

# Exhibit A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA,  
:  
Plaintiff,  
:  
- v. - :  
:  
POKERSTARS, et al. :  
Defendants; :  
:  
ALL RIGHT, TITLE AND INTEREST IN :  
THE ASSETS OF POKERSTARS, et al.; :  
Defendants-in-rem. :  
----- x

11 Civ. 2564 (LBS)

**DECLARATION OF JERRY D. BERNSTEIN**

JERRY D. BERNSTEIN, pursuant to the provisions of  
28 U.S.C. § 1746, declares as follows:

1. I am a partner with the law firm Blank Rome LLP.  
In this action, I represent the companies collectively identified  
as the Absolute Poker Settlement Group, as that term is defined  
in the memorandum in support of the Government's motion for (1)  
the entrance of the proposed stipulated order of settlement  
between the Government and the Absolute Poker Settlement Group,  
and (2) an order permitting the United States Marshals Service to  
conduct an interlocutory sale of all assets of the Absolute Poker  
Settlement Group. The information in this declaration is based  
on my own personal knowledge and on information that I have  
obtained from former executives of the Absolute Poker Settlement

Group, as well as Canadian counsel for the Absolute Poker Settlement Group.

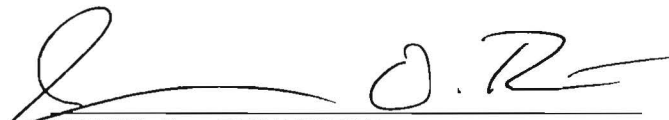
2. On or about April 16, 2011, all deposits and withdrawals relating to U.S. located customers of the Absolute Poker Settlement Group and related entities (collectively "Absolute Poker"), were terminated. In or about May 2011, Absolute Poker began to block all non-U.S. customers from withdrawing any money that had been deposited before April 15, 2011. Between July 15 and July 30, 2011, Absolute Poker terminated all deposits and withdrawals for all players, regardless of location.

3. On or about June 2, 2012, Absolute Poker's license with the Kahnawake Gaming Commission expired. The Absolute Poker sites, including the sites affiliated with the domains absolutepoker.com, ub.com, absolutepoker.eu, and ubpoker.eu were shut down entirely, as were the servers supporting the Absolute Poker online poker platform. From that point on, any player in the world accessing the Absolute Poker sites could not play any games through the platform, whether for "real money" or not, access his or her account, or do anything else other than view the inactive site. The hosting cost of keeping the servers in operation past that date would have been approximately \$100,000 per month.

4. In June 2012, I communicated with Leonard Rodes, counsel for Avoine - Servico De Consultadoria E Marketing, LDA ("Avoine") regarding the discovery requests directed to Blanca Games, Inc., SGS Systems Inc., Trust Services Ltd., Fiducia Exchange Ltd, Blue Water Services Ltd., and Absolute Entertainment, S.A., that he served upon me in my capacity as counsel in this matter. Counsel for Avoine has never sought a "meet and confer" regarding his discovery demands. In fact, when I discussed the discovery demands with counsel for Avoine, he advised that I could put them aside for future discussion. That discussion has not occurred.

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

Dated: New York, New York  
September 21, 2012

A handwritten signature in black ink, appearing to read "J.D. Bernstein", written over a horizontal line.

JERRY D. BERNSTEIN  
COUNSEL FOR THE ABSOLUTE POKER  
SETTLEMENT GROUP