

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,,

Plaintiff,

- 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;

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

11 Cv. 2564 (LBS)

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

GAMES, INC. OF ANTIGUA; INCLUDING 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.

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

This amended claim supersedes (and withdraws) the claim dated September 28, 2011 that I previously filed in this action. By this amended claim I hereby make claim only to the following assets that are referenced in the Verified Amended Complaint (“Complaint”) of Plaintiff United States of America (hereinafter “the Government”):

1. My equity ownership interests in the following companies included in the defined term “the Poker Company Defendants:”

- (a) Full Tilt Poker
- (b) Tiltware LLC
- (c) Kolyma Corporation A.V.V.
- (d) Pocket Kings Ltd.
- (e) Pocket Kings Consulting Ltd.
- (f) Filco Ltd.
- (g) Vantage Ltd.


2. The contents of the following bank:

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


3. 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.

4. 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 9 day of July 2012, personally appeared RAYMOND BITAR, who, after presenting the following identification: Drivers License, stated the foregoing facts and allegations are true and correct, done under penalties of perjury.


NOTARY PUBLIC
JOHN F. BAUGHMAN
Notary Public, State of New York
No. 02BA6239028
Qualified in New York County
Commission Expires Apr. 11, 2015