1 Charles McCrea (NV State Bar No. 104) LIONEL SAWYER & COLLINS 2 1700 Bank of America Plaza 300 South Fourth Street 3 Las Vegas, Nevada 89101 Tel 702.383.8981 Fax 702.383.8845 4 cmccrea@lionelsawyer.com 5 James D. Nguyen (CA State Bar No. 179370) Victor de Gyarfas (CA State Bar No. 171950) 6 Uleses C. Henderson, Jr. (CA State Bar No. 225246) Pro Hac Vice Applications To Be Submitted 7 FOLEY & LARDNER LLP 2029 Century Park East, 35th Floor Los Angeles, California 90067-3021 8 9 Tel: 310-277-2223; Fax: 310-557-8475 jnguyen@foley.com 10 uhenderson@foley.com 11 Attorneys for Specially Appearing Defendants **BODOG** ENTERTAINMENT GROUP S.A., 12 and erroneously named Specially Appearing Defendants BODOG.NET 13 and BODOG.COM 14 15 UNITED STATES DISTRICT COURT 16 DISTRICT OF NEVADA 17 FIRST TECHNOLOGY LLC, Case No: 2:06-cv-1110-RLH-GWF Plaintiff, 18 DECLARATION OF MARIO JORGE VS. CHAVEZ SALAS IN SUPPORT OF 19 DEFENDANTS' MOTION TO SET RATIONAL ENTERPRISES LTDA.. ASIDE DEFAULT JUDGMENT RATIONAL POKER SCHOOL 20 LIMITED, BODOG ENTERTAINMENT GROUP S.A. 21 **Date:** October 11, 2007 BODOG.NET, BODOG.COM, AND FUTUREBET SYSTEMS LTD., Time: 9:00 a.m. 22 Courtroom: 6C Defendants. 23 24 25 26 27

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## **DECLARATION OF MARIO JORGE CHAVES SALAS**

I, Mario Jorge Chaves Salas, declare as follows:

- 1. I am a business consultant with Nimroad Consultants in Costa Rica. I am over the age of 18, all of the matters stated within this declaration are within my personal knowledge, and I am fully competent to testify as to all of the matters contained within this declaration.
- 2. I am a Certified Public Accountant in Costa Rica and have worked as a Certified Public Accountant for approximately 20 years.
- 3. In my position with Nimroad Consultants I was Bodog Entertainment Group, S.A.'s external accountant for a period of approximately two years ending in September 2006. As Bodog Entertainment Group, S.A.'s external accountant I obtained knowledge of its operations and finances.
- 4. Bodog Entertainment Group, S.A. effectively shut down operations in September 2006 and has been unregistered as an active tax payer in Costa Rica as a result of discontinuation of operations since September 2006. Bodog Entertainment Group, S.A. provided services including call center data entry and domain management services.
- 5. During my time as Bodog Entertainment Group, S.A.'s external accountant I was aware that Bodog Entertainment Group, S.A. did not operate the Bodog.com, NewBodog.com, or BodogLife.com websites.
- 6. As of September 2006 when Bodog Entertainment Group, S.A. effectively ceased operating, it did not have assets to satisfy a \$46 Million judgment or \$9.3 Million security.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 10th, 2007 at San José, Costa Rica.

Mario Jorge Chaves Salas