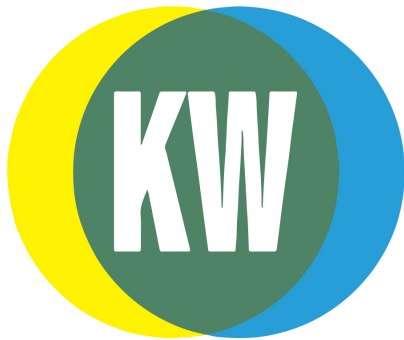


Remote Videotaped Deposition of: Alkiviades David

Jane Doe vs. Alkiviades David

March 1, 2024



KAMRYN I WHITNEY
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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

JANE DOE, an Adult Individual)
Suing Under Anonymity Due to)
Privacy and Safety,)
Plaintiff,) CASE NO.: 20STCV37498
vs)
ALKIVIADES DAVID, an individual,)
a.k.a. ALKI DAVID; HOLOGRAM USA,)
INC., a California Corporation,)
a.k.a. HOLOGRAM USA PRODUCTIONS,)
INC., HOLOGRAM USA ENTERTAINMENT,)
INC., FILMON.TV, INC., FILMON.TV)
NETWORKS, INC., and FILMON.TV LA,)
INC.; SWISSX LABS AG, INC., a)
California Corporation, a.k.a.)
SWISSX LOUNGE and FILMON.TV UK,)
LTD; and DOES 1 through 150,)
inclusive,)
Defendants,)

REMOTE VIDEOTAPED DEPOSITION OF
ALKIVIADES DAVID
FRIDAY, MARCH 1, 2024, 10:08 A.M.
ORANGE, CALIFORNIA

REPORTED BY: KATHRYN MARIE ADAMS, CSR No. 8391
Job No. 121665

1 APPEARANCES:

2
3 For Plaintiff:

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19 ALSO PRESENT: RUPERTO GARCIA, VIDEOGRAPHER
20
21
22
23
24
25

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF LOS ANGELES

3
4 JANE DOE, an Adult Individual)
5 Suing Under Anonymity Due to)
6 Privacy and Safety,)
7 Plaintiff,) CASE NO.: 20STCV37498
8 vs)
9 ALKIVIADES DAVID, an individual,)
10 a.k.a. ALKI DAVID; HOLOGRAM USA,)
11 INC., a California Corporation,)
12 a.k.a. HOLOGRAM USA PRODUCTIONS,)
13 INC., HOLOGRAM USA ENTERTAINMENT,)
14 INC., FILMON.TV, INC., FILMON.TV)
15 NETWORKS, INC., and FILMON.TV LA,)
16 INC.; SWISSX LABS AG, INC., a)
17 California Corporation, a.k.a.)
18 SWISSX LOUNGE and FILMON.TV UK,)
19 LTD; and DOES 1 through 150,)
20 inclusive,)
21 Defendants,)

22 REMOTE VIDEOTAPED DEPOSITION OF ALKIVIADES DAVID,
23 taken on behalf of the Plaintiff, in Orange,
24 California, commencing at 10:08 a.m., and concluding
25 at 12:24 p.m. on Friday, March 1, 2024,
reported by Kathryn Marie Adams, CSR No. 8391, a
Certified Shorthand Reporter in and for
the State of California, pursuant to notice.

1 I N D E X

2
3 EXAMINATION BY: PAGE
4 MR. DORDICK 6

5
6 EXHIBITS
7 EXHIBIT PAGE
8 Exhibit No. 1 Videotape 71
9 Exhibit No. 2 Videotape 73
10 Exhibit No. 3 Videotape 75

11 REQUESTED INFORMATION

12 (NONE)
13
14
15

16 MARKED FOR COUNSEL

17 (NONE)
18
19
20
21
22
23
24
25

* * *

1 ORANGE, CALIFORNIA, FRIDAY, MARCH 1, 2024
2 10:08 A.M.
3
4 THE VIDEOGRAPHER: We are now on the record.
5 Today's date is March 1st, 2024 and the time is 10:08 a.m.
6 pacific time. This is the video deposition of Alkiviades
7 David, in the matter of Jane Doe versus Alkiviades David
8 filed in Superior Court of the State of California for the
9 County of Los Angeles; Case No. 20STCV37498.
10 This deposition is taken place via web
11 videoconference with all participants attending remotely.
12 My name is Ruberto Garcia. I'm the videographer
13 representing K. W. Court Reporting.
14 Would counsel on the conference please identify
15 yourselves and state whom you represent beginning with the
16 questioning attorney?
17 MR. DORDICK: Dylan Dordick on behalf of the
18 Plaintiff in this case.
19 And we have counsel here from Greece,
20 Mr. Sofos, observing.
21 THE VIDEOGRAPHER: Thank you, Counsel.
22 Our court reporter is --
23 THE WITNESS: I just changed -- I just changed
24 my audio settings.
25 THE VIDEOGRAPHER: -- Kathryn Adams

1 A She worked for FilmOn.TV after I -- yeah. She
2 worked for FilmOn.TV.
3 Q Was providing you with massages one of her job
4 responsibilities?
5 A Dylan, you have absolutely no jurisdiction
6 over the bullshit that your criminal ass dad and Tom
7 Girardi cooked up. You know Tom Girardi wrote this
8 lawsuit originally, you do know that, don't you?
9 And you know Tom Girardi is standing trial in
10 May, and he is going to do a plea deal. And one of the
11 plea deals is, your company that doesn't even have
12 fucking insurance is criminally trying to extort me.
13 How does that feel, dickhead?
14 Q My -- my -- do you recall what my question
15 was?
16 A No. I don't. Ask it again. One more time.
17 Let's go.
18 Q Was giving you massages part of the
19 Plaintiff's job responsibilities?
20 A No. She didn't have a job.
21 Q She -- at FilmOn.TV?
22 A At FilmOn.TV? Yeah. She had a job but
23 that -- that -- that -- yeah, of course that wasn't one
24 of the descriptions. What kind of idiot are you?
25 Q But why is it then that you asked her to give

1 representing K.W. Court Reporting.
2 The court reporter will now swear in the
3 witness.
4 THE COURT REPORTER: Mr. Alkiviades, could you
5 please raise your right hand?
6 Do you solemnly swear in the following
7 videoconference deposition to tell the truth, the whole
8 truth and nothing but the truth, so help you God?
9 THE WITNESS: I do.
10
11 - EXAMINATION -
12
13 BY MR. DORDICK:
14 Q Mr. David, where are you located currently?
15 A In a car.
16 Q In what city or state?
17 A I am in Antiqua. The Nation of Antiqua.
18 Q Do you know a woman by the name of Margarita
19 Nichols?
20 A I do.
21 Q Did you hire her?
22 A No.
23 Q Did she ever work for any of your companies?
24 A She did.
25 Q Which one?

1 you a massage?
2 A When was this?
3 Q While she was employed at FilmOn.TV.
4 A When was that? When are you suggesting --
5 alleging, you criminal fucking lying idiot? It never
6 happened. So why are you -- you can't even give me a
7 date. You can't even give me a time because -- you know
8 why, because the woman has recanted, twice. She has
9 recanted but here you are hiding behind your dad's
10 asshole, who is hiding behind Girardi's asshole and
11 you're all going to get shut upon by the feds.
12 I just filed a federal lawsuit just yesterday.
13 I can give you -- I -- would you like me to read you the
14 case number --
15 Q Yes.
16 A -- where Judge Christopher Louie -- would you
17 like me to read you the case number, Dickhead?
18 Q Absolutely.
19 A Would you?
20 Q All right. Here we go. Stand by.
21 A Stand by. I'm so happy. I'm so happy you
22 asked because we got it back yesterday from the
23 Superior -- we are not -- I can't fucking wait. Stand
24 by, bro. You're going to shit your pants when you look
25 this up right now.

1 In fact, you know what, why don't we -- why
2 don't we do this. Why don't I give you the case number,
3 which is David, et al. vs. L.A. Superior Court, et al.,
4 right, and I have got a U.K. Tort lawsuit worth eight
5 zeros, right. And I have got a criminal lawsuit coming
6 at you from three other European jurisdictions where you
7 idiots have come after wrongfully criminally trying to
8 extort me.

9 Okay. So here's the case number. Are you
10 ready? Stand by. Um, I will give you the -- I will
11 give you the file -- the filed number, which was 022924,
12 case number -- are you ready? Are you writing this
13 down, dickhead? 2 colon 24 dash CV dash 01665. I
14 repeat, case 2 colon 24, dash CV dash 01665.

15 All right. I hope you enjoy and sweat your
16 fucking bullets off, you criminal -- do you know how
17 many people have waited for this day to see you people
18 end --

19 Q I would sus --

20 A -- to end your criminality, your -- your
21 syndicated corruption of justice.

22 Do you understand how historical a lawsuit
23 will be when you -- when you, you little douchebag
24 Dylan, end up -- because you know what racketeering
25 means? It means the whole fucking family. You know

9

1 that, don't you?

2 Q I think now would be a good time for me to ask
3 about your brain injury. Um --

4 A Yeah. Go ahead.

5 Q -- when did you --

6 A The one -- the one that everybody has known
7 about for years. Go ahead.

8 Q When did you suffer that?

9 A (No audible response.)

10 Q Do you need me to speak slower?

11 A I cannot hear you. Just a moment. Let me
12 unplug this. I can't -- I think you muted yourself or
13 maybe my speaker is off.

14 Q It -- it would be yours.

15 A I cannot hear you.

16 Q Can you hear me now?

17 A I will restart.

18 THE COURT REPORTER: Are we going off the
19 record?

20 MR. DORDICK: Making progress.

21 THE VIDEOGRAPHER: Are we going off the
22 record, Counsel?

23 MR. DORDICK: No. Let's just wait for him to
24 come back.

25 THE WITNESS: All right. I can hear you now.

10

1 MR. DORDICK: Okay. We can't see you, though.

2 THE WITNESS: Well, too bad. I have done my
3 swearing in. We can carry on. Go on.

4 BY MR. DORDICK:

5 Q We need -- Mr. -- how can you -- how can you
6 put this on your website if you don't have your video
7 on?

8 A I can put me on my website. I don't need
9 to put me. I'm shooting myself on the right-hand side,
10 you dickhead.

11 Q So you have another camera running in the
12 background?

13 A I may be.

14 Q Say that again?

15 A I may be. Maybe I do. I need it as evidence,
16 don't I, you fucking idiot?

17 Q Are you --

18 A By law, by California law, you fucking
19 idiot --

20 Q So --

21 A -- when you are collecting evidence, such as
22 this, you have every right to record it.

23 So please carry on.

24 Q Would it be fair to say that that right is
25 mutual to say -- meaning, we both have that right?

11

1 A Listen Dordick, you're going to prison, so you
2 have every right to try and do and support and defend
3 yourself in any which way you can.

4 But what you and your father and Girardi and
5 Allred and Bloom and Griffin and fucking -- the list
6 goes on of people. Would you like me to read you the
7 whole list? Would you like -- do you -- do you not
8 realize that -- why don't you take yourself fifteen
9 minutes, look up that case that was filed yesterday in
10 L.A. Superior Court against L.A. Superior Court? Why
11 don't you look at it?

12 And you see, we've exhausted all their
13 remedies; we're now in the Federal Court. How does that
14 feel? You like that? You like that the feds are now
15 going to be breathing down your insurance's back. You
16 don't have insurance.

17 Q My question to you is --

18 A Do you? Do you have insurance? Do you have
19 insurance to be conducting this? Do you?

20 Q Okay.

21 A You don't have insurance, do you? Because
22 nobody will back your dad.

23 Q You have taken -- you have had your deposition
24 taken before.

25 Correct?

12

1 A I have taken many depositions.
2 Q Okay. And --
3 A And many with a knowledge of my brain injury.
4 So go ahead, ask your question.
5 Q In those depositions, who is the one,
6 typically, that it suppose to be asking the questions?
7 A Go fuck yourself, you idiot. Please, don't
8 pander me. Because if -- you're just going to get
9 abused right back. And I have a -- you know, and you
10 and your fucking father are a disgrace to humanity. You
11 really are. You are fucking pathetic. You should be --
12 you should be taken out and shot for what you do.
13 Because what you do is like you hurt people in
14 wholesale, you criminal fucking douchebags. Goddamn.
15 Q All right. You have a website called Shockya.
16 Is that correct?
17 A I don't. My corporations that I am involved
18 with own and control that and many other websites, yes.
19 Q And you write a -- content on that under the
20 name, Grady Owen?
21 A Sometimes, sure.
22 Q And there was an article there in which you
23 mentioned that this -- this legal cabal had been
24 bringing shame to the David name.
25 Do you recall that?

13

1 A I do not.
2 Q Is it your concern that that's what these
3 lawsuits are doing?
4 A No. It's not my concern of what these
5 lawsuits are doing. My concern is that I'm being
6 attacked by a bunch of criminal thugs who have first
7 right to destroy my companies; then tried to destroy me.
8 You know, there is a very famous case called
9 FilmOn versus Double Verified. Double Verified owned by
10 Comcast. Comcast is the same company that employs your
11 douchebag father along with Tom Girardi and the rest of
12 them --
13 THE COURT REPORTER: I'm sorry. Can you just
14 slow down a little bit for me, David? I'm so sorry.
15 THE WITNESS: Yes. That's all right.
16 Comcast is the same company that owns Double
17 Verified; is the same company that employs douchebags,
18 douche is, D-O-U-C-H-E-B-A-G-S, I prefer one word, is,
19 um, the company that employed these douchebags and was
20 part of a racketeering complaint that I filed in Texas
21 but then was trafficked by your corrupt little system
22 right by the hands of the same corrupt douchebags that I
23 am now filing a writ against.
24 So this writ supports texted evidence that
25 proves that everything that you are doing, Mr. Dordick,

14

1 is completely corrupt. Texts that were given to me by
2 one Mary Rizzo, through the lawyers, right, by one Mary
3 Rizzo, during the Mayhem com trial, that you're going to
4 be bringing up, I believe, probably in this deposition.
5 This fucking -- fucking mess of a corrupt cesspool;
6 working with unelected douchebags that you criminally --
7 you are -- you are repellant people.
8 MR. SOFOS: Please reply -- Alki -- Alki,
9 please reply --
10 THE WITNESS: I don't even fucking know what
11 you are talking about. What do you mean reply?
12 Come on in, guys.
13 What the fuck are you talking about? I have
14 replied. That's my reply.
15 BY MR. DORDICK:
16 Q David, my question is, when did you suffer
17 your brain injury?
18 A When I was 18.
19 Q And how did it happen?
20 A I was run over by a car. And I was in a coma
21 for four days.
22 Q Do you have any medical records to support
23 that?
24 A Plenty.
25 Q From where -- where can I get these records?

15

1 A Go fuck yourself. Look, they're readily
2 available online. And we will put you in touch with all
3 the doctors who have done all the MRI's to death to
4 prove to you that you are a bunch of criminals, you
5 fucking douchebags.
6 Q I'm talking about the records that state that
7 you were in a coma. Do you know where we might obtain
8 those?
9 A Yeah, you can. The Royal Free Hospital in
10 London where I was -- where I was there for a month and
11 a half and in a coma for four days. The Royal Free
12 Hospital, circa 1980; whatever it was. Figure it out.
13 Q And how did you get hit by this car? Did you
14 walk in front of it while you were a pedestrian?
15 A I was run over by a car that was doing fifty
16 miles an hour in a fifteen mile an hour zone.
17 Okay.
18 Q And what treatment since you left the hospital
19 have you received for this injury?
20 A Many.
21 Q Okay.
22 A I had broken arms, I had broke -- my back. I
23 had two broken arms; I had a broken knee; I had
24 lacerations -- I had three brain fractures; that's what
25 kept me in the coma.

16

1 Would you like me -- I mean, the list goes on.
2 Would you like more stuff? There is a lot of internal
3 damage that I can go into it.
4 Q Let's say, in the last 20 years, what
5 treatment have you received?
6 A Plenty. I have maintained sobriety for 20
7 years. Um, I have -- um --
8 Thank you.
9 Which -- which actually it's longer than 20
10 years, what am I saying, now 24 years. Um, I have --
11 um, I have done plenty of therapy. I have done plenty
12 of MRI's. I have done -- I have done plenty of
13 counseling. I have done plenty of self-help, probably
14 stuff that you wouldn't even understand because you come
15 from a long line of criminal douchebags, don't you?
16 People that are prepared to lie, cheat and steal and rob
17 people of their hard earned -- either wealth or their
18 livelihood or whatever it is that you choose to rob from
19 them.
20 Q All right. Would you agree that even at a
21 minimum if the allegations are true, it might actually
22 be one of the most noble things to do to stand up for
23 somebody who was raped by her boss?
24 A Who is that? You? You, you're standing up?
25 Where is it you're standing up?

17

1 First of all, the rape never happened. This
2 is a complete fiction created by Mr. Tom Girardi.
3 Mr. Tom Girardi who pinned this lawsuit. The same
4 Tom Girardi who is standing trial in May for exactly the
5 same co- -- corruption, trafficking justice, lying in
6 wholesale, corrupt handling of an insurance lien.
7 The scam is in the billions, if not trillions
8 of dollars over 45 fucking years that you, your father,
9 Gloria Allred have all been doing this.
10 MR. SOFOS: Alki, rape never happened. That's
11 enough.
12 MR. DORDICK: I --
13 THE WITNESS: I already told them the rape
14 never happened, you fucking idiot.
15 BY MR. DORDICK:
16 Q Did -- did you have sex with the Plaintiff in
17 this case?
18 A Who?
19 Q The Plaintiff, did you have sex with her?
20 A I did. Uh, in -- well, the month -- the month
21 before she arrived with a birthday cake at my facility,
22 and the day she discovered that I was no longer dating
23 her, then I got back with my girlfriend who I was
24 separated for for a week. And this woman moved into my
25 hotel room, Margarita Nichols, whom, by the way, has

18

1 recanted twice. Twice this woman as recanted
2 habitually; twice recanted.
3 But here you are, you criminal frightened
4 little fuck, you criminal fucking wholesale fucking --
5 you -- you are -- you are so fucking disgusting --
6 MR. SOFOS: Alki -- Alki, please.
7 THE WITNESS: -- this woman has recanted twice
8 but here you are continuing the extortion.
9 MR. SOFOS: Alki --
10 THE WITNESS: How do you feel about that? You
11 have been sanctioned three fucking times in this
12 lawsuit.
13 MR. SOFOS: That's enough, Alki.
14 THE WITNESS: Three times.
15 MR. SOFOS: Alki --
16 THE WITNESS: Twice for the woman not turning
17 up. Where is her current deposition?
18 MR. SOFOS: That's enough.
19 THE WITNESS: It doesn't exist, does it?
20 MR. SOFOS: That's enough.
21 THE WITNESS: Because you made it up. Because
22 I will fuck you --
23 MR. SOFOS: Alki, that's enough.
24 THE WITNESS: That is --
25 MR. SOFOS: Alki --

19

1 THE WITNESS: Okay. You all are a bunch of
2 fucking conniving douchebags. So go on Dordick.
3 MR. SOFOS: Okay. Next question. Alki,
4 that's --
5 BY MR. DORDICK:
6 Q On how many occasions --
7 A Going on.
8 Q On how many occasions did you have sex with
9 the Plaintiff?
10 A One time.
11 Q And where was it?
12 A It was in the theater.
13 Q Where, specifically, in the theater?
14 A It was in the stor- -- in the -- in the, um,
15 data room.
16 Q And how did that happen? How did that occur?
17 A Um, the lady came in, um, uh, looking for me,
18 and she had been sleeping in my hotel room for the last
19 three nights. We had -- we had known each other for
20 many years. She had been on my case wanting to be with
21 me for years. And we had sex in that room.
22 And you guys allege that my dying doberman
23 that she brought up as a puppy while she worked at
24 FilmOn; she wasn't an employee of mine at the time that
25 we did have sex. And you know this and you know that

20

1 she has recanted twice. You know that she has recanted,
2 but here you are, Mr. Dordick, asking extortionate
3 questions.
4 How does that make you feel?
5 MR. SOFOS: Mr. --
6 THE WITNESS: She has recanted twice; twice
7 she --
8 MR. SOFOS: Alki --
9 THE WITNESS: -- recanted. And this whole
10 rue -- this whole, yes, you said yourself, the valor of
11 lawyers who have gathered together to -- for decades
12 extort people like myself. Like Rose McGowan, like
13 Kanye West, like Fifty Cent; like all of these people
14 that I now like to align myself with because they are
15 all victims of your famed bunch of criminality.
16 BY MR. DORDICK:
17 Q Is this cabal in the room with us now?
18 A I don't know. Are you part of it? Are you
19 part of it? Because I would say that your father, who
20 has for years, decades, worked with Gloria Allred,
21 Lisa Bloom, Keith Griffin -- you know that Keith
22 Griffin -- do you know who Keith Griffin is?
23 He is one of your company's -- company's
24 partners. Who was Keith Griffin before? He worked at
25 Girardi Keith. Who else was indicted along with -- who

21

1 else was indicted along with Tom Girardi for the whole
2 Chicago scam? Keith fucking Griffin, your partner, a
3 partner that you don't advertise. A partner that is
4 your partner in your fucking law firm. A partner that
5 has zero jurisdiction over me.
6 MR. SOFOS: Alki --
7 THE WITNESS: Zero jurisdiction --
8 MR. SOFOS: Alki --
9 THE WITNESS: -- and hear you are, in my -- in
10 all this --
11 MR. SOFOS: Alki --
12 THE WITNESS: -- sitting there in your corrupt
13 little asshole -- in your asshole self dictating --
14 MR. SOFOS: That's enough.
15 THE WITNESS: -- so go fuck yourself.
16 MR. SOFOS: Next question.
17 THE WITNESS: Can you please shut up and let
18 me finish? Shut the fuck up and let me fucking finish.
19 All right? I have my voice quailed by this corrupt
20 system. This is my opportunity to express my anger, so
21 suck my dick.
22 MR. DORDICK: Okay. Mr. Sofos has been
23 nothing but polite and professional and --
24 THE WITNESS: Just shut your fucking face, you
25 insolent cunt and get on with it.

22

1 MR. SOFOS: Alki --
2 THE WITNESS: Shut up. Get on with the
3 question.
4 BY MR. DORDICK:
5 Q Was the Plaintiff an employee of FilmOn.TV at
6 the time you had sex with her?
7 A No.
8 Q Who was she an employee of at that time?
9 A She was not an employee. She was hustling for
10 a job all the time, trying to be a Hostet. It was a
11 made up fucking job by herself, a Hostet. Things that
12 never happened. And she was completely out of her
13 fucking mind. The day that she accused me of raping her
14 is the day that she also accused her husband and her
15 best friend of raping her.
16 And she put me in her medical records, right,
17 that you have been sanctioned over, her medical records,
18 you fucking idiot that she lied about all of this. And
19 she has recanted twice.
20 And here you are, Mr. Dordick, supporting
21 Mr. Tom Girardi's records for what, exactly for how much
22 do you think? How much do you think you're going to get
23 from me? Zero because you are going to prison.
24 Next question.
25 Q All right. Who -- what of your companies did

23

1 the Plaintiff work for?
2 A In the past, she worked for FilmOn.TV.
3 Q Okay.
4 A At the time of the alleged rape, which is a
5 complete fabrication by Tom Girardi and who else? Who
6 else? Oh, Gary Dordick that, in fact, did use to work
7 for Tom Girardi, but everybody hides that fact. But he
8 did work for Tom Girardi and Keith Griffin, your current
9 partner is -- was Tom Girardi's direct partner at
10 Girardi Keith. And guess what? What about Neal -- what
11 about -- what about Mr. Goldberg?
12 What about -- what about that litigator,
13 Goldberg, Maroko and Allred -- Allred, Maroko --
14 whatever they like to put it in; whatever order they
15 like to put it in. What about Nathan fucking Goldberg
16 working with Tom Girardi over that fucking -- for
17 decades. And then with Dordick, with Gary Dordick's
18 deep involvement. All of you douchebags.
19 Were you at Loyola? Were you at -- were you a
20 paid for lawyer at Loyola Law School? The Girardi
21 School of Law. Were you there, as well, douchebag?
22 Q Mr. David, have you ever --
23 A Were you at Loyola?
24 Q Have you ever heard --
25 A Were you at Loyola? Were you -- are you a

24

1 Loyola graduate, douchebag?
 2 MR. SOFOS: Alki, that's enough.
 3 THE WITNESS: No, it's not. Absolutely
 4 deserves -- go fuck yourselves, all of you.
 5 MR. SOFOS: Alki --
 6 THE WITNESS: Every single one, my counsel
 7 included. Because you're all a bunch of fucking
 8 thieving conniving fucking cunts.
 9 MR. SOFOS: Alki, I --
 10 THE WITNESS: Next.
 11 BY MR. DORDICK:
 12 Q Have you ever --
 13 A Next question.
 14 Q Have you ever heard of Occam's Razor?
 15 A No.
 16 Q That the simplest explanation is often the
 17 truest one. Is that something you have heard?
 18 A I have never heard that.
 19 Q Um --
 20 A Or if I have, I have forgotten and it's
 21 meaningless to me. I don't -- no. I have not heard of
 22 it. Not in my consciousness, no.
 23 Q Okay. So the question originally was, at the
 24 time that you and the Plaintiff had sex where -- who was
 25 she an employee of?

25

1 A I have already told you that she was not --
 2 she was not an employee. I do not know who she was
 3 working with.
 4 I do know that of the four people that I have
 5 just filed a writ against, a federal writ that will put
 6 all -- what -- that will put them all in prison, I do
 7 know that of the four of those four -- all four were
 8 colluding with Margarita Nichols, the lady that has
 9 recanted twice now and your law firm has been
 10 sanctioned, notice that three times in this -- in this
 11 particular lawsuit that you are now taking deposition
 12 for.
 13 I have given you the federal lawsuit -- the
 14 federal writ that was filed yesterday and is now with
 15 response in the system that named Judge Louie --
 16 Christopher Louie, the presiding judge of this
 17 particular fucking fakery that you cooked up with Tom
 18 Girardi, right, that is now in the system.
 19 Where are we going guys?
 20 (Inaudible.)
 21 THE WITNESS: Yeah. Don't worry about these
 22 fucking guys. You can -- you can -- all day long --
 23 they mean nothing.
 24 Now, what is your next question, dickhead?
 25

26

1 BY MR. DORDICK:
 2 Q You mentioned that you have been sober for 24
 3 years. Is that from drugs, as well as alcohol?
 4 A I -- well, yes, absolutely. I mean, I have
 5 not touched cocaine in 30 something years. And alcohol,
 6 I haven't drunk in 20 something years. And -- and,
 7 yeah, that's -- that is -- and, you know what, alcohol
 8 was never really a problem of mine. My problem was my
 9 head injury.
 10 Q Are you currently under the influence of any
 11 drugs, including marijuana?
 12 A I smoke cannabis, sure. I smoke CBD flower on
 13 the reg -- on a daily basis.
 14 Q And have you done so today?
 15 A Of course.
 16 Q Is this going to affect your ability to give
 17 your testimony here today?
 18 A Well, to say that you're a lying corrupt sack
 19 of shit. Are you fucking kidding me? You know -- you
 20 know that you are doing this without insurance. You
 21 know that your client has recanted twice. You know that
 22 she is in a lawsuit under your direct -- your directing
 23 pinned by Tom Girardi, who is --
 24 MR. SOFOS: Alki --
 25 THE WITNESS: -- May 15th for this

27

1 same corruption.
 2 BY MR. DORDICK:
 3 Q Look --
 4 A How do you feel about, dickhead?
 5 Q Mr. David, do you have --
 6 A How do you feel about that, Dordick, because
 7 racketeering means --
 8 THE COURT REPORTER: Okay. I'm sorry.
 9 THE WITNESS: How do you feel about that?
 10 THE COURT REPORTER: I'm sorry. The court
 11 reporter --
 12 THE WITNESS: Now, I am a disabled human
 13 being. I have plenty of MRI's to prove it. I have
 14 plenty of historical data to prove it. And I am
 15 standing up for my fucking rights under the ADA laws,
 16 and the human rights laws. You guys have continually
 17 exploited and extorted me and my life no more. The
 18 evidence is in. You guys are going to jail.
 19 BY MR. DORDICK:
 20 Q Has your brain injury affected your ability to
 21 operate a business successfully?
 22 A No. I run very successful businesses.
 23 Despite your attempt to extort them, I run very
 24 successful businesses.
 25 Q Has FilmOn.TV gone bankrupt?

28

1 A No, sir.
2 Q Has the Hologram USA business gone bankrupt?
3 A No, sir.
4 Q All of them are still currently operating?
5 A And making millions of dollars.
6 Q In the United States?
7 A Yes, sir.
8 Q Is there a reason --
9 A Right in your background, right in fucking Los
10 Angeles. How about that? Why don't you go to fucking
11 Universal Studios and go have a good look around.
12 Q Are you able to go to Los Angeles?
13 A I am not able to go to Los Angeles. Does that
14 stop me from doing business in Los Angeles, you fucking
15 retard?
16 Q My question is, do you know why FilmOn.TV is a
17 suspended corporation?
18 A Are you going to try -- excuse me. What did
19 you just say?
20 Q Suspended -- why the corporation -- why
21 FilmOn.TV is a suspended corporation?
22 A In which country?
23 Q The United States.
24 A Go fuck yourself, you fucking retard. Really,
25 go fuck yourself. This is what I mean by you don't have

1 Q So do you --
2 A Why would I do that?
3 Q Do you currently operate --
4 A Why don't you -- why don't you ask me the
5 question, as a human being, why would -- why would
6 another human being walk into the raping, the callous
7 criminal raping of the -- of the -- of the complete
8 disregard of human rights? Why -- why would somebody do
9 that?
10 Q That's a -- that's a very good question,
11 Mr. David --
12 A Yeah.
13 Q -- and I --
14 A Yeah. So you are going to try to deflect on
15 me. This is your fucking stupid little thing that you
16 learned in law school. Are you some kind of retard?
17 Can't you hear what I'm saying to you? You're on the
18 cycle of babble of questions set up by -- did you even
19 write the question? Or did your dad overlook --
20 MR. SOFOS: Alki --
21 THE WITNESS: -- them? Because if he did,
22 you're even deeper. How about that? Maybe there is a
23 record of e-mails back and forth who we're going to show
24 us how much collusion you actually did have with your
25 dad. How about that, douchebag?

1 jurisdiction, you fucking retard. You know that there
2 is a billion -- one billion plus dollar -- sorry,
3 pound -- pound court claim coming in, including your
4 firm. You -- you personally now as a result of today
5 are deeply wrapped up with your fathers fucking
6 corruption and your fucking perfect little sister, who,
7 by the way --
8 MR. SOFOS: That's enough. Alki, that's
9 enough.
10 THE WITNESS: -- so go ahead. Did you -- did
11 you just tell me to shut up?
12 MR. SOFOS: Go to the next question.
13 BY MR. DORDICK:
14 Q Mr. David, do you know if Hologram USA is
15 still a functioning business or if it's been
16 suspended --
17 A Making millions of dollars. Making millions
18 of dollars every fucking month.
19 Q Why is it that it's suspended then?
20 A What is -- what do you mean suspended?
21 Q In California, Secretary of State --
22 A You are trying to extort it, is that what
23 you're saying? Why -- why would I be doing business in
24 a place full of, you know, criminal vipers like you?
25 Why would I do that? Why?

1 BY MR. DORDICK:
2 Q Is it fair -- is it fair to say that your
3 traumatic brain injury effects your ability to control
4 your emotions?
5 A No, not at all. On the contrary, we're going
6 into hyper -- it actually goes into hyper control,
7 actually. Would you happen to believe that, huh? You
8 wouldn't -- you wouldn't believe that because that would
9 scare the living shit out of you, if you realize what
10 that means. That means you are talking to somebody,
11 bro, who is A, indestructible and B, going to fuck you
12 so badly personally after today.
13 How about that?
14 Q Do you mean that in the literal sense?
15 A I mean, I'm going to fuck you up so badly.
16 And it is my alienable right and my first amendment
17 right to say suck my dick, you fucking Jew bitch.
18 How about that?
19 Next question.
20 Q Sure. My question is, what effects does the
21 brain injury have you on? How does that effect your
22 life?
23 A The effects of this -- the effects of this are
24 when I am attacked -- when I am wrongfully attacked --
25 when I perceive that I am being attacked by some person

1 who has no justification to be doing that, other than
2 for negative or evil intentions, I go on the fucking --
3 what we -- what we would call rampage. And that rampage
4 means a very focused -- very focused and very, very
5 controlled attack right back that is going to ensure
6 that my adversary is thoroughly destroyed for doing what
7 they're doing to me.
8 Do you understand that? And that includes
9 lying, cheating -- and let me tell you something else.
10 I believe in God, deeply believe. I am a deeply
11 spiritual --
12 (Inaudible.)
13 THE WITNESS: Sorry. Oh, okay. Are we going
14 to the side. Okay.
15 So I -- I -- I consider myself a deeply
16 spiritual man. I'm a Christian Orthodox -- I come from
17 a long line of peasants and priests. I pray regularly.
18 I meditate regularly.
19 Which way?
20 And I am a -- I am a well-known individual for
21 my character and the kind of person that I am. So there
22 is no way that you are taking me down. There is plenty
23 of evidence to prove that you are just reporting --
24 standing on a sack of lies that you, your father and
25 Mr. Tom Girardi have created.

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1 Next question.
2 BY MR. DORDICK:
3 Q Does -- does your brain injury or any health
4 ailments you have effect the function of your penis such
5 that it would not be possible for you to rape the
6 Plaintiff?
7 A I don't -- I don't -- I don't think that's
8 a -- I don't think that's a question that I'm even -- I
9 find that it a degrading question that's intents of
10 slamming. But, you know, just to -- just to satisfy
11 you, I would say that I have great sexual prowess. I
12 have four beautiful wife's that I have
13 great relationships with. I have four delightful
14 children and sometimes I get pissed at them. And, yeah,
15 so, probably, I would say, yeah, my dick works.
16 Q Okay. Do you have a policy against sexual
17 harassment at FilmOn.TV?
18 A Yes. We have very strict policies, actually,
19 extremely strict policies.
20 Q And do those apply to you?
21 A And you know what, every time -- every time
22 the subject came up, every time somebody sexually
23 harassed or there was discussion of sexual harassment,
24 we went into it deeply. That was something of great
25 concern of the company.

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1 Anyway, the bastardization of the principles
2 and the ethics that I have built my company and stayed
3 in -- the very first question out of your mouth about my
4 father's legacy, right, and my great father, my dear
5 father's legacy that you -- you and your disgusting
6 fucking, you know, filthy hand of touch with your -- you
7 know, your concoctive lie for no other reason than to
8 extort and steal money that -- not only is not
9 rightfully yours in any way, but it -- it makes me
10 completely focused on the notion that I am going to end
11 your career.
12 How about that?
13 Q Mr. David, is it fair to say that you never
14 paid any of the victims of -- who have gotten judgments
15 against you any money?
16 A That is absolutely correct.
17 Q So how is it that we can be doing this for
18 money if you never paid a single one of them anything?
19 A Because you're hoping and you're also
20 embarrassed, and you are also sweating your fucking
21 balls off. Why are you here? Why are you here,
22 douchebag? Why are you here? Why isn't any of the
23 other real interested parties -- they aren't listening
24 in on some -- or whatever. You know, I don't really
25 give a fuck why you're here, bro.

35

1 But the facts are this, is that you are in a
2 locked -- you are in a locked battle now, and you're
3 going to go down. Because I've got heaps of evidence to
4 prove that what is going on now is an extortion. I have
5 heaps of evidence, and it is right there for you to read
6 in 152-page writ published yesterday to the -- to the
7 now, uh, former PACER system, which is now the NextGen
8 system, is now published in that system so you're very
9 happy to -- so you're very welcome to go look at it.
10 And you can go see Mr. Dordick's name, which,
11 I think is your same last name right there in with that
12 whole fucking corrupt crew.
13 So go on. Next question.
14 Q You never met me --
15 A This -- you -- have you looked up the fucking
16 lawsuit yet? Did you look it up yet?
17 Q No.
18 A Probably not. Yeah.
19 Q Mr. David --
20 A I would do it at lunch. I would do it at
21 lunch, and then I would sweat your fucking balls off
22 because after that, you're going to know that you're
23 going down.
24 What is your next question, dickhead?
25 Q You have never met --

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1 A And you are going down. Do you know why
2 you're going down? You're going down in the Federal
3 Court in the United States; you are going down in the
4 European Courts of Human Rights; you're going down in a
5 Greek Federal Court; you're going down in a UK -- a
6 UK -- King's Council is already deep in precluding you
7 people.
8 All right. And then whatever happens in the
9 Federal Court System, like in support of all of the
10 states that I fined based on the law that you have zero
11 jurisdiction over me, zero jurisdiction. You have never
12 had jurisdiction over me or my companies. But here we
13 are and you know that. How do you know that because all
14 of your attempts to extort me abroad, which is how I get
15 jurisdiction over you --
16 MR. SOFOS: That is enough, Alki.
17 THE WITNESS: -- you have filed repeatedly.
18 MR. SOFOS: Alki --
19 THE WITNESS: Next question, dickhead.
20 BY MR. DORDICK:
21 Q Have you filed a lawsuit in the Los Angeles
22 County Superior Court in the last two years?
23 A Several.
24 Q Okay. And in those cases, did they have
25 jurisdiction over you?

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1 A Uh, I -- I was -- uh, I was filing lawsuits
2 against you dickhead; not the other way around.
3 Q So there was only jurisdiction when you filed
4 them but when filed against you, there isn't any?
5 A That's correct. I was filing federal
6 lawsuits, you fucking idiot.
7 Q Where did you learn how to run a company, a
8 business?
9 A I come from a long line of pheasants and
10 priests who are also great entrepreneurs.
11 Q And they taught you?
12 A Fuck off to the next question. All right.
13 That's my answer.
14 Q Okay. Did you always pay your employees on
15 time at FilmOn.TV?
16 A I will answer you that question because, you
17 know, I have maintain -- I have been able to
18 miraculously keep the show on the road and protect
19 myself from the -- you know, I have had four -- four
20 lawyers murdered. I have had two attempted murders on
21 my life in Malibu, you know that? Did you know that?
22 And it's on the record, as well. The local D.A. tried
23 to put two of them away for 12 years. Did you know
24 that?
25 Did you know that attempts on my life have

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1 been made over this very subject where you -- you're
2 involved in? Did you know that? I bet --
3 Q Did you --
4 A -- you may think that it is some kind of
5 fantasy or some kind of neurosis or whatever the fuck
6 you want to call it, but it's not. There is plenty of
7 evidence with names and dates and locations and
8 photographs and videos and police reports and the whole
9 nine yards to prove that you are part of a syndicate of
10 criminals.
11 Q My question was, do you pay your employees on
12 time at FilmOn.TV?
13 A My question is and the answer was at the time
14 that it became very difficult for me to pay anybody
15 after all of my cash ran out and made it very, very hard
16 for me to survive because of your criminality.
17 So, yes, it made it very difficult for me way
18 back, years, not -- not -- not -- not -- not -- not --
19 not during the Hologram Theater times that you are
20 alleging that all this shit happened.
21 You know, all this stuff is stuff that your
22 father made up along with Tom Girardi. Tom Girardi
23 wrote this lawsuit originally, then your dad rewrote it,
24 probably added stuff, God knows why he did. And here
25 you are adding more stuff and you understand how RICO

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1 works? Do you understand what the racketeering laws in
2 the United States are like? Do you understand? Do you
3 understand that there is injustice -- do you know if you
4 read my writ, you will see about the three justices who
5 went to prison in San Diego because of Tom Girardi.
6 What do you think happens when this -- why do
7 you think Judge Roscoe was retired a year early? Why do
8 you think Judge Chris Falls incarcerated me for six days
9 for wrongful -- wrongfully incarcerated me in L.A.
10 County for -- originally five days, but I was there for
11 six days. So on the sixth day, I became a political
12 prisoner, right.
13 So why is it that this Judge is now kicked out
14 of his -- uh, his room that he was in, his court in
15 Pomona that he was in for 20 years and is now on traffic
16 duty. Because they're pending going to jail. Because
17 there is a task force chasing you people. Do you
18 understand me? Because I have been talking directly to
19 them over the years. Do you understand me? And you are
20 going to jail, son.
21 MR. SOFOS: Alki --
22 BY MR. DORDICK:
23 Q Mr. David --
24 MR. SOFOS: Alki --
25 THE WITNESS: You are really legitimately

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1 going to prison.
2 Next question.
3 BY MR. DORDICK:
4 Q Uh, did you have a company that you used for
5 payroll or an employee that was in charge of payroll at
6 FilmOn.TV?
7 A Uh, I cannot remember. I really cannot
8 remember. I assume we used some -- there were different
9 things over the years -- there were different things
10 over the years, sure. I'm sure. I'm sure at some
11 point, sure.
12 Q Do you know a gentleman that went by the name
13 of Beau Rock?
14 A Yeah. He was -- yeah. I remember Beau Rock,
15 sure.
16 Q What did he do?
17 A Beau Rock was a performer. He was a famous
18 performer. And he performed sometimes and he would --
19 and some -- sometimes he would help set up events.
20 Q And did he interact --
21 A He was -- he was fundamentally a performer and
22 he helped -- he helped -- yeah. He helped -- he came in
23 and did a bunch -- tried to do a bunch of live events
24 for me at the theater.
25 Q Did he act as security for you at any point?
41

1 A No. Not as security, no.
2 Q And did -- did Mr. Beau Rock interrupt your
3 sexual intercourse with the Plaintiff?
4 A No.
5 Q He -- you did not --
6 A Oh -- oh -- oh, I see. Is this what you have
7 done? You have somehow magically got Beau Rock -- you
8 paid him a few bucks. Is that what you're doing? Is
9 that -- no. Beau Rock did not interrupt anything
10 because there wasn't any -- there wasn't anything
11 wrongful for him to see. Is this what you're saying?
12 Is this what you're fucking saying?
13 Q No.
14 A He -- he knows -- Beau Rock was not there.
15 Beau Rock did not come in while there was a sexual
16 intercourse going on between me and -- and Margarita
17 Nichols.
18 Thank you, Ma'am.
19 Q That is to say you finished having sexual
20 intercourse with her?
21 A No. It means that I didn't see -- I don't
22 think I ever saw Beau Rock ever again. I don't -- I
23 don't think I saw him, to tell you the truth.
24 Q Did you --
25 A From that day, I don't think I ever -- I don't
42

1 think I ever saw him -- I don't think I saw -- I think
2 he had already left the theater by that -- he wasn't
3 involved with the theater anymore by that point.
4 Q Did you finish having sexual intercourse with
5 her?
6 A No. Beau Rock -- Beau Rock wasn't even there
7 at the time of the alleged incident.
8 Q My question is, did -- did you finish having
9 sex with her? Did you have sex to completion?
10 A Excuse me?
11 Q Orgasm.
12 A What does that mean, orgasm? What does that
13 mean to you? I don't understand. What does orgasm mean
14 exactly to you?
15 Q Well, I'm trying to figure out if -- if the
16 rape was interrupted or if it was to completion --
17 A Well, first of all --
18 Q -- in --
19 A First of all -- first of all, you saying that
20 word rape, I find so fucking offensive. I find your --
21 your questions deeply offensive and rude. Absolutely
22 no -- the rape did -- zero happened. This woman has
23 pursued me for years.
24 For months after the alleged -- the alleged
25 incident -- incident, the alleged rape, the word rape
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1 that you use -- so loosely use, right, after your
2 alleged rape -- after your alleged rape, this lady shows
3 up a month later with a birthday cake, right. She sends
4 me love notes. She is angry at me because I get back
5 together with my girlfriend.
6 She talks with Chastity Jones, who is part of
7 this riff that I told you about. Chastity Jones
8 persuades her to go talk to who, Lisa Bloom, who turns
9 her on to who, Tom Girardi, who turns her on to who,
10 Gary Dordick, who is, what, another part of the
11 syndicate. Part of the syndicate that is absolutely
12 100 percent -- read the writ, is going down. You guys
13 have got no way out. Zero way out. I promise you. I
14 promise you, read the writ. You guys are fucked.
15 Next question, sir.
16 Q The question was, when you -- when you had
17 intercourse with the Plaintiff, did you have it to
18 completion?
19 A I don't think so.
20 Q And -- and was that because --
21 A I -- I -- I do know. Actually, no. You know
22 what, no. No. No. I don't think so.
23 Q Okay. Is that because it was interrupted?
24 A No. Because I realized that I didn't want to
25 be with this lady. That's right. No. I remember now.
44

1 I remember because -- you know, she had been on my case
 2 for years. She had been sleeping in my hotel room
 3 for three days. She had been, like, all over me with
 4 her -- you know, all over me.
 5 And then -- okay, let's have sex. We had sex
 6 because for one week, bro, one week, these records you
 7 won't understand probably but for one week I was
 8 separated from my -- from my -- from my beloved -- from
 9 my beloved girl, who I hopefully I will be getting back
 10 with together very soon.
 11 But you guys are -- you guys have worked so
 12 hard to try to separate us, right. I was separated for
 13 weeks from my -- from my -- from my -- from my woman.
 14 And I felt secure with Margarita, so fucking, you know
 15 what, let me try. And, you know what, I knew from then
 16 that I didn't want to be with her. So that's why I
 17 didn't orgasm.
 18 Next question.
 19 Q That is to say in the middle of the
 20 intercourse you realized that you no longer wanted to be
 21 with her?
 22 A No. It wasn't right for me to be doing this.
 23 I didn't want to have sex with this woman. She was not
 24 the woman for me. For me to have sex with a woman, it
 25 has to be a long term relationship. If you've noticed,

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1 I've only been -- I only do long term relationships. I
 2 don't date, and I only do long term relationships.
 3 That's is who I am.
 4 Q And --
 5 A I don't sleep around. Listen.
 6 Q And --
 7 A Listen, I don't sleep around. I don't fuck
 8 around. I like monogamy. I like it. I love it. I
 9 love -- I love deep monogamous relationships. It's my
 10 thing. And all of my wives will tell you that.
 11 Okay. Next question.
 12 Q What are the names of all your wives?
 13 A Fuck you. Next question.
 14 Q Well, I --
 15 A Listen -- listen -- listen -- listen, listen,
 16 you come close to any of my family, I will beat your
 17 fucking face and that is not a fucking threat; that's a
 18 fact. I will find you, and I will beat the living shit
 19 out of you. Do you feel me?
 20 MR. SOFOS: Alki, this is enough.
 21 THE WITNESS: No. No. Shut up. Shut up.
 22 That is a fucking threat that is real because I'm
 23 talking to a criminal who has killed multiple people in
 24 my life and attempted murder of me twice.
 25 Okay?

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1 MR. SOFOS: Next question.
 2 THE WITNESS: So that's who I am talking to.
 3 So you come close to any of my family --
 4 MR. SOFOS: Next question.
 5 THE WITNESS: -- you come remotely to any
 6 questions, all you will get is vitriol and threats,
 7 which I will make -- which I will realize. You feel me?
 8 BY MR. DORDICK:
 9 Q Is it -- I mean, you understand that you come
 10 close to all of my --
 11 A Yeah, I understand. Shut your fucking face.
 12 Don't you fucking say you understand or be in any kind
 13 of way try to belittle me.
 14 All right. Because I'm fed up of your
 15 arrogance. I'm fed up with your extortion, your
 16 criminality. And, most of all, I -- your -- your --
 17 your stupidity. Because only stupid people do what you
 18 do. Do you realize that?
 19 Q Are there any accommodations I can provide to
 20 you today as a result of your brain injury that would
 21 make this easier on you?
 22 A Yeah.
 23 Q Well, what --
 24 A You could die. You could fucking die along
 25 with the rest of your fucking family who is a bunch of

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1 criminal douchebags who I swear to God, I will watch go
 2 behind bars. Because what you do is so wrong. You need
 3 to be behind -- you need to be more than be behind bars,
 4 you need to be executed for what --
 5 MR. SOFOS: Alki --
 6 BY MR. DORDICK:
 7 Q Would you agree with me --
 8 A -- you do because of your criminality.
 9 Because of your fucking criminality you have ruined the
 10 lives of so many innocent people. Just my employees
 11 alone, you have ruined their lives.
 12 MR. SOFOS: That's --
 13 THE WITNESS: How do you feel about that?
 14 BY MR. DORDICK:
 15 Q Is it possible that your financial
 16 mismanagement of the company is the reason their lives
 17 are ruined?
 18 A Sir, I am running a green economy -- I'm
 19 running a green economy program for an entire nation. I
 20 would shut the fuck up.
 21 Q Which -- which nation is that?
 22 A Antigua and Barbuda, as well as other
 23 Caribbean Nations. Plus now, the Nation of Brazil. I
 24 am running a giant green economy program, which would
 25 make your mind blow. I tell you, bro. Because you know

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1 why, because I came to Antigua and Barbuda because
2 I felt safe here --
3 Q Sir --
4 A -- I knew here my --
5 Q Mr. David --
6 A -- inlaws would protect me. And guess what, I
7 decided to give back. I said, you know what, I'm not
8 going to let these fucking people upset me. I'm going
9 to give back to humanity. So I decide to folks on
10 building a green economy platform that the world now
11 is -- guess what, do you know who my partners are right
12 now? You want to know who my partners are?
13 The Crowned Prince of Saudi Arabia --
14 MR. SOFOS: Alki --
15 THE WITNESS: -- the U.S. Government, the U --
16 the Environmental Protection Agency, that is a United
17 States Government has now mandated that I build 300
18 petroleum -- vegetable diesel petroleum manufacturing
19 plants around the country in partnership with my homies
20 right here in Antigua and Barbuda.
21 So ask me your financial mismanagement, shut
22 the fuck down, pipsqueak.
23 BY MR. DORDICK:
24 Q Have you ever been convicted of a felony?
25 A Felonies mended and I stand very proudly by

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1 them because I'm an advocate for cannabis and for the
2 goodness that it does. I have never been convicted of
3 any criminal wrongdoing anywhere in my life because
4 there is none.
5 Q I'm confused. Have you been convicted of a
6 felony?
7 A Felony is not a crime, dickbag. Did you know
8 that?
9 Q I'm almost certain a felony is a crime.
10 A Well, are you? Are you almost certain? I
11 think the abuse of -- I think the abuse of the status of
12 felony is a crime, but I don't think a felony is a
13 crime.
14 Q What felony convictions do you have and when
15 did they occur?
16 A Parking. Parking, uh, in the United States.
17 I think it's parking and anger management, which was
18 then thrown out by the D.A..
19 Q Parking?
20 A Actually, true. Yeah. The D.A., the District
21 Attorney threw out my -- um, I can't even remember what
22 it was. It was something about -- um, what was it that
23 I -- oh, yes. Oh, yeah. Oh, yeah. Oh, yeah. A server
24 processor broke into my home, broke into my fucking home
25 with a mask on him, right, not saying -- identifying

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1 himself, right. And so I grabbed him and threw him out
2 of my house, called the police. Then he -- then he
3 turned around and said that I attacked him.
4 I went to court over it. I even did six hours
5 of anger management over it. And then when I went to
6 court over it to argue it, the D.A. threw it out.
7 So the answer to your question is, I don't
8 think I have a felony other than cannabis. Uh, it
9 wasn't even a felony; it was a ticket. So, no, I don't
10 have a felony in that one.
11 I think the only felony that I have is
12 contempt of court, actually. I think, because
13 everything else was kicked out. So, yeah, I think the
14 only thing that I have is that six days of contempt of
15 court. So go fuck yourself. How about that?
16 Q What about when you were arrested with a
17 private airplane full of marijuana?
18 A Where?
19 Q I believe -- was it St. Kitts?
20 A That's right. That's not in the United
21 States. I thought this was a state court. But, yeah,
22 in St. Kitts. And it wasn't marijuana. Do you know who
23 said marijuana? Nathan Goldberg said marijuana. It was
24 CBD flower, which was completely legal at the time. And
25 at the time that it was on -- at the time it was seized,

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1 it was seeds and seedlings that hadn't flowered.
2 And under British Law, which this thing it
3 was, as you can clearly see, I paid the misdemeanor
4 filed for arguing with people, not for the wrongful
5 trafficking of a controlled substance.
6 So -- so to go to your thing, it was -- first
7 of all, it was not marijuana; it was CBD flower. CBD
8 flower, which under the form bill in the United States
9 is 100 percent legal --
10 Q Did the --
11 A -- anywhere in the United States.
12 Q Did the Plaintiff go to -- with -- to Greece
13 at any time?
14 A No. She came to Greece --
15 Q Okay.
16 A She came to Greece on her own recognizance.
17 She came to Greece after she lied and said she had some
18 deal in Lebanon. And she said she wanted to stop by
19 Greece to see me. She stopped by Greece to see me and
20 she left. I -- you know, with zero -- almost zero
21 contact with her. She came, hello, she enjoyed a place
22 and then she left.
23 And you fucking guys tried to turned it into
24 something. Are you fucking kidding me? You lying sack
25 of shit. She came to Greece lying about a deal and then

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1 came -- flew to Lebanon freely on my dime, stopped by
2 Greece. You know, again, it was more of this attempting
3 to get with me. And then she left, okay. End of it.
4 She flew to Greece on her own recognizance. She made up
5 the whole story.
6 Okay. Next question.
7 Q Did she stay with you while she was in Greece?
8 A Not with me; she stayed in her own room in --
9 in my villa that I have now lost to my cousin, who
10 fortunately bought my family home, right, because of
11 wrongful fights that I have had to get into. But in a
12 few months, I get my -- I get that house back. And all
13 these people go to jail. Just -- less than a year,
14 you're in prison. I guarantee. Less than -- less than
15 12 months from today, you're in prison.
16 Q And if not?
17 A And if not, you will be looking at an
18 indictment, for sure. I -- I -- I -- I promise you. I
19 promise you. You will be looking at an indictment in
20 Antiqua, in London, in Greece, as well as in the United
21 States. I promise you.
22 Q Uh --
23 A I give you my word as a human being and as I
24 stand here on record with my hand to God that you are
25 going to end up being indicted. I promise you. In some

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1 country that you and your syndicate have effected my
2 jurisdiction, you will end up on Interpol's list for
3 your corruption.
4 Okay?
5 Q Mr. --
6 A I promise you. Hand on heart, Mr. Dordick. I
7 promise you.
8 MR. SOFOS: That's enough, Alki. Thank you.
9 You don't need that. Next question.
10 BY MR. DORDICK:
11 Q My question, where -- where did Ms. Nichols
12 sleep with -- when she came to Greece?
13 A I just don't know. I can't remember. I think
14 one of -- oh, one of the guest rooms. I don't know.
15 Q Did she sleep in your room at any time?
16 A No, she did not.
17 Q Did she sleep in your bed at any time?
18 A No, she did not.
19 Q Did you ask her to give you a massage at any
20 time?
21 A I don't -- I don't -- you know what, I don't
22 think so. No. You know what, this question has been
23 brought up over and over again. And it's like some kind
24 of trick question. I don't think so. I don't know.
25 Maybe, maybe not. I don't know. I don't know. It's

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1 some kind of trick question because this is what you
2 guys do.
3 So, you know -- you know, Margarita is an
4 attractive girl. And I have always thought -- always
5 thought that maybe -- maybe there is something there.
6 But it just never happened. And then that one time that
7 we got together, I realized this is -- just not the
8 woman for me.
9 So this is -- this is how -- this is my view
10 of the world, sir. And your attempts to ruin a very,
11 very -- you know, I think uh, uh, uh, a very sound
12 healthy world. Perhaps the reason that you choose me
13 is -- for your comment -- your comment, debt to be
14 settled. I think you and your family are going to rot
15 in a way that you can't even proceed.
16 Do you know you don't have insurance? Has
17 your father told you that? Do you remember that L.A.
18 Times article about Dordick Law not having insurance?
19 Do you remember that? That was quite recent. That was
20 about, what, about seven months ago?
21 MR. SOFOS: Off the subject, Alki. Next
22 question.
23 THE WITNESS: Yeah. No, it's not off the
24 subject. Because what he is doing then would be a
25 crime.

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1 BY MR. DORDICK:
2 Q Do your -- do your companies have insurance?
3 A Uh, at the time that -- you know, you want to
4 know something? You want to know something interesting?
5 The time that all this started, I did have insurance and
6 I can't remember who it was that tried to claim on
7 insurance. And I said, you know what, fuck them. I
8 don't want them to touch insurance. I don't want to
9 settle anything.
10 So I -- I -- you know, there is insurance.
11 There is plenty of insurance out there. But you know
12 what, you're fucked. You're so fucked. Thanks for
13 bringing that one up.
14 Q That is to say you have an insurance policy
15 with which -- which makes -- provides coverage for this
16 incident and you're refusing to turn that information
17 over?
18 A There is no incident. There is just made up
19 lies by you.
20 Q Do you have an insurance policy in place, at
21 either FilmOn.TV or Hologram U.S.A. that may provide
22 coverage for the alleged incident that --
23 A Absolutely -- absolutely not. Absolutely --
24 absolutely not. Absolutely no fucking way.
25 Q You do -- you did or did not have insurance?

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1 A Can you move on to the next question? I
2 already answered at. Stop being an idiot.
3 Q You just said -- you just said absolutely not
4 when I asked if you had insurance and previously you
5 said you did. So I just need to know, do you or do you
6 not have insurance that may provide coverage for the
7 incident?
8 A Think about your fucking question, you idiot.
9 Think about what you just said to me. Think about what
10 you just said. You said, think have insurance. Yes, I
11 did have insurance. Now I do not have insurance, no. I
12 do not. Why? Because I don't have any employees in the
13 United States. Why? Because of your corruption.
14 Q Okay. Who was the name of the insurance
15 company?
16 A Go fuck yourself. Limited.
17 MR. SOFOS: Alki --
18 BY MR. DORDICK:
19 Q I'm not aware of that insurance company. Is
20 there another one that --
21 A Yeah. Well, you have to look -- you will have
22 to look it up.
23 Q All right. Give me one second.
24 So I cannot find a Go Fuck Yourself Limited
25 Insurance Company. Is there another one it might be?
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1 A Well, you didn't look hard enough. Keep
2 looking.
3 Q Is there another insurance company that --
4 that it might be?
5 A Then -- then -- then I -- I don't know. I
6 really don't know. I don't know what the insurance
7 companies names were. I really don't. I can't
8 remember.
9 Q So this company, FilmOn.TV, you said it makes
10 millions of dollars in revenue?
11 A Oh, yeah. It makes millions of dollars every
12 month.
13 Q And that's without any employees?
14 A Not in America.
15 Q So does it make any revenue in --
16 A Not in -- not in your jurisdiction, dickhead.
17 Not in the fucking same jurisdiction that you think --
18 you think that you're safe in. You are not safe, son.
19 You're going to jail. You really are, I swear -- I
20 swear to you. Please read the writ at your lunchtime.
21 Read the writ and enjoy it. Please read it.
22 Q You --
23 A In fact, why don't you have your assistant
24 read it while you're asking me questions so you can --
25 see by the reaction on their face what is going down.
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1 Q Was this writ prepared by you?
2 A No. It was prepared by -- are you ready for
3 this? A King's Council, a -- a law professor in
4 New York at Pace Law school, a, uh -- a, uh, uh,
5 Barrister here in Antigua, three lawyers in Los Angeles,
6 two lawyers in Dallas -- in a -- in Dallas, Texas, all
7 researching the criminal syndicate that you are a part
8 of. That doesn't include all of their assistants, by
9 the way. And that certainly doesn't include all of the
10 other douchebag law firms that employed in the past,
11 including, um, the law firms that are now coming to
12 speak against the very same judges that are named in
13 that writ.
14 Lawyers -- the lawyers from big law firms in
15 Los Angeles are coming in my support to talk about
16 what's in that writ and to talk about the criminal
17 douchebags that are -- that are part of this syndicate,
18 which is you and your entire fucking family.
19 Q Sir, is it a true --
20 A Read the writ and shut up and don't ask me any
21 questions about it. Just read the writ.
22 Q Isn't it true that you have stated that
23 claims that you are a billionaire are greatly
24 exaggerated?
25 A That's true.
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1 Q Is there a reason why in the writ then that
2 you mention to yourself that you are a billionaire
3 businessman even though --
4 A Oh, so you did read the writ. So you did read
5 the writ. Okay. Good. So next question.
6 Q Yeah. My question is, why would you put in
7 the writ that you were a billionaire if you know that to
8 be --
9 A I -- because it's in parenthesis as an
10 internet billionaire, as a U-tube billionaire. And
11 guess what, technically at one point, I was a
12 billionaire.
13 And guess what, your defamation that I, very
14 famously, fought back in FilmOn versus Double Verified
15 and now will famously fight back in this current writ,
16 um, clearly shows who is behind the lies and deception
17 to try and defame and extort my companies and then me.
18 Q Do you practice yoga, sir?
19 A I do.
20 Q Breathing exercises?
21 A I do. For decades, actually.
22 Q If you ever need --
23 A So --
24 Q -- we will be -- we're not -- we have got
25 awhile to go, so, you know --
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1 A Would you like to learn some breathing
2 techniques? You're going to have to learn them when
3 you're in jail.
4 Q Sure.
5 A Breath in; why did God put me on this earth;
6 breathe out. That is what you are going to be asking
7 yourself late at night soon. I promise you.
8 Q Do you -- do you find it appropriate for a
9 boss to have sex with his employees?
10 A What are you talking about? What are you
11 referring to?
12 Q Do you -- do you find it acceptable at a
13 company that you own or operate for a boss to have sex
14 with one of his employees?
15 A Well, if they're married or if they're dating,
16 I don't see that is wrong, no. Many couples work
17 together in the same company.
18 Q And if not married or dating?
19 A I don't -- I mean, personally? Emotionally?
20 Spiritually? I don't know. I think it's a case by case
21 issue. Legally? I don't know. I don't think so. I
22 think in California -- in California, for example, I
23 know that it's wrongful for a boss and an employee under
24 state legislature, yes.
25 Q Do -- do you believe there to be an inherent
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1 power dynamic imbalance between you and the Plaintiff in
2 this case?
3 A What does that mean?
4 Q At the time that you knew her and were working
5 with her, that there was a -- in the relationship an
6 inherent imbalance in power; you having control over her
7 and she not having control over you?
8 A I don't even know what that means. Control
9 over what?
10 Q Whether or not she was --
11 A What control? Controls over what issues?
12 Q Whether or not she was able to feed her family
13 based on receiving a paycheck from you.
14 A She wasn't an employee. What are you talking
15 about?
16 Q Yeah. At no point in time was she an
17 employee?
18 A Yes. At -- years previously, yes. At another
19 company that was not operating.
20 Q Which company?
21 A Which was Alki David -- which was Alki -- I
22 believe, Alki David Productions. I believe.
23 Q And what did Alki David Productions do?
24 A It produced content for the streaming website
25 FilmOn.TV and also content for the Hologram Company.
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1 Q Like what type of content?
2 A Different types of content.
3 Q Like --
4 A Whether it was -- whether it was Jimmy Kimmel
5 at the -- at the billboard awards or whether it was
6 Shockya content for FilmOn or whether it was branded
7 content for a -- for an advertiser. You know, it
8 varied. We have thousands of different content options
9 on FilmOn.
10 Q And do you still produce content for -- for
11 FilmOn?
12 A Right at this very moment, uh, yeah. I
13 suppose you could say that, yeah. Sure. Sure, of
14 course.
15 Q What was the most recent thing you created?
16 A Oh, the most recent thing is actually a
17 documentary about this very, very subject that I'm in
18 right now, which is in a deposition by a corrupt
19 syndicate of criminal Hollywood douchebags that have,
20 you know, corrupted society for a very long time. And
21 these people are now going to go to jail. That's what
22 the documentary is about.
23 Q Is -- is it in production currently or has it
24 already been made?
25 A No. It's in production as we go.
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1 Everything -- you can see bits and pieces of it on
2 U-Tube. You can see me berating Gloria Allred or the
3 State Bar or -- or the -- or the, what do you call the
4 Malibu, um -- what is it called? The Lost Hills
5 Sheriff's Department that is -- that -- that -- um, you
6 know, any of these -- any of these people in this tiny
7 little circle of corruption.
8 Anyways, so go on. What is your next
9 question?
10 Q When -- was it -- is it your testimony that
11 the Plaintiff asked you to come to Greece to visit?
12 A Excuse me?
13 Q Is it your testimony that the Plaintiff in
14 this case had requested of you that she come see you in
15 Greece?
16 A Of course, she did.
17 Q And why is it that you did not deny that
18 request?
19 A Because she said that she was going to Lebanon
20 to stop to do a deal with MIV. And she said that she
21 wants to come see me before going to Lebanon.
22 And I said, sure.
23 Q And then you offered her a place to stay?
24 A Well, I mean to come out and see me, you have
25 to trek out to an island, so, yeah, of course I did.
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1 THE COURT REPORTER: You have to trek out to
2 where?
3 THE WITNESS: To an island.
4 THE COURT REPORTER: Thank you.
5 BY MR. DORDICK:
6 Q And this island, is it -- is it entirely owned
7 by yourself or your finally?
8 A No. Sadly -- sadly for you -- you've -- you
9 know what, you really disgust me as a person. You
10 really, truly, disgust me as a human being. Because you
11 sit there with, you know, this arrogance while also
12 knowing very well what your dad does. You know what
13 your father does. You know the real corruption of the
14 cesspool that you're involved in. You know how it
15 operates. You really know so don't play stupid.
16 Q Is -- is the entire -- is the entirety of --
17 of that belief based just on your case?
18 A No. It's based on Rose McGowen who reached
19 out to me and said the same thing. Based on --
20 Q Of my father?
21 A Sorry?
22 Q Of my father?
23 A Well, certainly -- certainly -- not of your
24 father in this particular case but certainly of -- of
25 the same syndicate of Lisa Bloom; certainly of -- of --

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1 of Gavin Newson's wife, Siebel Newson definitely; of --
2 of, what is his name, Harvey Weinstein, definitely; of
3 Gloria Allred, 100 percent, yes.
4 Q Okay. So is it fair to say the only knowledge
5 you have of my father comes from this case?
6 A No. I have plenty of knowledge about your
7 father from whistleblowers who are written in the writ.
8 Q From -- about other cases?
9 A Yeah.
10 Q All right.
11 A I mean, another -- another -- another example
12 would be the Alec Baldwin case where your dad and Gloria
13 Allred collaborated on. That's another great example.
14 Q Where Alec Baldwin shot and killed somebody
15 with a gun?
16 A Yeah. Yeah. Yeah. Well, whatever -- listen,
17 whatever he did it doesn't matter what he did in this
18 particular case. Because what is happening is your dad
19 and Gloria Allred, who have fixed in numerous cases
20 together along with Nathan Goldberg, fixed and there is
21 plenty of evidence to that effect.
22 There are thousands of lawsuits out against
23 Girardi Keith. A lot of which implicate Nathan
24 Goldberg; a lot of which implicate Gloria Allred; a lot
25 of which implicate Michael Maroko; a lot of which

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1 implicate Gary fucking Dordick. And you know what I'm
2 talking about, son.
3 MR. DORDICK: Gary fucking Dordick, yes.
4 Mr. David, the court reporter here can type up
5 to 200 words a minute, and she is very skilled but they
6 do need breaks from time to time because of the -- the
7 difficulty and --
8 THE WITNESS: Well, I am sorry -- I'm sorry if
9 she cannot handle the speed at which I speak --
10 MR. DORDICK: No. My question is, would
11 you -- would you be okay with providing her with five
12 minutes to stretch, if you don't mind? We will come
13 back in five minutes and she can --
14 THE WITNESS: No. Absolutely not. We
15 carry on. Are you fucking kidding me? Why waste my
16 time. Sorry. You get a court reporter that can type
17 fast enough next time. Sorry. Carry on.
18 MR. SOFOS: Pardon me, Alki --
19 MR. DORDICK: If you can --
20 MR. SOFOS: Alki --
21 THE WITNESS: Fuck no. Fuck no. Fuck no.
22 You aren't going to get me and then tell me to fuck off.
23 Fuck you.
24 MR. DORDICK: Mr. David --
25 MR. SOFOS: Alki --

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1 THE WITNESS: You want me to -- you want -- if
2 you want this to carry on, you carry on. If not, you
3 shut the fuck up and we end it now. How about that?
4 Don't waste my time.
5 MR. DORDICK: It's -- it's -- it's physically
6 extremely difficult on her. And I'm not going to be
7 putting her through physical torture because you cannot
8 give her --
9 THE WITNESS: Well then, if you're going to
10 put her through physical torture, then we end -- end --
11 end the session and then come back to when you're ready
12 without -- with somebody who is able to type reasonably
13 enough.
14 MR. DORDICK: Mr. David, it's a physical
15 limitation on -- on a human being.
16 My question, are you refusing to take an
17 admitted break --
18 THE WITNESS: No. I'm not. I'm not refusing
19 anything. I'm just saying, if you choose to take a
20 five-minute break, I may not come back.
21 MR. SOFOS: Mr. Dordick, five-minute break.
22 Thank you.
23 MR. DORDICK: Yeah. Sure.
24 THE WITNESS: No. No. No. No. Please
25 Mr. -- don't fucking humiliate me anymore than these

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1 fucking people --

2 MR. DORDICK: You should be respectful and he

3 deserves your respect because he is --

4 MR. SOFOS: Alki --

5 THE WITNESS: Oh, shut up you insolent little

6 brat, shut your fucking month. You are going to go to

7 prison, you piece of shit.

8 MR. DORDICK: Mr. David --

9 THE WITNESS: Listen. Listen. For the

10 lady -- for the lady court reporter, and only for the

11 lady court reporter, I am going to -- you know, I'm

12 going to be patient for at least a couple of minutes

13 while she relaxes and we can talk.

14 So if the lady -- we are now off the record

15 and -- and the lady court reporter may relax and when

16 she is ready to come back, she can let us know when she

17 is ready to come back.

18 MR. DORDICK: We'll take a five-minute break.

19 THE WITNESS: Up until that point, I will very

20 happily berate you.

21 Is that okay?

22 THE VIDEOGRAPHER: Okay. We're off the

23 record. The time is 11:20 a.m. pacific time.

24 (A short recess was taken.)

25 THE VIDEOGRAPHER: We're on the record. The

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1 time is 11:27 a.m. pacific time.

2 Counsel, please proceed.

3 BY MR. DORDICK:

4 Q Sorry, Mr. David. You can continue.

5 A Continue what?

6 Q Okay. Um --

7 A What would you like me to continue? Sorry.

8 What are you suggesting?

9 Q I just -- I don't want to interrupt you. I

10 want to make sure --

11 A No. No. No. What were you trying to -- were

12 you trying to coerce something or what were you trying

13 to do? Because that seems to be all part of your

14 efforts of just -- you know, the lady has recanted

15 twice. You were sanctioned. I don't know about you

16 personally but certainly your father was sanctioned for

17 lying to the court. How about that?

18 Q I -- I don't know. I'm unaware of what -- of

19 what you're --

20 A Well, it's published so you can read about it.

21 Q Um, have you had sex with any other of your

22 employees?

23 A Other than Mary Rizzo, no.

24 Q Did you have a rape room at your theater?

25 A No.

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1 MR. DORDICK: All right. I'm going to -- I'm

2 going to attach as Exhibit 1 to the deposition -- this

3 is a -- a video. Give me one second here.

4 (Whereupon Exhibit No. 1 was marked

5 for identification.)

6 BY MR. DORDICK:

7 Q Um, do you have the ability to -- to view

8 videos? I'm going to share my screen here and let me

9 know if you're -- if you're able to see it, okay?

10 Okay. I'm -- I'm going to play this video and

11 if you can just listen to it.

12 THE VIDEO RECORDING: "Yeah. You should

13 see -- you should see upstairs. Upstairs is like a real

14 rape room. Yeah. The real -- the real deal."

15 BY MR. DORDICK:

16 Q What did you mean by you -- you have the -- a

17 real deal rape room upstairs?

18 A Uh-huh, that was a joke. And that was not an

19 office; that was a house. That was a private residence

20 -- that was a private residence and that was a joke.

21 I -- and last time I -- last time I heard we were --

22 lived in a nation of first amendment rights to be able

23 to say all kinds of jokes. And even -- and even say --

24 even say things like, I'm going to crucify those Jew

25 bastards who are extorting me. I can say things like

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1 that. Did you know that?

2 Q Do you harbor --

3 A By law -- under law, it is my right to be able

4 to freely speak my mind and my feelings and my thoughts

5 in any situation, actually. Even -- even to coerce

6 something, such as a right. It is still my right to say

7 whatever I want out of my mouth.

8 Q All right. So to be clear, you -- you do not

9 have a real rape room?

10 A Of course not. How ridiculous a question is

11 that?

12 Q I -- I don't know. So that was a joke?

13 A Obviously, it was a joke. And anybody who

14 knows me knows very well that I'm a jokester. And

15 everybody that knows me very well knows that I am a

16 gentle decent loving man who has plenty of loving

17 relationships with kind decent people that I like to

18 surround myself with.

19 But then when I'm in the den of iniquity and

20 with -- and in front of douchebags like you, fuck you.

21 How about that?

22 Q Were you also joking when you called me a Jew

23 bastard?

24 A Listen, I have many Jewish friends. My sister

25 married an Israeli. I have -- I have many, many Jewish

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1 friends. I love the Jewish religion. But I used it as
2 a derogatory term to get to you personally.

3 Q Did you ever send any videos to the Plaintiff
4 in this case potentially threatening her to get her to
5 settle the case?

6 A I sent her videos telling her what was going
7 on. They weren't threatening videos. Why do you think
8 the lady has recanted? Because -- why do you think she
9 decided to tell the truth? Why when she went then to
10 see, uh -- uh, Tom Girardi she said -- apparently she
11 said -- these are her words, right, that -- she said,
12 "Oh, as long as Mr. David doesn't get in trouble and I'm
13 getting money, that's okay."

14 All right. So from then on, she has retracted
15 everything to many people, including myself well before
16 me sending her any messages years later when she is
17 still got me connected to her WhatsApp. I looked to see
18 if her WhatsApp is connected. Years later, I send her a
19 message saying -- you know, telling her what my plan is
20 to crucify you people for your wrongful criminal
21 activities.

22 MR. DORDICK: I'm going to attach as Exhibit 2
23 to the deposition, Mr. David. Here is another video.

24 (Whereupon Exhibit No. 2 was marked
25 for identification.)

1 like to show you. I will mark it for identification,
2 Plaintiff's Exhibit 3.

3 (Whereupon Exhibit No. 3 was marked
4 for identification.)

5 THE VIDEO RECORDING: "Hello Rita. I wanted
6 to catch up with you and see if we can have a
7 conversation or just confirmation by text for the
8 following. I can have, um, a liaison -- I have got a
9 liaison friend of mine, a former head of the CIA desk in
10 Athens, who can arrange a lawyer in Beirut or whatever
11 town you are in. And they can meet with you and you can
12 have your lawyer present, as well. This can be done in
13 English and in Arabic and in French, whatever language,
14 and we can sign an agreement. And I agree in this video
15 now that I won't hold you liable for any of this. I
16 spoke to my attorney, Alan Dershowitz, who is a famous
17 attorney, you can look him up. And he also agreed that
18 nobody ever got punished for recanting. So I will
19 accept your -- I will accept the okay with you that you
20 recant your allegations to my lawyers. And I will take
21 care of you and any reprisal from your lawyers. You
22 have my -- my promise."

23 BY MR. DORDICK:

24 Q And -- and what was that?

25 A So four of my lawyers are dead; one is in

1 THE VIDEO RECORDING: "Hello Rita. I hope I
2 find you well where ever you are. I think you're in
3 Lebanon. And I hope you're having a decent time there.
4 Um, I was hoping we could talk or, uh, come to
5 resolution between this so that -- so that, you know,
6 life can continue in a -- shoosh. See, it was a
7 rough -- it was a rough time recently, so I thought
8 about being more sensitive and maybe some -- reaching
9 out and seeing if we can, uh, find some way to, uh,
10 settle our lives."

11 BY MR. DORDICK:

12 Q What did you mean by that?

13 A What I meant was that I would like her -- like
14 her to -- to not feel -- I -- I was telling her that she
15 doesn't need to feel frightened of me. She didn't need
16 to feel frightened of me that I would come after her,
17 uh, for what she did. And what she did she knows is
18 wrong. And I wanted her to know that somebody who
19 recants doesn't get into trouble. Somebody -- why do
20 you think I left her off this writ? Because she has
21 recanted twice and you guys have maintained her --
22 harassing her. And I'm there trying to speak gently to
23 try and let her understand that I'm not going to
24 prosecute her as I'm going to prosecute you.

25 MR. DORDICK: I have another video I would

1 hiding because of this syndicate. This woman is
2 terrified. Why do you think she hasn't turned up to
3 court? Why do you think she flat out refused to talk to
4 your law firm? Why do you think? Because she is
5 terrified. Because she knows -- like all your other
6 people that you take on pro bono, whatever the fuck it
7 is that you do, you keep them locked up and threaten
8 them with all kinds of billings and -- and financial
9 burdens that they're terrified of. So I was saying to
10 her that I will protect her from you is what I was
11 saying.

12 Do you understand me?

13 Q If she -- if she drops her lawsuit against
14 you?

15 A No. No. I don't care about her lawsuit
16 against -- I don't care about you. I care about me
17 being able to put you in prison. Well, not you, I don't
18 give a fuck about you. It's what you do in your
19 activities that I'm going to fucking crush. Do you
20 understand me?

21 Q Sure. Um, when -- when you had intercourse
22 with the Plaintiff, what indicated to you that she was
23 consenting to it?

24 A She pulled down her pants so I think that was
25 quite -- quite leading, don't you? Well, she -- she

1 rubbed herself up against me. What else would you like?
2 I mean, what other -- and -- and also she had been
3 living in my hotel room for three or four days, whatever
4 it was, trying to get into my bed and me saying no, go
5 sleep in the other room or sleep on the couch or
6 whatever. So that's what.
7 Q Did she ask to come to your --
8 A That's -- that's what led -- that's what led
9 me to believe. And years of her attempting to get with
10 me prior to that led me to believe. That's what led me
11 to believe. Is that what you're asking?
12 Q Did she request to come to your hotel room or
13 did you ask her to come?
14 A She came -- she came to my hotel room with a
15 friend and moved in. She actually didn't even come to
16 me. She came with my son. She came with my son from
17 the theater and their friends and she stayed after
18 everybody left. And then she stayed two or three days
19 longer. And there is plenty of witnesses to that.
20 Q And --
21 A So I don't know what the fuck you are talking
22 about.
23 Q Which son?
24 A You know what -- you know what? I'm going to
25 tell you, I take the 5th because in fear of my children.

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1 Because you are a corrupt criminal douchebag that works
2 for a criminal syndicate that kills people.
3 Okay. And you are -- you are part of a very,
4 very disgusting group of people that are going to go to
5 prison.
6 MR. SOFOS: You don't need --
7 THE WITNESS: So if --
8 MR. SOFOS: Alki, you don't need that. Please
9 reply to the question. Next question. Thank you.
10 THE WITNESS: Well, what are you -- what are
11 you talking about? Which bit is not right? The bit
12 that I called him a criminal cunt.
13 MR. DORDICK: Mr. David --
14 THE WITNESS: Ha ha ha ha ha ha.
15 BY MR. DORDICK:
16 Q Um --
17 A Ha ha ha. You're really fucking funny, aren't
18 you, douchebag. You're going to prison. You are on
19 your way to prison. Do you understand? Keep asking the
20 questions.
21 Q Would your son be able to corroborate the
22 consensual nature of your relationship with the
23 Plaintiff?
24 A Probably, I don't know. Probably -- probably,
25 I don't know. Yeah. I'm sure. Everybody who went to

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1 the theater saw what Margarita was like. She was always
2 all over me. Always all over me.
3 Q And who are the people who could provide that
4 corroboration?
5 A Loads of people. For example, the photo -- in
6 the photograph, for example, that we have where a month
7 after the alleged incident she shows up to the theater,
8 the very same place, with a big ass birthday cake saying
9 I love you, Alki and blah, blah, blah, or you are the
10 best or whatever and a big cake for my birthday.
11 She discovered that I was on the plane to
12 Greece with -- and I had reunited with my -- my
13 girlfriend that I had been apart from -- and they're
14 both Muslim woman. No, I'm sorry, Margarita is a
15 Christian -- Greek Orthodox Christian -- Russ- -- Greek
16 Orthodox Christian, but they're both Islamic women.
17 They live -- they both live in the Middle East, sorry.
18 And they both share similar -- very, very similar
19 values. And -- and, um, she was mad. She was very
20 angry that I got together. And -- and that is what
21 happened. This is a woman who was really pissed
22 off that got talked into joining a very corrupt group of
23 lawyers, such as yourself and your father, and the rest
24 of them.
25 Okay. That's what happened.

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1 Q My question is, but what individuals could
2 corroborate the consensual --
3 A I told you everybody that is in the picture in
4 the fucking photograph of Margarita Nichols and --
5 and -- and all of the employees of mine that were there
6 working at the CBD flower company. I repeat CBD flower
7 company that you continually try to malign. Like you,
8 yourself, try to malign by saying marijuana when you
9 know full well that it was hemp, you lying sack of shit.
10 Q You do not smoke marijuana?
11 A Sometimes. Sometimes I will smoke marijuana
12 but most of the time I smoke CBD flower, which I like.
13 Q And that does not intoxicate?
14 A Are you an idiot? Do oranges intoxicate? I
15 suppose to some degree, the Vitamin C does. But CBD
16 flower under the farm bill is a non-psychoactive
17 compound that is, uh, freely available in all markets.
18 Q And you consume that by smoking it?
19 A Yes. It's called CBD flower. It's called
20 hemp. Hemp, H-E-M-P.
21 Q What are the names of the individuals who
22 could corroborate the consensual nature of your
23 relationship?
24 A I will come back to you with a list, if you
25 wish. I can't remember the names.

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1 Q Do you remember the names of any employees you
2 have had at any point in time for FilmOn.TV in
3 Los Angeles?
4 A Well, obviously.
5 Q Who would those be that you can recall?
6 A In what case? In which sense? In what part?
7 I mean, there were a lot of people that had jobs once
8 upon a time until your people -- until your criminal
9 actions destroyed so much. And you are going to be --
10 you know, I can't wait to -- oh, my God. I can't wait
11 to take you down, Dordick, I really can't. It will be a
12 pleasure to see you crushed, it really will, because you
13 are such a criminal little fuck. You really are.
14 MR. SOFOS: Alki, next question.
15 BY MR. DORDICK:
16 Q You just met me today, true?
17 A I don't need to know anything more than this.
18 If you're aligned with Gary Dordick, I don't need
19 anything more. If you're sitting here taking my
20 deposition and asking the kind of questions that you
21 have asked, knowing very well what my position is and
22 for whatever record you wish to try and create, you are
23 asking very, very inflammatory questions with no
24 jurisdiction and under circumstances that I have
25 outlined to you are an act of white-collar criminality

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1 that you will go to jail for.
2 Q Are you aware of an individual by the name of
3 Ashley Giselle, G-IS-E-L-L-E, Husa, H-U-S-A?
4 A Ashley Giselle? Ashley was one of the
5 dancers.
6 Q Was she an employee at FilmOn.TV?
7 A Uh, no. She was -- she wasn't an employee,
8 no.
9 Q How about any of the Hologram companies?
10 A Uh, she -- she came and danced a few times so
11 she wasn't an employee; she was a dancer.
12 Q And -- and did you -- and not pay her for her
13 work?
14 A No. I believe she was paid. I don't believe
15 she was not got paid.
16 Q Okay. Did you have anybody at FilmOn.TV or
17 Hologram USA who was in charge of compliance to ensure
18 that you were -- that your company was paying your
19 employees appropriately?
20 A I didn't have employees to pay at the time
21 that you're talking about.
22 Q From what year to what year did you have
23 employees at FilmOn.TV?
24 A I can't remember.
25 Q From what year to what year was FilmOn.TV an

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1 active corporation in the State of California?
2 A I can't remember. And, by the way, my head
3 now -- I have had enough time. I can't do anymore of
4 this bullshit. You're just fucking full of shit.
5 You're just a lying -- you know, have you got any -- any
6 real questions? Do you have any real questions that are
7 not made up? Do you have anything more than this
8 because I'm -- I'm kind of done.
9 Q I mean, there is plenty of questions that --
10 that I have. All of them --
11 A All right.
12 Q -- actually I had to make up because that's
13 how you think of things.
14 A Yeah.
15 Q But --
16 A But, no, we're not talking about the truth
17 behind them and the -- and the -- and the ethics behind
18 them is what I'm talking about.
19 Q Is it true that Margarita Nichols never
20 affirmatively consented to having sex with you with
21 verbal consent?
22 A I don't -- no. No. She -- she was -- she was
23 always -- she was always consensual; 100 percent
24 consensual. There was no --
25 Q What verbal --

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1 A There was no -- there was no ambiguity at all.
2 Zero ambiguity.
3 Q What verbal consent --
4 A Zero. Zero. Zero. Zero. Absolutely zero.
5 When somebody rubs -- when somebody rubs their body up
6 against you and starts removing their pants or is in
7 there in your bed, trying to get into your bed for three
8 days prior to that, I am sorry, that in any planet is
9 consensual.
10 Q That is to say that at no point in time did
11 she ever provide verbal consent for you to penetrate
12 her?
13 A She did. I mean, I don't know if she said put
14 your dick in me. I don't think she ever said that
15 particular thing. But she certainly -- she certainly
16 was very, very -- yeah. No. I mean, I would say that
17 she did say it, maybe not in the words that you might
18 choose. But, yes, she did say it.
19 Q Well, what types of words did she use that led
20 you to believe that she was consenting to have you
21 penetrate her?
22 A Hi, let's be together. Oh, kiss me. Oh,
23 that's good. Oh, okay. Then takes her pants off. Do
24 you think that -- what do you think? What -- how do you
25 have sex with your wife? Do you -- do you write about

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1 it? Do you -- do you prepare -- what is it you do
2 exactly? I don't understand your question.
3 She was completely 100 percent consensual in
4 as much as she came on to me. She came into the room
5 closed the door and came on to me.
6 Okay. That is what I call consensual.
7 Q And this was in the server room?
8 A That I was standing in trying to figure out a
9 problem with one of the computers. And she come -- and
10 I'm there with my dog and she comes in and closes the
11 door, yes.
12 Q Did she try to have sex with you in your hotel
13 room?
14 A Um, no. I don't know if you'd call it that
15 but she certainly wanted to be with me in my hotel room,
16 yes.
17 Q But my question is, why is that she would try
18 to have sex with you at your place of work in the server
19 room and not try to have sex with you in a hotel where
20 there is a bed?
21 A You really are a -- you really do have a -- a
22 passionless kind of existence, don't you?
23 I mean, if the woman chooses to be sexy and
24 come in -- to come and -- and come and jump on the --
25 come and jump on you or make a pass at you in -- in --

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1 in there -- in a place that is, you know, reasonable. I
2 mean, it's not like it's in public. It's not like it's
3 in -- it's not like it's in some place that is filthy
4 or -- or -- or anything like that. So why would -- you
5 know, what is wrong with that? I don't understand what
6 you're suggesting.
7 Q I'm --
8 A She -- the -- the -- the -- you're trying to
9 tell me that the choice of location of having sex in a
10 bed versus somewhere else is an issue. Is that to you
11 an issue?
12 Q It -- it certainly would appear to be related
13 to whether or not she was consenting, wouldn't you
14 agree?
15 A Well, when a woman walks into -- into a room,
16 I would say you are absolutely wrong because when a
17 woman walks into a room, closes the door and begins to
18 undress, having spent three days in your hotel room, I
19 would say that is consensual sex, yes, 100 percent. And
20 I think that if you try to argue otherwise, you are an
21 idiot.
22 Q That's my question. She did not try to
23 undress and remove her pants while in your hotel room,
24 only once in a dark server room with your dog?
25 A It wasn't a dark server room. And -- and my

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1 dog was always there. She virtually -- while she was an
2 employee at FilmOn, she use to walk the dog as a puppy.
3 Every single day she would walk that dog. She knew that
4 dog intimately well. She also knew that dog had three
5 months left to live. She also knew that dog was dying.
6 Okay. So there you are. How do you feel about that?
7 Q All right.
8 A How do you feel about that?
9 Q I have --
10 A How do you feel about that? How do you feel
11 about the knowledge that -- that all of that nonsense
12 that you are now supporting about, um, a crazed dog
13 threatening -- you know, it's just lies. Just lies.
14 Lies upon lies upon lies that you guys are going to have
15 to pay for. Do you understand me? You cannot do this
16 to people and expect to get away with it. Not for any
17 reasonable length of time, sorry.
18 Q Is it possible that your brain injury has made
19 it -- has make you unable to know whether or not the
20 Plaintiff was consenting to sex?
21 A No. I have a very, very clear sense of right
22 and wrong. I have a very, very good understanding of
23 my -- you know, my ethics and my principles I live by
24 and stand by.
25 For example, I maintain my sobriety decades.

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1 Um, I am a very disciplined person, far more so than you
2 ever will be probably because you haven't gone through
3 the hardships that I have gone through as a result of
4 what you have done.
5 Q Did you do a show with Mike Tyson where you
6 extensively discussed your drug use in the last 20
7 years?
8 A Um, sure.
9 Q And it -- how do you square that with your
10 statement that you have been sober?
11 A Well, it's not drugs; it's medicine. And --
12 and that is how I square it, if that's what you're
13 suggesting. I square it by saying to you that medicine,
14 as opposed to recreational drug use, is, uh, two
15 entirely different things, especially when you have a
16 brain injury such as mine.
17 Q What -- what are recreational drug use to you?
18 A Cocaine, uh, used at parties, or
19 methamphetamines used for because of -- of physical
20 addiction or, uh, even -- even the abuse of things like
21 Ketamine, or the abuse of medicinal drugs is -- is
22 another use -- is another -- and by abuse is when your
23 life becomes unimaginable and when you become so --
24 Q Have you -- have you -- or do you recall an
25 evaluation that was done for your -- your brain injury

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1 in this case?
2 A Which one are you talking about?
3 Q There is a doctor that you -- that your sister
4 had referred you to.
5 A Oh, yeah. You're talking about Dr. Wexler?
6 Q Yes.
7 A Yeah. The one -- the one -- the one who very
8 uniquely wrote as a suggestion of Dana Coles, who is now
9 part of that writ that -- thinking that there is a cabal
10 of lawyers allusion, right, and he very neatly wrote
11 that in. And I don't know where the hell that came
12 from. I insisted that the right version of 2.0 when --
13 and I, as a result of that, do not speak to my sister
14 anymore as a result of that. That was wrongful, very
15 wrongful of what happened.
16 And -- and -- you know, I will amend my -- I
17 mean, my relationship with my sister is on the mend and
18 only -- only as a result of our will to mend it, not
19 because of -- you know what? You and your family and
20 what your syndicate have done to me is so wrong and so
21 bad. You really should be ashamed of yourself,
22 Mr. Dordick, you really should.
23 Q My question is, why did your sister refer you
24 to Dr. Wexler?
25 A Because he was referred to by Dana Coles. And

1 Dr. Wexler apparently is the hack that everybody goes to
2 in Santa Monica to get -- to get -- to get brain
3 analysis. And he -- and, you know, the -- you know, as
4 far as I'm concerned, the MRI and the -- and the -- and
5 the -- what do you call them? The -- the technicians
6 and the doctors that I saw later in London and Greece,
7 all of who did the evaluation and the people at the
8 Minnesota -- two clinics in the state, I forget which
9 one it is. Two Minnesota, of course, they evaluated it
10 and they all came up with a -- they all came up with the
11 same conclusions.
12 And Dr. Wexler's conclusion of my brain injury
13 with -- about -- about his lawyers and me feeling is
14 pathetic. It's a pathetic effort. Absolutely pathetic
15 effort. And you know what, let me tell you something.
16 You wrongfully illegally bringing up that
17 doctor, right, despite ADA law, right, you bringing that
18 up further shows the complicity with -- with -- with
19 the -- with the coercion of these events and the
20 syndicated effort to extort. You guys are pathetic.
21 Absolutely pathetic.
22 Q You said there were other doctors who came to
23 conclusions that differed with his?
24 A Not differed. Not differed. Differed with
25 the -- differed with the notion that -- differed with

1 the notion that there is a cabal of lawyers, yes. They
2 will -- they will differ with that. They will say
3 that's nonsense. They have -- they have no idea how
4 that was inserted into it.
5 Q What conclusions did these other physicians
6 come to?
7 A That I have a brain injury; that I am a normal
8 decent person; that when angered, I -- in an enormous
9 Tourettes like way go apeshit and will perhaps anger
10 people, but in no uncertain terms all agree that I have
11 a -- a reasonable mind and body. And, in fact,
12 Mr. Sofos will corroborate that because he was present
13 at one of them.
14 Q Did this ever cause you to berate or yell at
15 employees at FilmOn.TV?
16 A All the fucking time.
17 Q And did this ever cause you to verbally abuse
18 the Plaintiff in this case while she was was your
19 employee?
20 A No.
21 Q Did it cause you to verbally abuse other
22 employees at FilmOn.TV?
23 A No.
24 Q To you is there a difference between verbal
25 abuse and berate-ment?

1 A I'm sorry. Is there a difference?
2 Q Yeah. Between --
3 A I think -- I think -- I think -- I think if
4 you speak English they mean the same thing.
5 Q And so -- so you did or did not verbally abuse
6 any employees at FilmOn.TV?
7 A I don't know what verbally abuse means. Will
8 you give me a definition?
9 Q Berate?
10 A Will you give me a definition?
11 Q Yes. Scream at --
12 A That's not a definition.
13 Q Threaten. Would you like me to read --
14 A These -- these are not --
15 Q -- it for you?
16 A -- definitions. These are words. Would you
17 give me a definition?
18 Q Sure. You would like like a dictionary
19 definition?
20 A I would like you to tell me what you think is
21 verbal abuse.
22 Q It would be to scold or criticize someone
23 angrily. That would be the definition of berate
24 according to --
25 A Then I would say abso-fucking-lutely, yes.

1 When somebody says does something stupid or asinine that
2 is either dangerous or -- or -- or criminal, yes.

3 Q Verbal abuse according to Web M.D. would be
4 emotional abuse ranging from words or behaviors used to
5 manipulate, intimidate and maintain power and control
6 over somebody which can include insults, humiliation,
7 and ridicule, the silent treatment, attempts to scare,
8 isolate --

9 A So obviously not. Obviously not. Obviously
10 not.

11 Q And so your brain injury did not cause you to
12 commit verbal abuse to any of your employees?

13 A Not abuse, no.

14 Q You were never scolding or --

15 A Sure, scolding. Scolding, yeah. I might -- I
16 might have scolded somebody for doing something wrong,
17 like, say, Elizabeth Taylor for throwing her tampons
18 around the place, and -- and taking -- and then hanging
19 around outside. You know all kinds of weird shit.
20 Sure, I scold people. And we also -- remember, that we
21 made a lot of shock content, as well. As very often
22 people would get out of control and -- and so scolding
23 might be the way to manage them, sure.

24 Q Well, what about intimidating or scaring them
25 using your words?

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1 A No. I would say that that is completely
2 wrong. I would say that I gave more attention and gifts
3 and -- you know, the reason why these people sued me was
4 because the party stopped. Because I stopped paying
5 them, and I stopped giving them a free ride. They
6 described that they were trying to -- you know, and it's
7 all -- and it's all very, very clear in the text
8 messages that you will find at the -- as the centerpiece
9 of the writ. And these text messages are very, very
10 clear as to the conspiracy of these people.

11 Q Did -- did you ever -- did you ever insult,
12 humiliate or ridicule the Plaintiff?

13 A No. Never. Never. Never. Why would I do
14 that?

15 Q I --

16 A Why would I do that?

17 Q Perhaps as a result of --

18 A Why do you think I would do that? Why would
19 you ask that question? Because -- because apparently
20 she has recanted every accusation she made of me. But
21 here we are, you still asking these asinine questions.

22 Q What makes you believe that she has recanted?

23 A Because she has said so twice to people that
24 will be in evidence to -- to all of this.

25 Q Who did she recant to?

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1 A She recanted to her ex-boss, Carl Dawson. Um,
2 she recanted to other people. She also recanted in her
3 diary in her own self-confession.

4 Q Who is Carl Dawson?

5 A Well, you're an idiot. Aren't you? You must
6 be an idiot.

7 MR. SOFOS: Hey, Alki --

8 THE WITNESS: Yeah.

9 BY MR. DORDICK:

10 Q Who is Carl Dawson?

11 A Carl Dawson is her boss, her ex-boss that she
12 reported to.

13 Q And who did he work for?

14 A He worked for me.

15 Q Who -- and for which company?

16 A Carl Dawson worked for FilmOn.TV.

17 Q Okay. And what was his role at the company?

18 A Director of marketing and sales to which
19 Margarita answered to.

20 Q And -- and was Margarita in charge of
21 marketing or sales? What was Margarita's job
22 responsibility?

23 A While she was at FilmOn.TV she was suppose to
24 be a salesperson. She was actually produced to me by a
25 guy who is now dead who was the son of a Mafia boss

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1 called Louis B. Fratto. So Joey Fratto introduced me to
2 Margarita. And years later makes me realize just what
3 goes on with these sort of people. And you and the
4 syndicate which is, in fact, a Mafia syndicate. So it
5 goes all the ways back to the Purple Gang, would you
6 believe it, Sumner Redstone, who was Mary Lanchkey's
7 lawyer, brought this corrosive type of lawyering to
8 California, along with Mr. Thomas Vincent Girardi and
9 the whole Loyola family.

10 So you guys -- you guys have created this
11 cesspool that is going to get -- not is going to get,
12 has been broken up and is going to be even further
13 broken up as Girardi's plea deal and -- and when his
14 mouth starts moving. Isn't that going to be -- isn't
15 that going to be fun?

16 Gary Dordick will be way up on the list, I
17 swear to good.

18 Q And this is a crusade led by you and only you
19 against my family.

20 Is that right?

21 A No. It's not only me and only me. But let's
22 talk -- let's talk about every other member that's been
23 fucked up by this syndicate.

24 Q Yeah. But my question is, who else is filing
25 lawsuits like this, to take down --

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1 A Nobody else has the -- nobody else has the --
2 nobody else has the resources, the brains, the courage
3 or -- or the hole in their brain to do this.
4 Q Um --
5 A And that means to stand up for my fucking
6 human rights. My human rights that have been
7 absolutely -- do you know what it's like to cry in your
8 own home, your own family home where your animals are
9 buried, where you have dear early memories there of your
10 beloved father and that this house is being ripped away
11 from you by people who have lied, consciously lied and
12 distorted and worked with lawyers, low rent lawyers such
13 as yourself, and Lisa Bloom and Gloria Allred and Keith
14 Griffin.
15 What about your partner? Do you know that
16 there was recently a United States Supreme Court ruling
17 that partners are liable for the criminality of their
18 partners? Do you know that? So in other words, Keith
19 Griffin -- what? You didn't know that? That's very
20 recent, you should look at up. It's about a year ago.
21 Q I don't --
22 A Sorry?
23 Q Which one of your -- do you have any partners
24 in FilmOn.TV or David Alki Productions or Hologram USA?
25 A I do. I have many partners.

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1 Q Who are those partners?
2 A Every Antiguan citizen. Because now --
3 because now, young man, you're going to get schooled to
4 understand that what you and your -- I don't know what
5 you call it, um, naive, the naive and stupidity of the
6 criminality that you people -- you see, you don't see it
7 perhaps, even it it's criminality because it's so
8 systematic that you think it's okay to fuck people over
9 with a lie. You think it's all right to do that because
10 that's how it works.
11 Well, that's not how it works. That's how
12 people like your father and Gloria Allred and Tom
13 Girardi cry to the courts of justice, which is what you
14 are doing.
15 Q Let me redirect you, sir. My question was, do
16 you have any partners in your FilmOn.TV, David Alki
17 Productions or Hologram USA United States venture?
18 A I already answered you.
19 Q You said the people of Antigua. Would that
20 be --
21 A Yes, sir.
22 Q -- part of the list?
23 A That be would 111,000 people.
24 Q All of them have a partnership interest in
25 your business?

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1 A That's right.
2 Q Do they perform any work for FilmOn.TV in the
3 United States?
4 A Absolutely.
5 Q What --
6 A They are saving your children from dying a
7 horrible death because of asphyxia by -- by making
8 callosal attempts to restore our environmental landscape
9 in a way that might be able to sustain some kind of hold
10 on this callosal mess that we have created on our
11 planet.
12 Q I'm referring to an -- an ownership --
13 A So am I, you idiot. So am I. So am I.
14 Q I believe you are referring to an
15 environmental one. Is that fair?
16 A What are you talking about?
17 Q You're saying that the people of Antigua are
18 involved in FilmOn.TV by -- by protecting the
19 environment?
20 A No. That's one portion of it, yeah. Sure,
21 but that is one portion of it.
22 Q Have you ever paid any proceeds from FilmOn.TV
23 to an individual in Antigua as a result of labor they
24 performed for the company in the United States?
25 A No. But jurisdictionally you guys crossed

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1 into Antigua by attacking my properties and other
2 nations when I am a diplomatic -- when I have diplomatic
3 status and my homes, which are protected, as you will
4 see in the writ, by diplomatic law. That's another
5 reason as to why you have zero jurisdiction and have
6 never had jurisdiction over me, on top of being a
7 British citizen, on top of my companies being British.
8 You have zero right or jurisdiction to file any kind of
9 accusation against me, sir, so suck a dick.
10 Q Um, do you mean that figuratively or
11 literally, sir?
12 A That's another reason for me to break your
13 other nose.
14 Q What do you mean by other nose?
15 A That was figurative.
16 Q Where are you an ambassador or diplomat?
17 A Sri Lanka.
18 Q You're the -- you're an ambassador to or from
19 Sri Lanka?
20 A The -- I am the green economy ambassador to a
21 number of nations now, actually.
22 Q And -- and the green economy, is that an
23 organization?
24 A No, it is not.
25 Q What is it?

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1 A It's a concept.
2 Q And --
3 A In as much as -- in as much as -- in as much
4 as -- in as much as go fuck yourself is a concept.
5 Q I mean, do you understand in the concept of an
6 ambassadorship?
7 A Can we ask some relevant questions?
8 Q Yeah. I mean, you're telling me you have
9 diplomatic immunity and I'm trying to understand --
10 A So why don't you read the writ, you fucking
11 idiot? Why don't you just read the writ?
12 Q I did.
13 A Oh, you did, did you? Oh, you did, did you?
14 Q Was that written by an attorney or yourself?
15 A Which writ are you talking about?
16 Q The -- the one that you had previously given
17 me the case number today filed --
18 A Yeah. How many -- how many pages is it?
19 Q Uh, a lot. I would say --
20 A Yeah. How many?
21 Q Um, at least 100.
22 A Okay. It's actually close to 150. And, yes,
23 it was written by several lawyers, actually.
24 Q And these are -- these are people with law
25 licenses in the United States?

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1 A Yes. They're all with law licenses, yes,
2 absolutely. And not only that, they are Supreme Court
3 Justice -- they have been to the Supreme Court twice and
4 won twice in the United States, which means that they're
5 probably even a little bit more experienced than Gary
6 fucking Dordick. But on the right side of
7 righteousness, not on the dark evil criminal side that
8 has no com- -- moral compass or conscious.
9 Q You mentioned an individual by the name of
10 Joey -- or Joey Fratto. Did you mean Johnny?
11 A Johnny. Excuse me, yes. Johnny.
12 Q And who is this individual? He introduced you
13 to the Plaintiff?
14 A We're not talking about his son, who is -- who
15 is -- we're not talking about his son; we're talking
16 about the father who passed away.
17 Q Who --
18 A What is interesting to me -- what is very
19 fucking interesting to me is that you know Johnny
20 Fratto. That I find very fucking interesting, sir.
21 Q I don't have the slightest idea who this is
22 and that's why I'm trying to ask you.
23 Who is Johnny Fratto?
24 A The interest -- the interest that I have in
25 you knowing who Johnny Fratto is versus Joey Fratto

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1 versus Johnny Fratto, Jr. I find very fucking
2 interesting.
3 Q I --
4 A I find that extremely interesting to me.
5 Q I know that you were introduced by a gentleman
6 by the name of Johnny, um, and that is why I was asking
7 for clarification.
8 A Oh, I see. I see. I see. I see. I
9 understand.
10 Q How did you get --
11 A So you -- so you -- oh, I see. Okay. I
12 understand. All right. So go ahead.
13 Q How did you get introduced?
14 A What do you mean?
15 Q How -- how did you become introduced to
16 Ms. Nichols?
17 A Through Johnny Fratto.
18 Q Yeah. Was it at a party? Was it a social
19 event? Was it with the intention of her seeking
20 employment? Was it for --
21 A It was -- it was -- it was -- it was to look
22 after -- I did Johnny's funeral. I did his whole
23 funeral thing. You know, he passed away. He was a --
24 you know, I thought he was a very nice man. And he
25 appeared on Howard Stern regularly. And, um, he was a

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1 great addition to -- to the family of people that
2 work -- and he -- and the reason why I met him was
3 because, um, he was representing a Hologram technology
4 that I then licensed from him and his partner, who is
5 the inventor. And that is how I met Johnny Fratto; that
6 was your question earlier.
7 And how I met Margarita Nichols was Johnny
8 Fratto brought her to the studio one day and said, can
9 you give her a job. And I said, sure, I can help out.
10 Q Did you review her resume?
11 A Yeah. She didn't have much of a resume so she
12 started as a runner. Um, and, no, I didn't really
13 review her resume, to tell you the truth. She seemed
14 like a nice girl and there was -- you know we had room
15 to support -- so five years later, she is still there so
16 that is indicative of the kind of person that I am.
17 Q Was she --
18 A My employees -- listen. My employees -- I
19 have employees who I have had employed for decade for 40
20 plus years who stayed in my employ. I have employed
21 thousands and thousands of models, men and women, all
22 over the world. I have done tons of shows, not a single
23 fucking complaint from anybody except from your little
24 group of syndicated assholes.
25 Q How many of your --

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1 A How about that?

2 Q How many of your employees --

3 A And if you ask all of the articles that I have

4 written about your dad and the collusion with all -- and

5 all of these people, how many complaints over the years

6 over you knowingly said about Shockya, how many

7 complaints do you think I have had? How many do you

8 think I have ever had? Not one. Not one fucking

9 complaint you criminal little cunt.

10 Q How many of your employees --

11 A You murderous -- you murderous little villain

12 who will end up in prison. You hear me?

13 Q How many of your --

14 A You fucking hear me? You are --

15 MR. SOFOS: Alki, you --

16 THE WITNESS: -- going to jail.

17 MR. SOFOS: Alki, you don't need --

18 THE WITNESS: No.

19 MR. SOFOS: Thank you.

20 THE WITNESS: I fucking need to tell this guy

21 what is going to happen to him because --

22 MR. SOFOS: Alki --

23 THE WITNESS: -- I'm sitting here doing what I

24 am doing --

25 MR. SOFOS: Alki --

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1 THE WITNESS: -- is why.

2 MR. SOFOS: It's going well. Please.

3 THE WITNESS: Because you're a dumb little

4 fuck.

5 MR. SOFOS: Alki --

6 BY MR. DORDICK:

7 Q How --

8 MR. SOFOS: -- please.

9 BY MR. DORDICK:

10 Q How many -- what is in your hand there?

11 A What?

12 Q What is in your hand?

13 A A hammer.

14 Q You know, you don't intend to hurt yourself

15 around us, do you?

16 A No. I intend to break your fucking knees when

17 I see you. How about that?

18 Q Uh --

19 A And that is a fucking threat that you can

20 print on any fucking T-shirt and take it to any fucking

21 jury you want. Suck my dick, you piece of shit.

22 MR. SOFOS: Alki --

23 THE WITNESS: Fuck you, Themis. I told you

24 Themis. I told you -- I fucking told you these people

25 do this deposition after this woman refuses to do her

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1 deposition. They use an angel deposition that they

2 concocted. And you sit there in your righteousness

3 without insurance, without jurisdiction, trying to

4 extort me, you little piece of shit.

5 BY MR. DORDICK:

6 Q How many of your employees have you had sexual

7 relations with in the past?

8 A You have asked me that question already, and I

9 answered you that question.

10 Two. Margarita Nichols who was not my

11 employee; she was an ex-employee. And Mary Rizzo who

12 was my girlfriend at the time that I was single. And

13 she also came on to me. And she is the one -- are you

14 ready for this? This is the beauty. Are you ready for

15 this? Mary Rizzo is the one who said, enough. Because

16 it was her testament with Dana Coles, who later

17 represented me, who is now part of this writ in this

18 complaint of the collusion of the syndicate of douchebag

19 criminal justices three of which have just gone to

20 prison in San Diego because of the Thomas Girardi

21 connection. Read it. It's in my writ. And now you can

22 start sweating bricks. You are all going to prison for

23 what you do.

24 Q What -- how would you describe Ms. Nichols as

25 an employee? Good? Intelligent? Lazy?

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1 A Um, no, she was smart. Um, I -- totally

2 unseasoned, not really prepared to be doing the job of

3 sales.

4 Thank you. Bless you.

5 Um, but a friend of mine asked me -- asked me

6 for of favor, and so I us kept her on -- kept her on the

7 -- you know, I kept her on the -- the payroll of

8 sales --

9 Q Was she fired?

10 A -- until --

11 Everybody was fired.

12 Q Why -- why was that?

13 A Because the company had to shutdown. Because

14 the companies could not afford to go on because of the

15 defamation and the toxic nature of the environment being

16 created as a result of these lawsuits.

17 Q You mean the company ran out of money?

18 A No. It became completely unattainable to live

19 in America with attempts being made on my life, with

20 people defaming me, with me having to -- to pay a --

21 really a fucked up corruptive system of larceny, which

22 is what you people do by invading people's lives and

23 homes.

24 Q Why were attempts made on your life?

25 A Because I am exposing your fathers -- or the

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1 syndicate that your father is a part of, which is a
2 criminal organization.
3 Q We're almost done, Mr. David. Um, bear with
4 me.
5 A You should be ashamed of yourself. You should
6 be ashamed. Because you are going to -- you are going
7 to go to prison and you are going to pay -- you're going
8 to pay dearly for today. You're going to pay dearly for
9 everything that your father has done and everything that
10 Gary --
11 MR. SOFOS: Alki --
12 THE WITNESS: -- that Tom Girardi has done and
13 Gloria Allred, all of the fucking wrongdoing that your
14 fucking syndicate of criminality has done to me and my
15 family and everybody else --
16 MR. SOFOS: Alki --
17 THE WITNESS: -- everybody else, I'm going to
18 fuck you up. And I swear to you until the day I fucking
19 die, you are going --
20 MR. SOFOS: Alki, you don't --
21 THE WITNESS: -- to go to fucking prison.
22 MR. SOFOS: You don't need this. Thank you.
23 Thank you. So if you're done, please say good-bye.
24 BY MR. DORDICK:
25 Q Mr. Alki, I still have a few more questions

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1 for you.
2 A Now there it's a few more questions, is it,
3 because you think you have got me going. You think your
4 technique -- well, let me explain something to you.
5 It's just more of a platform for me to repeat the same
6 message. That you, Dordick, Dordick Law are uninsured,
7 out of jurisdiction, working on knowing -- knowingly
8 working on corrupted lawsuits where the Plaintiff
9 herself doesn't want to be involved and yet, here you
10 are taking a deposition. What is that? What is that
11 other than a crime in motion.
12 MR. SOFOS: Next question.
13 BY MR. DORDICK:
14 Q Mr. Alki, is there a reason why you called my
15 sister a doorknob in an article?
16 A Yeah. Because she is a dumbass like all
17 criminals are.
18 Q But --
19 A Because -- because she just got an education
20 and a donation, alleged donation to a law school based
21 on what, based on money generated how. Answer me that.
22 Q You know nothing about her and you know --
23 have no idea?
24 A I know everything about your fucking father,
25 douchebag. I don't need to know shit about your creepy

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1 little sister or you to know that you are colluding with
2 him.
3 Q Is it fair to say that you have no basis on
4 which to call her a doorknob or to say she is --
5 A That is not true. That is not true. It's
6 my -- it's my right -- it's my absolute right as a
7 publisher and as an editor and as an opinion writer to
8 write whatever the fuck I want if I have evidence to
9 prove that that is true. And I will tell you how your
10 sister is a doorknob.
11 Q Yes. But my question is, what evidence do you
12 have --
13 A By euphonism -- by euphonism, by grammar, by
14 rhyme, and by the fact that she graduated an asinine
15 school like Loyola Law School that is such a corrupt
16 cesspool that even fucking judges at -- what was it, at
17 JAMS, right, fined \$15 million for corrupting law suits,
18 yet they somehow magically stay in business.
19 Well, that's not going to be on my fucking
20 watch, you little cunt. You are not going to get to
21 extort me, okay?
22 Q Is it fair to say that in every chance you
23 have ever taken to try to prevent this extortion, you
24 have lost every single one of them resoundingly except
25 perhaps -- perhaps one time where the jury was hung?

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1 A Yeah. You mean the time when I represented
2 myself. Right? That was the one time you're talking
3 about. You know why? You know why? That was retried.
4 That very trial was retired because the jury believed
5 that there was indeed a conspiracy by Lisa Bloom, who at
6 at that hide all kinds of douchebags involved in that
7 courtroom and lied. And one of them happened to be a --
8 a -- a non-employee of one of the jury's family
9 companies.
10 It was so fucking broken and corrupt. Yet,
11 two years later, we do a retrial over the same nonsense
12 to a corrupted system to the State Court and I lose
13 12-0. I'm not allowed to represent myself. Everything
14 is -- all my rights are taken away because you guys need
15 to make sure through your corruptive little network that
16 you're going to fuck me.
17 Well, guess what? You have no jurisdiction
18 and you are -- made yourself completely complicit in
19 this fucking shakedown, which is what it is, and always
20 has been and will, to this day, remain nothing other
21 than the low rate fucking criminal syndicate of fucking
22 good for nothings like you.
23 All right?
24 Q How is it a man of your stature and wealth has
25 been so successfully shaken down by such low rate

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1 criminals?
2 A I haven't. You're the one who is going to
3 prison, son.
4 Q Okay. So --
5 A You are the one who is going down. You are
6 the one who is manipulating the fucking system. Me --
7 me, a fucking foreigner, fucking standing in front of
8 you fucking douchebags saying go fuck yourself. Come at
9 me, you little cunt. You fucking kill my people. You
10 fucking try murdering me, piece of shit.
11 Q I obviously did not try to murder you.
12 A Yeah. You fucking did. You fucking shit, you
13 fucking little cockroach.
14 MR. SOFOS: Alki, it's enough.
15 THE WITNESS: Fuck you.
16 MR. DORDICK: All right.
17 THE WITNESS: Fuck you. Fuck you.
18 MR. SOFOS: Alki -- Alki --
19 THE WITNESS: No. Fuck you, fucking Dordick.
20 Fucking piece of shit.
21 MR. SOFOS: Alki --
22 THE WITNESS: Your father is done.
23 MR. SOFOS: Alki --
24 THE WITNESS: And you are --
25 MR. SOFOS: Alki --

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1 THE WITNESS: -- right behind. You are the
2 afterbirth scum.
3 MR. SOFOS: Alki -- next question.
4 THE WITNESS: And you're fucking dumbass
5 daughter -- sister, fucking doctorate --
6 MR. SOFOS: Alki --
7 THE WITNESS: -- you are all a bunch of
8 fucking rapists. You fucking idiot, you're the
9 fucking -- you know what, the accusers normally --
10 MR. SOFOS: Alki --
11 THE WITNESS: -- No. 1, aren't they?
12 MR. SOFOS: Alki -- Alki --
13 MR. DORDICK: Okay. Mr. Alki, I think it's
14 clear that any further questioning of you is not going
15 to be productive so --
16 THE WITNESS: Go fuck yourself, you rotten
17 sack of shit.
18 MR. SOFOS: Alki, please.
19 MR. DORDICK: I think we will conclude today's
20 deposition unless there is something else you would like
21 to tell me that --
22 THE WITNESS: No. Today's deposition is the
23 last time I'm saying good-bye to you now. And you --
24 the next time I speak to you will either be to laugh at
25 you, all right, or for you to -- to watch me remotely

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1 connect with you because you're in prison.
2 MR. DORDICK: All right.
3 THE WITNESS: And you will see some video file
4 of me laughing at you.
5 MR. DORDICK: Well, perhaps --
6 THE WITNESS: Because of some fucking
7 mini-series has been made about the fucking -- fucking
8 disgustingness of the fucking L.A. Superior Courthouse.
9 MR. DORDICK: So --
10 THE WITNESS: You are a fucking sham and a
11 disgrace and you belong in prison and that's where you
12 are going. You fucking disgust me. Go fuck yourself,
13 your stupid ass sister and more importantly --
14 MR. SOFOS: Alki --
15 THE WITNESS: -- your corrupt criminal fucking
16 father who ahs born bullshits like you.
17 MR. SOFOS: Alki, please. All right.
18 THE WITNESS: Fuck you, Sofos. Give me a
19 break. Don't fucking please me.
20 MR. SOFOS: Mr. Dordick, thank you for
21 having --
22 THE WITNESS: Fuck you, Dordick. Go fuck
23 yourself. Dordick, suck my dick, you piece of shit.
24 You will be in jail.
25 MR. SOFOS: Thank you, Madam --

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1 THE WITNESS: You know, in other countries
2 they shoot you. In China, they fucking shoot you.
3 MR. SOFOS: Alki --
4 THE WITNESS: In Russia, they fucking shoot
5 you.
6 MR. SOFOS: Alki --
7 THE WITNESS: They fucking rape you. They
8 fucking bury you and throw away the key.
9 MR. DORDICK: I'm not hard to find.
10 THE WITNESS: You fucking lying sack of shit.
11 MR. DORDICK: I'm not hard to find.
12 THE WITNESS: You disgust me. Your father is
13 a criminal sack of shit who is going to burn.
14 MR. SOFOS: Give it a break.
15 THE WITNESS: Fucking awful people.
16 MR. DORDICK: Thank you. We can go off the
17 record.
18 THE VIDEOGRAPHER: Okay. This concludes the
19 deposition of Alkiviades David. We're going off the
20 record. The time is 12:24 p.m. pacific time.
21
22
23
24 (Whereupon the deposition concluded at 12:24 p.m.)
25

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1 STATE OF CALIFORNIA)
2)SS
3 COUNTY OF ORANGE)

4
5
6
7
8
9 I, the undersigned, confirm that I have
10 read the foregoing deposition, and I declare, under
11 penalty of perjury, that the foregoing is a true
12 and correct transcript of my testimony contained
13 therein.

14 EXECUTED this ____ day of _____,
15
16
17 2024, at _____, California.

18
19
20
21 _____
22
23 ALKIVIADES DAVID

1 REPORTER'S CERTIFICATE

2 STATE OF CALIFORNIA)
3) SS
4 COUNTY OF ORANGE)

5 I, KATHRYN MARIE ADAMS, Certified Shorthand
6 Reporter No. 8391, authorized to administer oaths pursuant
7 to the California Code of Civil Procedure, Section 2093(b),
8 do hereby certify:

9 That, prior to being examined, the witness
10 named in the foregoing deposition, was by me duly
11 sworn to testify the truth, the whole truth, and
12 nothing but the truth.

13 That the deposition of the witness in this
14 proceeding was taken down by me in stenotype at the
15 time and place therein named and thereafter reduced
16 to typewriting by computer-aided transcription
17 under my direction.

18 I further certify that I am not interested
19 in the event of the action.

20 WITNESS my hand this 15 day of
21 March, 2024, at Orange, California.

22
23 _____
24 Certified Shorthand Reporter
25 State of California