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Procureur Général d'Etat (Attorney General)  
Palais de Justice  
P.O. Box 15  
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Luxembourg March 4 2011

**Att** : The Director General of Public Prosecution / Attorney General  
**Re** : **Criminal complaint** – illegal covert surveillance  
**Case #** : Invasion of privacy – Covert surveillance  
**Your reference** :  
**Our reference** :  
**Posting by** : Mail and fax  
**Your fax #** : 47 59 81 421  
**Numbers of pages** : 2  
**Attachment** :  
**Copy** : Ombudsman; Commissioner V. Reding; ECJ; Eurojust; OLAF

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On August 30 2010 we filed a criminal complaint against the construction firm, Cardoso & Fils for having committed illegal covert surveillance against us. The subsequent weeks we registered a significant increase of illegal surveillance activity around our house, so on September 17 2010 we filed a second criminal complaint on illegal covert surveillance, harassment and invasion of privacy. Early in November 2010 we got reliable indications that Luxembourg authorities had increased its monitoring of our phone and fax lines, and we thus notified the police by a third criminal complaint.

The police and the public prosecutor have thwarted the investigation and even concealed the existence of these complaints.

Subsequent to the exposure of Cardoso & Fils carrying out illegal covert surveillance on us, the police force started fabricating a cover-up story which was intended to explain Cardoso & Fils' illegal activity. In this the police (or someone above) instructed Cardoso & Fils to harass us and pay us visits along with stories that could explain why they had "mixed" us up with the neighbouring 655 rue de Neudorf which was under renovation.

As this didn't work out properly, the police seems to have contacted the owner of 655 rue de Neudorf, Danske Bank International S.A.'s auditor, Deloitte S.A., and conspired with Deloitte to fabricate evidence that could free Cardoso & Fils from allegations on illegal covert surveillance, namely by deliberately providing subcontractors and – after the renovation was finished – a number of delivery companies with the wrong address, i.e. 665, rue de Neudorf (our address). For several months we have thus – on a weekly basis – been harassed by this activity, staged by the police and Deloitte.

On February 16 2010 ASA Batiments started the renovation of 655 rue de Neudorf. Within August 30 2010 (the date of our first criminal complaint in this matter) not one single contractor or subcontractor had knocked on our door, i.e. mistaken our house for the one at 655. At that point more than 75 % of the renovation was finished.

Deloitte acquired the property at 655 rue de Neudorf in June 2008 and named it "Villa Deloitte". It is thus unlikely or close to impossible that Deloitte more than two years later

all of a sudden and then over and over again should enter into contracts with third parties furnishing these parties with a wrong address on their "Villa Deloitte". The fact that subcontractors and delivery companies – immediately after we had filed the said criminal complaint – started to mistake our house for being the one at 655, strongly indicates that this is a result of a plot. We have seen the delivery orders of which Deloitte has furnished the delivery companies with, and the delivery address has in all cases been 665 rue de Neudorf, not their own address which is, as mentioned, 655. Even after we had informed the companies about the correct address for "Villa Deloitte", the problem didn't stop. This indicates that Deloitte S.A. – for some reason or other - *wanted* this to continue.

Although the police by this highly unprofessional but nevertheless foreseeable plot attempted to make it look like Cardoso & Fils' strange and irregular activity around our house during the summer of 2010 – taking pictures of us and keeping us under surveillance – was explainable<sup>1</sup> and a pure coincidence proven by the number of companies of which later on had mistaken our house with "Villa Deloitte", we can prove that this was a fabricated plot. Taped conversations with a number of drivers, who attempted to deliver their goods with us, showing us their orders where Deloitte explicitly has made these using our address as the service address, affirms this allegation.

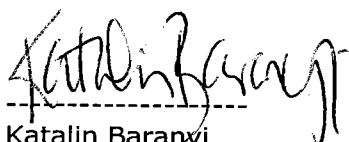
Deloitte has an obvious motive in assisting the police in this plot, as this audit firm has been auditing and thus approving the Danske Bank's national and international criminal activity for years. As the bank has to answer to more than 20 criminal complaints and a €53 million lawsuit, Deloitte S.A. will automatically be considered as accessory to the crimes and thus liable for any direct loss due to the said criminal activity.

Furthermore we are also experiencing that our mail is being opened. Solid envelopes containing all from private client information to birthday presents have been opened, checked and damaged, while other mail dispatches has been delayed by weeks or never reached us at all. This new information about the monitoring of our mail confirms that we are under constant illegal surveillance.

Our problem is that the police so far have attempted to cover up illegal activities and protect the perpetrators from facing criminal charges instead of investigating our complaints, and we expect nothing less from the police this time either, which is the reason why this letter is sent to a number of EU-institutions and others for further actions.

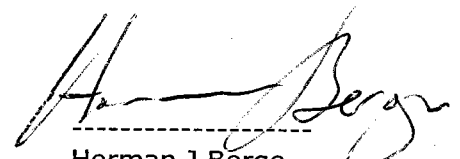
By this we nevertheless petition the Public Prosecutor, the Prime Minister and the Grand Duke to – individually – call for a meeting with the intention of sorting out this intolerable and highly illegal situation Luxembourg authorities are exposing us to.

We would appreciate your response within March 8 2011.



Katalin Baranyi  
PhD Scholar

Luxembourg March 4 2011



Herman J Berge  
LLB

<sup>1</sup> In a taped phone conversation on September 1 2010 the police wilfully misled us to believe that Cardoso & Fils had been contracted to give "Villa Deloitte" a new façade and that this was the reason why Cardoso & Fils had taken pictures of us in our living room, as they had mistaken our house for being 655. This explanation – which is a crime as it was given to cover up for Cardoso & Fils' illegal covert surveillance and in turn make us withdraw our criminal complaint – does obviously not hold water as the façade of "Villa Deloitte" at that point was more or less completed. Then again Cardoso & Fils has never been assigned any contracts at "Villa Deloitte".