

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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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;

and

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

Case No.: 11-Civ-2564 (LBS)

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.
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**CLAIM IN FORFEITURE PROCEEDING PURSUANT TO
SUPPLEMENTAL RULE G(5) FOR ADMIRALTY OR MARITIME AND
ASSET FORFEITURE ACTIONS**

Dated: October 19, 2011

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP

Lawrence P. Kolker
Thomas H. Burt
Beth A. Landes
270 Madison Avenue
New York, New York 10016
Telephone: 212-545-4600
Facsimile: 212-545-4653

Steve Segal, hereinafter referred to as "Claimant", states:

1. I am one of the named plaintiffs in the civil class action *Segal v. Bitar*, No. 11-Civ-4521 (LBS) (S.D.N.Y. June 30, 2011) and represent a putative class of U.S. residents, who held balances in the Full Tilt Player Accounts ("Player Accounts") on April 15th, 2011, (the "Class" or "Claimants") the day that access to the Player Accounts was first denied. In that

action, the Class seeks the return of the \$150 million contained in the Player Accounts from certain individuals who are named in this action.

2. Pursuant to 18 U.S.C. §983(a)(4) and Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, I, on the behalf of the Class, assert their right, title and interest in the property listed at Schedule C of the Government's First Verified Amended Complaint¹ ("Amended Compl.") and contest the forfeiture of that property, which contains, as the Government has alleged, the Class Members' funds.²

3. The Class hereby lays claim to the U.S. Player Account balances held in the properly identified five bank accounts listed in Schedule C to the Amended Complaint, or the funds traceable to the accounts, listed here:

FTP INSIDER ACCOUNTS

(As Alleged in Schedule C to Government's FAC of September 20, 2011)

1. Account numbered GB81 RBOS 6095 4234 0877 66 held at NatWest, in the name of Raymond Bitar, and all funds traceable thereto;
2. Account numbered 7655741861 held at Wells Fargo Bank, N.A., in the name of HH Lederer Consulting LLC, and all funds traceable thereto;
3. Account numbered GB56LOYD30166314010402 held at Lloyds TSB International, Isle of Mann, in the name of Howard Lederer, and all funds traceable thereto;
4. Account numbered 40039049628 held at Citibank, N.A., in the name of Chris Ferguson, and all funds traceable thereto; and
5. Account numbered CH87 0875 5057 0684 0010 0 held at Pictet & Co Bankers, Switzerland, in the name of Telamonian Ajax Trust, and all funds traceable thereto.

4. The Claimants' interest in the property is equitable. Class Members have a rightful and superior interest in the amount of up to \$150 million held or traceable to those accounts. As provided in the Government's First Verified Amended Complaint and as alleged in

¹ See *U.S. v. Pokerstars, et. al*, No. 11-Civ-2564 (LBS) (S.D.N.Y. 2011) ECF No. 53.

² See *Id.* at ¶¶105-106.

the Claimants' Class Action Complaint³, the balance of Claimants' Player Accounts was distributed to the various holders of the accounts listed at Schedule C and/or owners Tiltware LLC. To the extent those funds previously within the Player Accounts remain in one or more of the five bank accounts listed in Schedule C, Class Members lay claim to them.

5. Claimants are innocent victims, who have committed no crime, and therefore their claim is bona fide. As a result, the \$150 million in the Player Accounts on April 15, 2011, should be returned to the Class.

I, Steve Segal, acting as agent for the Class, do hereby declare the foregoing is true to the best of my knowledge and belief under penalty of perjury.

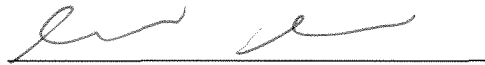

Steve Segal

³ *Segal v. Bitar*, 11 Civ. 4521(LBS) (SDNY, June 30 2011), ECF 1.

VERIFICATION

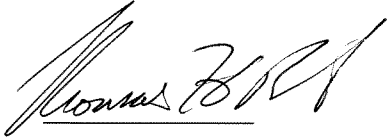
Steve Segal, who is a named plaintiff and filed on behalf of a putative class of U.S. Players that held Player Accounts with Full Tilt, here by declares under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Steve Segal



Sworn to before me this

19th day of October, 2011



Notary Public

THOMAS H. BURT
Notary Public, State of New York
No. 02BU6187371
Qualified in Westchester County
Commission Expires Feb. 17, 2012