

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

-v- :

ANURAG DIKSHIT, : INFORMATION *aco*
: 08 Cr.

Defendant. :

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COUNT ONE

The United States Attorney charges:

BACKGROUND

1. From in or about 1997 through in or about October 2006, PartyGaming PLC, a Gibraltar corporation, and its predecessor and affiliated corporate entities (collectively "PartyGaming"), operated an internet gambling business that offered casino and poker games, among other games of chance, to customers who wished to wager online. At all times relevant to this Information, a substantial majority of PartyGaming's online gambling customers, representing approximately 85 percent of PartyGaming's revenue in 2005, were located in the United States, including in the Southern District of New York

2. Between in or about 1998 and October 2006, ANURAG DIKSHIT, the defendant, developed a proprietary software platform for PartyGaming and directed PartyGaming's computer operations.

3. Beginning in or about 1999, and continuing up to and including October 2006, DIKSHIT was a principal shareholder of PartyGaming. At various times relevant to this Information, DIKSHIT served as a PartyGaming corporate officer and director.

THE OFFENSE

4. From in or about 1998, up through and including in or about October 2006, in the Southern District of New York and elsewhere, ANURAG DIKSHIT, the defendant, being engaged in the business of betting and wagering, unlawfully, willfully and knowingly used a wire communication facility for the transmission in interstate and foreign commerce of bets and wagers on any sporting event and contest, and a wire communication which entitled the recipient to receive money and credit as a result of bets and wagers, and for information assisting in the placing of bets and wagers.

(Title 18 United States Code, Sections 1084 and 2.)

FORFEITURE ALLEGATION

5. As the result of committing the gambling offense alleged in Count One of this Information, ANURAG DIKSHIT shall forfeit to the United States \$300 million dollars in United States currency pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982 and 28 U.S.C. § 2461, constituting property, real and personal, involved in the gambling offense, and property, real and personal, that constitutes or is derived from proceeds traceable to the violation of 18 U.S.C. § 1084.

Substitute Asset Provision

a. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;


(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 982, 1084, and Title 28, United States Code, Section 2461(c)).



LEV L. DASSIN
Acting United States Attorney