

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ALKIVIADES DAVID; FILMON TV LTD.;
FILMON TV INC.; ALKI DAVID
PRODUCTION INC.

Plaintiff(s)

-v-

THOMAS GIRARDI, ESQ; GLORIA
ALLRED, ESQ.; NATHAN GOLDBERG,
ESQ.; RENEE MOCHKATEL ESQ.;
DOLORES Y. LEAL ESQ.; LEAH WILSON;
GAVIN NEWSOM; ALLRED, MAROKO &
GOLDBERG; THE STATE BAR OF
CALIFORNIA; ELIZABETH TAYLOR
MAHIM KHAN; CHASITY JONES; LAUREN
REEVES; COMCAST INC.; COMCAST
VENTURES, LLC;.

Defendant(s)

**CIVIL RACKETEERING AND
ANTITRUST COMPLAINT**

JURY TRIAL DEMAND

*“A lie doesn't become truth, wrong doesn't become right, and evil
doesn't become good, just because it's accepted by a majority.”*

Booker T. Washington

JURISDICTION

Jurisdiction in this case is invoked onto the Court pursuant to provisions of 18 U.S.C. §1961; 18 U.S.C. §1962; U.S.C. § 1964 et,seq of the civil RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT (RICO); and Article III, Section 2, to the Constitution of the United States 28 U.S.C. § 1331. Diversity jurisdiction pursuant to 28 U.S.C. § 1332(a) is invoked in that, the defendants are residents from different states of the Union. For the purpose of

1 Antitrust jurisdiction, provisions are invoked pursuant to TEXAS BUSINESS AND COMMERCE
2 CODE, Title 2, Chapter 15.05 et, seq., and applicable provisions of the CLAYTON ACT pursuant
3 to 15 U.S.C. § 15(a).
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5 VENUE

6 Venue is proper within this Court pursuant to 28 U.S.C. § 1391(b)(2) and (c)1, in that, a
7 plaintiff is domiciled in the state of Texas; and plaintiffs FILMON TV LTD.; FILMON TV INC.,
8 and ALKI DAVID PRODUCTION INC., are business entities which conducts commercial
9 business activities thru DISH NETWORK across the United States to include the state of Texas
10 and the Northern District of Texas. Further, a substantial part of the events giving rise to the claim
11 occurred in the Northern District of Texas. Venue is also invoked pursuant to 18 U.S.C. § 1965(a).
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14 ABOUT THE PARTIES

15 Plaintiff ALKIVIADES DAVID, known from hereinafter as DAVID, is a natural person,
16 a resident of Texas and a citizen of the United Kingdom. DAVID domiciles in the state of Texas.
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18 Plaintiff FILMON TV LTD., known from hereinafter as FILMON LTD, is a United
19 Kingdom company doing business in the United States to include the state of Texas and
20 internationally.
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22 Plaintiff FILMON TV INC., known from hereinafter as FILMON INC is a Delaware
23 corporation, doing business internationally.

24 Plaintiff ALKI DAVID PRODUCTIONS INC., known from hereinafter as ALKI DAVID
25 PRODUCTIONS INC., is a Delaware corporation doing business internationally.
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1 Defendant THOMAS GIRARDI, known from hereinafter as GIRARDI, is a natural person
2 and a resident of the State of California. Girardi is the sole equity partner of the GIRARDI -KEESE
3 Law Firm.

4 Defendant GLORIA ALLRED, known from hereinafter as ALLRED, is a natural person
5 and a resident of the State of California. Allred is a partner in Allred, Maroko & Goldberg.

6 Defendant NATHAN GOLDBERG, known from hereinafter as GOLDBERG, is a natural
7 person and a resident of the State of California. Goldberg is a partner in Allred, Maroko &
8 Goldberg.

9 Defendant DOLORES Y. LEAL, known from hereinafter as LEAL, is a natural person and
10 a resident of the State of California. Leal is a partner in Allred, Maroko & Goldberg.

11 Defendant RENEE MOCHKATEL, known from hereinafter as MOCHKATEL, is a
12 natural person and a resident of the State of California. MOCHKATEL, is a partner in Allred,
13 Maroko & Goldberg.

14 Defendant ALLRED, MAROKO & GOLDBERG, known from hereinafter as AMG, is a
15 California Law Firm by Partnership.

16 Defendant ELIZABETH TAYLOR, known from hereinafter as TAYLOR, is a natural
17 person and a resident of the State of California.

18 Defendant MAHIM KHAN, known from hereinafter as KHAN, is a natural person and a
19 resident of the State of California.

20 Defendant CHASITY JONES, known from hereinafter as JONES, is a natural person and
21 a resident of the State of California.

1 Defendant LAUREN REEVES, known from hereinafter as REEVES, is a natural person
2 and a resident of the State of California.

3 Defendant LEAH WILSON is a natural person and a resident and a citizen of California.
4 WILSON is the Executive Director of the California State Bar. WILSON is responsible for
5 properly and efficiently investigating all complaints made against attorneys. The executive director
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7 Defendant GAVIN NEWSOM is a natural person, a resident of the State of California.
8 NEWSOM is the Governor of the State of California who appointed four of the six members of
9 the Board of Directors of the State Bar of California under direction or influence of GIRARDI.
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12 **THE RICO ENTERPRISE COMMON PURPOSE**

13 For decades corrupt California based attorneys to include but not limited to: THOMAS
14 GARARDI; GLORIA ALLRED; LISA BLOOM; NATHAN GOLDBERG; RENEE
15 MOCHKATEL; and DOLORES Y. LEAL, have developed and operated a racketeering Enterprise
16 in what is estimated by federal prosecutors to exceed \$100 million USD, by sophisticated schemes.
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18 The common purpose of the Enterprise in the instant scheme was to embezzle and or
19 defraud for the purpose of acquiring illicit money from represented clients, wealthy persons,
20 corporations (both domestic and international), celebrities, and business executives through a
21 pattern of civil litigations facilitated by knowingly false (sexually related) allegations.
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23 In furtherance of the scheme to defraud, the Enterprise, through bribes and or industry
24 favors (to include judicial and political favors or support), acquired lucrative court induced
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1 monetary judgments, awards and or concealment, whereas the Enterprise's course of conduct
2 functioned as a continuing unit.

3 The Enterprise's course of conduct further elicited the aid and assistance of non-attorney
4 co-participants for the common purpose of the scheme to defraud, to include but not limited to:
5 ELIZABETH TAYLOR; MAHIM KHAN; LAUREN REEVES; CHASITY JONES; LISA
6 BLOOM; GAVIN NEWSOM; LEAH WILSON; and the STATE BAR OF CALIFORNIA.
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9 **RICO PREDICATES UNDER 18 U.S.C. § 1961**

10 The first predicated acts of racketeering for purposes of this lawsuit is established under
11 the provisions of the federal BRIBERY statute as set out in 18 U.S.C. § 201(c)(2)(3).¹ In that, on
12 or about February 21, 2021, THOMAS GARARDI, while acting together with others for a
13 common purpose of engaging in a course of racketeering activities and in furtherance of a scheme
14 to defraud, attempted to bribe attorney JAY EDELSON, so as to conceal one of the Enterprise's
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20 ¹ 18 U.S.C. 21(c)(2)(3) – Who ever
(2)

21 directly or indirectly, gives, offers, or promises anything of value to any person, for or because of the testimony under
22 oath or affirmation given or to be given by such person as a witness upon a trial, hearing, **or other proceeding**, before
23 any court, any committee of either House or both Houses of Congress, or any agency, commission, or officer
24 authorized by the laws of the United States to hear evidence or take testimony, or for or because of such person's
25 absence therefrom;

26 (3)
27 directly or indirectly, demands, seeks, receives, accepts, or agrees to receive or accept anything of value personally
28 for or because of the testimony under oath or affirmation given or to be given by such person as a witness upon any
such trial, hearing, **or other proceeding**, or for or because of such person's absence therefrom.
shall be fined under this title or imprisoned for not more than two years, or both. (Emp added)

1 many schemes and obstruct the course of justice in a federal civil proceeding, and more specifically
2 the proceeding as reported by public records in the related federal civil case *Edelson v. Girardi*,
3 1:20-cv-07115, United States District Court for the Northern District of Illinois.. *See* – (Exhibit 1)
4 Pg 9 ¶ 2, attached hereto and by this reference made a part hereof.

5
6 “Thomas Girardi openly boasted of his expansive web of control in Los Angeles
7 and tried to bribe the Edelson firm into making this case go away...”

8 The second predicated act of racketeering for purpose of this lawsuit is established under
9 the provisions of the federal WIRE FRAUD statute as set out in 18 U.S.C. 1343². In that, on or
10 about February 16, 2021, GIRARDI used one or more interstate telephone calls in furtherance of
11 the Enterprise’s scheme to defraud clients, wealthy persons, corporations (both domestic and
12 international), celebrities, and business executives to include Plaintiffs to the instant case. *See* -
13 evidentiary audio links provided herein: Hosted at [https://edelson.com/wp-](https://edelson.com/wp-content/uploads/Girardi_Voicemail_1.wav)
14 [content/uploads/Girardi_Voicemail_1.wav](https://edelson.com/wp-content/uploads/Girardi_Voicemail_1.wav) is a true and accurate copy of a voicemail left by
15 Thomas Girardi for Jay Edelson on February 16, 2021.

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17 Hosted at https://edelson.com/wp-content/uploads/Girardi_Voicemail_2.wav is a true and
18 accurate copy of a voicemail left by Thomas Girardi for Jay Edelson on February 16, 2021.
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23 ² 18 U.S.C. § 1343
24 Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property
25 by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means
26 of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures,
27 or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more
28 than 20 years, or both.

1 See also – (Audio recording of Thomas Girardi)
2 https://drive.google.com/file/d/1T0uOyacd5K4Dpo_I5Kg9jV7skX62WP1c/view?usp=sharing

3 “I want to be in charge of all of your shit...but at the end of about nine months
4 I want you to say, god darn you made me another million”

5 **THE RICO COURSE OF CONDUCT**

6 The racketeering scheme or otherwise course of conduct as prosecuted in this cause
7 comprises of both known and unknown participants but was formulated and orchestrated by the
8 parties named above as RICO defendants to this lawsuit.

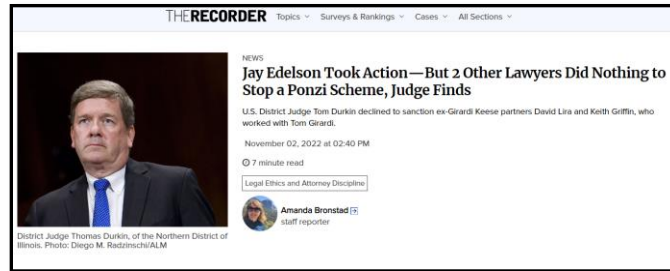
9 One of the many schemes³ but in particular, the instant scheme to defraud, involves the
10 GIRARDI – KEESE Law Firm, and its conspiring and colluding with other California based
11 attorneys and a select group of non-attorney co-participants clients.

12 The non-attorney co-participants while acting as clients of GIRARDI-KEESE or attorneys
13 engaged in the course of racketeering conduct in furtherance of the scheme to defraud, made false
14 allegations in civil court proceedings (and usually of a sexual nature) against wealthy persons,
15 corporations (both domestic and international), celebrities and business executives, to include but
16 not limited to Plaintiffs to the instant case.

17 The uses of emails, telephone communications and electronic court filings to include but
18 not limited to, the Superior Court of Los Angeles County, Cases BC654017 *Kahn v. Hologram*
19 *USA*, BC643099 *Reeves v. Hologram USA*, BC649025 *Jones v. David*, BC649025 *Taylor v. David*.

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26 ³ See - <https://www.okeefellc.com/girardi-ponzi-scheme/>

1 <https://abovethelaw.com/2022/08/pushing-private-judging-out-of-the-shadows/> See also
2 [https://www.law.com/therecorder/2022/11/02/jay-edelson-took-action-but-2-other-lawyers-did-](https://www.law.com/therecorder/2022/11/02/jay-edelson-took-action-but-2-other-lawyers-did-nothing-to-stop-a-ponzi-scheme-judge-finds/#:~:text=The%20judge%20turned%20to%20bar,rest%20of%20the%20plaintiff's%20bar.)
3 [nothing-to-stop-a-ponzi-scheme-judge-](https://www.law.com/therecorder/2022/11/02/jay-edelson-took-action-but-2-other-lawyers-did-nothing-to-stop-a-ponzi-scheme-judge-finds/#:~:text=The%20judge%20turned%20to%20bar,rest%20of%20the%20plaintiff's%20bar.)
4 [finds/#:~:text=The%20judge%20turned%20to%20bar,rest%20of%20the%20plaintiff's%20bar.](https://www.law.com/therecorder/2022/11/02/jay-edelson-took-action-but-2-other-lawyers-did-nothing-to-stop-a-ponzi-scheme-judge-finds/#:~:text=The%20judge%20turned%20to%20bar,rest%20of%20the%20plaintiff's%20bar.)



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“First, he unambiguously finds that Girardi was running a Ponzi scheme,” Edelson wrote. “Given that Girardi and his firm got away with this *for decades*, it is remarkable that this is the first time we have seen this finding in such a clear and unambiguous way. Second, he leaves little doubt about his views about what others at the firm knew about the illegal scheme.” (Emp added)

Defendant REEVES is a non-attorney co-participant client to the GIRARDI-KEESE Law Firm, and acted together, with the GIRARDI-KEESE Law Firm for a common purpose to defraud and to benefit from proceeds derived from racketeering activities to include federal wire fraud. Under Texas law participants in a RICO enterprise are jointly and severally liable for the acts of any member of the enterprise. *See, e.g., United States v. Edwards*, 303 F.3d 606, 643 (5th Cir. 2002)

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1 Defendant TAYLOR acted in a course of conduct with the GIRARDI-KEESE Law Firm
2 to acquire one or more fraud induced civil lawsuit awards in the aggregate amount of
3 \$11,000,000.00 against the plaintiffs.

4 Defendant KHAN acted in a course of conduct with the GIRARDI-KEESE Law Firm to
5 acquire one or more fraud induced civil lawsuit awards in the aggregate amount of \$58,250,000.00
6 against the plaintiffs.

7 Defendant JONES acted in a course of conduct with the GIRARDI-KEESE Law Firm to
8 acquire one or more fraud induced civil lawsuit awards in the aggregate amount of \$11,000,000.00
9 against the plaintiffs.

10 Defendant REEVES acted in a course of conduct with the GIRARDI-KEESE Law Firm to
11 acquire one or more fraud induced civil lawsuit awards in the aggregate amount of \$4,795,000.00
12 against the plaintiffs.

13 Defendant WILSON acted in a course of conduct with the GIRARDI-KEESE Law Firm,
14 to conceal and or coverup complaints of corruption involving GIRARDI and or the attorneys
15 associated with the GIRARDI-KEESE Enterprise for the common purpose of continuing the
16 conduct of the Enterprise. *See* - (Exhibits 4 and 5) attached hereto and by this reference made a
17 part hereof.

18 Defendant KHAN and REEVES acting under the direction and or influenced of ALLRED,
19 GOLDBERG, LEAL, MOCHKATEL, AMG, and other parties within the Enterprise and under a
20 course of conduct for the common purpose to defraud, performed as non-attorney co-participant
21 clients against DAVID; FILMON LTD.; FILMON INC., and ALKI DAVID PRODUCTION INC.

1 KHAN and REEVES, at all times relevant was aware that her civil court claims against
2 DAVID; FILMON LTD.; FILMON INC., were false and predicated upon a fraudulent scheme
3 advanced by ALLRED, GOLDBERG, LEAL, MOCHKATEL, and AMG.
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5 Defendant JONES was recruited by TAYLOR under the direction and influenced of
6 ALLRED and BLOOM, and other parties within the Enterprise to act under a course of conduct
7 for the common purpose to defraud, that is both TAYLOR and JONES performed as non-attorney
8 co-participant clients against DAVID; FILMON LTD.; FILMON INC., and ALKI DAVID
9 PRODUCTION INC.
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11 TAYLOR and JONES, at all times relevant was aware that her civil court claims against
12 DAVID; FILMON LTD.; FILMON INC., were false and predicated upon a fraudulent scheme
13 advanced by BLOOM and ALLRED.
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15 **THE RICO ENTERPRISE**

16 The racketeering enterprise of GIRARDI-KEESE, are “*associates in fact*”, and formed as
17 a group of persons informally associated together for a common purpose of engaging in a course
18 of conduct as a continuing unit to defraud.
19

20 The unit known from hereinafter as the GIRARDI-KEESE Enterprise, acted in concert
21 with the above named defendants and others in furtherance of a scheme to victimize by defrauding
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1 wealthy persons, corporations (both domestic and international⁵), celebrities, and business
2 executives, to include Plaintiffs to the instant case.

3 Defendant TAYLOR acted as one of several recruiters as well as a non-attorney co-
4 participant client in one or more civil litigation schemes involving the GIRARDI-KEESE
5 Enterprise. See- [https://www.globenewswire.com/en/news-](https://www.globenewswire.com/en/news-release/2019/10/28/1936614/0/en/Alki-David-to-Rep-Self-in-Allred-Goldberg-s-Latest-Fake-MeToo-Trial.html)

7 [release/2019/10/28/1936614/0/en/Alki-David-to-Rep-Self-in-Allred-Goldberg-s-Latest-Fake-](https://www.globenewswire.com/en/news-release/2019/10/28/1936614/0/en/Alki-David-to-Rep-Self-in-Allred-Goldberg-s-Latest-Fake-MeToo-Trial.html)
8 [MeToo-Trial.html](https://www.globenewswire.com/en/news-release/2019/10/28/1936614/0/en/Alki-David-to-Rep-Self-in-Allred-Goldberg-s-Latest-Fake-MeToo-Trial.html)

9 Other persons engaged in the GIRARDI-KEESE Enterprise, and acted in concert with
10 TAYLOR, KHAN, REEVES, and JONES, were ALLRED, GOLDBERG, MOCHKATEL,
11 ALLRED, MAROKO & GOLDBERG (AMG), LISA BLOOM known from hereinafter as
12 BLOOM. BLOOM at all times relevant was an attorney at AMG. BLOOM is the daughter of
13 ALLRED. LEAH WILSON (WILSON) served at all times relevant as the Executive Director of
14 THE STATE BAR OF CALIFORNIA (THE BAR) is a California state Public Corporation.
15 GAVIN NEWSOM (NEWSOM) is the Governor of the State of California who appointed four of
16 the six members of the Board of Directors of THE BAR, and politically benefited from schemes
17 to defraud by the defendants; See - [https://www.foxnews.com/politics/gavin-newsom-ties-tom-](https://www.foxnews.com/politics/gavin-newsom-ties-tom-girardi-lawsuit)
18 [girardi-lawsuit,](https://www.foxnews.com/politics/gavin-newsom-ties-tom-girardi-lawsuit)
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25 ⁵ See – (Exhibit 3) attached hereto and by this reference made a part hereof.



“In effect, they deferred to Girardi, who had a reputation as a titan of the plaintiffs’ bar in California and throughout the country.” --- “Indeed, Girardi’s gaudy displays of wealth and extravagant lifestyle furthered the fiction that he and his firm were successful and solvent.”

*United States District Judge Tom Durkin
Nov 2, 2022 / The Recorder*

COMCAST INC. (formerly known as American Cable Systems and Comcast Holdings) is headquartered in Philadelphia, PA. COMCAST INC., is the largest of America’s multinational telecommunications platforms for broadcasting and cable television.,

COMCAST VENTURES, LLC., is a venture capital firm headquartered in San Francisco, California and a subsidiary of COMCAST INC. Both COMCAST INC., and COMCAST VENTURES, are associated together with the GIRARDI-KEESE Enterprise for a common purpose of engaging in a course of racketeering conduct. NBC News, CNBC, and MSNBC are owned by COMCAST INC., which also owns UNIVERSAL PICTURES and is a minority partner to five Chinese state-owned companies.

COMCAST INC., and COMCAST VENTURES, through their control of major media networks and outlets, engaged in a course of conduct to further conceal the fraudulent activities of the GIRARDI-KEESE Enterprise. In that, COMCAST INC., and COMCAST VENTURES

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1 censored DAVID or caused DAVID to be censored for the common purpose of continuing the
2 long-term operation of the GIRARDI-KEESE Enterprise.
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5 **THE ANTITRUST VIOLATION AND TORTUROUS INTERFERENCE**

6 FILMON LTD., is a United Kingdom based company that delivers conservative streaming
7 media broadcast by way of the internet. FILMON LTD., often covers conservative political
8 viewpoints and news matters that involves corruption in government.

9 COMCAST INC., and COMCAST LLC., censored FILMON LTD., or caused its
10 censoring to conceal and or prevent FILMON LTD., from exposing early on the corrupt and
11 racketeering conduct of the GIRARDI-KEESE Enterprise.
12

13 The censoring of FILMON LTD., by COMCAST INC., and COMCAST LLC., lessened
14 competition with their telecommunications brands by injury, destruction, and or preventative
15 competition to FILMON LTD., and its customer base market in the state of Texas.⁶
16

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18 **FACTUAL ALLEGATIONS**

19 Girardi was once a top plaintiffs' attorney and Democratic powerbroker who gained reality
20 TV fame on "Real Housewives of Beverly Hills" alongside his third wife, Erika. His downfall in
21 December 2020 was in part triggered by a federal judge finding that he had misappropriated
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25 ⁶ Sec. 15.05. UNLAWFUL PRACTICES. (a) Every contract, combination, or conspiracy in restraint of trade or
26 commerce is unlawful.

1 millions from families of those killed in an Indonesian plane crash. But after the collapse of his
2 Wilshire Boulevard law firm, scores of clients came forward saying they were swindled by Girardi
3 and The Los Angeles Times documented a trail of misconduct and allegations going back decades.
4
5 *See* – (Exhibit 6) attached hereto and by this reference made a part hereof.

6 The Chicago based Edelson law firm accused Girardi and other lawyers at his defunct firm
7 of running “*the largest criminal racketeering enterprise in the history of plaintiffs’ law,*”
8 pocketing millions from clients, vendors and fellow attorneys.

9 On December 07, 2016, REEVES, represented by ALLRED, sued DAVID (who domiciles
10 in the state of Texas), Hologram USA, FILMON LTD (which conducts business in and through
11 the state of Texas), and ALKI DAVID PRODUCTIONS, in state court and more specifically Los
12 Angeles Superior Court, Case No. BC643099. The case involved fraudulent civil litigation
13 premised on allegations of sexual battery and or sexual harassment which was engaged in by the
14 GIRARDI-KEESE Enterprise and REEVES.
15

16 Defendant ALLRED’s partners, GOLDBERG, LEAL, MOCHKATEL and AMG
17 represented REEVES, who worked as a comedy writer for FILMON LTD.
18

19 On April 15, 2020, a civil judgment for REEVES was entered against the corporate
20 defendants' Hologram USA, Inc., ALKI DAVID PRODUCTIONS, INC., and FILMON LTD in
21 the amount of \$650,000 for compensatory damages. REEVES later agreed to a reduction in her
22 compensatory award in the amount of \$445,000. REEVES, at all times relevant was aware that her
23 civil lawsuit and the claims made against the Plaintiffs were predicated upon knowingly false
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1 allegations and fraud. A punitive damages award in the amount of \$4.35 million was entered
2 against DAVID for the aggregate sum of \$4,795,000.00.

3 . The fraud induced award and judgment against Hologram USA, Inc., ALKI DAVID
4 PRODUCTIONS, INC., and FILMON LTD restrained commerce and the plaintiff's ability to
5 conduct trade and or business in the state of Texas.
6

7 Defendant DAVID had four times sought to have THE BAR address his legitimate claims
8 concerning the egregious and unethical conduct of ALLRED and her partners. DAVID's
9 correspondence with WILSON, who served during all times relevant as the Executive Director of
10 THE BAR. THE BAR ignored three prior complaints that DAVID had sent to THE BAR where
11 the Complaints never lead to an investigation into the unethical conduct of ALLRED or GIRARDI.
12 *See* – (Exhibit 6) attached hereto and by this reference made a part hereof.
13

14 On April 29, 2020, Attorney Murray B. Greenberg, Esq. wrote THE BAR regarding
15 DAVIDs' submitted complaints. Attorney Greenberg wrote on behalf of DAVID against attorneys
16 ALLRED, GOLDBERG, LEAL and MOCHKATEL based on their professional misconduct in the
17 case held before Judge Michelle Williams Court in Los Angeles Superior Court, Central District
18 Case No. BC654017 entitled MAHIM KHAN, Plaintiff v. HOLOGRAM USA, Inc; ALKI DAVID
19 PRODUCTIONS, INC.; FILMON TV, INC. *See-* (Exhibit 7) attached hereto and by this reference
20 made a part hereof.
21

22 DAVID sent WILSON, an email concerning THE BAR's entire failure to address the
23 merits of any of his three prior complaints. DAVID did so after it was revealed that THE BAR had
24 failed to investigate attorney misconduct. WILSON, who apparently had not even read the
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1 attachments sent to her by DAVID responded on June 25, 2022, asking “*have you considered*
2 *filing a complaint against Ms. Allred or Ms. Bloom?*” See – (Exhibit 4) attached hereto and by this
3 reference made a part hereof.

4
5 THE BAR while engaging in a course of conduct as a continuing enterprise unit, from at
6 least the year 2015 until present failed to investigate many complaints. The Press has widely
7 reported that THE BAR has failed to effectively discipline corrupt attorneys, allowing lawyers to
8 repeatedly violate professional standards, and harm members of the public, however COMCAST
9 INC., and CONCAST VENTURES, LLC, acted to censor or caused to be censored the matter
10 involving DAVID as a victim to the identical subject matter.

11
12 Recently, it has been revealed by the Press that GIRARDI was involved with securing
13 Judges to rule for a particular party in many cases. See
14 [https://www.latimes.com/california/story/2022-08-04/tom-girardi-erika-corruption-private-](https://www.latimes.com/california/story/2022-08-04/tom-girardi-erika-corruption-private-judges)
15 [judges](https://www.latimes.com/california/story/2022-08-04/tom-girardi-erika-corruption-private-judges). GIRARDI was the “Fixer” of cases for a certain network of attorneys as reported by
16 another attorney.

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18 On information and belief ALLRED is one of these attorneys for whom GIRARDI fixed
19 several cases including Los Angeles Superior Court cases No. BC654017 *Kahn v. Hologram USA*,
20 BC643099 *Reeves v. Hologram USA*, BC649025 *Jones v. David*, BC649025 *Taylor v. David*,
21 involving the parties of DAVID, Hologram USA, FILMON LTD, and ALKI DAVID
22 PRODUCTIONS.

1 This corruption was recently discovered and has been in the domestic and global news as
2 many articles are laying out the vast schemes involving the GIRARDI-KEESE Enterprise. The
3 matter is still being investigated and every day there is more corruption and scheme types exposed.

4
5 Defendant DAVID and his attorney at the time of being sued by REEVES complained to
6 the court, and to THE BAR about the unethical and criminal behavior of ALLRED and her partners.
7 More specifically, as set forth in the State Bar Complaint. *See* – (Exhibit 4) attached hereto and by
8 this reference made a part hereof.

9
10 Defendants ALLRED, GOLDBERG and their law firm partners in the REEVES litigation
11 and in inter-related cases, including Mahim Khan v. Hologram USA, Inc., Alki David Productions,
12 Inc., FilmOn TV, Inc., Alkiviades David, Case No. BC 654017, (KHAN) switched exhibit and
13 witness lists in those trials, and forged the signature of Ellyn Garofolo, who at that time was
14 counsel for DAVID, ALKI DAVID PRODUCTIONS, INC, and FILMON INC.

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16 *Kahn* was a highly contentious lawsuit which involved the Enterprises' status quo
17 allegations of battery and sexual harassment against wealthy persons, corporations (both domestic
18 and international), celebrities, and business executives to include DAVID, ALKI DAVID
19 PRODUCTIONS, INC, and FILMON INC.

20
21 The most egregious ethical breach involved the manipulation of a joint exhibit list by
22 KAHN's attorneys which caused a materially altered list to be filed with the court. As if this action
23 was not serious enough, KAHN's attorneys also removed the signature page of the DAVID's
24 attorney's (Ellyn S. Garofalo) and subsequently affixed it to a previously agreed upon version.
25 KAHN's attorneys then attached the forged signature to the fraudulent version after discovery that

1 attorney Garofalo was unavailable. GOLDBERG then signed the exhibit list and filed it with the
2 court.

3 The act was done without the knowledge, permission or authorization of Ms. Garofalo or
4 anyone else in her office. GOLDBERG performed this particular act in the course of conduct for
5 a common purpose of the Enterprise to acquire money through racketeering activities. A
6 comparison between the doctored document and the original agreed-upon version indicates that
7 one document was added, and three documents were deleted.

8
9 Defendants LEAL and MOCHKATEL were two other attorneys listed on the pleading as
10 well as ALLRED who is a partner of the law firm.

11
12 In addition to the above-referenced misconduct, the attorneys for KHAN sought to exclude
13 documents that were previously produced to her attorneys by indicating falsely to the court that
14 they were not disclosed or produced in discovery.

15
16
17 **THE TAYLOR, KHAN, JONES AND TAYLOR RICO CONSPIRACY**

18 In 2015 DAVID engage in a consensual relationship with MARY RIZZO known from
19 hereinafter as RIZZO. RIZZO who worked as an employee at DAVID's Hologram USA
20 company. At a later time during the acquaintance RIZZO employed the legal counsel of
21 ALLRED to bring forth a workplace related lawsuit against DAVID. The lawsuit was settled
22 under a strict Confidentiality Agreement for an undisclosed amount.

23
24 During this period TAYLOR and KHAN discovered the lawsuit involving RIZZO and
25 decided to engage in copycat conduct for the purpose of acquiring money from DAVID for

1 themselves. TAYLOR and KHAN's actions caused DAVID to threaten criminal charges as
2 reported by the May 7, 2016 telephone text communication between RIZZO and JONES. Text
3 messages that were associated with the lawsuits but denied relevance during all litigations.
4

5 JONES: *"He told me he was filing criminal charges against her."*

6 RIZZO: *"Damn. Poor Elizabeth. MK too?"*

7 JONES: *"No."*

8 RIZZO: *"You know what's crazy...I still have text from Elizabeth saying all she needs is
9 MK and you to talk."*

10 JONE: *"She asked me to help her case and kept calling me over and over via text but I'm
11 not sure if she told me to file against him or not bc I wasn't paying attention to
her."*

12 *****

"Yes I'm sure. Elizabeth prob said we all seen it or something. Who know

13 RIZZO: *"Yea she probably did. I never did tho."*
14

15 *****

16 JONES: *"I never seen him touch her but she always had something to say about everyone
17 lol*

18 RIZZO: *"OMG she did! Lol" – "She liked to gossip"*

19 JONES: *"Yep"*

20 RIZZO: *"Even about fake stuff"*

21 JONES: *"Lol yes"*
22

23 At a date uncertain but following the date of the Confidential Settlement Agreement,
24 ALLRED confided in TAYLOR the settlement amount that DAVID had made RIZZO.
25

1 TAYLOR subsequently announced the confidential settlement amount during an
2 employee related dinner at Cafe Roma in Beverly Hills, California where JONES, KHAN and
3 others were present. According to RIZZO news of the settlement amount inspired a plot by
4 TAYLOR, KHAN and JONES to extort DAVID, and that each would testify for each the other as
5 needed. The conspiracy between TAYLOR, KHAN, and JONES was not engaged in because of
6 any sexual related activities involving DAVID, but for reasons that each defendant was disgruntled
7 because of the amount of salaries and or commissions that each defendant was being paid under
8 DAVID's employ. In the text conversation between RIZZO and JONES, JONES on May 26, 2015
9 reveals as much:
10
11

12 JONES: *"I hate Filmon!!" – "I'm quitting for sure! They only paid me part of my*
13 *commission and Alki agreed to pay me and Peter don't want to pay. Alki said he*
14 *was going to make sure I get paid but this is not right I have to fight for my money."*

15 RIZZO: *"I can't believe that. That company is ridiculous. It's funny how everyone has*
16 *trouble getting paid there commissions but that never was a problem for Jill in the*
17 *UK. Makes you wonder."*

18 JONES: "

19 ***** NOVEMBER 16, 2015

20 JONES: *"I'm going to call the lawyer back. That what Alki get!!!!"*

21 RIZZO: *"Lol" --- "Yea I knew something was up when MK stopped showing up."*

22 JONES: *"I think I'm going to sue him too bc he deserves it by the way he treat people and*
23 *the things he do to people" --- "I'm going to call Elizabeth today this afternoon"*

24 *****
25

1 RIZZO: *"It's not just Elizabeth but MK and now you"*

2 JONES: *"Yes" --- "He's a loser!!!!"*

3
4 ***** NOVEMBER 17, 2015

5 JONES: *"I'm going to sue Alki for hassassment. I'm going to go home and find another*
6 *attorney today and go over all my notes I kept"--- "That whok company is dirty"---*
7 *- "They are trying to go public and that not fair how he does me and people" ---*
8 *"I'm going to call and retract my statement from Barry Rotyman too"*

9 ALLRED and BLOOM encouraged TAYLOR, KHAN, and JONES to engage others into
10 joining the Enterprise with a common purpose .

11 ALLRED wouldn't take TAYLORS' case unless TAYLOR recruited two more clients. The two
12 clients were KHAN and JONES.

13
14 ***** JUNE 2, 2015

15
16 TAYLOR: *"No one is willing to be a witness now and Gloria Allred won't take my case*
17 *if not. If the tables were turned I would have you girls back in a heartbeat. No*
18 *questions asked. This entire thing just sucks & all leads back to being scared of*
19 *Alki. Like we make 2,000 a month, it's a joke. I already had a final interview*
20 *today. Lol" --- "All I need is Chasity and MK" --- "MK to say he touched her*
21 *boobs (which she told me she would say)" --- "Chasity to say she was a witness to*
22 *the headstand thing"*

23 **THE RICO NEXUS TO TEXAS**

24 JONES was hired by DAVID as an employee of Hologram USA, until having been
25 terminated by the company for "faking sales contracts". Following the employment discharge of
26 JONES, BLOOM was retained to pursue fraudulent civil damages against DAVID and Hologram

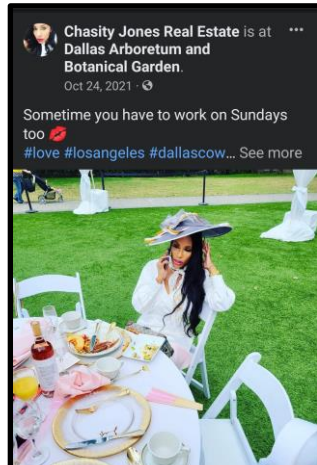
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1 USA for battery. JONES later recruited NICHOLS who is also a former employee of DAVID to
2 make similar civil allegations DAVID.. Both JONES and NICHOLS were represented by BLOOM.
3 Both JONES and NICHOLS at all times relevant were aware that their civil lawsuits and the claims
4 made against the relevant Plaintiffs were predicated upon knowingly false allegations and fraud.
5 NICHOLS has since recanted all allegations of misconduct against DAVID. Title 18 U.S.C.
6 1962(a) provides that “It shall be unlawful for any person who has received any income derived,
7 directly or indirectly, from a pattern of racketeering activity or through collection of an unlawful
8 debt in which such person has participated as a principal within the meaning of section 2, title 18,
9 United States Code, to use or invest, directly or indirectly, any part of such income, or the proceeds
10 of such income, in acquisition of any interest in, or the establishment or operation of,
11 any enterprise which is engaged in, or the activities of which affect, interstate or foreign commerce.
12
13

14 Defendant JONES has a residential nexus to the state of Texas and more specifically to the
15 north Texas Collin and Dallas counties area.

16 On October 24, 2021, JONES traveled from California to Texas affecting interstate
17 commerce where JONES used income derived either directly or indirectly at the Dallas Arboretum,
18 and that such income was derived from a pattern of racketeering activity from the GIRARDI-
19 KEESE Enterprise. 18 U.S.C. § 1965(a) provides that any civil action or proceeding under this
20 chapter against any person may be instituted in the district court of the United States for any
21 district in which such person resides, is found, has an agent, or transacts his affairs.
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On September 12, 2020, JONES traveled from California to Texas affecting interstate commerce where JONES handling her affairs, used income derived either directly or indirectly at the Marc Samuels Jewelry in Grapevine, Northern District of Texas, and that such income spent at Marc Samuels Jewelry was derived from a pattern of racketeering activity from the GIRARDI-KEESE Enterprise. See – the below image.

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Beginning in or about the year 2020, COMCAST INC., and COMCAST LLC., censored FILMON LTD., or caused its censoring to prevent FILMON LTD., from exposing early on the corrupt and racketeering conduct of the GIRARDI-KEESE Enterprise. The censoring of FILMON LTD., by COMCAST INC., and COMCAST LLC., lessened competition with their telecommunications brands by injury, destruction, and or preventative competition to FILMON LTD., and its customer base in the state of Texas.

**INJURY TO PLAINTIFFS IN THE
STATE OF TEXAS
ALKIVIADES DAVID; FILMON TV LTD.;
FILMON TV INC.; ALKI DAVID PRODUCTION INC.**

Plaintiffs are engaged in business contracts with Dallas, Texas based company “SWISSX” inasmuch that Plaintiff’s ability to conduct trade or business in, and from the state of Texas to include advertising have been highly affected by the course of conduct engaged in by the

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1 GIRARDI-KEESE Enterprise to include injury to Plaintiffs’ financial property and reputation as
2 set out in the above sections. The Texas Constitution provides: “All courts shall be open, and every
3 person for an injury done him, in his lands, goods, person or reputation, shall have remedy by due
4 course of law.” TEX. CONST. art. I, § 13.
5

6 Texas courts have personal jurisdiction over the California based nonresident GIRARDI-
7 KEESE Enterprise where the state’s long-arm statute permits such jurisdiction, and the exercise of
8 jurisdiction is consistent with federal and state due-process guarantees. *Moncrief Oil Int’l Inc. v.*
9 *OAO Gazprom*, 414 S.W.3d 142, 149 (Tex. 2013). The Texas long-arm statute broadly allows
10 courts to exercise personal jurisdiction over a nonresident who commits a tort in whole or in part
11 in this state. TEX. CIV. PRAC. & REM. CODE § 17.042(2). Because this statute reaches as far as
12 the federal constitutional requirements for due process will allow, “Texas courts may exercise
13 jurisdiction over a nonresident so long as doing so comports with federal due process limitations.”
14 *Am. Type Culture Collection, Inc. v. Coleman*, 83 S.W.3d 801, 806 (Tex. 2002). Consistent with
15 federal due process protections, a Texas state court can exercise jurisdiction over a nonresident
16 defendant only if (1) the defendant has established “minimum contacts” with the state and (2) the
17 exercise of jurisdiction comports with “traditional notions of fair play and substantial justice.” See
18 – *TV Azteca v. Ruiz*, No. 14-0186 Supreme Court of Texas (2015). The GIRGARDI-KEESE
19 Enterprise established minimum contact with the state of Texas on or about July 2, 2021, where
20 ALLRED engaged in a commercial book deal contract or agreement with Flower Mound, Texas,
21 resident Paxton Smith. The commercial book deal is by knowledge and belief proceeds from a
22 pattern of racketeering conduct affecting interstate commerce. Title 18 U.S.C. 1962(a) provides
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1 that “It shall be unlawful for any person who has received any income derived, directly or
2 indirectly, from a pattern of racketeering activity or through collection of an unlawful debt in
3 which such person has participated as a principal within the meaning of section 2, title 18,
4 United States Code, to use or invest, directly or indirectly, any part of such income, or the proceeds
5 of such income, in acquisition of any interest in, or the establishment or operation of,
6 any enterprise which is engaged in, or the activities of which affect, interstate or foreign commerce.
7 Moreover, RICO Defendants COMCAST, INC., and COMCAST VENTURES, LLC., likewise
8 are subject to the same prohibitions as ALLRED. In that for 59 years COMCAST, INC., had been
9 in business and owns NBC News, CNBC, and MSNBC, which provides telecommunication
10 activities affecting interstate commerce for the purpose of § 1962(a).
11
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14 **FIRST CLAIM FOR RELIEF**

15 *(Racketeering Influenced and Corrupt Organization 18 U.S.C. § 1961, 1964(c))*

16 **THOMAS GIRARDI; GLORIA ALLRED; NATHAN GOLDBERG; RENEE**
17 **MOCHKATEL; DOLORES Y. LEAL; LEAH WILSON; GAVIN NEWSOM; ALLRED,**
18 **MAROKO & GOLDBERG; THE STATE BAR OF CALIFORNIA; LAUREN REEVES;**
19 **ELIZABETH TAYLOR; MAHIM KHAN; CHASITY JONES; LAUREN REEVES;**
20 **COMCAST INC.; COMCAST VENTURES, LLC;**

21 Plaintiff incorporates by reference and realleges pages 1 through 26 set forth above and
22 Case No. BC643099 Los Angeles Superior Court – No. BC654017 *Kahn v. Hologram USA*,
23 BC643099 *Reeves v. Hologram USA*, BC649025 *Jones v. David*, BC649025 *Taylor v. David*.

24 Plaintiff claims that Defendants’ conduct under the common purpose to defraud, and the
25 conduct of each Defendant named above, constitutes racketeering as set forth in 18 U.S.C. §
26

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1 1964(c). Specifically, Congress has defined “racketeering” to include wire fraud, or committing
2 fraud by means of electronic transmissions over wire. The Defendants here engaged in multiple
3 instances of wire fraud, including fraudulent electronic state court filings by wire. The federal wire
4 fraud statute pursuant to 18 U.S.C. § 1343 makes it unlawful to devise any scheme or artifice to
5 defraud, or for obtaining money or property by means of false or fraudulent pretenses,
6 representations, or promises, and transmits or causes to be transmitted by means of wire, radio, or
7 television communication in interstate or foreign commerce, any writings, signs, signals, pictures,
8 or sounds for the purpose of executing such scheme. Defendants engaged in wire fraud by the use
9 of telephone communications and electronic state court filing of litigation papers, each paper filed
10 constituting a separate and distinct violation of the wire fraud statute. In summary, Section 1962(c)
11 provides relief against parties who engage in a pattern of racketeering activity, Section 1962(a)
12 provides relief against parties who use income generated through a pattern of racketeering activity,
13 and Section 1962(d) provides relief against those who conspire to violate the racketeering laws.
14 Defendants are liable under each of these three sections of the statute. Further, 18 U.S.C. § 1964(c)
15 allows “any person injured in his business or property by reason of a violation of section 1962 of
16 this chapter” to “sue therefor in any appropriate United States district court and shall recover
17 threefold the damages he sustains and the cost of the suit, including a reasonable attorney’s fee
18”
19
20
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22 **SECOND CLAIM FOR RELIEF**

23 *(Civil Conspiracy to Commit Fraud – Texas - (§ 15.02. Criminal Conspiracy))*

24 **THOMAS GIRARDI, ESQ; GLORIA ALLRED, ESQ.; NATHAN GOLDBERG, ESQ.;**
25 **RENEE MOCHKATEL ESQ.; DOLORES Y. LEAL ESQ.; LEAH WILSON; GAVIN**
26 **NEWSOM; ALLRED, MAROKO & GOLDBERG; THE STATE BAR OF**

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1 **CALIFORNIA; ELIZABETH TAYLOR; LAUREN REEVES; MAHIM KHAN;**
2 **CHASITY JONES; COMCAST INC.; COMCAST VENTURES, LLC;.**

3 Plaintiff incorporates by reference and realleges pages 1 through 26 set forth above. Under
4 Texas law “attorneys can be held liable for fraudulent conduct, such that attorney immunity does
5 not apply to fraud or conspiracy to defraud claims. *See Toles*, 113 S.W.3d at 912; *See also*
6 *Likover*, 696 S.W.2d at 472.” *Santiago v. Mackie Wolf Zientz & Mann, P.C.*, No. 05-13-00620-
7 CV, at *7 (Tex. App. Aug. 19, 2014)

8
9 At all times relevant, the Defendants agreed to and did conspire to willfully and maliciously
10 injure Plaintiffs in its property, reputation, trade, business or profession through the fraud
11 committed by the GIRARDI-KEESE Enterprise as described below.

12 Defendants, through the GIRARDI-KEESE Enterprise, have knowingly, willfully and
13 intentionally conspired and agreed to conduct and participate in the conduct and the affairs of the
14 GIRARDI-KEESE Enterprise as alleged in the preceding sections. Defendants, and each of
15 them, conspired to commit the frauds alleged herein, in that all Defendants conspired to
16 accomplish the Fraudulent Litigation Scheme as determined by the federal courts *supra*.
17 Defendants had a meeting of the minds to accomplish that goal through one or more unlawful
18 acts of fraud as alleged herein, and Plaintiffs suffered harm as a result of Defendants’ conduct
19 and conspiracy. As a direct and proximate consequence of the Defendants’ conspiracy, Plaintiffs
20 has been injured in its business and property, causing Plaintiffs to suffer monetary damages in an
21 amount not less than \$85,045,000.00 said damages to be proven at the time of trial. Because of
22 Defendants’ violations of 18 U.S.C. § 1964(c), Defendants are liable to Plaintiff for three times
23 the damages Plaintiff has sustained, plus the cost of this suit, including reasonable attorneys’ fees
24
25
26

1 and any injunctive relief the court deems reasonable. Defendants' conduct as alleged in in pages
2 1 through 26 and incorporated herein was done in furtherance of their informal association
3 together for a common purpose of engaging in a course of conduct as a continuing unit.
4 Accordingly, the Plaintiffs is entitled to an award of punitive damages from Defendants and each
5 of them in an amount to be proven at trial and sufficient to punish, penalize and deter Defendants
6 from engaging in such conduct in the future.
7

8
9
10 **THIRD CLAIM FOR RELIEF**
11 **(Antitrust CLAYTON ACT pursuant to TITLE 15 U.S.C. § 15(a))**
12 **TEXAS BUSINESS AND COMMERCE CODE, TITLE 2, CHAPTER 15.05**
13 **COMCAST INC.; COMCAST VENTURES, LLC;**

14 Title 15 U.S.C. § 15(a) provides that any person who shall be injured in his business or
15 property by reason of anything forbidden in the antitrust laws may sue therefor in any district court
16 of the United States in the district in which the defendant resides or is found or has an agent.
17 COMCAST, INC., has a registered agent in Texas:

18 CT CORPORATION SYSTEM
19 1999 Bryan St., Ste. 900,
20 Dallas, TX, 75201-3136, USA

21 Beginning in or about the year 2020 but to the present day, COMCAST INC., and
22 COMCAST LLC., censored FILMON LTD., or caused its censoring to prevent FILMON LTD.,
23 from exposing early on the corrupt and racketeering conduct of the GIRARDI-KEESE Enterprise.
24 The censoring of FILMON LTD., by COMCAST INC., and COMCAST LLC., lessened
25 competition with their telecommunications brands by injury, destruction, and or preventative
26 competition to FILMON LTD., and its customer base in the state of Texas.

1 **JURY DEMAND**, Pursuant to Fed. R. Civ. P. 38(b), Plaintiffs hereby demands a trial by jury of
2 all issues so triable that are raised herein or which hereinafter may be raised in this action.
3

4 **PRAYER FOR RELIEF WHEREFORE**, Plaintiffs prays for judgment against Defendants as
5 follows:
6

- 7 1. Finding that all defendants are jointly and severally liable for all damage caused to Plaintiffs;
- 8 2. Awarding Plaintiff monetary damages in an amount not less than \$85,045,000.00 said amount
9 to be proven at trial;
- 10 3. Awarding Plaintiffs enhanced (treble) monetary damages pursuant to 18 U.S.C. § 1964(c);
- 11 4. Awarding Plaintiff its litigation expenses, including reasonable attorneys' fees, costs, and
12 disbursements;
- 13 5. Awarding Plaintiffs punitive damages in the sum of not less than \$100,000,000.00 or an amount
14 otherwise to be decided by a jury; and
15
- 16 6. Granting such other relief as the case may require or as may be deemed proper and equitable.
17

18
19 Respectfully Submitted,

20
21 _____
22 MARK J. LIEBERMAN
23 Texas Bar No. 12332520
24 1704 Pine Hills Lane
25 Corinth, Texas 76210
26 (817) 905-3772
27 Mjc358@hotmail.com
28 *Lead attorney of record*

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