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RICKS LAW
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Attorney for Plaintiff, Robert Eringer

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ROBERT ERINGER, an individual,
Plaintiff,
vs.
PRINCIPALITY OF MONACO
Defendant.

Case No.: 2:10-cv-01803-GAF-RC

**FIRST AMENDED VERIFIED
COMPLAINT FOR BREACH OF
CONTRACT AND FRAUD**

PLAINTIFF ALLEGES:

JURISDICTION

1. This Court has original jurisdiction pursuant to 28 U.S.C. § 1330, as an action against a foreign state. The Court has supplemental jurisdiction over the state law claims alleged in this Complaint pursuant to 28 U.S.C. § 1367.

VENUE

2. The contract at issue was to be performed in Santa Barbara, California. Venue therefore lies in the United States District Court for the Central District of California pursuant to 28 U.S.C. § 1391(f)(1).

INTRADISTRICT ASSIGNMENT

3. Assignment to the Western Division is appropriate because the majority of claims and certain of the transactions, acts, practices and courses of business alleged below occurred within the Central District of California, including Santa Barbara, California.

PARTIES

4. Plaintiff ROBERT ERINGER (“Eringer”) is an individual residing in Santa Barbara, California. He was director of the Monaco Intelligence Service (“MIS”) and acted as spymaster for the Principality of Monaco.

5. Defendant PRINCIPALITY OF MONACO (“Principality”) is a foreign state and employed Eringer to be Director of MIS and to act as its spymaster.

OTHER RELEVANT PARTIES

6. HIS SERENE HIGHNESS PRINCE ALBERT II OF MONACO (“HSH”) is the sovereign ruler of the Principality. HSH retained Eringer to work for the Principality and personally directed and approved Eringer’s services to the Principality. Eringer reported on his activities solely to HSH.

STATEMENT OF FACTS

7. On June 16, 2002, HSH, then Hereditary Prince, retained Eringer, at a meeting in Monaco, to be his intelligence advisor. HSH never reduced this agreement to writing.

8. HSH told Eringer he needed an intelligence advisor to assist him in rooting out corruption, money laundering and organized crime in Monaco. As Hereditary Prince, HSH was preparing for his rule of Monaco as his father was aging. Effective July 1, 2002 Eringer commenced service to HSH for an agreed remuneration of 60,000 Euros each calendar quarter. At the beginning of 2003 this payment was increased to 80,000 Euros each calendar quarter. For a period of two quarters in 2006 this payment was increased to 100,000 Euros, but then later reduced to 80,000 Euros before finally being reduced to 40,000 Euros per quarter for the last quarter of 2007 and first quarter of 2008. Attached as Exhibit A are

1 copies of account statements issued by HSH's Administration des Biens (the
2 French for property manager) for payments made by HSH to Eringer.

3 9. By design and to maintain the clandestine nature of his work, Eringer
4 never resided in Monaco, a tiny city/state in which the presence of a spy and spy
5 agency would be quickly recognized. Instead, with HSH's knowledge and
6 permission, Eringer resided in London, England and later Santa Barbara,
7 California. Eringer directed the intelligence activities in Monaco and elsewhere
8 from his remote offices and would make frequent short visits to Monaco to hold
9 briefings and other meetings.

10 10. HSH confirmed Eringer's position as the Principality's spymaster by
11 issuing to him the following documents attached as Exhibit B:

- 12 • A card signed by HSH stating, "Please give Mr. Robert ERINGER your
13 confidential assistance. He acts on my authority and reports directly to
14 me."
- 15 • A Monaco Intelligence Service card signed by HSH. The identification
16 identifies Eringer as "Director M.I.S."

17 11. On April 6, 2005 HSH's father, Prince Rainier, passed away and HSH
18 became Monaco's Sovereign.

19 12. At a meeting on April 26, 2005, HSH, now as sovereign of the
20 Principality, expanded Eringer's responsibilities to include investigations of
21 current government officials and to perform vetting of government officials before
22 their appointment.

23 13. HSH put Eringer in contact with two officers from SIGER, the tiny
24 political unit of Monaco's police force: Jean-Raymond Gottlieb and Yves
25 Subraud. Immediately, they commenced working together in the investigation of
26 government officials and other targets of investigation as directed by HSH.

1 14. In October 2005, HSH authorized Eringer to brief his in-coming chief of
2 staff Jean-Luc Allavena on Eringer's activities. Eringer worked closely with
3 Allavena throughout his tenure as chief of staff.

4 15. On August 2, 2007, Eringer briefed HSH on his activities, especially
5 concerning the liaison relationships Eringer had established with intelligence
6 services in twenty countries. HSH instructed Eringer to keep this work going.
7 HSH requested that commencing the following quarter in October 2007 Eringer
8 reduce his quarterly fee to 40,000 Euros and solely focus on maintaining and
9 working the liaison relationships with foreign intelligence services.

10 16. On December 2, 2007, HSH and Eringer had a telephone conference to
11 report on Eringer's intelligence activities. On December 17, 2007, Eringer sent
12 HSH his invoice for the first quarter of 2008 requesting payment of 40,000 Euros.
13 On January 28, 2008, Eringer wrote HSH informing him that he is carrying out
14 HSH's last instructions to "keep the doors open" of the intelligence service. The
15 letter included another copy of Eringer's invoice and request for payment. Not
16 having received payment, Eringer sent invoices to HSH again in February and
17 March 2008. On March 25, 2008, Eringer wrote HSH explaining that he has
18 carried out HSH's instructions but had not been paid for the first quarter of 2008
19 and again requested payment. HSH did not respond to these letters or Eringer's
20 voicemails, which was not unusual, as HSH was often difficult to reach. Attached
21 as Exhibit C are copies of the letters and invoices sent to HSH

22 17. With HSH providing no direction or communication, Eringer was in
23 limbo and uncertain if he should shut down the intelligence service or keep this
24 valuable entity operating for HSH. After having worked for one quarter without
25 payment from HSH, Eringer terminated his services.

26 18. On April 18, 2008, Eringer had his Washington, DC based attorneys
27 send HSH a demand for payment. HSH has not responded to this letter a copy of
28 which is attached as Exhibit D.

1 19. Plaintiff alleges that he has performed all obligations to defendant
2 required under the Agreement except those obligations plaintiff was prevented or
3 excused from performing.

4 **FIRST CAUSE OF ACTION**
5 **(Breach of Contract)**

6 20. Plaintiff re-alleges all of the allegations contained in paragraphs 1
7 through 18, inclusive, of this complaint, and incorporates them here by this
8 reference as though fully set forth.

9 21. On June 16, 2002, HSH and defendant entered in an oral Agreement
10 whereby plaintiff would serve as an intelligence advisor and intelligence service
11 director to HSH. Plaintiff's service began July 1, 2002 for an agreed remuneration
12 of 60,000 Euros each calendar quarter. At the beginning of 2003 this payment
13 was increased to 80,000 Euros each calendar quarter. For a period of two quarters
14 in 2006 this payment was increased to 100,000 Euros, but then later reduced to
15 80,000 Euros before finally being reduced to 40,000 Euros per quarter for the last
16 quarter of 2007 and first quarter of 2008. This Agreement continued after HSH
17 became sovereign of the Principality on April 6, 2005 as HSH directed Eringer to
18 make official liaison relationship between Monaco and other foreign intelligence
19 services, to make introductions for HSH to foreign government officials, and to
20 conduct corruption probes of the Principality's government officials, among other
21 official tasks.

22 22. During the period of Eringer's service to the Principality, from July 2003
23 to May 2004 and July 2006 to March 2008, with HSH's knowledge and
24 permission, Eringer resided and worked for the Principality in Santa Barbara,
25 California. From Eringer's office in Santa Barbara, California, he performed many
26 services for the Principality, including but not limited to (1) maintaining, working
27 and servicing liaison relationships with foreign intelligence services, (2)
28 communicating with and instructing deputies in Monaco, (3) sending and receiving

1 communications with sources, assets and informants, (4) performing research, and
2 (5) maintaining telephone contact with HSH and briefing him on matters of
3 concern.

4 23. Defendant breached the Agreement by refusing or failing to pay plaintiff
5 the agreed compensation of 40,000 Euros for the first quarter of 2008 due and
6 payable on January 1, 2008. Plaintiff has performed all obligations to defendant
7 and performed them in Santa Barbara, California.

8 24. As a proximate result of defendant's breach of the Agreement as alleged
9 herein, plaintiff has been damaged in an amount to be proven at trial.

10 **SECOND CAUSE OF ACTION**
11 **(Misrepresentation)**

12 25. Plaintiff hereby incorporates paragraphs 1 through 24 herein as though
13 fully set forth.

14 26. Plaintiff agreed to provide Defendant intelligence advisor and director of
15 intelligence services for payment of 40,000 per quarter.

16 27. Defendant, through its sovereign, HSH, falsely represented that they
17 would pay Plaintiff 40,000 Euros for his services during the first quarter of 2008
18 when they in fact there was no intention of paying him. Plaintiff provided his
19 services as agreed and did not get paid by Defendant.

20 28. At the time the Plaintiff acted, Plaintiff was unaware of Defendant's
21 false statements regarding payment for the first quarter of 2008.

22 29. In consideration of services provided by Plaintiff, Defendant promised to
23 pay to Plaintiff 40,000 Euros due on January 1, 2008.

24 30. Defendant made these promises with the intent to defraud and induce
25 Plaintiff to provide services to Defendant, and without any intention of
26 performance on its behalf.

27 31. At the time the Plaintiff acted, Plaintiff was unaware of Defendant's
28 intentions not to pay for services as promised. Plaintiff acted in justifiable reliance

1 upon Defendant's promises when he provided his services.

2 32. Because of Plaintiff's reliance upon Defendant's conduct, false
3 statements and misrepresentations, Plaintiff has suffered damages in an amount to
4 be proven at trial.

5 157. The Defendant's acts alleged above were willful, wanton, malicious,
6 oppressive and were undertaken with the intent to defraud, and justify the awarding
7 of exemplary and punitive damages.

8
9 WHEREFORE, plaintiff prays as follows:

10 **1. BREACH OF CONTRACT**

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

14 **2. MISREPRESENTATION**

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

18 **3. ON ALL CAUSES OF ACTION**

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

21
22 DATED: March 29, 2010

RICKS LAW

23
24 

25 By _____
26 Brigham J. Ricks
27 Attorney for Plaintiff
28

VERIFICATION

All the above statements are true to the best of my knowledge. I understand that a false statement in this Verified Complaint may subject me to penalties of perjury.



ROBERT ERINGER

STATE OF CALIFORNIA COUNTY OF SANTA BARBARA

Subscribed and sworn to (or affirmed) before me on this 29TH day of MARCH, 2010, by ROBERT ERINGER proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Notary Public Signature

Notary Public Seal

See attached notary

CALIFORNIA JURAT WITH AFFIANT STATEMENT

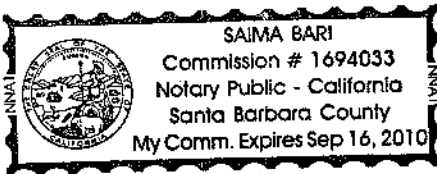
- ☒ See Attached Document (Notary to cross out lines 1-6 below)
☐ See Statement Below (Lines 1-5 to be completed only by document signer[s], *not* Notary)

1 _____
2 _____
3 _____
4 _____
5 _____
6 _____

Signature of Document Signer No. 1 _____ Signature of Document Signer No. 2 (if any) _____

State of California

County of Santa Barbara



Subscribed and sworn to (or affirmed) before me on this

29 day of March, 20 10, by
Date Month Year

(1) Robert Eringer
Name of Signer

proved to me on the basis of satisfactory evidence to be the person who appeared before me (.) (.)

(and

(2) _____
Name of Signer

proved to me on the basis of satisfactory evidence to be the person who appeared before me.)

Signature _____
Signature of Notary Public

Place Notary Seal Above.

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Further Description of Any Attached Document

Title or Type of Document: _____

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

RIGHT THUMBPRINT OF SIGNER #1
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RIGHT THUMBPRINT OF SIGNER #2
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LIST OF EXHIBITS

- EXHIBIT A: Wiring statements
- EXHIBIT B: Note and MIS card
- EXHIBIT C. Letters & invoices to HSH
- EXHIBIT D: Winston & Strawn Letter

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 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
		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 :

[REDACTED]

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

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
				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
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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
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.

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
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.

ADMINISTRATION DES BIENS
PALAIS PRINCIER
98000 MONACO

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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
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.

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
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.

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
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 :

[REDACTED]

[REDACTED]

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

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 13/10/05



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
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.

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.

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 : 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
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 :

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

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
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 :

[REDACTED]

[REDACTED]

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

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
Solde en votre faveur					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.

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
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 :

[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
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 :

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

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 BRETAGNE

Votre 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
Solde en votre faveur					40 000,00

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

[REDACTED]

[REDACTED]

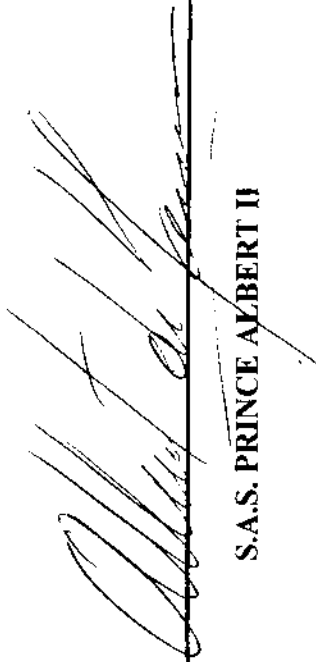
Vous en souhaitant bonne réception, veuillez agréer, Monsieur, Madame, l'assurance de nos sentiments les meilleurs.

EXHIBIT B

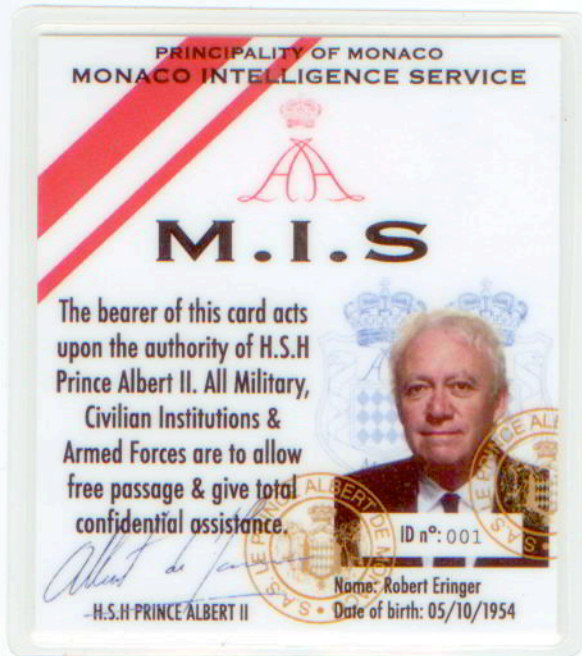
S.A.S. PRINCE ALBERT II

Please give Mr. Robert ERINGER your confidential assistance.

He acts on my authority and reports directly to me.



S.A.S. PRINCE ALBERT II



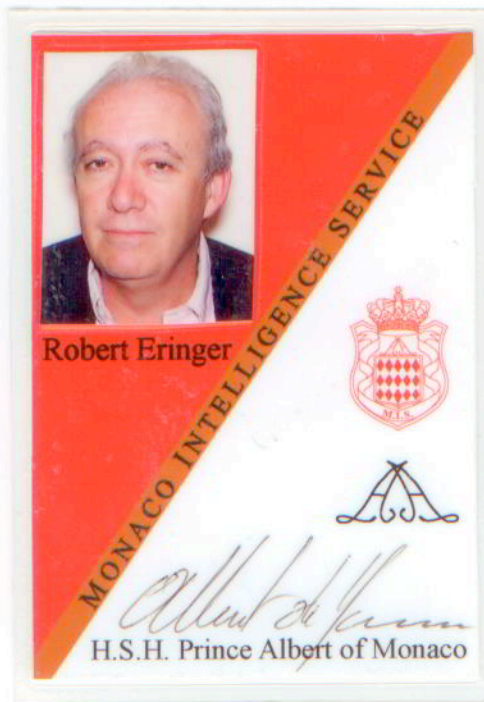


EXHIBIT C

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

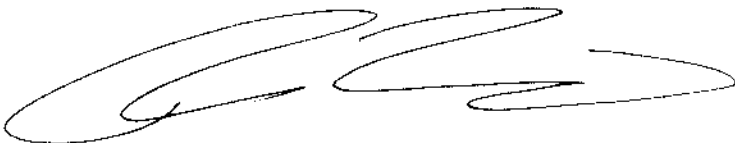
Please wire to:

Mr. Robert Henry Eringer

[REDACTED]

[REDACTED]

Attn. Urs Minder

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, likely belonging to Robert Eringer.

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 long horizontal stroke extending to the right.

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

A handwritten signature in black ink, consisting of a large, stylized 'R' followed by a series of loops and a long horizontal stroke.

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

OVER DUE

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

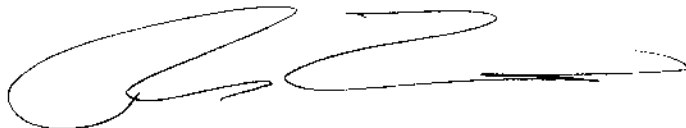
Please wire to:

Mr. Robert Henry Eringer

[REDACTED]

UBS (Monaco) S.A.

Attn. Urs Minder

A handwritten signature in black ink, appearing to be 'R. Eringer', with a long horizontal stroke at the end.

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 16th, 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 2nd. 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 31st 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 1st.

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 D

WINSTON & STRAWN LLP

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CHICAGO, ILLINOIS 60601-9709

43 RUE DU RHONE
1204 GENEVA, SWITZERLAND

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gcoffee@winston.com

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WASHINGTON, D.C. 20006-3617

(202) 282-5000

FACSIMILE (202) 282-5100

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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

WINSTON & STRAWN LLP

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, Phillipe Narmino, and Bruno Philipponnat.
- *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

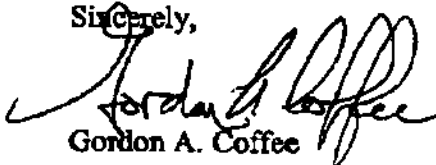
Mr. Eringer further has not been paid in full for his efforts. Mr. Eringer did not receive payment for the first quarter of 2008, during which the agreed compensation was €40,000, representing a reduction in the previously agreed amount of €80,000. Your office further has offered no justification for 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