

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Plaintiff,

V.

21851 Laurel Wood Court

21851 Laurel Wood Court

Case No. _____

2020 Pennsylvania Ave. NW, Ste. 813

OF WASHINGTON, D.C.

Washington, D.C. 20006,

and

INCORPORATED

Richmond, Virginia 23220,

Defendants.

COMPLAINT AND DEMAND FOR JURY TRIAL

1. Plaintiff brings this libel action against Donald Berlin and his web of Defendant corporate entities doing business as Investigative Consultants Inc. (“ICI”), which Berlin uses to defraud people seeking investigative services. To entice its clients into paying tens of thousands of dollars for worthless background reports containing explosive fake accusations about targeted individuals, ICI exaggerates Mr. Berlin’s credentials and makes baseless claims regarding ICI’s investigative abilities and human intelligence sources. In reality, Berlin [REDACTED]

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manufactured imaginary human intelligence sources to back up his demonstrably false lies.

REDACTED

2. On information and belief, ICI is essentially a front for Berlin's fraudulent activities and has no employees other than Berlin and his wife Kimberley. Rather than providing legitimate investigative services, Berlin (through ICI) defrauds consumers by inventing salacious narratives from his own imagination and weaving those false narratives together with manipulated information from the public domain.

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3. In 2002 and 2003, Berlin attempted to defraud Prince Albert II of Monaco (through Robert Eringer), into paying for fake background checks on a number of successful expats living in Monaco, including Plaintiff Christopher Chandler (“Mr. Chandler”) and his brother.

4. To entice payment of tens of thousands of dollars for fake reports containing “derogatory, negative or negative-inference data” about the Chandler brothers, Berlin concocted a 134-page pitch containing false accusations that the Chandlers had engaged in money laundering, organized crime, Russian espionage, and a conspiracy to commit tortious interference (the “Pitch”).³

5. To falsely accuse the Chandler brothers of money laundering and organized crime, Berlin’s Pitch falsely conflates the Chandlers’ Monaco-based personal investment company—Sovereign Asset Management Limited (“Chandler Sovereign”)—with a Bristol-based company called Sovereign Forex Ltd (“Bristol Sovereign”) and Swiss-based companies called Sovereign Forex Ltd, Sovereign Finance Group Ltd, Sovereign Capital Management AG, Sovereign Finance Group Ltd, and Sovereign Bank Corporation Ltd (the “Swiss Sovereign Companies”), which were reportedly engaged in wrongdoing, but which have never had any relationship or affiliation of any kind with the Chandlers. Indeed, Sovereign Forex was apparently incorporated in Switzerland in 1977,⁴ when Mr. Chandler and his brother were teenagers living in New Zealand.

6. The Pitch contains verbatim excerpts from news articles Berlin found on the Internet (that have nothing to do with the Chandlers), which Berlin manipulated to support his false narrative and then falsely attributed to human intelligence sources.⁵

³ Pitch at 18, *passim* (Ex. 1). Plaintiff possesses only the first 34 pages of the Pitch, which are attached as Exhibit 1. The additional 100 pages of the Pitch are referred to as the “Additional Pages.”

⁴ *Id.* at 21.

⁵ Compare, e.g., *Swiss Court Closes Firm in Money Laundering Probe*, TAX-NEWS.COM (Oct. 10, 2002), available at https://www.tax-news.com/news/Swiss_Court_Closes_Firm_In_Money_Laundering_Probe_9642.html (Ex. 2) with Pitch at 3 (Ex. 1).

7. Berlin's Pitch also contains an extended description of a legal dispute between Swiss banking giant Credit Agricole Indosuez ("CAI") and Russia-based National Reserve Bank ("NRB"), plus wholly fabricated accusations tying the Chandlers to the dispute by asserting that they had engaged in a conspiracy with CAI to commit tortious interference against NRB.⁶ But as court records and passport documents show, the Chandler brothers had nothing to do with the dispute between CAI and NRB, were not in Switzerland when the Pitch claims they were there meeting with CAI, and have never had any relationship or dealings of any kind with CAI.⁷ The Pitch attributes Berlin's fanciful conspiracy accusations to "sources that have direct access to quality intelligence in both Switzerland and Russia."⁸ But based on REDACTED the contents of the Pitch and communications with Berlin's attorney prior to the filing of this complaint Plaintiff believes that Berlin had no Swiss or Russian human intelligence sources but simply copied large portions of the Pitch relating to CAI from a report he had previously written for another client-victim, pasted those portions into the Pitch, and then made up and added fake accusations—falsely attributed to non-existent human sources—in an effort to smear the Chandler brothers with false connections to CAI, so that he could sell expensive fake reports.

8. On information and belief, Berlin's Pitch also falsely accused the Chandler brothers of being Russian spies, based in part on false assertions that: (1) in 1999, Mr. Chandler's brother was awarded a "third class" Russian order "For Service to the Fatherland"; and (2) in 2002, Mr. Chandler had organized multiple "dead drops" in France to transfer secret documents, short wave radios, and large sums of money. The accusations of Russian espionage are absolutely false and, on information and belief, were simply made up by Berlin.

⁶ Pitch at 1, 11, *passim* (Ex. 1).

⁷ For example, the Pitch claims that Chandler met with CAI in Geneva, Switzerland in May 1996 and in July 2002 (*Id.* at 2, 15), but Chandler's passport shows that he did not travel to Switzerland in those years.

⁸ *Id.* at 1.

9. Yet because Berlin lacks the Russian expertise and Russian sources he claims to have, he included sloppy details that someone remotely familiar with the subject matter at hand never would have included. **First**, in 1999, it appears that there was no such title as “third class” order for Russia’s “For Service to the Fatherland.”⁹ **Second**, it appears that the Soviet Union ceased to manufacture and issue shortwave radios in 1989,¹⁰ and it would have been impractical and ridiculous to utilize such obsolete technology in 2002, more than ten years after smartphones were invented. Apparently, Berlin uses outdated spy novels as inspiration for his stories.

10. On information and belief, around November 2004, Eringer used the fake information from Berlin’s Pitch as the basis for his own writeup about the Chandler brothers, which he provided to the Prince of Monaco (the “Eringer Report”).¹¹ Indeed, the Eringer Report makes reference to this arrangement, saying “At this point we were willing, at considerable expense, to commission a report from special sources with a proven ability to access the Russian SVR’s registry. Here follows the substance of that report: . . .” (*Id.* at 5.)

11. On information and belief, no one other than Berlin, ICI, and Eringer possessed a copy of Berlin’s Pitch before November 2017. On information and belief, no one other than Eringer and Prince Albert (and possibly some of his representatives) possessed a copy of the Eringer Report until November 2017.

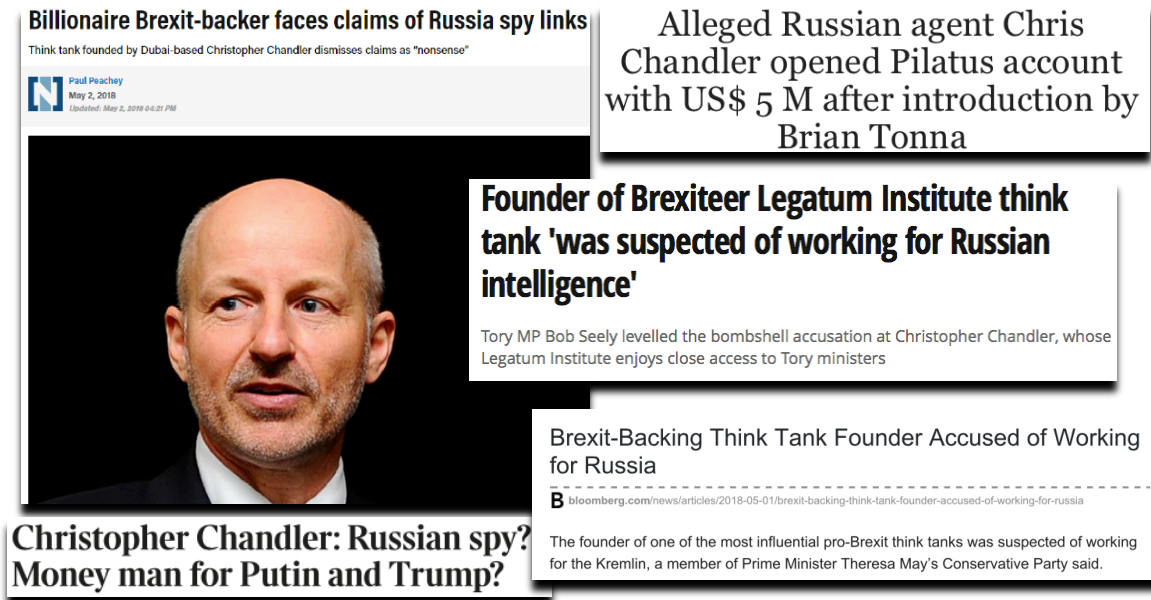
12. On information and belief, in November 2017, Eringer sent the first 34 pages of the Pitch and the Eringer Report (the “Fake Dossier”) to members of the British press.

⁹ See Государственные награды Российской Федерации - [назад](https://orel-region.ru/index.php?head=59&part=55&op=3&id=m2) медаль ордена "За заслуги перед Отечеством" [State awards of the Russian Federation – Medal of the Order “For Services to the Fatherland”], <https://orel-region.ru/index.php?head=59&part=55&op=3&id=m2> (Ex. 3).

¹⁰ See *Spy Radio, Стриж* [Strizh], CRYPTO MUSEUM, <http://www.cryptomuseum.com/spy/r394/strizh.htm> (Ex. 4).

¹¹ Report: The Chandler Brothers (Nov. 2004) (Ex. 5).

13. In May 2018, British media outlets began falsely reporting that Mr. Chandler had been involved in Russian money laundering and espionage, based on the false assertions contained in the Fake Dossier.



14. Mr. Chandler brings this action to prevent Berlin and ICI from defrauding others with worthless fake background reports, to set the record straight, to vindicate his reputation, and to obtain compensatory and punitive damages of at least \$15,000,000.00.

JURISDICTION AND VENUE

15. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332 because there is complete diversity of citizenship between Plaintiff and Defendants and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

16. This Court has personal jurisdiction over all Defendants pursuant to § 13-423 of the District of Columbia Code because Defendants: (i) transacted business within the District of Columbia; (ii) caused tortious injury in the District of Colombia by acts committed within the District of Columbia; (iii) caused tortious injury in the District of Columbia by acts committed outside the District of Columbia while regularly doing business within, engaging in persistent

conduct within, and deriving substantial revenue from goods consumed and services rendered within the District of Columbia; and (iv) on information and belief, had an interest in, used, or possessed real property within the District of Columbia.

17. The exercise of personal jurisdiction over Defendants comports with the Due Process Clause of the United States Constitution for the reasons set forth above.

18. Venue is proper in this Court under 28 U.S.C. § 1391(b) because, on information and belief, a substantial part of the events giving rise to the claims in this Complaint occurred in this District and because Defendants are subject to the Court's personal jurisdiction in this District.

PARTIES

19. Plaintiff Christopher Chandler is an accomplished businessman and investor. He is a citizen of New Zealand and currently resides in the United Arab Emirates.

20. Defendant Donald Berlin is REDACTED
REDACTED the principal, owner, and registered agent of the web of Defendant corporate entities that have done business as Investigative Consultants Inc. ("ICI") out of an office in Washington, D.C. since 1996. Berlin is domiciled in Leesburg, Virginia. At all times relevant to this Complaint, Berlin acted through and as an agent of ICI.

21. Defendant Investigative Consultants, Inc. is an Illinois corporation with its principal place of business at 2020 Pennsylvania Avenue, NW, Ste. 813 in Washington, D.C.

22. Defendant Investigative Consultants, Inc. of Washington, D.C., is a Wisconsin corporation with its principal place of business at 2020 Pennsylvania Avenue, NW, Ste. 813 in Washington, D.C.

23. Defendant Investigative Consultants, Inc. is a Virginia corporation with its reported office located at Mr. Berlin's home address of 21851 Laurel Wood Court, Leesburg, Virginia.

However, on information and belief, this Defendant's principal place of business is at 2020 Pennsylvania Avenue, NW, Ste. 813 in Washington, D.C.

24. Defendant Investigative Consultants Incorporated is a terminated Virginia corporation. According to corporate records, it previously maintained an office at 409 S. Pine Street, Richmond, Virginia 23220. However, on information and belief, this Defendant's principal place of business was at 2020 Pennsylvania Avenue, NW, Ste. 813 in Washington, D.C.

FACTUAL ALLEGATIONS

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25. Since 1977, Donald Berlin has owned, operated, and acted as an agent for a web of corporate entities doing business as ICI, which purports to be an investigations firm.

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28. In or around 1996, Berlin fled Chicago and set up his illicit ICI operation in Washington, D.C.

29. On information and belief, Berlin and ICI scam consumers by falsifying ICI's expertise, resources, and abilities, and by churning out expensive fake background reports containing salacious false claims concerning their research targets.

30. ICI's website claims it compiles reports by relying on "proprietary artificial intelligence" and "30 years [sic] experience in data interpretations, criminal investigations, [and] psychology."¹⁴

31. On information and belief, Berlin is ICI's only full-time employee, and his wife Kimberley sometimes provides part-time support. [REDACTED]

32. Berlin's writing is disorganized [REDACTED] and riddled with spelling and grammatical errors [REDACTED]

[REDACTED]

[REDACTED] A few such examples follow:

Indeed [sic], upon rechecking, we learned that CAI was seeking to have Mr. Zyakhirev . . . withdraw from an agreement.¹⁵

The net result was GazProm decided to no longer back NRB's capital stock, where it is believe [sic] that they had a 30% position. It is believe [sic] that Mr. Chandler is being assisted by an elusive individual¹⁶

The Chandler's [sic] were able to provide substantial assistance¹⁷

E) Chandler's [sic] Links to Organized Crime¹⁸

The Chandler's [sic] told this unidentified vice president that their company, Sovereign [sic] Forex represented the interests of former Russian nationals¹⁹

The Chandlers were deeply involved in real estate in Hong King [sic].²⁰

¹⁴ See Investigative Consultants Inc., *About Us*, <https://www.icioffshore.com/about/dynamicindex5/> (last visited Sept. 10, 2018).

¹⁵ Pitch at 8 (Ex. 1).

¹⁶ *Id.* at 1.

¹⁷ *Id.* at 2.

¹⁸ *Id.* at 3.

¹⁹ *Id.* at 7.

²⁰ *Id.* at 16.

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***After Working as a Tabloid Writer and Barkeep,
Robert Eringer Dubs Himself the “Spymaster” of Monaco.***

35. After working as a tabloid writer and barkeep, Eringer moved to Monaco. During his time in the city-state, he ingratiated himself to Prince Albert II and, in 1999, told the Prince that he could unmask traitors in Monaco and expose individuals who were concealing fraudulent financial activity and money laundering.

36. In 2002, Eringer christened himself “Agent 001” and dubbed his unsolicited work for Prince Albert as the “Monaco Intelligence Service.” According to Prince Albert, Eringer’s so-called “Monaco Intelligence Service” never existed administratively or legally.

***Berlin and ICI Use the Pitch in an Effort to Defraud
the Prince of Monaco out of Tens of Thousands of Dollars.***

37. On information and belief, before 2002, Berlin knew Eringer, and was familiar with his activities and character.

38. On information and belief, Eringer contacted Berlin and ICI in the fall of 2002 to conduct background investigations into a number of successful residents of Monaco, including Mr. Chandler and his brother.

39. On information and belief, Berlin drafted and published the Pitch to Eringer on February 24, 2003, to entice payment of tens of thousands of dollars for fake information about Mr. Chandler and his brother. From ICI's website:

At ICI, we never charge for any proposals for our clients. Our proposals will provide you a few details regarding your subject. It is done this way to insure [sic] that we have targeted the correct person and therefore, can provide you an accurate estimate to do the full Global Scan® Service search.²²

40. The Pitch marketed the following products:

Investigative Consultants Inc.'s Product²³	Cost
Homeland Human Intelligence Asset Scan (Russia & Monaco)	\$29,000
Homeland Human Intelligence Asset Scan (New Zealand, Australia, Nauru, & Hong Kong)	\$19,300
Global Scans of Mr. Chandler and his brother	\$25,600
Global Scan of Chandler-Controlled Company	\$19,200
Archive Data	\$4,590
TOTAL:	\$97,690

41. To entice payment of the prices set forth above, the Pitch falsely accused Mr. Chandler and his brother of engaging in money laundering, organized crime, conspiracy to commit tortious interference, and Russian espionage.

42. To support his false accusations of money laundering and organized crime, Berlin's Pitch falsely asserts that the Chandler brothers control various companies with the word "Sovereign" in their names, which reportedly engaged in wrongdoing: (1) a Bristol-based company called Sovereign Forex Ltd ("Bristol Sovereign"); (2) Swiss-based companies called Sovereign Forex Ltd, Sovereign Finance Group Ltd, Sovereign Capital Management AG, Sovereign Finance Group Ltd, and Sovereign Bank Corporation Ltd (the "Swiss Sovereign Companies"). The Pitch

²² See Investigative Consultants Inc., *Our Products/Global Scan*, <http://www.icioffshore.com/product/dynamicindex10/> (last visited Sept. 10, 2018).

²³ Pitch at 18 (Ex. 1).

also falsely asserts that “the Chandler brothers directly or indirectly control” certain companies that the Pitch claims “are related to Sovereign Foux,” one of the companies reportedly engaged in wrongdoing.

43. For example, the Pitch says:

Sovereign Foux [sic] is another company that is owned by the Chandlers The company is very complex, and is basically a front for Russians Our sources indicate[d] that Sovereign Foux [sic] is a major money-laundering source for the Chandlers.²⁴

44. Mr. Chandler and his brother have no ownership or affiliation of any kind with Sovereign Foux. When Sovereign Foux was founded in Switzerland in 1977, the brothers were teenagers living in New Zealand. Although the brothers’ personal investment company had the word “Sovereign” in its name, neither brother, nor any company affiliated with them has ever had any affiliation or relationship of any kind with Sovereign Foux, Bristol Sovereign, or the Swiss Sovereign Companies.

45. According to Berlin’s Pitch, one of his purported international human sources with connections to “authorities in Switzerland” informed him that Swiss authorities shut down “Sovereign Finance Group” because of money laundering activities.²⁵ In reality, Berlin lied about having such a source, and simply copied that information *verbatim* from a Tax-News.com article he found on the internet (which was about the Swiss Sovereign Companies that are totally unrelated to the Chandlers):

²⁴ *Id.* at 19.

²⁵ *Id.* at 13.

Tax-News.com Article ²⁶	Berlin's Pitch ²⁷
<p>Dow Jones Newswires reported on Tuesday that a Swiss court has ordered the Zurich-based Sovereign Finance Group to close following alleged money laundering activities in Russia and the Caribbean. The news agency revealed that the Swiss Federal Banking Commission ruled at the end of September that the group should be shut down.</p>	<p>On October 7th [sic] 2002, the Swiss investigation resulted in a number of legal actions against Sovereign Finance Group when a Swiss court ordered the company closed because of alleged money laundering activities in Russia and the Caribbean. <u>It is our understanding from this source</u> that the Swiss Federal Banking Commission ruled at the end of September that the group should be shut down.</p>

46. Similarly, on April 2, 2002, French daily newspaper *Le Monde* published an article detailing how two men named Arkady Gaydamak and Pierre-Joseph Falcon—who have zero connections to the Chandlers—plundered millions of dollars of funds that were earmarked to repay Angolan debt to Russia. Although the *Le Monde* article had nothing to do with the Chandlers, Berlin copied a portion of it and then manipulated the information to substitute Mr. Chandler and his brother for the alleged wrongdoers and make it appear as though the brothers were laundering money for Russians.

Le Monde Article ²⁸	Berlin's Pitch ²⁹
<p>Mr. Falcone opened accounts in 1998 with the names of three Panamanian companies (Dramal, Camparal and Tutorial), at the International Bank of Luxembourg (BIL).</p>	<p>[Credit Agricole] has been opening accounts for them [the Chandlers] in the name of Panamanian registered companies such as Dramal, Camparal, and Tutorial [sic] at the International Bank of Luxembourg (BIL).</p>

²⁶ *Swiss Court Closes Firm in Money Laundering Probe*, TAX-NEWS.COM (Oct. 10, 2002), https://www.tax-news.com/news/Swiss_Court_Closes_Firm_In_Money_Laundering_Probe_9642.html (Ex. 2).

²⁷ Pitch at 3 (Ex. 1).

²⁸ *Fabrice Lhomme & Piotr Smolar, Le règlement de la dette angolaise aurait donné lieu à des détournements de fonds* [Angolan debt settlement allegedly embezzled funds], LE MONDE (April 2, 2002), https://www.lemonde.fr/archives/article/2002/04/03/le-reglement-de-la-dette-angolaise-a-ait-donne-lieu-a-des-detournements-de-fonds_4243463_1819218.html?xtmc=russo_angolais&xtcr=6 (Ex. 9).

²⁹ Pitch at 5 (Ex. 1).

47. In reality, neither Mr. Chandler nor his brother has ever laundered money and they have no affiliation of any kind with Gaydamak, Falcone, Dramal, Camparal, or Tutorial.

48. The Pitch also falsely accuses the Chandlers of “conspiracy to commit tortious interference,” based on an imaginary relationship between the Chandler brothers, on the one hand, and CAI, on the other hand. In essence, the Pitch claims that CAI recruited the brothers to help drive NRB out of business. These accusations are totally false; the Chandler brothers never engaged in conspiracy to commit tortious interference and they never had any relationship or dealings of any kind with CAI. While the Pitch claims that Mr. Chandler met with CAI in Geneva, Switzerland in May 1996 and in July 2002, Mr. Chandler’s passport shows that he did not travel to Switzerland in those years.

49. On information and belief, in the Additional Pages of the Pitch, Berlin falsely accused Mr. Chandler of money laundering and organized crime, based on the false premise that Mr. Chandler and his brother are affiliated with Sovereign Forex, Bristol Sovereign, and the Swiss Sovereign Companies.

50. On information and belief, in the Additional Pages, Berlin also falsely accused the Chandlers of being Russian spies, based in part on: (1) false accusations that Mr. Chandler and his brother participated in “dead drops” (including of short wave radios in 2002); and (2) the false accusation that in 1999, Mr. Chandler’s brother was awarded a “third class” Russian order “For Service to the Fatherland.”

51. These accusations are totally false. The Chandler brothers have never been spies for any nation, let alone Russia.

52. In 1999, there was apparently no such thing as a “third class” order for Russia’s “For Service to the Fatherland.”³⁰

53. On information and belief, Russian intelligence agencies did not use short wave radios 2002 because, at that point, short-wave radios were outdated and had been supplanted by more modern technology.

***Eringer Writes a Fake Report Based on
the False Information Berlin and ICI Manufactured and Provided.***

54. On information and belief, around November 2004, Eringer used the fake information from Berlin’s Pitch as the basis for the Eringer Report, and gave the Eringer Report to the Prince of Monaco.

55. The Eringer Report states that Eringer decided “to commission a report from special sources with a proven ability to access the Russian SVR’s registry” and that he did so “at considerable expense.” On information and belief, this refers to the purchase of the false information from Berlin and ICI.

56. In the Eringer Report, Eringer repeats the bogus claims made in Berlin’s Pitch about Mr. Chandler.

***Berlin’s Pitch and the Eringer Report Are Circulated to the British Media,
Causing Enormous Harm to Mr. Chandler and His Brother.***

57. On information and belief, Eringer sent the Fake Dossier to members of the British press in November 2017.

³⁰ See Государственные награды Российской Федерации - [назад](https://orel-region.ru/index.php?head=59&part=55&op=3&id=m2) медаль ордена “За заслуги перед Отечеством” [State awards of the Russian Federation – Medal of the Order “For Services to the Fatherland”], <https://orel-region.ru/index.php?head=59&part=55&op=3&id=m2> (Ex. 3).

58. In May 2018, British media outlets began falsely reporting that Mr. Chandler had been involved in Russian money laundering and espionage, based on the false assertions contained in the Fake Dossier.³¹

³¹ See, e.g., TOM HARPER, JON UNGOED-THOMAS & RICHARD KERBAJ, *Brexit, dirty tricks and an international game of I spy*, THE SUNDAY TIMES (Dec. 3, 2017, 12:01 AM), <https://www.thetimes.co.uk/article/233de870-d78a-11e7-945f-b625fa742a9e>; ROBERT HUTTON & JESS SHANKLEMAN, *Brexit-Backing Think Tank Founder Accused of Working for Russia*, BLOOMBERG (May 1, 2018, 1:36 PM), <https://www.bloomberg.com/news/articles/2018-05-01/brexit-backing-think-tank-founder-accused-of-working-for-russia>; DAN BLOOM, *Founder of Brexiteer Legatum Institute think tank 'was suspected of working for Russian intelligence'*, MIRROR (May 1, 2018, 6:36 PM), <https://www.mirror.co.uk/news/politics/founder-brexiteer-legatum-institute-think-12461710>; LUKE HARDING, *Founder of pro-Brexit thinktank has link with Russian intelligence, says MP*, THE GUARDIAN (May 1, 2018, 1:57 PM), <https://www.theguardian.com/world/2018/may/01/christopher-chandler-founder-of-pro-brexit-thinktank-has-link-with-russian-intelligence-mp-says>; DEBORAH HAYNES & LUCY FISHER, *MP accuses founder of pro-Brexit Legatum Institute of being Russian agent*, THE TIMES UK (May 1, 2018, 5:00 PM), <https://www.thetimes.co.uk/article/mps-accuse-founder-of-pro-brexit-legatum-institute-of-being-russian-agent-0wlwm5jfx>; JON CRAIG, *MP accuses founder of pro-Brexit Legatum Institute of Russian links*, SKY NEWS (May 1, 2018, 8:51 PM), <https://news.sky.com/story/mp-accuses-founder-of-pro-brexit-legatum-institute-of-russia-links-11355202>; DANIEL MARTIN, *MP accuses pro-Brexit think tank founder of being a Russian spy: Tory member uses parliamentary privilege to claim billionaire was an 'object of interest' to French intelligence*, DAILY MAIL UK (May 1, 2018, 5:49 PM), <http://www.dailymail.co.uk/news/article-5680151/MP-accuses-pro-Brexit-think-tank-founder-Russian-spy.html>; NED SIMONS, *Pro-Brexit Think-Tank Founder Accused By Tory MP Of Links To Russian Intelligence*, HUFFINGTON POST UK (May 1, 2018, 5:10 PM), https://www.huffingtonpost.co.uk/entry/pro-brexit-think-tank-founder-accused-by-tory-mp-of-links-to-russian-intelligence_uk_5ae884a7e4b02baed1be52e2?guccounter=1; *Alleged Russian agent Chris Chandler opened Pilatus account with US\$ 5 M after introduction by Brian Tonna*, MANUELDELIA.COM (May 2, 2018, 9:27 AM), <https://manueldelia.com/2018/05/alleged-russian-agent-chris-chandler-opened-pilatus-account-with-us-5-m-after-introduction-by-brian-tonna/>; PAUL PEACHEY, *Billionaire Brexit-backer faces claims of Russia spy link*, THE NATIONAL (May 2, 2018, Updated 4:21 PM), https://www.thenational.ae/world/europe/billionaire-brexit-backer-faces-claims-of-russia-spy-links-1.726657tory-mp-of-links-to-russian-intelligence_uk_5ae884a7e4b02baed1be52e2?guccounter=1; LATIKA BOURKE, *British MP claims Kiwi think tank owner has Russian intel links*, SIDNEY MORNING HERALD (May 2, 2018, 7:19 AM), <https://www.smh.com.au/world/europe/british-mp-claims-kiwi-think-tank-owner-has-russian-intel-links-20180502-p4zcrw.html>; *Former MI6 chief worked with Legatum Institute's Chandler*, INTELLIGENCE ONLINE (May 2, 2018), <https://www.intelligenceonline.com/corporate-intelligence/2018/05/02/former-mi6-chief-worked-with-legatum-institute-s-chandler.108309053-bre>; DEBORAH HAYNES, LUCY FISHER, OLIVER WRIGHT, CATHERINE PHILP, *Pro-Brexit think tank founder 'suspected of working for Russia'*, THE TIMES UK (May 2, 2018, 12:01 AM), <https://www.thetimes.co.uk/article/pro-brexit-think-tank-founder-christopher-chandler-suspected-of-working-for-russia-xpghf6k3z>; *Founder of Legatum, think-tank known for anti-Russia analysts, accused of links to Russian Intel*, REUTERS UK NEWS (May 3, 2018, 10:08 AM), <https://www.rt.com/uk/425714-brexit-legatum-parliament-seely/>; PETER GEOGHEGAN & JENNA CORDEROY, *Revealed: Legatum's "extraordinary" secretive monthly meetings with Brexit minister*, OPEN DEMOCRACY UK (May 4, 2018), <https://www.opendemocracy.net/uk/brexitinc/peter-geoghegan/revealed-legatum-s-extraordinary-secretive-monthly-meetings-with-brexit>; PETER GEOGHEGAN, *Russian-linked think tank held monthly meetings with leading Brexit minister*, I NEWS UK (May 4, 2018), <https://inews.co.uk/news/brexit/russian-linked-think-tank-held-monthly-meetings-with-leading-brexit-minister/>; OLIVER WRIGHT, *Tycoon Christopher Chandler attacks MPs who branded him Kremlin agent*, THE TIMES UK (May 4, 2018, 12:01 AM), <https://www.thetimes.co.uk/article/tycoon-christopher-chandler-attacks-mps-who-branded-him-kremlin-agent-3526wmmwbk>; REBECCA STEVENSON, *Who is reclusive Kiwi billionaire Christopher Chandler? And is he a Russian spy?*, THE SPINOFF (May 4, 2018), <https://thespinoff.co.nz/business/04-05-2018/who-is-reclusive-kiwi-billionaire-christopher-chandler-and-is-he-a-russian-spy/>; *Billionaire accused in UK of being suspected Russian agent has Maltese passport*, INDEPENDENT (May 7, 2018, 2:41 PM), <http://www.independent.com.mt/articles/2018-05-07/local-news/Billionaire-accused-in-UK-of-being-suspected-Russian-agent-has-Maltese-passport-6736189444>;

59. Defendants’ false accusations in the Fake Dossier have caused enormous harm to Mr. Chandler.

COUNT ONE – LIBEL PER SE
The First 34 Pages of the Pitch
(Against All Defendants)

60. Mr. Chandler repeats and re-alleges each of the foregoing paragraphs as if set forth fully herein.

61. On information and belief, on or before February 24, 2003, Berlin composed the Pitch for the purpose of enticing payment of tens of thousands of dollars for fake reports containing false “derogatory, negative or negative-inference data” about Mr. Chandler.³²

62. On information and belief, on or about February 24, 2003, Berlin privately sent the Pitch to Eringer. On information and belief, no one other than Berlin or Eringer had a copy of the Pitch until November 2017, when Eringer sent the first 34 pages of the Pitch and the Eringer Report (the “Fake Dossier”) to members of the media. The British press began publishing the false

TOM HARPER & OLIVER SHAH, *Christopher Chandler: Russian spy? Money man for Putin and Trump? No – I’m just a shy billionaire*, SUNDAY TIMES (May 13, 2018, 12:01 AM), <https://www.thetimes.co.uk/article/christopher-chandler-spy-money-man-for-putin-and-trump-no-im-just-a-shy-billionaire-2h58mbmqh>; HENRY ZEFFMAN, *Tycoon Christopher Chandler’s firm ‘launched coup with Putin’*, THE TIMES UK (May 14, 2018, 12:01 AM), <https://www.thetimes.co.uk/edition/news/tycoon-christopher-chandler-s-firm-launched-coup-with-putin-279lt6sjl>; DAN HODGES, *DAN HODGES: Putin really IS coming to get you...and our leaders are doing nothing about it*, DAILY MAIL UK (May 19, 2018, 7:59 PM), <http://www.dailymail.co.uk/debate/article-5749369/DAN-HODGES-Putin-really-coming-leaders-doing-it.html>; GLEN OWEN, *We WON’T be bullied by you, MPs tell Brexit tycoon with links to Kremlin*, DAILY MAIL UK (May 19, 2018, 7:26 PM), <http://www.dailymail.co.uk/news/article-5749267/Pro-Brexit-think-tank-backer-accused-trying-threaten-MPs-investigation-Russian-links.html>; HOLLY WATT, *Pro-Brexit thinktank broke charity rules on politics, watch dog says*, THE GUARDIAN (May 31, 2018, 7:01 PM), <https://www.theguardian.com/politics/2018/jun/01/pro-brexit-thinktank-legatum-institute-broke-charity-rules-politics-watchdog>; PETER GEOGHEGAN, *Think tank ‘crossed the line’ on Brexit, Charity Commission finds*, THE FERRET (June 1, 2018), <https://theferret.scot/legatum-brexit-charity-commission/>; PETER GEOGHEGAN, *Legatum breached charity regulations with Brexit work, charity Commission finds*, OPEN DEMOCRACY (June 1, 2018), <https://www.opendemocracy.net/uk/peter-geoghegan/legatum-breached-charity-regulations-with-brexit-work-charity-commission-finds>; *Legatum Institute criticised by Charity Commission*, FINANCIAL TIMES (June 1, 2018), <https://www.ft.com/content/50952a76-64da-11e8-a39d-4df188287fff>; MARTIN BECKFORD, *Brexit’s secret Putin connection: Nigel Farage’s bankroller met Russian envoy three times then hooked him up with Trumps’s team, as MI5 is urged to act*, MAIL ONLINE (June 9, 2018, 10:01 PM), <http://www.dailymail.co.uk/news/article-5825129/Nigel-Farages-bankroller-met-Russian-envoy-three-times-hooked-Trumps-team.html> (Ex. 10).

³² Pitch at 18 (Ex. 1).

accusations from the Fake Dossier in May 2018. On information and belief, neither the Pitch nor the Eringer Report was publicly available, published online, or published by any media outlet before May 2018.

63. Personally, and through his agents, Mr. Chandler regularly monitors the press for articles that mention him. Although Mr. Chandler first learned of the false accusations of Russian espionage and money laundering in November 2017, he did not receive a copy of the first 34 pages of the Pitch or the Eringer Report until May 2018.

64. The first 34 pages of the Pitch contain the following libelous false accusations about Mr. Chandler: that he engaged in “money laundering,” “laundering money,” and a “money-laundering scheme;” worked for and was involved with “organized crime;” and engaged in “conspiracy to commit tortious interference.” The Pitch repeatedly and falsely accuses Mr. Chandler of these crimes, both directly and through false purported affiliations with companies that Mr. Chandler is not affiliated with in any way, including: (1) Bristol Sovereign, (2) the Swiss Sovereign Companies, and (3) CAI (Bristol Sovereign, the Swiss Sovereign Companies, and CAI are referred to collectively as the “Unrelated Companies”).

65. The libelous false statements in the Pitch are of and concerning Mr. Chandler, who is: (1) one of two subjects of the Pitch, (2) repeatedly identified by name throughout the Pitch, and (3) identified in the Pitch as the owner, controller, or affiliate of the Unrelated Companies that the Pitch accuses of being used for criminal activities. Berlin intended that any reader of the Pitch would understand the libelous false statements—including the statements about the Unrelated Companies—to be of and concerning Mr. Chandler, and the statements were so understood by those who read them. Indeed, Berlin’s Pitch appears to have been the source of some of the false statements in the Eringer Report titled: “Report: The Chandler Brothers,” showing that Eringer

understood the statements in Berlin's Pitch to be of and concerning Mr. Chandler and his brother.

66. The statements are libelous *per se* because they falsely impute the commission of indictable offenses involving moral turpitude that injure one's social standing.

67. The libelous statements are false. Mr. Chandler and his brother have never—either directly or indirectly through the use of companies—engaged in money laundering, organized crime, or conspiracy to commit tortious interference. More specifically:

- (a) ***Companies with the word "Sovereign" in their names.*** Mr. Chandler and his brother did not fund—and have never had any relationship of any kind with—Sovereign Forex, Bristol Sovereign, or the Swiss Sovereign Companies, nor did they have any involvement in the nefarious activities that the Pitch claims those companies were engaged in. When Sovereign Forex was incorporated in Switzerland in 1977, Mr. Chandler and his brother were teenagers living in New Zealand.³³ Although the Chandler brothers invested through a company that had the word "Sovereign" in its name ("Chandler Sovereign"), that company has never had any relationship of any kind with Sovereign Forex, Bristol Sovereign, or the Swiss Sovereign Companies. Chandler Sovereign was originally formed in Monaco and later relocated to Dubai. The only connection between the Chandler Sovereign, on the one hand, and Sovereign Forex, Bristol Sovereign, and the Swiss Sovereign Companies, on the other hand, is a simple coincidence: they happen to have the word "Sovereign" in their names. Chandler Sovereign is not a "front company," nor is it controlled by Gazprom. Chandler Sovereign never purchased any Gazprom shares on behalf of any Gazprom senior executives, nor was it ever intended the Chandler Sovereign would do so.
- (b) ***Organized Crime.*** Mr. Chandler and his brother have never worked for or enjoyed the "protection" of any Russian organized crime group, the Solnetsevo Group, the Far Eastern Group, Vladimir Putin, or Boris Yeltsin. The brothers never created any offshore companies to represent the interests of Russian organized crime members.
- (c) ***Money Laundering.*** Mr. Chandler and his brother have never engaged in money laundering. Neither of the brothers nor their companies have relationships—let alone money-laundering relationships—with the senior management of Lukoil or UES. The Chandlers do not, either directly or through their companies, launder money or hold shares for BP/Amoco, Total/Fina/Elf, or the Trump Group. CAI never forwarded any funds to companies created by the Chandler brothers on behalf of their customers in

³³ See Pitch at page 21.

cash haven countries, such as Nauru, Cayman Islands, British Virgin Islands, or other localities. Mr. Chandler and his brother never created any such companies on behalf of any customers.

- (d) ***Vladimir Putin.*** The Chandler brothers never used Sovereign Forex to buy \$10 million worth of Yukos and Gazprom shares for Russian President Vladimir Putin. They do not know, have never communicated with, and have never done any work for Putin. As set forth above, they have never had any affiliation of any kind with Sovereign Forex.
- (e) ***Mikhail Kasyanov.*** Mr. Chandler and his brother never acquired \$4 million worth of Gazprom shares for Russian Prime Minister Mikhail Kasyanov. They do not know, have never communicated with, and have never done any work for Kasyanov.
- (f) ***Igor Ivanov.*** Mr. Chandler and his brother never acquired \$1 million worth of Lukoil shares for Russian Foreign Minister Igor Ivanov. They do not know, have never communicated with, and have never done any work for Ivanov.
- (g) ***Col. Donald Scott.*** Mr. Chandler and his brother do not know and have never communicated with or been assisted by Col. Donald Scott or Pasteur Enterprises.
- (h) ***CAI.*** Mr. Chandler and his brother have never had any relationship of any kind with CAI, nor did they have any involvement in the nefarious activities that the Pitch claims that company was engaged in. The Chandlers have never met or communicated with representatives from CAI about NRB, Gazprom, Sovereign Forex, or channeling money from Russian clients through Switzerland to offshore accounts. The Chandlers have never communicated with anyone from CAI. The brothers have never had any relationship with CAI and have never received any fees from CAI. The Chandlers never worked with an International Vice President (or any other employee) of CAI, nor did CAI ever grant Mr. Chandler and his brother access to its Geneva facility. Mr. Chandler and his brother have never been to CAI's Geneva facility. As Mr. Chandler's passport shows, he did not travel to Switzerland in 1996 or 2002, years when the Pitch claims he met with CAI in Geneva, Switzerland. The brothers did not broker the introduction of Credit Agricole Swiss to senior officials of the Libyan government or arrange to transfer \$18 million from Libya to various Russian banks via Credit Agricole Swiss. They have never had any communications with anyone from Credit Agricole Swiss about anything to do with the Libyan government, nor do they know or have any communications with any officials of the Libyan government.
- (i) ***Gazprom.*** Mr. Chandler and his brother historically held a minority stake in Gazprom. Although the Chandlers—along with a consortium of Western

investors—supported the corporate governance reform of electing Russia’s well-respected former minister of finance, Boris Fyodorov, to Gazprom’s board of directors in 2000, they have never worked for Fyodorov. Neither Fyodorov nor other Gazprom executives have ever been customers of the Chandlers, or their companies. The Chandlers have never been “front men” or “front men financiers” for former officials of Gazprom. The brothers never created any offshore companies to represent the interests of high-level former Gazprom executives. They never attempted to influence Rem Vyakhirev (the former president of Gazprom) in the hopes that Vyakhirev would decide that Gazprom would not act as a 30% guarantor of NRB’s registered capital, nor did they ever plan to do so. The brothers never had any communications of any kind about NRB with Vyakhirev. Mr. Chandler and his brother do not have the “protection” of any Gazprom officials or Gazprom board members. They have never made any payments to any former Gazprom officials, either to “secret accounts” created by Sovereign Forex or otherwise. The Chandlers never acquired \$47.5 million worth of Gazprom shares for Total/Fina/Elf, nor did they receive \$1.2 million for handling such acquisition. They never bought \$25 million worth of Gazprom shares for the Bank Credit Agricole Swiss, nor did they receive \$750,000 for such efforts.

68. Berlin and ICI acted with actual malice in publishing the libelous statements in the Pitch. Evidence of their actual malice includes the following:

- From the beginning, Berlin knew he did not have Swiss or Russian human intelligence or other sources and expertise required to provide an accurate background report on the Chandlers, so he set out to prepare a fictitious report about them.
- Berlin intentionally invented salacious accusations about the Chandler brothers in an effort to entice his marks to pay tens of thousands of dollars for additional fake reports about them.
- To this day, even after being informed that his false accusations have caused considerable harm to Mr. Chandler’s reputation, Berlin has refused to repudiate the Pitch and set the record straight.
- On information and belief, discovery of testimony, communications, and documents relating to the financing, research, drafting, and editing of the Pitch will reveal substantial additional evidence of Berlin’s actual malice.
- At all relevant times, Berlin was acting as an agent of ICI, and his actions and evidence of his actual malice is therefore attributable to ICI.

69. Defendants made the libelous statements intentionally, willfully, maliciously, and in conscious disregard of Mr. Chandler’s rights and reputation and of the truth.

70. Defendants had no applicable privilege or legal authorization to publish these false and libelous statements.

71. In addition to injuries presumed by law, these libelous falsehoods have injured—and will continue to injure—Mr. Chandler in at least the following ways:

- (a) By accusing Mr. Chandler of serious crimes;
- (b) By impugning Mr. Chandler's reputation;
- (c) By ascribing to Mr. Chandler conduct that would adversely affect his fitness for proper conduct as a businessman; and
- (d) By causing Mr. Chandler damages in other ways yet to be determined.

72. Defendants are liable to Mr. Chandler for compensatory damages arising out of their defamation of Mr. Chandler.

73. Defendants are also liable to Mr. Chandler for punitive damages because of the wanton and outrageous nature of their conduct.

COUNT TWO – LIBEL PER SE
The Additional Pages of the Pitch
(Against All Defendants)

74. Mr. Chandler repeats and re-alleges each of the foregoing paragraphs as if set forth fully herein.

75. On information and belief, on or before February 24, 2003, Berlin composed the Pitch for the purpose of enticing payment of tens of thousands of dollars for fake reports containing false “derogatory, negative or negative-inference data” about Mr. Chandler.³⁴

76. On information and belief, on or about February 24, 2003, Berlin privately sent the Pitch to Eringer.

77. On information and belief, in November 2017, Eringer first sent the Fake Dossier

³⁴ Pitch at 18 (Ex. 1).

to members of the media. The British press began publishing the false accusations from the Fake Dossier in May 2018. On information and belief, the Fake Dossier was not publicly available, published online, or published by any media outlet before May 2018.

78. Personally, and through his agents, Mr. Chandler regularly monitors the press for articles that mention him. Although Mr. Chandler first learned of the false accusations of Russian espionage and money laundering in November 2017, he did not obtain a copy of the first 34 pages of the Pitch, the Eringer Report, or the Fake Dossier until May 2018. He has not yet obtained a copy of the Additional Pages. On information and belief, the Additional Pages are not publicly available.

79. On information and belief, Additional Pages contain the following libelous false accusations about Mr. Chandler: that he engaged in money laundering, organized crime, and Russian espionage. The Additional Pages falsely accuse Mr. Chandler of these crimes, both directly and through false, purported affiliations with the Unrelated Companies.

80. The libelous false statements in the Additional Pages are of and concerning Mr. Chandler, who is: (1) one of two subjects of the Additional Pages, (2) repeatedly identified by name throughout the Additional Pages, and (3) identified in the Additional Pages as the owner, controller, or affiliate of the Unrelated Companies that the Additional Pages accuse of being used for criminal activities. Berlin intended that any reader of the Additional Pages would understand the libelous false statements—including the statements about the Unrelated Companies—to be of and concerning Mr. Chandler, and the statements were so understood by those who read them. Indeed, the Additional Pages appear to have been the source of some of the false statements in the Eringer Report titled: “Report: The Chandler Brothers,” showing that Eringer understood the statements in the Additional Pages to be of and concerning Mr. Chandler and his brother.

81. The statements are libelous *per se* because they falsely impute the commission of indictable offenses involving moral turpitude that injure one's social standing.

82. The libelous statements are false. Mr. Chandler and his brother have never—either directly or indirectly through the use of companies—engaged in money laundering, organized crime, or Russian espionage. More specifically:

- (a) ***Companies with the word “Sovereign” in their names.*** Mr. Chandler and his brother did not fund—and have never had any relationship of any kind with—Sovereign Forex, Bristol Sovereign, or the Swiss Sovereign Companies, nor did they have any involvement in the nefarious activities that the Pitch claims those companies were engaged in. When Sovereign Forex was incorporated in Switzerland in 1977, Mr. Chandler and his brother were teenagers living in New Zealand.³⁵ Although the Chandler brothers invested through a company that had the word “Sovereign” in its name (“Chandler Sovereign”), that company has never had any relationship of any kind with Sovereign Forex, Bristol Sovereign, or the Swiss Sovereign Companies. Chandler Sovereign was originally formed in Monaco and later relocated to Dubai. The only connection between the Chandler Sovereign, on the one hand, and Sovereign Forex, Bristol Sovereign, and the Swiss Sovereign Companies, on the other hand, is a simple coincidence: they happen to have the word “Sovereign” in their names. Chandler Sovereign is not a “front company,” nor is it controlled by Gazprom. Chandler Sovereign never purchased any Gazprom shares on behalf of any Gazprom senior executives, nor was it ever intended the Chandler Sovereign would do so.
- (b) ***Organized Crime.*** Mr. Chandler and his brother have never worked for or enjoyed the “protection” of any Russian organized crime group, the Solnetsevo Group, the Far Eastern Group, Vladimir Putin, or Boris Yeltsin. The brothers never created any offshore companies to represent the interests of Russian organized crime members.
- (c) ***Money Laundering.*** Mr. Chandler and his brother have never engaged in money laundering. Neither of the brothers nor their companies have relationships—let alone money-laundering relationships—with the senior management of Lukoil or UES. The Chandlers do not, either directly or through their companies, launder money or hold shares for BP/Amoco, Total/Fina/Elf, or the Trump Group. CAI never forwarded any funds to companies created by the Chandler brothers on behalf of their customers in cash haven countries, such as Nauru, Cayman Islands, British Virgin

³⁵ See Pitch at 21 (Ex. 1).

Islands, or other localities. Mr. Chandler and his brother never created any such companies on behalf of any customers.

- (d) ***Vladimir Putin.*** The Chandler brothers never used Sovereign Forex to buy \$10 million worth of Yukos and Gazprom shares for Russian President Vladimir Putin. They do not know, have never communicated with, and have never done any work for Putin. As set forth above, they have never had any affiliation of any kind with Sovereign Forex.
- (e) ***Mikhail Kasyanov.*** Mr. Chandler and his brother never acquired \$4 million worth of Gazprom shares for Russian Prime Minister Mikhail Kasyanov. They do not know, have never communicated with, and have never done any work for Kasyanov.
- (f) ***Igor Ivanov.*** Mr. Chandler and his brother never acquired \$1 million worth of Lukoil shares for Russian Foreign Minister Igor Ivanov. They do not know, have never communicated with, and have never done any work for Ivanov.
- (g) ***Col. Donald Scott.*** Mr. Chandler and his brother do not know and have never communicated with or been assisted by Col. Donald Scott or Pasteur Enterprises.
- (h) ***CAI.*** Mr. Chandler and his brother have never had any relationship of any kind with CAI, nor did they have any involvement in the nefarious activities that the Pitch claims that company was engaged in. The Chandlers have never met or communicated with representatives from CAI about NRB, Gazprom, Sovereign Forex, or channeling money from Russian clients through Switzerland to offshore accounts. The Chandlers have never communicated with anyone from CAI. The brothers have never had any relationship with CAI and have never received any fees from CAI. The Chandlers never worked with an International Vice President (or any other employee) of CAI, nor did CAI ever grant Mr. Chandler and his brother access to its Geneva facility. Mr. Chandler and his brother have never been to CAI's Geneva facility. As Mr. Chandler's passport shows, he did not travel to Switzerland in 1996 or 2002, years when the Pitch claims he met with CAI in Geneva, Switzerland. The brothers did not broker the introduction of Credit Agricole Swiss to senior officials of the Libyan government or arrange to transfer \$18 million from Libya to various Russian banks via Credit Agricole Swiss. They have never had any communications with anyone from Credit Agricole Swiss about anything to do with the Libyan government, nor do they know or have any communications with any officials of the Libyan government.
- (i) ***Gazprom.*** Mr. Chandler and his brother historically held a minority stake in Gazprom. Although the Chandlers—along with a consortium of Western investors—supported the corporate governance reform of electing Russia's

well-respected former minister of finance, Boris Fyodorov, to Gazprom's board of directors in 2000, they have never worked for Fyodorov. Neither Fyodorov nor other Gazprom executives have ever been customers of the Chandlers, or their companies. The Chandlers have never been "front men" or "front men financiers" for former officials of Gazprom. The brothers never created any offshore companies to represent the interests of high-level former Gazprom executives. They never attempted to influence Rem Vyakhirev (the former president of Gazprom) in the hopes that Vyakhirev would decide that Gazprom would not act as a 30% guarantor of NRB's registered capital, nor did they ever plan to do so. The brothers never had any communications of any kind about NRB with Vyakhirev. Mr. Chandler and his brother do not have the "protection" of any Gazprom officials or Gazprom board members. They have never made any payments to any former Gazprom officials, either to "secret accounts" created by Sovereign Forex or otherwise. The Chandlers never acquired \$47.5 million worth of Gazprom shares for Total/Fina/Elf, nor did they receive \$1.2 million for handling such acquisition. They never bought \$25 million worth of Gazprom shares for the Bank Credit Agricole Swiss, nor did they receive \$750,000 for such efforts.

- (j) ***Russian espionage.*** Mr. Chandler and his brother have never been spies or engaged in espionage for any country, let alone Russia. They have never participated in dead drops. Mr. Chandler's brother was never awarded a Russian order "For Service to the Fatherland" or otherwise.

83. Berlin and ICI acted with actual malice in publishing the libelous statements in the

Additional Pages. Evidence of their actual malice includes the following:

- From the beginning, Berlin knew he did not have the Swiss or Russian human intelligence sources or other sources and expertise required to provide an accurate background report on the Chandler brothers, so he set out to prepare fictitious reports about them.
- Berlin intentionally invented salacious accusations about the Chandlers in the fake reports, in order to justify the tens of thousands of dollars he had received for the fake reports.
- To this day, even after being informed that his false accusations have caused considerable harm to Mr. Chandler's reputation, Berlin has refused to repudiate the fake reports and set the record straight.
- On information and belief, discovery of testimony, communications, and documents relating to the financing, research, drafting, and editing of the fake reports will reveal substantial additional evidence of Berlin's actual malice.
- At all relevant times, Berlin was acting as an agent of ICI, and his actions and evidence

of his actual malice is therefore attributable to ICI.

84. Defendants made the libelous statements intentionally, willfully, maliciously, and in conscious disregard of Mr. Chandler's rights and reputation and of the truth.

85. Defendants had no applicable privilege or legal authorization to publish these false and libelous statements.

86. In addition to injuries presumed by law, these libelous falsehoods have injured—and will continue to injure—Mr. Chandler in at least the following ways:

- (k) By accusing Mr. Chandler of serious crimes;
- (l) By impugning Mr. Chandler's reputation;
- (m) By ascribing to Mr. Chandler conduct that would adversely affect his fitness for proper conduct as a businessman; and
- (n) By causing Mr. Chandler damages in other ways yet to be determined.

87. Defendants are liable to Mr. Chandler for compensatory damages arising out of their defamation of Mr. Chandler.

88. Defendants are also liable to Mr. Chandler for punitive damages because of the wanton and outrageous nature of their conduct.

PRAYER FOR RELIEF

WHEREFORE, Mr. Chandler respectfully requests that the Court enter an award and judgment in his favor, and against all Defendants jointly and severally, as follows:

- (o) awarding Mr. Chandler compensatory damages of not less than \$10,000,000.00;
- (p) awarding Mr. Chandler punitive damages of not less than \$5,000,000.00;
- (q) awarding Mr. Chandler all expenses and costs, including attorneys' fees; and
- (r) such other and further relief as the Court deems appropriate.

JURY DEMAND

Mr. Chandler demands a trial by jury on all claims and issues so triable.

Date: September 14, 2018

/s/ Thomas A. Clare, P.C

Thomas A. Clare, P.C. (D.C. Bar No. 461964)

Megan L. Meier (D.C. Bar No. 985553)

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