a 96 percent chance of maintaining her edge once all the cards were dealt.

Justin Kelly, one of the livestream's two commentators, gushed over the genius of Postle's eccentric play. “This is what I'm talking about people!” he exclaimed from his broadcast booth across the room. “Postle takes the weirdest lines and gets people to lay down huge hands all the time. But when he has top pair and a straight draw, he is able to just lay down against the nuts. Postle is just like a freak! He's just a freak of nature.”

Kelly's co-commentator, 42-year-old Veronica Brill, did not share his sense of awe. She had been observing Postle up close for a while, both as an opponent at the table and a broadcaster, and she'd come to believe there was a nefarious reason for his success. For months she'd resisted mentioning her suspicions on the livestream, hoping that Stones would handle the matter behind the scenes. But the fold against Cordeiro struck her as so fishy that she could no longer keep quiet. Brill leaned back, gently shook her head, and took a half-step toward calling out God.

“It doesn't make sense,” she said, her soft monotone tinged with mockery. “It's like he knows. It doesn't make sense. It's weird.” Sounding caught off guard by his cohost's skeptical remarks, Kelly continued effusively—“Absolute insanity, guys!”—before managing to change the subject.

Late that night, as she drove in silence toward her Bay Area home, Brill turned the broadcast over and over in her mind. Her insinuation about Postle, though subtle, had the potential to cause a stir. Fellow players would gossip that jealousy had driven her to smear a more accomplished rival, a decent man who'd just come through a harrowing family drama. Gilding west on Interstate 80, Brill realized she had no choice but to commit one of poker's cardinal sins.

LIKE MANY OTHERS who spent huge chunks of time at Stones, Brill had long considered Postle a friend. A generous soul who exuded a puckish charm, Postle was the sort who'd pay for everyone's drinks while regaling the bar with bawdy tales. (He was particularly fond of a story about getting banned from Caesars Palace over a misunderstanding involving a sex worker.) But up until the summer of 2018, few of the pro players at Stones thought much of his poker prowess. "He was playing well enough to support himself, it seemed," says Jake Rosenstiel, a Sacramento pro. "But none of us thought Mike was this great poker player."

Everyone was thus surprised when Postle began to dominate the casino's livestreamed Texas Hold 'Em games starting in July 2018. The once middling Postle suddenly turned formidable, even taking thousands of dollars off some big-time players during their swings through Northern California. (Stones is not ordinarily a mecca for high rollers, but its popular livestreamed games occasionally draw big names from Las Vegas and points south.) As Postle's heater stretched over months, Stones' broadcast team did its best to turn him into a poker celebrity. They created a series of graphics designed to hype his talents: One was a mock book cover that listed Postle as the author of a guide to "crushing souls and running pure"; another showed Postle's face superimposed over that of Jesus.

Brill, a self-described analytics geek whose day job is building medical software, was among those who got clobbered by Postle at the table, and she served as a livestream commentator during much of his streak too. By early 2019, she had seen enough to surmise that Postle's success didn't make mathematical sense. She thought he was winning far too often, particularly for a player whose strategy didn't jibe with game theory optimal, or GTO, the prevailing strategy in Texas Hold 'Em today.

The fundamental idea behind GTO is that there's a single best decision for every imaginable betting scenario—a decision that will maximize a player's winnings over time. In any given hand, a player who perfectly executes game theory optimal may still lose; there's only so much you can do if your opponent lucks into the nuts. But in the course of thousands of hours of poker, a player who adheres to GTO at every moment is virtually guaranteed to come out ahead.

Tremendous effort is required to develop the ability to know which single move to make in the millions of possible betting situations. There are 2,598,960 possible hands in five-card poker, a figure that vastly understates the game's intricacy. Players must also have a feel for how their opponents are likely to react to each gambit. To hone their GTO chops, top pros spend hours a day analyzing past hands with software that pinpoints the precise moments when they flubbed a probability calculation.

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### BACKCHANNEL



**Poker and the Psychology of Uncertainty**

MARIA KONNIKOVA

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Brill could detect no trace of such a cerebral approach to poker in Postle's game. Time and again he made decisions that seemed to fly in the face of game theory optimal. The biggest oddity that stood out to Brill was the high rate at which Postle stayed in games prior to the flop, as measured by a statistic called "voluntarily put in pot," or VPIP. Postle often stuck around with hole cards that would lead most elite players to fold. But he rarely seemed to be punished for his audacity, and Brill thought this might be because he was operating with more complete information than anyone else at the table.

In March 2019, Brill approached Stones' tournament director, Justin Kuraitis, and shared her concerns about Postle. The table used for Stones' livestreamed games is embedded with RFID sensors that scan the hole cards and pipe that information into the livestream. Brill wondered whether there was any way Postle could be peeking at that data, even though the stream is broadcast on a 30-minute delay to prevent cheating.

Kuraitis dismissed Brill's inquiry as ridiculous. "Justin insists Stones is 100% secure and there is zero chance of cheating," Brill texted a friend who asked about the conversation. She added that Kuraitis said that most players simply failed to grasp Postle's brilliance.

Brill was not the only skeptic to confide in Kuraitis that month. On March 13, Kuraitis texted a pro named Kasey Mills to invite her to play in a livestreamed game. Mills asked whether Postle would be there, and then opened up about her misgivings. "I have concerns he may have found a way to cheat somehow," she wrote. "Or else he is a god which is very probable ... I've just never seen anything close to what happens to him and it can't help but draw questions." Kuraitis assured Mills that he conducted quarterly security audits, and that "game fairness is one of my highest priorities." (Mills declined the invitation, but she continued to play against Postle in the months that followed.)

By the late summer, however, there were so many whispers about Postle that his rivals were no longer content to take Kuraitis at his word. Rosenstiel, the Sacramento pro, says he approached the casino's management and proposed they look for potential security flaws that Postle might be taking advantage of. But management refused, assuring him there was no truth to the cheating rumors.

By blurting out her suspicions on the September 21 livestream, Brill had ensured that the buzz about Postle would intensify. She now felt obliged to detail her allegations in public. She didn't anticipate that doing so would make her persona non grata at Stones.

Veronica Brill felt obliged to go public with her suspicions. PHOTOGRAPH: CHRISTIE HEMM KLOK

ON SEPTEMBER 28, Postle became aware of a story making the rounds on poker Twitter. Shortly before noon that day, Brill had posted an 18-minute video that contained clips of Postle's most unusual hands. "Am I sure that this player is cheating? No," Brill wrote in an accompanying series of tweets. "Do I think that there is a greater than zero % chance that he is? Yes ... I feel that with such a high VPIP and play style, if we run the SIM a hundred times with players of equal competency he's running in the 95th percentile of results." Brill added that even though cell phones were banned at some point, she thought Postle might still be receiving signals, perhaps through "a small device on his leg that lets him know when he's ahead."

By evening, Postle's phone was blowing up with messages and calls from worried friends. "I asked him directly, 'Mike, did you cheat in our game?'" says Joe Blackwell, a poker host who worked the September 21 game. "And he said, 'No, Joe, I respect you too much for anything like that. I would never cheat anybody in this or any other game.' And I believed him."

After a sleepless night, Postle sent a long and rambling text to Brill. He blasted her for going public instead of coming to him to discuss the matter privately, and he wrote several hundred words in defense of his poker skills. "I played against and consistently beat some of the best players in the world," he claimed. "I profited over 2 million online from summer of 2003 until the beginning of 2008." He could not believe that Brill, a person who'd never been anything but nice to him, "would betray me like this and throw me to the wolves of public opinion."

**Postle became such a poker force that people took to calling him the Messiah and even God.**

Postle was hardly the only person to criticize Brill after her video went viral. She was roundly scolded for presenting a purely circumstantial case against Postle. In poker, it's sacrilege to accuse a peer of cheating without airtight proof. And all Brill had done was offer a speculative hypothesis based solely on math. "I told her, 'You're not providing enough evidence,'" says Matthew Berkey, a well-known pro who has earned more than \$4 million during his career. "In this game, trust and your word and your morality is currency ... So I kind of warned her that, hey, you're going to get a lot of backlash for this."

That backlash quickly turned vicious. On October 2, a player on Twitter launched a particularly cruel attack on Brill, one that made her curl up on the floor of her Santa Clara condo and cry. Brill, the author stated with poor punctuation, "couldn't wait for her own baby to die how sick is that."

**GROWING UP IN** Edmonton in the 1980s, Brill was always slightly embarrassed by her parents' struggle to assimilate to Canadian culture. The family had fled communist Poland when Veronica was 6, and they'd lived in an Austrian refugee camp before moving to Canada. Though he possessed an advanced degree in engineering, Veronica's father had to work as a janitor in his new homeland. He and Veronica's mother both worked punishing hours and refused to treat themselves to even small luxuries.

When she was old enough to take charge of her own social life, Brill indulged her yen to perform: In her twenties she competed in beauty pageants and spun hip hop at Edmonton clubs as DJ Lady V. She took a meandering route through university and became a licensed practical nurse, an occupation that enabled her to buy her first home at 28. (She later became an RN.) The place came with a broken satellite dish that picked up three channels, one of which showed British poker nonstop. To her surprise, Brill found herself glued to these games into the wee hours each night. She was captivated not just by the mathematical intricacies of the action but also by the players' attitude toward money. "Growing up so poor, my parents pinched every single penny," Brill says. "I watched poker players take their money and turn it into a tool. They were able to separate themselves from that monetary value, and they were able to grow this chip stack and use it as a tool and then invest in themselves."

After seeing a boyfriend lose entire weekends to poker, Brill was inspired to teach herself the game through trial and error at a casino in a West Edmonton mall. Soon she was trouncing the well-paid roughnecks who traveled down from

the Fort McMurray oil fields with thousands of dollars to burn. She'd then take her winnings to Las Vegas and lose it all to stronger players—the price a poker novice must pay to get better at their craft.

In 2008, Brill moved to Del Rio, Texas, to marry a US Air Force fighter pilot she'd met while he was taking part in a training exercise in Alberta. Four years later, the couple relocated to Sacramento when her husband was promoted to fly U-2 spy planes out of a nearby base. Though she had little professional experience outside nursing, Brill convinced a local hospital system to hire her for an IT job. She was put in charge of building software that streamlines how medical orders are processed. The new career sparked a deeper interest in advanced analytics, and in 2013 she began pursuing an online master's degree in predictive analytics from Northwestern University. At the time she was several months pregnant with her first child, a boy due to be born that June.

**“Stones became my one place I could go to not feel any pain, or just to numb it.”**

Brill's life was transformed by the arrival of her son, David, whose genetic luck could scarcely have been worse. The infant boy had lissencephaly, a rare disorder that caused him to have frequent seizures. Brill devoted herself to caring for David, who doctors said was unlikely to survive until his first birthday. On the infrequent occasions she was able to leave the house, she headed for local casinos where she could lose herself in the rigid logic of Texas Hold 'Em. Stones Gambling Hall became her favorite haunt.

Brill noticed that Stones, which had opened in July 2014, was trying to boost its visibility by livestreaming its most competitive games. If Stones could build a digital audience, top pros would be more likely to play at the casino and sing its praises on social media. That publicity, in turn, would lure more amateur players—the so-called fish who are the lifeblood of poker rooms in California, which earn their money by taking a cut from every game.

The gregarious Brill cajoled Stones into letting her host a monthly livestreamed game. She proved to be such a magnetic presence at the table that Stones asked her to work as a regular commentator for other games. Brill was a natural, adept at alternating between ribald jokes and deft observations. Few at the casino knew how much she was struggling with her son's illness, or what an alarming amount of red wine she was consuming to cope. “Stones became my one place I could go to not feel any pain,” she says, “or just to numb it for a little bit.”

David made it to his third birthday and seemed to be thriving, but then a devastating complication arose: He was diagnosed with an aggressive form of cancer, leading to his death in December 2016. Brill's marriage soon failed, a casualty of the couple's overwhelming grief. Desperate for some form of solace, she retreated ever deeper into the booze-soaked poker scene at Stones.

ON OCTOBER 1, as Brill was about to be savaged as a monster who'd neglected her dying son, one of poker's biggest names was busy rallying to her cause. Joey Ingram, a well-known player and host of the *Poker Life* podcast, had taken a keen interest in the video Brill had assembled of Postle's questionable hands. He had experience doing quasi-journalistic investigations of poker scandals—in 2018 he accused a Costa Rican poker website of using bots to undermine its human users. But he'd never heard of shenanigans in a live game streamed from a brick-and-mortar casino where thousands of people watch the players' every move.

Ingram doubted there was anything to Brill's story, but he decided to check out a year-old game on Stones' YouTube channel. Before long he was deep down the Mike Postle rabbit hole, reviewing hours of Texas Hold 'Em footage in lieu of eating or sleeping. "I watched every hand he played. The guy's running and gunning and making these amazing plays, amazing bluffs," Ingram says. "I watched four sessions that first night, and it was the same thing in all four sessions. And I'm like, something's really messed up here."

Around 4 am on October 1, Ingram began to livestream himself evaluating Postle's old games at Stones. For five hours he narrated hands, noting each time Postle made moves that seemed bizarre but still led to wins or minimized losses. He also noted that Postle had a habit of staring down at his lap—the place where he happened to keep his cell phone during games. "I was like, all right, he's looking at his crotch and he seems to be playing like he's a god," Ingram says.

Ingram's livestream was such a hit that he followed it up with another extended session the next day. Tens of thousands of poker aficionados tuned in, captivated not just by the brazenness of the alleged offenses but also by the implications it held for the poker industry at large. According to many poker observers, Postle's supposed deceit had only come to light because he'd gotten greedy and neglected to cover his tracks by occasionally losing on purpose. That meant smarter cheaters might be flying under the radar by keeping their win percentages from getting suspiciously high. "It's like when Sammy Sosa got caught—he wasn't the only one with a corked bat," says Jonathan Sofen, a poker journalist and semipro player. "Or the Houston Astros—they aren't the only ones who cheated in baseball."

Ingram's fans soon began to inundate poker forums with their own investigative work. A [thread](#) on a site called Two Plus Two quickly grew to hundreds of pages long, and its contributors posted spreadsheets and graphs that purported to show that Postle had won money in upwards of 86 percent of the Stones livestreamed games he'd taken part in—an accomplishment that should be next to impossible given the mathematical strictures of Texas Hold 'Em.

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The amateur detectives also highlighted several moments and visual details they claimed to be telltale signs of Postle's chicanery. They pointed to a clip from one game, for example, in which Postle appeared to resweep his hole cards over an RFID sensor because they hadn't registered. How, the sleuths asked, would Postle have known to do that unless he had access to the livestream? And was there a bulge beneath his omnipresent baseball cap that might be some sort of bone-conduction headphone, a receiver for inside information?

The crowdsourced investigation caught the attention of Scott Van Pelt, an anchor on ESPN's *SportsCenter*. On the night of October 3, Van Pelt spent three and a half minutes discussing the drama at Stones, and he made clear where his sympathies lay. "If you were this good, why would you be playing in games only with a videofeed at \$1/\$3 tables at Stones' poker room?" he asked as he wrapped the segment. "Why wouldn't you be in Vegas winning all the money in the world?"

With public opinion turning against him, Postle sought to seize back control of the narrative. He agreed to appear on an October 4 podcast hosted by Mike "The Mouth" Matusow. Sounding groggy and disjointed, Postle pleaded his innocence and argued that he'd been targeted by opponents who envied his minor fame: "There was a secret hatred for me for being made into, I guess, what you would compare to a reality TV star."

When Matusow invited his guest to refute the accusations, Postle replied in vague terms. "There aren't words to describe what I do," he said. "It's creative, diabolical, and predicated on having an MO of always trying to be the most unpredictable player at the table ... There's no book or anything out there that can explain what I do."

The interview did little to quell the poker world's growing belief that Postle was guilty as charged. Strangers started showing up at his house, in a subdivision near Stones; they would bang on his door at odd hours and threaten him with violence. Postle began to worry not just about the future of the only career he'd ever known, but also about the safety of his 8-year-old daughter.

PHOTOGRAPH: KEIRNAN MONAGHAN & THEO VAMVOUHAKIS

**EVEN AS A** child in Wisconsin, gambling was central to Mike Postle's life. Games he played with his five siblings often involved a wager—when they played Monopoly, for example, real money changed hands. Postle also invented games of skill and chance, including a prize wheel that he installed at the roller rink his father owned. Kids would pay 50 cents a spin for a chance to hit the \$5 jackpot. But as Andrew Postle, one of Mike's brothers, recounted on a Stones livestream in August 2019, the game was rigged. “My brother put some quarters behind the wheel so when you spun it, you'd always get so close to the \$5 bill,” he told one of the evening's commentators. “If there's an angle for my brother to do it, he'll do it.”

When he turned 18, as Andrew recalled, Postle got a job at one of the Indian casinos near his home. He started out making change for customers before becoming a dealer, a gig that deepened his interest in poker. In the early 2000s he moved south to work in the casinos of Tunica, Mississippi, a poker hotbed. He soon found that, given his natural

analytical gifts, he could make more money as a player than a dealer. By mid-decade, he was winning big tournaments. In one he claimed nearly \$120,000 in prize money. "He was ahead of the curve back then," says Michael Weyer, who came in second to Postle in a 2005 tournament. "He didn't amass that amount of chips by being a dummy."

While riding high in Tunica, Postle joined the masthead of a poker magazine called *Rounder Life*. He wound up dating one of the models featured in the publication, the Las Vegas-born daughter of a professional bowler. When she became pregnant in 2010, the couple moved to Sacramento so Postle's parents, who had relocated there, could help take care of the child. A year after giving birth, Postle's girlfriend told him she'd been diagnosed with a brain tumor that required a risky operation, and that she wanted to get married before she died. Two days after the couple's hasty wedding in December 2011, Postle's now wife had her supposed surgery; for months afterward, she wore bandages on her head and spoke of undergoing follow-up radiation treatments that her husband was not allowed to attend.

But the brain tumor story was a lie: An MRI taken just over a week before her "surgery" showed that her brain was normal. Before Postle became aware of how thoroughly he'd been fooled, he also learned that his wife was struggling with serious mental health and substance abuse issues. The couple tried to work out their problems in therapy, but the marriage was doomed: Postle filed for an annulment in December 2015. (Postle's ex-wife, who has changed her name and is now engaged, told me she regrets some of the ways she acted while drinking to excess during the marriage. She describes her relationship with Postle as "toxic" and says that, toward the end, she was desperate to get "out of the gambling lifestyle.")

An ugly custody dispute ensued, filled with restraining orders and accusations of domestic violence on both sides. In 2016, Postle's soon-to-be ex-wife took their daughter to Idaho to live with her new boyfriend. Postle spent a small fortune to press for his daughter's return—a financial burden in the best of times, but one that he must have felt even more acutely because his career was on the downswing. In the years since his move to California, poker had been overtaken by studious practitioners of game theory optimal, some of whom hold science and engineering degrees. Less scholarly players like Postle found themselves eking out a living at low-stakes tables. "The past five or six years, you have to constantly be improving your game, otherwise you lose," says Jonathan Sofen, the poker journalist. "Everybody today, they're studying game theory optimal, they're watching training videos and reading books. The field of players who don't study? They've mostly gone broke."

Postle was still tangling with his ex-wife in family court when his heater at Stones began in July 2018. His winnings came in handy as he continued paying legal fees. Over the next several months, to Postle's relief, the courts agreed he could have sole physical custody of his daughter, and his ex-wife was granted unsupervised visits. After nearly a decade of heartache and hard luck, all seemed to be going right in Postle's world.

AS THE STONES scandal gained national attention in October 2019, the conventional wisdom held that Postle's results were so anomalous that something hinky must have occurred. But there was still a giant hole in the case against "God": How could he have gotten his opponents' hole-card information in real time?

The man best equipped to answer that question was an Australian named Andrew Milner, the inventor of the RFID-equipped table that makes livestreamed poker possible. A former IT worker who plays Texas Hold 'Em as a hobby, Milner cobbled together his first table in 2008 with an eye toward using it as a training tool. But he found there was a huge



demand from casinos, which sought a low-cost way to reveal hole cards to spectators so they could broadcast games via the internet.

Justin Kuraitis, Stones' tournament director, called Milner in October and asked whether the RFID table had vulnerabilities that Postle could have exploited. Milner all but ruled out a theory that Postle might have tapped into the signal that's relayed from the table's sensors to the room that serves as the casino's broadcast center: That data is encrypted using the same technology employed by online banks, and it seemed unlikely that Postle had the technical skill to overcome such strong security. Milner did think it possible that Postle had installed a tiny webcam on the wall of the broadcast center, pointed at a PC screen that showed the livestream without delay. But the likeliest scenario, he suggested, involved an inside job. "I asked [Kuraitis], do you trust your people?" Milner recalls. "It doesn't matter how secure your environment is, if you can't trust the guys running it, all other measures are irrelevant." (When contacted for this story, Kuraitis' only response was to direct me to a *Rounder Life* story that suggests Brill fabricated the cheating scandal "to become 'a name' in the poker world," a charge she vehemently denies.)

If Postle did have an accomplice at Stones, they would have had little trouble avoiding detection. According to multiple people familiar with how Stones operates, security in the broadcast room was lackadaisical at best. One former contractor told me that he was able to have a masseuse come into the supposedly secure room while he was working on the livestream, and that no one batted an eye. (In a text message exchange with Kasey Mills, Kuraitis says that his rules forbade technicians from even bringing their cell phones into the control room.)

On October 8, the accomplice theory made an appearance in a \$30 million federal lawsuit filed by Veronica Brill and ultimately 87 other players—including Mills—who claimed either fraud or negligence by multiple defendants: Stones, Postle, Kuraitis, and an indeterminate number of unnamed collaborators. The plaintiffs' lawyer, Mac VerStandig, is an avid poker player who focuses on casino-related cases. The complaint contended that Postle had won at a clip "not known to have been achieved by any other poker player over such a significant period of time." The document spelled out what VerStandig and his clients believe went down:

*"The Plaintiffs have reason to believe the mechanisms through which these myriad acts of wire fraud were carried out by Mr. Postle, John Does 1–10 and Jane Does 1–10 involved Mr. Postle's cellular telephone being grasped by his left hand while concealed under the poker table and/or Mr. Postle's baseball cap being imbedded [sic] with a communications device creating an artificial bulge in its lining (that is notably absent in photographs of the same baseball cap on Mr. Postle when he is not playing on Stones Live Poker)."*

VerStandig also wrote that the plaintiffs had "a good faith basis upon which to allege the identity of the person who is John Doe 1," but added that he would prefer to refrain from doing so until the discovery process had run its course.

Stones hired the elite law firm of Boies Schiller Flexner to fight the suit, while Kuraitis retained one of Sacramento's top specialists in white-collar crime. Postle, however, decided to represent himself; according to one of his close friends, this was in large part because he was now broke, despite having won an estimated \$250,000 during his heater. (Postle has said he earned just \$80,000 from the winning streak, and that his accusers have erroneously included chips he bought or loans repaid by fellow players.)

As the legal pressure mounted, the dwindling number of people from the Stones scene who'd stayed in touch with Postle worried that he was buckling under the stress.

PHOTOGRAPH: KEIRNAN MONAGHAN & THEO VAMVOUNAKIS

**I MADE NUMEROUS** attempts to get in touch with Postle this past winter, including by visiting his home. I could tell right away the place was in rough shape. There was a downed tree in the overgrown front yard, the knob on the security door was loose, and the bent second-floor blinds were shut tight. I thought I heard a slight commotion when I rang the bell, but no one ever answered.

On March 7, Postle finally returned one of my many calls. He said he was at the airport on his way to Florida, where he planned to stay for an indeterminate amount of time. Though he declined to address the specific allegations against him, he did tell me that his appetite for poker had largely vanished, and that he'd instead been focusing on spending time with his daughter. He also railed against poker vloggers and social media figures for attacking him for their own cynical, money-grubbing motives. "I didn't really understand the whole fake-news manipulation that happens for the sake of a

story until this happened," he said. "More or less all of the information that's out there? Honestly, none of it's true. The exaggeration, the manipulation? It's just sickening."

In the weeks that followed, Postle promised to respond to a list of written questions about his past, and then apologized multiple times for blowing our agreed-upon deadline for his answers. After a while he stopped bothering to make excuses and fell silent.

Postle finally piped up again on June 4, a day after he'd received some welcome news: The federal court in California had granted Stones' motion to dismiss, largely on the grounds that California's gambling laws generally do not make poker losses recoverable through civil action. The judge left open an opportunity for VerStandig to refile if he could provide more information about how much money Stones had collected from the affected games, but Postle was in the clear. (At the time, Postle was still a defendant in a separate \$250,000 lawsuit filed in Nevada by Marle Cordeiro, the player whom he folded against during Brill's last broadcast at Stones. The Nevada court dismissed that case on August 14, citing its lack of jurisdiction in California.)

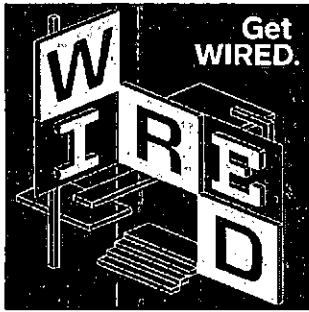
Postle did not seem to be in a jubilant mood when he reached me by text after his June legal victory. "Veronica is a toxic pathological liar who has proven narcissistic and sociopathic traits and has really gone off the deep end recently," he wrote, citing no evidence. He seemed convinced that Brill had concocted the charges against him to build her following on YouTube, where she was still posting videos about the case. Postle later apologized for his invective but declined to speak any further, stating that he'd only be able to reveal all once he was no longer in legal jeopardy: "I'll be able to give not just the truth, but the shocking events of everything in detail ... with the corresponding truth to corroborate it."

I did not hear from Postle again until mid-August, when he called to request that I delay publication of this story. I said I might be amenable to doing so if he could finally share some evidence to back up his assertion that Brill had plotted against him. After talking in circles for a while, Postle said he'd check with a lawyer and get back to me. In the end he didn't send anything. He also declined repeated requests to answer detailed fact-checking questions for this article.

**VERONICA BRILL WAS** bewildered by the dismissal of the federal lawsuit in California. "You can cheat on live TV and get away with it," she told me just minutes after learning of the judge's ruling. "So frustrating. It's not the money, per se. It's the lack of accountability."

Several weeks later, Brill received another bit of disconcerting news: Rather than refile an amended complaint, VerStandig asked her and the other plaintiffs to accept a settlement from Stones. Brill refused when she learned that, in exchange for a paltry sum, she would have to sign a public statement conceding there was "no forensic evidence that there was cheating at Stones." (In a statement to WIRED, a Stones representative emphasized that plaintiffs who settled would have to acknowledge that both the casino and Kuraltis "were not involved if there was any cheating by Postle.")

In the wake of the dissolution of her legal case, Brill began receiving a torrent of abuse from anonymous Twitter accounts. "You're a FN idiot!" wrote one user who went by KarmalsComing4U. "20 years ago we would of beat you ass for even accusing!!!!" (The account has since been deleted.) Brill fears that Postle plans to file a libel suit against her, which she assumes would take her years and her life savings to defend.

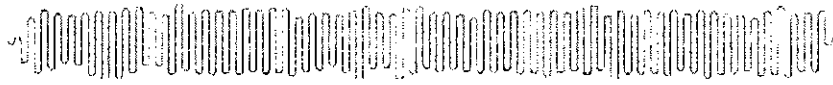


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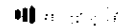
## The High-Stakes Data-Driven Poker Takedown

Mike Postle became an online sensation through the world of livestreamed poker. But how did he suddenly become a cheating pariah without any material evidence? Reporter Brendan Koerner takes us ...

00:00:00



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But Brill maintains she has no regrets about calling out Postle, an act she now views as part of a subconscious effort to move on from a dark period of her life. Stones was where she'd gone to mask her grief with an unhealthy amount of red wine and gambling; by blowing up her relationship with the casino, she liberated herself. "The game has gotten harder, I haven't been studying as much, and I'm very frustrated because I'm super-competitive," she says. "I'm actually better at analytics, at IT—y'know, everything else that I'm doing—and I'd rather put my time into that, where I can actually make some gains in lifelong terms."

Postle has an opportunity to put the Stones saga behind him, too. Though he says he's intent on marshaling evidence that will prove he's the victim of a grand conspiracy, there is a far simpler way to reclaim his reputation. "How do you prove you're not cheating at poker? You go play poker," Ingram says. "You would imagine that one of the best players you've ever seen in your life would have no issues saying, Let's play then. I can't really figure out an answer to why he won't do that." The livestream audience for God's return would surely be immense.

*Updated 9/23/2020 6:30 pm ET: A previous version of this story incorrectly stated the rules of Texas Hold 'Em. Players are not required to use their two hole cards when assembling their five-card hand.*

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*This article appears in the October issue. [Subscribe now.](#)*

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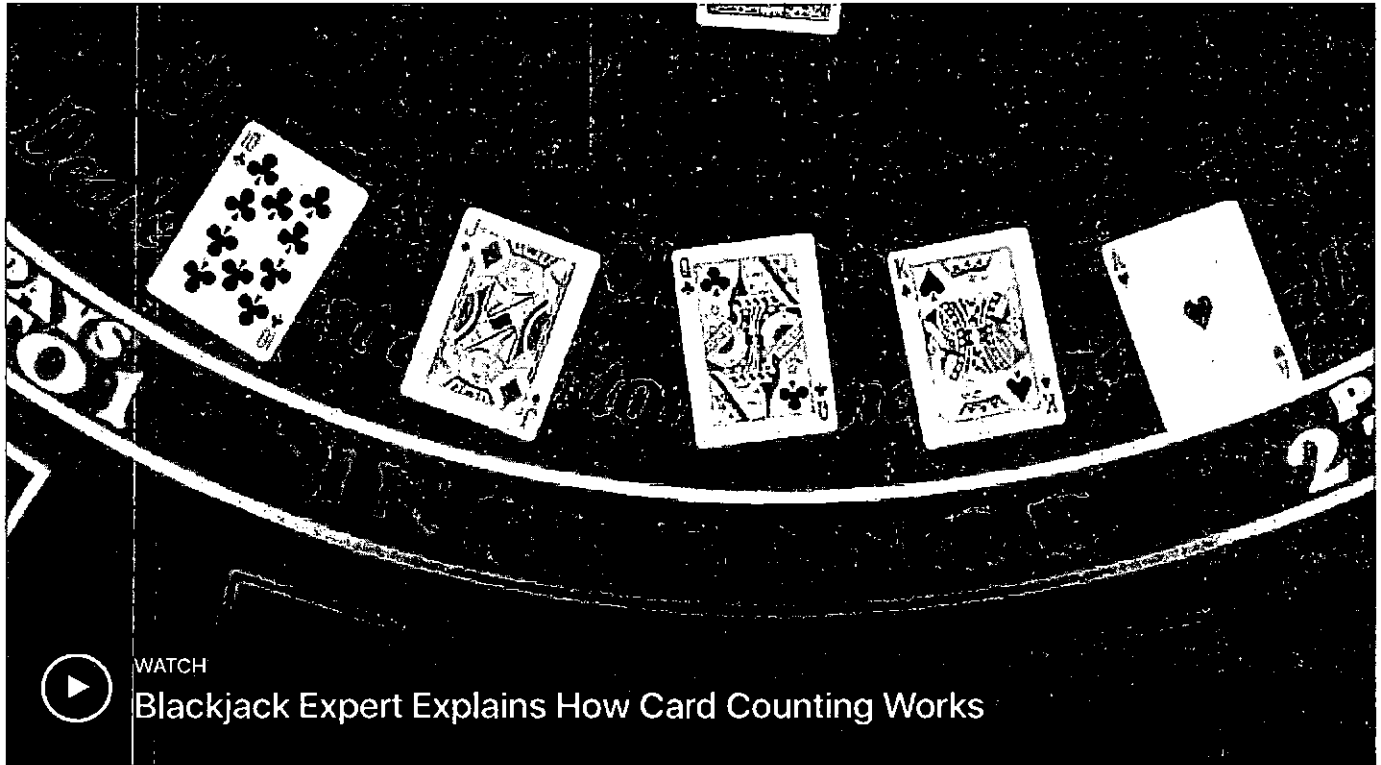
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[Brendan J. Koerner \(@brendankoerner\)](#) is a contributing editor at WIRED and the author, most recently, of *The Skies Belong to Us: Love and Terror in the Golden Age of Hijacking*.

CONTRIBUTING EDITOR

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## **EXHIBIT 2**

Declaration of Heather Ebert ["Ebert Decl."]

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SACRAMENTO**

**Michael Postle**, an individual;  
  
Plaintiff,  
  
vs.  
  
**Veronica Brill**, an individual; **ESPN, Inc.**, a  
Delaware Corporation; **Joey Ingram**, an  
individual; **Haralabos Voulgaris**, an individual;  
**Daniel Negreanu**, an individual; **Upswing Poker,**  
**Inc.**, a Nevada Corporation; **iBus Media Limited**  
**d/b/a "PokerNews"**, and Isle of Man, United  
Kingdom Private Limited Liability Company  
Parent; **Jonathan Little Holdings LLC, d/b/a**  
**"Poker Coaching"**, a Nevada Limited Liability  
Company; **Solve For Why Academy LLC**, a  
Nevada Limited Liability Company; **Todd**  
**Witteles**, an individual; **Run It Once, Inc.**, a  
Nevada Corporation; and **DOES 1** through **1,000**,  
inclusive;  
  
Defendants.

Case No. 34-2020-00286265

**DECLARATION OF HEATHER  
EBERT IN SUPPORT OF ANTI-  
SLAPP SPECIAL MOTION TO  
STRIKE COMPLAINT UNDER Cal.  
CODE CIV. PROC. § 425.16**

Action Filed: 10/01/2020  
Trial Date: Not yet set

1 I, Heather Ebert, declare:

2 1. I am over 18 years of age and have never been convicted of a crime involving fraud  
3 or dishonesty.

4 2. The facts set forth in this Declaration are within my personal knowledge and are  
5 true and correct to the best of my knowledge and belief.

6 3. I am a legal assistant for Randazza Legal Group, PLLC (“RLG”).

7 4. On January 5, 2021, while at the Las Vegas office of RLG, I accessed the URL  
8 <<https://www.wired.com/story/stones-poker-cheating-scandal/>> on a MacBook Air personal  
9 computer using the macOS Mojave operating system and the Google Chrome Internet browser.  
10 Immediately after visiting this URL, I saved a true and correct copy of the web page to PDF format,  
11 a copy of which is attached to Defendant Veronica Brill’s Notice of Motion and Special Motion  
12 to Strike Plaintiff’s Complaint Under Cal. Code Civ. Proc. § 425.16 as **Exhibit 1**.

13 5. On January 5, 2021, while at the Las Vegas office of RLG, I accessed the URL  
14 <<https://www.youtube.com/watch?v=uuWuc4hHT-w>> on a MacBook Air personal computer  
15 using the macOS Mojave operating system and the Google Chrome Internet browser. Immediately  
16 after visiting this URL, I saved a true and correct copy of the web page to PDF format, a copy of  
17 which is attached to Defendant Veronica Brill’s Notice of Motion and Special Motion to Strike  
18 Plaintiff’s Complaint Under Cal. Code Civ. Proc. § 425.16 as **Exhibit 3**.

19 6. I watched the video at this url and personally observed the following exchange  
20 between Mike Postle and Justin Kuraitis from the 4 minute 20 second mark of the video to the 4  
21 minute 44 second mark of the video:

22 **Kuraitis:** “I mean, who wouldn’t want to know the thought process of a poker player that is  
23 running like a freaking god. They nicknamed you in previous streams ‘Mike Jesus Postle,’  
24 ‘G.O.D.’, it’s like – I think it’s the other way, I think you may have sold your soul to the devil.”

25 **Postle:** “I am running like Zeus right now.”

26 7. On January 5, 2021, while at the Las Vegas office of RLG, I accessed the URL  
27 <<https://www.youtube.com/watch?v=9L6DueV9aHc>> on a MacBook Air personal computer



1 using the macOS Mojave operating system and the Google Chrome Internet browser. Immediately  
2 after visiting this URL, I saved a true and correct copy of the web page to PDF format, a copy of  
3 which is attached to Defendant Veronica Brill's Notice of Motion and Special Motion to Strike  
4 Plaintiff's Complaint Under Cal. Code Civ. Proc. § 425.16 as **Exhibit 4**.

5 8. On January 5, 2021, while at the Las Vegas office of RLG, I accessed the URL  
6 <[https://www.youtube.com/watch?v=-hPmOpd\\_wBs](https://www.youtube.com/watch?v=-hPmOpd_wBs)> on a MacBook Air personal computer  
7 using the macOS Mojave operating system and the Google Chrome Internet browser. Immediately  
8 after visiting this URL, I saved a true and correct copy of the web page to PDF format, a copy of  
9 which is attached to Defendant Veronica Brill's Notice of Motion and Special Motion to Strike  
10 Plaintiff's Complaint Under Cal. Code Civ. Proc. § 425.16 as **Exhibit 5**.

11

12 I declare under penalty of perjury that the foregoing is true and correct.

13

14 Dated: January 6, 2021.

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Heather Ebert

## **EXHIBIT 3**

Mike Postle Interview with Justin Kuraitis 1-23-2019 (Jan. 4, 2019).

Available at:

<https://www.youtube.com/watch?v=uuWuc4hHT-w>.



# Mike Postle Interview with Justin Kuraitis 1-23-2019

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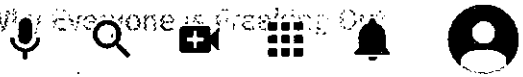
**#6 MIKE POSTLE INTERVIEW W/ MIKE MATUSOW PART 2 INVESTIGATION**



joeingram1  
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SHOCKING POKER CHEATING: Why Everyone is Freaking Out About Mike Postle



Doug Polk Poker  
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CrushlivePoker  
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**Mike Postle FRANTICALLY PANICS As The Scam Falls Apart**  
Doug Polk Poker  
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**Warren Buffett & Jay - Z - Billionaire Investing Secrets (Interview with Forbes)**  
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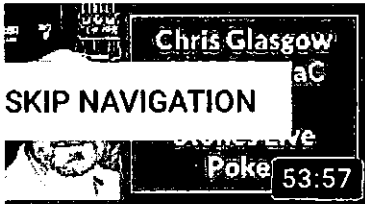
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**Veronica The Mike Postle Whistleblower Joins Me!**  
joeingram1  
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**Chris Glasgow AKA MastaC talks about his time on stones live poker doing commentary**  
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Doug Polk Poker ✓  
271K views • 1 year ago



**TOP 10 SHADY Mike Postle Hands**

Jeff Boski  
272K views • 1 year ago



**STUNNING TWIST In The Postle Investigation (With Matt Berkey)**

Doug Polk Poker ✓  
232K views • Streamed 1 year ago

**WPT Action!**

World Poker Tour  
1.6K watching

**LIVE NOW**

**He KNEW Mike Postle Was Up To Something | (Jaman Burton)**

joeingram1  
88K views • Streamed 1 year ago

**How to Run Deep in Online Tournaments [MTT's]**

Jonathan Little - Poker Coaching  
88K views • Streamed 7 months ago

**#4 INVESTIGATION MIKE POSTLE CHEATING SCANDAL STONES LIVE**

joeingram1  
71K views • Streamed 1 year ago

**Mike Postle CHEATING?**

Jeff Boski  
137K views • 1 year ago

Malcolm X Interview At Berkeley (1962)

## **EXHIBIT 4**

Screenshot of “Avoid Mike Postle: Crazy 1/3 No-Limit game at Stones Gambling Hall” (Nov. 26, 2018).

Available at: <https://www.youtube.com/watch?v=9L6DueV9aHc>



# Avoid Mike Postle: Crazy 1/3 No-Limit game at Stones Gambling Hall

121,102 views • Nov 26, 2018

1.5K 92 SHARE SAVE



**Jaman Burton**  
34.9K subscribers

**SUBSCRIBE**

The exciting conclusion to my latest trip to Stones Gambling Hall.

Support the Vlog: <https://www.patreon.com/thedrawingdead>

SHOW MORE

SKIP NAVIGATION



The Official World Series of Po...

Ad PlayWSOP.com

PLAY NOW

Up next

AUTOPLAY



Mike Postle FRANTICALLY PANICS As The Scam Falls Apart

Doug Polk Poker

1.1M views • 1 year ago



S4:E9 5/10 Poker in Vegas including the BIGGEST POT I've ever vlogged

Jaman Burton

44K views • 1 year ago



#6 MIKE POSTLE INTERVIEW W/ MIKE MATUSOW PART 2 INVESTIGATION

joeingram1

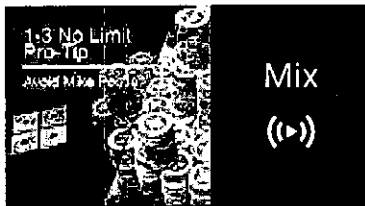
162K views • Streamed 1 year ago



He KNEW Mike Postle Was Up To Something | (Jaman Burton)

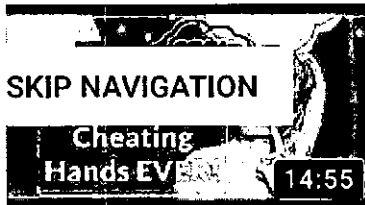
joeingram1

88K views • Streamed 1 year ago



Mix - Jaman Burton

YouTube



The two WORST cheating hands!!

Veronica Brill

36K views • 6 months ago



Massive BLUFF for a \$5,000 Pot!

RampagePoker





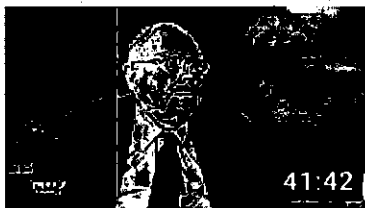
### SHOCKING POKER CHEATING: Why Everyone Is Freaking Out About Mike Postle

Doug Polk Poker ✓  
2.4M views • 1 year ago



### Crushing the VLogger's Game w/ Neeme & Friends @ Stones Gambling Hall | Poker VLOG 25

JohnnieVibes  
94K views • 2 years ago



### Charlie Munger's advice on investing and life choices that make a person wealthy

Yahoo Finance ✓  
1.1M views • 1 year ago



### Mike Postle CHEATING?

Jeff Boski  
137K views • 1 year ago

### TOP 10 SHADY Mike Postle Hands

Jeff Boski  
272K views • 1 year ago

### How to Run Deep in Online Tournaments [MTT's]

Jonathan Little - Poker Coaching  
88K views • Streamed 7 months ago

### WPT Action!

World Poker Tour  
2K watching

**LIVE NOW**

### Flopping the NUTS and Getting RAISED at the Bellagio! (Part 1)

Alex Duvall  
13K views • 2 weeks ago

## **EXHIBIT 5**

Screenshot of “God Mode (or Cheating?) by Mike Postle in a \$5/\$10 Cash Game” (June 6, 2019). Available at: [https://www.youtube.com/watch?v=-hPmOpd\\_wBs](https://www.youtube.com/watch?v=-hPmOpd_wBs)



# God Mode (or Cheating?) by Mike Postle in a \$5/\$10 Cash Game

89,713 views • Jun 6, 2019

1K 92 SHARE SAVE ...



**Jonathan Little - Poker Coaching**  
77.7K subscribers

**SUBSCRIBE**

How would you do playing against Mike Postle? Check out this NEW QUIZ to find out!  
How to Beat Mike Postle QUIZ: <https://pokercoaching.com/poker-quizz...>

SHOW MORE

Up next

AUTOPLAY

SKIP NAVIGATION

## NEW EVIDENCE In Mike Postle Investigation

Doug Polk Poker   
378K views • Streamed 1 year ago





Mike Postle FRANTICALLY RAISES As The Scam Falls Apart



1.1M views • 1 year ago



**\$20,000,000 Lawsuit against Poker Cheat, Mike Postle - Interview with Lawyer, Mac VerStandig!**

Jonathan Little - Poker Coaching  
68K views • 1 year ago



**Playing AK vs a Limper [LIVE CASH GAME STRATEGY]**

Jonathan Little - Poker Coaching  
19K views • 10 months ago



**Mix - Jonathan Little - Poker Coaching**  
YouTube



**3 Lessons to CRUSH Small Stakes Cash Games**

Jonathan Little - Poker Coaching  
325K views • 1 year ago



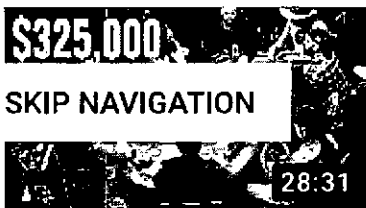
**Weekly Poker Hand, Episode 249: A nearly nut-low hand decides to get frisky on the river**

Jonathan Little - Poker Coaching  
5.1K views • 1 year ago



**#6 MIKE POSTLE INTERVIEW W/ MIKE MATUSOW PART 2 INVESTIGATION**

joeingram1  
162K views • Streamed 1 year ago



**SHOCKING POKER CHEATING: Why Everyone Is Freaking Out About Mike Postle**

Doug Polk Poker  
2.4M views • 1 year ago



**An Optimistic Bluff at Stones Gambling Hall**

Jonathan Little - Poker Coaching  
5.3K views • 1 year ago



**Veronica The Mike Postle Whistleblower Joins Me!**

joeingram1

147K views • Streamed 1 year ago

**TOP 10 SHADY Mike Postle Hands**

Jeff Boski

272K views • 1 year ago

**Mastering the Fundamentals: Preflop Strategy**

Jonathan Little - Poker Coaching

124K views • 5 months ago

**HIGH STAKES POKER | DWAN is BACK!**

Jonathan Little - Poker Coaching

50K views • 1 week ago

**UNBELIEVABLE Poker Instincts! How Does He Know???**

Doug Polk Poker

154K views • 1 year ago

**#7 (CLEAR EVIDENCE) CHEATING IS BORN? + New Results For Mike Postle**

joeingram1

284K views • 1 year ago

**#5 MIKE POSTLE INTERVIEW W/ MIKE MATUSOW INVESTIGATION**

joeingram1

146K views • Streamed 1 year ago

**How to Beat Small Stakes Poker AND Move UP!**

Jonathan Little - Poker Coaching

26K views • Streamed 2 weeks ago

**EXHIBIT 6**

Declaration of Veronica Brill

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SACRAMENTO**

**Michael Postle, an individual;**  
**Plaintiff,**

**vs.**

**Veronica Brill, an individual; ESPN, Inc., a  
Delaware Corporation; Joey Ingram, an  
individual; Haralabos Voulgaris, an individual;  
Daniel Negreanu, an individual; Upswing Poker,  
Inc., a Nevada Corporation; iBus Media Limited  
d/b/a "PokerNews", and Isle of Man, United  
Kingdom Private Limited Liability Company  
Parent; Jonathan Little Holdings LLC, d/b/a  
"Poker Coaching", a Nevada Limited Liability  
Company; Solve For Why Academy LLC, a  
Nevada Limited Liability Company; Todd  
Witteles, an individual; Run It Once, Inc., a  
Nevada Corporation; and DOES 1 through 1,000,  
inclusive;**

**Defendants.**

Case No. 34-2020-00286265

**DECLARATION OF VERONICA  
BRILL IN SUPPORT OF ANTI-  
SLAPP SPECIAL MOTION TO  
STRIKE COMPLAINT UNDER Cal.  
CODE CIV. PROC. § 425.16**

Action Filed: 10/01/2020  
Trial Date: Not yet set

1 I, Veronica Brill, declare:

2 1. I am over 18 years of age and have never been convicted of a crime involving fraud  
3 or dishonesty. I have first-hand knowledge of the facts set forth herein, and if called as a witness  
4 could and would testify competently thereto.

5 2. I am a defendant in this matter.

6 3. I am a professional poker player and in 2018 and 2019 I regularly hosted Stones  
7 Live poker games run by Stones Hall.

8 4. I am intimately familiar with Plaintiff Michael Postle’s play style and his win  
9 record. I have played several poker games with Postle personally, and I have reviewed and  
10 analyzed footage of his play during several other poker games.

11 5. The prevailing theory of play among professional poker players is called game  
12 theory optimal (“GTO”). GTO is a theory stating that, for each possible scenario in a poker game,  
13 there is a decision that will maximize a player’s winnings over time.

14 6. Due to the inherent randomness of poker, a player utilizing GTO perfectly could  
15 still lose an individual game, but on average a player using it over the course of several games is  
16 nearly guaranteed to turn a profit.

17 7. I am familiar with GTO and utilize it myself. Becoming skilled at GTO requires  
18 hundreds of hours of study and practice of all possible card and hand combinations and which play  
19 is best at any given time.

20 8. From June 2018 to September 2019, Plaintiff’s style of playing poker bore none of  
21 the hallmarks of GTO; he regularly made decisions that appeared capricious and unnecessarily  
22 risky, and made little sense when viewed through a statistical lens.

23 9. From July 2018 to September 2019, Plaintiff net winnings in 94% of Stones Live  
24 games, despite each game being of fixed duration and elevated variance compared to normal poker  
25 games.

26 10. Plaintiff averaged a profit of more than 60 “big blinds per hour,” a metric used by  
27 professional poker players to track winnings, adjusting for the different stakes of various games.



1 For context, 5 big blinds per hour is something to which professional players should aspire, and  
2 25 big blinds per hour is incredibly rare and shows performance far beyond almost any other  
3 professional player.

4 11. Plaintiff's win record placed him in a league of his own; this statistic would make  
5 Plaintiff one of the best poker players of all time.

6 12. Plaintiff's success in any individual game could be attributed to good luck or skill  
7 at reading his opponents, but not such consistent success over more than a year.

8 13. As a repeat host of Stones Live games, I am aware that Stones Live games are  
9 broadcast to its audience on a 30-minute delay. Stones Hall uses radio frequency identification  
10 ("RFID") reader scanner technology that allows it to keep track of the position of all players' cards,  
11 and broadcasts this information as part of its stream to allow viewers to better understand what is  
12 happening during a game.

13 14. Stones Hall, as the operator of Stones Live games, has all this information available  
14 to it in real time, without a delay, and has the ability to transmit this live feed to third parties.

15 15. I personally observed that Plaintiff had a regular habit of bringing his phone to  
16 Stones Live games and looking at its screen while playing, but placing the phone such that no other  
17 players or cameras could view it.

18 16. I observed that Plaintiff almost never continued playing after a broadcast ended,  
19 despite other players regularly doing this, and Plaintiff rarely played in games not hosted by Stones  
20 Hall, even though many of them provided larger potential payouts.

21 17. Considering this suspicious behavior and the inexplicable nature of Plaintiff's  
22 success with seemingly sub-optimal play, I concluded there was a chance that someone in Stones  
23 Hall was providing Plaintiff with a non-delayed live stream of Stones Live games, thus allowing  
24 him to see the cards other players had in their hand, giving him a significant advantage, i.e.,  
25 cheating.

26 18. I was further convinced of this because, in the Stones Live Poker sessions where  
27 Plaintiff played poorly, he did not habitually stare at his lap, tended to keep his cell phone in plain

1 view, and evidenced the sort of mediocre poker analytical and decision-making skills indicative of  
2 an average or below-average player.

3 19. In March 2019, I spoke with Justin Kuraitis, the Stones Hall employee in charge of  
4 the live-stream production of Stones Live at Stones Hall, about my suspicions of Plaintiff cheating.

5 20. I am aware other professional poker players around this time also had suspicions  
6 that Plaintiff was cheating and voiced these suspicions to Stones Hall.

7 21. Prior to September 2019, I spoke with Kasey Mills, a professional poker player,  
8 who told me that in March 2019 she also spoke with Kuraitis and told him she suspected Plaintiff  
9 of cheating.

10 22. Prior to September 2019, I spoke with Andrew Barber, a professional poker player,  
11 who told me that he had multiple conversations with Kuraitis about the possibility of Plaintiff  
12 cheating during Stones Live games.

13 23. Prior to September 2019, I spoke with Bart Hanson, a professional poker player,  
14 who told me he spoke with Kuraitis about increasing Stones Hall security due to allegations of  
15 potential cheating by Plaintiff.

16 24. Stones Hall claimed that it performed an investigation following these complaints  
17 and that it concluded Plaintiff was not cheating.

18 25. This statement did not settle the matter for me, because I suspected that Stones Hall  
19 itself was allowing Plaintiff to cheat, and so an internal investigation exonerating itself was of little  
20 relevance. Indeed, Plaintiff's apparent cheating continued unabated up through September 2019.

21 26. Plaintiff's cheating was especially apparent during a Stones Live Pot Limit Omaha<sup>1</sup>  
22 game in May 2019. During a particular hand, in which only 2 of each player's 4 Hole Cards were  
23 captured by the RFID table, Plaintiff can be seen repeatedly looking at his cell phone under the  
24 table and trying to spread all 4 of his Hole Cards over the RFID table's sensor, in a deliberate and  
25 highly unusual manner. His demeanor throughout the hand is exceedingly strange, and it is

26 \_\_\_\_\_  
27 <sup>1</sup> Pot Limit Omaha, or "PLO," is a game in which players are dealt 4 Hole Cards. In contrast,  
during Texas hold 'em, the predominant game on Stones Live Poker, players are only dealt 2 cards.

1 apparent this technical malfunction (which, in turn, denied him the ability to play the hand with  
2 knowledge of his opponents' Hole Cards) is distressing to Plaintiff. This is so even though the  
3 malfunction is one of which Plaintiff could have no real-time knowledge unless he was cheating.

4 27. Following the above hand during the May 2019 game, Plaintiff was interviewed by  
5 a commentator and asked, "so what happened on that PLO hand where it only showed two of our  
6 cards?" Plaintiff could not have known about this technical malfunction unless he was cheating  
7 by watching a non-delayed live stream of the game. The fact that he asked the question  
8 immediately afterward shows that he had access to a non-delayed stream.

9 28. Since beginning to play in Stones Hall games in June 2018, Plaintiff almost  
10 exclusively played paid cash poker games with Stones Hall and almost never continued playing  
11 after the broadcast ended, despite it being common for players to continue to play after a broadcast  
12 ends. Plaintiff was not known to have played with much frequency in other poker games, streamed  
13 or unstreamed, despite many of them providing larger potential payouts than Stones Hall.

14 29. Unless Plaintiff was cheating with the assistance of Stones Hall, this behavior  
15 seemed extremely strange. If Plaintiff was actually as good as he appeared, there would be no  
16 reason for him to decline to play in games that were not being live streamed by Stones Live.

17 30. During a September 21, 2019 Stones Live game in which Plaintiff played, I  
18 observed that he frequently stared at his cell phone such that no one else could view his screen.  
19 Like in other games where I suspected him of cheating, he made decisions that defied all  
20 conventional wisdom of the professional poker community and yet did very well for himself.

21 31. By this point, I was completely convinced that the only possible explanation for  
22 Plaintiff's success was that he cheated. I also knew that Stones Hall would do nothing to stop him  
23 from cheating. Thus, the only way to stop Plaintiff's cheating was to let the professional poker  
24 community know about it by publishing my suspicions online.

25 32. On September 28, 2019, I published 9 tweets on my Twitter account, all in the same  
26 thread. True and accurate copies of these tweets are attached to this Declaration as **Exhibit A**.

27

1           33.     In these tweets, I was providing my opinion, based on my observations of Plaintiff's  
2 play during several Stones Live games and other observations noted above. I made it abundantly  
3 clear that I was providing my opinion, and was not stating with absolute certainty that Plaintiff had  
4 cheated or by what method he was cheating. Nevertheless, I was at the time, and still am today,  
5 convinced that Plaintiff was cheating during Stones Live games.

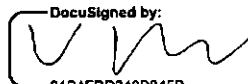
6           34.     I published these statements to inform the professional poker community about  
7 Plaintiff's cheating in the hope that this information would stop a habitual cheater and return some  
8 respect to the community. I did not publish these statements as part of any personal grudge or  
9 dispute with Plaintiff.

10          35.     I am personally aware that Stones Hall and its employees regularly created and  
11 displayed significant promotional material for Plaintiff, speaking of how prominent, skilled, and  
12 dominant a player he was. A few examples of such promotional material are attached to this  
13 Declaration as **Exhibit B**.

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I declare under penalty of perjury that the foregoing is true and correct.

Dated: 1/6/2021

DocuSigned by:  
  
0184FDD248B045B  
Veronica Brill

## **EXHIBIT A**

Tweets by Veronica Brill published on September 28, 2019



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Thread



Veronica Brill @Angry\_Polak

If someone is displaying a probability of cheating on a live stream you don't make the entire room not be able to use their cellphones in an attempt to reduce everyone's anxiety and then still promote the player as one of the best.

11:33 AM · Sep 28, 2019 · Twitter for Android

11 Retweets 11 Quote Tweets 476 Likes



Veronica Brill @Angry\_Polak · Sep 28, 2019  
Replying to @Angry\_Polak

You take that player off the stream while you launch a proper, objective, investigation done by a third-party. Once it's shown that the player has not been cheating you make your investigation public and let the player back onto the stream.



5



79



Veronica Brill @Angry\_Polak · Sep 28, 2019  
Am I sure that this player is cheating? No. Do I think that there is a greater than zero % chance that he is? Yes  
Have numerous professional poker players voiced their concerns to me regarding this player? Yes.



2



1



79



Veronica Brill @Angry\_Polak · Sep 28, 2019  
Also, I brought up my concerns about this player months ago to the person running the live stream. I was told that no one gets this player and that he is just better than everyone. Also that they had some one or some company come in to check their security



3



63



Veronica Brill @Angry\_Polak · Sep 28, 2019  
Apparently that didn't help because no one is allowed to have a cellphone while playing even off stream. The thing is that it doesn't take a cell phone to cheat. There could easily be a small device on his leg that lets him know when he's ahead. I'm just speculating at this point



4



59



Veronica Brill @Angry\_Polak · Sep 28, 2019  
I want to say that off stream he's a nice guy and has always played in my game. I wanted to take him off my line up last year because of suspicions but was assured by the guy running the stream that he wasn't cheating. All the videos are up. You can decide for yourself



3



1



51



Veronica Brill @Angry\_Polak · Sep 28, 2019  
I feel that with such a high vpi and play style, if we run the SIM a hundred times with players of equal competency he's running in the 95th percentile of results



5



Messages



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Relevant

Veronica Brill @Angry\_Polak  
Be ar RI ch BI

What's hot

US election: Georgia S line up at the state

Music · Trending The Week 41.5K Tweets

Hip hop · Trending Kanye 24.8K Tweets

COVID-19 · Trending COVID-19 for Nevada

US news · Trending No officer the shoot Kenosha

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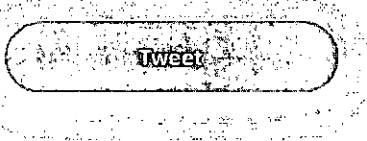
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Veronica Brill @Angry\_Polak · Sep 28, 2019

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Mike Postle on Stones Live  
Compilation of hands  
youtube.com

11 4 61



Veronica Brill @Angry\_Polak · Sep 28, 2019

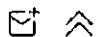
youtu.be/BATKzg3Wu0I  
Someone DMed me to remind me of this one



Battle of the Ace Highs for \$8k+ 3/14/19  
We invite you to join us for our broadcasts on  
Monday's Wednesday's and Saturday's from ...  
youtube.com

16 1 32

Messages



**EXHIBIT B**

Stones Hall Promotional Material for Plaintiff



**Mike "Get There" Postle**

HIS BESTSELLING CLASSIC



**THE POWER OF  
POSTLE  
THINKING**

---

**A PRACTICAL GUIDE  
TO CRUSHING SOULS  
AND RUNNING PURE**

