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7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

9 ALKIVIADES DAVID, FILMON TV LTD.;) Case No. 2:24-cv-01665
10 FILMON TV INC.;)
11 ALKI DAVID PRODUCTION INC.;)
12 HOLOGRAM USA)
13 *Petitioners*)

14 -v-)

15 Los Angeles County Superior Court)
16 No. BC654017, Hon. Michelle Williams)
17 Los Angeles County Superior Court)
18 No. BC643099 Hon. Terry Green)
19 Hon. Christopher K. Lui)
20 Los Angeles County Superior Courts)
21 No. BC649025 Hon. Rafael A. Ongkeko)
22 California State Court of Appeals, Second District,)
23 Division Four.)
24 California State Court of Appeals, Second District,)
25 Division Two.)

26 *Respondents*)

27 Real Parties in Interest:

28 *Elizabeth Taylor*
Chasity Jones
Lauren Reeves
Mahim Khan

1 III. In *Kokkonen v. Guardian Life Ins. Co. of America*, 511 U. S. 375, 377 (1994)
2 the Supreme Court announced, “the district courts of the United States, as we have
3 said many times, are courts of limited jurisdiction. They possess only that power
4 authorized by Constitution and statute,”. The Supreme Court further held that, “in
5 order to provide a federal forum for plaintiffs who seek to vindicate federal rights,
6 Congress has conferred on the district courts original jurisdiction in federal-question
7 cases — civil actions that arise under the Constitution, laws, or treaties of the United
8 States. 28 U. S. C. § 1331. In order to provide a neutral forum for what have come
9 to be known as diversity cases, Congress also has granted district courts original
10 jurisdiction in civil actions between citizens of different States, *between U. S.*
11 *citizens and foreign citizens*, or by foreign states against U. S. citizens. *Exxon Mobil*
12 *Corp. v. Allapattah Services, Inc.*, 545 U.S. 546, 552 (2005) “Because federal courts
13 are courts of limited jurisdiction, they possess original jurisdiction only as authorized
14 by the Constitution and federal statute.” *N.G. v. Downey Regional Medical Center*,
15 140 F. Supp. 3d 1036, 1038 (C.D. Cal. 2015)
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1 PROPER VENUE

2 IV. Petitioner DAVID has a current place of residence in the United
3 Kingdom. Petitioner seeks relief from this Court of proper jurisdiction under its
4 diversity of citizenship statute pursuant to 28 USCS § 1332 (a)(3), whereas DAVID
5 is an additional party to the actions under Coram non judice challenge in this Court
6 and is further a subject or otherwise citizen of a foreign state. The Respondents to
7 this action are all situated within the federal Central District of California, whereas
8 the United States District Court for the central District of California has original
9 diversity jurisdiction over the subject-matter and over the parties.
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13 RELATED CASES

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15 V. SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE
16 COUNTY OF LOS ANGELES CENTRAL DISTRICT LAUREN REEVES v.
17 HOLOGRAM USA INC ET AL, BC643099, December 07, 2016, Judge: Terry
18 Green;
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21 VI. SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE
22 COUNTY OF LOS ANGELES CENTRAL DISTRICT MAHIM KHAN v.
23 HOLOGRAM USA INC ET AL, BC654017, Gloria Allred (Attorney), Filed,
24 3/14/2017, Judge: Michelle Williams Court;
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1 VII. SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE
2 COUNTY OF LOS ANGELES CENTRAL DISTRICT, ELIZABETH TAYLOR /
3 CHASITY JONES v. ALKIVIADES DAVID ET AL, BC649025, Gloria Allred
4 (Attorney), Lisa Bloom (Attorney), Joseph Chora (Attorney), Filed: Feb 02, 2017,
5 Judge: Rafael A. Ongkeko, Judge: Yolanda Orozco;
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8 VIII. SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE
9 COUNTY OF LOS ANGELES CENTRAL DISTRICT, JANE DOE v.
10 ALKIVIADES DAVID, ET AL., Marguerita Nichols, BC643099 / 20STCV37498,
11 Filed Sep 30, 2020, Thomas Girardi (Attorney), Gloria Allred (Attorney), Judge
12 Christopher K. Lui;
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15 IX. CALIFORNIA STATE COURT OF APPEALS, SECOND
16 DISTRICT, DIVISION FOUR; TAYLOR v. DAVID, B285063;
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18 X. CALIFORNIA STATE COURT OF APPEALS, SECOND
19 DISTRICT, DIVISION TWO; KHAN v. DAVID, B305849, B308727;
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21 ABOUT THE PARTIES

22 XI. ALKIVIADES DAVID, also known as “Alki” and known from
23 hereinafter as DAVID is a Petitioner. David is a billionaire businessman, a citizen
24 of the United Kingdom and, duly appointed Ambassador to the country of Antigua /
25 Barbuda, British Passport No, 537982155. David further suffers from an intermittent
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1 neural disorder that has been diagnosed and is cognizable as a disability for the
2 purpose and protections under the American Disability Act (ADA).
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4 XII. FILMON TV LTD., known from hereinafter as, FILMON LTD, is a
5 Petitioner and a United Kingdom company doing business in the United States to
6 include the state of California and internationally.
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8 XIII. HOLOGRAM USA., known from hereinafter as, HOLOGRAM, is a
9 Petitioner and a United Kingdom company doing business in the United States to
10 include the state of California and internationally.
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12 XIV. FILMON TV INC., known from hereinafter as FILMON INC is a
13 Petitioner and a Delaware corporation, doing business internationally.
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15 XV. SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE
16 COUNTY OF LOS ANGELES CENTRAL DISTRICT, is a Respondent in this case
17 and has a place of business at 501 W 1st St., Los Angeles, CA 90012.
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19 XVI. CALIFORNIA STATE COURT OF APPEALS, SECOND DISTRICT
20 is a Respondent in this case and has a place of business at Ronal Regan State
21 Building, 300 S. Spring St. B-228, Los Angeles, CA 90013.
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CAUSES FOR WRIT TO ISSUE

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3 XVII. This action commences to collaterally attack the Judgments and Orders
4 of the SUPERIOR COURT FOR THE STATE OF CALIFORNIA, COUNTY OF
5 LOS ANGELES [and], subsequent appellate Judgment(s) and Mandates of the
6 COURT OF APPEALS OF THE STATE OF CALIFORNIA, SECOND
7 APPELLATE DISTRICT, DIVISIONS TWO and FOUR. Where the absence of
8 jurisdiction by the herein named state courts, and the product of extrinsic fraud on
9 the state courts committed by the REAL PARTIES OF INTEREST produced
10 unlawful domestic and international debt collections which are *void ab initio*. “A
11 judgment rendered in violation of due process is void in the rendering State and is
12 not entitled to full faith and credit elsewhere.” See - *Pennoyer v. Neff*, 95 U.S. 714,
13 732-733 (1878). See also - *World-Wide Volkswagen Corp. v. Woodson*, 444 U.S.
14 286, 291 (1980).

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19 XVIII. The use of *Coram non iudice* was re-emphasized by Justice Scalia in
20 *McIntyre v. Nicastro*, 564 U.S. 873(2011). See also - *Frank v. Mangum*, 237 U.S.
21 309 (1915); *United States v. Bigford*, 365 F. 3d 859 (10th Cir 2004); *Drummond v.*
22 *Lynch*, 82 F. 2d 806 (5th 1936). Traditionally the proposition that the judgment of a
23 court absent of jurisdiction is void, has been embodied in the phrase “*coram non*
24 *iudice*” before a person not a judge. Meaning in effect, that the proceeding(s) in
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1 question were not judicial proceedings, in that lawful judicial authority was absent,
2 and cannot therefore yield a valid judgment. American courts have invalidated, or
3 denied recognition to judgments that violate this common law principle under
4 Amendment V, and long before even the adoption of the United States Constitution's
5 Amendment XIV., and therefore, a judgment maybe attacked in a collateral
6 proceeding even in another jurisdiction on the basis that it has been rendered without
7 jurisdiction. *Burnham v. Superior Court of California*, 495 U.S. 604 (1990); See also
8 - *Dufree v. Duke*, 375 U.S. 106 (1963).

12 INTRODUCTION AND
13 SUMMARY OF THE CENTRAL ISSUE GERMANE

14 XIX. The Superior Courts of Los Angeles County, California; individual
15 California state court judges; and the California State Bar, have fallen prey to
16 corruption through social influence, cronyism, and personal enrichment from a cartel
17 of local lawyers spearheaded by former tort lawyer and now federal criminal
18 defendant Thomas Girardi.
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21 XX. The Petitioners in this matter have been deprived of tens of millions of
22 dollars both domestically and internationally, by California state court judges acting
23 in furtherance of corruptly vested interest in the outcome of each civil case
24 adjudicated by nexus or influence to Thomas Girardi. A fair trial in a fair tribunal is
25 a basic requirement of due process. Fairness of course requires an absence of actual
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1 bias in the trial of cases. But our system of law has always endeavored to prevent
2 even the probability of unfairness. In *Offutt v. United States*, 348 U.S. 11, 14 the
3 court acknowledged that “to this end no man can be a judge in his own case and no
4 man is permitted to try cases where he has an interest in the outcome. That interest
5 cannot be defined with precision. Circumstances and relationships must be
6 considered. This Court has said, however, that "every procedure which would offer
7 a possible temptation to the average man as a judge . . . not to hold the balance nice,
8 clear and true between the State and the accused, denies the latter due process of
9 law." *Tumey v. Ohio*, 273 U.S. 510, 532.
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14 XXI. The totality of constitutional due process deprivations imposed upon
15 the Petitioners by way of judicial corruption through the influences of Thomas
16 Girardi, divested each relevant California state court of jurisdiction over the
17 subject-matter and over the person of the Petitioner(s). (See Appendix 1- Pg 3,
18 SWORN AFFIDAVIT OF RONALD GOTTSCHALK)
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21 “I Ronald Gottschalk of Los Angeles County California,
22 formerly co-counsel with Tom Girardi in numerous cases. I can
23 solemnly swear that Gloria Allred and her daughter Lisa Bloom
24 and Joseph Chora and others have engaged with Tom Girardi
25 and others in a massive widespread scheme of insurance fraud
26 for decades. Against the Federal and State authorities. Pursuant
27 to 28 U.S.C. § 1746(1) I declare under penalty of perjury, and
28 under the laws of the United States of America that the above
statements are true and correct.
Sincerely Ronald Gottschalk”

1 OFFER OF PROOF

2 XXII. If subpoenaed and called upon to testify in an adjudicative hearing on
3 the merits to the claims for relief herein, Ronald Gottschalk would further
4 testify to wit-

5
6 "I was employed as an attorney by Thomas Girardi "Tom" and
7 his Los Angeles law firm. I worked with Tom for a period of 10
8 years." --- "There was a practice applied to all high dollar civil
9 lawsuits in the California state courts that were filed by Tom,
10 Gloria Allred and her daughter Lisa Bloom, the judges of which
11 were handpicked from the pool of influenced "Girardi judges".
12 If the cases landed in the court of someone who was not a Girardi
13 judge, The Girardi, Gloria Allred, Lisa Bloom syndicate would
14 file a motion to manipulate the state court system whereas the
case would be sent to another court that was presided over by a
Girardi judge."

15 XXIII. Mr. Gottschalk, further named Thomas Girardi in a Cross
16 Complaint to a civil lawsuit³ where many of the co-defendants were members
17 of the California Bar and state judiciary from San Diego County, California.
18 See - Appendix 2 at Cover page⁴. The relevance of MR. Gottschalk is to aid

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23 ³ Case No: 37-2008-00096159-CU-MC-CTL

24 ⁴ A court "may take notice of proceedings in other courts, both within and without the federal judicial
25 system, if those proceedings have a direct relation to matters at issue." *United States ex rel. Robinson*
26 *Rancheria Citizens Council v. Borneo, Inc.*, 971 F.2d 244, 248 (9th Cir. 1992) (quoting *St. Louis Baptist*
Temple, Inc. v. FDIC, 605 F.2d 1169, 1172 (10th Cir. 1979)).

1 Petitioners in presenting *prima facie* proof of wide spread corruption within
2 the California Bar and state judiciary to include but not limited to judges at
3 the Superior Court for The State of California, County of Los Angeles.
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5 XXIV. In the Cross Complaint of Mr. Gottschalk, Gottschalk
6 appropriately stated,
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8 “This is a continuation of a similar RICO Act fraud scheme that
9 was perpetrated by the principal attorneys in these related cases
10 and others, commonly referred to as the Judge Adams cases,
11 whereby multiple judges of the San Diego Superior Court were
12 convicted of major fraud and bribery and were removed from the
13 bench. More than 25 judges were incriminated in this RICO
14 fraud scheme by the Presiding Judge.” Pg 6 ¶ 5-12

15 XXV. *United States v. Frega*, 179 F.3d 793, 797 (9th Cir. 1999) is the case that
16 Mr. Gottschalk referred to in his statement, where attorney Patrick Frega and former
17 California Superior Court judges James Malkus and Dennis Adams were convicted for
18 conducting the affairs of the Superior Court through a pattern of racketeering activity
19 in violation of RICO, 18 U.S.C. § 1962(c).
20

21 XXVI. The case involved the federal indictment and convictions relating to
22 numerous bribes paid by Patrick Frega, a San Diego attorney, to three then Superior
23 Court judges, Dennis Adams, James Malkus, and Michael Greer. Over a period of
24 twelve years, Frega, together with Jim Williams, the owner of a San Diego car
25 dealership, purportedly gave more than \$100,000 in payments and benefits —
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1 ranging from automobiles, car repairs, money orders, an apartment, health club
2 memberships, and a queen-sized bed — to the judges or members of their families.
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4 In exchange, Frega allegedly sought and received an unfair advantage in the cases
5 in which he was involved in the Superior Court.

6 **XXVII.** The operational and corrupt conduct of Thomas Girardi mirrors that of
7 Patrick Frega as recently stated and placed before a federal court by the Chicago
8 based Edelson Law Firm, who accused Girardi and other lawyers at his defunct firm
9 of running “*the largest criminal racketeering enterprise in the history of plaintiffs’*
10 *law,*”.⁵

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14 **XXVIII.** The convictions of former California state court judges Dennis Adams,
15 James Malkus, and Michael Greer, did little or nothing to remedy the identically
16 corrupt conduct involving Thomas Girardi, and judges of the Superior Court for the
17 State of California, *County of Los Angeles*. In that, reasonable inferences may be
18 drawn based upon evidence presented today (and more than twenty-five years later),
19 that Thomas Girardi operated corruptly within the jurisdictions of both counties.
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27 ⁵ *Edelson v. Girardi*, 1:20-cv-07115, United States District Court for the Northern District of Illinois.

1 XXIX. On August 31, 2022, *The Los Angeles Times* reported that Thomas
2 Girardi had paid \$300,000 to Tricia Bigelo, who at the time of transfer sat on the
3 California Second District Court of Appeals. See – Appendix 3

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5 XXX. See also – Appendix 4, whereas on August 11, 2022, the *Above The Law*
6 news outlet reported, “Girardi had palsy-walsy relationships with retired and
7 current judicial officers, which many people in the legal community knew, but kept
8 quiet.” Id at pg 3 ¶ 3’

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11 XXXI. See also – Appendix 5

12 “Tom Girardi has been accused of using JAMS to defraud clients.
13 Girardi was a highly respected California attorney who spent
14 decades representing plaintiffs in class action lawsuits against
15 corporations. JAMS, previously known as Judicial Arbitration
16 and Mediation Services, is the largest private mediation and
17 arbitration company in the world with more than 400 former
18 judges and legal professionals serving as arbitrators and
19 mediators in California, Texas, New York, and other states.
20 JAMS has come under intense scrutiny from arbitration lawyers
21 and others in the legal community as several of the company’s
22 judges were accused of unethical conduct and corruption.”

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FACTS COMMON TO ALL CLAIMS FOR RELIEF

29 XXXII. For decades corrupt California based attorneys to include but not
30 limited to: THOMAS GARARDI; GLORIA ALLRED; LISA BLOOM; NATHAN
31 GOLDBERG; RENEE MOCHKATEL; DOLORES Y. LEAL, JOSEPH CHORA

1 and DANA COLE, known from hereinafter as the GIRARDI CARTEL, have
2 developed and operated various criminal fraud schemes in what is estimated by
3 relevant court filings and federal prosecutors to exceed \$1 billion USD, by
4 sophisticated means and influence.
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6 XXXIII. Girardi was once a top plaintiffs' tort attorney and Democratic
7 powerbroker who gained notoriety through the reality TV show "*Real Housewives*
8 *of Beverly Hills*" alongside his third wife, Erika.
9

10 XXXIV. The downfall of Girardi began in December 2020, and was in part
11 triggered by a federal judge's⁶ findings that he had misappropriated millions from
12 families of those killed in an Indonesian airplane crash.⁷
13

14 XXXV. After the collapse of his Wilshire Boulevard law firm, scores of clients
15 came forward attesting that they were swindled by Girardi, with support of those
16 claims coming by way of The Los Angeles Times News Outlet and documenting a
17 trail of misconduct and allegations going back decades.
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19 XXXVI. The Girardi Cartel further elicited the aid and assistance of non-attorney
20 co-participants in its schemes to defraud, to include but not limited to the REAL
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26 ⁶ United States District Judge Thomas Durkin, Northern District of Illinois

27 ⁷ Lion Air Flight JT 610, Case: 1:20-cv-07115 Document #: 197 Filed: 11/16/22

1 PARTIES OF INTEREST to the instant matter to-wit: ELIZABETH TAYLOR;
2 MAHIM KHAN; LAUREN REEVES; and CHASITY JONES.
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4 XXXVII. Thomas Girardi openly boasted of his expansive web of corrupt control
5 in the Los Angeles County Courts. See - *Edelson v. Girardi*, 1:20-cv-07115, United
6 States District Court for the Northern District of Illinois.
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8 “I get along great with all the judges, I can do some real
9 good sh*t. But I want to make sure you know we’d be
10 joined at the hip.”

11 *Thomas Girardi*

12 XXXVIII. In the instant case, the common purpose of the Girardi Cartel’s
13 fraudulent scheme was to swindle and or defraud illicit money from the Petitioners.
14

15 XXXIX. The Girardi Cartel targeted wealthy persons, corporations, and Trust
16 (both domestic and international).

17 XL. The *modus operandi* of the Girardi Cartel victimized celebrities and
18 business executives through a pattern of civil litigations facilitated by knowingly
19 false sexual misconduct related allegations.
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21 XLI. In furtherance of the scheme to defraud, the Girardi Cartel, through
22 bribes and or industry favors (to include California state judicial and political favors
23 or support), acquired lucrative court induced monetary rulings, judgments, and
24 awards against the Petitioners. In other words, the civil cases were “fixed” by the
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1 Girardi Cartel in favor of its vested interest recipients and co-participant clients to
2 include but not limited to the Real Parties of Interest in this matter.
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4 XLII. As an essential part of the corruption scheme Gloria Allred, Lisa
5 Bloom, and Thomas Girardi filed each of the civil lawsuits against the Petitioners in
6 the SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY
7 OF LOS ANGELES CENTRAL DISTRICT oppose to filing the lawsuits under the
8 appropriate federal district court's Diversity Jurisdiction, in that David was known at
9 all times to be a foreign national and citizen of the UNITED KINGDOM.⁸
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12 XLIII. The Girardi Cartel lacked corrupt influence within the UNITED
13 STATES DISTRICT COURTS, and accordingly acted to avoid said courts, arguably
14 due to the Federal Ninth Circuit's previous determination of Thomas Girardi's
15 propensity to defraud.
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20 ⁸ (a) The district courts shall have original jurisdiction of all civil actions where the matter in controversy
21 exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between—

22 (1) citizens of different States;

23 (2) citizens of a State and citizens or subjects of a foreign state, except that the district courts shall not
24 have original jurisdiction under this subsection of an action between citizens of a State and citizens or
25 subjects of a foreign state who are lawfully admitted for permanent residence in the United States and are
26 domiciled in the same State;

27 (3) citizens of different States and in which citizens or subjects of a foreign state are additional parties;
and

28 (4) a foreign state, defined in section 1603(a) of this title, as plaintiff and citizens of a State or of different
States.

1 XLIV. In 2006, the Girardi Cartel swindled DOLE FRUIT COMPANY out of
2 \$500 million USD.
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4 XLV. The federal appeals court found that the Girardi Cartel had willingly
5 executed a fraud upon the court in relation to *Dole* and voided the underlying civil
6 judgements and awards.⁹
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8 XLVI. Moreover, DANA COLE, who at the outset of the litigation was
9 retained by the Petitioners to defend against the lawsuits of the Girardi Cartel, was
10 at all times relevant, married to NANCY COLE LOETERMAN, a known “Girardi
11 judge” within the Los Angeles County Superior Court system.
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13 XLVII. At the time of Cole’s retainer as counsel for the Petitioners, Petitioners
14 were completely unaware that Dana Cole had a corrupt allegiance to the Girardi
15 Cartel or that his wife shared a corrupt nexus to the Girardi Cartel.
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18 XLVIII. Dana Cole, at all times relevant, was aware that David was a foreign
19 national but took no actions toward removal of the civil lawsuits into the federal
20 district courts under 28 U.S.C. § 1441.
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26 ⁹ *In re Girardi*, 611 Fed.3d 1027, 1039-1040 (2006)
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1 XLIX. Dana Cole further neglected to vigorously defend the lawsuits on behalf
2 of the Petitioners, but instead stayed the course and faithfully acted in the best
3 interest of the Girardi Cartel in pursuit of lucrative monetary judgments against the
4 Petitioners and against the best interest of his clients for his own self-enrichment.
5

6 L. Lauren Reeves is a non-attorney co-participant client to the Girardi
7 Cartel, and willfully acted together with Taylor, Khan, and Jones to defraud and to
8 benefit from proceeds derived from fraudulent activities.
9

10 LI. Reeves acquired one or more fraud induced civil lawsuit judgments or
11 awards in the aggregate amount of \$4,795,000.00 against the Petitioners.
12

13 LII. Elizabeth Taylor is a non-attorney co-participant client to the Girardi
14 Cartel and acted with the Girardi Cartel to acquire one or more fraud induced civil
15 lawsuit judgments or awards in the aggregate amount of \$11,000,000.00 against the
16 Petitioners.
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18 LIII. Mahim Khan is a non-attorney co-participant client to the Girardi Cartel
19 and acted in with the Girardi Cartel to acquire one or more fraud induced civil
20 lawsuit judgments or awards in the aggregate amount of \$58,250,000.00 against the
21 Petitioners.
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1 LIV. Chasity Jones is a non-attorney co-participant client to the Girardi
2 Cartel and acted with the Girardi Cartel to acquire one or more fraud induced civil
3 lawsuit awards in the aggregate amount of \$11,000,000.00 against the Petitioners.
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5 LV. The recently discovered massive corruption as portrayed in numerous
6 domestic and international news platforms, layout in detail, vast schemes involving
7 the Girardi Cartel on a global scale. Further, the matter is still being investigated on
8 a regular basis.
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11 THE EXTRINSIC FRAUD ELEMENT

12 LVI. Extrinsic or collateral fraud, which is defined to be "actual fraud, such
13 that there is on the part of the person chargeable with it the *malus animus*, the *mala*
14 *mens* putting itself in motion and acting in order to take an undue advantage of some
15 other person for the purpose of actually and knowingly defrauding him." *Flood v.*
16 *Templeton*, 152 Cal. 148, 155 (Cal. 1907). Accordingly, federal courts have
17 consistently held that extrinsic fraud on a court is, by definition, not an error by that
18 court. It is, rather, a wrongful act committed by the party or parties who engaged in
19 the fraud. *Rooker-Feldman* therefore does not bar subject matter jurisdiction when
20 a federal plaintiff alleges a cause of action for extrinsic fraud on a state court and
21 seeks to set aside a state court judgment obtained by that fraud. See - *Kougasian v.*
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1 *TMSL, Inc.*, 359 F.3d 1136, 1141 (9th Cir. 2004) *See also - In re Murchison*, 349
2 U.S. 133, 136 (1955).
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4 LVII. In 2015, David engaged in a consensual relationship with MARY
5 RIZZO known from hereinafter as RIZZO. Rizzo worked as an employee at
6 Petitioner's Hologram USA.
7

8 LVIII. During a later time and in a period of romantic turmoil between David
9 and Rizzo, Rizzo began a subsequent romantic relationship with another co-
10 employee who encouraged her to employ the legal counsel of Gloria Allred for
11 bringing forth a workplace related lawsuit against David.
12

13 LIX. The lawsuit was settled under a strict Confidentiality Agreement for an
14 undisclosed amount.¹⁰
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16 LX. At a time uncertain but following the date of execution for the
17 Confidential Settlement Agreement, Gloria Allred confided in Elizabeth Taylor the
18 settlement amount that David had made with Rizzo.
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26 ¹⁰ Like Kanye West, Chris Brown, Rose McGowen, Steve Wynn, Russel Brand, Curtis Jackson, Alan
27 Dershowitz, Prince Andrew, Paul Marciano, Kyle Hunter, Morgan Freeman, Kevin Spacey, Scott Baio, and
28 Bill Cosby, who had all been previously targeted by the Girardi Cartel using the same ploy, David also
choose to settle the case to avoid public scrutiny and related social negativities from the matter.

1 LXI. Taylor subsequently announced the confidential settlement amount during an
2 employee related dinner at Cafe Roma in Beverly Hills, California, where Jones,
3 Khan and others were present.

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5 LXII. During this period Elizabeth Taylor and Mahim Khan decided to
6 likewise employ the legal representation of Gloria Allred to fraudulently engage in
7 copycat litigation for the purpose of acquiring money from David for themselves.
8

9 LXIII. According to Mary Rizzo, and supported by material evidence, (See -
10 Appendix 6 - TEXT MESSAGE EVIDENCE Pgs. 5-33) news of the confidential
11 settlement amount did in fact inspired the scheme by Taylor, Khan and Jones to
12 extort David for money by way of fraudulent lawsuit “settlements”... (See -
13 Appendix 6 Pg 12)
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16 “Do you think your attorney will be ok if my attorney speaks to
17 him and that way you can’t talk about it and he will only speak
18 about what is legal and will not get you in any trouble” – “I don’t
19 think it will get that far...it will just be a settlement”

20 *Chasity Jones, Friday, Nov 18, 6:29PM*

21 and that each Real Party of Interest would testify for one another as needed in effort
22 to win their civil lawsuits or to acquire extortion monies by way of settlements.
23

24 (See – Appendix 6 at Pg 2)

25 TAYLOR: --- “All I need is Chasity and MK” --- “MK to say
26 *he touched her boobs (which she told me she would say)*” --- “Chasity to say
27 *she was a witness to the headstand thing)*”

1 LXIV. The conspiracy to extort and or defraud between Taylor, Khan, and
2 Jones manifested not because of any type of sexual misconduct involving David, but
3 in part, for reasons that each Real Party of interest was disgruntled due to the dollar
4 amount in salaries and or commissions that each Real Party of Interest was being
5 paid under the Petitioner's employ.
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8 (See – Appendix 6 at Pg 5)

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

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

16 (See – Appendix 6 at Pg 9)

17 JONES: *“That whok company is dirty”--- “They are trying to*
18 *go public and that not fair how he does me and people” --- “I’m going to call*
19 *and retract my statement from Barry Rotyman too ”¹¹*

20 (See – Appendix 6 at Pg 2)

21 TAYLOR: *This entire thing just sucks & all leads back to being*
22 *scared of Alki. Like we make 2,000 a month, it’s a joke. I already had a final*
23 *interview today. Lol”*

24
25
26
27 ¹¹ Chasity Jones represented to attorney Barry Rothman that she did not see anything alleged by Taylor.

1 LXV. The private text conversations between Mary Rizzo and
2 Chasity Jones on or about May 26, 2015, further reveals the extrinsic fraud
3 committed upon each of the state courts which is the underlying cause for the
4 instant Writ for collateral relief by error coram non judice.
5

6 LXVI. Moreover, Taylor and Khan's extortionate actions caused David to
7 threaten criminal charges as revealed by the May 7, 2016, text communication
8 between Rizzo and Jones.
9

10
11 (See – Appendix 6 at Pg 27)

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

13 RIZZO: *"Damn. Poor Elizabeth. MK too?"*¹²

14 LXVII. These text messages were associated with the underlying civil lawsuits
15 but were corruptly disregarded by the state courts through acts and or influence of
16 Girardi Cartel members. The series of text message communications reveal the
17 extrinsic fraud in relevant parts:
18

19
20 (See – Appendix 6 at Pg 27)

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

23 JONE: *"She asked me to help her case and kept calling me
24 over and over via text but I'm not sure if she told me to file against him or*

25
26
27 ¹² "MK" indicates the initials for Mahim Khan.

1 *not bc I wasn't paying attention to her.” --- “Yes I'm sure. Elizabeth prob*
2 *said we all seen it or something. Who knows.*

3 (See – Appendix 6 at Pg 25)

4 RIZZO: *“Yea she probably did. I never did tho.”*

5 JONES: *“Me either” --- “I never seen him touch her but she always*
6 *had something to say about everyone lol.”*

7 RIZZO: *“OMG she did! Lol” --- “She liked to gossip”*

8
9 JONES: *“Yep”*

10 RIZZO: *“Even about fake stuff”*

11 JONES: *“Lol yes”*

12
13 (See – Appendix at Pg 4)

14 JONES: *“I'm going to call the lawyer back. That what Alki get!!!!”*

15 RIZZO: *“Lol” --- “Yea I knew something was up when MK stopped*
16 *showing up.”*

17 JONES: *“I think I'm going to sue him too bc he deserves it by the way*
18 *he treat people and the things he do to people” --- “I'm going to call Elizabeth today*
19 *this afternoon”*

20 RIZZO: *“It's not just Elizabeth but MK and now you”*

21 JONES: *“Yes” --- “He's a loser!!!!”*

22
23 (See – Appendix 6 at Pg 9)

24 JONES: *“I'm going to sue Alki for harassment. I'm going to go*
25 *home and find another attorney today and go over all my notes I kept”---*
26
27

1 LXVIII. Gloria Allred and Lisa Bloom encouraged Taylor, Khan, and Jones to
2 engage with the Girardi Cartel’s common purpose. Whereas Gloria Allred would not
3 take Elizabeth Taylor’s case unless Taylor recruited two more clients against the
4 billionaire David. The two clients were KHAN and JONES.
5

6
7 (See – Appendix 6 at Pg 2)

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

15
16 (See – Appendix 6 at Pg 3)

17 TAYLOR: *“They told me I need mk, Carl, and Chasity
18 possibly inuk”---“To call them personally”*

19
20 (See – Appendix 6 at Pg 22)

21 RIZZO: *“idk, MK probably made that up cuz she turned out to
22 always be lying...”*

23 LXIX. Extrinsic fraud is perpetrated where a party does not reveal the whole
24 truth, to the extent of his or her knowledge, In *re Sydney V.*, No. B216860, at *1 (Cal.
25 Ct. App. Apr. 14, 2010). Collateral relief should be granted on the grounds that
26 extrinsic fraud perpetrated by Lauren Reeves, Mahim Khan, Elizabeth Taylor, and
27 Chasity Jones acting in concert with the Girardi Cartel, prevented the Petitioners
28

1 from having a fair adversary hearing. See- *Ersheid v. Fernando*, No. B219368, at *1
2 (Cal. Ct. App. Dec. 3, 2010)
3

4
5 THE NEXUS TO INTERNATIONAL COURTS

6 LXX. JOSEPH CHORA is a lawyer and member of the California State Bar. Chora
7 has for many years performed the task of “Enforcer” for the Girardi Cartel.
8

9 LXXI. Further, Chora has and continues to act both domestically and
10 internationally to collect on the unlawful and fraud induced debts against the
11 Petitioners to include Public Offering processes and considerations.
12

13 LXXII. Chora has filed unlawful collection proceedings in multiple
14 jurisdictions within the United Kingdom to include but not limited to Greece, and
15 Switzerland. Accordingly, it shall be unlawful for any person employed by or
16 associated with any enterprise engaged in, or the activities of which affect, interstate
17 or foreign commerce, to conduct or participate, directly or indirectly, in the conduct
18 of such enterprise's affairs through a pattern of racketeering activity
19 [or] collection of unlawful debt." 18 U.S.C. § 1962(c). (Emp added)
20
21
22

23 LXXIII. The Girardi Cartel through Chora have acted to collect on unlawful and
24 fraudulently obtained debts by way of California Superior Court judgments and or
25 awards against the Petitioners to include but not limited to, international properties
26

1 either owned, sanctioned, or protected through diplomatic treaties and or
2 immunities.

3
4 LXXIV. The aforementioned domestic and international properties include but are
5 not limited to:

6
7 LXXV. 4 Wilton Pl., London, SW1X8RH;

8 LXXVI. 8D Ennismore Gardens, London SW7;

9
10 LXXVII. House of David Palio-Limani, Spetses Island, Greece 37 Wispillen
11 Strasse, Gstaad, Switzerland;

12 LXXVIII. 23768 Malibu Rd., Malibu, CA 90265;

13
14 LXXIX. 42045 Lupin Way, Lancaster, CA 93536.

15 LXXX. In all described real property matters, on June 9, 2023, LIONEL
16 HURST, Chief of Staff, OFFICE OF THE PRIME MINISTER ANTIGUA AND
17 BARBUDA, transmitted to ANTONY J. BLINKEN at the United States Department
18 of State, a formal communication from the Government of Antigua and Barbuda,
19 which in relevant parts represents to-wit: (See Appendix 7 - JUNE 9, 2003
20 COMMUNICATION.
21
22

23 “This property is reserved as an Embassy or high commission
24 extension. It serves as a diplomatic mission for Antigua and
25
26
27

1 Barbuda Government in the”¹³ (United Kingdom, Switzerland,
2 United States), “facilitating official engagements, promoting
3 bilateral cooperation, and serving the needs of our citizens
4 residing in or visiting” (United Kingdom, Switzerland, United
5 States).

6 “In accordance with international law and established
7 diplomatic practices, I kindly request the United States
8 Department of State to recognize and respect the diplomatic
9 immunity of these properties. This immunity extends to the
10 premise, furnishings, and assets contained therein, ensuring
11 their protection from any form of legal, administrative, or
12 lawenforcement action that may impede their diplomatic
13 functions.”

14 CONCLUSION

15 LXXXI. All actions of collection taken and or performed by Joseph Chora
16 against the above described real properties taken and or authorized by the Los
17 Angeles County Superior Courts relating to cases: No. BC654017 , Hon. Michelle
18 Williams; No. BC643099 Hon. Terry Green and Hon. Christopher K. Lui; No.
19 BC649025 Hon. Rafael A. Ongkeko; are *void ab initio* and accordingly stands in
20 clear violation of 28 U.S.C. § 1609 which provides that the property of a foreign
21 state held in the United States is immune from attachment, arrest and execution,
22
23
24

25
26 ¹³ Each listed property is referenced in its proper geographical country of location.
27

1 except as provided in § 1610 (property involved in commercial activity) and § 1611
2 (property of the foreign central bank or of the military).” See - *United States v.*
3 *PetroSaudi Oil Servs. (Venez.)*, 70 F.4th 1199, 1207 (9th Cir. 2023).

5 The corrupt conduct fostered by influence(s) of the Girardi Cartel has clearly
6 crossed international lines to encroach upon the diplomatic and sovereign
7 immunities of neighboring countries. The Supreme Court of the United States have
8 consistently recognized that foreign sovereign immunity "is a matter of grace and
9 comity on the part of the United States." *Verlinden B.V. v. Central Bank of*
10 *Nigeria*, 461 U.S. 480, 486, 103 S.Ct. 1962, 1967, 76 L.Ed.2d 81 (1983) ; *Schooner*
11 *Exchange v. McFaddon*, 7 Cranch 116, 136, 3 L.Ed. 287 (1812). In determining
12 whether to exercise jurisdiction over suits against foreign sovereigns, courts
13 traditionally "deferred to the decisions of the political branches ... on whether to
14 take jurisdiction over actions against foreign sovereigns." *Verlinden*, 461 U.S., at
15 486, 103 S.Ct. 1962.

16 Where the immunity of a foreign state and its properties rest beyond the reach
17 of California state courts, the federal district court is bound through diplomatic
18 treaties to nullify all actions of collection targeted at, and in relations to the above
19 described and relevant properties.

1 The District Court is further duty bound to void and or nullify all state court
2 judgements precured by extrinsic fraud and corruption such as the instant case.
3

4 PRAYER

5 LXXV WHEREFORE, Alkiviades David, Filmon TV LTD, Filmon TV INC,
6 Alki David Productions Inc, Hologram USA pray that a writ of Error Coram Non
7 Judice issue against the Los Angeles County Superior Court to nullify its orders,
8 judgments, awards, and proceedings there to, whereas said instruments are *void ab*
9 *initio*. Further, Alkiviades David, Filmon TV LTD, Filmon TV INC, Alki David
10 Productions Inc, Hologram USA, pray for this Court to grant such other relief as
11 may be required by law and just.
12
13
14

15
16 Dated this 29th day of February 2024.
17

18 

19 _____
20 Matthew Huzaineh
21
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