

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-----X
UNITED STATES OF AMERICA,

Plaintiff,

11 Cv. 2564 (LBS)

- v. -

POKERSTARS; FULL TILT POKER;
ABSOLUTE POKER; ULTIMATE BET;
OLDFORD GROUP LTD.; RATIONAL
ENTERTAINMENT ENTERPRISES LTD.;
PYR SOFTWARE LTD.; STELEKRAM LTD.;
SPHENE INTERNATIONAL LTD.;
TILTWARE LLC; KOLYMA CORPORATION
A.V.V.; POCKET KINGS LTD.; POCKET
KINGS CONSULTING LTD.; FILCO LTD.;
VANTAGE LTD.; RANSTON LTD.; MAIL
MEDIA LTD.; FULL TILT POKER LTD.;
SGS SYSTEMS INC.; TRUST SERVICES
LTD; FIDUCIA EXCHANGE LTD.; BLUE
WATER SERVICES LTD.; ABSOLUTE
ENTERTAINMENT, S.A.; and BLANCA
GAMES, INC. OF ANTIGUA; RAYMOND
BITAR; HOWARD LEDERER;
CHRISTOPHER FERGUSON, a/k/a
"JESUS;" and RAFAEL FURST.

Defendants;

**VERIFIED CLAIM OF
RAYMOND BITAR
PURSUANT TO RULE G OF
THE SUPPLEMENTAL RULES
FOR ADMIRALTY AND
MARITIME CLAIMS**

ALL RIGHT, TITLE AND INTEREST IN
THE ASSETS OF POKERSTARS; FULL
TILT POKER; ABSOLUTE POKER;
ULTIMATE BET; OLDFORD GROUP LTD.;
RATIONAL ENTERTAINMENT ENTERPRISES
LTD.; PYR SOFTWARE LTD.; STELEKRAM
LTD.; SPHENE INTERNATIONAL LTD.;
TILTWARE LLC; KOLYMA CORPORATION
A.V.V.; POCKET KINGS LTD.; POCKET
KINGS CONSULTING LTD.; FILCO LTD.;
VANTAGE LTD.; RANSTON LTD.; MAIL
MEDIA LTD.; FULL TILT POKER LTD.;
SGS SYSTEMS INC.; TRUST SERVICES
LTD; FIDUCIA EXCHANGE LTD.; BLUE
WATER SERVICES LTD.; ABSOLUTE
ENTERTAINMENT, S.A.; and BLANCA
GAMES, INC. OF ANTIGUA; INCLUDING

JOHN O'CONNOR
168 PEMBROKE ROAD,
BALLSBRIDGE, DUBLIN 4.
Notary Public for the County & City of Dublin
Ireland
Commissioned for Life

1
BB

JM



BUT NOT LIMITED TO THE PROPERTIES LISTED IN SCHEDULE A, SUCH AS BUT NOT LIMITED TO THE DOMAIN NAMES POKERSTARS.COM; FULLTILTPOKER.COM; ABSOLUTEPOKER.COM; ULTIMATEBET.COM; and UB.COM; ALL RIGHT, TITLE, AND INTEREST IN THE PROPERTIES LISTED IN SCHEDULE B; and ALL RIGHT, TITLE, AND INTEREST IN THE PROPERTIES LISTED IN SCHEDULE C,

Defendants-in-rem

-----X

RAYMOND BITAR, hereinafter Claimant, being duly sworn, deposes and states under penalty of perjury:

1. The facts stated in this Petition are true to my own knowledge. I hereby make claim to the following assets, which have been restrained, seized and referenced in the Verified Amended Complaint ("Complaint") of Plaintiff United States of America (hereinafter "the Government").

2. Specifically, I have legal and equitable ownership interests in various companies (set out in the Government's First Amended Complaint) in varying percentages including ownership interests in Full Tilt Ltd. and Tiltware LLC. I also claim ownership in the domain names of such entities, which the government seeks to forfeit.

3. In addition to my ownership interest in the companies listed in the preceding paragraph, I have legal and equitable ownership interests in the bank accounts of those companies as well as a bank account in my name, as set out in the Exhibits to the Government's First Amended Complaint and incorporated by reference herein, including, but not limited to the following bank accounts:

- a. account numbered 1892947126 held at Comerica Bank, Dallas, Texas in the name of Tiltware, and all funds traceable
- b. account numbered 1892947134 held at Comerica Bank, Dallas, Texas, in the name of Tiltware, and all funds traceable thereto; and

2

JOHN O'CONNOR
168 PEMBROKE ROAD,
BALLSBRIDGE, DUBLIN 4.
Notary Public for the County & City of Dublin
Ireland
Commissioned for Life

RB

Jo



c. Account numbered GB81 RBOS 6095 4234 0877 66 held at NatWest, in the name of Raymond Bitar, and all funds traceable thereto.

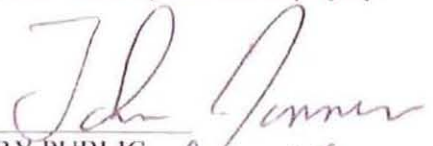
4. My interest in these above-referenced properties is legal and equitable ownership; an ownership interest acquired by my lawful establishment of those entities and my entirely lawful hard work performed for said companies over the years. The assets subject to forfeiture are neither proceeds nor instrumentalities of any crimes in any jurisdiction in the United States or elsewhere.

5. My claim to the specified property is superior to the government's interest in these properties. I dispute the government's forfeiture allegations and I request an opportunity to challenge the government's forfeiture claim; both the factual allegations and legal claims, as contained in the Complaint.

I, RAYMOND BITAR, hereby verify that the foregoing facts are true and correct, and made under penalty of perjury. Based upon the foregoing, I hereby demand restitution of the property described here and the right to file this Claim pursuant to F.R.Crim.P. 32.2.


RAYMOND BITAR

Sworn to before me on this 28th day of September 2011, personally appeared RAYMOND BITAR, who, after presenting the following identification: USA passport, stated the foregoing facts and allegations are true and correct, done under penalties of perjury.


NOTARY PUBLIC,
COMMISSIONER *for life*

JOHN O'CONNOR
168 PEMBROKE ROAD,
BALLSBRIDGE, DUBLIN 4,
Notary Public for the County & City of Dublin
Ireland
Commissioned for Life

