ROBERT J. SPITZ (BAR NO. 067643) 1 SEPERIOR COURT OF CALIFORN COUNTY OF SALIBERIA SERVI LAW OFFICE OF ROBERT J. SPITZ 2 204 North San Antonio Avenue Ontario, California 91762 Telephone: (909) 395-0909 3 AU6 2 5 2019 Facsimile: (909) 395-9535 4 Attorney for Plaintiffs, BENJAMIN SERYANI and 5 SYNERGY SELECT ONE, LLC 6 SUPERIOR COURT OF THE STATE OF CALIFORNIA 8 9 COUNTY OF SAN BERNARDINO 10 11 CASE NO. BENJAMIN SERYANI A/K/A BENJAMIN SEMAAN SIRYANI an Individual, and SYNERGY 12 SELECT ONE, LLC, an Indiana Limited Liability Corporation doing business in California, VERIFIED COMPLAINT FOR: 13 Plaintiffs. 1. FRAUD 14 The Holy See A/K/A Vatican City State (HS/VCS) BREACH OF CONTRACT 15 2. A/K/A Vatican Nation American University of Madaba Inc.; 3. BREACH OF CONTRACT 16 American University of Madaba Company; BREACH OF CONTRACT American University of Madaba Campus, Board of 4. 17 Trustees: 18 Latin Patriarchate of Jerusalem; 5. **BREACH OF CONTRACT** Latin Patriarchal Vicariate Ecclesiastical Court; 19 Vatican Foundation St. John the Baptist; 6. CONVERSION Mukawer Castle For Education Company; Honorable Judge Fr. Dr. Majdi Siryani, a California 7. UNJUST ENRICHMENT 20 resident; **QUANTUM MERUIT** 21 His Beatitude Fouad Al-Twal; His Excellency Archbishop Pierbattista Pizzaballa; 8. MONEY HAD AND His Excellency Archbishop Bishara Maroun Lahham; 22 RECEIVED His Excellency Archbishop William Shomali; 23 His Excellency Archbishop Antonio Franco; 9. **OPEN BOOK ACCOUNT** Cardinal Secretary of State His Eminence Pietro Parolin; and DOES 1 through 200, inclusive, 24 DEMAND FOR JURY TRIAL Defendants. 25 26