

**SUMMONS  
(CITACION JUDICIAL)**

FOR COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)

**FILED**

SUPERIOR COURT of CALIFORNIA  
COUNTY of SANTA BARBARA

**OCT 05 2009**

GARY M. BLAIR, Executive Officer

BY *Meredith A. Jay*  
Meredith A. Jay, Deputy Clerk

**NOTICE TO DEFENDANT:  
(AVISO AL DEMANDADO):**

HIS SERENE HIGHNESS PRINCE ALBERT II OF MONACO, AKA Albert Alexandre Louis Pierre Grimaldi, an individual, and DOES 1 through 100 inclusive

**YOU ARE BEING SUED BY PLAINTIFF:  
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

Robert Eringer

**NOTICE!** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

**¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:  
(El nombre y dirección de la corte es):

Superior Court of the State of California, County of Santa Barbara,  
Anacapa Division, 1100 Anacapa Street, Santa Barbara, CA 93101

CASE NUMBER:  
(Número del Caso) **1339892**

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:  
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Brigham J. Ricks, Ricks Law, P.O. Box 3370, Santa Barbara, CA 93130, (805) 884-9538

DATE:  
(Fecha)

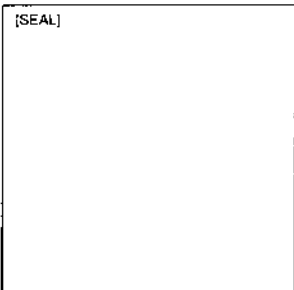
**OCT 05 2009**

Clerk, by  
(Secretario)

**GARY M. BLAIR, EXECUTIVE OFFICER**  
Deputy  
**MEREDITH A. JAY** (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).



**NOTICE TO THE PERSON SERVED:** You are served

- as an individual defendant.
- as the person sued under the fictitious name of (specify):
- on behalf of (specify):  
under:  CCP 416.10 (corporation)  CCP 416.60 (minor)  
 CCP 416.20 (defunct corporation)  CCP 416.70 (conservatee)  
 CCP 416.40 (association or partnership)  CCP 416.90 (authorized person)  
 other (specify):
- by personal delivery on (date):

OCT 05 2009

1 Brigham J. Ricks, Bar No. 224750  
2 **RICKS LAW**  
3 P.O. Box 3370  
Santa Barbara, CA 93130-3370  
(805) 884-9538 FAX (805) 884-9708

GARY M. BLAIR, Executive Officer  
BY Merilee A. [Signature]  
Deputy Clerk

4 Attorney for Plaintiff

5  
6  
7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **FOR THE COUNTY OF SANTA BARBARA, ANACAPA DIVISION**  
9

10 ROBERT ERINGER, an individual, ) Case No.: **1339892**  
11 Plaintiff, )  
12 vs. ) **VERIFIED COMPLAINT**  
13 HIS SERENE HIGHNESS PRINCE ALBERT )  
14 II OF MONACO, AKA Albert Alexandre )  
15 Louis Pierre Grimaldi, an individual, and )  
16 DOES 1 through 100 inclusive, )  
Defendants. )

17  
18 **PLAINTIFF ALLEGES:**

19 **General Allegations**

- 20 1. Plaintiff ROBERT ERINGER ("Eringer") is an individual residing in Santa Barbara,  
21 California and is a party to an agreement to establish and operate an intelligence agency for His  
22 Serene Highness Albert II of Monaco (the "Agreement").  
23 2. Defendant HIS SERENE HIGHNESS PRINCE ALBERT II OF MONACO, AKA Albert  
24 Alexandre Louis Pierre Grimaldi ("HSH"), is an individual residing in the Principality of  
25 Monaco and is a party to the Agreement.  
26 3. The true names and capacities, whether individual, corporate, associate, joint venture,  
27 government or otherwise, of the defendants named under fictitious names DOES 1 through 20,  
28 inclusive, are unknown to plaintiff who therefore sues those defendants by such fictitious names.

1 Plaintiff will ask leave of the Court to amend this complaint and insert the true names and  
2 capacities of those defendants when they have been ascertained. Plaintiff is informed and  
3 believes, and based thereon alleges, that each of the defendants designated as a "DOE" is legally  
4 responsible in some manner for the events and happenings alleged, and that Plaintiff's claims as  
5 alleged were proximately caused by such defendants.

6 4. The Agreement was performed in Santa Barbara, California.

7 **Background Allegations**

8 5. On June 16, 2002, HSH, then Hereditary Prince, retained Eringer, at a meeting in Monaco,  
9 to be his intelligence advisor. HSH never reduced this agreement to writing. In order to prove  
10 the terms of this agreement, Eringer's performance of his obligations thereunder, and HSH's  
11 breach of the agreement, we set forth herein the facts, largely in chronological order, of Eringer's  
12 services to HSH and their interactions. The recitation of facts below is not an exhaustive list of  
13 investigations and services provided by Eringer to HSH, but is a representative sample of the  
14 work performed by Eringer at the behest of HSH.

15 6. HSH told Eringer he needed an intelligence advisor to assist him in rooting out corruption,  
16 money laundering and organized crime in Monaco. As Hereditary Prince, HSH was preparing  
17 for his rule of Monaco as his father was aging. Effective July 1, 2002 Eringer commenced  
18 service to HSH for an agreed remuneration of 60,000 Euros each calendar quarter. At the  
19 beginning of 2003 this payment was increased to 80,000 Euros each calendar quarter. For a  
20 period of two quarters in 2006 this payment was increased to 100,000 Euros, but then later  
21 reduced to 80,000 Euros before finally being reduced to 40,000 Euros per quarter for the last  
22 quarter of 2007 and first quarter of 2008. Attached as Exhibit A are copies of account statements  
23 issued by HSH's Administration des Biens (the French for property manager) for payments made  
24 by HSH to Eringer.

25 7. HSH confirmed Eringer's position by issuing to him the following documents attached as  
26 Exhibit B:

- 27 • A card signed by HSH stating, "Please give Mr. Robert ERINGER your confidential  
28 assistance. He acts on my authority and reports directly to me."

- 1           • A Monaco Intelligence Service card signed by HSH. The identification identifies  
2           Eringer as “Director M.I.S.”

3       7. Eringer’s mission statement in providing intelligence services to HSH states:

- 4           • To investigate individuals and entities about whom HSH has concerns.  
5           • To keep HSH apprised of information, which, as his eyes and ears, would come to  
6           MIS’s attention.  
7           • To create liaison partnerships with the intelligence services of select countries with a  
8           view to solicit expert briefings for HSH.

9       8. Eringer’s service to HSH began with HSH directing Eringer to investigate two individuals:  
10       Philip Zepter and Alexey Fedorichev. In his investigation, Eringer learned that Philip Zepter was  
11       a Serbian resident in Monaco whose company, Zepter International, was headquartered in  
12       Monaco. Ostensibly a manufacturer of kitchen utensils, Eringer determined Zepter to be an  
13       international arms dealer of dubious character. As a result of Eringer’s findings and briefings,  
14       HSH distanced himself from Zepter. In his investigation of Alexey Fedorichev, Eringer learned  
15       he was a Russian resident in Monaco with designs on ASM, Monaco’s football team. The results  
16       of Eringer’s investigation into Fedorichev’s background led HSH to disqualify Fedorichev from  
17       investing in ASM football. (Eringer possesses documents on both investigations.)

18       9. Eringer created liaison relationships with the United States of America Central Intelligence  
19       Agency (“CIA”) and the British Secret Intelligence Service (“SIS”). Due to Eringer’s efforts,  
20       CIA and SIS began to brief HSH in advance of his foreign travels, as requested. These briefings  
21       continued on a regular basis for most of the duration of Eringer’s service, some of which were in  
22       writing. (Eringer possesses documents on this matter.)

23       10. Eringer quickly created a network of paid informants and assets who provided a number  
24       of new leads for investigation, including information on a retired U.S. Air Force colonel whom it  
25       was suspected was involved in Russian money laundering through a company he had helped  
26       found in Monaco. This retired colonel was also suspected of espionage against the United  
27       States. Eringer’s findings eventually led him to arrange for HSH to secretly meet FBI Director  
28



1 Robert Mueller at the J. Edgar Hoover Building in Washington (April 25, 2003). (Eringer  
2 possesses documents on this matter.)

3 11. Eringer counseled HSH against meeting Patric Maugein, reputed to be French President  
4 Jacques Chirac's secret channel to Saddam Hussein and involved in shady oil deals through  
5 Monaco-based companies, at a time when friends of HSH were urging him to meet Maugein on  
6 the basis that he had "great ideas for Monaco." As a result of Eringer's intelligence, HSH  
7 refused to meet Maugein, and potential embarrassment was averted when Maugein was later  
8 exposed in the media for his illicit activities. (Eringer possesses documents on this matter.)

9 12. Eringer counseled HSH to distance himself from Monaco residents Samy Maroun and  
10 Rui de Sousa, who associated with Maugein and were allegedly embroiled in the UN/Iraqi "oil  
11 for food" scandal through companies they maintained in Monaco. (Eringer possesses documents  
12 on this matter.)

13 13. Eringer intensively investigated Sovereign Group, a commodity trading company  
14 headquartered in Monaco that operated without business registration, and its principals Richard  
15 and Christopher Chandler (brothers), Monaco residents whom it was suspected were engaged in  
16 money laundering for Russian interests. (Eringer possesses documents on this matter.)

17 14. Through Russian sources, Eringer was able to report to HSH on the Russian SVR & FSB  
18 (Russian intelligence services) perspective on Monaco, including their plans on how to penetrate  
19 HSH's orbit. (Eringer possesses documents on this matter.)

20 15. Eringer investigated British billionaire Philip Green, a Monaco resident, and counseled  
21 HSH to distance himself from Green (who had become friendly with HSH) due to suspicions that  
22 Green was using laundered Russian money to finance his retail take-over bids in the UK and also  
23 because he was under suspicion in the UK for manipulating financial markets. (Eringer  
24 possesses documents on this matter.)

25 16. Eringer introduced HSH to U.S. Senator Saxby Chambliss of Georgia, who sits on the  
26 Senate Select Committee on Intelligence, to further bolster support for HSH from the U.S.  
27 intelligence community.  
28

1 17. Eringer introduced HSH to U.S. Representative Porter Goss, who was at the time  
2 chairman of the Permanent House Committee on Intelligence, to further bolster support of HSH  
3 from the U.S. intelligence community.

4 18. After Porter Goss became Director of Central Intelligence Eringer arranged for HSH to  
5 secretly meet with Goss at CIA headquarters (October 28, 2004), and to be briefed by CIA's  
6 most senior officials on money laundering, counter terrorism finance, and Russian organized  
7 crime.

8 19. At HSH's request, Eringer investigated Leonid Sloutsky, whom the Council of Europe  
9 had delegated to assess Monaco's worthiness as a member. (Eringer possesses documents on  
10 this matter.)

11 20. At HSH's request, Eringer investigated members of one of Monaco's most prominent  
12 families, the Pastors. (Eringer possesses documents on this matter.)

13 21. At HSH's request, Eringer investigated Freemasonry in Monaco and France and provided  
14 him a detailed briefing on the three Masonic lodges in France and their overlap with organized  
15 crime, including links to Monaco. Eringer counseled HSH to curtail Freemason influence in  
16 Monaco, and to follow Britain's example of compelling those in civic jobs to declare Freemason  
17 affiliation for the purpose of transparency, and to quash any attempt by Freemasons to establish a  
18 lodge in Monaco. (Eringer possesses documents on this matter.)

19 22. Eringer investigated the connection between Italian organized crime groups and Monaco.  
20 Eringer pinpointed which banks in Monaco Italian organized crime groups used to launder  
21 money. (Eringer possesses documents n this matter.)

22 23. After twelve months into his service, Eringer had achieved the following results for HSH

- 23 • Prevented a corrupt Russian from buying into Monaco's football team;
- 24 • Spawned an FBI investigation of a retired US Air Force colonel for espionage;
- 25 • Identified Sovereign Group/Chandler brothers of doing unregistered, unlawful  
26 business in Monaco, leading to *Operation Spook*, which discreetly and intentionally  
27 tipped them off that they were under investigation in the hope that they would close  
28 down and move elsewhere;

- 1 • Created liaison partnerships with CIA and SIS. Additionally, created a relationship
- 2 with U.S. political leaders on intelligence oversight committees.
- 3 • Staved off approaches from Patric Maugein to provide business advice to HSH;
- 4 • Prevented Philip Zepter from being influential with HSH;
- 5 • Outfoxed Russian Intelligence in their effort to penetrate HSH's social orbit.

6 24. After eighteen months of service, Eringer created an operational base in Monaco that was  
7 referred to as M-Base, located in Shangri-la, 11 Boulevard Albert 1<sup>st</sup>. Thereafter, Eringer  
8 conducted regular briefings for HSH in M-Base. Attached as Exhibit C is a photograph of HSH  
9 given to Eringer on which HSH wrote "Best wishes and long life to M-Base, Albert."

10 25. At HSH's request, Eringer conducted negotiations with the mother of HSH's illegitimate  
11 daughter. At the time the daughter was 13 years old. The negotiations consisted of demands for  
12 money and recognition of the daughter. While HSH was willing to pay money, he wanted to  
13 avoid public recognition of his daughter. (Eringer possesses documents on this matter.)

14 26. HSH desired to know who in his circle would leak information about him to the press and  
15 others. In response, Eringer designed and conducted an ongoing operation known as *Operation*  
16 *Hound Dog*. This entailed posing an operative as a book author ostensibly to research an  
17 "unauthorized biography" of Prince Albert. Eringer equipped the operative with a fully  
18 backstopped legend, replete with "book contract" from a reputable publisher and an editor who  
19 would vouch for the project if called upon. Eringer's investigative writer made contact with a  
20 number of celebrity magazines, including *Paris Match* and *Oggi*, to identify the reporters  
21 charged with digging up "dirt" on HSH. The objective of *Operation Hound Dog* was to find out  
22 what the reporters really knew, what they were working on, and whom they relied upon in  
23 Monaco and elsewhere for information. HSH requested that Eringer extend this ruse to engage  
24 his many friends to find out what they would say about him behind his back. Eringer skillfully  
25 executed this operation with productive results that identified leaks within HSH's social orbit.  
26 (Eringer possesses documents on this matter.)

27 27. Eringer notified HSH that one of his so-called friends, an American named Stephen  
28 Salzman, possessed a videotape he had made at HSH's 40<sup>th</sup> birthday party inside a Paris strip

1 club in which a young woman is seen performing a sex act upon HSH. Salzman had allegedly  
2 taken to showing this videotape at select parties around Monaco, with the following introduction:  
3 “This is what I have on your Prince.”

4 28. At HSH’s request, Eringer investigated Gocha Arivadze, a Moscow-based Georgian of  
5 dubious character. As a result of his findings, Eringer counseled HSH to keep Arivadze at arm’s  
6 length. (Eringer possesses documents on this matter.)

7 29. Eringer investigated the brothers Simon and David Reuben and reported to HSH that  
8 Simon Reuben, who had been expelled from Monaco in 2002, had been able to return to Monaco  
9 with “privileged” status in 2003 by allegedly paying a bribe. (Eringer possesses documents on  
10 this matter.)

11 30. As a result of Eringer’s efforts, CIA Director Porter Goss pledged to protect HSH and  
12 Monaco, which became accepted as *doctrine* within CIA, along with high priority status.

13 31. At HSH’s request, Eringer investigated Stig Carl-Magnus Carlsson, a Swede resident in  
14 Monaco who had penetrated HSH’s social orbit. Eringer counseled HSH that Carlsson had left a  
15 trail of bankruptcies and disgruntled, litigious investors and was already using HSH’s name to  
16 entice new investors into new ventures meant to finance his lavish lifestyle. (Eringer possesses  
17 documents on this matter.)

18 32. In August 2004, HSH asked Eringer to assist a young woman resident of Nice, France  
19 and aspiring children’s book author and illustrator. Much later, this woman told Eringer that she  
20 had been lured to a yacht to meet HSH, who expressed an interest in helping her. This young  
21 woman claims that she was kidnapped and raped by HSH on the boat. She has sworn an  
22 affidavit, which Eringer possesses.

23 33. On April 6, 2005 HSH’s father, Prince Rainier, passed away and HSH became Monaco’s  
24 Sovereign. Because HSH had retained Eringer thirty-three months earlier, he now knew the  
25 identities of shady individuals who were giving Monaco a bad name and those responsible for  
26 Monaco’s inclusion on the Organization for Economic Co-operation and Development (OECD)  
27 blacklist of tax havens. HSH now had the power to take action.

28

1       34. At HSH's request, Eringer investigated Jean-Paul Carteron, who operated a private-sector  
2 security forum he called Monaco World Summit. Eringer later reported to HSH that Carteron  
3 had made his fortune from looking after the interests of Papa Doc and Baby Doc Duvalier,  
4 Haiti's brutal and corrupt dictators, after which Carteron miraculously parlayed himself into a  
5 "humanitarian" and created his forum in Switzerland, which eventually expelled his forum,  
6 hence Carteron's move to Monaco. Additionally, Carteron was brokering honorary consulships  
7 to and from Monaco for hefty backhanders. Eringer advised HSH that Carteron should be  
8 ordered, at a minimum, to remove *Monaco* from the name of his forum, as it was a private  
9 enterprise masquerading as quasi official, and this was done. (Eringer possesses documents on  
10 this matter.)

11       35. At a meeting in M-Base on April 26, 2005, HSH requested that Eringer investigate  
12 Franck Biancheri, Monaco's finance minister, whom HSH favored to become his chief of staff.  
13 At the same meeting HSH requested that Eringer renew *Operation Hound Dog*, which was his  
14 favorite operation, learning what his friends would say about him behind his back. Also, at the  
15 same meeting, when Eringer asked HSH if he should continue to assist with the matter involving  
16 his (as yet unrecognized) illegitimate daughter, HSH replied, "Could you arrange for her to have  
17 an accident?" This statement was recorded in Eringer's notes of the meeting and was witnessed  
18 by his associate, Piers Erskine.

19       36. Eringer introduced HSH to the Interior Minister of Latvia, and out of this created a  
20 intelligence liaison relationship with Latvia.

21       37. *Operation Hound Dog* led to Paris where, with HSH's specific authorization, his friend  
22 Stephen Salzman and HSH's own lawyer, Thierry Lacoste, were engaged by Eringer's operative.  
23 Eringer later counseled HSH that Salzman had postured himself as the man who held the keys to  
24 Monaco with an expectation to run Monaco, from behind the scenes, with Thierry Lacoste.  
25 (Eringer possesses documents on this matter.)

26       38. Also through *Operation Hound Dog* Eringer's operative cultivated a relationship with  
27 *Paris Match* reporter Romaine Clergeat, who revealed to the operative a few of his sources and  
28 told him the inside story behind their exposure of HSH's illegitimate son.

1 39. Eringer introduced HSH to a senior official of the FSB, successor service to the KGB.  
2 From this introduction Eringer created a liaison relationship with Russian intelligence.

3 40. HSH put Eringer in contact with two officers from SIGER, the tiny political unit of  
4 Monaco's police force: Jean-Raymond Gottlieb and Yves Subraud. Immediately, they  
5 commenced working together in the investigation of finance minister Franck Biancheri. Eringer  
6 and SIGER compiled much evidence of Biancheri's corruption and Eringer presented the interim  
7 results to HSH at a meeting on June 11, 2005. On the basis of Eringer's findings at that juncture,  
8 HSH decided not to appoint Biancheri as chief of staff. Further, HSH resolved to ease Biancheri  
9 out of his job as finance minister, pending a final report.

10 41. At HSH's request, Eringer investigated Laurent Nouvion, whom HSH was considering  
11 for a government position.

12 42. At HSH's request, Eringer positively vetted Jean-Luc Allavena, a Paris based  
13 (Monegasque) businessman and HSH's new choice for chief of staff.

14 43. HSH authorized Eringer to investigate Gerard Brianti, a Monaco football team official  
15 believed to be corrupt and said to be receiving a kickback from every player on Monaco's  
16 football team.

17 44. At his investiture in on July 12, 2005, HSH announced: "I intend that ethics remain the  
18 backdrop for all the actions of the Monegasque authorities. Ethics are not divisible. Money and  
19 virtue must be combined permanently. The importance of Monaco's financial market will  
20 require extreme vigilance to avoid the development of financial activities that are not welcome in  
21 our country." HSH promised the introduction of "a new ethic" through his reign—the very  
22 reason Eringer signed on with him almost three years earlier. This was the basis of Eringer's  
23 service to HSH. HSH was now extremely well informed to act on his promise. But not just yet,  
24 HSH informed Eringer. A three-month mourning period for his deceased father held him up,  
25 followed by a lackadaisical summer at his country home, Roc Agel. HSH took many months to  
26 confirm the appointment of Jean-Luc Allavena, who, as chief of staff, would spearhead the  
27 cleanup of corruption.

28

1 45. At a meeting with HSH in August 2005, Eringer conveyed intelligence that finance  
2 minister Franck Biancheri had allegedly received a bribe of three million Euros from Adnan  
3 Houdrouge, recently given Monegasque nationality, for permission to invest in Monaco's  
4 football team. Further, Biancheri had falsely told Houdrouge that the bribe was for HSH,  
5 causing Houdrouge to tell others, "I have Prince Albert by the balls." Houdrouge, meanwhile,  
6 was under investigation by the French for arms dealing and money laundering.

7 46. At this meeting Eringer made the case for additional funding. The costs of operating the  
8 intelligence service had risen: M-Base, operational security, paid informants, travel expenses.  
9 HSH later raised the quarterly budget from 80,000 Euros to 100,000 Euros.

10 47. Eringer's police sources brought a new matter to his attention: The disappearance from  
11 Monaco's Red Cross of a painting by Joan Miro believed to be worth about one million Euros.  
12 Philippe Narmino (a senior judge and Director-General of the Monaco Red Cross) and his friend,  
13 Gerard Brianti, had allegedly stolen this painting. This inadvertently flagged Eringer to a scam  
14 that had perpetuated for ten years and was still going on: Ageprim, Brianti's company,  
15 possessed the exclusive right to conduct valuations of everything donated to Monaco's Red  
16 Cross: art, automobiles, boats and real estate. Brianti's company invoiced Monaco Red Cross  
17 an astonishing 5 percent of the value of every item assessed. Eringer advised HSH to remove  
18 Narmino as Director-General and to allow other vendors to bid for the valuation business. HSH  
19 chose to take no action, but he requested that Eringer further investigate Narmino as he was  
20 under pressure to appoint Narmino Chief of Monaco's Judicial Services.

21 48. In August 2005, Eringer met in Paris with the chief of France's internal security service,  
22 the DST, and created a liaison relationship.

23 49. Eringer investigated a Russian with interests in Monaco, and discovered that this Russian  
24 had ordered the murders of several persons in Russia to whom he owed money. As a result of  
25 Eringer's investigation, this Russian was eventually declared persona non grata in Monaco.  
26 (Eringer possesses documents on this matter.)

27 50. At HSH's request, Eringer investigated Erminio Giraudi, a Monaco resident wanted in  
28 Italy for alleged criminal offenses. At HSH's request, Eringer investigated Nicholas Bizzio, a

1 dual national American-Italian resident in Monaco, under investigation in Italy for alleged  
2 criminal offenses. (Eringer possesses documents on these matters.)

3 51. At HSH's request, Eringer investigated Dan Fischer/Francu, a wealthy Romanian who  
4 had settled in Monaco, become friends with Monaco's mayor, and was believed to be laundering  
5 Romanian organized crime money through Monaco banks. (Eringer possesses documents on this  
6 matter.)

7 52. Eringer investigated Umar Djabrailov, a Chechen hotelier from Moscow (and alleged  
8 murderer of his ex-business partner in Moscow Paul Tatum). In 2002, Monaco had declared  
9 Djabrailov persona non grata, even though his ex-wife and children were resident in the  
10 principality. However, after winning a seat in the Russian Duma and acquiring a diplomatic  
11 passport, Djabrailov was able to quash Monaco's ban on him.

12 53. In the course of normal intelligence gathering, Eringer learned that Monaco Football  
13 Investment (MFI), ostensibly a private company, was receiving government funds; that in fact  
14 MFI was a Michel Pastor cover for utilizing government money to support Monaco's football  
15 team in violation of European league rules. According to the source, HSH was said to have  
16 approved this (orally), and Pastor, Brianti, and Franck Biancheri were covering up this serious  
17 breach of league rules. Eringer reported this to HSH, along with Brianti's comment to Eringer's  
18 informant that he had HSH "over a barrel."

19 54. In the course of normal intelligence gathering Eringer learned that Brianti had allegedly  
20 paid the tuition for Bruno Philipponnat's two children to attend the International School of  
21 Monaco. As Philipponnat was (and still is) HSH's senior aide-de-camp, Eringer viewed this as a  
22 bribe for influence and reported this as such to HSH. Furthermore, Eringer uncovered a tangled  
23 web of Philipponnat involving himself in the lives of HSH's personal friends with a view toward  
24 receiving backhand commissions from business deals in which HSH's name could be used or  
25 approval given.

26 55. In October 2005, Eringer met in Paris with the Adjunct-Director of Intelligence and  
27 Operations, French Customs and created a liaison relationship. During the same visit to Paris,  
28



1 Eringer met with the DST chief, who told Eringer: "The President of the Republic has been  
2 briefed. He is happy that HSH is sorting out people around him."

3 56. In October 2005, Eringer met with HSH's Paris-based personal lawyer, Thierry Lacoste,  
4 to brief him on his activities. Lacoste had a matter of his own he wished to discuss. He had an  
5 important client resident in Monaco of Lebanese origin named Samy Maroun. Lacoste asked for  
6 Eringer's help, for pay, to determine if Maroun was on a "watch list" in the United States.  
7 (Maroun had been implicated in the UN/Iraq "food for oil scandal.") Eringer declined,  
8 explaining to Lacoste that Eringer worked only in service to HSH and strenuously avoided any  
9 conflict of interest, which included receiving payment from any other person or entity. Eringer  
10 found it quite outrageous that Lacoste on one hand was trying to influence, even manage, HSH's  
11 decision-making in Monaco while, on the other hand, not only representing Monaco-based  
12 clients, but representing clients whose continued presence in the principality was detrimental to  
13 the "new ethic" HSH had been trumpeting, if not actually yet executing.

14 57. In October 2005, HSH authorized Eringer to brief in-coming chief of staff Jean-Luc  
15 Allavena on Eringer's activities. HSH also approved *Operation Scribe*, a PR campaign to get  
16 word out that HSH meant business about cracking down on corruption and organized crime.

17 58. At this meeting HSH agreed that Eringer could receive CIA funds on his behalf to  
18 supplement the cost of intelligence operations, with this caveat: "Make sure the French don't  
19 find out," HSH told Eringer.

20 59. At a dinner/meeting with HSH a few weeks later, Eringer recommended to HSH that he  
21 enlarge SIGER, the police political unit. HSH requested that Eringer draw up a plan for this  
22 enlargement. With reference to *Operation Scribe*, HSH agreed to be interviewed by *Newsweek's*  
23 Paris bureau-chief, and Eringer scheduled this for early the following month (November 2005).

24 60. At the same dinner/meeting, HSH authorized Eringer to lay the groundwork for a  
25 Monaco Institute for Peace and Reconciliation, Eringer's own concept based on HSH's great-  
26 great-grandfather's short-lived International Institute of Peace. The Institute would endeavor to  
27 invite warring countries or factions to Monaco to try to resolve their differences in a private,  
28 discreet and neutral setting, and give HSH a platform as a global arbitrator.

1       61. The next evening HSH stopped by M-Base for martinis and another meeting, at which  
2 Eringer presented a plan to engage the intelligence services of micro-Europe—Monaco,  
3 Luxembourg, Liechtenstein, Andorra, San Marino, and Malta—into an intelligence club, an  
4 association of services that would share information on bad guys and create a cooperative and  
5 combined shield. HSH was extremely enthusiastic about this plan and authorized Eringer to  
6 proceed. Attached as Exhibit D are documents (letter, schedules and itineraries) from meetings  
7 held by the intelligence club after its organization by Eringer.

8       62. On November 8, 2005, Eringer met with Jean-Luc Allavena at the office in Paris he  
9 would vacate one week hence to assume his duties as HSH's chief of staff in Monaco. Eringer  
10 briefed Allavena on his activities and provided him with a number of dossiers with which he  
11 could familiarize himself. On the matter of finance minister Franck Biancheri, Allavena  
12 requested a final report by December 8, 2005. Allavena was also very concerned about the  
13 imminent appointment of Philippe Narmino as Chief of Judicial Services in light of the  
14 intelligence Eringer had collected on Narmino's corrupt activities. Eringer enlightened Allavena  
15 on his plan to enlarge SIGER, the police political unit, whose officers operated in fear of  
16 retribution for investigating corrupt government officials. They needed protection, insulation  
17 and autonomy to investigate without fear of losing their jobs.

18       63. Allavena requested Eringer's dossier on one Enrico Braggiotti, a banker Eringer had  
19 earlier investigated, as he feared Braggiotti was putting pressure on HSH for some unspecified  
20 favor. Braggiotti's bank—Compagnie Monegasque de Banque—was the main bank used for  
21 money laundering by Italian organized crime groups. (Eringer possesses documents on this  
22 matter.)

23       64. Eringer briefed Allavena on the secret relationships with CIA, SIS, and DST, pointing out  
24 that Eringer had now embarked on an expansion program to cultivate relationships with many  
25 other intelligence services, especially in the Balkans and Central Europe, but with a special focus  
26 on micro-European states.

1       65. Eringer also warned Allavena about Thierry Lacoste's conflicted interests in Monaco  
2 while acting as HSH's attorney and his intention to create a kitchen cabinet, an inner circle of  
3 unofficial advisors to influence HSH.

4       66. Later that evening, as part of *Operation Scribe*, Eringer introduced *Newsweek* Paris-  
5 bureau chief Chris Dickey to HSH at HSH's Paris apartment, and Dickey conducted an  
6 interview.

7       67. In November 2005, Eringer met with the chief of Croatia's intelligence service and  
8 created a liaison relationship.

9       68. In November 2005, a paid informant provided intelligence on then Russian President  
10 Vladimir Putin's money laundering activities in Monaco and along the Cote d'Azur. Putin was  
11 apparently behind a number of real estate investments paid for with money siphoned off from  
12 Russia's energy sector. Specifically, a Monaco-based company called Petro Trade, allegedly  
13 engaged in laundering Russian money into French Riviera real estate, and connected Putin to  
14 Russian organized crime figure Sergei Ponomarenko. (Eringer possesses documents on this  
15 matter.)

16       69. In November 2005, Allavena arrived in Monaco to assume his duties as HSH's chief of  
17 staff and he convened a working lunch with Eringer at M-Base. At the top of the agenda:  
18 Philippe Narmino, whose appointment as Chief of Judicial Services was expected by all. Eringer  
19 advised against it. *How could one put a crook in charge of justice?* Eringer's advice: Take a  
20 stand, send the right signal to everyone—*do not make this appointment*. Allavena concurred and  
21 requested a written report on Narmino.

22       70. Second, the restructuring of SIGER, the police political unit. Eringer ran through his  
23 notes of what needed to be done and promised a written report.

24       71. Third, the removal of Franck Biancheri as finance minister. Allavena concurred that this  
25 was necessary. Eringer promised his final report by December 8, 2005 as earlier requested.

26       72. On December 6, 2005, Eringer presented his written report on Franck Biancheri to both  
27 Allavena and HSH in person at M-Base. It detailed a number of Biancheri's corrupt activities  
28 and recommended that he be removed as finance minister. They read and discussed it, and both

1 concurred that Biancheri should go, or, as HSH put it, "We'll make him ambassador to Uganda."  
2 (Eringer possesses a copy of this report.)

3 73. At the same meeting Eringer presented his written report proposing the restructuring of  
4 SIGER--a fully detailed comprehensive plan. Allavena and HSH read and discussed it, and they  
5 both agreed that Eringer's plan should be implemented. Attached as Exhibit E is the SIGER  
6 report.

7 74. At the same meeting HSH and Allavena provided two new names for Eringer to  
8 investigate: (1) David Iacobachvili, whom the Russians had proposed as their Consul to  
9 Monaco; and (2) Igor Yourgens, supposedly Monaco's Consul to Russia, though neither  
10 Allavena nor HSH were certain of this.

11 75. HSH returned to M-Base alone later that evening for a discussion with Eringer about his  
12 senior aide-de-camp Bruno Philipponnat. Red Bull (the beverage company), Eringer told HSH,  
13 had allegedly put Philipponnat on retainer due to his influence with HSH, and Philipponnat had  
14 been able to steer a project Red Bull wanted in Monaco their way. Worse still, Eringer pointed  
15 out, it looked to others privy to such underhanded dealings that Philipponnat was operating on  
16 HSH's behalf. HSH was not surprised, as if he already knew this to be true. He authorized  
17 Eringer to further investigate his aide-de-camp.

18 76. Thierry Lacoste, HSH's personal attorney, had been thwarted by Allavena and Eringer in  
19 his attempt to create a kitchen cabinet, and he was not happy about it. He had also tried to create  
20 a think-tank conference in Monaco, and had invoiced the Palace accordingly, though Allavena  
21 quashed it.

22 77. Working together, Allavena and Eringer made great strides in restoring and strengthening  
23 clean and honest governance in Monaco. In the course of four days they had determined to  
24 remove the finance minister, had reorganized, on paper, the police political unit, exposed an  
25 errant aide-de-camp, and prevented a would-have-been kitchen cabinet.

26 78. In December 2005, with new negative intelligence pouring in on Philippe Narmino, HSH,  
27 Allavena and Eringer reconvened at M-Base and Eringer made an impassioned plea for HSH to  
28 hold off appointing Narmino to Chief of Judicial Services. There was pressure upon HSH to

1 appoint a Monegasque, now allowed under a newly ratified treaty with France. Allavena  
2 suggested requesting the French to fill the position, at least temporarily.

3 79. On December 10, 2005, word reached Eringer that Mark Thatcher, errant son of the  
4 former British prime minister, was spotted in Monaco. Thatcher had recently pled to a felony in  
5 South Africa for his work with mercenaries and a plot to overthrow a small government in  
6 Africa. Further checks confirmed that Thatcher had applied for residency in Monaco, having  
7 already been refused by Switzerland, and had actually been issued a temporary resident permit.  
8 Eringer reported this to HSH and HSH ordered Thatcher expelled. This worked to the advantage  
9 of *Operation Scribe*, as Eringer now had a good example of how HSH was cracking down.  
10 Hence, Eringer ensured that Thatcher's expulsion was reported in detail by the (UK) *Sunday*  
11 *People*, which led to further stories worldwide. Attached as Exhibit F is the Thatcher file.

12 80. HSH's illegitimate daughter and her mother visited Monaco over Christmas 2005 and,  
13 with HSH's knowledge, Eringer hosted them for several meals. Eringer urged HSH to meet, for  
14 the very first time, his 13-year-old daughter in the privacy of M-Base, on the basis that such a  
15 meeting would go a long way to diffusing the acrimony that was hampering a financial  
16 settlement then under negotiation. But HSH could not face up to it and no meeting took place.

17 81. At the very end of 2005, one of Eringer's reliable paid informants told him that Gerard  
18 Brianti had been involved in shredding evidence about the money left in Monaco by two hundred  
19 Jews deported from Monaco to concentration camps in 1944. (Monaco has never made any  
20 restitution to its Holocaust victims.)

21 82. On December 31, 2005, Eringer telephoned Thierry Lacoste, who was fumbling the  
22 negotiations with HSH's illegitimate daughter's mother, to report concerns that the mother had a  
23 serious drinking problem, and that HSH should be concerned about the well-being of his  
24 daughter to the extent that any agreement should contain a provision about the mother seeking  
25 counseling—or perhaps his daughter (Jazmin Grace Grimaldi) could be placed in a top European  
26 boarding school. Unfortunately, Lacoste did not want to know. And although HSH told Eringer  
27 he was right about insisting on such a provision, he instructed Lacoste otherwise.

28

1 83. Somewhat dispirited the first few days of January 2006, Eringer focused on writing his  
2 report on Philippe Narmino. On January 6, 2006, Eringer hand delivered this report to Allavena  
3 at the Palace. It was a devastating indictment of Narmino's corruption and character and  
4 concluded by recommending that Narmino be removed from consideration as Chief of Judicial  
5 Services and also be removed as Director-General of the Monaco Red Cross. Allavena  
6 summoned Claude Palmero, the Palace accountant and Palmero read the report. In front of  
7 Allavena, Palmero confirmed to Eringer that Prince Rainier "wasn't even a shadow of himself  
8 during the last two-to-three years. He wasn't there. He could not even discuss his own personal  
9 affairs. He signed whatever was put before his eyes." This was the period when those around  
10 the feeble-minded Rainier were exploiting his weakness, his ill health, his mental incapacity, and  
11 running rampant with awards and Monegasque passports and job appointments and future job  
12 promises in Prince Rainier's name. This was the state of the Palace as inherited by HSH.  
13 Allavena had his work cut out and the master manipulators and exploiters inside the Palace  
14 already had their knives out for him. (Eringer possesses a copy of this report.)

15 84. Despite all that had been uncovered about Narmino, HSH relented to pressure and  
16 appointed him Chief of Judicial Services.

17 85. At Eringer's next meeting with HSH, Eringer reported his findings on David Iacobachvili  
18 and Igor Yourgens:

- 19 • Iacobachvili: Eringer felt he should be disqualified as a candidate for Consul from  
20 Russia because he had allegedly been bribing the President of Monaco's National  
21 Council, Stephane Valeri, for favors, including an introduction to HSBC in Monaco  
22 to open a bank account. Attached as Exhibit U is the Iacobachvili file.
- 23 • Yourgens: Eringer felt he should be disqualified as a candidate as Monaco's Consul  
24 to Russia because he had been a KGB officer in the 1980s whose specialties were  
25 labor unions and disinformation. Furthermore, Yourgens was connected to Petro  
26 Trade, a company in Monaco believed to be laundering Russian money for Putin.  
27 (Eringer possesses documents on these matters.)

28

1       86. At HSH's request, Eringer investigated Sergei Pugachev, a Russian resident in Nice,  
2 France, who wished to engage in a joint venture with Societe Bains de Mer (SBM—a large resort  
3 which owns and operates in Monaco a number of deluxe hotels, five casinos, several restaurants  
4 and bars, entertainment venues, nightclubs, country club and golf course). The joint venture  
5 entailed SBM managing a luxury hotel that Pugachev was constructing in Moscow. Eringer's  
6 investigation uncovered Pugachev's links to organized crime. As a result, HSH decided to quash  
7 this venture with Pugachev. (Eringer possesses documents on this matter.)

8       87. Eringer flew to Holland to meet the Dutch chief of foreign intelligence, with whom  
9 Eringer created a liaison relationship.

10       88. In early February, three officials of SISMI, the Italian intelligence service, arrived at M-  
11 Base to create a liaison relationship.

12       89. In early March 2006, Thierry Lacoste and Eringer received an extraordinary e-mail from  
13 one Gavin de Becker, a Los Angeles-based security consultant. De Becker had written on  
14 behalf of HSH's illegitimate daughter, in response to HSH's new settlement condition of not  
15 wanting to recognize Jazmin as his daughter until her 18<sup>th</sup> birthday. In a fourteen-page letter, De  
16 Becker essentially stated that if HSH did not recognize Jazmin immediately, he was prepared to  
17 make her the champion of and poster child for abandoned children everywhere in the world.  
18 HSH's illegitimate daughter, he stated, would write a book for worldwide publication and De  
19 Becker would personally ensure that she got onto Oprah Winfrey's popular TV show, among  
20 others, to blacken HSH's name as the world's worst deadbeat dad. A top literary agent, he  
21 wrote, had already been consulted and was foaming at the mouth to proceed. This was De  
22 Becker's ultimatum: Either recognize Jazmin now or prepare yourself for the PR nightmare of  
23 your life. HSH and Lacoste gave into De Becker's demand. Attached as Exhibit G is De  
24 Becker's letter.

25       90. Eringer introduced HSH to a representative of the Prince of Liechtenstein, who offered a  
26 presentation of Liechtenstein's bank reform model. This presentation was conducted at the  
27 Palace two weeks later, presided over by Allavena—during which Eringer was introduced to the  
28 chief of Liechtenstein's Financial Intelligence Unit, with whom Eringer created a liaison

1 relationship. Eringer discussed with him the vision for an association of intelligence services  
2 from micro-European countries. Until that meeting, Liechtenstein (intelligence) had had no  
3 meaningful contact with Monaco, so they were happy just to have made contact with Eringer.

4 91. Eringer traveled to Rome to meet with SISMI senior officials. They told him that his  
5 name had become known to Monaco's bad guys and advised him to "be careful." They joked  
6 that they were taking bets *not* on whether Eringer would make it through the year, but on *who*  
7 would eliminate him: Italian organized crime, Russian organized crime, the Freemasons, the  
8 Monegasque establishment, or the French.

9 92. Before HSH's departure on a North Pole expedition, after which he would meet President  
10 Putin in Moscow, Eringer provided five written memos on Russia and Putin. One dealt with a  
11 company based in Monaco called Sotrama, which was tied to the Taambov organized crime  
12 group in St. Petersburg and Putin personally. Sotrama was one of a network of energy  
13 distribution companies set up around Europe by Putin and his cronies to steal money from the  
14 Russian state and launder it into European real estate. (Eringer possesses copies of memos and  
15 documents on this matter.)

16 93. Soon after Philippe Narmino was appointed Chief of Judicial Services, Eringer uncovered  
17 data revealing Narmino's alleged secret bank accounts (for receiving kickbacks) in Sarajevo  
18 (Bosnia) and San Marino. Despite this new evidence, HSH declined to take action against  
19 Narmino, leaving those privy to this wondering exactly what Narmino might have on HSH.  
20 (Eringer possesses documents on this matter.)

21 94. At HSH's request, Eringer investigated Chalva Tchigirinski, a Russian with Israeli  
22 citizenship who had been introduced into HSH's social orbit by Bruno Philipponnat.  
23 Tchigirinski, Eringer later reported to HSH, was connected to one of the Red Mafia's biggest  
24 names, Simeon Mogilevich.

25 95. Luxembourg's foreign intelligence chief traveled to Monaco to meet Eringer and create a  
26 liaison relationship. He also loved the idea of creating a micro-Europe intelligence association.  
27 Soon after, Eringer traveled to Luxembourg to cement this very special relationship.

28



1 96. Eringer traveled to Brussels to meet a senior official from Bulgaria's intelligence service  
2 and create a liaison relationship.

3 97. As part of *Operation Scribe*, Eringer introduced Jeff Stinson of *USA Today* to Allavena  
4 and HSH for interviews. The resulting story on May 23, 2006 was the best PR HSH ever  
5 received for his clean-up campaign. It headlined the paper's *Money* section: *Monaco Steers*  
6 *Clear of Once-Shifty Image*, subtitled, *Beefed-up intelligence operation monitors comings,*  
7 *goings*. Attached as Exhibit H is a copy of the *USA TODAY* news article.

8 98. In early July 2006, Eringer flew to Rome for meetings with SISMI and for an  
9 introduction from SISMI to the director of the Vatican's intelligence group, who agreed to have  
10 informal contact.

11 99. *Operation Hound Dog* was still alive, and it was used it to infiltrate the existence of  
12 Monaco's nemesis, an investigative reporter named Roger Louis-Bianchini, who had written for  
13 the *Nice-Matin* and authored several books on Monaco. Louis-Bianchini was very forthcoming  
14 with Eringer's operative and Eringer learned much about Bianchini's perspective and possible  
15 sources of leaked information.

16 100. In July 2006, Eringer created a liaison relationship with the chief of Slovenia's  
17 intelligence service. As a result, the Slovenian service confirmed Eringer's intelligence about  
18 the circuit of laundered money leading to Philippe Narmino's disguised bank account in  
19 Sarajevo.

20 101. Eringer created a committee to organize the Monaco Institute for Peace and  
21 Reconciliation, and the committee drafted a charter and a plan for raising funds in HSH's name.  
22 (Eringer possesses documents on this matter.)

23 102. In July, over lunch in Monaco, intelligence chiefs from Liechtenstein, Luxembourg and  
24 Monaco had their first ad hoc meeting of core members to launch the micro-Europe intelligence  
25 association.

26 103. Soon afterwards Eringer traveled to Andorra and met with the chief of Andorra's  
27 Financial Intelligence Unit to invite them to join the micro-Europe intelligence collective.  
28

1           104. Upon Eringer's return to Monaco, Allavena introduced Eringer to Paul Masseron,  
2 Monaco's new interior minister. Masseron was charged with implementing Eringer's plan to re-  
3 organize SIGER, because the Minister of State had petulantly dragged his feet, part of his on-  
4 going power struggle with Allavena for access to HSH.

5           105. In the interest of damage control, a paid informant revealed to Eringer the alleged  
6 identity of HSH's *third* illegitimate child, who remains secret to this day.

7           106. Another paid informant revealed to Eringer that Thierry Lacoste was conspiring with  
8 others to oust Allavena from his job as chief of staff. It was Allavena's role as gatekeeper to  
9 HSH that Lacoste found most objectionable, because clients of Lacoste's, like Samy Maroun, did  
10 not meet Allavena's threshold for what was deserving of face time with HSH. Eringer's paid  
11 informant claimed that Lacoste had tried to dig up dirt on Allavena, but finding nothing, laid a  
12 trap based around HSH's sensitivity to his own limitations and Allavena's obvious command.

13           107. Meantime, Eringer created an executive committee comprised of Allavena, interior  
14 minister Masseron, and the new police chief, Andre Mulhberger. At a meeting of this committee  
15 at M-Base, Eringer briefed the police chief on his mission. Hoping to leave politics—and  
16 Lacoste behind—Eringer wanted to get on with business: his dossiers on bad guys in the hands  
17 of officials who could take action.

18           108. During the next few weeks Eringer created liaison relationships with the intelligence  
19 services of Montenegro, Switzerland, Romania, Poland, and the Ukraine.

20           109. Eringer alerted HSH that French intelligence was monitoring an apartment building in  
21 Beausoleil (a town neighboring Monaco) called Medicis, where a ring of Russian prostitutes was  
22 known to be operating, and where the French had allegedly observed HSH making visits.

23           110. HSH had agreed to sign a letter Eringer had drafted on behalf of the Monaco Institute  
24 for Peace and Reconciliation, but this never materialized. HSH had lost interest, but, as usual,  
25 avoided the subject and let it fall into limbo, leaving Eringer in an embarrassing position with the  
26 committee members recruited for this project.

27           111. HSH told Eringer at a meeting that his former bobsledding partner Frank Nicolas  
28 wanted to create a Freemason lodge in Monaco, and he was inclined to let him go ahead. Eringer

1 was mortified. Only a few years earlier HSH had requested Eringer to investigate Freemason  
2 lodges in France because he was concerned about their influence in Monaco, and Eringer had  
3 briefed him on the organized crime dimension of French Freemasonry.

4 112. In October 2006, Luxembourg hosted the first official meeting of the micro-Europe  
5 intelligence association, which for the purposes of that meeting they called the Club of  
6 Luxembourg. In attendance: Intelligence chiefs from Luxembourg, Monaco, Liechtenstein, and  
7 Malta. Eringer used the occasion to forge a liaison relationship with Malta. It was a successful  
8 meeting, and all agreed to meet again four months hence in Monaco.

9 113. October 30, 2006 was a pivotal day. As Eringer's paid informant had forecast, a trap  
10 had been laid for Allavena, playing upon HSH's Achilles Heel: his hubris. HSH abruptly fired  
11 Allavena. HSH could tolerate criminal behavior, but if someone supposedly spoke negatively  
12 behind his back, he went ballistic—a sensitivity about his own leadership inability. Allavena  
13 was the victim of a smear campaign that suckered HSH. Eringer wrote in his journal at the time:

14 The good news: HSH finally had the balls to fire someone. The bad  
15 news: He fired the wrong person. Good leaders do not react in anger or in  
16 haste. Frightened of being upstaged by Allavena, HSH behaved like a  
17 crybaby. Allavena was the backbone of Albert's reign, honest and  
18 incorruptible, slogging away from seven a.m. to midnight most weekdays  
19 while HSH was off gallivanting, having convinced himself years ago that  
20 attending parties was "working."

21 114. One month later the Palace accountant, Claude Palmero, telephoned Eringer and asked  
22 for a meeting. This was unusual, as it had never happened before. HSH was traveling in Asia  
23 and Eringer could not reach him. One week later in December 2006 Palmero sat stiffly on the  
24 edge of a sofa in M-Base. He said to Eringer: "I have been instructed by the Prince, before he  
25 left on his trip, to terminate your contract." He added that he was prepared to pay one quarter of  
26 2007 "and maybe a month or two beyond if you have not found something else to do."

27 115. Eringer gestured with his arms at the furnishings around them and replied: "What am I  
28 supposed to do about this place? It's not my home. I work here. The Prince authorized me to  
29 extend the lease for six months." This surprised Palmero. "Okay, so we pay until May."  
30 Eringer informed Palmero, "I spoke with the Prince ten days ago and he gave me no indication of  
31 this." Palmero said nothing.

1 116. Eringer had scheduled two important meetings for HSH later in the week, one with CIA,  
2 the other with SIS. Eringer cancelled both.

3 117. Eringer's greatest concern was how to break this news to intelligence liaison partners,  
4 who would see it for what it was: HSH is not a serious leader; he is not serious about cleaning  
5 up his principality; his speech about introducing a new ethic was a crock. Eringer wrote in his  
6 journal:

7 Is Albert out of his mind? Everything I did was in service of the Prince,  
8 carefully avoiding any conflict of interest. I regret nothing. I acted  
9 professionally at all times. I did an excellent job, respected by the  
10 intelligence services with which I created and maintained liaison  
relationships. We were too damned honest and efficient for our own good.

11 118. It was too late to cancel Eringer's own scheduled meetings that week with the chief of  
12 Bosnia's intelligence service and an official from Israel's Mossad, so Eringer went through the  
13 motions of creating new liaison relationships while honestly confiding that the very survival of  
14 the service was at stake.

15 119. Eringer telephoned Allavena with his "termination" news. Allavena replied, "We were  
16 led down a false road."

17 120. After carefully considering the situation, Eringer wrote the following letter to HSH and  
18 faxed it to his office:

19 13 December 2006

20 Dear Prince Albert,

21 As you may know, Claude Palmero notified me on 11 December that you  
22 have instructed him to terminate my service to you.

23 If this is true, I am saddened and surprised that you have chosen not to  
24 deliver this news personally. I have worked very hard on your behalf  
25 during the last five years, and I feel I have contributed much with little  
26 personal gain to myself. This was based on the predication that you  
27 desired to be informed by me on matters pertaining to criminal activities  
28 within the Principality, and that you intended to do something about those  
involved with criminal activity.

1 Furthermore, it is a great shame to close down an entity that has given you  
2 access to fifteen intelligence services in countries of strategic importance  
3 to Monaco. Its value is much, much higher than the funding I have  
4 believed in the new ethic you wished to install in your country.

5 I hope you will meet with me, if only for a few minutes, so I can fully  
6 understand what you feel has gone wrong.

7 As you may remember, I had two meetings scheduled for you tomorrow at  
8 M-Base. At the risk of embarrassing you and/or our visitors should you  
9 not appear, I have cancelled both visits.

10 Again, I hope you will grant me the courtesy of a meeting this afternoon  
11 or this evening.

12 As I discussed with Claude, the dismantling of the infrastructure—M-  
13 Base, local and international relationships, etc—is going to take some time  
14 and expense, but if this is your desire, I shall, with great disappointment,  
15 begin the process. However, before I commence the steps necessary to do  
16 so I must hear from you that this is truly what you want, and whether you  
17 wish that I transfer these relationships or conclude them.

18 Eringer received no response.

19 121. Luxembourg's foreign intelligence chief flew in next day for a previously scheduled  
20 meeting. When Eringer told him his "termination" news he was astounded and replied with  
21 words to the effect: "These doors have been opened. You can't just close them. What would  
22 such an action say about Monaco, about the Prince? It would say he is not serious, was  
23 disingenuous, does not wish to fight corruption, but is happy for Monaco to exist as a criminal  
24 state. Once you are lucky enough to be invited into this club, you don't suddenly leave. You  
25 will be considered a pariah from then on."

26 122. The next day, waiting to board a flight to London, Eringer's cell phone rang. It was  
27 HSH. They conversed largely as follows: HSH said, "Aren't we supposed to be meeting  
28 today?" "Albert," Eringer said, "I've been told by Palmero I've been terminated, that I must shut  
down." "Oh, no," replied HSH, "he wasn't supposed to tell you that." "So Palmero acted  
without your authority?" Eringer asked. "I'm going to bawl him out," replied HSH, who  
professed to know nothing of Eringer's faxed letter to him.

1  
2 123. Eringer later learned that Thierry Lacoste gave the order to Palmero to terminate his  
3 service, believing he could act with HSH's authority. When Eringer informed Luxembourg's  
4 foreign intelligence chief of this development, the Luxembourg official said with words to the  
5 effect: "What happened was a coup d'etat. When people are making decisions without authority  
6 of the ruler, it is a coup d'etat. The French would prefer to leave Monaco alone, but if they ever  
7 come to believe Albert's rule is unstable, they will reluctantly take action."

8 124. In the midst of this, Eringer compiled an assessment of the Islamic terrorist threat to  
9 Monaco, a report that was circulated to the interior minister, the police chief, and HSH.  
10 Attached as Exhibit I is a copy of this report.

11 125. When Eringer next met with HSH he wanted to scale funding back from 100,000 Euros  
12 per quarter to where they had been two quarters earlier, to 80,000 euros per quarter, and Eringer  
13 reluctantly agreed to this cut.

14 126. Eringer's on-going investigation of Gocha Arivadze led to Villa Mangiacane, an estate  
15 in San Casciano, near Florence that had once been the family seat of Niccolo Machiavelli.  
16 Arivadze was a secret owner, through laundered funds, of this property. In January 2007,  
17 Arivadze played host to a group of Russians from the energy sector and intelligence services.  
18 What's more, he falsely hosted them in HSH's name, and told those assembled that the brand  
19 new 2007 Rolls Royce parked outside with Monaco tags was HSH's car, on loan to him  
20 specifically for this meeting. The tags traced not to HSH, but to a friend of HSH, whom  
21 Arivadze used to disguise his own ownership of the vehicle. (Eringer possesses documents on  
22 this matter.)

23 126. Arivadze was Moscow's lightning rod in Monaco, using his influence with HSH to pave  
24 the road for massive Russian money laundering into real estate investment in the principality.  
25 Arivadze and his fellow Russians used prostitutes and the prospects of lucrative money making  
26 deals to lure HSH's friends to Moscow, compromise them, and turn them into members of the  
27 team.

28 127. Arivadze allegedly received an award at the Kremlin from President Putin for his access  
to (and influence with) HSH, mostly through corrupt aide-de-camp Bruno Philipponnat, who

1 exclusively handled Russian business on behalf of the Palace through General Vladimir  
2 Pronichev, Commander of the Federal Border Guards, who had overseen Russia's cooperation  
3 with HSH's North Pole expedition. And also for choreographing the Russian "gift" of a dacha,  
4 built from scratch by Russian laborers on HSH's country estate, Roc Agel—a project that  
5 cemented Philipponnat's relationship with General Pronichev and the Russians.

6 128. An accountant with Monaco's football team was brought to M-Base because he did not  
7 know where else to turn. He provided Eringer with documents that detailed financial  
8 irregularities and suspicious payments, including payments to Swiss accounts, which was illegal.  
9 It was also illegal for Gerard Brianti to commingle funds from ASM with Ageprim, his own  
10 company, yet these documents revealed this was what Brianti was doing. The accountant told  
11 Eringer he had shown these documents to HSH and could not understand why HSH had not  
12 taken action.

13 129. HSH had become evasive with Eringer. Eringer thinks by this time HSH had decided he  
14 did not want to hear any more about shady characters engaged in criminal activities in Monaco.  
15 HSH did not appear at a meeting scheduled with Eringer to brief him on a very shady character  
16 named Thamer Bin Said Ahmed Al-Shanfari, who had arrived in Monaco to deal in conflict  
17 diamonds and laundered money. Instead HSH went go-karting. (Eringer possesses documents  
18 on this matter.)

19 130. In February 2007, Eringer hosted in Monaco a meeting of the micro-Europe intelligence  
20 association, which, on this occasion, was given a permanent name: The Columbus Group (after  
21 Hotel Columbus, in which they met). They had an excellent meeting and agreed to meet again  
22 four months hence in Malta.

23 131. Following this meeting, Eringer arranged for Luxembourg's intelligence chief to meet  
24 HSH at M-Base, where the Luxembourg chief conveyed to HSH the importance of keeping the  
25 Monaco Intelligence Service alive. HSH asked if Luxembourg intelligence had contact with  
26 Monaco before the existence of Monaco Intelligence and Eringer's initiative? Answer: No.  
27 Furthermore, the chief explained, before Eringer's initiative Luxembourg also lacked any  
28

1 meaningful contact with Liechtenstein and that the new Columbus Group was of great strategic  
2 importance.

3 132. By this time it was clear Eringer had made the French very nervous, for two reasons:  
4 (1) They had dirt on corrupt Monegasques like Philippe Narmino, Chief of Judicial Services, and  
5 they liked it that way for their own leverage as needed; and (2) Eringer knew about Putin's  
6 network of energy trading and distribution companies (and money laundering) along the French  
7 Riviera, which the French were presumably leveraging to gain a long-term energy deal with  
8 Gazprom. Their nervousness was that Eringer might disrupt or compromise one or both, by  
9 design or accident.

10 133. On March 25, 2007 as scheduled by Eringer, HSH met U.S. Ambassador (to France)  
11 Craig Stapleton and the CIA's Paris station chief. HSH was about to fly to Moscow, at Putin's  
12 invitation, to attend a Kremlin celebration in honor of Rostropovich. Eringer asked HSH if  
13 Gocha Arivadze would be there too. HSH hesitated a moment and replied "no." The next day,  
14 Arivadze flew on HSH's plane with him to Moscow. At the end of the meeting with the two  
15 U.S. officials, Eringer conferred privately with HSH, pointing out that Eringer needed to brief  
16 him on Thamer Al-Shanfari, who deserved to be booted from Monaco, and a Syrian resident in  
17 Monaco who it was believed was selling arms to Islamic terrorist groups. Very shady people—  
18 the sort HSH professed were unwelcome in his principality.

19 134. Eringer wrote in his journal about HSH: "No leadership skills, out of his depth, refuses  
20 to take charge." Eringer was not the only one to think such things. Others close to HSH were  
21 equally concerned. And Monegasques on the street were already saying that HSH was not in  
22 control of his country; that Monaco was being run by bad guys. For example, Stephen Salzman  
23 was said to have used influence with HSH to secure a property development deal for the British  
24 Candy brothers, Nick and Christian, from whom he allegedly received an apartment valued at  
25 about three million Euros.

26 135. In February 2007, Eringer traveled to San Marino to create a liaison relationship with  
27 the chief of their Financial Intelligence Unit and to invite them to join the Columbus Group.  
28 San Marino heartily accepted.



1  
2 136. In May Eringer received quite an alarming report from a trusted source coming out of  
3 Russia regarding aide-de-camp Bruno Philipponnat: *Philipponnat reports Monaco's national*  
4 *secrets and Palace activities monthly to the French, and the Russians are equally well informed.*  
5 The thing HSH hated most was to be taken for a fool and he was allowing both the French and  
6 Russians to take him for one. All of Eringer's cautions to HSH from the day Eringer  
7 commenced his work had been thrown to the wind.

8 138. On June 16, 2007, on the fifth anniversary of Eringer's retainer by HSH, Eringer spoke  
9 with HSH by telephone. Eringer briefed HSH that he would depart presently for a meeting of the  
10 Columbus Group in Malta. Eringer asked HSH if he should continue building the intelligence  
11 service and Columbus Group and HSH replied in the affirmative. Two days later Eringer flew to  
12 Malta to attend a Columbus Group meeting.

13 139. On August 2, 2007, Eringer briefed HSH on his activities, especially concerning the  
14 liaison relationships Eringer had established with intelligence services in twenty countries. HSH  
15 instructed Eringer to keep this work going. HSH requested that commencing the following  
16 quarter in October 2007 Eringer reduce his fee to 40,000 Euros and solely focus on maintaining  
17 and working the liaison relationships.

18 141. On December 2, 2007, HSH and Eringer had a brief telephone conversation. On  
19 December 17, 2007, Eringer sent HSH his invoice for the first quarter of 2008 requesting  
20 payment of 40,000 Euros. On January 28, 2008, Eringer wrote HSH informing him that he is  
21 carrying out HSH's last instructions to "keep the doors open" of the intelligence service. The  
22 letter included another copy of Eringer's invoice and request for payment. Not having received  
23 payment, Eringer sent invoices to HSH again in February and March 2008. On March 25, 2008,  
24 Eringer wrote HSH explaining that he has carried out HSH's instructions but had not been paid  
25 for the first quarter of 2008 and again requested payment. HSH did not respond to these letters  
26 or Eringer's voicemails. Attached as Exhibit J are copies of the letters and invoices sent to HSH.

27 142. With HSH providing no direction or communication, Eringer was in limbo and  
28 uncertain if he should shut down the intelligence service or keep this valuable entity operating

1 for HSH. After having worked for one quarter without communication or payment from HSH,  
2 Eringer terminated his services.

3 142. On April 18, 2008, Eringer had his Washington, DC based attorneys send HSH a  
4 demand for payment. HSH has not responded to this letter a copy of which is attached as Exhibit  
5 K.

6 143. Plaintiff alleges that he has performed all obligations to defendants required under the  
7 Agreement except those obligations plaintiff was prevented or excused from performing.  
8

9 **FIRST CAUSE OF ACTION**  
10 **(Breach of Contract - as to all defendants)**

11 144. Plaintiff re-alleges all of the allegations contained in paragraphs 1 through 143,  
12 inclusive, of this complaint, and incorporates them here by this reference as though fully set  
13 forth.

14 145. On June 16, 2002, plaintiff and defendants entered in an oral Agreement whereby  
15 plaintiff would serve as an intelligence advisor and intelligence service director to HSH.  
16 Plaintiff's service began July 1, 2002 for an agreed remuneration of 60,000 Euros each calendar  
17 quarter. At the beginning of 2003 this payment was increased to 80,000 Euros each calendar  
18 quarter. For a period of two quarters in 2006 this payment was increased to 100,000 Euros, but  
19 then later reduced to 80,000 Euros before finally being reduced to 40,000 Euros per quarter for  
20 the last quarter of 2007 and first quarter of 2008.

21 146. During the period of Eringer's service to HSH, from July 2003 to May 2004 and July  
22 2006 to March 2008, Eringer resided and worked for HSH in Santa Barbara, California. From  
23 Eringer's office in Santa Barbara, California, he performed many services for HSH, including  
24 but not limited to (1) maintaining, working and servicing liaison relationships with foreign  
25 intelligence services, (2) communicating with and instructing deputies in Monaco, (3) sending  
26 and receiving communications with sources, assets and informants, (4) performing research, and  
27 (5) maintaining telephone contact with HSH and briefing him on matters of concern.  
28

1 147. Defendants breached the Agreement by refusing or failing to pay plaintiff the agreed  
2 compensation of 40,000 Euros for the first quarter of 2008 due and payable on January 1, 2008.  
3 Plaintiff has performed all obligations to defendants and performed them in Santa Barbara,  
4 California.

5 148. As a proximate result of defendants' breach of the Agreement as alleged herein, plaintiff  
6 has been damaged in a sum in excess of the jurisdiction of this court, plus, interest, in an amount  
7 to be proven at trial.

8 **SECOND CAUSE OF ACTION**  
9 **(Misrepresentation - as to all Defendants)**

10 149. Plaintiff hereby incorporates paragraphs 1 through 147 herein as though fully set forth.

11 150. Plaintiff agreed to provide Defendants intelligence advisor and director of intelligence  
12 services for payment of 40,000 per quarter.

13 151. Defendants falsely represented that they would pay Plaintiff 40,000 Euros for his  
14 services during the first quarter of 2008 when they in fact had no intention of paying him.  
15 Plaintiff provided his services as agreed and did not get paid by Defendants.

16 152. At the time the Plaintiff acted, Plaintiff was unaware of Defendants false statements  
17 regarding payment for the first quarter of 2008.

18 153. In consideration of services provided by Plaintiff, Defendants promised to pay to  
19 Plaintiff 40,000 Euros due on January 1, 2008.

20 154. Defendants made these promises with the intent to defraud and induce Plaintiff to  
21 provide services to Defendants, and without any intention of performance on its behalf.

22 155. At the time the Plaintiff acted, Plaintiff was unaware of Defendants' intentions not to  
23 pay for services as promised. Plaintiff acted in justifiable reliance upon Defendants' promises  
24 when he provided his services.

25 156. Because of Plaintiff's reliance upon Defendants' conduct, false statements and  
26 misrepresentations, Plaintiff has suffered damages in an amount to be proven at trial.  
27  
28

1 157. The Defendants' acts alleged above were willful, wanton, malicious, oppressive and  
2 were undertaken with the intent to defraud, and justify the awarding of exemplary and punitive  
3 damages.

4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

WHEREFORE, plaintiff prays as follows:

**1. BREACH OF CONTRACT**

- a. For damages and losses from the breach of contract according to proof.
- b. For interest on the damages according to proof.

**2. MISREPRESENTATION**

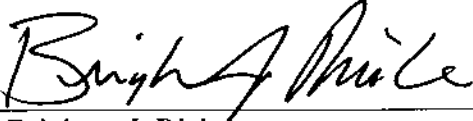
- c. For damages and losses from the misrepresentation according to proof.
- d. For exemplary and punitive damages according to proof.

**3. ON ALL CAUSES OF ACTION**

- e. For costs of suit herein incurred
- f. For such other and further relief as the court may deem proper.

DATED: October 5, 2009

**RICKS LAW**

By:   
Brigham J. Ricks  
Attorney for Plaintiff  
Robert Eringer

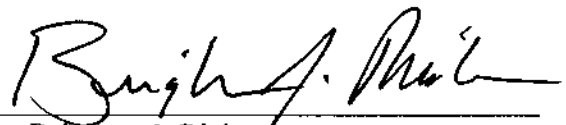
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**JURY DEMAND**

Plaintiff demands a trial by jury on all issues in this action.

DATED: October 5, 2009

**RICKS LAW**

By:   
Brigham J. Ricks  
Attorney for Plaintiff  
Robert Eringer

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

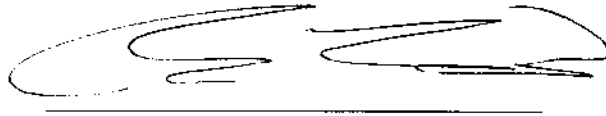
**VERIFICATION**

STATE OF CALIFORNIA, COUNTY OF SANTA BARBARA,

I have read the foregoing document entitled Verified Complaint and know its contents.

I am a party to this action. The matters stated in the foregoing Complaint are true of my own knowledge except as those matters which are stated on information and belief, and as to those matters I believe them to be true.

Executed on October 5, 2009, at Santa Barbara, California. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.



ROBERT ERINGER

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**LIST OF EXHIBITS**

- EXHIBIT A: Wiring statements (Paragraph 6).
- EXHIBIT B: Note and MIS card (Paragraph 7).
- EXHIBIT C: Photo: "Best wishes and long life to M-Base" (Paragraph 24).
- EXHIBIT D: Micro-Europe intelligence assn letter, schedules & itineraries (Paragraph 61).
- EXHIBIT E. SIGER report (Paragraph 73).
- EXHIBIT F. The Mark Thatcher file. (Paragraph 79).
- EXHIBIT G. Gavin De Becker's letter (Paragraph 89).
- EXHIBIT H. USA Today article. (Paragraph 97).
- EXHIBIT I. MIS Report on Islamic terrorist threat (Paragraph 124).
- EXHIBIT J. Letters & invoices to HSH (Paragraph 141).
- EXHIBIT K: Winston & Strawn Letter (Paragraph 142).

# **EXHIBIT A**



SAS LE PRINCE ALBERT DE MONACO  
ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone : +377 93 25 18 31  
Télécopie : +377 93 50 81 73  
E-Mail : adb@palais.mc

**ROBERT HENRY ERINGER**  
78 MARYLEBONE HIGH STREET STE 7  
  
W1U 5AP LONDON ENGLAND

MONACO le 25/08/03

Notre référence : 201

Votre référence :

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 25/08/03

Date	N° pièce	Libellé	Echéance	Avoirs ou règlement	Vos factures
19/06/03	3T03	ROBERT HENRY ERINGER	27/08/03		80 000.00
				<b>Solde en votre faveur</b>	80 000.00

Nous donnons ordre à notre Banque BNP MC

d'émettre un virement de 80 000,00 EUR

Vous en souhaitant une bonne réception, veuillez agréer, Monsieur Madame, l'assurance de nos sentiments  
les meilleurs.

SAS LE PRINCE ALBERT DE MONACO

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone : +377 93 25 18 31  
Télécopie : +377 93 50 81 73  
E-mail : adb@palais.mc

**ROBERT HENRY ERINGER**  
78 MARYLEBONE HIGH STREET STE 7  
  
W1U 5AP LONDON ENGLAND  
  
MONACO le 31/12/03

Notre référence : 332

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 31/12/03

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
13/10/03	4T03	ROBERT HENRY ERINGER	23/10/03		80 000.00
				<b>Solde en votre faveur</b>	80 000.00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 80 000,00 € au profit du compte :

**[REDACTED]**

Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

SAS LE PRINCE ALBERT DE MONACO

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone : +377 93 25 18 31  
Télécopie : +377 93 50 81 73  
E-mail : adb@palais.mc

**ROBERT HENRY ERINGER**  
78 MARYLEBONE HIGH STREET STE 7  
  
W1U 5AP LONDON ENGLAND  
  
MONACO le 02/04/04

Notre référence : 39

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 02/04/04

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
02/03/04	1T04	ROBERT HENRY ERINGER	12/03/04		80 000.00
				<b>Solde en votre faveur</b>	80 000.00

Nous donnons ordre à notre banque d'émettre en votre faveur, un virement de 80 000,00 € au profit du compte :

██████████ ██████████ ██████████

Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

SAS LE PRINCE ALBERT DE MONACO

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone : +377 93 25 18 31  
Télécopie : +377 93 50 81 73  
E-mail : adb@palais.mc

ROBERT HENRY ERINGER  
78 MARYLEBONE HIGH STREET STE 7  
W1U 5AP LONDON ENGLAND  
MONACO le 18/06/04

Notre référence : 137

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 18/06/04

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
14/06/04	2T04	ROBERT HENRY ERINGER	24/06/04		80 000.00
				Solde en votre faveur	80 000.00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 80 000,00 € au profit du compte :

Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

SAS LE PRINCE ALBERT DE MONACO

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone : +377 93 25 18 31  
Télécopie : +377 93 50 81 73  
E-mail : adb@palais.mc

ROBERT HENRY ERINGER  
78 MARYLEBONE HIGH STREET STE  
  
W1U 5AP LONDON ENGLAND  
  
MONACO le 13/10/04



Notre référence : 231

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 13/10/04

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
06/09/04	3T04	ROBERT HENRY ERINGER	13/10/04		80 000.00
<b>Solde en votre faveur</b>					80 000.00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 80 000,00 € au profit du compte :

   
Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

SAS LE PRINCE ALBERT DE MONACO

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone : +377 93 25 18 31  
Télécopie : +377 93 50 81 73  
E-mail : adb@palais.mc

ROBERT HENRY ERINGER  
78 MARYLEBONE HIGH STREET STE  
W1U 5AP LONDON ENGLAND  
MONACO le 13/01/05

Notre référence : 332

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 13/01/05

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
22/11/04	4T04	ROBERT HENRY ERINGER	05/01/05		80 000.00
<b>Solde en votre faveur</b>					80 000.00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 80 000,00 € au profit du compte :

Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

SAS LE PRINCE ALBERT II DE MONACO

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone : +377 93 25 18 31  
Télocopie : +377 93 50 81 73  
E-mail : adb@palais.mc

ROBERT HENRY ERINGER  
78 MARYLEBONE HIGH STREET STE  
W1U 5AP LONDON ENGLAND  
MONACO le 19/04/05

Notre référence : 63

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 19/04/05

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
18/03/05	1T05	ROBERT HENRY ERINGER	28/03/05		80 000.00
<b>Solde en votre faveur</b>					80 000.00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 80 000,00 € au profit du compte :

Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

**SAS LE PRINCE ALBERT II DE MONACO**

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone : +377 93 25 18 31  
Télécopie : +377 93 50 81 73  
E-mail : adb@palais.mc

**ROBERT HENRY ERINGER**  
78 MARYLEBONE HIGH STREET STE  
W1U 5AP LONDON ENGLAND  
MONACO le 06/06/05

Notre référence : 93

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 06/06/05

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
24/05/05	2T05	ROBERT HENRY ERINGER	03/06/05		80 000.00
<b>Solde en votre faveur</b>					80 000.00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 80 000,00 € au profit du compte :

Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.



**SAS LE PRINCE ALBERT II DE MONACO**

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone : +377 93 25 18 31  
Télécopie : +377 93 50 81 73  
E-mail : adb@palais.mc

**ROBERT HENRY ERINGER**  
78 MARYLEBONE HIGH STREET STE  
  
W1U 5AP LONDON ENGLAND  
  
MONACO le 05/08/05


Notre référence : 196

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 05/08/05

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
15/07/05	3T05	ROBERT HENRY ERINGER	25/07/05		80 000.00
<b>Solde en votre faveur</b>					80 000.00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 80 000,00 € au profit du compte :

  
Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

**SAS LE PRINCE ALBERT II DE MONACO**ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACOTéléphone : +377 93 25 18 31  
Télécopie : +377 93 50 81 73  
E-mail : adb@palais.mc**ROBERT HENRY ERINGER**  
78 MARYLEBONE HIGH STREET STE

W1U 5AP LONDON ENGLAND

MONACO le 13/10/05

Notre référence : 354

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 13/10/05

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
03/10/05	4T05	ROBERT HENRY ERINGER	13/10/05		80 000.00
<b>Solde en votre faveur</b>					80 000.00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 80 000,00 € au profit du compte :

Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

**AVANCES**

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone :

Télécopie :

E-mail :

**ROBERT HENRY ERINGER**  
78 MARYLEBONE HIGH STREET STE

W1U 5AP LONDON ENGLAND

MONACO

le 20/02/06

Notre référence : 1

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 20/02/06

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
01/01/06	1T06	ROBERT HENRY ERINGER	01/01/06		80 000,00
Solde en votre faveur					80 000,00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 80 000,00 € au profit du compte :

Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

**AVANCES**

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone :  
Télexcopie :  
E-mail :

**ROBERT HENRY ERINGER**  
78 MARYLEBONE HIGH STREET STE  
  
W1U 5AP LONDON ENGLAND

Notre référence : 500  
MDTS


MONACO le 19/04/06

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 19/04/06

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
03/04/06	2T06	ROBERT HENRY ERINGER	03/04/06		80 000,00
<b>Solde en votre faveur</b>					80 000,00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 80 000,00 € au profit du compte :

  
Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

**AVANCES**

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone :  
Télécopie :  
E-mail :

**ROBERT HENRY ERINGER**  
78 MARYLEBONE HIGH STREET STE  
W1U 5AP LONDON ENGLAND

Notre référence : 958  
MDTS

MONACO le 13/07/06

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 13/07/06

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
03/07/06	3T06	ROBERT HENRY ERINGER	03/07/06		80 000,00
<b>Solde en votre faveur</b>					80 000,00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 80 000,00 € au profit du compte :

  
Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

**AVANCES**

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone :  
Télécopie :  
E-mail :

**ROBERT HENRY ERINGER**  
78 MARYLEBONE HIGH STREET STE  
  
W1U 5AP LONDON ENGLAND

Notre référence : 1327  
MDTS


MONACO le 23/10/06

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 23/10/06

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
02/10/06	4T06	ROBERT HENRY ERINGER	02/10/06		100 000,00
<b>Solde en votre faveur</b>					100 000,00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 100 000,00 € au profit du compte :

  
Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

**AVANCES**

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone :  
Télécopie :  
E-mail :

**ROBERT HENRY ERINGER**  
78 MARYLEBONE HIGH STREET STE  
  
W1U 5AP LONDON ENGLAND

Notre référence : 354  
MDTS

MONACO le 02/04/07

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 02/04/07

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
21/03/07	2T07	ROBERT HENRY ERINGER	21/03/07		80 000,00
<b>Solde en votre faveur</b>					80 000,00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 80 000,00 € au profit du compte :

**[REDACTED]**

Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

**AVANCES**

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone :  
Télécopie :  
E-mail : adb@adb.mc

**ROBERT HENRY ERINGER**  
78 MARYLEBONE HIGH STREET STE  
  
W1U 5AP LONDON ENGLAND

MONACO le 01/10/07

Notre référence : 398  
MDTS

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 01/10/07

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
25/06/07	3T07	ROBERT HENRY ERINGER	25/06/07		80 000,00
<b>Solde en votre faveur</b>					80 000,00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 80 000,00 € au profit du compte :

   
Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.



**AVANCES**

ADMINISTRATION DES BIENS  
PALAIS PRINCIER  
98000 MONACO

Téléphone :  
Télécopie :  
E-mail : adb@adb.mc

**ROBERT HENRY ERINGER**  
78 MARYLEBONE HIGH STREET STE

W1U 5AP LONDON ENGLAND  
GRANDE BRITAÑNE

Notre référence : 406  
MDTS

MONACO le 24/10/07

Monsieur, Madame,

Nous vous prions de trouver ci-dessous le détail des sommes que nous vous devons à la date du 24/10/07

Date	N° pièce	Libellé	Echéance	Avoirs ou règlements	Vos factures
24/09/07	4T07	ROBERT HENRY ERINGER	31/10/07		40 000,00
<b>Solde en votre faveur</b>					40 000,00

Nous donnons ordre à notre banque d'émettre, en votre faveur, un virement de 40 000,00 € au profit du compte :

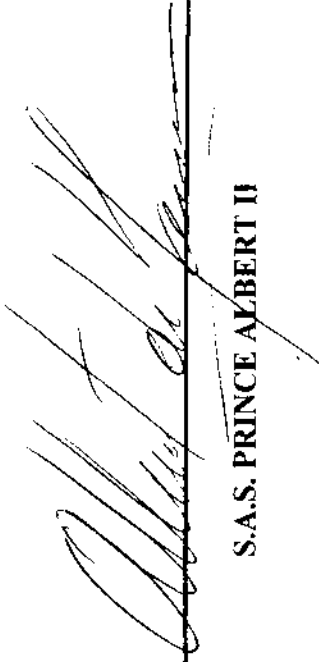
Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

# **EXHIBIT B**

**S.A.S. PRINCE ALBERT II**

Please give Mr. Robert ERINGER your confidential assistance.

He acts on my authority and reports directly to me.

A handwritten signature in black ink, appearing to read 'Albert II', is written over a solid horizontal line. The signature is cursive and somewhat stylized.

**S.A.S. PRINCE ALBERT II**

PRINCIPALITY OF MONACO  
MONACO INTELLIGENCE SERVICE



**M.I.S**

The bearer of this card acts upon the authority of H.S.H Prince Albert II. All Military, Civilian Institutions & Armed Forces are to allow free passage & give total confidential assistance.



ID n°: 001

Name: Robert Eringer

Date of birth: 05/10/1954

*Albert II*  
-H.S.H PRINCE ALBERT II



Robert Eringer

MONACO INTELLIGENCE SERVICE



*Albert de Monaco*  
H.S.H. Prince Albert of Monaco

# **EXHIBIT C**





To Robert and Piers,  
Best wishes and long life to 'M' Borse  
Albert



# **EXHIBIT D**





Club de Luxembourg  
Kick-off meeting  
held in Luxembourg, 24th & 25th October 2006

## **Programme**

**Tuesday, 24<sup>th</sup> October 2006**

**19:45** Gathering in the lobby of the hotel and departure (on foot) to the Restaurant "Le Bouquet Garni- St. Michel" (in the vicinity of the hotel)

**20:00-22:00** Official dinner hosted by the director of SRE

**Wednesday, 25<sup>th</sup> October 2006**

**09:00** Gathering in the lobby of the "Parc Beaux-Arts" Hotel for transfer by car to the conference location

**09:45-12:30** Meeting session in the conference centre of the "Château de Senningen"

**12:30-14:00** Buffet lunch within the castle premises

**14:30-15:00** Return to the hotel

**16:00-17:30** Guided walking tour of the historical core of the city of Luxembourg

**17:30-18:00** Departure for a wine tasting event in the cellars of the winery "Linden-Heinisch" in Ehnen (a traditional village in Luxembourg's wine producing region)

**18:00-19:30** Wine tasting event

**19:45-22:00** Dinner at the Restaurant "Simmer" in Ehnen

**22:00** Return by car to the "Parc Beaux-Arts" Hotel

---

**The departure of the delegations to the airport of Luxembourg-Findel will be arranged according to individual departure times.**

**Addresses and useful contact numbers:**

**Parc BEAUX-ARTS Hotel**

1, rue Sigefroi  
L-2536 Luxembourg  
tél: +352 44 23 23-23 23

**Airport of Luxembourg:**

**Luxair Reservation & Sales:  
+352 24 56 42 42**

For any other requirement, please contact:

**Mrs. Yvonne CELLERANI  
+352-621 319 492**



Luxembourg, le 30 août 2006.

**DIR/2087/2006**

**Attention to Mr. Robert ERINGER  
MONACO**

Dear colleagues,

Following a number of meetings that I had with several of you on a bilateral basis over the last few months, it became increasingly evident to me that we seem to share a number of common problems directly linked to the relative size of our countries. In some cases, I discovered that several of us have developed similar strategies in order to overcome these challenges, in other cases, the approaches differ.

The exchange of views I had with you regarding your experiences and best practices proved to be of great value for me and my service, and I am convinced that we all could still learn from each other's experiences. Therefore, I would like to invite you to an informal multilateral meeting in Luxembourg on October 24<sup>th</sup> and October 25<sup>th</sup> aimed at stimulating a multilateral exchange of views between us.

I intend this meeting primarily to provide for a platform for networking, the establishment of working relationships and an open exchange of views on any issue of mutual interest. The working session should mainly be reserved for introducing ourselves, our position inside our national structures, and our respective mandates, and to define areas of mutual interest.

I would be most honoured if you accepted my invitation to a welcome dinner on October 24<sup>th</sup> and a working session on October 25<sup>th</sup> followed, as time permits, by an informal social programme and a closing dinner. Please advise Mrs Cellerani, my officer responsible for international liaisons, about on your attendance as well as your travel schedule. We hold hotel reservations for all participants. All transportation, including airport transfers, will be assured by my service. Logistical details will follow in due course.

I am looking forward to meeting you in Luxembourg in October.

Yours sincerely

Marco Mille  
Director



MINISTERE D'ETAT  
Service de renseignement  
Luxembourg

Le directeur

Luxembourg, 24th October 2006

**Mr. Robert ERINGER ,**  
**Principality of MONACO**

Dear Colleague,

I would hereby like to welcome you to the Grand Duchy of Luxembourg and express my satisfaction in meeting all of you tomorrow for discussions on the premises of the "Château de Senningen".

I personally look forward to our meeting and I am confident that it will provide us with the opportunity to exchange ideas about topics of common interest and to promote a cordial understanding between our "small" services.

Accordingly, I would like to invite you to a welcome dinner tonight, which will take place in a restaurant in the vicinity of your hotel.

For any further information about the program of the meeting, please consult the small booklet you received as part of your welcome kit upon arrival.

In the hope that your stay in Luxembourg will be pleasant and that the meeting will be fruitful, please allow me to, once again, warmly welcome you in the Grand Duchy of Luxembourg.

Marco Mille, Director SRE



MINISTÈRE D'ÉTAT  
Service de renseignement  
Luxembourg

## Agenda

---

- Presentation of the services
- Future membership and title of the new forum
- Frequency of meetings
- Communication
- Topics of common interests



## Participation list

### **MSS-Malta**

Mr. Godfrey SCICLUNA	Director
Mr. Mark GALEA	Head of FLO

### **Monaco**

Mr. Robert ERINGER	Director
--------------------	----------

### **FIU - Liechtenstein**

Mr. René BRÜLHART	Director
-------------------	----------

### **SRE Delegation:**

Mr. Marco MILLE	Director
Mr. Frank SCHNEIDER	Head of Intelligence
Ms. Nathalie GRIGNARD	Liaison Office
Ms. Yvonne CELLERANI	Liaison Office







ROBERT ERINGER

Monaco 5<sup>th</sup> February 2007

Dear Friends,

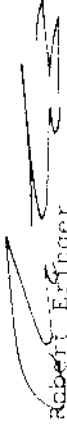
With great pleasure, our micro-service welcomes you to our micro-state. Our objective is to eat well, drink fine, talk business to our mutual advantage and, most important, to laugh as much as we can.

It was Sidney Reilly who coined the phrase "Trust no one" (and eventually got himself killed by trusting someone running something called -- of all things -- The Trust). But trust us at least to show you a good time, even if, in the great tradition of Sir Francis Walsingham, we bankrupt ourselves in the process.

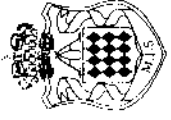
It is truly spectacular to have you here. We're already moving mountains -- and just cranking up.

Do not hesitate to ask my deputy Jean-Léonard (JL) if there is anything he can do to make your visit more pleasant.

Robert ERINGER  
Director, M.I.S



Robert Eringer

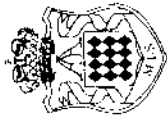


COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF THE ATTORNEY GENERAL  
FEBRUARY 2007

Monday 5<sup>th</sup> February 2007

19h00 Gathering at Columbus Hotel bar.

20h00 Departure to "beef bar" restaurant (walking distance from the hotel).



## Tuesday 6<sup>th</sup> February 2007

Breakfast is included and will take place in the restaurant of Hotel Columbus.

09h00 Meeting session in conference room n°2 (Hotel Columbus). The conference room is located on floor 00 (press lift button 00).

13h00 Lunch in the restaurant of the hotel

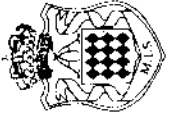
14h30 Departure to visit of the Oceanographic Museum. You will be issued with free passes for all the museums of Monaco.

16h30 Return to the hotel

18h00 Departure for a very special visit of the wine cellars of the Hotel de Paris. These cellars are not open to the public. Considered to be the biggest and most precious wine cellar in the world...

19h15 Wine sampling event at our favourite wine bar. Walking distance from the Hotel de Paris.

20h45 Dinner at "Il Terrazzino".



ADMINISTRATIVE SECRETARIAT  
CHÂTEAU DE LUXEMBOURG - LUXEMBOURG  
11, RUE ALEXANDRE DUMAS  
L-1011, LUXEMBOURG

## Participants

### F.I.U. - Liechtenstein

Mr. René BRÜLHART

Director

### S.R.E. - Luxembourg

Mr. Marco MILLE

Director

Mr. Frank SCHNEIDER

Head of Intelligence

### M.S.S. - Malta

Mr. Francis SCIBERRAS

Deputy Director

Mr. Mark GALEA

Head of FLO

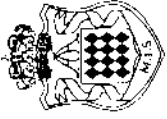
### M.I.S. - Monaco

Mr. Robert ERINGER

Director

Mr. Jean-Léonard de MASSY (JL)

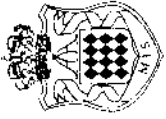
Deputy Director



INTERNATIONAL SERVICE  
OF THE CHURCH OF THE HOLY SPIRIT  
11332, AVE. 2000

## Agenda

- Name of club to be decided.
- Status of membership of other Services.
- Peace association.
- Perspective on Russia post-Litvinenko.
- Upcoming training courses on offer to the Services.
- Topics of mutual interest.
- Next meeting: Venue and date.



MINISTRY OF TOURISM  
MALDIVES  
1991 A.S. 1999

**Useful contact numbers and addresses:**

**JL (M.I.S deputy director)**  
+33 6 71 20 36 35

**Taxi service**  
+377 93 15 01 01

**Hotel Columbus**  
23 avenue des Papolins  
Fontvieille  
+377 92 05 90 00

Ms. Caroline ZAMBRANO speaks English & will assist you.

**BeefBar restaurant**  
42 quai Jean-Charles Rey  
Fontvieille  
+377 97 77 09 29

**Hotel de Paris**  
Place du Casino  
+377 92 16 30 00

**Il Terrazzino**  
2 rue des Iris  
+377 93 50 24 27

**Wine Bar**  
15 galerie Charles III  
+377 99 99 98 00



MONACO INTELLIGENCE SERVICE  
M.I.S



SECRET

SECRET

---

**COLUMBUS GROUP**

**MALTA, JUNE 2007**



**Security Service (MALTA)**



Malta 18<sup>th</sup> June 2007

Dear Friends,


I would like to welcome you to the Island in the Sun, hoping that we will not have any freak weather during your stay.

To consolidate the custom which took off in Luxembourg, our main theme for this gathering will be Work, Wine and Dine. These are ancient pleasures, which combined with the sun and sea, should make your stay a memorable one.

Of course, not diverting from the original inspiration of this group, we will find some time to develop ideas which are of common interest.

Whilst wishing you a pleasant stay, should you require any assistance, Francis my deputy and my other staff, Mark and Josef, would be more than happy to assist you.

Yours faithfully



Godfrey Scicluna  
Head, MSS.

*n.b. Sun block will be available on request.*



## PARTICIPANTS

F.L.U. - Liechtenstein

**Mr. René BRÜLHART** Director

S.R.E. - Luxembourg

**Mr. Marco MILLE** Director

**Mr. Frank SCHNEIDER** Head of Intelligence

M.S.S. - Malta

**Mr. Godfrey SCICLUNA** Head

**Mr. Francis SCIBERRAS** Deputy Head

**Mr. Mark GALEA** A/Head Operations

**Mr. Josef PETRONI** Manager E.R.T.

M.I.S. - Monaco

**Mr. Robert ERINGER** Director

**Mr. Jean-Léonard DE MASSY** Deputy Director

Banca Centrale della Repubblica di San Marino

**Mr. Luca PAPI** Director General



## AGENDA

- Multilateral Service gathering in Monaco on Columbus Day.
- Cyprus membership.
- Secure communications.
- Training programme.
- Topics of mutual interest.
- Next meeting: venue and date.



**PROGRAMME**

**MONDAY 18 JUNE**

- Arrival of delegates
- 1830 Wine tasting at Meridiana Wine Estate, Ta' Qali
- 2000 Dinner at The Medina at Mdina.



**TUESDAY 19 JUNE**

- 1000 Group meeting in Boardroom 1  
(within the Westin Vodafone Business Centre)  
Reception level
- 1230 Lunch at Quadro Restaurant  
Westin Dragonara Hotel
- 1500 Grand Harbour boat trip
- 1930 Wine tasting at Del Borgo in Birgu,  
followed by dinner



**DIRECTORY**

**Mr. Francis SCIBERRAS** (+356) 9923 2193  
**Mr. Mark GALEA** (+356) 7943 0468  
**Mr. Josef PETRONI** (+356) 7946 3370  
**Westin Dragonara Hotel** (+356) 2138 1000  
**Meridiana Wine Estate, Ta' Qali** (+356) 2141 3550  
**The Medina, Holy Cross Street, Mdina.** (+356) 2145 4004  
**Del Borgo, St. Domenic Street, Birgu.** (+356) 2180 3710

**WEDNESDAY 20 JUNE**

**Departure of delegates**



# **EXHIBIT E**

## SECRET AND PERSONAL

TO: H.S.H. PRINCE ALBERT II  
JEAN-LUC ALLAVENA, CHEF DE CABINET

FROM: ROBERT

DATE: 8 DECEMBER 2005

SUBJECT: SIGER

SIGER is Monaco's police intelligence unit. It has a three-person staff with offices in Le Florestan.

SIGER reports directly to the police chief, who reports directly to the Interior Minister. Up until ten years ago, the police chief dispatched SIGER's reports to *both* the Interior Minister *and the Palace*, simultaneously. But this dual-prong chain-of-command was inexplicably changed -- presumably so the Interior Ministry could control the flow of intelligence to the Palace. It is one of the recommendations of this report that the chain-of-command reverts to the previous system whereby the Palace becomes a direct co-recipient of SIGER's work product.

### **SIGER is currently under-staffed and under-resourced.**

In keeping with Minister of State Jean-Paul PROUST's suggestion to create an intelligence service, the answer is simple: *Monaco already has an intelligence unit.* It is called SIGER and it simply needs to be expanded and strengthened.

For the past six months, I have been working closely with two of SIGER's officers, Yves SUBRAUD and Jean-Raymond GOTTLIEB. They have been assisting with my investigations on behalf of Prince Albert's *unofficial* intelligence service, which I direct. (SIGER's chief NEGRE is *not* aware of the *unofficial* service nor its relationship with SIGER. This may sound odd, but it has been determined that, while a good officer and a decent chief, NEGRE does not possess the discretion necessary to be part of our *need-to-know* circle.)

## SECRET AND PERSONAL

SUBRAUD and GOTTLIEB are delighted with their relationship with the Prince's *unofficial* service. Why? For years, SIGER has generated good intelligence. But until SIGER's relationship with me, little if any of their intelligence reporting has reached the Palace. Intelligence findings were routinely buried due to laziness or, worse, corruption.

So: As we go forward, I recommend the following:

- 1) SIGER continues to disseminate its reports as normal, through official channels, but to include the Palace as a direct co-recipient of intelligence, without filtering through the Interior Ministry.
- 2) SIGER continues to liaise with Prince Albert's *unofficial* intelligence service, which reports *only* to Prince Albert and the Chef de Cabinet.

Re-organizing and improving SIGER will not only counter M. PROUST's suggestion to create an intelligence service (a self-serving plan that would allow the Minister of State to control the acquisition and distribution of intelligence), but will also send a clear signal to the Monegasque government and community that Prince Albert is serious about introducing a new ethic to the culture, cleaning up Monaco's image, and clamping down on money-laundering. The message is this: The Prince desires to be extremely well informed, and, so-armed with superb intelligence, He and the Palace will take whatever action is necessary against those who cast shame upon the Principality.

\* **SIGER is under-staffed.** Two more officers are needed. We have identified two police officers who could be transferred from their current jobs to join SIGER:

- Isabel CASTELLI
- Franck TOTTI

These new recruits would be tested for a period of one year to determine their suitability for intelligence work. Meanwhile, SUBRAUD and GOTTLIEB would have more time to work on investigations generated by the *unofficial* service.

## SECRET AND PERSONAL

\* **SIGER needs more office space.** SIGER currently shares its work space with members of the technical services team. If the technical services team are moved to another location, two problems are solved:

- 1) SIGER would be able to occupy the two rooms vacated and thus ensure them the space they need for two new officers;
- 2) Operational security/confidentiality would be improved. (It is absurd that anyone other than officers of SIGER should have access to the SIGER workplace.)

\* **SIGER needs additional funding.**

-- Oddly, SIGER currently possesses none of the technical equipment usually standard-issue for investigators. It is incomprehensible, but true: SIGER investigators do not have access to digital cameras or hand-held recording devices. Each officer should be issued with a digital camera and a mini-disc recorder.

-- SIGER does not currently have access to a fax machine! Two fax machines are needed: one for communal use, the other -- in SUBRAUD's office -- for communication with the *unofficial* service.

-- SIGER, currently, has no capability for encrypted communication. One Enigma cryptographic mobile telephone is needed. This phone would be compatible with those used by the *unofficial* intelligence service.

-- Travel budget: SIGER's senior officers (SUBRAUD and GOTTLIEB) should have funding and flexibility for business travel, to such places as Paris and parts of Italy, for face-to-face encounters with their police intelligence counterparts. In addition, they should be able to travel where and when necessary to monitor the activities of Monegasques and foreign residents of Monaco who become subject to SIGER investigations.

-- Entertainment allowance: SIGER's senior officers should receive a modest monthly allowance to entertain valued informants. (Palace bodyguards apparently receive 700 euros per month for this very purpose, although they have no need for this expense and are said to keep it for themselves.)



## SECRET AND PERSONAL

-- SIGER's senior officers should be issued tickets to Monaco's premier events (The Grand Prix, the Circus Festival, the Yacht Show) to entertain prized informants.

-- SIGER does not have use of a motor vehicle. A second-hand, very ordinary Peugeot or Renault, with French plates, should be requisitioned for SIGER's exclusive use. This is needed for both surveillance and general purposes.

\* **SIGER needs greater powers.**

-- SIGER's senior officers should be allowed access to Monaco's banking system. Monaco has no central banking registry of its own. Currently, new account applications are sent directly from Monaco financial institutions to the Bank of France for vetting. Hence, Monaco is not able to effectively police its own banking system. Solution: SIGER should create a banking registry. The compliance officers of all Monaco-based financial institutions should be held accountable to SIGER and should supply, upon demand, whatever information is sought from investigators on account-holders. Furthermore, new account applications at all Monaco banks and financial institutions should be routinely submitted to SIGER for vetting and approval.

-- SIGER should vet all applications for residency permits and Monegasque nationality.

-- SIGER should have access to Monaco Telecom and hence all telephone records.

\* **Insulation.** One of SIGER's biggest problems is a fear of retribution from senior government officials. SIGER's officers must be able operate with the independence and authority to investigate corruption and criminal wrong-doing at the highest level of government, without worry that their careers may suffer or their employment be put in jeopardy for simply doing their jobs. Any police or government official who tries to tamper with a SIGER investigation should be strongly and swiftly reprimanded.

\* **Accountability.** It should become known that SIGER is accountable, ultimately, to the Palace -- to the Chef de Cabinet and the Prince, *not* to the Interior Ministry.

## SECRET AND PERSONAL

\* **Sourcing.** SIGER's sources and methods should never be compromised. Neither the police chief nor the Interior Minister should have authority to demand the identities of SIGER's sources. Consistent with the accountability issue addressed above, SIGER should be accountable for its sourcing only to the Chef de Cabinet on behalf of the Prince.

\* **Beausolei:** Yves SUBRAUD is Monaco's resident police expert on the Islamic Fundamentalist community in and around Monaco. His reports have pinpointed Moslem Fundamentalist enterprises and activities in Beausolei, along with a criminal youth element that is literally seconds away from the Principality's streets. In view of recent rioting throughout France, it is SUBRAUD's concern that publicity deriving from just one torched car *across the road* from Monaco would cause damage to the Principality's image. SUBRAUD believes that Monaco's border with Beausolei is not currently well policed. He believes the perimeter can be secured with a single mobile patrol.

**END NOTE:** Prince Albert has voiced a suggestion that he replace SIGER's chief, NEGRE, with Yves SUBRAUD. I have discussed this proposed leadership change with SUBRAUD and GOTTLIEB. They believe it is unnecessary at this time to replace NEGRE as chief. Although NEGRE does not fit into the *need-to-know* circle of the unofficial service, he is a competent and honest officer and should be allowed to finish his term, one year more. His natural successor would then be SUBRAUD, a captain who has spent almost thirty years on Monaco's police force and whose loyalty to Monaco is unquestioned.

# **EXHIBIT F**



**THE PEOPLE.co.uk**

GRRR. IT'S GOING TO BE

**BIG**Search  The Web  forHome | **News** | Sport | People Money | Showbiz | Play for CASH! | Dating | Motoring | More >**News >** Eamonn Holmes | Voice of the People | Letters

18 December 2005

**THATCH YER LOT****Monaco move is at risk***By Nigel Nelson*

SHAMED Mark Thatcher has moved to Monaco - a favourite haunt of British tax exiles.

But his hopes of setting up home in the exclusive millionaires' playground could be short-lived.

Ruler Prince Albert has vowed to clean up the image of the Mediterranean state by ridding it of convicted crooks.

The 52-year-old son of ex-Premier Margaret Thatcher was fined £265,000 a year ago for his part in a failed coup in Africa.

Thatcher checked into a £2,600-a-month suite at Monte Carlo's Fairmont Hotel in July.

Government sources say he is trying to get permanent residency - which would allow him to use the principality as a tax haven.

But a Palace insider said: "Prince Albert has made it clear that shady people are unwelcome.

"We'll be investigating Mark Thatcher's presence with a view to rescinding any residency."

Thatcher lives with his increasingly frail mother when he is in London.

But the law means he will only be allowed to spend three months a year in the UK if he moves to Monaco - where there is NO income tax.

Thatcher was convicted in South Africa for helping to fund a failed coup in Equatorial Guinea.

He tried to join his Texan wife Diane and their children in the US but was refused a visa. The couple are now divorcing.

Thatcher was last night unavailable for comment.

nigel.nelson@people.co.uk

Print article Email to a friend

Fun &amp; Games | Gaming | Pets &amp; People | Competitions | Holidays | Ticketmaster | Leisure Guide | Real Life | More &gt;

Home | **News** | Sport | People Money | Showbiz | Play for CASH! | Dating | Motoring | Fun & Games | Gaming | Pets & People | Competitions | Holidays | Ticketmaster | Leisure Guide | Real Life | Contact Us | Horoscopes | Terms and Conditions | Privacy Policy | Site Map

Advertisement

**YOU THE MANAGER**  
**£275,000****NEW**  
**WEBSITE..****..MORE**  
**PRIZES****£275K**  
**TO BE**  
**WON****CLICK**  
**HERE**

with

**betNOW** →

# **EXHIBIT G**

# *Gavin de Becker*

March 3<sup>rd</sup>, 2006

*Confidential*

Thierry LaCoste  
Robert Marx

Gentlemen, I'm about to go outside the normal way of doing things, to the degree there is a normal way in such situations.

My name is Gavin de Becker. We live in the Google era and also you have Robert Eringer's insights and resources to fill in any blanks, so I'll make just a short introduction.

For 30 years, I've advised public figures, Government agencies, and nations on high-risk situations, mostly situations involving danger. I help iconic public figures manage many aspects of public life, including situations like the one you are currently seeking to manage.

Some months ago I was asked to serve as a Trustee for Jazmin, and I had several questions for her. With her mother's encouragement, I've gone directly to Jazmin to learn her feelings about this situation, what she most wants, what encourages her, and what hurts her.

Jazmin and her mother have asked me to communicate with you on their behalf, in a non-lawyerly way. We have a lawyer in place, Marty Singer, with whom I have worked on many high-stakes matters. Also in place is an attorney who practices family law. My heartfelt suggestion at this point is that we have an informal dialog, a dialog that is without the posturing, threats, and strategy of many lawyer-to-lawyer negotiations. You will soon be able to determine which resolution Jazmin is most likely to pursue, and if it's an agreement with Prince Albert, then we can get it very close to done, and have Marty Singer merely review it for Jazmin and her mother as the last step.

If, however, we bring Marty Singer in right now, we're back to lawyer-to-lawyer negotiations, a process that, as you'll read below, stands in the way of the best resolution. When you met Jazmin and her mother they both felt intuitively that you'd rather have spoken to them without Moses being present. Jazmin said at one point, "You must have many questions for me" (a comment so telling of her heart, that you/her father would be curious to know her better). You (Thierry) said "Actually, many," but Moses interrupted, often. The kind of informal communication you might have wanted is now possible, and even advisable. I am covered by California's statutory confidentiality requirements, so please join me slightly outside the traditional ways people seek to manage these situations.

Yesterday, your office advised Tamara that you could only communicate with her lawyer, and if that remains your wish, then please draw whatever benefit and insight you can from this letter, and I'll get you and Marty Singer together after that. Understand that we don't want a lawyer involved at this point, preferring direct communication, but we'll respect your decision if you insist, and you'll be asked by Marty to pay his fees along the way, since it's your wish to deal with a lawyer. If we communicate directly and wait until an agreement is further along, Jazmin will pay Marty for a final review. In your hands at this point.

To answer a question I imagine could arise, I am not being paid anything and expect no compensation from anyone in this matter, at any time. I am a wealthy man who has been wealthy a long while, doubly so given that I started on welfare, food stamps, with a heroin-addicted mother, our family financially and emotionally abandoned by my father. (And there you can begin to theorize about what might motivate me to help Jazmin, her mother, and even Prince Albert.)

The drawn out negotiation and the straying from the originally-proposed agreement, and the process of making what might seem to you to be small changes has had an unintended side-effect: **It has compelled Jazmin and her mother to assess, for the first time, options they never fully considered.**



The idea of Jazmin publicly owning her identity has now been given actual shape. We're not talking about accepting \$400,000 from the National Enquirer, or taking any other smutty avenues that hurt everyone and benefit nobody (except the publishers of sleazy tabloids and the news business in general).

A much different path is being explored – and when we see that it might actually be more healthy for Jazmin to own her situation and to share her situation to the benefit of millions of kids who are abandoned by fathers – when one sees that the path of doing a book, for example, brings financial value in the form of a publisher's advance that's about the same as your proposed agreement, well, one must give serious thought to an option that was previously out of everyone's thinking (everyone on this side anyway).

In my work, I most often prefer the non-public path when that's an option, and that's the path Jazmin and her mother chose for 14 years. And then something happened, something in your proposed agreement, something that does not feel right to anyone here, and probably doesn't feel *entirely* right to anyone there either: the insistence that Jazmin substantially delay any announcement of her relationship to her birth father.

This feels to her like a contracted restriction against being who she is – after a lifetime of already not being who she is. It was also a significant deviation from the agreement originally proposed, which allowed her a simple and truthful answer when asked who her father is.

When I saw how Jazmin reacted to the idea of smothering her true identity, and the idea of doing an important book, I remembered my own experience: Though I had led a life that was sometimes public, I'd always avoided discussion of my personal history. Then in 1997, I wrote a book that includes some of my own history with violence as a boy, a book that reveals the relationship between my childhood experience and my adult work, and ultimately its relationship and relevance to all of us. The book helped and helps many people. It became the #1 bestseller in America and Canada, spent four months on the NY Times Bestseller List, and is now published in 14 languages. It was featured several times on Oprah Winfrey's show, Larry King Live, was featured for three weeks in a row on Prime Time Live, was the subject of a two-page center spread in Time and other magazines, and every major newspaper. In short, it had a meaningful impact – and making that contribution required that I surrender some of my privacy.

Recalling my own experience led to a frank exploration of the issues Jazmin is facing today, and to this: Perhaps Jazmin is the appropriate author of an important work that can help children and families affected by father abandonment. Perhaps a book written by a 14-year old (her age itself being a powerful and intriguing factor) might express the heart of the matter.

Once a reader or reviewer or interviewer gets past the fact that this particular abandoning father is one of the world's most famous monarchs, we are left with a girl's experience that can enlighten and help many people. It's a common story: A father knows his daughter exists yet doesn't care for her, meet her, or even acknowledge her.

Why did that happen in Albert's case, since he could have supported her even if he chose not to know her? We're told that his father prohibited it. While one can readily accept the pressures and repressions of a public royal life, a few thousand miles away from Monaco is a young girl who knew nothing of politics, pressures, repression. She knew only that her father had no interest in her. In the current situation, she watches as the negotiations indicate that her father wishes she didn't exist at all – he actually seeks to require her by contract to be the Invisible Girl or else suffer continued financial stress.

This very week, her birthday week, she reads more denials of her existence in the news, quotes from her father about it being “impossible” she is his daughter – public statements made *on the very day* she is being pressured to sign an agreement. Another news story has a quote from her father characterizing those who make claims of paternity as “jumping on the bandwagon.”

Even those who don't believe Jazmin is Prince Albert's daughter ask why he doesn't do a DNA test, just to put the matter to rest, saying it would help the deluded girl get on with her life. Even strangers on web sites have compassion for the “deluded girl.”

It's clear to me there could be profound benefit to many young hearts who might find a voice in Jazmin. I recalled speaking with Brooke Shields, my dear friend of twenty-five years, as she faced similar decisions before writing Down Came the Rain, the book that discloses her struggles through post-partum depression. I resolved to get Jazmin and Brooke together to

discuss the benefits and costs of taking a public position on an issue of such personal import. I had a clear vision of Jazmin on Oprah's Show (a client and friend of mine), and on Larry King (whom I know well), and being interviewed by my friend Elizabeth Vargas on ABC News, and being interviewed in Time & Newsweek – not about Albert as a monarch, but about a girl's experience when her father elects to un-know and invisibilize her.

After establishing an agreement of confidentiality, I confirmed that a book by Jazmin intended to help heal both author and reader is attractive to publishers. There has never been a book written by a fourteen year-old that has the gravity of what I am sharing in this letter – and sharing is the right word, for there is no threat implied or even considered here.

My purpose in sharing everything with you is to be certain on Jazmin's behalf that she has exhausted every option that could lead to the preferred outcome: That Prince Albert becomes her father more than merely biologically, that he becomes part of healing the past rather than merely a victim of the past.

Jazmin wants a relationship with her father, and she wants and deserves his support, too. She also wants her healing, and she has been clear throughout that she did not wish to be made invisible. Others might have wished she not exist, but she's unwilling to participate in her own depersonalization.

Jazmin resists the idea of being prevented from sharing her identity with friends, family members, or even the world at large if she someday wishes. At the same time, she respects her father and his situation – and would love (note of that word), would love to have a relationship *with* him rather than merely a public relationship *to* him.

Another important factor about which you should be aware: Though the single-payment amount you proposed would not even have reimbursed Jazmin and her mother the hard-to-earn, hard-to-find money spent raising Jazmin these 14 years, **Moses Lebovits is planning to take \$350,000** from that amount (yes, in addition to the \$50,000 from your side).

In Moses' own words from an email last week:

**"The fee is one third and the deduction for the advance we gave you. Your net after fees and reimbursement for the advance is \$687,863.34.**

**Gross = \$1,049,795.00 Less fees- 349,931.00**

**Less costs (waived) (We have \$18,670.24 in costs but will reimburse that from the \$50,000 to be paid by Albert which reduces our fee from that share considerably and is an accommodation to you)**

**Less advance- 12,000.00**

**Net to client - \$687,863.34"**

After one deducts the substantial current debts that Jazmin and her mother have, debts accrued through years of meeting Jazmin's needs, your proposed combined amounts for Jazmin and her mother do not meet by even half the advance on a book. And a book, if a good and valuable one, could sell for years, perhaps becoming a standard for helping abandoned kids deal with their wounds – and a book can bring other personal benefits to Jazmin that money cannot bring.

Alas, Jazmin must weigh her options comparing much more than money, so let me move to the heart of the matter and reframe my points as if I were addressing Prince Albert directly on Jazmin's behalf (and indeed, I ask that you share this writing with him). Monarchs deserve respect, and the highest respect I can show the Prince is to share the truth as it expresses itself to me, and as Jazmin has described it to me.

\*\*\* \*\*

Dear Prince Albert:

I know your daughter Jazmin and hope one day soon you will know her too. I believe it will be healing for both of you. There's an irony in the present situation that can be enlightening to all of us: As could predictably occur in a family so public, you were told throughout your life to be this and that, told not to be this or that, placed in a box of public and family expectations. You, who no doubt at times controlled and suppressed what you might say or do – you, who was no doubt controlled at times by people and circumstances that did not care about or want to even know your true self, you are now asking to do that to your child. You are telling her not to own her own self, not to be who she is.

Indeed, we can rationalize this by saying it's in her interest to be spared the challenges of public life. We collectively know so much about those challenges that we can make a great case, but alas it's her call to make, her path to travel. It might very well evolve that Jazmin decides to never say a public word about you being her father. But to require in a contract that she be the Invisible Girl, the girl who was never born, to compel her to do that or else have no financial support, to compel her to do that if she wants to attend university, or in order to please a father who did not want her... it amounts to cruelty, unintended cruelty perhaps but cruelty nonetheless.

Jazmin has already been the Invisible Girl for no compensation, and it has already caused her pain. I would not do what she is being asked to do for 100 times \$75,000 a year, and you would not do it - though it's likely we both have done it at times in our lives.

Can you imagine how painful it was for Jazmin to read news stories like the current one that says you felt it "impossible" you are her father? Or to see the many web sites containing speculation and theories about whether she is "for real"? Or web sites with percentage-polls about whether Jazmin is your daughter? Or to see people on chat rooms and web sites accepting the fact that you are her father more than you have?

A problem your lawyers now face is that they have only one thing to negotiate with: Money. But compensatory money cannot compensate for unlove, or for a father wanting her to disappear.

Jazmin's becoming an unlikely yet uniquely qualified champion for an important cause - that might be very healing to her. *If she cannot have her true father, then she can at least have her true self.*

Your Serene Highness, I am going to set aside some protocol and write from deep in the gut, with pure frankness: It is never too late to heal. I did it with my father, who abandoned my sister and me when I was five. My father and I are close friends today. Each of my eight adopted children, all estranged from their birth fathers, has begun to heal those wounds, and six of them have now met their fathers.

Jazmin is not shakedown artist – she is your daughter, your blood and your parents’ blood, and it might well be that you too can benefit from the healing she extends to you.

Now, however, rather than healing, continued harm is being done. The most recent news story about Jazmin indicates that you might sue a publication for saying she is your daughter, in effect denying again that she is – so painful. Though you might (in France) prevail in some of these cases, if Jazmin writes in her book that you are her father, she cannot be successfully sued, for she and her mother know to an absolute certainty that you are her father. Even the idea of getting to such an adversarial place with one’s own daughter is outrageous, and you likely agree. Further, taking a position that Jazmin is not your daughter limits your own future options.

“The prince estimated that it was impossible that there was a paternity” was published, with painful irony, the very same day your representatives have asked Jazmin and her mother to sign an agreement with you.

Were they to sign that agreement, and were you to withhold the announcement that she exists as your daughter until after her 18<sup>th</sup> birthday, I imagine your best-case news story four years from now would be something like this:

“HSRH Prince Albert of Monaco today confirmed that he has an 18-year old daughter whose identity has been kept confidential for many years in order to allow her as normal a life as possible. Prince Albert has supported the girl, who is currently a student at Princeton University.”

This best-case story would leave readers believing that you had supported Jazmin throughout – **but what if you could have an even better public presentation today?** What if a statement could include Jazmin’s quote:

*“I have been well cared for all these years – and I am grateful to my father for his generosity and support”?*

You see, if divided in half, the statement could be true: Jazmin *has* been well cared for all these years; and, she could be grateful to her father for his generosity and support. That part is up to you.

My hoped-for resolution would be a statement that answers anyone's questions about why Jazmin's relationship to you has been kept secret:

***“Prince Albert and Jazmin’s mother both agreed that a non-public life would be best for Jazmin until she was old enough to make that decision for herself.”***

The statement is true in that you did both agree on this point -- and the impression communicated by the statement is that you have met your paternal obligations throughout. Jazmin would present to the world that that you have done your part, met your obligations (without discussions of when you met them), and that you elected to protect her from public life, and that she was well cared for, and that the two of you have a fine relationship.

Isn't that the best possible public resolution? And the best possible private one?

Jazmin makes the point to me that her becoming public, and managing whatever attention might follow, is actually better while she is 14 because she's still in the care of her mother. I agree with her that today, living at home, she is more resistant to the challenges and even the risks of being public than she would be if the heat of publicity occurred when she was 18, perhaps going to school somewhere, and with none of the protections (legal and otherwise) that we could claim for a minor.

It's understandable that there's been focus on how Jazmin -and the mere existence of Jazmin- might harm you or cause you hassle and distress. But have you had the space to wonder how she might enrich your life? To see her as member of your family who is elegant and capable? Have you had the space to consider her as an ally in your public works? ***To see her as someone who actually adds to the integrity and future of the Principality – not just someone who can undermine public confidence and respect for the Principality?***

Consider the ideal situation: You and Jazmin growing to be father and daughter, with every public presentation being designed to present you and your daughter in the best possible light. In the ideal situation, just as you **want** to know Jazmin, she **wants** to support both you and the Principality.

Imagine Jazmin, whom you will learn is poised and intelligent and kind – imagine her one day speaking publicly on behalf of your interests. Imagine her, poised and graceful, hosting an event for you, sharing some of your public responsibilities. That might not happen, I know – but I also know it could happen. Jazmin’s grandmother, after all, is your beautiful mother, and right in her cells, Jazmin has the history of your family. You and she share so much – and yet obstacles stand in the way, I know.

Dear Sir, we are discussing someone who very possibly might evolve into a great gift in your life. It’s not the role of lawyers and protectors to think that way – but it’s my role as father of eight to share with you that they are major gifts in my life.

If the option of writing a book emerges as a better choice for Jazmin, (i.e., if she cannot have a fair and meaningful relationship with her father), it seems likely that public perception of your past and present actions will be full of harsh judgment. To many observers, abandoning a child cuts right to the character of a man. I am not myself passing judgment here, for *I have been the son and I have been the father*. I have not been in your shoes, of course, and I leave lots of room for acceptance and healing, no matter what the past – and Jazmin does too.

She said to me a few days ago, “I respect my father and his situation; I just want to understand him better.”

Even as I type the words about healing, I realize that in this odd life it’s possible the greater healing for you comes through Jazmin writing a book about her life without a father, about her father who did not support her though he is a Prince – a father for every girlish fantasy, and yet an actual father to no girl. There are plenty of people you and I both know who need to be villains in their own stories before they commence their own healing.

I certainly have no way to predict the future, and at this moment all I can tell you is that while financial needs are an issue – amends of the heart is *the* issue. The only thing you can provide to Jazmin that isn’t provided by her pursuing her own public life – is her father. That is your negotiation leverage. Unlike many things that can be handled by others, nobody else can do this for you. The question is: Can you do this for you?



The past 14 years have already taught Jazmin and her mother how to live without any financial support, so they don't come to your table in desperation. The situation has already taught Jazmin to live with an idea of her father instead of her father. It would be sad to replace her imagined father with an actual man who demands that she submerge her true self, a monarch who offers her the financial support a moderately successful dentist in America would pay after a divorce.

You now have it in your hands to design and preserve the image of your choice, and to make that image true. Negotiating lawyer-to-lawyer with your daughter – sending lawyers and detectives to manage away her existence... that's not likely the image of your choice.

Were you my client or my friend, and were I faced with this exact set of circumstances, here is what I would recommend, all the while keeping firmly focused on creating the best possible public outcome for you, Jazmin, and the Principality:

1. Complete an agreement that is simpler, with far fewer items prescribed in detail. For example, replace prescriptive items in the agreement, such as "a car costing no more than \$30,000," with text that expresses your intention: "I'll get you a suitable and safe car when you have a driver's license and when it seems you're ready." This will actually give you more control along the way, and will remove the feeling of limitations being imposed. In effect, you'll do what you choose to do, what you feel is right, when you feel it's right.
2. Leave the issue of restricting Jazmin from being who she is out of any agreement. If it's your wish, seek to persuade Jazmin that remaining non-public is better for her and for you and for your relationship (include your own interests because there's nothing wrong with self-interest). Do not require her by contract to accept your view, but let it emerge in freedom, allowing her the chance to "listen to her father."

If it turns out she feels strongly about publicly owning her true identity now, then make an announcement that places you both in the best possible light, and affords the least unfavorable attention or speculation, e.g. Jazmin's quote:

*“I have been well cared for all these years – and I am grateful to my father for his generosity and support,”* and your quote that *“Jazmin’s mother and I agreed that a non-public life was the best choice until she was old enough to make that decision for herself.”*

3. If you wish, put in your Letter of Agreement that you and Jazmin must always agree on the wording of public statements, or place approved statement text in the agreement (as in the paragraph above);
4. Seek to meet your daughter and begin the process of developing a relationship now, while she is 14, recognizing that each year you delay, there will be more obstacles to healing. Leave the detailed prescription of how and where you’d meet Jazmin out of any agreement. Instead, *want to* meet her and know her;
5. Take generous care of Jazmin’s mother, for she took good care of Jazmin these fourteen years. Understand that reimbursement and compensation provided to Jazmin’s mother improves the quality of life for Jazmin, who will likely be living with her mother for some years;
6. Be financially fair with Jazmin. This doesn’t mean enriching her outrageously beyond her needs. For example, remove the idea that Jazmin pays for her education from her monies, expressing your intention far more simply: “I will pay for your education for as long as you pursue it.”
7. Remove the detailed prescription for vacations, replacing it with “I will pay for you and your mother to enjoy vacations each year.” (Of interest on this item, Jazmin’s mother has already managed to provide Jazmin with lots of world travel, and your offer of \$15,000 a year was not compelling as the offer didn’t really change anything for them.)

8. Without having to make every decision today, commit to Jazmin that you'll establish a trust fund that provides financial assistance through her life (30 years old, 35 years old, 40 years old, etc), demonstrating that you intend to care for her, and that you care about her. If you have a philosophical objection to trust funds and the like, teach her your views;
9. Do with your heart that which cannot be done via contract (show interest, give some of your time, be her father, seek healing);

I know you've met my friend Lauren Hutton. A few years ago she told me about her relationship to her father. Lauren was born while he was overseas serving in the military, and he wrote her this letter before she could even read:

*You and I have never been formally introduced, but I feel confident my writing you will not be irregular. You see honey, I'm your daddy. And I want to welcome you into the family. I know you are going to be a very pretty addition. I don't even know your name yet – anyhow I am going to leave that up to your mother. I am sorry I couldn't be there to personally greet you, but I have to help "make the world safe for democracy" – sleep tight, darling, and dream of all the big things that are before you. Bless you, precious. Your Dad*

Lauren never did meet her father because he was killed in action – and this letter, these few words, sustained her for sixty years. She knew and she knows that her father cared about her. I don't believe for an instant that you would wish for your daughter to have anything less.

Design and preserve the image of your choice. Jazmin stands ready to help you do that.

With respect –

Gavin de Becker

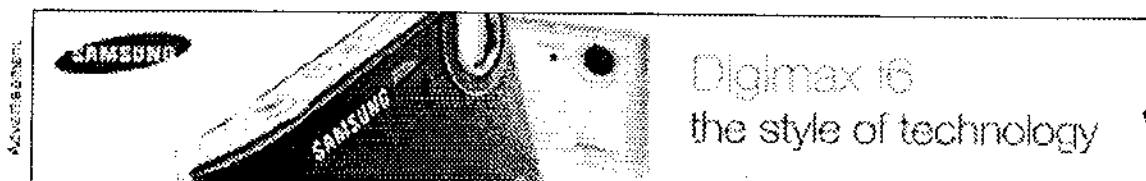
**Thierry and Robert:**

**You can contact me via email, which is best, or via telephone: 818 505-0177  
Extension 3110. I wish it weren't so, but there is a time factor because Jazmin  
wants to commit to one course or the other, and others have their reasons to press  
her to hurry. Plus, waiting has itself become painful. Thanks - GdeB**

# **EXHIBIT H**

Search

How do I find it?



Home

News

Travel

Money

Sports

Life

Tech

Weather

Money

Inside Money

Shopping Buy

GET A QUOTE:

Enter symbol(s) or Keywords



DJI 11,193.36 ▲ +66.03

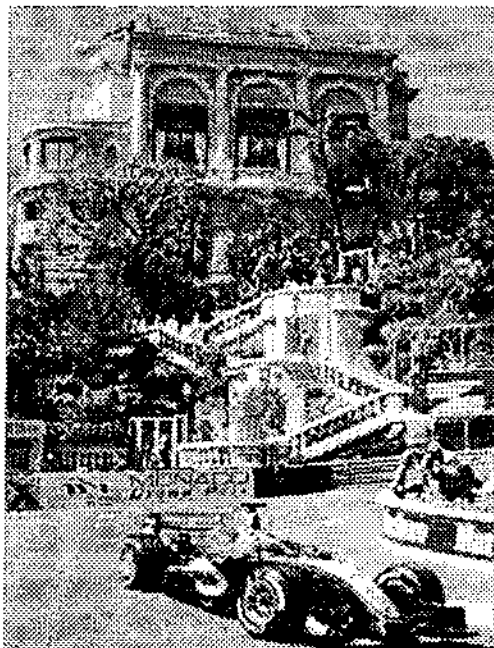
NASDAQ 2,196.54 ▲ +23.86

## Monaco steers clear of once-shifty image

Updated 5/23/2006 3:47 AM ET

E-mail | Save | Print | Reprints &amp; Permissions | Subscribe to stories like this

Rela

Per  
wwe-S  
wwLea  
ww

Enlarge

By Claude Paris, AP

Colombian driver Juan Pablo Montoya steers his McLaren Mercedes past the Monte Carlo casino during practice Thursday for this week's Grand Prix.

### MONACO'S ROYAL FAMILY

#### PRINCE ALBERT

**Born:** Albert Alexandre Louis Pierre, Prince of Monaco, Marquis of Baux, on March 14, 1958, in Monaco. Son of Prince Rainier III, Louis

By Jeffrey Stinson, USA TODAY

MONACO — Casino gambling. A fairy tale palace. Yachts in the harbor. The Monaco Grand Prix, which returns here this week for the famed Formula One auto race through Monte Carlo's streets and past its jet-set beaches.

Of all of the images that this tiny principality on France's Riviera coast evoke, there is one that its ruling monarch, Prince Albert II, son of Prince Rainier III and the American actress Grace Kelly, wants to erase

That's British writer Somerset Maugham's description of Monaco as "a sunny place for shady people." Or, more to the point, the image that Monaco's penthouses offer refuge to scoundrels, and its confidential bank accounts provide a haven for laundered money.

"I don't want Monaco to be perceived that way," says Albert, 48, who, when he took Monaco's throne last July 12 after the death of Rainier in April 2005, declared that "money and virtue must go together."

Since then, Monaco has cracked down on what Albert calls "people who have had doings with illicit activities" and has declared *persona non-grata* anyone with a reputation that the prince doesn't care for.

"We're not going to tolerate the presence of people or allow people who are passing through to establish residency here if their reputation precedes them," Albert told USA TODAY in an interview in his office, which used to be his mother's, in a turret atop his palace. "I don't think we were always careful in the past. Now, we are."

Henri Maxence Bertrand, Sovereign Prince of Monaco, and Princess Grace Patricia Kelly.

**Family:** Unmarried. Acknowledged in May 2005 that he was the father of Alexandre Coste, child of Nicole Coste, a former flight attendant from Togo.

**Education:** Amherst College, bachelor's degree, political science, 1981.

**Military experience:** Ensign, French Navy Helicopter Carrier "Jeanne d'Arc," September 1981-April 1982.

**Training:** Various financial, advertising and international law firms in New York and Paris, 1983-85. Worked for father in the palace from 1986 until ascending the throne.

**Sports, expeditions:** Competed in the bobsled in the 1988, 1992, 1994, 1998 and 2002 Olympics. Member, International Olympic Committee. Traveled in April to the North Pole, following in the footsteps of his great-great grandfather, Albert I, and to highlight effects of global warming. Is Antarctica next? "There are some scientific stations there I'd like to visit," he says.

**Succession:** Unless Albert marries and produces an heir, the throne would go to Caroline, then her children. (The principality's constitution dictates that succession comes in order of age, although it favors males of equal kin. Only offspring of a Catholic marriage can ascend the throne, so Alexandre Coste could not be heir.)

#### PRINCESS CAROLINE

**Born:** Jan. 23, 1957.

**Family:**

- Married Philippe Junot 1978, divorced '80.

- Married Stefano Casiraghi 1983.

Three children: Andrea, June 8, 1984;

Charlotte, Aug. 3, 1986; Pierre, Sept. 9, 1987. Casiraghi died 1990.

- Married Prince Ernst of Hanover 1999. One child: Alexandra, July 20, 1999.

#### PRINCESS STEPHANIE

**Born:** Feb. 1, 1965.

**Family:** Twice married and divorced. Three children: Louis, Nov. 26, 1992; Pauline, May 4, 1994; Camille, July 15, 1998.

Sources: Government of Monaco, USA TODAY research

In addition, Monaco has worked to comply with European Union banking regulations and to get itself off a list of allegedly "uncooperative tax havens," posted by the Organisation for Economic Co-operation and Development, the Paris-based group of 30 nations, including the United States, that are committed to spreading democracy and market economies.

For instance, Monaco in the last year has:

- Told Sir Mark Thatcher, a son of former British prime minister Margaret Thatcher, on Dec. 11 to leave this summer when his temporary visa runs out. Sir Mark had sought permanent residency in Monaco last year after being denied an entry visa to the USA following his conviction by a South African court for plotting a coup in Equatorial Guinea.
- Frozen about \$25 million from the local branches of two Swiss banks at the request in January of Sicilian authorities who prosecuted Francesco Zummo, a Sicilian businessman charged with aiding and abetting the Cosa Nostra, Italy's Mafia.
- Pressed ahead with the prosecution and trial of American William Hobbs Fogwell, his daughter Shelley and three other associates of the Hobbs-Melville brokerage firm based in Monaco. They were accused of defrauding up to 500 clients of about 140 million euros (about \$170 million) from 1993 to 2000. Prosecutors are seeking five years imprisonment and fines of 90,000 euros (about \$115,000) each against the Fogwells. A verdict is set to be announced July 12.
- Began on July 1, 2005, to comply with the European Union's directive to impose a withholding tax on the interest income of EU citizens earned in Monaco accounts and rebate it to the account holder's country. Monaco's government also agreed to provide bank account information on request in criminal or civil cases of tax fraud, while maintaining most confidentiality.

To enforce Albert's wish that Monaco shed its shady image, his government has beefed up its intelligence operation to monitor people's comings and goings and its accounting staff to scan the source of funds coming in to the principality.

"We have access, with certain intelligence, to where people come from and what their activities are," says Jean-Luc Allavena, director of Albert's Cabinet in this constitutional

monarchy

Allavena says that the principality responds quickly to every request from any nation about the source of money in Monaco bank accounts. In addition, he says, the 50 banks and 20 other financial firms here have been "sensitized" to the prince's desires. Bankers know that "you cannot just close your eyes and get money when it arrives," he says.

"There are a lot of good reasons for people to come here," Allavena says. "But we want people that are actively involved in life here. It's important that they know what the rules are."

**A tiny strip of land**

Monaco, a strip of land three-quarters of a mile long on the Cote d'Azur, is on the southeastern-most part of France. The principality is a little more than half the size of New York's Central Park.

its beaches, yachts, the palace atop the hill, the grand casino, high-speed cars racing through the streets and even James Bond-like characters remain essential parts of the tiny nation

This week, for instance, is the 64th Monaco Grand Prix, where Formula One drivers race through the streets past the beaches, harbor and beneath "the rock," where Albert lives and rules from his Palace Princier, as his Grimaldi family has since 1297.

The palace, the color of Grey Poupon mustard under the sun and pinkish under the lights at night, is where Albert's father, Rainier, whisked "America's princess," Grace Kelly, off to live after their 1956 royal wedding.

The drivers also will race their Formula One Ferraris, BMWs and Mercedes in streets below the winding mountain roads where Grace Kelly and Cary Grant were chased by police in the 1955 Alfred Hitchcock thriller *To Catch a Thief*. That's also where Princess Grace was killed in a car accident in 1982.

The grand casino is still here in Monte Carlo. The dinner jackets, however, have given way to tourist garb, just as gambling now comprises less than 6% of the principality's revenue. The number of tourists continues to rise — to 285,675 last year, up 14% from a year before. For 10 euros (about \$12.75), visitors can enter the casino and receive two 5-euro chips with which to gamble. Retail and wholesale sales comprise about 39% of economic activity.

As for James Bond, well, one of the men who played him on film, British actor Sir Roger Moore, has a residence here. John Haly, a British expatriate and owner of the English-style pub *Ship and Castle* in the Fontvieille section of Monaco, says Moore is well known figure around the city. "I bumped into him buying bananas at the store," he says.

Dame Shirley Bassey, who sang the title songs to the Bond films *Goldfinger*, *Diamonds Are Forever* and *Moonraker*, also has a place here. Like Moore, she often is seen at many of the charitable balls and galas Monaco hosts annually.

One of Monaco's attractions for the British is that Monaco's residents pay no tax on personal income, capital gains or inheritance on personal trusts unless they are French nationals. French citizens in Monaco, a protectorate of France, must pay income and wealth taxes, as do all French.

About 6,000 British can be counted among Monaco's 32,000 residents, compared with about 300 citizens of the USA, whose tax laws don't make residency here that advantageous.

Monaco keeps tabs on who comes in by having guests surrender their passports at hotels, which send the information to a central registry to be checked. It also keeps track of anyone who might abuse its residency requirements — six months and a day in the principality each year — by checking utility bills and even telephone records.

There are other reasons Monaco is attractive to people who can afford the one-bedroom condos that can sell for an average of \$1.3 million or three-bedroom condos that go for \$2.9 million.

The principality, which has one police officer for every 100 residents, is considered safe. Uniformed police officers are in evidence, as are security cameras. "For every policeman you see in uniform, there are two in plain clothes," says pub owner Haly.

All of this adds up to a desirable place to live, says real estate broker Pierre Mare, who like many business people here supports Albert's efforts to clean up Monaco's image. Mare also approves of Albert's vision for this city-state for the 21st century.

#### **An American-style executive**



Albert, who has the title "His Serene Highness," or HSH, graduated in 1981 from Amherst College in Massachusetts and says he is "very proud of my American heritage." He has adopted a straight-forward American corporate-style of governing, with goals and strategies for achieving his vision.

He says he wants Monaco to be known for "excellence" in everything that it undertakes, not just as a clean and virtuous financial center free from its early 20th century reputation as an outpost for arms brokers, ousted royalty, Mafia, gamblers and other ne'er-do-wells.

"To have your country portrayed as a haven for scoundrels, if that's the word you want to use, I don't really like that," Albert says. "I want people to find excellence when they visit here."

He has plans to attract more light industry, bio-sciences and educational institutions, which will in turn help the principality develop higher-skill jobs through grants and tax incentives.

To help his principality grow, he plans a new commercial and residential addition outside the port area. As an ardent environmentalist who trekked to the Arctic last month to highlight concerns over global warming, Albert insists that the addition be built on pilings rather than landfill, and that none of the new buildings be higher than 10 stories so as not to disturb Mediterranean sea life. "Our limitations (in size) don't mean that we can't do things in the right way," he says.

"He is doing a very good job," Mare says of Albert's first year on the throne. "I'm not the only one who thinks so. He has new ideas and probably 30 years to do them. So, it's good."

Posted 5/22/2006 11:13 PM ET

Updated 5/23/2006 3:47 AM ET

E-mail | Save | Print | Reprints & Permissions | Subscribe to stories like this 

Related advertising links [What's this?](#)

[Place your ad here](#)

**AAA Motorsports**  
AAA is the sponsor of Mark Martin and the #6 Ford Fusion.  
<http://www.aaa.com/m...>

**Monaco, Monte Carlo Hotels**  
Read reviews, compare rates and find deals on hotels in Monaco  
[www.TripAdvisor.com](http://www.TripAdvisor.com)

Advertisement



Newspaper Home Delivery - Subscribe Today

[Home](#) • [News](#) • [Travel](#) • [Money](#) • [Sports](#) • [Life](#) • [Tech](#) • [Weather](#)

**About USA TODAY.com:** [Site Map](#) | [FAQ](#) | [Contact Us](#) | [Jobs with Us](#)  
[Terms of Service](#) | [Privacy Policy/Your California Privacy Right](#) | [Media Kit](#) | [Press Room](#)

**News Your Way:** [Mobile News](#) | [Email News](#) | [Add USA TODAY.com RSS feeds](#)

# **EXHIBIT I**

PRINCIPALITY OF MONACO

M.I.S

MONACO INTELLIGENCE SERVICE



Intelligence Service of His Serene Highness  
The Sovereign Prince of Monaco  
Prince Albert II



Report reference: 1206/1  
ISLAM & REGION

SECRET



MONACO

**Islamic identities & their activities  
surrounding the Principality of Monaco.**

**Report for H.S.H Prince Albert II  
December 2006**



MONACO

### Observation of report for H.S.H Prince Albert II

There are strong and very active Islamic cells surrounding the Principality of Monaco. A number of active extreme Islamic subjects work in the Principality. A few live in Monaco. This report covers activities from 1995 to 2006. There is a need to update the behaviour of some of these identities. We are working on it.

In 1996 agent Jean-Yves Gambarini, from the Monegasque Police department, advised banning the subject MEHDIOUI (PAGE 36) from the Monegasque territory to avoid a terrorist cell group developing in March 1996. There is today extremist, dangerous Islamic activities around the Principality that your Highness must be aware of.

A memo from September 2001 highlights the Monegasque Company (Société Anonyme Monegasque) JAMEEL<sup>S.A.M</sup>, founded in 1980, for having directly financed Muslim associations in the area, particularly the A.M.A.M association (Association Musulman des Alpes Maritimes) who reunite Islamic extremists. The financing of activities from this company spread not only to France but also to Liberia, North Africa & Saudi Arabia. (See file 18 at the end of this report PAGE 43)

Beausoleil has become an important centre for fundamentalist movements with violent preaching, and holds a Muslim community representing hard-core Islam. A memo from February 2006 identified fundamentalists living and working in Monaco (starting on PAGE 11). There are also "Tax" collectors for Islamic Associations who use force, violence, and psychological persuasions. See Achour AGGOUN (PAGE 20)

In France, Islamic ideas are carried through numerous associations descending from The TABLIGH, such as the association Dawa Tabligh, and the U.I.M (Union Islamique de Menton). The Dawa Tabligh is considered to be the most radical association in France. We have produced on page 3, a chart for a clearer overview of the associations and their link between identified subjects living around, and in the Principality.

Details concerning JAMEEL<sup>S.A.M</sup> can be found on page 43, details on Islamic Association on page 4, details on The TABLIGH on page 7. The rest of the report is a condensed briefing on identified individuals involved with alarming Islamic behaviour.



REPUBLIQUE  
MURITIA

**TABLIGH**  
This is a Sunnite fundamentalist movement.  
Origin Pakistan

**DAWA TABLIGH**  
The most radical association in France

SEMMANE (file 11)  
MIMOUNA (file 8)

Islamic Union of Menton  
PONZIANI (file 9)  
SGAIER (file 12)  
SHERIFF (file 13)

*Fast network chief  
fund collector of Les  
Alpes-Maritimes*

**TASSOUMT**  
(file 15)

*Head of the local  
fund collectors*

**GHENNAI**  
(file 3)

*Fund collector in  
Monaco*

**AGGOUN**  
(file 1)

**GRAMI**  
(file 4)

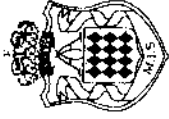
**TANNA**  
(file 14)

**Fouidil ZEGHDAR**  
(file 16)

*His name linked to  
this network*

**Azdine  
ZEGHDAR**  
(file )

**Farid  
ZEGHDAR**  
(file )



ISLAMIC REPUBLIC OF MAURITANIA

## ISLAMIST ASSOCIATIONS

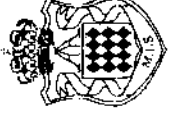
### I. CULTURAL UNION OF THE MESSAGE AND SALVATION

A. Memo from 16 June 2004: Opening of an Islamic book store in Beausoleil!

- ⇒ Located at 5, Avenue Francois Blanc in Beausoleil.
- ⇒ **Extremist educational guides** and religious or profane literature.
- ⇒ Opened by the president of UCMS of Cap d'Ail, Sauveur D'ALEO and managed by his wife Fatima DADI, Moroccan Citizen.
- ⇒ Sauveur D'ALEO: d.o.b 14 September 1963, Nice, France, French citizen, living at Villa Colibri, 3 Avenue Savorani in Cap D'Ail (also the headquarters for the association), employed as maintenance in the maritime industry.
- ⇒ Place of meeting for teenagers, close to 3 high schools and the oriental snack-bar "Chez Youyou"

B. Memo from 14 June 2004: Young Muslims from our area are taking courses to study the Koran in the south-west of France.

- ⇒ Nabil LACHELAK and Samir MALKI, linked to Monaco, are taking courses since several months in a Koran school in the Toutouse area.
- ⇒ LACHELACK: d.o.b 15 February 1976 born in Monaco, has Algerian citizenship, lives with his parents at 3110, Route de la Moyenne Comiche, unemployed. Worked in hotels: last job in August 2003.
- ⇒ MALKI: d.o.b 25 November 1981 in Nice, has French citizenship, lives with his parents at 116, boulevard de l'Ariane in Nice, unemployed. In 2001, was intern in the company BOSS from Monaco.



R E P O R T

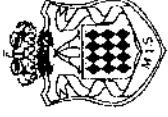
C. Memo from 16 February 2004: Fundamentalist identified in Monaco

- ⇒ During a demonstration against the law forbidding the Islamic veil in schools: a blue vehicle Renault plate N° T 798 (MC) was observed during this demonstration. (See page 12)
- ⇒ Owner of the car: Natale **TRABONA**, d.o.b 24 February 1952 in Vallelunga Pratameno (Italy), of Italian citizenship. Address: 28 Boulevard de Belgique in Monaco. Profession: painter for the company **SERBAT** at 10, Rue de Millo in Monaco.
- ⇒ Believed to have married in Morocco with a Muslim.
- ⇒ Believed to belong to **UCMS**.

D. Memo from 13 January 2004: Contacts between UCMS and Islamist movement in France.

- ⇒ Regular contacts between UCMS and Islamist bookstore **TAWHID**, 8 Rue Notre-Dame in Lyon, France.
- ⇒ This business is known as being the meeting place for fundamentalist Muslims and supply numerous written material and videocassettes on the study of Koran.
- ⇒ Abdou Salam **DIOP**, director of the regional media Islamic group **SALAM COMMUNICATION** situated at 13, Rue Amiral de Grasse in Nice and regroup publications as **REVEILLE-TOI MON FRERE** (Wake-up my brother), **LE MONDE ISLAMIQUE** (The Islamic World) and **ISLAM-INFO**; uses the members of UCMS to circulate them in the neighbourhoods.
- ⇒ Other propaganda audio-visual supports are provided by a fundamentalist named Belkacem **NEHAR** living at 5, Rue Frederic Cayrou in Castelsarrasin.





REPORT MEMO

## 2. THE MOROCCAN FRIENDSHIP ASSOCIATION

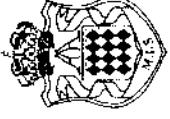
### A. Memo from 3 December 2003: Islam in Beausoleil.

- ⇒ **Beausoleil: Important centre of fundamentalist movements from Alpes-Maritimes.**
- ⇒ Claim a social and humanitarian action.
- ⇒ Good relations between the Beausoleil municipality and the Moroccan Friendship Association; political representatives see in these entities a way to easily stop the growing juvenile offenders in their communities. However, they seem to ignore the recent and discreet rapprochement of the juvenile offenders and the religious entities, which are facilitated by the exacerbation of the community spirit in the neighbouring country.
- ⇒ Last spring, creation of a new association: ASSOCIATION OF THE COMORIANS FROM BEAUSOLEIL; not many members and has a limited influence but **does not hesitate to influence the Pakistani's origin (which became in Europe one of the anterooms of violent Islamist activism) in the streets of Beausoleil.**
- ⇒ Prayer room SONOCOTRA of Beausoleil has become too small for the congregation; the preaching in this place is of a violent nature, one can only notice the radicalization of the Muslim community (40-50% are representative of a hardcore Islam).
- ⇒ A friendly relationship is existing between the president of the Moroccan Friendship Association, Mr Khairi BIRI and Mr Lucien PANIGHI, deputy to the city of Beausoleil sports activities, who is believed to have visited him in Morocco last summer by invitation.

MEHDIOUI (page 36) : Head (director) of prays in Cap d'Ail.

RACHID (page 42) : Autonomous element, undetermined mission.

BIA (page 31) : Liaison agent.



## The TABLIGH

Of Sunnite inspiration, this is a distinct movement within Islam that has experienced recent growth in France.

### Moderate Muslims openly label this movement as a sect.

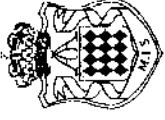
#### 1. A Distinct Movement within Islam

Recognized by **traditional Islam**, the Tabligh or Jama'at Al Tabligh **fundamentalist movement** began in India in the early 20th century but **without splitting the Muslim community**. However the more elite are leery of it because they generally **recruit among the social outcasts and the less educated**. Another characteristic is its high degree of conversion. The individual is encouraged to **strengthen his beliefs by convincing and thus 'converting' others**. Those whose integration into the French society has been a failure find themselves in a collective structure more adapted to their needs, but in a branch that excludes them even more from society.

The basics of the Tabligh are simple:

- to deliberately propagate and defend Islam.
- the diffusion of Islam is not reserved to the Uelmas (doctors of law, Muslim theologians).
- the behaviour of a Muslim must be guided by a literal interpretation of the Koran.
- to absolutely avoid being involved in politics.

The **Tabligh** has become a way to spread Islam and to **re-Islamize the Muslim community in France**. The first "conversionist" group is manifested in missionary travels throughout the country. Modelling themselves on the early groups of the Prophet's companions, these travels concretely display their religious fervour. The act of professing one's faith consists of making a trip to Pakistan, heartland of the movement, where followers receive training so they may ultimately also preach. As the organization is present



REPORT VLS

throughout the world, some missionary journeys are to foreign countries and thus establish contacts or allow exchanges. The Tabligh has recently expanded across France.

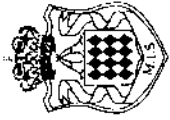
## 2. Recent Evolution in France

Having appeared in France in the 60s, the **Tabligh is organized into associations**. The Organizations of the movement share the following characteristic: while remaining centralized, the **Tabligh adapts to different local trends** and allows relative **autonomy in functioning**.

During the 80s, a split occurred creating two distinct poles in the Paris area: one in Clichy (Hauts-de-Seine), 64, rue Mme. de Sanzillon, the other in Saint-Denis (Seine-Saint-Denis), 52, avenue Paul Vaillant Couturier. The latter, encouraged by its growth in the early 80s, breathed new life into the group with militant activities (organizing manifestations and protests in France and pilgrimages to Pakistan). **Today we observe a multiplication of organizations affiliated with the Tabligh, movements and mosques have come under their umbrella**. This development appears to be taking place in a climate of anarchy, reinforced by the rivalries between Clichy and Saint-Denis, though they may not be obvious to the base.

Paradoxically, the Tabligh's rejection of public life accentuates the danger of radicalization for certain elements. The absence of perspective of a social project for the protest movement leaves a void for those who would like to see change. **The Tabligh prepares Muslims to be fundamentalists** by forcing them into strict religious habits that are obligatory for each believer. Certain among them then join radical movements that offer **larger political perspectives**.

The ever growing needs of the group bring up the question of their finances. The very character of the adepts has forced leaders to turn to **donators from the Gulf countries**. The French Tabligh has also used **funds from certain Muslim states** whom offer their support to **counter the influence of other Islamic groups**.



R. P. BERTALLES

Among these countries, Pakistan holds considerable prestige: the birthplace of the Tabligh in the world, its' influence is reinforced by the absence of elite nationals who might orient the movement locally and guide it in its' spiritual quest.

It has also been noticed that certain of these Muslims, besides being offered religious trips to Pakistan, have been offered, because of their motivation for the Jihad and their physical and psychological capacities, military training in camps, situated for the most part in Afghanistan or Pakistan in the border area.

In France; Islamic ideas are carried by numerous associations descending from the Tabligh, such as (Dawa Tabligh), and the "Union Islamique de Menton."

The movement is forbidden in Arab countries (Egypt, Tunisia), where it has encouraged fundamentalist revolts in the last decade.

Strongly represented in Algeria, where its representatives were either arrested, killed or forced into hiding. It was the foundation for the creation of the FIS (Front Islamique du Salut) and of the GIA's (Groupes Islamiques Armes) who were responsible for the wave of terrorism in Algeria and France.



ROYAUME DE MONACO

Sufi Hassan SHERIFF  
(file 1)

October 1995

Sufi Hassan SHERIFF, born 21 September 1953 in Colombo (Sri Lanka), holds Sri Lankan citizenship.

**Residing** Palais Miami, 10 boulevard d'Italie in **Monte-Carlo** (two rooms on the first floor up) he has a standard resident's card No. **016848**, issued on 1 December **1994** and valid until 18 February 1996.

He is a **janitor for Azur Tech**, 3 rue Plati, **Monaco** (info from September 2001) and previously worked for Partner's Service, at 37 avenue des Papalins, Monaco (info from October 1995).

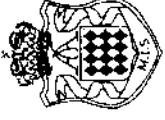
He was married on 17 August 1984 to Fathina Jainudeen, born 7 June 1960 in Colombo (Sri Lanka). He is father to 2 children: Mehdi born 18 February 1988 and Madam born 25 July 1994.

The couple has lived in **Monaco since February 1987**.

Having arrived in France in 1980, Sufi Hassan Sheriff has only had a valid visa since 1985, after obtaining **political refugee** status after considerable paperwork.

While he has never unfavourably drawn the attention of Public Safety, and enjoys a good reputation professionally, Sufi Hassan Sheriff, is a **devoted fundamentalist militant**, who is a **very active proselyte in Monaco** and neighbouring communities.

Since September 1989, he is the **treasurer (and founding member)** of the "**Union Islamique de Menton**" whose headquarters are at 85 avenue de Sospel, Menton (Alpes-Maritimes).



MONACO

Vinicio PONZIANI  
(file 2)

November 1995

Vinicio Ponziani (called "Small" in Muslim circles) was born 20 February 1922 in Bagnomeggio (Italy) and is an Italian national.

**Residing** 22 rue de Millo in Monaco since 1952 (he owns his apartment), he has a "privileged" resident visa no. 010642, issued 12 November 1992 and valid until 11 November 2002.

In fact, he spends most of his time in a villa, chemin du Serrier in La Turbie (Alpes-Maritimes).

Married to Paola Bracco since 1955, he is the father of two adult children who no longer live in the region.

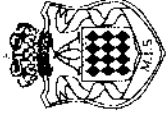
Having spent most of his professional career with Precis-Meca in Monaco, he retired in 1988.

At the time he was a skilled metal worker.

Having converted to Islam in 1986 he immediately embraced the fundamentalist cause and completed his pilgrimage to the Mecca in 1987 with Adnen SGHAIER who worked under him at Precis-Meca but who acted religiously as his confessor (see file 5 PAGE 16).

With Adnen SGHAIER, he helped to create, in 1989, the "Union Islamique de Menton" of which he is one of the principal financiers and is president. He is fairly well-situated financially.

Though he has no judicial history, he is very virulent on the religious scene and holds a high position within the fundamentalist hierarchy of the region.



R. FOURVILLIS

March 1997

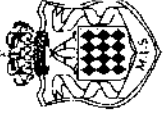
An Islamist from Monaco Involved in an Incident in Nice

Last week, two people in a white Citroen AX, license plate 8356 (MC), belonging to Vinicio PONZIANI, created an incident in Nice (06), boulevard Victor Hugo.

The two bearded individuals wearing djellabahs, like most Musliim fundamentalists, verbally attacked a passer-by who was observing them.

The altercation went no further because Mr. PONZIANI, calmed his young friend (un-identified).

Specialized French Services discovered that the two men had recently spent a good deal of time in the neighbourhood looking for a certain SALMA, unknown to our service, who was believed to live near where the incident took place at 134 boulevard Gambetta.



REPUBLIQUE DE MONACO

Rebalben Cherif GRAMI  
(file 3)

November 1995

Rebai Ben Cherif Grami was born 18 October 1950 in Sigus (Algeria) and is an Algerian national.

Residing at "Les Genets", chemin Remain in Cap d'Ail (Alpes-Maritimes), he is a **head waiter** at the **Balmoral** hotel in **Monte Carlo**.

Married to Habiba Messika on 20 November 1978 he is the father of 5 children who all live at the family home.

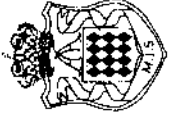
Having arrived in France in 1972, he was quickly **hired** by the **Balmoral hotel (Monaco)** and has never left them.

Not unfavourably known in the archives of the Surete Publique, he **joined** the ranks of **Muslim fundamentalists** at the end of **1980s**. Though he had adopted quite a European lifestyle, he began to **display terrible intolerance** and to perform the strictest **practice of his faith**, with a **completely obscurantist approach**.

As a **collector of funds for Islamic fundamentalists** in the same network as Achour AGGOUN (File 9 PAGE 20) and Mohamed TANNA (file 4 PAGE 15) he has **threatened people to obtain results**.

He is also one of the **most active members of the Union Islamique de Menton**.



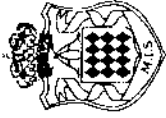


REPORTS

November 1994

An investigation of Achour Aggoun (file 1) and Rebai GRAMI (file 3 PAGE 13) brought to light information from a confidential source exposing AGGOUN (File 9 PAGE 20) as an **unconditional supporter** of the FIS who demands 2000 francs monthly from his fellow believers for the treasury of the FIS.

If someone refuses to pay the 2000 francs, AGGOUN, accompanied by GRAMI, pressures the reluctant Arabs to pay the "political tax".



R O U B I M I S

Mohamed TANNA  
(file 4)

November 1995

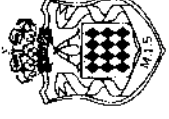
Mohamed Tanna was born in 1953 in Douar Tanchacht (Morocco) and is a Moroccan national.

Residing at 7 rue Pasteur in Beausoleil **profession busboy** with the **SBM** since **May 1982**, date at which he arrived in the region.

In 1977, he married Rahma Etrab.

Having **converted** to the ideas of **Islam** in recent years, he is more discreet in his behaviour than the other two members of his network, Rebat GRAMI (file 3 PAGE 13) and Achour AGGOUN (File 9 PAGE 20), with whom he regularly collects donations for the **fundamentalist cause**.

He is not unfavourably known from a judicial standpoint.



REPORT MONACO

**Adnen SGHAIER**  
(file 5)

November 1995

Adnen Sghaier, born 4 February 1952 in Ksibet El Medioumi (Tunisia), is a Tunisian national.

Residing "Le Dondera", 85 avenue de Sospel, Menton (Alpes-Maritimes), he is a technician with **Precis Meca 4/6**, avenue Prince Hereditaire Albert, **Monaco**.

In 1975 he married to Rouhia Maiek and is the father of 4 children.

He arrived in France in 1973 and **began to work in Monaco**, early 1975, at an entry level job in the same company that employs him today.

Afterwards, he climbed the ladder and is now part of the management in his workshop.

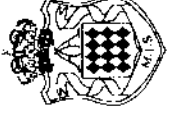
Generally well educated, he is a **devoted Islamic fundamentalist** (1985). He has already made several pilgrimages to Mecca (the first in July 1987).

On 12 December 1989, he was sentenced to a fine of 700 francs by the "Tribunal Correctionnel de Monaco" for an irregularity on a train.

This aside, he has no other judicial history.

He is one of the founders and the secretary of "Union Islamique de Menton"

His home is also the headquarters of the association.



REPORTS

Mohamed SEMMANE  
(file 6)

November 1995

Mohamed Semmane, born 5 September 1967 in Marseille (Bouches-du-Rhone), has dual Citizenship in France and Algeria. He is married with no children.

Residing 138, rue Felix Pyat, Marseille (3rd) he is a social worker at the community centre "Vivre sans frontiere", at 23 rue Caravelle in Marseille (3rd). He is also an **Islamic preacher and member of the association Dawa Tabligh** which is one of the **strictest Islamic movements**.

The subject, whose level of general culture is acceptable (holds BEP as a geometric operator) has never worked in his field. Since his military service 1987-1989 he has primarily been involved in "socio-cultural work".

In fact, he preaches in the poorest neighbourhoods and tries to convert young Arabs to the strictest form of Islam.

Not unfavourably known from a criminal point of view, he is a **very dangerous element ideologically**.

He is close to members of the "Union Islamique de Menton" and particularly close to Mr. Sufi Hassen Sheriff (see file 1 PAGE 10), residing in Monaco, whom he visits frequently.



REPORT

Mohamed KAABOUN  
(file 7)

November 1995

Mohamed Kaaboun was born 27 July 1967 in Temsamane (Morocco) and is a Moroccan national.

Residing 18, avenue Desambrois, Nice (Alpes-Maritimes), he is presently unemployed. In the past he was a waiter and later "maitre d'Hotel" with the hotel Le Siecle at 10 avenue Prince Pierre, Monaco from September 1990 to August 1995. Officially single, he lives with a French woman, with whom he had a child last month. (She has not yet been identified because of the precautions taken in conducting our investigation.)

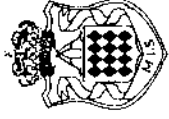
Raised mostly in Corsica, in the Bastia region, the subject is very European and does not practice his faith in an orthodox fashion. We have no judicial records on him. However, according to confirmed information, it appears that Mohamed Kaaboun is a militant of the Islamic cause.

In 1994 and 1995 he organized informal meetings with fellow believers, in the evenings, in the meeting rooms of the hotel Le Siecle (MONACO) where he was working.

Apparently private and banal, the meetings allowed the participants to discuss politics, and fundamentalist doctrine was frequently and vigorously defended.

Laid Hammoudi regularly came to the meetings while he was employed as a dishwasher in the same establishment (approx. until end 1994)

Kaaboun often received long phone calls in the evening at the hotel from "Maghrabin" contacts who appeared to be living abroad, particularly in Germany.



REPUBLIQUE TUNISIENNE

Laid ben Zouaoui HANUNOUDI  
(File 8)

November 1995

Laid Ben Zouaoui Hammoudi was born 10 January 1942 in Sigus (Algeria) and is an Algerian national.

Residing at the Sonocotra boarding house in the "lieu-dit" Usine a Savon in Beausoleil (Alpes-Maritimes) he is presently unemployed.

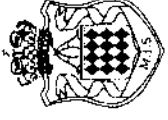
When working, he was a dishwasher or busboy in the hotel/restaurant business (SMB, Le Siecle hotel, **Rampoldi** restaurant) or a construction worker (Richeimi, Samexport). He often works for temp agencies in the **Principality (BIS, M.I.)** and he is even thought to have worked illegally, but it could not be proven.

Married since 1967 to Djemaa Mammoudi, the couple has 6 children. They all live in Sigus.

He is not unfavorably known on a judicial level. He is a **frustrated character** - barely literate - and a **fierce fundamentalist** who **only speaks with his fellow believers in Arabic**, whether they like it or not, even though he speaks decent French.

He is always trying to convince non-believers to join the fundamentalist cause.

A member of the Union Islamique de Menton, he is a friend of Mohamed KAABOUN (file 7 PAGE 18) and has ties to Achour AGGOUN (file 9 PAGE 20), Mouloud GHENAI (file 16 PAGE 41), Rebai Ben Cherif GRAMI (file 3 PAGE 13), Foudil ZEGHDAR (file 12 PAGE 25-30) and the his two sons Azdine and Farid ZEGHDAR. (See file 12 PAGE 25-30) (**dangerous family**)



REPUBLIQUE

Achour AGGOUN  
(File 9)

Report:  
November 1994 / April 1996 / September 2001  
-----

Achour Aggoun was born 3 October 1944 in Sigins (Algeria) and is an Algerian national.

In April 1996 he was living at the Sonacotra boarding house "Les Cistes", avenue Costa Piano in Cap d'Ail (Alpes-Maritimes), and working as a cleaning technician for the "Societe Monagasque d'Assainissement" (purification) at 3 avenue de Fontvieille in Monaco.

In September 2001 he was still working with the SMA but his residence was at 29 avenue de Villaine in Beausoleil.

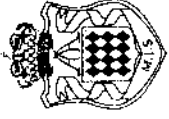
Married to Zina Aggoun since 3 October 1967, he is the father of 8 children. His wife and the children still live in Sigus.

Having arrived in France in 1970, he moved to the region and has worked in the Principality since 1973.

He held various lower-level jobs in the hotel business (dish-washer, bus boy at the Metropole hotel, the SBM, at Loew's or at the Rampoldi restaurant) and in construction (labourer for the SMETRA or for the temp - agency M.I).

Since May 1990 he is a cleaner for the SMA.

A former alcoholic, in recent years he has adopted Islamic fundamentalist ideas.



REPORTS

Now a fervent believer, he wears a beard and in May 1995 he went on a pilgrimage to Mecca.

Known for proselytizing in France, where he lives, and in the Principality where he works, he also collects donations for the fundamentalist movement from his fellow believers.

A member of the Union Islamique de Menton and somewhat excessive, he has been known to exert psychological, and sometimes physical, pressure on those who are slow in responding to his demands.

He continues his radical behaviour with the support of Rebai GRAMI (file 3 PAGE 13) and Mohamed TANNA (File 4 PAGE 15) who are members of the same network.

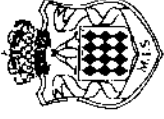
He is not unfavourably known from a judicial standpoint.

3 November 1994

An investigation of Achour Aggoun and Rebai Grami brought to light information from a confidential source exposing Aggoun as an unconditional supporter of the FIS who demands 2000 francs monthly from his fellow believers for the treasury of the FIS.

If someone refuses to pay the 2000 francs, AGGOUN (file 9 PAGE 20), accompanied by GRAMI (file 3 PAGE 13), pressures the reluctant Arabs to pay the "political tax".





R. P. O. C. M. I. S.

### Anis MOUMEN and Yamim AFOUF

(file 11)

Identification of two Islamists who periodically visit the Principality of Monaco.

October 2001

We have just formally identified two Islamic militants from the Tabligh movement who periodically visit the Principality of Monaco for professional reasons.

Anis Moumen was born 26 August 1976 in Bizerte (Tunisia) and is a French national. Residing 151, route de Turin in Nice (06). He has a BTS in Sales and is presently seeking employment.

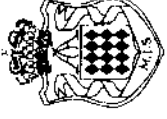
From June 1999 to June 2000 he worked for the temp agency Vediorbis in Monaco, at 19 rue Grimaldi as a stockroom worker.

Yamin Afouf was born 17 March 1970 in Nice (06) and is a French national. Residing 5 rue Maurice Maccario or 30 avenue General Saramito, Nice (06). He is a carpenter and woodworker.

Sometimes working for temp agencies in Nice and the region, he is presently looking for a job in the Principality. (He recently went to Manpower Monaco, 9 rue Princesse Florestine).

While not unfavourably known in our documentation, these two individuals both belong to the Tabligh movement, one of the most radical of Islam (even moderate Muslims openly label this movement as a sect), and must be considered as potentially dangerous.

Indeed, Anis Moumen and Yamim Afouf are known to our French counterparts at the DST as being very active elements, not only in a religious context.



REPORTS

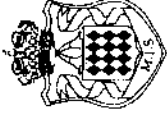
Yamin Afouf, underwent training in Pakistan in the 90s and was seen in Albania in 1998 by the DGSE when he attempted to cross this country to join the Muslim fighters of the PUCK in Kosovo.

Anis Moumen also comes from a Tabligh family (his father Mohammed is also under surveillance by the DST) and within his organization he has carried out a considerable work of propaganda over the last months in the Var department.

He was also known to the French police in the 90s for different crimes (theft, brutality).

Moreover, according to information from a well-informed source, the two subjects appear to be in contact with persons having ties in the Principality MONACO and known to our service with members or even leaders of the Tabligh movement for several years.

They are: Vinicio PONZIANI (file 2 PAGE 11) or Ismail, Azdine BIA (file 13 PAGE 31) and Sufi Hassan SHERIFF. (File 1 PAGE 10)



REPUBLIQUE

**Azdine ZEGHDAR**  
(file 12a)

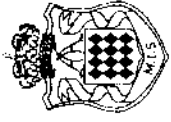
November 1995

Azdine Zeghdar was born 16 March 1967 in Monaco and has Algerian nationality. Residing 36 boulevard de la Republique in Beausoleil (Alpes-Maritimes). He is presently awaiting the verdict of a French deportation committee following his sentencing to 5 years in prison for narcotics and violations. He no longer has the right to work in France.

His father is Foudil and one of his brothers is Farid.

He is very unfavourably known to the Surete Publique and is presently banned from Monaco.

He and his brother are locally respected by juvenile youth. The majority of their revenue still comes from prostitution and drug trafficking.



REPUBLIQUE TUNISIENNE

**Foudil ZEGHDAR**  
(file 12b)

November 1995

Foudil Zeghdar was born in 1936 in Sigus (Algeria) and is an Algerian national.

Residing at 6 (or 36), boulevard de la Republique in Beausoleil (Alpes-Maritimes), his profession dishwasher with the **SBM** since 1963.

He knows Mohamed TANNA (file 14).

Having lived in the region since 1958, he was married twice and has 8 children from the two unions.

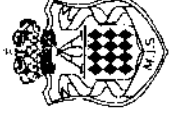
A hard-worker but with a violent nature (in 1983 he hurt his rival in a fight of a passionate nature), he also shows little respect for authority. (He has been insolent to agents of the Surete Publique on several occasions.)

Age has probably played its part, but his aggressive nature seems to have calmed somewhat. He makes no attempt to hide his **pro-Islamic convictions**, and **during the Gulf War, he even displayed a portrait of Saddam Hussein on the windshield of his car.**

Two of his children, Azdine and Farid are criminals who are well known to the Surete Publique. They have both been forbidden to enter Monaco and are respected as local kingpins by the juvenile delinquent crowd. The majority of their revenue continues to be generated by prostitution and drug trafficking. A portion of these benefits of suspicious origins is given to the ZEGHDAR family to the representatives of the Islamic cause.

September 2001

He has not shown any employment since 1996 and is possibly retired.



R E P O R T I V E S

**Karim ZEGHDAR**  
(file 12c)

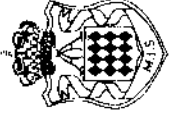
September 2001

Karim Zeghdar was born 19 August 1974 in Monaco to Saadoum and Marie Therese Thomassian. He is a French national. He lives at 13 avenue Paul Doumer in Beausoleil.

This individual is very unfavourably known in our archives, not for any fundamentalist sympathies but for his work at Monacair (ground operator), a job he obtained through his brother, Salim (file 16b), who is an executive with the company and honourably known.

Beginning in 1993 his police record includes:

- Breaking and entering
- Narcotics violations
- Theft
- Vandalism
- Criminal threats (drug related)
- Bad checks
- Involved in the "Affaire Pilloi Patrizia" and cited in the investigation of the death of the young Audrey Depoulain.



MONACO

Farid ZEGHDAR  
(file 12d)

September 2001

Farid Zeghdar was born 9 December 1974 in Monaco. He is the son of Foudil Zeghdar (file 16a). He holds both French and Algerian nationality. He lives at 3B avenue de Villaine in Beausoleil.

He works as a security agent for Monte-Carlo Protection and is very unfavourably known in our Service. For the moment he has shown no signs of fundamentalist sympathies but is listed because of his father (Foudil, file 16a) and of the nature of his employment in Monaco.

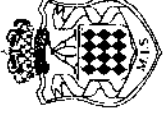
He and his brother are very unfavourably known to the Surete Publique. In November 1995 they were both banned from Monaco. He and his brother are locally respected by juvenile youth. The majority of their revenue still comes from prostitution and drug trafficking.

His police record is as follows:

- 17 July 1995 : Banned from Monaco
- 23 September 1999 : Ban suspended for one year
- 17 October 2000 : Suspension of ban renewed through September 26, 2001.

September 28/ 1994

The subject was taken in for questioning by the police of Beausoleil for breaking and entering and attempted robbery of the "Salle des Fetes". He claimed to be part of a group of 10 in the company of Yacme SEBIA and Azzine ZEGHDAR (file 12a-PAGE 25).



RECORDS

July 25/ 1995

**Sentenced to one month imprisonment (by instalment) for writing invalid cheques to Carrefour and McDonald's in Monaco.**

May 05/ 1993

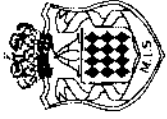
**Sentenced to 3 months imprisonment (suspended sentence) in Monaco for assault & battery.**

27 April 1994

**He had his driver's license revoked for 3 years.**

March/ 08 1994

**Sentenced by the courts in Monaco to a 3000 franc fine for involuntary injury and refusing the right-of-way to a pedestrian**



REPERAIRES

Salim ZEGHDAR  
(file 12e)

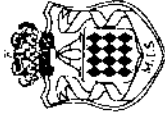
September 2001

Salim Zeghdar was born 8 August 1970 in Monaco to Saadoum and Marie Therese Thomassian. He is a French national and has no police record.

He is married and the father of one child. Their address is route de la Plage Marquet, L'Athalante, Bloc C, Cap d'Ail.

His brother, Karim (file 12c-PAGE 27), is very unfavourably known to the police.





REPORT N° 13

**Azedine BIA**  
(File 13)

Reports :  
October 1995 / September 2001

Azedine Bia was born 1 March 1963 in Douar El Oued (Morocco) and is a Moroccan national.

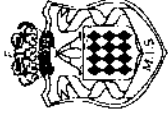
He held no job in Monaco from 1998 to 2001 but was previously employed by "Boucherie Nigioni" in Moneghetti and before that was with the agency Ecco Monaco beginning 29 September 1995.

In 2001 he lived at "Les Romarins", 30 avenue General Saramito in Nice. In 1995 he lived at 61 bis, promenade Robert Schumann in Roquebrune-Cap-Martin (Alpes-Maritimes).

On 15 September 1991, in Meknes (Morocco), he married Hafida Daharguibi, born 8 September 1962 in Kumiya (Morocco), a Moroccan national. He stayed at home in 1995, raising their child Wissam, born 28 March 1995.

Having arrived in France in 1988, he first attended the Liberal Arts University in Nice, studying sociology for 3 years. Strangely in January 1989, he began taking on lower-level employment in the Principality:

- ⇒ Janitor with Sterna,
- ⇒ Kitchen assistant at the restaurant "Le Fuji"
- ⇒ Cleaning agent with Partner's Service
- ⇒ Stock room worker for Marie CERESA at the Marche de la Condamine

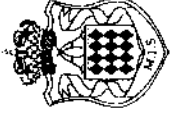


REPERCUSSIONS

Recognized as intelligent and having a high level of studies, he has lived and continues to live a very modest life. He is not known unfavourably by the justice.

He embraced the Islamic cause around 1992 and proudly wears a full beard. Relatively discreet about his private occupations we learned that he often travels to the Stephanois region or the suburbs of Lyon. He is the subject of discreet surveillance by the French police.

However, in Monaco, our surveillance has not brought to light any contacts in the Islamic world.



R. P. O. R. T. N. O.

**Mohamed TASSOUMT**  
(file 14)

November 1995 / June 1998 / September 2001

Mohamed Tassoumt was born 2 August 1958 in Casablanca (Morocco) and is a Moroccan national. His parents are Laheen (or Lahcen) and Rakia Bent Mohamed.

His father retired from domestic service with Maitre Michel Boeri, a "Conseiller National". He has 5 brothers: Said, born 1962, Boudgenta, born 1965, Aberhaim, born 1969, Mustapha, born 1971 and Rachid, born 1977. They all live in Monaco except Boudgema who lives in Menton.

He was raised by his parents in Casablanca where he lived until the end of 1973. He did all his studies there.

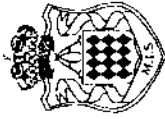
In early 1974 he moved with his family to Monaco where he lived until 1989, date of his departure for Beausoleil. He had a resident visa which he returned upon leaving.

He had the following professional experiences:

- 1974-1977: mechanics aid at the "Garage du Font"
- 1977-1979: same profession with the garage "Del Bellino"
- 1979-1982: waiter at the SBM ("Hotel de Pans et Hermitage")
- 1982-1985: waiter at the hotel "Splendid"
- 1985-1997: owned with other members of his family the "Boucherie Orientale de Beausoleil"

Since 14 March 1998 he has worked as a waiter in the restaurant "Le Touareg" rue de la Turbie in Monaco.

He moved back to Monaco with his wife and his son. They live in a four-room apartment, lodgings provided by Mrs. Faggionato, owner of the Touareg.



REFUGEE APPEALS

He is the subject of no unfavourable remarks in our archives.

He is not on the list of wanted individuals.

He applied for a "vierge" French police record on 23 June 1998.

As a Moroccan, a non-EU national, and having lived in France for more than one year, he filed a request to live in Monaco with the French Consulate there, as outlined by recent legislation. This consulate wrote to the Department of the Interior on 19 May 1998 making no objection to his being issued a visa.

He was informed that he must return his French visa to the French authorities immediately upon receiving his visa from Monaco.

July 1999  
Renewal of TE.

No change in situation, including his housing for which the CTH had issued a favourable review on 12 August 1998.

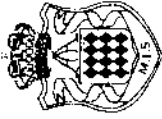
No information from our archives or the FPR.

LIP Nathalie Mathis, 26 June 2000.

Renewal of CS as a Temporary 3. No change in situation.

Renewal and transition to ordinary.

No change in situation, including his housing (favourable review from CTH on 12 August 1998). Impeccable SMEG.



REPUBLIQUE

His son, Mehdi, who was born in 1983, is enrolled at the school Saint Joseph in Roquebrune Cap-Martin.

Nothing of interest in our archives, unknown to the FPR.

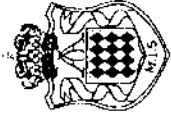
November 1995

Manager of me SARL ABM (butcher shop, grocery store) at 16 rue Longue in Menton (Alpes-Maritimes) since 1994, he is also responsible for another store of this type in the village of Beausoleil.

Not unfavourably known to the Surete Publique nor to the French police, the subject, hard-working and intelligent, appears to be perfectly integrated into Western society and its ways. For example, he encourages the use of the nickname "Momo" or even Maurice.

However he centralizes the funds collected by Adnoun AGGOUN (File 9 PAGE 20), Mohamed TANNA (file 4 PAGE 15), Rabai GRAMI (file 3 PAGE 13) and Mouloud GHENNAI (file 16 PAGE 41 ) for the Islamic cause. He is also a close friend of Mohamed KAABOUN and a member of the Union Islamique in Menton.

His brother Said also runs a butcher-grocer on rue Emile de Loth in Monaco-Ville.



REPORTS

**Nouredine MEHDIQUI**  
(file 15)

Nouredine Mehdioui was born 27 April 1958 in El Khroub (Algeria) and is a French citizen (naturalized on 2 February 1996). His parents are Mohamed Tayeb and Aicha Bechekri, both Algerians.

The subject was raised by his parents in Algeria. His father was a mason. He has seven brothers and one sister.

He studied in El Khroub until 1974 when he became an athletic director in his hometown through 1982.

He arrived in France from Algeria in 1982 and lived in Perigueux.

There he was an "extruder" with Multi Plastic from 1982 -1983. Then he worked at the city slaughterhouse from 1983 to 1986.

At Chamiers (Dordogne) on 16 October 1982, he married Jocelyne Lemoing (widow of Mohamed Ferdri), born 22 August 1951 in Amboise (Indre et Loire).

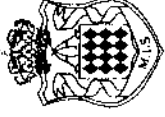
They have three children:

- Fatteh, Sofiane, born 22 May 1984 in Perigueux (Dordogne)
- Saif-Eddine, Mehdi, born 11 March 1989 in Monaco.
- Sapia, born 28 November 1995 in Monaco.

The family lives in a three room apartment at l'Observatoire Palace, 63 boulevard du Jardin Exotique in Monaco where Mrs. Mehdioui has been concierge for the building since April 1987.

His family moved to the Principality in March 1987. He has a "regular residents card" :No. 012047 valid through 2 July 1999 and has held various jobs:

- March-May 1987, night desk duty for Hotel Miramar
- May 87-May 88, driver-deliverer-stock assistant for Habib Benyoussef, "Societe Agro Alimentaire de Monaco", 6 rue Langle.



REPORT FILE

- May 1988 - June 1990, security agent for Monte Carlo Protection, 31 avenue Princesse Grace. (He lost this job because of **excessive drinking**)
- 1990 or 1992, specialized maintenance agent for "Centre Hospitalier Princesse Grace" (present employment as of April 1999)

In 1994 he owned a red Ford, license plate T 420 (MC).

To our knowledge he and his wife have never been found guilty in any judicial proceedings.

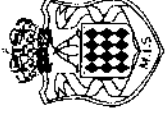
However, they became very well known in the mid 90s for their **fervent adherence to the Muslim fundamentalist movement.**

29 June 1994 **two fundamentalist Muslims were interpolated** boulevard Rainier III in Monaco. They were Nezar TORCHE and Nourredine KHODJA. In their **possession** were **four books on the Koran** from their personal library, not Islamic propaganda. Neither of them is unfavourably known to our knowledge. They were on their way to visit Mr. Nourredine **MEHDIQUI**. A former alcoholic, MEHDIQUI gave up alcohol and **turned to hard-core Islam**. He began to dress like a fundamentalist and the furnishings of his apartment began to reflect this choice:

- photos of Mecca
- books on the Koran
- prayer mats.

Within months the **apartment** was being used as a **Muslim meeting place and prayer room.**

By October 1994 he had also **convinced his wife**, born Christian, to **convert**. She began to dress in accordance with the **most rigid precepts of Islam** (arms and legs always completely covered no matter the season), and systematically wearing a "tchador" and **practicing her new religion with excessive rigor**. In private her stance is also said to be very strict. However, according to our investigation, she performs the duties of her job very satisfactorily and is held in esteem by practically all of me renters and owners of her building.



REPORTS

In this same period of time, it was noted that the subject hosted visitors from the Omar KHATAB mosque in Bron, **known for their extremist tendencies: Mohammed ZEROUALE and Abderrahim Hour.**

By October 1995, MEHDIOUI was proselytizing and was more and more intolerant to non-practicing Muslims. He began to develop **relationships with fundamentalists** in the Alpes- Maritimes. He made regular visits to the Sonacotra boarding house, RN 202, Nice- Saint- Isidore in Drap, a favourite hang out of Islamists. He was also seen with others Islamists in the Pasteur neighbourhood of Nice. Among his relations at this time we find Hamadi RACHID (see chart TABLIGH).

23 January 1996 a warrant was issued for Slimane **BOUDRAA** and El Hadj **IVIABREK** for criminal association and terrorist enterprise. It led to the 26 March 1996 operation carried out by the police and the interpolation of the following suspects, for the most part having ties to the "Centre Islamiste des Alpes Maritimes" (CLAM) on rue Pastorelli in Nice : Sufian **YASSEN**, Karim **FEKRANE**, Mohamed **SEMMACHE**, Azzedine **ZEUDMI-SAHRAOUI**, Henni **KAIBOU**, Mohamed **TOUIL**, Mohamed **TOUZANI**, Nezar **TORCHE** and **Nourredine MEHDIOUI**.

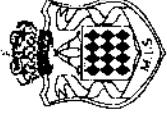
These subjects were **not directly implicated** in any terrorist attacks **but were considered as relays for Islamic propaganda and as logistical transfer points for armed groups.** Certain are in contact with individuals in Italy and with Bosnian Muslims.

**MEHDIOUI**, who presented himself to the police spontaneously in the context of the investigation of the Centre, was found to have **relations with:**

- El Hadj **MABREK**. Served as the contact for an armed terrorist group, the GIA.
- Azzedine **ZEUDMI-SAHRAOUI**, at whose home were found Tunisian stamps and a code grill.

**MEHDIOUI** also appeared to have ties to Muslims in the Lille area where he was visiting the previous week (mid-March 1996). The investigation turned up ticket stubs for a trip to Lille and the surrounding area and the coordinates of Rabah **LAOUFI**, a Lille resident.





CLERMONT

Omar ZEMMIRI, interpolated in Belgium for his Islamic activities and for having fled following the tragic events in Roubaix - RAID attack - was found in possession of MEHDIOU'S coordinates.

MEHDIOU does not appear to be a member of an armed group yet he is anchored in the Islamic movement. He regularly attends prayers in an AFNA room avenue des Anciens Combattants in Beausoleil, in a boarding house for immigrant workers. He sometimes says the prayers, thanks to his being a "Hhaj", acquired after having made two trips to Mecca. He does the same for another boarding house in Cap d'Ail.

He attempts to convert his young colleagues at work and often rebukes them for behaviour unworthy of young Muslims.

He owns an apartment in Drap that he uses as a Muslim meeting place and prayer room.

During our investigation, numerous video, audio and written documents relating to Islam were discovered. Also found were pro-Palestinian writings close to the Turkish Islamic groups.

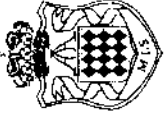
He was released after being questioned and his home in Monaco was not searched. MEHDIOU is the very prototype of the Islamic militant susceptible to house dubious individuals and to lend logistical support to Islamic groups.

Taking the facts into account, the Commissaire Stagiaire Jean-Yves Gambarini advised banning MEHDIOU from Monaco to avoid a terrorist cell group developing there in March 1996.

(Note: though it states his home was not searched, evidence resulting from a search was discussed in two texts relating his "garde a vue". Though not clearly stated, perhaps it was his apartment in Drap which was searched.)

April 1999

After this investigation the MEHDIOU couple became much more discreet. He cut his beard short and no longer displayed obvious signs of a fundamentalist (head cover, chaplet). It would seem that he also ceased any overt local proselytizing/converting. He no longer berated the non-practicing youth at his work place. He has also become an ardent



REPORTS

member of a labour union (USM affiliation) and was a highly satisfactory employee. Furthermore it would appear that the visits of his fellow believers and the prayer meetings in his home are fewer and farther between.

However, contacts in the Muslim world and the specialized French services have advised us not to accept this virtually "ideal" behaviour on face value. **The subject remains an active fundamentalist element in France.**

Indeed, since the latest wave of terrorism (comments from 1999) and the arrests and disbanding of Muslim groups that followed, **Islamic leaders advised the greatest discretion in behaviour and attitude for their militants.**

The militants continue, however, more discreetly but just as efficiently. The infiltration of official organizations such as labour unions, political parties and sports associations appeared to have also been recommended.

Thus Mr. **MEHDIOU** may simply be following these guidelines to the letter. He also changed his place of worship and faithfully attends the prayer room at 14, rue Miollis in Nice (06), **where numerous fundamentalists attend**, certain of whom are **considered dangerous** by the French police for having been involved in the past in the logistics of a **terrorist network**.

Despite his attitude in the Principality, we express deep reserves as to the behaviour of Nouridine **MEHDIOU** who **remains a very active element of the hard-line Islamic movement.**



REPORTS

**Mouloud GHENNAI**  
(File 16)

Report:  
November 1995

Mouloud Ghennai was born in 1925 in Ouled-Kaled (the Sigus region of Algeria) and is an Algerian national.

**Residing** 21 boulevard de la Republique in Beausoleil (Alpes-Maritimes) he runs a clothing store (Angel's).

Having **arrived** in France in 1952, he held several jobs (factory worker, driver-deliverer) in Monaco until 1958 when he opened a small hoisiers shop in Beausoleil.

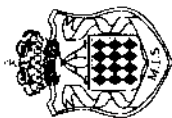
That same year he married Marguerite Marrari, a French national.

The couple has one child, Jacques, who was sentenced to 10 months imprisonment on 7 December 1987 by the Court of Appeals of the Principality of Monaco, as well as a 30,000 franc fine and being banned from Monaco for 10 years, for breaking the law regarding narcotics.

Mouloud Ghennai was fined for writing false cheques by the Correctional Courts of Nice in 1957.

Known in the past as an active member of the Algerian FLN in France, the subject has become an essential link in the chain of Islamic fundamentalists in the Alpes-Maritimes.

He has renewed one of the activities he performed for the FLN: collecting donations. These are gathered by Rebal ben Cherif GRAMI (file 3 PAGE 13), Achour AGGOUN (file 9 PAGE 20) and Mohamed TANNA (file 14 PAGE 15).



REPORTS

Hamadi RACHID  
(file 17)

November 1995

Hamadi Rachid was born 1 January 1957 in Soussse (Tunisia) and is a Tunisian national.

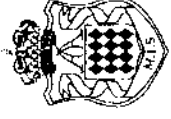
Residing 3 rue du Marche in Beausoleil (Alpes-Maritimes) he is a **technical agent** with "Atoms Monaco", 19 bis, avenue Crovetto Freres, Monaco. Serious about his work, he joined the company in 1978 when it was known as M.I.C.R.O.

He sometimes does maintenance work for the company Top Nett in addition to his principal employment.

Married to Trinidad Sendra-Gomez since 24 November 1979, they have three children: Sabri, Soufian and Sonia.

Typically discreet, he is not unfavourably known in the archives of the Surete Publique.

However, our **surveillance established** that the subject is a **close friend of Nouredine MEDHIOUI (file 15 PAGE 36)** whom he visits regularly. The two were also seen driving in the subject's Mazda 323, license plate 2935 WM 06 (title held by the French company C.O.G.E.N.I.E.C.).

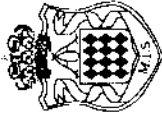


REPUBLIQUE

**JAMEEL S.A.M**  
**Société Anonyme Monégasque**  
(file 18)

**1. Memo from 18 September 2001**

- Founded in 1980 by Youssef Abdulatif JAMEEL, DPOB: 10 January 1943, Djeddah, Saudi Arabia. Director until mid-nineties; replaced by his brother Mohamed JAMEEL, DPOB: 13 February 1956, Djeddah, Saudi Arabia;
- Managing director is Mohamed Samir HAMADEH, DPOB: 8 March 1946, Jaffa, Israel, British citizen from Palestinian origin, residence permit Nr 020039 valid until 1 march 2004.
- Head office: 74, Boulevard d'Italie in Monte-Carlo.
- Since 1990, SAM JAMEEL was financing discretely several Muslim associations in the area and in particular: Association of the Muslims from Alpes Maritimes (AMAM) which reunite all local Muslim groups including extremists.
- In June 1991, Youssef JAMEEL signed a check for 1 million USD to a lawyer from Saint Ouen (Seine St Denis), Ahmed SIMOZRAG, who was at the time known to be a member of the Algerian Islamic Front for Salvation (FIS). In January 1992, it was exposed in the press.
- Youssef JAMEEL also financed the Islamic movement of the Tunisian opposition "EN NAHDA".
- In January 1994, Ahmed ZIMOZRAG who was the director of the Islamic Centre ABAAD in Saint-Ouen, was under house arrest by the French authorities during an anti-terrorist operation.
- Several members of the JAMEEL family owned several bank accounts at the CFM.



STATE OF PALESTINE

- After this date (1992), the financing of Islamists organizations in France and in North Africa by SAM JAMEEL continued but more discretely. A branch was created for this purpose and named JAYMONT INVESTMENTS LTD, 80 Broad Street in Monrovia, Liberia. This Liberian company could still own the account Nr 221 100 78162 E opened in 1993 at Credit Foncier of Monaco. The mail from this account went to Igbal BANGEE, P/O Box 7012, JAMEEL INTERNATIONAL Office in Djeddah (212 462 Saudi Arabia).

- The SAM JAMEEL could transit via its accounts Saudi government funds destined to Islamist propaganda.

2. Memo from 11 June 1991

- SAM JAMEEL is trying to finance the Muslim Association from Alpes Maritimes to build an Islamic School in Nice or Eze. SAM JAMEEL address is: "Le Millefiori", 1 rue des Genets in Monte Carlo. Youssef Jameel's addresses: P/O Box 248 in Djeddah, Saudi Arabia and 58, Avenue D'léna in Paris (16Erne).

3. Memo not dated

- Since February 1993, the director of SAM JAMEEL is Mohammad GUIDFAR, DPOB: 16 September 1960 in Tehran, Iran; Iranian nationality, resident in Monaco since 1989 and live at 33, rue du Portier in Monaco.

PRESENT DAY- DECEMBER 2006. JAMEEL SAM IS STILL ACTIVE.

# **EXHIBIT J**

**ROBERT ERINGER**  
78 MARYLEBONE HIGH STREET, STE. 747  
LONDON W1U 5AP  
ENGLAND

17 December 2007

H.S.H. Prince Albert II  
Palais de Mo  
MC 98000 Monaco

INVOICE

For Special Services,

January – March 2008

40,000 Euros

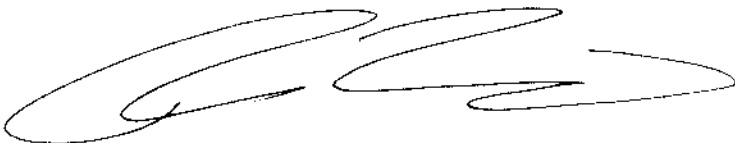
Please wire to:

Mr. Robert Henry Eringer

[REDACTED]

[REDACTED]

Attn. Urs Minder



ROBERT ERINGER



**ROBERT ERINGER**  
78 Marylebone High Street, Ste. 1-300  
London W1U 5AP  
England

28 January 2008

H.S.H. Prince Albert of Monaco  
Fax # + 377 92.16.02.22

Dear Prince Albert,

My last instruction from you was to remain on retainer and keep the doors open, and to bill you the newly agreed amount.

I have done this, and I have left a couple dozen messages on your phones in an attempt to bring you up to date.

Mike Powers mentioned that you asked about me recently and suggested you wanted to see me. I am, of course, available to meet with you any time. So when I heard this from Mike I phoned your mobile phone and left another message to that effect. Please let me know if and when you would like to meet by calling my USA mobile: 202.361.8069.

Meanwhile, Claude Palmero has still not paid my invoice for this quarter, which follows.

Respectfully,

A handwritten signature in black ink, appearing to be 'R. Eringer', with a large, sweeping initial 'R'.

ROBERT ERINGER

**ROBERT ERINGER**  
78 MARYLEBONE HIGH STREET, STE. 747  
LONDON W1U 5AP  
ENGLAND

28 January 2008

H.S.H. Prince Albert II  
Palais de Monaco  
MC 98000 Monaco

INVOICE

For Special Services,

January – March 2008

40,000 Euros

Please wire to:

Mr. Robert Henry Eringer

[REDACTED]  
[REDACTED]

Attn. Urs Minder



ROBERT ERINGER

**ROBERT ERINGER**  
78 MARYLEBONE HIGH STREET, STE. 747  
LONDON W1U 5AP  
ENGLAND

11 February 2008

H.S.H. Prince Albert II  
Palais de Monaco  
MC 98000 Monaco

OVERDUE

INVOICE

For Special Services,

January – March 2008

40,000 Euros

Please wire to:

Mr. Robert Henry Eringer

[REDACTED]

Attn. Urs Minder



ROBERT ERINGER

**ROBERT ERINGER**  
78 MARYLEBONE HIGH STREET, STE. 747  
LONDON W1U 5AP  
ENGLAND

3 March 2008

H.S.H. Prince Albert II  
Palais de Monaco  
MC 98000 Monaco

INVOICE

For Special Services,

January – March 2008

40,000 Euros

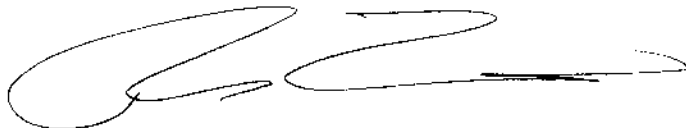
Please wire to:

Mr. Robert Henry Eringer



UBS (Monaco) S.A.

Attn. Urs Minder



ROBERT ERINGER

## ROBERT ERINGER

25 March 2008

H.S.H. PRINCE ALBERT II  
FAX # 377 92.16.02.22

Dear Prince Albert,

I hope you are well and that you enjoyed your 50th birthday celebration.

I have tried to phone you many times, have left messages, and sent faxes. When I phoned you on December 16<sup>th</sup>, you said you were on another call, and asked, "Can I call you back?"

The last time we had any meaningful conversation was on August 2<sup>nd</sup>. You requested that I continue to operate in your service to "keep the doors open" with other intelligence services, with an agreed lower fee of 40,000 euros per quarter.

I invoiced the first quarter of 2008 as normal, as per our agreement. We are near the end of this quarter and, despite several reminders to Claude Palmero and to you, this invoice remains unpaid.

If you wish to discontinue my service, please *tell* me, so I may plan accordingly. As it stands, all I have is my last instruction from you to "keep things going" for the payment you agreed. I have done this for the past three months. So, however you decide to proceed from this point forward, I would be grateful that my invoice for the quarter ending March 31<sup>st</sup> be paid. (Copy follows.)

If I hear nothing from you in response to this fax, I shall assume you wish for me to continue as normal, as that was my last instruction, and I will invoice presently for a new quarter beginning April 1<sup>st</sup>.

There are several ways to contact me:

Telephone: + 1 202 361-8069  
Fax: + 44 207 935-4141  
E-mail: eringer33@aol.com

Respectfully,



ROBERT ERINGER

# **EXHIBIT K**

# WINSTON & STRAWN LLP

36 WEST WACKER DRIVE  
CHICAGO, ILLINOIS 60601-9708

43 RUE DU RHONE  
1204 GENEVA, SWITZERLAND

98 GRESHAM STREET  
LONDON EC2V 7NG

GORDON A. COFFEE  
(202) 292-5741  
gcofee@winston.com

1700 K STREET, N.W.  
WASHINGTON, D.C. 20006-3817

(202) 292-5000

FACSIMILE (202) 292-5100

www.winston.com

338 SOUTH GRAND AVENUE  
LOS ANGELES, CALIFORNIA 90071-16

200 PARK AVENUE  
NEW YORK, NEW YORK 10166-4163

25 AVENUE MARCEAU  
75119 PARIS, FRANCE

101 CALIFORNIA STREET  
SAN FRANCISCO, CALIFORNIA 94111-46

## PERSONAL AND CONFIDENTIAL

April 18, 2008

### BY FACSIMILE AND BY MAIL

Prince Albert II  
His Serene Highness The Sovereign Prince of Monaco  
Palace Princier de Monaco  
MC 98000 Monaco

Re: **Employment of Mr. Robert Eringer**

Dear Your Serene Highness:

We represent Mr. Robert Eringer. For five-and-a-half years, Mr. Eringer provided intelligence services to you and the Principality with the highest degree of competence and loyalty. Unfortunately, Mr. Eringer has not been paid for his services to date and has not been given any explanation for this failure. Indeed, his efforts to communicate with your staff or you have elicited no response. As a result, Mr. Eringer retained this firm to protect his interests in this matter.

As you know, beginning on July 1, 2002, Mr. Eringer provided countless valuable services to Monaco, in furtherance of your stated goal of having Monaco perceived as a responsible member of the community of nations. These services included:

- *Establishing ties with intelligence services around the world*, including those from Italy, Israel, France, the Netherlands, Switzerland, Poland, Ukraine, Slovenia, and Bulgaria. Mr. Eringer also spearheaded the creation of a "micro-European" intelligence association—known as the Columbus Group—that allied the intelligence services of the smallest European nations, including Liechtenstein, Luxembourg, San Marino, and Malta.
- *Strengthening ties with U.S. and British intelligence*. Mr. Eringer created liaison relationships with the Central Intelligence Agency and the British Secret Intelligence Service. He introduced you to members of Congressional intelligence committees and

His Serene Highness The Sovereign Prince of Monaco

April 18, 2008

Page 2

CIA station chiefs, arranged private meetings with CIA Director Porter Goss and FBI Director Robert Mueller, and coordinated private briefings from the CIA on critical issues to the Principality, such as money laundering, terrorism, and organized crime.

- *Protecting Your Serene Highness from association with potentially embarrassing figures.* Mr. Eringer repeatedly investigated acquaintances that you identified and other individuals, providing you with sensitive information about their activities to protect you from potential embarrassment. This included organized crime figures, international arms dealers, and money launderers, as well as numerous citizens of Monaco.
- *Conducting a public relations campaign to position Your Serene Highness as a strong leader who would fight organized crime and cleanse Monaco of corruption.* Mr. Eringer launched Operation Scribe, which placed stories in newspapers about Your Serene Highness's success in combating corruption.
- *Vetting government officials for possible corruption.* Mr. Eringer screened potential government officials and made recommendations about their employment. These individuals included Franck Biancheri, Jean-Luc Allavena, Phillippe Narmino, and Bruno Philippinat.
- *Safeguarding the independence of the Monaco football team.* Mr. Eringer screened potential investors in the team for ties to organized crime and investigated individuals who allegedly were taking bribes and kickbacks from the team.

Mr. Eringer also provided personal services to Your Serene Highness of a very sensitive nature. For example, he assisted in behind-the-scenes negotiations with Tamara Rotolo over the recognition of Jazmin Grace Grimaldi as your daughter. He also launched Operation Hound Dog, which identified persons who were spreading malicious information about Your Serene Highness.

For more than five years, Mr. Eringer worked on projects at your direction, often under trying circumstances and with no small personal risk given some of the characters involved. Mr. Eringer handled his tasks adroitly and with the greatest discretion. Although he never signed a confidentiality agreement, Mr. Eringer has consistently maintained the privacy of the sensitive information that he possesses. He has never published any information that was not already widely known or disclosed it to third parties out of loyalty to Your Serene Highness. He understandably is distressed that his loyalty has not been reciprocated.

The most glaring example of the lack of reciprocity is the manner in which you chose to discontinue communications with Mr. Eringer. Despite his frequent efforts to update you, he did not receive the courtesy of any response, much less an explanation as to his status. In the meantime, he passed up other employment opportunities. He similarly turned down other opportunities for employment during the more than five years he assisted Your Serene Highness.



WINSTON & STRAWN LLP

His Serene Highness The Sovereign Prince of Monaco

April 18, 2008

Page 3

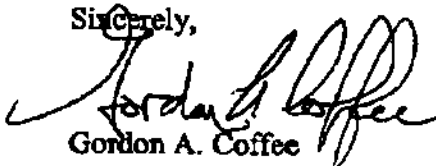
Mr. Eringer further has not been paid in full for his efforts. Mr. Eringer did not receive payment for the first quarter of 2008, during which the agreed compensation was €40,000, representing a reduction in the previously agreed amount of €80,000. Your office further has offered no justification for this failure.

At this juncture, it appears that Your Serene Highness has no further desire to utilize Mr. Eringer's services. While we do not dispute your right to terminate the relationship, all accounts nevertheless should be brought current. We accordingly demand on Mr. Eringer's behalf immediate payment of €40,000 owed on the outstanding invoice from the first quarter of 2008. We further demand €320,000 as a severance payment. Given Mr. Eringer's long period of service to Monaco and you, the extent to which he used prior payments to defray expenses and to pay third parties acting for the benefit of the Principality, the foregone alternate business opportunities, and prevailing business customs in Europe, a severance reflecting one year's compensation is more than fair under the circumstances.

We accordingly request a total payment of €360,000. In return, Mr. Eringer is willing to sign an agreement (1) releasing any further claims against the Principality and you and (2) safeguarding the information he acquired during his tenure.

Thank you for your prompt attention to this matter.

Sincerely,



Gordon A. Coffee

cc: M. Claude Palmero, Administrateur des Biens