

ALKIVIADES “ALKI” DAVID PRELIMINARY STATEMENT

For the past five years, I have been the victim of serial extortion, and even human trafficking, by well-known TV-centric attorneys Gloria Allred, Lisa Bloom and Thomas Girardi. These crimes arise from legal claims by former employees that worked at my company, Hologram, USA, which was located at 338 N Canon Drive, Beverly Hills. During the relevant period, I was also a Beverly Hills resident. Due to these spurious claims, my company was forced to shut down. Each of the females claimants represented, aided and abetted by the referenced three attorneys, have acted in concert with each other, falsely alleging various acts of sexual harassment against me by acting as witnesses for each other. The respective claimants and their attorneys have abused our legal system by jumping on the #MeToo bandwagon to fabricate their claims. To further these extortion schemes, the attorneys knowingly submitted false evidence and intimidated witnesses in the various court cases, which resulted in various judgments against me, while two other cases are pending trial.

In reviewing Penal Code sec. 236.1 (human trafficking), I note the definition of coercion “includes a scheme to cause a person to believe that failure to perform an act, [e.g. pay money to settle a spurious claim] would result in . . . the abuse or threatened abuse of the legal process,” which is exactly what has occurred to me. These same lawyers issue press releases and appear on television to defame my character, claiming that I am a Greek billionaire, in an orchestrated campaign to coerce settlements in order to cease the endless press coverage.

Here is a brief synopsis of the various cases and the criminal wrongdoing that has occurred:

- *Chastity Jones v. Alki David*, case no. BC649025, brought by attorney Lisa Bloom, alleges that I threatened to fire Chastity Jones if I didn't sleep with her.

- *I was in fact firing her for defrauding me of \$40 000 but I had yet to let her know that.*
 - **Criminal wrongdoing: In testimony under oath, Jones denied being a federally convicted felon, who had a felony warrant at the time of trial from willful failure to pay restitution in connection with a federal fraud conviction;**
 - **I have attached a statement under oath from Ciara Menifee, who states that attorney Lisa Bloom pressured her to give a false statement, which she refused to do, and that Ms. Jones had targeted me regarding false claims of sexual abuse; and**
 - **I have attached a statement under oath from Grant Zimmerman, who states that it was his impression that Ms. Jones targeted me with false claims of harassment.**
- *Elizabeth Taylor v. Alki David, case no. BC649025, brought by attorney Lisa Bloom, is a pending case.*
- *Criminal wrongdoing: Though this trial was a filled with moments of unbelievably callous perjury by Lisa Bloom and her gang it all began with allegations of sexual harassment and assault that were dropped on the day of the trial!*

<https://www.tmz.com/2017/09/15/celeb-hologram-creator-alki-david-sued-sexual-assault/>

In this first trial the jury believed that there was a fraud and conspiracy afoot by Lisa Bloom - the jury was hung 8 4 in my favor. But the damage was being done in very narrow targeted perversion of the law that has been devastating to me personally and the lives of many hundreds of employees family and friends whose lives have been hugely damaged.

- *Mahim Kahn v. Alki David*, case no. BC654017, brought by attorney Gloria Allred, alleges that I
 - **Criminal wrongdoing: Kahn threatened her former roommate, Lauren Berkley, not to truthfully testify in my favor about Kahn's fabricated allegations against me. Berkley submitted a police report documenting the threat. Additionally, Kahn's attorney, Nathan Goldberg (partner of Gloria Allred) forged by attorney's signature on a witness list that was submitted to the court prior to trial. While attempting to collect her judgment against me in Switzerland, Kahn's attorneys criminally misrepresented and fabricated that I had sustained criminal convictions for sexual abuse in the United States. At present, I have filed a criminal complaint in Switzerland with the State Prosecutor alleging various deceptions in Kahn and her attorneys' attempt to seize my assets, including trying to enforce punitive damages portion of a judgment, which is not permitted in Switzerland.**

- *Lauren Reeves, v. Alki David*, case no. BC643099, brought by attorney Gloria Allred.
 - **Criminal wrongdoing: As with Mayim Kahn, the same lawyers are trying to seize assets in Switzerland.**

- In Switzerland four separate counts of coercion with intent to defraud have been filed with public prosecutors there.

- *Jane Doe (a/k/a Margurita Nicholls) v. Alki David*, case no. _____, brought by attorney Thomas Girardi and _____, alleges that I raped her at Hologram offices. However, she has made other rape claims, including against her husband and best friend. A month after the alleged rape, Nicholls brought me a birthday cake.

- - Criminal wrongdoing: As numerous law enforcement authorities are aware, attorney Tom Girardi has defrauded numerous clients out of millions of dollars and is the subject of various state and federal

investigations. The California State Bar has already disbarred him from practicing law; and

- In Mr. Zimmerman's attached statement under oath he states that Ms. Nicholls never complained to him about anything improper with me.

Abused court processes in the above cases have been or are ongoing by the attorneys and their clients. The various assigned judges lack the resources to investigate the alleged criminal wrongdoing, which is why I am seeking law enforcement intervention. I am hoping that your Department will look into these matters and gather the evidence needed to prosecute these individuals and their attorneys for the extortion and perjury perpetrated against me, which has resulted in millions of dollars in falsified judgments.

These attorneys have targeted numerous other individuals with the same M.O. They have made millions of dollars extorting hard-working businessmen, ruining reputations, and destroying personal lives. Thank you for your urgent attention to this request. I look forward to meeting with you to amplify my concerns and cooperate in bringing these crimes to light.

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DECLARATION OF CIARA MENIFEE

I, Ciara Meniffee, state and declare as follows:

1. I have personal knowledge of the facts set forth in this declaration. If called as a witness, I could and would competently testify to the facts set forth herein of my own personal knowledge.

2. I worked for Filmon TV Networks (“Filmon” or “the Company”) as a Media Coordinator from in or around October 2015 to March 2017.

3. My relative, Mary Rizzo, also worked for Filmon. Sometime in or around early 2016, Ms. Rizzo filed a lawsuit against Alkiviades David and the Company. Shortly thereafter, she reached an agreement with the defendants in that lawsuit to drop her claims in exchange for a monetary settlement.

4. During my work for Filmon, I became acquainted with another employee, Chasity Jones. On several occasions, Ms. Jones—who had learned about Ms. Rizzo’s lawsuit against and settlement with Filmon and Mr. David—asked me how much money Ms. Rizzo had received as a result of her settlement. I told her I did not know, yet Ms. Jones continued to ask me about the amount of Ms. Rizzo’s settlement. I found Ms. Jones’ incessant questioning was inappropriate and annoying and I made at least two written complaints to the Company about it.

5. Ms. Jones and Ms. Rizzo shared an office when they worked at Filmon. Ms. Rizzo told me that Ms. Jones made sexually suggestive remarks and comments about Mr. David. For example, Ms. Rizzo said that Ms. Jones told her that Mr. David was “hot” and that she, Ms. Jones, “would give him a chance.”

6. I also personally observed Ms. Jones flirt with Mr. David while at work. She was open about her romantic feelings for Mr. David.

7. I recall one incident where I, Mr. David, two employees from the production department, and Carl Dawson (Ms. Jones’ supervisor) were in a standing meeting in the editing department. Ms. Jones came out of the kitchen and smacked Mr. David on the butt in front of everyone. I was shocked and could not believe that Ms. Jones would do that to her boss. Ms. Jones’ behavior made me feel uncomfortable.

1 8. Ms. Jones never told me that Mr. David had acted inappropriately toward her in any
2 way. Ms. Jones was quite vocal about complaints she had at the workplace and I believe she would
3 have told people had she been subjected to any inappropriate or harassing conduct by Mr. David or
4 anyone else.

5 9. I recall that sometime in or around October or December 2016, Ms. Jones was angry
6 at Mr. David because of dispute over a commission that she said was owed to her. She told me that
7 Mr. David “deserved to be sued,” and that she would “get him.”

8 10. I learned that Ms. Jones later filed a lawsuit against Filmon and Mr. David. Shortly
9 before the trial of Ms. Jones’ lawsuit, sometime in or around May 2019, someone from The Bloom
10 Firm, who represented Ms. Jones, contacted me through my lawyer, David Osorio, who at the time
11 was with the law firm of Blair & Ramirez LLP.

12 11. With the help of Mr. Osorio, I prepared a written statement about my knowledge of
13 Ms. Jones and her claims against Mr. David and the Company. My written statement included the
14 information in paragraphs 4 to 10 above. Mr. Osorio emailed my written statement to The Bloom
15 Firm. After The Bloom Firm received the statement, Lisa Bloom’s daughter, Sarah Bloom, who is
16 also an attorney with the Bloom Firm, contacted Mr. Osorio and requested to interview me.

17 12. In or around July 2019, Lisa Bloom, Sarah Bloom, Mr. Osorio, and I had a telephone
18 call, which I understood was for the purpose of The Bloom Firm preparing me to testify in support
19 of Ms. Jones at trial. During the call, Ms. Lisa Bloom acknowledged that she had received my
20 written statement and so I assumed she knew its contents and would know what my testimony
21 would be if I were to testify at trial.

22 13. Despite what I had stated in my written statement, Ms. Bloom pressured me to testify
23 that I was a victim and that Mr. David had “preyed” on me. She told me that I was part of the “Me
24 Too” movement and that I needed to stand up for myself and other women. I told her I did not
25 agree that I was a victim or that Mr. David had preyed upon me. I also did not believe that I was
26 part of the “Me Too” movement as my claims against the Company and Mr. David were different.
27 Nevertheless, Ms. Bloom continued to pressure me to testify in the way that she wanted me to
28 testify. I expressed that I would not be comfortable testifying in this way because what she was

1 asking me to say was not true.

2 14. Ms. Bloom also asked me about my observations of Ms. Jones in the workplace.
3 From Ms. Bloom’s questioning of me, I understood that she wanted me to testify that Ms. Jones was
4 a good employee, which I did not believe was true. For instance, Ms. Bloom suggested that I testify
5 that Ms. Jones would come to work on time, but, based on my observations, that was not a true
6 statement. I observed that Ms. Jones appeared to come and go as she pleased and, once at work, she
7 would spend a lot of time walking around and talking with people about matters not related to work.
8 In general, she had a bad attitude.

9 15. I told Lisa and Sarah Bloom during our phone call that (i) I had seen Ms. Jones slap
10 Mr. David on the butt while other employees, Mr. David, and I were having a meeting in the editing
11 department; (ii) I had heard Ms. Jones refer to Mr. David as “sexy” and “hot”; (iii) I had read text
12 messages from Ms. Jones to Ms. Rizzo, where Ms. Jones stated that she wanted to “hook up” and
13 have sex with Mr. David; (iv) I had complained to the Company about Ms. Jones repeatedly asking
14 me about the amount of Ms. Rizzo’s settlement; and (v) Ms. Jones told me that she was going to
15 “partner” with Elizabeth Taylor to sue Mr. David.

16 16. Nevertheless, Ms. Lisa Bloom repeatedly told me that Mr. David was a “bad man,”
17 that he deserved what he was getting, and that I needed to say that I had been “victimized” by him
18 throughout my employment at Filmon. I felt that she was bullying me into testifying to matters that
19 were not true.

20 17. For example, when I told Ms. Bloom that I did not believe that I was victimized by
21 Mr. David, she questioned “Well, he did prey on you, didn’t he?” She asked me leading questions
22 and seemed to get frustrated with me because I did not agree with her statements. I was surprised
23 because I had laid out my testimony very clearly in my written statement, which Ms. Bloom said she
24 had seen before our call.

25 18. Ms. Bloom did not ask me any questions about the contents of my written statement;
26 nor did she ask about the alleged conduct of Mr. David at issue; i.e., whether I had seen Mr. David
27 behave inappropriately toward Ms. Jones. If she had asked me that, I would have told Ms. Bloom
28 that I had not seen Mr. David behave inappropriately toward Ms. Jones, but I had seen Ms. Jones act

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inappropriately toward Mr. David by, for example, slapping him on the butt in the workplace.

19. It appeared to me that neither Lisa nor Sarah Bloom was interested in the information I was relaying to them about Ms. Jones’ inappropriate workplace behavior and motives for filing a lawsuit against Mr. David and the Company. I believe they wanted me not to testify about these matters because when I tried to tell them the truth about what happened, Ms. Lisa Bloom told me not to focus on that and to focus only on what she was asking me.

20. At some point during the call, I asked for a break to speak privately with my attorney, Mr. Osorio, because I felt uncomfortable with what I felt was pressure from Ms. Lisa Bloom. During the break, I communicated to Mr. Osorio my discomfort and desire not to testify. When Mr. Osorio and I got back on the call, Ms. Lisa Bloom continued her questioning in the same manner as before.

21. The Bloom Firm tried to serve me with a subpoena to testify at Ms. Jones’ trial on at least two occasions by sending someone to my home. I did not open the door on either occasion. I also received a call from someone who described himself as an “investigator” and who explained that he was looking for me to serve me with some paperwork from the Bloom Firm. He also told me that I was required by law to testify. I refused to cooperate voluntarily with the Bloom Firm because I was not willing to testify the way Ms. Bloom was coaching me to testify.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed on December 28, 2020 at Los Angeles, California.

DocuSigned by:
Ciara Menifee
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Ciara Menifee

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Glaser Weil

DECLARATION OF GRANT ZIMMERMAN

I, GRANT ZIMMERMAN, declare as follows:

1. I am an individual, and submit this declaration concerning my knowledge of the relationship between Alkiviades David ("Alki"), Chastity Jones and Margarita Nicholls (Margarita Nichols?). I have personal knowledge of the facts set forth in this declaration. If called as a witness, I could and would competently testify to the facts set forth herein of my own personal knowledge.

2. From September 2014 to September 2016 I worked for Alki David at a number of his companies, including at Filmon TV and Hologram USA, Inc.

3. My responsibilities included but were not limited to: discovering new talent, locating facilities and venues for events, and arranging third-party industry introductions.

4. During my work for Mr. David I had numerous occasions to observe his behavior in the work place and in particular with regard to two others who worked for him, Chasity Jones and Margarita Nicholls.

5. Chasity Jones was enamored with Alki, wanted to date him. I never heard her complain about any treatment from Alki or observed any interaction between her and Alki which I thought was inappropriate. After word leaked that Alki had settled a claim with another employee I believe Chasity decided to go after Alki by suing him based on false allegations about how Alki had treated her in the workplace.

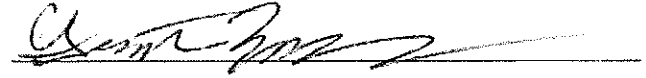
6. My impression of Chasity Jones is that she was out for money and had no hesitation in accusing Alki falsely of misconduct.

7. I also had occasion to get to know Margarita Nicholls. We had coffee on one or two occasions. I learned that at some point she and Alki went on a trip together. I also understood whatever relationship they did have was consensual. Margarita never complained to me that Alki had engaged in any misconduct and especially did not complain that Alki had engaged in sexual harassment, assault or rape against her.

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration is executed on July 12, 2021.



GRANT ZIMMERMAN

Glaser Weil