

Alkiviades “Alki” David, a single man; Anakando Media Group, a British Virgin Islands limited company incorporated in St. Vincent and the Grenadines; FilmOn TV Ltd., a UK company; FilmOn TV Inc., a Delaware corporation; Alki David Productions Inc., a Delaware corporation; Swissx Labs AG, Inc., a Delaware corporation; Swissx Labs AG, a Swiss Corporation; SwissX Group Worldwide, Hologram USA Inc., a Delaware corporation, with its principal place of business in Gstaad, Switzerland; FOTV, Inc., a Delaware corporation.

vs.

Gloria Allred, in her individual capacity and as a principal in Allred, Maroko & Goldberg; Nathan Goldberg, in his individual capacity, and as a partner in Allred, Maroko & Goldberg, Delores Y. Leal, in her individual capacity and as a partner of Allred, Maroko & Goldberg; Renee Mochkatel, in her individual capacity and as a partner of Allred, Maroko & Goldberg; Lisa Bloom, in her individual capacity and as the owner of the The Bloom Firm; Braden Pollack, husband of Lisa Bloom; Arick Fudali, in his individual capacity, and as a partner in the Bloom Firm; Avi Goldstein, in his individual capacity, and a partner in The Bloom Firm; Sarah Bloom in her individual capacity, and as an employee of The Bloom Firm; Thomas V Girardi, in his individual capacity, as a member of his marital community with Erika Girardi, a/k/a Erika Jane, and as a partner in Girardi Keese; Gary A. Dordick, in his individual capacity, and as a partner in Dordick Law Corporation;; Keith Griffin, in his individual capacity, and in his capacity as a former partner in Girardi & Keese, and in his capacity as an associate for Dordick Law Corporation; Joseph Chora, Esq., in his individual capacity, and as a partner in Chora, Young & Manasserian; Ebby S. Bakhtiar, in his individual capacity, and as a partner in The Law Offices of Ebby S. Bakhtiar; Oren Warshavsky, in his individual capacity, and as a partner in Baker Hostetler, Baker Hostetler, a law firm operating in California, Marc Gillieron, as a partner in Chabrier Avocats, SA, Emilie Theintz, in her individual capacity and as an associate in Chabrier Avocats, SA, Chabrier Avocats, SA, a law firm based in Geneva Switzerland, Mahim Khan, a single woman, Elizabeth Taylor, a single woman; Lauren Reeves, a single woman; Chastity Jones, a single woman; Gavin Newsom, a married man; The State Bar of California; The Honorable Yolanda Orozoco, a judge of the Los Angeles Superior Court; The Michelle Williams Court, a judge of the Los Angeles Superior Court; ABC individuals 1-25 inclusive; XYZ corporations 1-25, inclusive; Does 1-25, inclusive.

## COMPLAINT

Plaintiffs Alkivades David (“Plaintiff David”), FilmOn TV, Inc., Alki David Productions, Inc., FilmOn U.K. Limited, Anakando Media Group, SwissX, Inc., a U.S. corporation (U.S. SwissX), SwissX Lab, A.G. a Swiss company (Swiss Lab); Hologram USA, a U.S. Corporation (“Entity Plaintiffs”), for their complaint against Defendants Gloria Allred, in her individual capacity and as a partner in Allred, Maroko & Goldberg; Nathan Goldberg, in his individual capacity and as a partner in Allred, Maroko & Goldberg, Delores Y. Leal, in her individual capacity and as a partner in Allred, Maroko & Goldberg; Renee Mochkatel, in her individual capacity, and as a partner in Allred, Maroko & Goldberg; Lisa Bloom, in her individual capacity, and as a partner in The Bloom Firm, Arick Fudalli, in his individual capacity, and as a partner in The Bloom Firm; Alan “Avi” Goldstein, in his individual capacity, and as a partner in The Bloom Firm, Braden Pollack, in his individual capacity, and as an employee of The Bloom Firm; Tom Girardi, in his individual capacity, and as a partner in Girardi Keese; Gary A. Dordick, in his individual capacity, and as a partner in Dordick Law Corporation; Keith Griffin, in his individual capacity, in his capacity as a former partner in Girardi & Keese, and as an associate in Dordick Law Corporation; Joseph Chora, in his individual capacity, and as a partner in Chora, Young & Manasserian, Ebby S. Bakhtiar, in his

individual capacity, and as a partner in The Law Offices of Ebby S. Bakhtiar, Oren Warshavsky, in his individual capacity, and as a partner in Baker Hostetler, Baker Hostetler, a law firm operating in California, (“Attorney Defendants”), Marc Gillieron, in his individual capacity, and as a partner in Chabrier Avocats, SA, Emilie Theintz, in her individual capacity, and as an associate in Chabrier Avocats, SA, a law firm based in Geneva Switzerland, (Swiss Attorney Defendants), as well against Mahim Khan, a single woman; Elizabeth Taylor, a single woman; Lauren Reeves, a single woman; and Chastity Jones, a single woman, (“Litigating Defendants”).

Plaintiff David and the Entity Plaintiffs allege as follows:

### **JURISDICTION AND VENUE**

The United States District Court for the Southern District of California has jurisdiction pursuant to 28 U.S.C. § 1332 (Diversity Jurisdiction). The Court also has subject matter jurisdiction pursuant to 28 U.S.C. §1331 because some of the claims arise under the RICO, 18 U.S.C. §1961 *et. seq.*

The Attorney Defendants and the Litigating Defendants (Collectively “All United States-Based Defendants”) are subject to specific personal jurisdiction in California. All United States-Based Defendants were physically present in California, emailed and otherwise transmitted documents in California in

furtherance of their extortion scheme and wrongful enterprises and they committed multiple intentional torts in whole or in part in California, causing injury to Plaintiff David and to the Plaintiff Entities.

All United States-Based Defendants' conduct was purposefully directed at California and was continuous and systematic. The United States-Based Defendants have more than minimum contacts with California such that the exercise of personal jurisdiction over them comports with traditional notions of fair play and substantial justice and is consistent with the Due Process Clause of the United States Constitution.

Venue is proper in this judicial district pursuant to 18 U.S.C. §1965 and 28 U.S.C. §1391 because the United States-Based Attorney Defendants are subject to personal jurisdiction in this judicial district as they reside, are found, have agents, and transact affairs in California. A substantial part of the events giving rise to the claims asserted in this action occurred in the Southern District in California, where Plaintiff David and Plaintiff Entities suffered actual and special damages.

Swiss Defendant Attorney Marc Gillieron, in his individual capacity, and as a partner in Chabrier Avocats, SA, and Swiss Defendant Attorney Emilie Theintz, in her individual capacity, and as an associate in Chabrier Avocats, SA, a law firm based in Geneva Switzerland, ("Swiss Defendant Attorneys") were hired by Defendants Allred and Bloom and Litigating Defendants Chastity Jones and Mahim

Khan to attempt to collect on judgments obtained in this jurisdiction, where Plaintiff David and Plaintiff Entities, suffered actual and special damages.

Venue is proper in this judicial district pursuant to 18 U.S.C. §1965 and 28 U.S.C. §1391 because the Swiss Defendant Attorneys are subject to personal jurisdiction in this judicial district. Defendants have agents, and transact affairs in California. A substantial part of the events giving rise to the claims asserted in this action occurred in the Southern District in California, where Plaintiff David and Plaintiff Entities, suffered actual and special damages.

Swiss Attorney Defendants were hired by Attorney Defendant Allred on behalf of Defendant Allred, Maroko & Goldberg and by Defendant Attorney Oren Warshavsky, in his individual capacity, and as a partner in Baker Hostetler, a law firm operating in California, in *Mahim Kahn v. Alki David, et. al*, LASC County No. BC654017 2022)

### **PARTIES**

Plaintiffs Alkiviades David (Plaintiff David), is a resident of California and a citizen of the United Kingdom.

Plaintiffs FilmOn TV, Inc., Alki David Productions, Inc., FilmOn U.K. Limited, Anakando Media Group, SwissX, Inc., a U.S. corporation (U.S. SwissX), SwissX Lab, A.G. a Swiss company (Swiss Lab); Hologram USA, a U.S. Corporation (“Entity Plaintiffs”) conduct business operations in the United States,

including but not limited to, in California.

Attorney Defendant Gloria Allred is a citizen of California.

Defendant Allred, Maroko & Goldberg is a California law firm. 4

Attorney Defendant Nathan Goldberg is a citizen of California and is a named partner in Allred, Maroko & Goldberg.

Attorney Defendant Delores Y. Leal is a citizen of California and is a partner in Allred, Maroko & Goldberg.

Attorney Defendant Renee Mochkatel is a citizen of California and is a partner in Allred, Maroko & Goldberg.

Attorney Defendant Lisa Bloom, is a citizen of California and is a partner in The Bloom Firm, a California law firm.

Defendant Braden Pollack, is the husband of Lisa Bloom and all pertinent times Pollack acted on behalf of the marital community consisting of Defendant Lisa Bloom and Defendant Braden Polack, as well as on behalf of The Bloom Firm.

Attorney Defendant Arick Fudalli is a citizen of California and is a partner in The Bloom Firm.

Attorney Defendant Alan “Avi” Goldstein, is a citizen of California and is a partner in The Bloom Firm.

The Bloom Firm is a law firm operating in California.

Attorney Defendant Thomas V. Girardi is a citizen of California.

Defendant Girardi & Keese was a law firm in California.

Attorney Defendant Ebby S. Bakhtiar is a citizen of California, practicing at his own California law firm, Ebby S. Bakhtiar, PC.

Defendant Gary A. Dordick, is a citizen of California and a partner in Dordick Law Corporation.

Defendant Dordick Law Corporation is a law firm operating in California. Attorney Defendant Keith Griffin is a citizen of California. Upon information and belief, Griffin was a member of the Girardi Keese firm, and is presently an associate at Dordick Law Corporation.

Upon information and belief, Attorney Defendant Oren Warshavsky is a resident of New York and a partner in Defendant Baker Hostetler, who caused Plaintiff David and the Entity Plaintiffs (“All Plaintiffs”) harm in California.

Defendant Baker Hostetler is a firm operating in California.

Upon information and belief, Attorney Defendant Marc Gillieron is a resident of Switzerland.

Upon information and belief, Attorney Defendant Emilie Theintz is a resident of Switzerland.

Defendant Chabrier Avocats, SA, is a law firm based in Geneva, Switzerland that caused the Plaintiffs harm in California.

Upon information and belief, Litigating Defendant Mahim Khan is a citizen of Pakistan and is a resident of California. Upon information and belief, Litigating Defendant Mahim Khan is a single woman.

Upon information and belief, Litigating Defendant Elizabeth Taylor is a citizen of California. Upon information and belief, Litigating Defendant Taylor is a single woman.

Upon information and belief, Litigating Defendant Lauren Reeves is a citizen of California. Upon information and belief, Litigating Defendant Reeves is a single woman.

Upon information and belief, Defendant Chastity Jones is a citizen of California. Upon information and belief, Defendant Jones is a single woman.

The State Bar of California is a State Government Entity charged with overseeing attorneys' ethical practicing of law and with suspending and disbaring those attorneys who violate ethical standards.

Governor Gavin Newsom appoints four of the six members to the Board of Governors for the State Bar of California and, upon information and belief, therefore had substantial control over the State Bar of California during all relevant times encompassed by this lawsuit.

## **INTRODUCTION**

Earlier this year, the California Court of Appeals considered the following question: “Lawyers argue for a living. Some do more than argue. They lace their settlement demands with threats. When do such aggressive settlement tactics cross the line and become professional misconduct? *Falcon Brands, Inc., v. Mousavi & Lee, LLP*, 74 Cal. App.5th 506, 511 (2022).

The answer to that question is presented by the facts underlying this case. This is a case about extortion. This case also alleges that the Attorney Defendants, the Litigating Defendants and the Swiss Attorney Defendants (“All Defendants”) committed obstruction of justice, wire fraud, mail fraud, bribery and aiding and abetting against Plaintiff David and the Entity Plaintiffs.

This complaint alleges that Attorney Defendants Allred and Bloom and Litigating Defendants Khan and Reeves committed defamation against Plaintiff David. With regard to the defamation claim, Plaintiff David is seeking compensatory damages “for all physical injuries, emotional distress, psychological harm, anxiety, humiliation, physical and emotional pain and suffering, family and social disruption, and other harm.”

This Complaint also alleges corporate defamation against FOTV, Inc. and its holding companies, Anakando and its holding companies, and the Hologram, USA Group of Companies, as well as intentional interference with contractual relations,

intentional interference with prospective contractual relations, and intentional infliction of emotional distress against Plaintiff David, all allegations based on the pattern of extorting actions committed by Attorney Defendant Allred, in her individual capacity, and as a member of Allred, Maroko & Goldberg and its employees and partners, Attorney Defendants Goldberg, Leal, Mochkatel, and Goldstein, each of whom Plaintiff David and the Entity Plaintiffs are suing in their individual capacities, in addition to their capacities as employees and partners in Allred, Maroko & Goldberg; Attorney Defendant Lisa Bloom, in her individual capacity, on behalf of her marital community, and as a partner in The Bloom Firm, Attorney Defendant Arick Fudali, in his individual capacity, and as a partner in The Bloom Firm, Attorney Defendant Braden Pollack, in his individual capacity, on behalf of his marital community with Lisa Bloom, and as an employee of The Bloom Firm; Attorney Defendant Goldstein, in his individual capacity, and as a partner in The Bloom Firm; The Bloom Firm; Defendant Girardi, in his individual capacity and as a member of his marital estate with Erika Girardi, aka Defendant Erika Jane; Defendant Erika Jane as a member of the Girardi Family Syndicate or The Girardi Syndicate. Attorney Defendant Dordick, in his individual capacity, and as a partner in Dordick Law Corporation; Attorney Defendant Griffin, in his individual capacity, and in his capacity as a former partner in Girardi & Keese, as well as in his capacity as an associate in Dordick Law Corporation; Attorney

Defendant Joseph Chora, in his individual capacity, and as a partner in Chora, Young & Manasserian; Attorney Defendant Bakhtiar, in his individual capacity, and as a partner or owner in The Law Offices of Ebby S. Bakhtiar, Attorney Defendant Warshavsky, in his individual capacity, and as a partner in Baker Hostetler, (Collectively, “United States-Based Attorneys”), Attorney Defendant Gillieron, in his individual capacity, and as a partner in Chabrier Avocats, SA; Attorney Defendant Emilie Theintz, in her individual capacity and as an associate in Chabrier Avocats, SA; and Chabrier Avocats, SA, a law firm based in Geneva Switzerland. (Collectively “Swiss Attorney Defendants.”)

This is also a case that illustrates the ancient admonition - “Where law ends, tyranny begins.” (John Locke, 1689) because at every stage of all Defendants’ various lawsuits asserted against Plaintiff David and the Plaintiff Entities, those in power, attorneys who are duty bound to be officers of the court, judges who are duty bound to fairly adjudicate cases so that all parties’ constitutional rights are protected, law enforcement officials who are duty bound to investigate wrongdoing such as the extortion, obstruction of justice, and bribery that has victimized Plaintiff David and The Entity Plaintiffs - all of those in power failed to fulfill their roles. In doing so, they have permitted the pattern of criminal racketeering and All United State-Based Attorneys to continue their wrongdoing.

Unfortunately, as renowned L.A. attorney Patty Glaser, whose firm Glaser

Weil is representing Plaintiff David and Entity Plaintiffs has said, “America has become a country of what you can allege, rather than what you can prove.”

### **The Pattern of Criminal Racketeering**

Plaintiff David is but one of many targets who were victimized by Defendants Girardi, Allred and Bloom, in their initial enterprise, by United States-Based Attorney Defendants as the enterprises expanded to further their conspiracies, and by the Swiss Attorneys and Litigating Defendants Jones and Khan who conspired to attempt to collect judgments for punitive damages in Switzerland in contravention of Swiss law. Litigating Defendant Khan and her Swiss counsel, the Defendant Swiss Attorneys, attempted to collect a non-final judgment in the *Khan* case, thereby violating Swiss law.

Other notable targeted individuals include Steve Wynn, who Defendant Bloom recently paid to settle his defamation claim against her. [Wynn v. Bloom](#), D. Nev., No. 2:18-cv-00609, stipulation of dismissal 5/19/22. [Microsoft Word - SAO for Dismissal.docx \(aboutblaw.com\)](#)

Remarkably, Defendant Bloom’s modus operandi in the *Wynn* matter mirrors her behavior against Plaintiff David ~ Bloom and her client accused Wynn of sexual harassment and retaliation in a press release. Here, Bloom has accused Plaintiff David of rape, thereby defaming him. **Add Rose McGowan.**

*Edelson, PC, v. David Lira; Keith Griffin, Erika Girardi, a/k/a Erika Jayne*

*et. al.*, Case 3:22-cv-03977 (7/06/22), filed in the United States District Court for the Northern District of California, San Francisco Division is also illustrative of the United States-Based Defendants’ wrongful enterprise. The *Edelson* Complaint alleges that the former firm Girardi Keese allegedly operated as a continuing criminal enterprise that stole more than \$100 million from its clients, co-counsel and vendors and siphoned off clients’ settlement payments to members of the Girardi Family Syndicate, including Defendant Erica Girardi a/k/a Erica Jayne. *See Edelson, PC, v. David Lira; Keith Griffin, Erika Girardi, a/k/a Erika Jayne et. al.*, Case 3:22-cv-03977 (7/06/22), filed in the United States District Court for the Northern District of California, San Francisco Division. (Appendix \_\_\_\_).

On May 1, 2022, Paul Marciano (“Marciano”) filed a personal injury lawsuit against Lisa Bloom and The Bloom Firm law firm in the Los Angeles County Superior Court of California, seeking general, compensatory and punitive damages, among other reliefs, for the Defendants’ alleged extortion, deceptive and improper behavior. Marciano’s complaint alleged, “This is a case of extortion. It arises out of what has become a pattern of tortious, deceptive, and otherwise improper behavior by the defendants that has been exposed by a former client who had the courage to be a whistleblower to their outrageous conduct. *The Bloom Defendants have hidden behind their status as lawyers. But a bar card is not a license to commit extortion.*” (Emphasis added).

Marciano further alleged, “The Bloom Defendants’ practice is to target well known individuals and public companies with accusations of improper behavior, typically under the guise of a purported sexual harassment claim, and threaten to make those accusations public. Whether the accusation is true or not does not matter. *What matters is making the target pay up.*” (Emphasis added). Marciano also alleged, “The Bloom Defendants set their sights on Plaintiff and the company he co-founded, Guess? Inc. (“Guess”). Consistent with their typical shakedown practice, the Bloom Defendants threatened to publicly accuse Plaintiff of having committed, and Guess of being complicit in, serious and violent felony criminal conduct unless Plaintiff and Guess paid the Bloom Defendants’ client (and by extension, the Bloom Defendants) money.”

Marciano’s allegations continue by asserting, “The Bloom Defendants forced Plaintiff to play an extortive game of Russian roulette. They intentionally sought to induce fear in Plaintiff that he would suffer severe consequences and damage if the Bloom Defendants pulled the trigger on their threats. The Bloom Defendants threatened to publicize despicable accusations that they knew were utterly false.” Marciano alleged, “Incredibly, it gets worse. Not only did the Bloom Defendants make their threats against Plaintiff knowing the allegations were false, but they also disregarded clear instructions from their own client to not accuse Plaintiff of rape. The client (hereinafter referred to as “S.S.”) specifically told the Bloom Defendants

that Plaintiff never raped her.”

Marciano also alleged, “*The Bloom Defendants carry out such schemes under the guise of legal advocacy, using their client as a tool to line their own pockets. They concoct phony allegations of horrific conduct, and bank on the reality that their targets do not want such disgusting and outrageous allegations made public, even if they are false.* (Emphasis added).

Marciano also alleged that the Bloom Defendants knew that Plaintiff did not ‘rape’ S.S. and made such threats regardless of the fact that such threats were false.

In this case, Plaintiff David and the Entity Plaintiffs’ also suffered at the hands of Bloom, who has defamed Plaintiff David and accused him of rape, when, in fact, *nothing could be further from the truth.* She did so in the Stanley Mosk Courthouse and she did so in the United Kingdom, as more fully alleged herein in this Complaint’s Defamation Count.

This Complaint is filed during the demise of the house of cards nefariously and corruptly constructed by Attorney Defendants Girardi, Allred and Bloom and by the named United States-Based Attorney Defendants who conspired with one another as well as with Girardi, Allred and Bloom in decades-long criminal enterprises.<sup>1</sup> Such enterprises are commonly referred to as the Girardi Family Syndicate or The

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<sup>1</sup> See [www.law360.com/articles/1349235/girardi-s-legacy-in-shambles-amid-shakespearean-scandal](http://www.law360.com/articles/1349235/girardi-s-legacy-in-shambles-amid-shakespearean-scandal).

Girardi Syndicate, criminal enterprise syndicates that conducted their fraudulent and extortionate activities under the auspices of legitimate law firms.

As of this filing, All United States-Based Attorneys' patterns of illegal criminal enterprises have been "outed" - it is now known that for decades, the United States-Based Defendant Attorneys targeted public figures and successful individuals, exploited the media to defame innocent targets, and extorted individuals and businesses by demanding unjustified settlements and by filing spurious malicious lawsuits against innocent defendants, including Plaintiff David and the Entity Plaintiffs.

The series of allegations set forth in good faith in this Complaint are asserted after a thorough exercise of due diligence. The allegations are so egregious that their existence contravenes all due process guarantees to which every American is entitled. It strains credulity that such unethical and illegal actions by Defendant Attorneys would occur for many years unfettered, even with the acquiescence of The California State Bar and, upon information and belief, with the acquiescence of various California State Court judges, who for a series of years ignored complaints against Defendant Attorneys Girardi, Allred and Bloom while their law firms, Girardi & Keese, Allred, Maroko & Goldberg and The Bloom Firm operated as ostensibly legitimate law firms but were in fact their criminal enterprises.

However, that is precisely what happened. Further, upon information and

belief, the Allred-Bloom-Goldberg-Griffith-Dordick-Chora syndicate utilized, and continues to utilize, similar corrupt, extorting and litigating tactics against Plaintiff David and the Entity Plaintiffs, as more fully alleged herein, while their law firms, Allred, Maroko & Goldberg, The Bloom Firm and Chora, Young & Manasserian, and The Dordick Law Corporation were their criminal enterprises.

This Complaint is also being filed as the pendulum regarding the laudatory “Me Too” movement, which is intended to protect women’s rights, but which has been grossly misused by many opportunistic plaintiffs - swings from providing a basis for a tsunami of spurious lawsuits filed against Plaintiff David and the Entity Plaintiffs and similar innocent defendants worldwide, to achieving an equitable jurisprudential balance wherein such suits, when valid, can provide proper remedies for those who truly have been victimized.

Plaintiffs assert that the United States-Based Attorney Defendants’ pattern of racketeering activity is to target well-known individuals, such as Plaintiff David, with accusations of improper behavior, typically under the guise of purported, falacious sexual harassment claims, and to threaten to make those allegations public, all with a wilful intent to get the target to pay up.

The United States-Based Attorney Defendants unlawfully and tortiously attempted to, and in some instances did, extract millions of dollars from Plaintiff David and the Entity Plaintiffs through their illegal enterprises that employed

calculated media campaigns, threats and intimidation, and abusive, fabricated litigious actions. Most notably, Litigating Defendants Taylor and Khan demanded millions from Plaintiff David as hush money so they wouldn't "report crimes." Litigating Defendant Taylor demanded \$2.2 million and Litigating Defendant Khan demanded \$1.9 million.

When Plaintiff David and his counsel, Barry Rothman (deceased), reported that extorting conduct by Litigating Defendants Taylor and Khan to the Beverly Hills Police, upon information and belief, officials there reported the matter to the Attorney General. However, no action against the extorting counsel or those Litigating Defendants was ever initiated. Just like Steve Wynn, Plaintiff David was the object of extortion. Just like Paul Marciano, Plaintiff David was the object of extortion.

Rothman wrote to Detective **first name** Delatorre attaching sworn affidavits executed by employees of the Entity Plaintiffs stating that Plaintiff David had never touched or sexually harrassed Litigating Defendants Khan or Taylor. **INSERT A LINK TO CORRESPONDENCE from Barry Rothman to Detective Delatorre (sp?) LINK TO AFFIDAVITS AND LETTER TO DETECTIVE DELATORRE**

Plaintiff David and the Entity Plaintiffs allege that Defendants Mahim Khan, Elizabeth Taylor, Lauren Reeves and Chastity Jones (Collectively, "Litigating

Defendants”) knowingly and wilfully conspired and colluded with All Defendant Attorneys against Plaintiff David and The Entity Plaintiffs to further their participation in the past and ongoing interrelated enterprises calculated to extort money from Plaintiff David and the Entity Plaintiffs.

Plaintiff David and the Entity Plaintiffs allege that Litigating Defendant Reeves and Khan knowingly and wilfully conspired and colluded with The Swiss Defendants to further their participation in the past and ongoing interrelated enterprises calculated to extort money from Plaintiff David and the Entity Plaintiffs.

This action is filed pursuant to the Racketeer Influenced and Corrupt Practices Act (“RICO”), 18 U.S.C. §§ 1961-68, alleging that the United States-Based Attorney Defendants, The Swiss Attorney Defendants, and the Litigating Defendants (Collectively “All Defendants”) caused Plaintiff David’s and the Entity Plaintiffs’ injuries by committing predicate acts in violation of 18 U.S.C. §1951 (Extortion), 18 U.S.C. § 1341 (mail fraud), 18 U.S.C. § 1343 (fraud by wire, radio, or television), 18 U.S.C. § 1503 (obstruction of justice), as well as for bribery and aiding and abetting in furtherance of an illegal racketeering enterprise as set forth in this Complaint.

This Complaint seeks monetary damages, including statutory treble damages, for Plaintiff David’s and the Entity Plaintiffs’ compensable injuries

directly related to all of the Defendants' racketeering enterprises which are cognizable pursuant to 18 U.S.C. §§1962(b)(c) and (d).

This action also asserts claims for intentional and negligent interference with prospective and ongoing contract relations and seeks damages for All Plaintiffs' compensable injuries directly related to the United States-Based Attorney Defendants, The Swiss Attorney Defendants and the Litigating Defendants ("All Defendants") harassing and extorting Plaintiff David and the Entity Plaintiffs, causing Plaintiff David and the Entity Plaintiffs to lose then-existing customers and business relationships, as well as to lose future business customers and future contracts in an amount to be proven at trial.

Plaintiff David and The Entity Plaintiffs also assert a claim for defamation against Plaintiff David and Corporate Defamation claims against the Entity Plaintiffs ~ All Defendant Attorneys, both the United States-Based Attorney Defendants and the Swiss Attorney Defendants have defamed Plaintiff David and The Entity Plaintiffs.

This action also asserts intentional infliction of emotional distress claims against All Defendants because they have harmed Plaintiff David, who has suffered terribly as a result of the All Defendants wrongfully suing him, trying to extort money from him and harassing both Plaintiff David and The Entity Plaintiffs so as to extort money and property from Plaintiff David. **ALKI WE NEED TO**

## **EXPAND ON THE EMOTIONAL DISTRESS**

Plaintiff David and The Entity Plaintiffs seek damages for their pecuniary losses attributable to All Defendants' extortion, obstruction of justice, bribery, wire fraud, mail fraud, bribery and aiding and abetting, as well as for All Defendants' intentional and negligent interference with ongoing and prospective contract relations, damages for Plaintiff David's emotional harm caused by All Defendants' intentional infliction of emotional distress, and damages for the wrongful defamation perpetrated against Plaintiff David and the corporate defamation perpetrated against the Entity Plaintiffs.

All told, the Girardi Family Enterprise and the United States Based Attorneys' Enterprise stole \$1.75 Billion from Plaintiff David and the Entity Plaintiffs through their schemes which entirely destroyed Plaintiff David's legitimate business entities and public offerings on NASDAQ. Defendant Attorneys Goldberg, Bloom, Chora et. al. repeatedly alluded before juries and judges that the Securities and Exchange Commission had determined that Plaintiff David had committed fraud with regard to the IPO. In fact, Plaintiff David and the SEC settled amicably with Plaintiff David having no wrongdoing whatsoever. Ironically, the Company was fined \$120,000 to pay administrative costs to the SEC, after Plaintiff David's \$200 million investment had been defamed and destroyed. Entity Plaintiffs seek treble damages, attorneys' fees, and punitive

damages, for an amount in excess of \$6 Billion.

Plaintiffs allege that Attorney Defendants Gloria Allred, in her individual capacity, and as a partner in Allred, Maroko & Goldberg; Nathan Goldberg, in his individual capacity, and as a partner in Allred, Maroko & Goldberg; Delores Y. Leal, in her individual capacity and as a partner in Allred, Maroko & Goldberg; Renee Mochkatel, in her individual capacity and as a partner in Allred, Maroko & Goldberg; Lisa Bloom, in her individual capacity, on behalf of the marital community consisting of Lisa Bloom and Braden Pollack, and as an owner of the Bloom Firm; Braden Pollack, individually, on behalf of his marital community with Lisa Bloom, and as an employee of The Bloom Firm; Thomas V Girardi, in his individual capacity and on behalf of his marital community with Erika Jones; Gary A. Dordick, in his individual capacity, and as a partner in Dordick Law Corporation; Keith Griffin, in his individual capacity and in his capacities as a former partner in Girardi & Keese, and as an associate in Dordick Law Corporation; Dordick Law Corporation; Joseph Chora, in his individual capacity, and as a partner in Chora, Young & Manasserian; Ebby S. Bakhtiar, in his individual capacity, and as a partner in The Law Offices of Ebby S. Bakhtiar; Oren Warshavsky, in his individual capacity, and as a partner in Baker Hostetler; Marc Gillieron, in his individual capacity, and as a partner in Chabrier Avocats SA; Emilie Theintz, as an individual, and as a associate in Chabrier Avocats, SA (Collectively, “All Defendant Attorneys,”) are each culpable persons capable of

holding legal or beneficial interests in property, who wilfully intended to commit the RICO predicate acts alleged herein despite knowing that those acts were illegal.

All Attorney Defendants have participated in long-term, organized conduct consisting of a criminal enterprise affecting interstate and international commerce through a continuous and interrelated pattern of racketeering activity, in violation of RICO laws set forth in 18 U.S.C. §§1962 (b)(c)(d).

As more fully stated herein, those predicate acts consist of extortion, wire fraud, mail fraud, bribery, and obstruction of justice (“RICO Predicate Offenses”). The criminal enterprise continues to violate the hereinstated RICO predicate offenses and thereby harm Plaintiff David and the Entity Plaintiffs. Litigating Defendants Mahim Khan, Elizabeth Taylor, Lauren Reeves, and Chastity Jones colluded and conspired with the United States-Based Attorney Defendants, seeking to extort money from Plaintiff David and Plaintiff Entities and filing spurious lawsuits against Plaintiff David and Plaintiff Entities.

Each Litigating Defendant is a culpable person capable of holding legal or beneficial interests in property, who participated with United States-Based Defendant Attorneys in a long-term, organized conduct of a criminal enterprise affecting interstate and international commerce through a continuous and interrelated pattern of racketeering activity, in violation of RICO laws set forth in 18 U.S.C. §§1962 (b)(c)(d).

Litigating Defendant Khan participated in the Swiss Attorney Defendants' illegal efforts to enforce immature judgments against Plaintiff David, knowing that her case was on appeal in the United States, and thus was not collectible in Switzerland. Further, Defendant Khan wrongfully and illegally defamed Plaintiff David in Switzerland, alleging David had been "convicted" of sexual harassment, all the while knowing through her Swiss counsel that her wrongly accusing him of being "convicted" constituted wilful defamation (art. 174 SCC) in Switzerland.

Litigating Defendant Lauren Reeves participated in the Swiss Attorney Defendants' illegal efforts to enforce a judgment against Plaintiff David for punitive damages which are not collectible in Switzerland. Defendant Reeves participated in the Swiss Attorney Defendants' illegal efforts to enforce a punitive damages award, knowing through her Swiss Attorneys that punitive damages are not collectible in Switzerland, as more fully detailed below.

Further, Defendant Khan wrongfully and illegally defamed Plaintiff David in Switzerland, alleging he had been "convicted" of sexual harassment, all the while knowing through her Swiss counsel that her wrongly accusing him of being "convicted" constituted wilful defamation (art. 174 SCC) in Switzerland.

### **Enterprise Allegations**

Plaintiff David and the Entity Plaintiffs restate paragraphs \_\_\_\_\_ through XXXX of this Complaint.

## **EXTORTION**

Title 18 U.S.C. Section §§875(d) criminalizes the conduct engaged in by Litigating Defendants Khan and Taylor. That statute provides as follows:

Whoever, with the intent to extort from any person, firm . . . or corporation, any money or other thing of value, transmits in interstate . . . commerce any communication containing any threat to injure the property or reputation of the addressee or of another . . . or any threat to accuse the addressee or any other person of a crime, shall be fined under this title or imprisoned not more than two years, or both.

**MOVE - Defendants Girardi, Allred, Bloom and their employees and agents - move.** Defendants Girardi, Allred and Bloom made threats intended to cause economic harm to Plaintiff David and to the Entity Plaintiffs and were intended to extort settlements. The threats were intended to cause reputational harm to Plaintiff David - those threats were wrongful because Defendants Girardi, Allred and Bloom used the threats and maligned Plaintiff David's reputation to try to obtain property and money to which they were not entitled.

Defendants Girardi, Allred and Bloom are guilty of extortion because they sought money or property to which they did not have, and could not reasonably believe they had, a claim or right.

Plaintiff David, accompanied by his attorney, Barry Rothman (Deceased),

went to the Beverly Hills Police Department and reported Elizabeth Taylor and Mahim Khan for trying to extort Plaintiff David by demanding \$ 2.2 Million and \$1.9 Million respectively. Rothman sent a letter to Detective Audra Alatorre, who advised Rothman to pursue the issue with the District Attorney:

BARRY K. ROTHMAN  
GORDON J. ZUIDERWEG  
MARTIN J. KOTOWSKI  
ROBIN B. RATNER  
LAWRENCE M. BOESCH  
LAWRENCE J. WALDINGER

LAW OFFICES OF  
**BARRY K. ROTHMAN**  
1901 AVENUE OF THE STARS  
SUITE 370  
LOS ANGELES, CALIFORNIA 90067

TELEPHONE: (310) 557-0062  
TELECOPIER: (310) 557-9080  
E-MAIL: BKR@BKRLEGAL.COM  
WWW.BKRLEGAL.COM

OF COUNSEL  
FREDERIC R. BRANDFON

March 30, 2016

**VIA E-MAIL**

[aalatorre@beverlyhills.org](mailto:aalatorre@beverlyhills.org)

Beverly Hills Police Department  
Attention: Detective Alatorre

**Re: Alki David / Taylor-Khan**

Dear Detective Alatorre:

Enclosed please find two separate Confidential Settlement Agreements and Releases, one executed by Elizabeth B. Taylor and the other executed by Mahim Khan, and as well executed by their attorneys.

Elizabeth Taylor has agreed to accept \$2.2 million not to prosecute criminal claims against Alki David. Mahim Khan has agreed to accept \$1.9 million not to prosecute criminal claims against Alki David.

I have circled and starred the relevant portions of the Agreement for your review.

Paragraph 5b. is particularly important.

The purpose of this letter is not for you to determine if Alki David is guilty of any of the asserted claims (which he isn't, and you have multiple third party declarations I gave you which betray Taylor-Khan's assertions), but rather to determine if Alki David is being extorted.

The enclosed Settlement Agreements have been fully drafted by opposing counsel.

I would like to meet with you upon the conclusion of your review.

Very truly yours,

LAW OFFICES OF BARRY K. ROTHMAN

Barry K. Rothman

BKR/cf  
Enclosure

cc: Alki David (via email w/enclosure)

Rothman sent a letter to the District Attorney, **INSERT** name of DA and attach the correspondence.

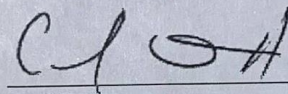
**MOVE - set forth with particularity Iqbal/Twombly - this occurred AFTER Taylor/Khan alleged extortion Defendants Girardi, Allred, Bloom and their employees and agents - move.** Defendants Girardi, Allred and Bloom made threats intended to cause economic harm to Plaintiff David and to the Entity Plaintiffs and were intended to extort settlements. The threats were intended to cause reputational harm to Plaintiff David - those threats were wrongful because Defendants Girardi, Allred and Bloom used the threats and maligned Plaintiff David's reputation to try to obtain property and money to which they were not entitled.

Defendants Girardi, Allred and Bloom are guilty of extortion because they sought money or property to which they did not have, and could not reasonably believe they had, a claim or right.

complained to me or told me that she was being sexually harassed or inappropriately touched. No one else at the offices ever told me that Ms. Khan was being sexually harassed or inappropriately touched

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in Beverly Hills, California, on January 28, 2016.

  
\_\_\_\_\_  
Carl Dawson

contractors, doctors, representatives, attorneys, insurers and employees, and that no party will initiate or pursue any other action or proceeding arising out of or relating to the Claims, Khan's employment with Defendants, or the facts alleged therein against Defendants, except as may be required to enforce this Agreement.

b. In consideration of the settlement sum and as a material inducement for the Defendants to enter into this Agreement, by the above language in paragraph 5a, Khan agrees not to initiate or pursue any criminal claims arising from or related to the Claims asserted by her in this matter. If criminal proceedings are initiated by a third party, Khan agrees to provide testimony only in compliance with the issuance of a validly served subpoena or Court order.

6. Confidentiality of Agreement:

a. Khan hereby states, represents, warrants, and agrees that the terms and conditions of the Agreement and each and every document and communication regarding the Agreement, including, but not limited to, the fact of and the amount of the payment required herein, are strictly confidential. Khan agrees that she will not seek or promote publicity nor cooperate in any efforts to promote or publicize any of the terms or conditions of the Agreement, including, but not limited to, the fact of and the amount of any of the payments required herein. Khan agrees not to disclose the settlement to any third person or third party and also agrees not to publicize the settlement in any forum or form, including but not limited to the identity of Defendants, the identity of Khan, the fact of and the amount of any of the payments required herein, including but not limited to any media outlet such as newspapers, magazines, television, radio, internet, websites, advertisements, blogs, as comments to existing internet postings, social media, or any other electronic media outlet.

b. Khan and Khan's Counsel further agree that, except as provided in this paragraph, they will not communicate, discuss, disclose, disseminate, or publish (1) the amount of the payment, whether generally or specifically, made by Defendants, or (2) the fact that Khan has received a payment in any amount from Defendants as a result of the Claims. Upon inquiry, Khan and her attorney agree to limit themselves to the following or to similar effect:

**"All claims have been amicably resolved by the parties."**

Notwithstanding the foregoing, Khan may communicate the terms of the Agreement if required by law. Khan will inform Defendants or their counsel in writing of the receipt of any subpoena compelling her to testify or produce documents concerning the terms of this Agreement and will immediately provide a copy of any such subpoena to Defendants or their counsel. Khan may also communicate the terms of the Agreement to her spouse or domestic partner (common law or legal), children, insurance carriers, legal counsel, tax advisors, accountants, health care providers, and as reasonably necessary for purposes of credit, housing, education, immigration, and governmental tax authorities provided that Khan first advises them of the confidentiality provisions of the Agreement in writing and secures their agreement, in

April 28, 2016

**VIA E-MAIL**  
[tfehr@akgllp.com](mailto:tfehr@akgllp.com)

Tracy Fehr

**VIA E-MAIL**  
[sam@gscleaverlaw.com](mailto:sam@gscleaverlaw.com)

Sam Cleaver

**Re: Alki David / Taylor-Khan**

Ms. Fehr and Mr. Cleaver:

Please be advised that the Settlement Agreement will not be executed by Mr. David. He has reviewed it, and he deems it to be extortionate.


As well, you should be advised that as a consequence thereof, I have communicated the Settlement Agreement to the Beverly Hills Police Department and the Los Angeles District Attorney's Office, who have reviewed it.

There will be no settlement. We have five Declarations from five individuals under penalty of perjury who worked at FilmOn and witnessed the events that occurred, all of whom attest to the fact that none of the claims that you have asserted have in fact occurred. You will receive the Declarations under separate cover.

All rights are reserved against each of you and your clients.

Very truly yours,

LAW OFFICES OF BARRY K. ROTHMAN

  
Barry K. Rothman

BKR/cf

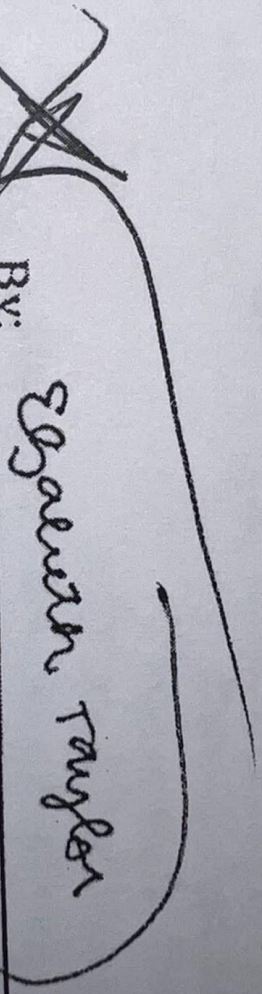
cc: Alki David (via e-mail)

21. Counterparts: This Settlement Agreement may be executed in counterparts, each shall be deemed an original. Additionally, the Parties understand and agree that a faxed signature shall be deemed an original signature for purposes of this Settlement Agreement.

The Settlement Parties

Dated: March 25, 2016

PLAINTIFF  
ELIZABETH TAYLOR

By:  \_\_\_\_\_

Elizabeth Taylor

Dated: March \_\_\_\_, 2016

DEFENDANTS  
ALKI DAVID PRODUCTIONS;

CONFIDENTIAL SETTLEMENT AGREEMENT AND RELEASE

This Settlement Agreement and Release (the "Agreement") is made by and between Plaintiff Elizabeth B. Taylor ("Taylor" or "Plaintiff"), an individual, on the one part, and Defendants Alki David Productions, Filmon.TV, Inc., Hologram USA, Inc., Anakando Media Group, and Alki David individually and any business entity owned or controlled in whole or in part directly or indirectly by Alki David ("Defendants") on the other part (Plaintiff and Defendant are hereinafter collectively referred to as the "Settlement Parties.")

Recitals

WHEREAS, on January 11, 2016, Plaintiff sent a letter to Defendants outlining the claims she would bring against Defendants in future litigation, including but not limited to, sexual harassment, sexual battery, assault and battery, retaliation, defamation, wrongful termination, false imprisonment, invasion of privacy, wiretapping, and wage and hour violations ("the Claims");

WHEREAS, Defendants dispute that they are liable for any damages and deny the allegations made in the Claims;

WHEREAS, the Settlement Parties wish to avoid the expense of further proceedings in the above matters and to resolve all issues which have been raised, could have been raised or which otherwise pertain to the January 11, 2016 letter, the facts alleged therein, the Claims, and any other aspects of the relationship between the Settlement Parties;

NOW, THEREFORE, in consideration of the covenants and agreements contained and the consideration described in this Agreement, the Settlement Parties do hereby agree as follows:

Covenants

1. No Admission of Liability: This Settlement Agreement and compliance with it may not be construed as an admission by any Party of any liability whatsoever or as an admission by any Party of any wrongdoing under any common law, statute or contractual obligation. Defendants specifically disclaim any wrongdoing and disclaim any liability to Taylor for any violation of law, regulation, duty, or contract, including but not limited to the facts alleged relating to the Claims or otherwise.

2. Consideration: After Defense counsel receives: (1) a completed W-9 from the Law Offices of G. Samuel Cleaver; and (2) a fully executed copy of this Agreement, Defendant will forward one settlement check, totaling Two Million Two Hundred Thousand dollars (\$2,200,000) (the "Settlement Sum") to the Law Offices of G. Samuel Cleaver payable to "Law Offices of G. Samuel Cleaver, Lawyers Trust Account" for which a 1099 shall be issued. The Settlement Sum represents payment for Plaintiff's physical and emotional injuries in this matter, and no amount of the Settlement Sum shall be characterized as wages. The check will be delivered to the Law Offices of G. Samuel Cleaver, as follows:

b. In consideration of the settlement sum and as a material inducement for the Defendants to enter into this Agreement, by the above language in paragraph 5a, Taylor agrees not to initiate or pursue any criminal claims arising from or related to the Claims asserted by her in this matter. If criminal proceedings are initiated by a third party, Taylor agrees to provide testimony only in compliance with the issuance of a validly served subpoena or Court order.

6. Confidentiality of Agreement:

a. Taylor hereby states, represents, warrants, and agrees that the terms and conditions of the Agreement and each and every document and communication regarding the Agreement, including, but not limited to, the fact of and the amount of the payment required herein, are strictly confidential. Taylor agrees that she will not seek or promote publicity nor cooperate in any efforts to promote or publicize any of the terms or conditions of the Agreement, including, but not limited to, the fact of and the amount of any of the payments required herein. Taylor agrees not to disclose the settlement to any third person or third party and also agrees not to publicize the settlement in any forum or form, including but not limited to the identity of Defendants, the identity of Taylor, the fact of and the amount of any of the payments required herein, including but not limited to any media outlet such as newspapers, magazines, television, radio, internet, websites, advertisements, blogs, as comments to existing internet postings, social media, or any other electronic media outlet.

b. Taylor and Taylor's Counsel further agree that, except as provided in this paragraph, they will not communicate, discuss, disclose, disseminate, or publish (1) the amount of the payment, whether generally or specifically, made by Defendants, or (2) the fact that Taylor has received a payment in any amount from Defendants as a result of the Claims. Upon inquiry, Taylor and her attorney agree to limit themselves to the following or to similar effect:

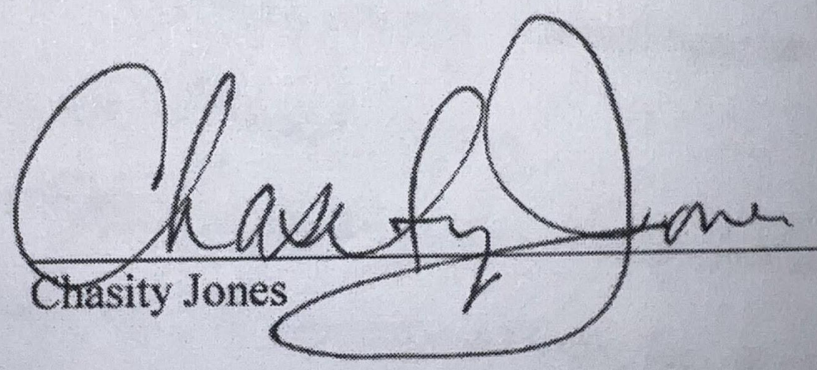
**"All claims have been amicably resolved by the parties."**

Notwithstanding the foregoing, Taylor may communicate the terms of the Agreement if required by law. Taylor will inform Defendants or their counsel in writing of the receipt of any subpoena compelling her to testify or produce documents concerning the terms of this Agreement and will immediately provide a copy of any such subpoena to Defendants or their counsel. Taylor may also communicate the terms of the Agreement to her spouse or domestic partner (common law or legal), children, insurance carriers, legal counsel, tax advisors, accountants, health care providers, and as reasonably necessary for purposes of credit, housing, education, immigration, and governmental tax authorities provided that Taylor first advises them of the confidentiality provisions of the Agreement in writing and secures their agreement, in writing, not to communicate, discuss, disclose, disseminate, or publish the terms and conditions of the Agreement, except as allowed hereby.

ng me, which she did.

alty of perjury under the laws of the State of California that the fo

ly Hills, California, on February 16, 2016.

  
Chasity Jones

Tay

**DECLARATION OF CHASITY JONES**

I, Chasity Jones, declare as follows:

1. This Declaration is based upon my personal knowledge and personal participation in the events described. If called to testify as a witness, I could and would testify competently as follows.

2. I am a Business Development Manager for FilmOn TV Networks, Inc. I held the same position with FilmOn TV Networks, Inc., in 2015 when Elizabeth B. Taylor was employed by FilmOn. I interacted with Elizabeth B. Taylor on a daily basis.

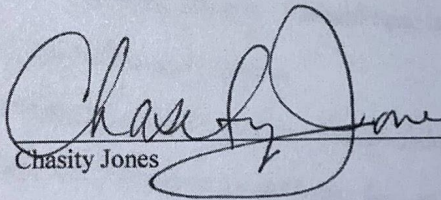
3. I understand that Elizabeth B. Taylor is accusing Alki David, the president and CEO of Film TV, Inc., and Alki David Productions, Inc., of sexual harassment, including inappropriate touching. I never observed any sexual harassment in regard to Ms. Taylor. I never observed Ms. Taylor being subjected to sexual advances, sexual conduct, or sexual comments by Mr. David or anyone else. I never observed Mr. David inappropriately touching Ms. Taylor or using crude language around her or in any way acting inappropriately around her. I never observed anyone inappropriately touching Ms. Taylor or acting inappropriately around her. Although Ms. Taylor told me after she left FilmOn that she had been sexually harassed while at FilmOn as set forth in Paragraph 4 below, while she worked at FilmOn, Elizabeth B. Taylor never complained to me or told me that she was being sexually harassed or inappropriately touched. No one else at our offices ever told me that Ms. Taylor was being sexually harassed or inappropriately touched. I understand that Ms. Taylor is saying that Mr. David would invite her into his office, close the door, and then sexually harass her. On multiple occasions, I observed Ms. Taylor enter Mr. David's office and close the door, and then Mr. David immediately open the door.



4. After Elizabeth B. Taylor was terminated in June 2015, Ms. Taylor contacted me on multiple occasions via text messaging. Ms. Taylor asked me to testify that I had witnessed Alki David sexually harass Ms. Taylor "to make her case bigger." I have never been sexually harassed by Mr. David. I once again told Ms. Taylor that I would not testify or be a part of her case. I finally asked her to stop contacting me, which she did.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in Beverly Hills, California, on February 16, 2016.

  
Chasity Jones

### **DECLARATION OF GARY SHOEFIELD**

I, Gary Shoefield, declare as follows:

1. This Declaration is based upon my personal knowledge and personal participation in the events described. If called to testify as a witness, I could and would testify competently as follows.
2. I work for FilmOnTV, Inc., and Hologram USA as an entertainment consultant. I was so employed when Elizabeth B. Taylor and Mahim Khan were employed by FilmOn TV, Inc. I occasionally interacted with Elizabeth B. Taylor and Mahim Khan when they worked directly for me.
3. I understand that Elizabeth B. Taylor is accusing Alki David, the president and CEO of Film TV, Inc., and Alki David Productions, Inc., of sexual harassment, including inappropriate touching. I never observed any sexual harassment in regard to Ms. Taylor. I never observed Ms. Taylor being subjected to sexual advances, sexual conduct, or sexual comments by Mr. David or anyone else. I never observed Mr. David inappropriately touching Ms. Taylor or using crude language around her or in any way acting inappropriately around her. I never observed anyone inappropriately touching Ms. Taylor or acting inappropriately around her.
4. At one point, Mahim Khan came to me to complain that someone at FilmOn TV was sexually harassing her, including touching her breasts. I asked her to give that person's name to me, and told her that I would speak to that person and make sure that it stopped. I also told her to go to Yelena Calendar in human resources and file a sexual harassment complaint. Ms. Khan never did either. She never permitted me to talk to the person allegedly sexually harassing her, and she never went to Ms. Calendar in human resources to file a complaint. I never understood why Ms. Taylor

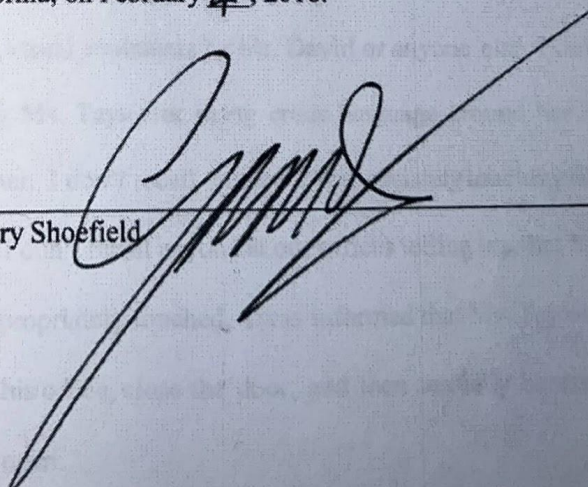
would make such a claim and not allow me to take action on her behalf or why she never pursued the incident herself.

5. I understand that Mahim Khan is also accusing Alki David of sexual harassment, including inappropriate touching. I never observed any sexual harassment in regard to Ms. Khan. I never observed Ms. Khan being subjected to sexual advances, sexual conduct, or sexual comments by Mr. David or anyone else. I never observed Mr. David inappropriately touching Ms. Khan or using crude language around her or in any way acting inappropriately around her. I never observed anyone inappropriately touch Ms. Khan or act inappropriately around her. No one else at the offices ever told me that Ms. Khan was being sexually harassed or inappropriately touched

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in Beverly Hills, California, on February 4<sup>th</sup>, 2016.

Gary Shoefield

A handwritten signature in black ink, appearing to read 'Gary Shoefield', is written over a horizontal line. The signature is stylized and cursive.

**DECLARATION OF MARIA NETSVETAeva**

I, Maria Netsvetaeva, declare as follows:

1. This Declaration is based upon my personal knowledge and personal participation in the events described. If called to testify as a witness, I could and would testify competently as follows.
2. I work for FilmOnTV, Inc., as an operations manager. I worked for FilmOnTV, Inc., when Elizabeth B. Taylor and Mahim Khan were employed by FilmOnTV, Inc. I interacted with Elizabeth B. Taylor and Mahim Khan on a daily basis. I can partially see Alki David's office from my desk.
3. Ms. Taylor was often highly emotional and dramatic. Ms. Taylor often cried and complained.
4. I was informed that Elizabeth B. Taylor is accusing Alki David, the president and CEO of Film TV, Inc., and Alki David Productions, Inc., of sexual harassment. I never observed any sexual harassment in regard to Ms. Taylor. I never observed Ms. Taylor being subjected to sexual advances, sexual conduct, or sexual comments by Mr. David or anyone else. I don't recall Mr. David inappropriately touching Ms. Taylor or using crude language around her or in any way acting inappropriately around her. I don't recall anyone inappropriately touching Ms. Taylor or acting inappropriately around her. I don't recall anyone at our offices telling me that Ms. Taylor was being sexually harassed or inappropriately touched. I was informed that Ms. Taylor is saying that Mr. David would invite her into his office, close the door, and then sexually harass her. Mr. David usually keeps his office door open.

5. I was informed that Mahim Khan is also accusing Alki David of sexual harassment. I never observed any sexual harassment in regard to Ms. Khan. I never observed Ms. Khan being subjected to sexual advances, sexual conduct, or sexual comments by Mr. David or anyone else. I don't recall Mr. David inappropriately touching Ms. Khan or using crude language around her or in any way acting inappropriately around her. I don't recall anyone inappropriately touching Ms. Khan or act inappropriately around her. I don't recall anyone at the offices telling me that Ms. Khan was being sexually harassed or inappropriately touched. Ms. Khan did complain that she was not happy with her role. I was informed that she eventually did quit without warning. She just did not appear for work one day. I believe that she quit because she was unhappy.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed in Beverly Hills, California, on February 4, 2016.

  
\_\_\_\_\_  
Maria Netsvetaeva

**LAW OFFICES OF BARRY K. ROTHMAN**

**From:** Yelena Calendar [yelena@filmon.com]  
**Sent:** Tuesday, February 16, 2016 12:46 PM  
**To:** 'FilmOn LiveTV'; 'LAW OFFICES OF BARRY K. ROTHMAN'  
**Subject:** FW: Elizabeth Taylor Experience (Wil Master)  
**Attachments:** ~WRD000.jpg; image001.jpg; image002.jpg

Hi Alki and Barry,

Please see below a letter from one of our employees who had a bad experience with Elizabeth Taylor, depicting her erratic behavior.

Thank You,  
Yelena

---

**From:** Carl Dawson [mailto:carl.dawson@filmon.com]  
**Sent:** Thursday, February 11, 2016 9:04 AM  
**To:** 'Yelena Calendar' <yelena@filmon.com>  
**Cc:** 'FilmOn TV' <wil.master@filmon.com>  
**Subject:** FW: Elizabeth Taylor Experience (Wil Master)

**From:** Wil Master [mailto:iwilmaster@gmail.com]  
**Sent:** Thursday, February 11, 2016 12:41 AM  
**To:** Carl Dawson <carl.dawson@filmon.com>  
**Subject:** Elizabeth Taylor Experience

To whom it may concern,

My experience/history with Elizabeth Taylor was very interesting to say the least.

Generally, she appeared to be very sweet although she was very swayed by her environment & basic life circumstances. She was erratically emotional: very happy one moment from a to crying moments later, from confidently offering advice to insecurely falling into a paranoid or jealous rage. She was very unpredictable (in a concerning way).

Because of this and because she asked, I would often provide her with basic life advice/coaching as I wanted to help her find her way and win. It was successful at times although mostly very challenging.

I continued to support her until a series of invasive and manipulative advances towards me and highly vindictive actions left me no choice but to distance myself from her.

Here's a brief history:

1. When she learned about a Multi-Million Dollar deal I was working on, Elizabeth showed up at my desk, looked up at me "starry-eyed" (and in front of everyone), knelt down on both knees and asked: "would you marry me?" and presented me with a ring (of candy).

I was very confused and mildly amused, but as she held on to this moment, it became very unnerving. I didn't want her to feel foolish so I played along with jokes until it seemed that our colleagues believed that she was just playing around. I "coached" her away and continued with my work.

2. Before I knew it, Elizabeth was back, but this time inside my work station and "skillfully" spilled her coffee on my desk, computer and rug where she remained in my space for a few hours "cleaning," flirting and apologizing. I assured her it was okay and actually handled most of the cleaning myself. The mood in the whole area reverted back to concern (for me, but for her too - I believed).

Basically, she voluntarily rolled a chair in my workspace and moved onto my desk and said something like, "Well we are partners now." I calmly endured this for hours. Eventually she left with a "Bye husband."

3. Random happy/sad/laughing crying moments continue for weeks (I believe), and we all did our best to support her AND then one time, Elizabeth invited herself to lunch where i was with some other colleagues. At one point, Elizabeth said that she had to go to the bank, but her phone was out of battery and was afraid that she would be helpless in the event of an earthquake.

Appealing to knowing my experience as a First Responder, Elizabeth asked to use my phone, and I said OK but only if she agreed to only use it in the event of an emergency. When she returned, she began historically yelling/complaining that everyone was getting fired and that she believed that someone was referring to her as the devil because she read a bunch of my texts (unauthorized).

For some reason, Elizabeth thought the texts were about her. They were not. I actually calmed her down and showed her the texts: One said, "The devils in the details," a common term in business negotiations and other was a Buddhist quote that advised on how to challenge "devilish functions" and win in life. Neither of these texts were written to, from or about her, but she was not "buying" it and kept up with this erratic behavior.

I got very serious and offered some very strict guidance about what she had just done and how her reading my texts where a violation of trust and a slandering of my compassion for helping her out. It was strict, but not mean. It was clear that she was taking advantage of my good nature and "borrowed" my phone to "spy" into my texts.

She unwarrantedly and frantically ran back to the office crying and said (to a various colleagues) that I was mean to her and made her cry. She was again clearly manipulating others to build a case against me. She succeeded with a few uninformed and easily manipulated people, but the people who knew me and separately, Elizabeth, including myself, realized there was a very "sick" person running amuck in our office.

4. From that point onward, she continued to act paranoid, anxious and negative about everything. She interrupted every single sales rep and shot down everyone's ideas in sales meetings including those of our CEO. She was certainly devolving and isolating herself from everyone. Many, including myself were very concerned about Elizabeth.

In one such meeting and in front of everyone (including the Sales Manager), Elizabeth threatened to

call one of my contacts and "run any chances with the client" because her boyfriend knew the guy.

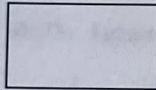
Unrelated to any of this, my office and new initiative moved across the street to another building and didn't have any further contact with Elizabeth.

Further, when I learned she had been fired, I believe I sent her a text and offered encouragement and best wishes into her next position. She never responded and that was the last I heard about Elizabeth.

In conclusion, this a factual portrayal of my experience with Elizabeth Taylor, and I have nothing to gain other than the hope that this will shed light on the real concern that I had for Elizabeth, and that she gets the help she still may need and certainly deserves :-)

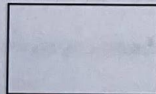
Thank you.

Wil Master



**i WIL MASTER**

301 N. Canon Drive  
Beverly Hills, CA 9021  
0  
USA



T: +1.213.290.6468  
SKYPE: iwilmaster

**Global Business &  
Social Media  
Gateway**

**: i  
WILMASTER**

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This non-binding email is intended solely to facilitate discussions among the parties. This email is not intended to create nor will it be deemed to create a legally binding or enforceable offer, agreement or the like of any type or nature. Neither party will have any obligation or liability as to the matters described herein unless and until the duly authorized representatives of the parties execute a written definitive agreement as to such matters and neither party will have any liability for any failure or refusal to execute a definitive agreement for any reason.

The information contained in this e-mail (and all attachments) is for the exclusive use of the intended recipient(s) and may be confidential, proprietary, and/or legally privileged. Inadvertent disclosure of this message does not constitute a waiver of any privilege. If you receive this message in error, please do not directly or indirectly use, print, copy, forward, or disclose any part of this message. Please also delete this e-mail and all copies and notify the sender. Thank you.

### DECLARATION OF MARY RIZZO

I, Mary Rizzo, declare as follows:

1. This Declaration is based upon my personal knowledge and personal participation in the events described. If called to testify as a witness, I could and would testify competently as follows.

2. I am employed by Filmon, TV, Inc. I have been employed by FilmOn TV, Inc., for about one year. I started as a sales representative, but I am now an advertising account manager. For six months, my desk was next to that of Elizabeth B. Taylor. During that time, I interacted with Elizabeth B. Taylor on a daily basis. For about six weeks, my desk was next to that of Mahim Khan. During that time, I interacted with Mahim Khan on a daily basis.

3. Elizabeth B. Taylor was very emotional and would often complain. Mahim Khan liked to gossip about people in the office. On multiple occasions she would complain about her job and she didn't go to school to be a personal assistant. I would hear her often say that she wanted to quit because she was unhappy with her job position.

4. I understand that Elizabeth B. Taylor and Mahim Khan are accusing Alki David, the president and CEO of Film TV, Inc., and Alki David Productions, Inc., of sexual harassment, including inappropriate touching. I was surprised when I heard this.

5. I do not recall any sexual harassment in regard to Elizabeth Taylor. I do not recall Ms. Taylor being subjected to sexual advances, sexual conduct, or sexual comments by Mr. David or anyone else. I do not recall Mr. David inappropriately touching Ms. Taylor or using crude language around her or in any way acting inappropriately around her. I do not recall anyone inappropriately touching Ms. Taylor or acting inappropriately around her. While at FilmOn,

Elizabeth B. Taylor never complained to me or told me that she was being sexually harassed or inappropriately touched. No one else at our offices ever told me that Ms. Taylor was being sexually harassed or inappropriately touched. After Ms. Taylor was terminated, she texted me stating that Mr. David had touched her and that she was getting an attorney to sue Mr. David. This was the first time Ms. Taylor had told me or indicated to me that she had been sexually harassed or inappropriately touched by Mr. David. On another occasion on text, I told Ms. Taylor that she needed to give me back my belongings that I lent her and never received back. I also told her over the text that she needed to seek help because how she was replying was threatening. I understand that Ms. Taylor is saying that Mr. David would invite her into his office, close the door, and then sexually harass her. It appears to me to be highly unlikely that Mr. David would invite Ms. Taylor into his office and then close the door. On one occasion, I observed Ms. Taylor enter Mr. David's office and close the door. Mr. David immediately reopened the door.

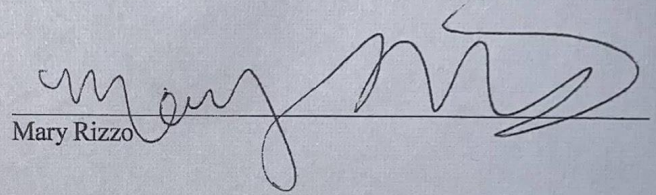
6. I understand that Mahim Khan is also accusing Alki David of sexual harassment, including inappropriate touching. I do not recall any sexual harassment in regard to Ms. Khan. I never observed Ms. Khan being subjected to sexual advances, sexual conduct, or sexual comments by Mr. David or anyone else. I do not recall Mr. David inappropriately touching Ms. Khan or using crude language around her or in any way acting inappropriately around her. I do not recall anyone inappropriately touching Ms. Khan or acting inappropriately around her. Mahim Khan never complained to me or told me that she was being sexually harassed or inappropriately touched. No one else at the offices ever told me that Ms. Khan was being sexually harassed or inappropriately touched

//

I declare under penalty of perjury under the laws of the State of California that the foregoing  
is true and correct.

Executed in Beverly Hills, California, on February 8, 2016.

Mary Rizzo

A handwritten signature in black ink, appearing to read "Mary Rizzo", written over a horizontal line. The signature is stylized and cursive.

Rothman sent a letter to the District Attorney, **INSERT** name of DA and attach the correspondence.

**MOVE - set forth with particularity Iqbal/Twombly - this occurred AFTER Taylor/Khan alleged extortion Defendants Girardi, Allred, Bloom and their employees and agents - move.** Defendants Girardi, Allred and Bloom made threats intended to cause economic harm to Plaintiff David and to the Entity Plaintiffs and were intended to extort settlements. The threats were intended to cause reputational harm to Plaintiff David - those threats were wrongful because Defendants Girardi, Allred and Bloom used the threats and maligned Plaintiff David's reputation to try to obtain property and money to which they were not entitled.

Defendants Girardi, Allred and Bloom are guilty of extortion because they sought money or property to which they did not have, and could not reasonably believe they had, a claim or right.

Plaintiff David and the Entity Plaintiffs suffered damages and incurred substantial losses as a result of Defendants Girardi, Allred, Bloom's, Goldberg's and Chora's implementation and continuation of the extortion.

The Defendant Attorneys tampered with the Litigating Defendants' testimony, and with the evidence that Defendant Attorneys used to assert the

spurious complaints made by Defendant Litigants, all with an effort to extort money from Plaintiff David and the Plaintiff Entities. **We need to add specificity here.**

The Attorney Defendants' conspiring to extort, and their extorting, money and property from Plaintiff David and the Attorney Defendants, and the Attorney Defendants tampering with witnesses by telling them what to say, and Defendant Goldberg wilfully obstructing justice by introducing documents and exhibits that were not produced properly into evidence, and Defendant Goldberg falsifying the signature of Plaintiff's Counsel Ellyn Garofalo, all were actions committed under the auspices of otherwise legitimate enterprises, including Allred, Maroko & Goldberg; Bloom Law Firm; Girardi Keese; Dordick Law Corporation; Chora, Young & Manasserian and The Law Offices of Ebby S. Bakhtiar.

Accordingly, Plaintiff David and the Entity Defendants sue all Attorney Defendants for injuries to Plaintiff David's and the Entity Plaintiffs' businesses and properties directly and proximately caused by reason of the Attorney Defendants' extortion, a predicate claim pursuant to RICO.

Further, the United States-Based Attorney Defendants', Defendant Swiss Attorneys' and Litigating Defendants' RICO violations constitute extortion aimed at taking Plaintiff David's and the Entity Plaintiffs' property and money through wrongful means, 18 U.S.C. § 1951(a), which, in relevant part, involves "the

obtaining of property from another, with his consent, induced by wrongful use of actual or threatened force, or violence.”

Specifically, the Attorney Defendants Girardi, Allred, Goldberg, and Bloom (Initial Enterprise Defendants), established the initial enterprise when they filed a series of unethical, spurious lawsuits against Plaintiff David and the Plaintiff Entities, without investigating the merits of those actions, with the goal of extracting money and property from Plaintiff David and the Entity Plaintiffs. To further the enterprise, the Initial Enterprise Defendants unethically coached clients and witnesses about what to say so as to bolster the Attorney Defendants’ filed spurious lawsuits and/or make unreasonable and unfounded settlement demands against Plaintiff David and the Entity Plaintiffs.

Further, Plaintiffs allege that the United States-Based Attorney Defendants continue to do so, by, inter alia, wilfully and intentionally conspiring against Plaintiff David and the Entity Plaintiffs, by filing spurious lawsuits against Plaintiff David and the Entity Plaintiffs, who were and continue to be, victimized by Attorney Defendants’ continuous pattern of racketeering conducted to benefit their enterprise, including wire fraud, mail fraud, extortion, tampering with witnesses and witness and evidence lists, as well as with evidence itself, obstruction of justice, including Defendant Goldberg’s falsification of a signature in a civil proceeding in the *Khan* case, as more fully discussed herein, bribery, and

aiding and abetting, all cognizable as RICO predicate acts pursuant to 18 U.S.C. §§ 1862(b)(c) and (d).

The Defendant United States-Based Attorneys' prohibited acts were continuous and interrelated having similar goals - extorting money from Plaintiff David and the Entity Plaintiffs, and defaming Plaintiff David and the Entity Plaintiffs. Defendant United States-Based Attorneys' enterprise actions had similar purposes, as alleged herein in more detail: to enrich the United States-Based Attorney Defendants by extorting Plaintiff David's and the Entity Plaintiffs' money and property and by seeking to malign and defame Plaintiff David and the Entity Plaintiffs.<sup>2</sup>

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<sup>2</sup> **Note to Counsel:** The Attorney Defendants' and the Individual Defendants' RICO violations that cannot be characterized in a RICO Action as supporting a Tampering with Witnesses, 18 U.S.C. §1512(b) violation as those Defendants' actions did not involve federal court proceedings. 18 U.S.C. §1512(b) prohibits the corrupt persuasion of another person with an intent to impede an "Official Proceeding" which is defined, in relevant part, in the RICO statutes as a proceeding in a federal court, or a federal administrative tribunal.

Nevertheless, case law in the Ninth Circuit discusses "corrupt persuasion," the phrase used in 18 U.S.C. §1512(b), which encompasses what Defendant United States-Based Attorneys have done ~ coaching witnesses about how to testify, without conducting any due diligence to verify the allegations and wire and mail fraud committed with the intent to defraud and to cause the loss of money and property belonging to Plaintiffs. As to Defendant Allred, this pattern of manipulating witnesses, and, upon information and belief, paying some of the witnesses to testify in a particular fashion, is a pattern of obstruction of justice and witness tampering that is more than fifty years old. In the landmark Supreme Court Case, *Roe v. Wade*, upon information and belief, Defendant Allred coached Plaintiff Roe about what to testify about without verifying the allegations. Allred thereby commenced her pattern of committing obstruction of justice and tampering with witnesses, as evidenced by Plaintiff Roe's informing, soon before she died, that

**MOVE: Despite Numerous Recusal Requests Biased Judges Refused to Recuse to Provide Plaintiff David and the Entity Plaintiffs with Due Process and Judicial Impartiality**

**Petition for Rehearing conformed (2).pdf - Alki to insert a link.**

Orozco was partners with the Judge that signed the appellate decision from which Plaintiff David and the Entity Plaintiffs are seeking review from the California Supreme Court and there is a close nexus between Gloria Allred and Judge Michelle Court.

Upon information and belief, at all relevant times, Defendant Attorneys were individual persons within the meaning of 18 U.S.C. §§1961(4) and 1962(e), and Defendant Attorneys and Does 1-25 constituted an enterprise pursuant to 18 U.S.C. §§ 1961(4), 1962(e), that associated with and/or participated in the conduct of said enterprise's affairs doing business in the form of an association in fact.

Defendant Attorneys in their individual capacities, conducted, participated in, conspired to engage in, or aided and abetted the continuing and ongoing conduct of the affairs of that enterprise, together with others, through a pattern of racketeering as defined in 18 U.S.C. §§ 1961(1), 1961 (5), and 1962(c).

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Allred committed those acts. See [Gloria Allred On The New Norma McCorvey Documentary \(forbes.com\)](#). **Strategy Question:** Does counsel want to reference corrupt persuasion to characterize The United States-Based Defendant Attorneys' actions even though we cannot allege the federal witness tampering? I ask because the phrase "corrupt persuasion" is so very, very apt here.

**Strategy Question:** Shall the Plaintiffs allege tampering with witnesses as a separate count. California Penal Code 136.1 PC (makes it a crime in California to dissuade, intimidate or tamper with a witness to (or a victim of) a crime, or from otherwise cooperating with police or prosecutors).

There is a strong threat that Defendant Attorneys' continuing criminal activity furthering their enterprise will extend beyond the initial period of time when the predicate acts commenced, because litigation continues in the lawsuits filed by Elizabeth Taylor and Jane Doe, and the Khan case is on appeal. The Petition for Review before the California Supreme Court was filed on July 6, 2022. *Mahim Khan, Plaintiff and Respondent, v. Hologram USA, Inc. et al., Defendants and Appellants*, Case No. 2nd Civ. Case No. B308727 c/w B305849 (LASC Case No. BC654017)(Appealing from the Decision of the Court of Appeal Second Appellate District, Division Two). **LINK TO PETITION FOR REVIEW**

Further, as alleged in this Complaint, the illegal collection efforts by United States-Based Attorney Defendants Allred, Bloom and Chora and the Swiss Attorney Defendants also are illegal because those Attorneys illegally attempted to collect money and property from Plaintiff Defendant and the Entity Plaintiffs and also tortiously defamed Plaintiff David in both the United Kingdom and Switzerland and committed corporate defamation against the Entity Defendants.

### **FACTS COMMON TO ALL ALLEGATIONS**

#### **Defendant Attorneys Conspire and File a Tsunami of Me Too Claims Against Plaintiff Alki David**

Plaintiff David first met Defendants Allred and Bloom when the three of them appeared on the Dr. Drew Show on December 4, 2012. Upon information and belief, from that day forward, Defendants Allred and Bloom viewed Plaintiff David

as a possible target to attack in the future with spurious lawsuits alleging that David harmed Litigating Defendants, just as Defendants Allred and Bloom have targeted many others, as more fully discussed herein.<sup>3</sup>

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<sup>3</sup> **Note:** Girardi was disbarred on July 1, 2022.

<https://apps.calbar.ca.gov/licensee/Detail/36603>.

**Strategy Question:** Girardi is in personal bankruptcy, so the stay most likely will preclude suing him personally. Further he is in messy divorce proceedings. In December, 2020, involuntary Chapter 7 Bankruptcy proceedings were filed against Girardi's law firm, Girardi & Keese. The firm became defunct on or near January, 2021 and its assets were sold by the bankruptcy trustee. *Tom Girardi's Law Office will be sold, as his home goes on the market, Trustee tells Court, by Amanda Bronstad, The Recorder, April 27, 2021.* Robert Keese, who helped Defendant Girardi found the Girardi & Keese law firm in 1965, also has been placed on involuntary inactive status and is not eligible to practice law.

<https://apps.calbar.ca.gov/licensee/Detail/46858>.

**Strategy Question:** Given these complications with Girardi, I have named him as an individual and a member of his marital estate and have otherwise included references to him in the complaint with regard to averments regarding the enterprise and continuous activity? I have also named Erica Girardi a/k/a Erica Jayne as a Defendant as she is part of the criminal enterprise. Note: Girardi's former partner, Keith Griffin, has joined the Dordick Law Firm, whose principal is Defendant Gary A. Dordick.



**Gloria Allred (left/right) Lisa Bloom, Alki David, Kato Kaelin, Dr. Drew**

**Note to Counsel:** Ali's affidavit will establish that she saw other Plaintiffs contrive claims by constantly entering Plaintiff David's office in hopes of enticing him to commit sexually offensive conduct. Carl Dawson's affidavit will also establish that employees and former employees of the Entity Plaintiffs contrived to target Plaintiff David and the Entity Plaintiffs.

Monica D'Oofrio filed *D'Onofrio v. Alki David Productions Inc., FilmOn Com., Inc. and Alki David, Case No. BC496165*<sup>3</sup> on November 6, 2012, alleging employment discrimination. Plaintiff David strongly denied any liability, but made a business decision to settle the case for a minimal amount. The case was dismissed in 2013 in a settlement agreement that had a confidentiality provision. Upon

information and belief, with the urging of Defendant Attorneys, various conspiring and colluding employees and ex-employees subsequently filed false claims against Plaintiff David and some of the Entity Plaintiffs.

Current and former employees of the Entity Plaintiffs, encouraged and aided and abetted by the Defendant Attorneys,<sup>4</sup> targeted Plaintiff David as a defendant to name in spurious lawsuits and targeted the Entity Plaintiffs. Former employees and their counsel deemed Plaintiff David to be a deep pocket from whom they could extort monies.

In filing this lawsuit - Plaintiff David and the Plaintiff Entities seek justice to recoup millions of dollars, consisting of lost profits, improperly obtained court judgments, and lost profitable contracts, as well damages attributable to Plaintiff David's two IPO's failing. (Insert IPO's for FilmOn and XXXXX). **Note: Yelena was CONTROLLER and she had a very strong grasp on finances and taxes so we are getting an affidavit from her in this regard.**

Upon information and belief, Attorney Defendants Girardi, Allred, Bloom, Goldberg, Deitrich and Griffin conspired to pursue vexatious litigation creating a continuous and related pattern of racketeering activity against Plaintiff David and

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<sup>4</sup> **Note to Counsel:** Ali's affidavit will establish that she saw other Defendants contrive claims by constantly entering Plaintiff David's office in hopes of enticing him to commit sexually offensive conduct. Carl Dawson's affidavit will also establish that employees and former employees of the Entity Plaintiffs contrived to target Plaintiff David and the Entity Plaintiffs.

the Entity Plaintiffs by filing numerous spurious and unfounded lawsuits against Plaintiff David and the Entity Plaintiffs. Soon thereafter, other Attorney Defendants joined the enterprise, including, but not limited to, Attorney Defendants Leal, Mochkatel, Goldstein, Griffin, and Bakhtiar, thus expanding the illegal racketeering enterprise and increasing the damages sustained by Plaintiffs David and The Entity Plaintiffs.

The US Based Attorney Defendants were enabled by one another and their retained experts to assist them in committing the RICO predicate offenses of extortion, bribery, obstruction of justice, wire fraud, mail fraud and aiding and abetting solely because of each U.S. Based Attorney Defendants' position in the enterprise and their involvement in and/or control over the enterprise's affairs and because their offenses of extortion, bribery, obstruction of justice, wire, mail fraud and aiding and abetting are related to the activities of their enterprise, *i.e.*, to enrich themselves by filing spurious lawsuits against Plaintiff David and the Entity Plaintiffs, thereby depriving those Plaintiffs of their property and money.

Upon information and belief, (**Allie and Carl Affidavits provide this good faith basis**) Defendants Girardi, Allred, and Bloom intentionally conspired to recruit employees of Plaintiff Entities and former employees of those Plaintiff Entities, to independently file tort lawsuits against Plaintiff David, alleging he committed sexual misconduct and/or that those Plaintiffs had viable employment

law claims against Plaintiff Entities in order to extract and extort money from Plaintiff David and the Entity Plaintiffs in furtherance of an enterprise specifically designed to enrich Attorney Defendants.

Defendants Attorneys Allred and Bloom's extortionate tactics are systemic and know no bounds, as evidenced by this Complaint, which establishes that many prominent citizens are victimized by Allred's and Bloom's predatory targeting of prominent people, whom they victimize, all the while alleging that their clients are "victims."

**Defendants Allred and Bloom are the actual predators** who consistently utilize the same criminal enterprise modus operandi, *i.e.*, name and shame - as alleged herein. Defendant Attorneys Allred and Bloom have targeted everyone from Princess Latifa to 50 Cent, from Alan Dershowitz to Rose McGowan, from Chris Brown to Steve Wynn, to Plaintiff David and the Entity Plaintiffs. After targeting those victims, Defendant Attorneys Allred and Bloom maliciously fabricate fallacious testimony, with the intent to extort money and property from their targets to further their criminal enterprise.

### **The Parade of Spurious Lawsuits Filed to Further The Enterprise's Goals**

On September 30, 2020, Jane Doe (Rita Nichols) filed a Labor-Wrongful termination lawsuit in Los Angeles County Superior Court against Plaintiffs David, FilmOn TV Networks, Inc., FilmOn TV La Inc. SwissX Labs AG Inc. a California

Corp. AKA Swiss Lounge; Hologram USA Entertainment Inc.; FilmOn TV Inc. Hologram USA Inc. a California Corp. AKA Hologram USA Productions Inc; SwissX Labs AG Inc. AKA SwissX Lounge AKA FilmOn UK Ltd; Hologram USA Inc. AKA Hologram USA Productions Inc. AKA Hologram USA Entertainment Inc. AKA FilmOn TV Inc. AKA FilmOn.Tv La. Inc. LASC Case No. 20STCV37498.

Defendant Doe's attorneys in that action are Attorney Defendants Girardi, Bakhtiar and Dordick. The case is still pending.

Defendant Attorneys also filed lawsuits on behalf of Litigating Defendants Elizabeth Taylor (represented by Defendant Attorney Goldstein, Bloom, Chora); Chastity Jones (represented by Attorney Defendants Bloom, Sarah Bloom of the Bloom Firm, and Attorney Defendants Fundali, Goldstein of the Bloom Law Firm and Attorney Defendant Chora); Mahim Khan, (LASC Case No. BC654017) (represented by Defendant Attorneys Allred, Maroko & Goldberg, Allred, Goldberg, Leal and Mochkatel;) and Lauren Reeves (represented by Defendant Attorney Allred). **INSERT CASE NUMBERS**

Attorney Defendants Girardi, Allred, Goldberg, Goldstein, Leal, Mochkatel, Bloom, Fudalli, Chora, Warshavsky, Gillieron, Theintz, and Chabrier Avocats, SA and their agents mercilessly and maliciously pursued Plaintiff David and the Entity Plaintiffs in courts, as well as in the media, seeking to extort Plaintiff David so that

he would pay expeditiously money to settle with the parties who sued Plaintiff David and the Entity Plaintiffs.

Plaintiffs assert, pursuant to 18 U.S.C. §§1962(b)(c) and (d), that the Attorney Defendants, their clients (The Litigating Defendants), their experts, employees and agents, conspired with one another and intended to conduct, and wilfully conducted, an interrelated, clear and continuous pattern of racketeering activity to benefit Defendant Attorneys' unlawful enterprise.

In Mary Rizzo's deposition conducted by Attorney Defendant Bloom in the *Chastity Jones* case, Rizzo discussed a long chain of text messages between Rizzo and Jones evincing that the Litigating Defendants conspired to contrive claims against Plaintiff David and the Entity Plaintiffs.

**For the Court's convenience, here is a dropbox link to these texts:**

**<https://drive.google.com/file/d/14IX-XfL3oOGUS9MV4-zd3GXt0WTE1g3M/view?usp=sharing>**.

As more fully alleged herein, they did so in their modus operandi of naming and shaming Plaintiff David - as they have many other well-known targets and the fabricating a constellation of facts and all aspects necessary to prosecute a contrived lawsuit from false and biased witnesses, to non-meritorious and ill-informed testimony by experts, to incomplete and inaccurate witness and exhibit lists and trial evidence. Plaintiffs have evidence to prove this modus operandi.

Specifically, the Attorney Defendants Girardi, Allred, Goldberg, and Bloom (Initial Enterprise Defendants), established the initial enterprise when they filed a series of unethical, spurious lawsuits against Plaintiff David and the Plaintiff Entities, without investigating the merits of those actions with the goal of extracting money and property from Plaintiff David. To further the enterprise, the Initial Enterprise Defendants unethically coached clients and witnesses about what to say to bolster the Attorney Defendants' filed spurious lawsuits and/or make unreasonable and unfounded settlement demands against Plaintiff David and the Entity Plaintiffs.

Further, Plaintiffs allege that the Attorney Defendants continue to do so, by, inter alia, wilfully and intentionally conspiring against Plaintiff David and the Entity Plaintiffs, by filing spurious lawsuits against Plaintiff David and the Entity Plaintiffs, who were and continue to be, victimized by Attorney Defendants' continuous pattern of racketeering conducted to benefit their enterprise, including wire fraud, mail fraud, extortion, tampering with witnesses and witness and evidence lists, as well as with evidence itself, obstruction of justice.

**Litigating Defendants' Conspiracy to Target Plaintiff David and The Entity Plaintiffs ~ A Conspiracy Facilitated by the Defendant Attorneys**

Upon Information and Belief the Litigating Defendants met at a restaurant near Plaintiff Entity Hologram, Inc.,'s location at least once to collude, conspire

and form untruthful allegations against Plaintiff David and the Entity Defendants. Upon information and belief, the Litigating Defendants, coached by the Attorney Defendants, also met at other various times to compare theories for asserting spurious and trumped-up claims against Plaintiff David and the Entity Defendants.

The Litigating Defendants who are current and former employees of the Entity

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<sup>5</sup> Rizzo's Deposition and her trial testimony in the *Jones* trial establish that after the Rizzo Settlement with Plaintiff David and the Entity Plaintiffs, The Litigating Defendants conspired and colluded to fabricate complaints against Plaintiff David and The Entity Plaintiffs. Alki - Please Insert Affidavit Malik Spellman as a dropbox link.

file:///C:/Users/alki.000/Downloads/Affidavit\_Malik%20David%20SpellmanConspiracy.pdf

**Note:** We have affidavits from Zimmerman and Ciara Menieffe.

We are getting statements from some affiants who previously provided affidavits:

- 1) Carl Bowen (Rita recently spoke with Carl and stated that Bloom threatened her to keep her from recanting;
- 2) Ali;
- 3) David Haigh;
- 4) Peter Van Prusisenn;
- 5) Ylena Calendar;
- 6) Ian Robertson;
- 7) Corey Weisman and Weisman Worldwide;
- 8) Isabel Peterman; and
- 9) The affidavits requested of Dana Cole. Please note that Alli's affidavit will establish that she saw other Plaintiffs contrive claims by constantly entering Plaintiff David's office in hopes of enticing him to commit offensive conduct. Please also note that on July 12, Alki David received 42 boxes of evidence and litigation records from Fred Heather's office, consisting of files from David and the Entity Plaintiffs being represented by Barry Rothman (deceased). Barbara and Alki are reviewing those documents and are finding more support for more specific allegations.

t Attorneys, targeted Plaintiff David as a victim to name in spurious settlement demands and in their counsel, Defendant Attorneys, deemed Plaintiff David to be their gravy train and to be a

In 2017, Karl Zirpel, a former employee of Alki David Productions, claimed he was improperly fired after raising safety concerns prior to an event hosted by Entity Plaintiff Hologram at Hologram Theater. Zirpel's sexual harassment claims, like that of many other Plaintiffs whom Defendant Attorneys helped to victimize Plaintiff David, was dropped the claim on the eve of trial. *Karl Zirpel v. Alki David Productions, Inc., et al.*, LASC Case No. BC684618. Note: Alki was not personally named in this suit, but Zirpel's attorneys claimed in The Daily Beast that they would pursue Alki personally once the judgment was finalized.

<https://www.thedailybeast.com/alki-david-coca-cola-heir-who-called-lawyer-a-fuck-tard-loses-dollar1-million-case>.

**Note: Alki, counsel for Zirpel and Zimmerman are not named Attorney Defendants - just ensuring you do not want to add them. Also Note: Alki was previously involved in unrelated litigation over a business dispute with Barry Diller, whose company, IAC owns the Daily Beast.**

In 2017, Hologram USA's independent contractor Grant Zimmerman filed *Grant Zimmerman v. Alkiviades David, et al.*, Case No. BC675552, in the Los Angeles County Superior Court, wrongly alleging wrongful termination and that he was fired by Plaintiff David for revealing David committed sexual misconduct as to

other of David's employees.

**Alki:** Here is a link to a mediation brief filed on Plaintiff David's behalf and on behalf of Hologram Inc., but not the other various entities related to Alki named in Zimmerman's suit. **Note: Alki and his counsel need to determine whether to divulge this as, per evidentiary rules, it is confidential.**

<https://mail.google.com/mail/u/0/#search/Zimmerman/FMfcgxwLtsxhWHtZJFmDWqjCNmJCKqSG?projector=1&messagePartId=0.1> -

On February 2, 2017, Litigating Defendants, Elizabeth Taylor and Chastity Jones filed a Labor-Wrongful Termination lawsuit that also alleged sexual harassment in Los Angeles County Superior Court against Plaintiffs David, Hologram USA Entertainment, Inc., FilmOn Media Holdings, Inc., FilmOn TV., Alki David Productions, Inc. Hologram USA, Inc., Anakando Media Group, USA, FilmOn TV Networks, Inc., and FilmOn TV U.K., Limited.

There is no truth to the allegations asserted by Litigating Defendants Taylor and Jones. Upon information and belief, the suit was filed by legal counsel, Defendants Goldstein, Bloom and Chora to extort settlement proceeds from Plaintiff David and/or the Entity Plaintiffs. Tellingly, Taylor dropped her sexual harassment claim on the day of jury selection, after spending three years maligning and defaming Plaintiff David, with Defendant Attorney promoting Taylor's fallacious sexual harassment claims on TMZ for those three years. CAN WE LINK TO TMZ?


To show good faith, and in an attempt to prove his innocence, Plaintiff David



voluntarily underwent a polygraph test:

6:11

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Posts


September 21, 2019

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 **CONFIDENTIAL**   
**POLYGRAPH RE-EXAMINATION REPORT**

**Examinee Information:**

Examinee Name: **Alkiviades Andrew David**  
Date of Birth: 5/23/1968  
State ID: (CA) F1492405  
Address: 6652 Hollywood Blvd., Los Angeles, CA 90028  
Exam Location: 10100 Santa Monica Blvd. #300, Los Angeles, CA 90067  
Exam Room: Polygraph Room 377  
Exam Date: 08/18/2019  
Report Date: 08/18/2019



**SECTION 1 – Pre-Polygraph Re-Examination Information**





On 08/18/2019, **Mr. Alkiviades Andrew David** (the examinee), returned to the examiner office and voluntarily submitted himself to a polygraph re-examination at the 10100 Santa Monica Blvd. testing site in Los Angeles CA.

The following forms (originals stored in GPS archives) were read, completed, and voluntarily signed by the examinee earlier that day:






GPS FORM	FORM DESCRIPTION	DETAILS
FORM – A	Consent Form, Waiver and Release	Signed by the examinee
FORM – B	Polygraph Examination Rules and Disclosures	Signed by the examinee
FORM – C	Written Report Preference	Signed by the examinee
FORM – D	GPS Examinee Data Sheet	Completed and signed by the examinee

1  
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**POLYGRAPH RE-EXAMINATION REPORT**

QUESTION #	EXAMINEE'S PHYSIOLOGICAL REACTIONS RECORDED ON POLYGRAPH CHARTS	OPINION OF POLYGRAPH EXAMINER
1	No Significant Physiological Reactions or Disturbances	No Deception Indicated (NDI) The Examinee Has Told the Truth
2	No Significant Physiological Reactions or Disturbances	No Deception Indicated (NDI) The Examinee Has Told the Truth

The polygraph charts and physiological reactions were extensively reviewed during the data analysis. It is the examiner opinion (additionally supported by a computer algorithm analysis-OSS-3) that the examinee has **TOLD THE TRUTH** when answered the pertinent questions listed in **Section 2** above.

Based on the test results the examinee, **Mr. Alkiviades Andrew David** did not falsify any detail in his written statement above, made on 8/18/19 at the examiner office, shortly prior to taking the re-examination polygraph test.

Following the review of the polygraph charts and the re-examination test results with the examinee, the examiner confirmed that the examinee had no further questions prior to his departure from the office.

Respectfully Submitted,

Examiner,

Oded Gelfer  
President,  
APA Full Member # 7662  
Global Polygraph & Security LLC  
Tell: 424-302-2498  
[www.90210polygraph.com](http://www.90210polygraph.com)



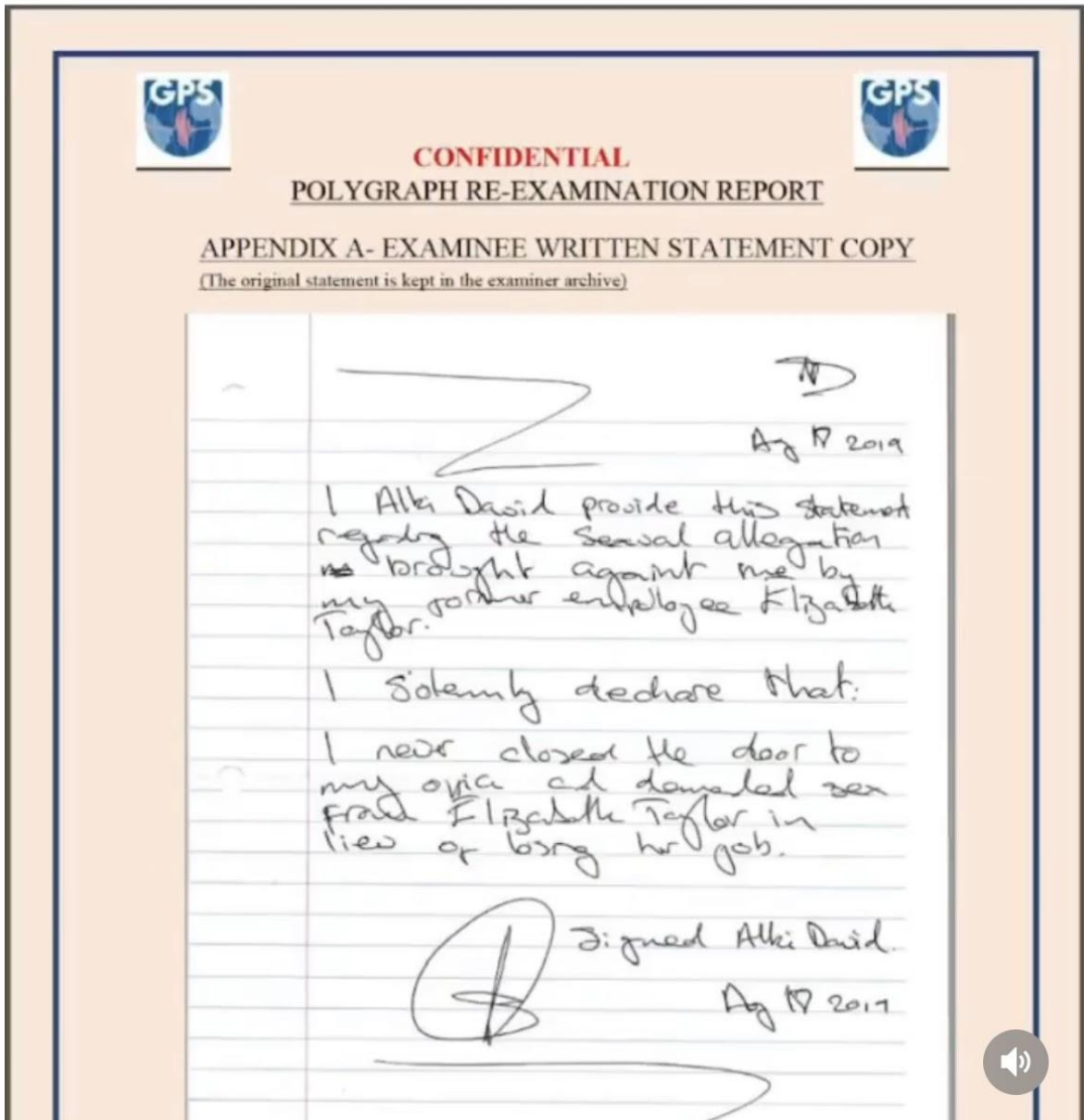
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In 2019, Lauren Reeves, represented by Attorney Defendant Allred, sued Plaintiff David and Plaintiffs Hologram USA and Alki David Productions, LASC Case No. BC649025, for sexual battery and sexual harassment. Attorney Defendants Goldberg and Leal of the Attorney Defendant Allred's firm, represented Reeves, who worked as a comedy writer for Plaintiff Hologram USA. Reeves was awarded \$650,000 in compensatory damages and \$4.35 million in punitive damages.

In November, 2019, Mahim Khan, a former production assistant who

worked at Entity Plaintiff FilmOn TV and Entity Plaintiff Alki David Productions, Inc., sued Plaintiff David and Entity Plaintiffs Alki David Productions, Hologram USA, FilmOn Inc., and Plaintiff David. LASC Case No. BC654017 (2019). Khan obtained an award of \$58 million, \$55 Million of which was for punitive damages for battery, sexual battery and sexual harassment against Plaintiff Alki David.

Plaintiff David and the Entity Plaintiffs are seeking reversal on appeal due to the misconduct of Khan's counsel, Allred, Maroko & Goldberg, including, but not limited to, Defendants Allred, Goldberg, Leal, and Mochkatel, misconduct intended to further the criminal enterprise those counsel participated in in violation of RICO, as more fully alleged herein.

Note: Counsel will need to link to the Petition for Review before the California Supreme Court.

The Los Angeles Superior Court ordered Litigating Defendants Jones and Taylor's lawsuits to be bifurcated and those cases were tried separately. In Litigating Defendant Jones' action, LASC Case No. BC649025 (2017), Jones asserted that she was subjected to sexual harassment and battery and that she was wrongfully terminated because she refused Plaintiff David's advances.

In April, 2019, Litigating Defendant Jones won an award against Plaintiff David for \$11 Million in compensatory damages, an amount that was reduced by \$437,120 by the court because Jones had over-estimated her damages. Counsel

representing Litigating Defendant Jones were Attorney Defendants Bloom, Sarah Bloom of the Bloom Firm, and Attorney Defendants Fundali and Goldstein of the Bloom Law Firm and Attorney Defendant Chora. <sup>6</sup>

In October, 2019, a jury deadlocked 8-4 in Litigating Defendant Taylor's suit, LASC Case No. BC649025 (2017). Los Angeles County Superior Court Judge Christopher Lui declared a mistrial. Counsel for Litigation Defendant Taylor was Attorney Bloom.

**Alki:** Attached is a mediation brief filed on Plaintiff David's behalf and on behalf In 2019, Lauren Reeves, represented by Attorney Defendant Allred, sued Plaintiff David and Plaintiffs Hologram USA and Alki David Productions, LASC Case No. BC649025, for sexual battery and sexual harassment. Attorney Defendants Goldberg and Leal of the Attorney Defendant Allred's firm, represented Reeves, who worked as a comedy writer for Plaintiff Hologram USA. Reeves was awarded \$650,000 in compensatory damages and \$4.35 million in punitive damages.

In Mary Rizzo's deposition conducted by Attorney Defendant Bloom in the *Chastity Jones* case, Rizzo discussed a long chain of text messages between Rizzo and Jones evincing that the Litigating Defendants conspired to contrive claims against Plaintiff David and the Entity Plaintiffs.

Counsel for Plaintiff David in the Jones Trial, Fred Heather of Glaser Weil,

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<sup>6</sup> In Mary Rizzo's deposition conducted by Attorney Defendant Bloom in the *Chastity Jones* case, Rizzo discussed a long chain of text messages between Rizzo and Jones evincing that the Litigating Defendants conspired to contrive claims against Plaintiff David and the Entity Plaintiffs.

**For the Court's convenience, here is a dropbox link to these texts:**

<https://drive.google.com/file/d/14IX-XfL3oOGUS9MV4-zd3GXt0WTE1g3M/view?usp=sharing>.

pointed out to the Court that Ms. Jones blatantly lied, causing a manifest miscarriage of justice in the case that materially and unfairly prejudiced Plaintiff David in the *Jones* case:

GlaserWeil

5. Ms. Jones Was Untruthful and Dishonest in Her Trial Testimony<sup>14</sup>

Mary Rizzo worked for Filmon as an advertising account representative from approximately January 2015 to March 2016. (David Decl., ¶ 2.) In or around June 2016, she filed a lawsuit against Mr. David and other entities and her claims were settled in or around October 2016. (See *id.* at ¶ 3.) Ms. Rizzo and Mr. David had a text-message conversation in or around November 2019 where Ms. Rizzo expressed her belief that “some of the lawsuits that were filed against [Mr. David] and the entity defendants after her settlement were filed at least because of the plaintiffs’ knowledge of the terms of her settlement and not because they had valid claims,” including Ms. Jones’ lawsuit. (*Id.* at ¶ 4.) The following are some examples of Ms. Jones’ trial and deposition testimony that are contradicted by Ms. Rizzo’s text messages to Mr. David and a former Filmon employee’s sworn declaration:

- At trial, Ms. Jones claimed that when she posted a picture of herself in her bathing suit on Instagram on Easter Sunday 2015, Mr. David came up to her the next day and said that he liked the picture she posted and that, “You need to post more pictures like that.” (Reporter’s Transcript, 362:2-19.) Ms. Jones testified that as a result of Mr. David’s comment she “was in shock,” “felt violated by [her] superior,” and “wanted to get away from [Mr. David].” (RT, 362:20-23) Ms. Jones testified that she “went immediately and told Mary Rizzo.” (RT, 362:24-26.) Ms. Rizzo stated that she “was right next to [Ms. Jones] when [Mr. David] commented on [the picture]. She [Ms. Jones] posted it for [Mr. David], she [Ms. Jones] told

<sup>14</sup> The information presented in sections 5 and 6 regarding Ms. Jones’ dishonesty in her trial testimony and Ms. Jones’ attorney bullying a witness punctuate the fact that there has been a miscarriage of justice with respect to Mr. David. Mr. David does not request that the Court award sanctions for this specific conduct. Instead, these are instances that, combined with the clearly egregious perjury of Ms. Jones and the misconduct of her counsel, demonstrate that the Court cannot have faith that the trial of this matter was fair.

18 6. Ms. Jones' Attorneys "Bullied" At Least One Potential Witness to Testify  
19 on Ms. Jones' Behalf

20 Mr. David has obtained a declaration from a percipient witness who did not testify at the  
21 Jones trial, but who states under oath that she believed Ms. Jones' lawyers tried to "bully" her to  
22 provide testimony that was "not true." (See Meniffee Decl., ¶ 16.)

23 In or around May 2019, Ms. Jones' lawyers contacted Ms. Meniffee through her then lawyer,  
24 David Osorio. (Meniffee Decl., ¶ 10.) "With the help of Mr. Osorio, [Ms. Meniffee] prepared a  
25 written statement about [her] knowledge of Ms. Jones and her claims against Mr. David and the  
26 Company," which included the following information: (i) "[o]n several occasions, Ms. Jones—who  
27 had learned about Ms. Rizzo's lawsuit against and settlement with Filmon and Mr. David—asked  
28 [Ms. Meniffee] how much money Ms. Rizzo had received as a result of her settlement. [Ms.

13

DEFENDANT ALKIVIADES DAVID'S MOTION FOR SANCTIONS AGAINST PLAINTIFF CHASITY  
JONES AND HER ATTORNEYS; REQUEST FOR JUDICIAL NOTICE

1986265

**Note: Fred Heather may have a better format to set forth these allegations.**

The Litigating Defendants who are current and former employees of the Entity Plaintiffs, encouraged and aided and abetted by the Defendant Attorneys, targeted Plaintiff David as a victim to name in spurious settlement demands and in lawsuits, as alleged more fully herein. Former employees and their counsel, Defendant Attorneys, deemed Plaintiff David to be their gravy train and to be a deep pocket source of funding.

In October, 2019, Judge Ongkeko of the Los Angeles Superior Court, who oversaw the Elizabeth Taylor case, admonished Defendant Bloom for significantly overstating her already very expensive law firm bills submitted to the Judge when Litigating Defendant Jones won a compensatory award against Plaintiff David.

Tellingly, the Judge said, "If I were a Bloom client - one that was actually

paying out of pocket instead of these sad ambulance chasing contingency cases - I'd be very careful to go over the firm's bills before I paid anything," Judge Ongkeko said.

Such over-billing and seeking to bilk Plaintiff David is just one of innumerable events demonstrating that Defendant Bloom extorted money from Plaintiff David and the Entity Plaintiffs in order to further the criminal enterprise, primarily overseen by Defendants Girardi, Allred, Bloom and Goldberg. Fred, can you help with the transcript of these statements by Judge Ongkeko.

**Note to Counsel: Fred, do you have the Transcript we can cite to with regard to Judge Ongkeko's comments?**

In October, 2019, a jury deadlocked 8-4 in Litigating Defendant Taylor's suit, LASC Case No. BC649025 (2017). Los Angeles County Superior Court Judge Christopher Lui declared a mistrial. Counsel for Litigation Defendant Taylor was Attorney Bloom.

Hologram USA's independent contractor Grant Zimmerman filed *Grant Zimmerman v. Alkiviades David, et al.*, Case No. BC675552, in the Los Angeles County Superior Court, wrongly alleging wrongful termination and that he was fired by Plaintiff David for revealing David committed sexual misconduct as to other of David's employees.

**Alki:** Attached is a mediation brief filed on Plaintiff David's behalf and on behalf of Hologram Inc., but not the other various entities related to Alki named in

Zimmerman's suit. **Note: Alki and his counsel need to determine whether to divulge this as, per evidentiary rules, it is confidential.**

<https://mail.google.com/mail/u/0/#search/Zimmerman/FMfcgxwLtsxhWHtZJFmDWqjCNmJCKqSG?projector=1&messagePartId=0.1> -

In November, 2019, Mahim Khan, a former production assistant who worked at Entity Plaintiff FilmOn TV and Entity Plaintiff Alki David Productions, Inc., sued Plaintiff David and Entity Plaintiffs Alki David Productions, Hologram USA, FilmOn Inc., and Plaintiff David. LASC Case No. BC654017 (2019). Khan obtained an award of \$58 million, \$55 Million of which was for punitive damages for battery, sexual battery and sexual harassment against Plaintiff Alki David.

Plaintiff David and the Entity Plaintiffs are seeking reversal on appeal due to the misconduct of Khan's counsel, Allred, Maroko & Goldberg, including, but not limited to, Defendants Allred, Goldberg, Leal, and Mochkatel, misconduct intended to further the criminal enterprise those counsel participated in in violation of RICO, as more fully alleged herein.

Note: Link to Petition for Review before the California Supreme Court

### **Litigating Defendant Khan Seeks to Obstruct Justice in her Case Against Plaintiff David and the Entity Plaintiffs**

On November 8, 2019, Litigating Defendant Khan was the subject of a police report filed by her roommate, Lauren M. Berkley, who informed officers that *Khan* was threatening Berkley and her daughter because Berkley was going to testify in support of Plaintiff David in the *Mahim Khan* case.

**Woodbridge Police Department**  
4 Meetinghouse Lane, Woodbridge CT 06525  
(203) 367-2511

**CASE/INCIDENT REPORT** SUPPLEMENTARY

CFS NO 190022823	DAY S	INCIDENT DATE 11/01/2019	TIME 14:18	DATE OF RPT 11/01/2019	TIME OF RPT 17:26	TYPE OF INCIDENT THREATENING	INCIDENT CODE 009	INVESTIGATING OFFICER Officer Rodriguez-Perez, Karl A.	BADGE NO 014
DIVISION Patrol	DIVISION NO	REFERENCE DIVISION	REFERENCE DIVISION NO	CASE X-REFERENCE	UNIT ID 114	TYPIST KAR0167	DATE TYPED 11/01/2019	TIME TYPED 17:26	
STREET NO 00016	STREET NAME AND TYPE BURMAN RD Woodbridge	APARTMENT NO/LOCATION	INTERSECTING STREET NAME AND TYPE			STATUS Closed	TOWN CD T167		
OFFENSE Informational	LOCAL X-REF CODE INF	IRI CODE INF	ATT/COMP Completed	OFFENSE DESCRIPTION Cyberspace					
STATUS CODE C=COMPLAINANT V=VICTIM A=ARRESTEE J=JUVENILE H=OTHER M=MISSING W=WITNESS O=OFFENDER D=DRIVER S=SUSPECT P=POLICE OFFICER T=TOT									
STATUS C	NAME Berkley, Lauren M.	SEX F	RACE W	D.O.B. 08/16/1987	TELEPHONE Cel (203) 512-1076	ADDRESS 18 Burma Rd Woodbridge CT	OP STATE & NO. CT 06794935		

On November 1, 2019 I was dispatched to the lobby of this department for a report of threatening. While en route dispatch said the complainant has received threatening text messages.

Upon arrival I met with the complainant, Lauren Berkley (DOB 8/16/87) who said she received threatening text messages on Tuesday October 22, 2019. Berkley goes on to say that she used to be friends with the person who sent the text messages. Her name is Mahim Khan but Berkley said she may have changed her last name to Ashraf.

Berkley provided me with screen shots of the conversation between the two which shows that Mahim started the conversation. It should be noted that the last time either had communication with each other was last year. While Mahim did not specifically threat Berkley she did write, "I hope nothing happens to Grace (Berkley's daughter) but karma is real. And you will get yours. Mark my words." Berkley said that because Mahim specifically mentioned her child, she wanted the incident documented. Prior to Berkley leaving she provided me with Mahim's phone number and was advised to block Mahim on all forms of communication.

I called Mahim, multiple times, but there was no answer. I left a message advising her to have no contact through any forms of

THE UNDERSIGNED, AN INVESTIGATOR HAVING BEEN DULY SWORN, DEPOSES AND SAYS THAT: I AM THE WRITER OF THE ATTACHED POLICE REPORT PERTAINING TO INCIDENT NUMBER 190022823. THAT THE INFORMATION CONTAINED THEREIN WAS SECURED AS A RESULT OF (1) MY PERSONAL OBSERVATION AND KNOWLEDGE OR (2) INFORMATION RELAYED TO ME BY OTHER MEMBERS OF MY POLICE DEPARTMENT OR OF ANOTHER POLICE DEPARTMENT OR (3) INFORMATION SECURED BY MYSELF OR ANOTHER MEMBER OF A POLICE DEPARTMENT FROM THE PERSON OR PERSONS NAMED OR IDENTIFIED THEREIN, AS INDICATED IN THE ATTACHED REPORT. THAT THE REPORT IS AN ACCURATE STATEMENT OF THE INFORMATION SO RECEIVED BY ME.

**DEPT**  
11-8-19

INVESTIGATOR SIGNATURE: /OFFICER Karl A. Rodriguez-Perez/	INVESTIGATOR I.D.#: 014	SIGNED DATE: 11/02/2019	SUPERVISOR SIGNATURE: /SGT. Michael R Blume/	DEPT. SUPERVISOR I.D.#: 002
--	----------------------------	----------------------------	---	--------------------------------

Defendant Attorneys also filed lawsuits on behalf of Litigating Defendants Elizabeth Taylor (represented by Defendant Attorney Goldstein, Bloom, Chora); Chastity Jones (represented by Attorney Defendants Bloom, Sarah Bloom of the Bloom Firm, and Attorney Defendants Fundali, Goldstein of the Bloom Law Firm

and Attorney Defendant Chora), Mahim Khan (represented by Defendant Attorneys Allred, Maroko & Goldberg, Allred, Goldberg, Leal and Mochkatel;) and Lauren Reeves (represented by Defendant Attorney Allred).

Upon information and belief, the Defendant Attorneys committed extortion against Plaintiff David and the Entity Plaintiffs, obstructed justice by manipulating their clients' testimony and committed mail and wire fraud by communicating with their clients and witnesses in such a manner as to defraud Plaintiff David and the Plaintiff Entities. Such actions by the Defendant Attorneys were permitted, over objections by attorneys for the Plaintiff Entities and Plaintiff David. Specifically,

**Judge Liu - Court - Orozco - amplify - This continuous pattern of biased judges continues to this day as repeated efforts to ask the judges to recuse have been summarily denied. ADD Petition for Rehearing filed in the Chastity Jones matter. Dana Cole to help supplement.**

**Alki/counsel - we need to bolster this allegation - perhaps in the 40 boxes?**

**Attorney Defendant Bloom's Egregious Conduct in Her Spurious Lawsuits Against Plaintiff David**

Not satisfied with extorting money from Plaintiff David and the Entity Plaintiffs, Defendant Bloom could not even control herself in the hallway outside of the courtrooms of the Stanley Mosk Courthouse, a public building, where she screamed at Plaintiff David and accused him of multiple rapes.

[Watch Video of Lisa Bloom Defaming Plaintiff David](#)



[PLAY VIDEO](#)



[PLAY VIDEO ALKI DAVID ATTACKS THE CREW!!!! -](#)

[Monica-D'Onofrio Sues](#)

This is the video that Litigating Defendant Elizabeth Taylor used as a basis

for filing a lawsuit against Plaintiff David alleging that he has a history of sexual harrassment. When, in fact, all Litigating Defendants and their counsel knew that the Plaintiff Entities had a unique workplace where the Plaintiff Entities filmed sometimes outrageous conduct as part of their entertainment platform.

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defamatory allegations. <https://www.youtube.com/watch?v=QvCshThAnTQ>

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(The video with Bloom's allegations in the foyer of the Stanley Mosk Courthouse saying that Plaintiff David committed Rapes - plural - The allegations are at 1:45 on this video).

Defendant Bloom's defamations against Plaintiff David were overheard by others, most notably an appalled mother who can be heard on the tape asking for Defendant Bloom to stop her screaming of such allegations because the mother's young daughter was hearing Bloom's defamatory accusations against Plaintiff David, as were attorneys waiting for court hearings). While Defendant Bloom has

manifested unethical behavior in many instances as against Plaintiff David and the Plaintiff Entities, perhaps this is the most paradigm illustration that her behavior in litigation is not merely grossly unethical, but is also unstable and bordering on the pathological.

### **ADD BLOOM IN THE UK AND DAVID HAIGH & Latifa**

### **DEFENDANTS ALLRED AND BLOOM EXCEEDED THE BOUNDARIES OF ADVOCACY AND DEFAMED PLAINTIFF DAVID**

Throughout the entire, years-long campaign to obliterate Plaintiff David's reputation and bankrupt him and the Plaintiff Entities, Defendant Allred exceeded all respectable boundaries of advocacy and she exceeded the boundaries of the United States as well, maligning Defendant Alki's character and reputation in Switzerland.

In Switzerland, Defendant Allred wrongfully sought to enforce a non-final judgment against Plaintiff David *and his family*, none of whom were parties to any

relevant litigation filed by Defendant Attorneys, in *Mahim Kahn v. Alki David, et al*, in violation of Swiss law.

Béatrice Stahel, of MC Avocats SA (Ltd.) in Gstaad, Switzerland, provides Plaintiff David with Swiss representation. Plaintiff David has filed criminal complaints in Switzerland against Reeves, alleging Reeves is guilty of wilful defamation (art. 174 SCC) / defamation (art. 173 SCC). Reeves is represented by

Attorney Defendant Allred. Stahel informs in an English translated letter that Allred has violated Swiss law.<sup>4</sup>

In Switzerland, Defendant Allred also wrongfully sought to enforce a non-final judgment against Plaintiff David *and his family*, none of whom were parties to any relevant litigation filed by Defendant Attorneys, in *Mahim Khan v. Alki David, et. al*, in violation of Swiss law.<sup>5</sup>

The Swiss courts rejected Allred's extraterritorial efforts to collect on the *Mahim Khan* judgment because appellate proceedings are ongoing in that case. Indeed, Defendant David and the named Entity Defendants in the *Mahim Khan* case have a Petition for Review pending before the California Supreme Court.

At the time that Attorney Defendant Allred violated Swiss law and national

<sup>4</sup><https://mail.google.com/mail/u/0/#search/Swiss+translation+/KtbxLzfhXkdXKQwHMJbkPTWfLhtpgXQSgV?projector=1&messagePartId=0.1>. (Letter from Plaintiff David's Swiss Counsel, December 16, 2021).

<sup>5</sup>[https://docs.google.com/document/d/1Sqn9smWheF\\_6yI\\_bNY1EPne1yxweAiO3zNX6\\_g4PiJg/edit](https://docs.google.com/document/d/1Sqn9smWheF_6yI_bNY1EPne1yxweAiO3zNX6_g4PiJg/edit) (Letter from Plaintiff David's Swiss Counsel, December 16, 2021).

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policy, Defendant David's and the named Entity Defendants' appeal was pending before the California Court of Appeal of the State of California District Division Two, *Mahim Khan v. Alkiviades David*, B305849, B3088727.

Defendant Allred's illegal actions in Switzerland have caused, and continue to cause, Plaintiff David extreme expense and have, and continue to cause, further

damage to Plaintiff David's reputation as such filings are public record in Switzerland. Plaintiff David has gone to great expense to hire legal counsel to fight the criminal enterprise conducted by Defendant Allred and Defendant Bloom's continuous, wrongful spurious actions and defamatory actions.

Defendant Allred's corrupt, wilful and intentional actions, constituting criminal acts under relevant Swiss law, were committed under the auspices of an otherwise legitimate enterprise, Allred, Maroko & Goldberg.<sup>6</sup>

However, Defendant Allred's reprehensible conduct alleged above is not the end of the story recounting her actionable wrongful actions.

On the day after the *Mahim Khan* verdict issued, Allred and Litigating Defendant Khan, went beyond the pale by calling a press conference in front of the Beverly Hills Police Station as they sought unsuccessfully to file criminal charges against Plaintiff David with regard to Khan's claims against David.

<sup>6</sup><https://www.globenewswire.com/en/news-release/2019/11/01/1939286/0/en/Billionaire-Hires-Three-Major-UK-Law-Firms-to-Fight-Lisa-Bloom-and-Gloria-Allred.html>.

<https://www.youtube.com/watch?v=ROxzyBADKvQ>.

However, the Police turned Defendants Allred and Khan away, stating that they did not have the evidence necessary to file such charges. **No such charges were ever filed.** Defendant Allred called a news conference at the Beverly Hills

police station on the date she attempted to file criminal charges against Plaintiff David with the express purpose of intimidating, harassing and defaming Plaintiff David. Defendant Allred's actions in calling the press conference **and what other of her actions** have caused serious and lasting emotional harm to Defendant David. After having been told by the police that she did not have the requisite proof to support a criminal filing against Plaintiff David, upon information and belief, Defendant Allred arranged to have a false article published in the LA Times. [Self-appointed ambassador for 'wronged men' of #MeToo Alki David faces criminal complaint - Los Angeles Times \(latimes.com\).](#)

Notably, Plaintiff David has thrice asked the LA Times to retract the article, only to be ignored completely. **Alki can we include a link where you asked the LA Times to retract the article.**

Therefore, Defendant Allred's defamatory comments against Plaintiff David continue on for anyone to see. Upon information and belief, Defendant Allred, an officer of the Court had a duty to retract her defamatory remarks against Plaintiff David. To this day - crickets. This is one in a voluminous number of Allred's

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nefarious, harassing and extorting actions against Plaintiff David. **With David Haigh advising us how to best present the wrongdoings by Lisa Bloom and Gloria Allred and Latifa -**

**The Racketeering Enterprise Defendants' Conspiracy to Extort** The Attorney Defendants' Allred, Bloom, Goldberg and Girardi conspired to extort money from Plaintiff David and the Attorney Defendants, and the Attorney Defendants tampering with witnesses constitute wrongful actions under the auspices of otherwise legitimate enterprises, including, but not limited to, Allred, Maroko & Goldberg, The Bloom Firm; Girardi Keese; Dordick Law Corporation; Chora, Young & Manasserian and The Law Offices of Ebby S. Bakhtiar. Accordingly, as more fully set forth in this Complaint, Plaintiff David and the Entity Defendants sue all Attorney Defendants for injuries to Plaintiff David's and the Entity Plaintiffs' businesses and properties directly and proximately caused by the Attorney Defendants' mail fraud, bribery, extortion, all of which predicate claims pursuant to RICO.

Further, the Defendant Attorneys conspired to tamper with witnesses and to have witnesses and the Litigating Defendants collude against Plaintiff David and the Entity Plaintiffs by contriving allegations to support their actions against Plaintiffs David and the Plaintiff Attorneys. Such tampering with witnesses constitute wrongful actions under the auspices of otherwise legitimate enterprises, including, but not limited to, Allred, Maroko & Goldberg, The Bloom Firm; Girardi Keese; Dordick Law Corporation; Chora, Young & Manasserian and The Law Offices of Ebby S. Bakhtiar.

The Attorney Defendants played fast and loose with both the Litigating Defendants and witnesses as well as the evidence they introduced in each case. Defendant Allred kept Defendant Mahim Kahn and Defendant Lauren Reeves as clients, but sent Defendant Elizabeth Taylor to Defendant Bloom, Allred's daughter.

Subsequently, Defendant Bloom was retained by Defendant Chastity Jones, all with an effort to extort money from Plaintiff David and the Plaintiff Entities. Upon information and belief, Defendants Mahim Khan, Elizabeth Taylor, Lauren Reeves, and Chastity Jones (Litigating Defendants), with the encouragement of the Defendant Attorneys, conspired and colluded to make up stories about the actions of Plaintiff David and Plaintiff Entities in order to file their spurious lawsuits against Plaintiff David and Plaintiff Entities. **Insert text messages from Chastity etc.**

The Attorney Defendants' conspiring to extort and extorting money from Plaintiff David and the Attorney Defendants, and the Attorney Defendants tampering with witnesses, committed actions under the auspices of otherwise legitimate enterprises, including, but not limited to, Allred, Maroko & Goldberg, The Bloom Firm; Girardi Keese; Dordick Law Corporation; Chora, Young & Manasserian and The Law Offices of Ebby S. Bakhtiar.

**Insert more specific instances if available.**

Accordingly, Plaintiff David and the Entity Defendants sue all Attorney

Defendants for injuries to Plaintiff David's and the Entity Plaintiffs' businesses and properties directly and proximately caused by the Attorney Defendants' mail fraud, bribery, and extortion, all of which predicate claims pursuant to RICO.

Plaintiffs assert, pursuant to 18 U.S.C. §§1962(b)(c) and (d), that the Attorney Defendants, their clients, experts, employees and agents, conspired with one another and intended to, and did, wilfully conduct an inter-related, clear and continuous pattern of racketeering activity to benefit Defendant Attorneys' unlawful enterprise, and that Defendants continue to do so, by, inter alia, wilfully and intentionally conspiring against Plaintiff David and the Entity Plaintiffs by filing spurious lawsuits against Plaintiff David and the Entity Plaintiffs, who were, and continue to be, victimized by Attorney Defendants' continuous pattern of racketeering conducted to benefit their enterprises, including mail fraud, extortion, bribery, and aiding and abetting, all of which are cognizable as RICO predicate acts pursuant to 18 U.S.C. §§ 1861 and 1862 (b)(c) and (d).

### **Defendants Allred, Bloom and Swiss Counsel Illegally Further the Enterprise**

Defendant Allred continues to further the criminal enterprise by utilizing illegal tactics to obstruct justice, both in the U.S. and in Switzerland, as she seeks to collect on a judgment in the *Mahim Khan* case despite that case being on appeal before the Supreme Court of California. Defendant Allred has violated relevant Swiss law in seeking to collect punitive damages in both the *Khan* and *Reeves*

cases as such damages are prohibited in Switzerland. Punitive damages are not available under Swiss law. Swiss courts refuse to award punitive damages even if the applicable foreign law provides for such damages (Article 135(2) Swiss Private International Law).

Litigating Defendant Khan participated in the Swiss Attorney Defendants' illegal efforts to enforce immature judgments against Plaintiff David, knowing that her case was on appeal in the United States, and thus was not collectible in Switzerland. Further, Defendant Khan wrongfully and illegally defamed Plaintiff David in Switzerland, alleging David had been "convicted" of sexual harassment, all the while knowing through her Swiss counsel that her wrongly accusing him of being "convicted" constituted wilful defamation (art. 174 SCC) in Switzerland.

Litigating Defendant Lauren Reeves participated in the Swiss Attorney Defendants' illegal efforts to enforce a judgment against Plaintiff David for punitive damages which are not collectible in Switzerland. Defendant Reeves participated in the Swiss Attorney Defendants' illegal efforts to enforce a punitive damages award, knowing through her Swiss Attorneys that punitive damages are not collectible in Switzerland, as more fully detailed below.

Further, Defendant Khan wrongfully and illegally defamed Plaintiff David in Switzerland, alleging he had been "convicted" of sexual harassment, all the while knowing through her Swiss counsel that that her wrongly accusing him of

being “convicted” constituted wilful defamation (art. 174 SCC) in Switzerland.

Specifically, in an opinion letter, Plaintiff David’s and The Entity Plaintiffs’ Swiss counsel, Arthur Seppey, Avocat au barreau, wrote to Swiss prosecutors, stating:

“Dear Colleague, We hereby refer to our client’s latest emails and to your request to receive an update concerning the Swiss current proceedings. As a result, you will find here a summary of the current Swiss criminal proceedings regarding our client. In the frame of his activities led through his companies based in the US, FilmOn. TV, Inc. (FilmOn hereinafter), Alki David Productions, Inc. (Delaware) (ADP hereinafter) and Hologram USA, Inc. (Delaware) (Hologram hereinafter), Mr. DAVID formerly employed Mrs. Lauren REEVES and Mrs. Mahim KHAN.

**I.** Lauren REEVES (a comedy writer, former model and comedy performer born on September 4th 1983) was employed as a writer for FilmOn (2015), as an employee charged to attract and write for comedians for Hologram (2016) and as a creative producer/host for ADP (2016). Lauren REEVES filed an application in California against our client for battery, sexual battery and sexual harassment asking for damages and punitive damages. On the basis of a popular jury’s decision (cf. *Bordereau plainte pénale 21-11-18, exhibit n° 9*), 58 our client and two of his companies (Hologram and ADP) have been sentenced to pay her :

- \$ 650'000 (compensatory damages)
- \$ 1'299'675 (attorneys’ fees)
- \$ 65'346.02 (proceedings costs) Our client has additionally been personally sentenced to pay to Lauren REEVES \$ 4'350'000 as punitive damages. Lauren REEVES, even though she never tried to enforce the above-mentioned judgment in the United States (US hereinafter), filed on October 14<sup>th</sup> 2021 a freezing in Switzerland against our client’s Swiss goods, including his real estate property in Gstaad, to enforce the above-mentioned judgment (cf. *Bordereau plainte pénale 21-11-18, exhibit n° 8*). By filing her freezing order, Lauren REEVES said that our client has been convicted in the US for sexual harassment. Lauren REEVES managed to freeze our client’s Swiss goods to enforce the judgment’s amounts except the \$ 4'350'000 of punitive damages. This Swiss judgment is now under appeal.

**II.** As did Lauren REEVES, Mahim KHAN, represented in the US by the same lawfirm (ALLRED MAROKO & GOLDBERG), filed an application in California against our client for battery, sexual battery and sexual harassment. On the basis of a popular jury’s decision (cf. *Bordereau plainte pénale 21-11-29, exhibit n° 6*), our client and two of his companies (FilmOn and ADP) have been sentenced to pay her :

- \$ 8'250'000 (damages)
- \$ 1'398'885 (attorneys’ fees)

- \$ 74'165.60 (proceedings costs)

Our client has additionally been personally sentenced to pay to Mahim KHAN \$ 50'000'000 as punitive damages.

Mahim KHAN, represented in Switzerland by the same law firm (CHABRIER AVOCATS) than Lauren REEVES filed on the same day than Lauren REEVES, which means on October 14<sup>th</sup> 2021, a freezing order against our client's Swiss goods, including his real estate property in Gstaad, to enforce the above mentioned judgment, even though she never tried to enforce it in the US beforehand (cf. Bordereau plainte pénale 21-11-29, exhibit n° 10). However, unlike Lauren REEVES, Mahim KHAN totally lost her Swiss judgment because the US judgment on which she based herself was not enforceable as an appeal has been introduced in the US by our client, which means that the judgment isn't final (when someone try to obtain a freezing order in Switzerland on the basis of a judgment, that judgment has to be final).

As a reaction to those freezing order applications against him in Switzerland our client filed a criminal complaint against Lauren REEVES on November 19<sup>th</sup> 2021 and against Mahim KHAN on November 30<sup>th</sup> 2021 in front of the Public prosecutor's office in Geneva. Both complaints, based on similar facts, denounce 4 Swiss criminal offences ([https://www.fedlex.admin.ch/eli/cc/54/757\\_781\\_799/en](https://www.fedlex.admin.ch/eli/cc/54/757_781_799/en)) :

#### 1. Defamation (art. 173 of the Swiss criminal code, SCC hereinafter)

##### Art. 173

*« 1. Any person who in addressing a third party, makes an accusation against or casts suspicion on another of dishonourable conduct or of other conduct that shall be liable to damage another's reputation, any person who disseminates such accusations or suspicions, shall be liable on complaint to a monetary penalty. 2. If the accused proves that the statement made or disseminated by him corresponds to the truth or that he had substantial grounds to hold an honest belief that it was true, he is not liable to a penalty. 3. The accused is not permitted to lead evidence in support of and is criminally liable for statements that are made or disseminated with the primary intention of accusing someone of disreputable conduct without there being any public interest or any other justified cause, and particularly where such statements refer to a person's private or family life.*

*4. If the offender recants his statement, the court may impose a more lenient penalty or no penalty*

*at all.*

*5. If the accused is unable to prove the truth of his statement, or if it is shown to be untrue, or if the*

*accused recants his statement, the court must state this in its judgment or in another document. »*

Both Lauren REEVES and Mahim KHAN said that our client has been convicted for sexual harassment by the Superior Court of the State of California. First of all it's wrong because it doesn't exist a Superior Court of the State of California but many (the Los Angeles one in our client's case). Then, it's not a judge but a popular jury who has sentenced and not convicted our client. Furthermore our client has not been "convicted" for sexual harassment (civil cases) but sentenced to pay them indemnities which is completely different.

As a matter of fact our client has never been criminally convicted for any offence, sexual harassment included. As a result and according to our client, saying that both Lauren REEVES and Mahim KHAN committed a defamation towards him, dirtying his honour.

## 2. Wilful defamation (art. 174 SCC)

### Art. 174

« 1. A person in addressing a third party, and knowing his allegations to be untrue, makes an accusation against or casts suspicion on another of dishonourable conduct, or of other conduct that shall be liable to damage another's reputation, any person who disseminates such accusations or suspicions, knowing them to be untrue,

shall be liable on complaint to a custodial sentence not exceeding three years or to a monetary penalty.

2. If the offender has acted systematically to undermine the good reputation of another, he shall be liable to a custodial sentence not exceeding three years or to a monetary penalty of not less than 30 daily penalty units.<sup>197</sup>

3. If the offender recants his statement before the court on the grounds that it is untrue, the court may impose a more lenient penalty. The court must provide the person harmed with a document confirming the recantation. »

Here the same explanation than the one used above for Defamation (art. 173 SCC) is taken up. The only difference is that this criminal offence is more serious because the perpetrator knows the innocence of the victim. Both Lauren REEVES and Mahim KHAN knew our client was innocent because they took part in the US proceedings, they also were represented by Swiss and US attorneys and finally they couldn't have ignored that the cases were civil ones and not criminal ones. As a result and according to our client, both Lauren REEVES and Mahim KHAN committed a wilful defamation towards him, dirtying his honour.

## 3. Attempted fraud (art. 146 SCC)

### Art. 146

<sup>1</sup> Any person who with a view to securing an unlawful gain for himself or another wilfully induces an erroneous belief in another person by false pretences or concealment of the truth, or wilfully reinforces an erroneous belief, and thus causes that person to act to the prejudice of his or another's financial interests, shall be liable to a custodial sentence not exceeding five years or to a monetary penalty.

<sup>2</sup> If the offender acts for commercial gain, he shall be liable to a custodial sentence not exceeding ten years or to a monetary penalty of not less than 90 daily penalty units.

<sup>3</sup> Fraud to the detriment of a relative or family member is prosecuted only on complaint. »  
First of all both Mahim KHAN and Lauren REEVES tried to enforce in Switzerland millions of punitive damages meanwhile punitive damages are not only illegal in Switzerland : they are contrary to Swiss public order, in other words contrary to Swiss legal quintessence. By doing so they tried to trick the judge and the trial.

Secondly, both of these women tried to convince the judge that our client has been convicted for sexual harassment.

In other words they tried to lead the judge to make himself a misrepresentation of the US legal situation in order to obtain what they wanted.

As a result and according to our client, both Lauren REEVES and Mahim KHAN committed an attempted fraud (attempted fraud to the trial, which is a particular case of fraud) towards him.

## 4. Attempted coercion (art. 181 SCC)

### Art. 181

« Any person who, by the use of force or the threat of serious detriment or other restriction of another's freedom to act compels another to carry out an act, to fail to carry out an act or to tolerate an act, shall be liable to a custodial sentence not exceeding three years or to a monetary penalty. »

First of all both Lauren REEVES and Mahim KHAN tried to enforce in Switzerland huge amounts of money (millions of punitive damages) that are in Switzerland highly illegal, what they knew because they were both represented by Swiss attorneys.

Secondly and in view of the above, they filed their freezing order in Switzerland knowing that there were no connection to Switzerland. As a matter of fact all the elements of the case concern directly the US.

Thirdly, both of these women acted in Switzerland without having at least tried to enforce the concerned judgments in the US neither against our client nor against the two of his companies. Regarding Mahim KHAN her freezing order application presents one more shocking aspect next to all the above-mentioned ones : she tried to enforce in Switzerland an US judgment which is not even final. As a result and according to our client, both Lauren REEVES and Mahim KHAN committed an attempted coercion towards him. The two above mentioned criminal complaints are dealt by a public Prosecutor in Geneva : Adrian HOLLOWAY, who has a leading function in the public Prosecutor's office. Furthermore he's member of the political party called UDC, which is a strong right-wing political party.

- The one against Lauren REEVES is registered under reference : P./22539/2021.
- The one against Mahim KHAN is registered under reference : 23339/2021.

Our client currently doesn't have any concrete result about his criminal complaints filed in Switzerland, the proceedings having just begun (November 2021). . . .

Yours sincerely,  
**ARTHUR SEPPEY**  
Avocat au barreau

## **Defendant Attorney Allred's Illegal Actions Furthering the Criminal Enterprise**

Upon information and belief, Plaintiff David and the Entity Plaintiffs assert that Defendant Allred, conspired with the other United States-Based Attorney Defendants, including Goldberg, Leal, Mochkatel, Bloom, Fudali, Dordick, Griffith, Goldstein, Chora, and Bakhtiar, to carry on with their criminal enterprise aimed at harming Plaintiff David and The Entity Plaintiffs.

The United States-Based Attorney Defendants did, and continue to, coach

Litigating Defendants to lie and to mischaracterize their interactions with Plaintiff David and to file spurious lawsuits against Plaintiff David and the Entity Plaintiffs in order to deprive Plaintiff David and the Entity Plaintiffs of their property.

**Note:** Do we have any examples other than this one: Carl Bowen Affidavit stating that Rita told him that Defendant Allred coached her about what to say in the court proceedings. Rita also stated that Allred told her to lie about the allegations against Plaintiff David. Carl said that Rita stated that Allred told her she cannot recant and that Rita also stated to Carl that Allred has threatened that if she does recant, she will have to pay all of Allred's attorneys' fees and court costs, which significantly intimidated her. Rita also stated that Allred told her to lie about the allegations against Plaintiff David.

**Insert texts and coaching**  
**Mahim Khan Trial: Illegal and Unethical Acts of Attorney Defendants Allred, Goldberg, Leal and Mochkatel and Defendant The California Bar's Failure to Respond, Let Alone to Intervene, in the Interests of Justice**

Plaintiff David's legal counsel Attorney Murray Greenberg wrote a letter to the State Bar of California Office of Chief Trial Counsel Intake Department setting forth the manifest abuse of process in the *Mahim Khan* case by Attorney Defendants Allred, Goldberg, Leal and Ms. Mochkatel.

In relevant part, Greenberg's letter, dated April 29, 2020, stated:

I, Murray B. Greenberg, Esq. submit this complaint on behalf of Alkiviades ("Alki") David against attorneys Gloria Allred, Nathan Goldberg, Dolores Y. Leal and Renee Mochkatel based on their professional misconduct in the case held before Judge Michelle Williams Court in Los Angeles Superior Court, Central District Case No. BC654017 entitled MAHIM KHAN, Plaintiff v. HOLOGRAM USA, Inc.; ALKI DAVID PRODUCTIONS, INC.; FILMON TV, INC.; ALKIVIADES

(“ALKI”) DAVID, an individual; and DOES 1 through 25, Defendants.

“This was a highly contentious lawsuit which involved allegations of battery and harassment against the defendant, Mr. David and associated companies. The above-named attorneys used dishonest means and violated their ethical responsibilities during the trial which hampered Mr. David’s ability to properly mount a defense.

The most egregious ethical breach involved the manipulation of a joint exhibit list by plaintiff’s attorneys which caused a doctored list to be filed with the court. As if this action was not serious enough, the plaintiff’s attorneys also removed the signature page with defendant’s attorney’s (renowned litigator and trial attorney, Ellyn S. Garofalo) signature **ADD AS A FOOTNOTE ELLYN’S FILING ON THIS ISSUE** affixed to it from a previous agreed upon version (See Attachment 3 EXHIBIT A – page 31). They then attached it to the fraudulent version (Attachment 3 EXHIBIT B – page 31) when she was unavailable. Mr. Goldberg then signed the exhibit list and filed it with the court.

This was done without the knowledge, permission or authorization of Ms. Garofalo or anyone else in her office. (Attachment 3 Declaration of Ellyn S. Garofalo page 2, paragraphs 6-9).

A comparison between the doctored document and the original agreed upon version indicates that one document was added (EXHIBIT B, page 5 - Ex. #131 – “Dr. Reading Documents”) and three documents were deleted (EXHIBIT B, page 30 – Exs. #647, 648 and 649).

Ms. Leal and Ms. Mochkatel were two other attorneys listed on the pleading as well as Gloria Allred who is a partner of the law firm. In addition to the above referenced misconduct, the attorneys for plaintiff sought to exclude documents that were previously produced to plaintiff’s attorneys by indicating falsely to the court that they were not disclosed or produced in discovery. Based upon the fact that the documents were Bates stamped, these items were in fact provided to plaintiff’s attorneys during discovery (Attachment 3 Declaration of Ellyn S. Garofalo page 1, paragraphs 2 -3).

During the closing argument, Mr. Goldberg indicated on several

occasions that Mr. David did not call witnesses on his behalf. He also suggested that if he were not culpable, witnesses would have testified for him. (See Attachment 10 – page 83, lines 27-28, page 84, lines 1-4; page 146, lines 20-27; page 147, lines 1-4 and page 148, lines 17-25). This was done even though the judge had previously ruled outside the jury’s presence that Mr. David would not be able to call any witnesses (including himself) on his behalf.(See Attachments 3 through 9 – Motions in Limine by plaintiff, response by defendants and court rulings) This created a false and unfair impression to the jury.

By filing a doctored document purporting to be a joint exhibit list, making a false statement to the court regarding the status of discovery in order to gain an unfair advantage in litigation and creating a false impression to the jury, attorneys Gloria Allred, Nathan Goldberg, Dolores Y. Leal and Renee Mochkatel breached their ethical responsibility under Rule of Professional Conduct, rule 3.3 Candor

Toward the Tribunal; rule 3.4 Fairness to Opposing Party and Counsel; rule 5. Responsibilities of Managerial and Supervisory Lawyers; rule 8.4 Misconduct; and Business and Professions Code section 6106 Moral Turpitude.

**Insert a link to the entire complaint to the State Bar of California.**

The Defendant Attorneys’ illegal enterprise activity will extend beyond the initial period of time when the predicate acts commenced because litigation continues in the suit filed by Elizabeth Taylor and the *Mahim Khan* case is on appeal. Defendant Allred continues to further the criminal enterprise by utilizing illegal tactics to obstruct justice, both in the U.S. and in Switzerland, as she seeks to collect on a judgment in the *Mahim Khan* case despite that case being on appeal before the Supreme Court of California.

**Defendants Allred’s, Bloom’s and The Collection Defendant Attorneys’ Illegal Actions in Switzerland to Further Their Criminal Enterprise**

Defendants Allred, Bloom, Marc Gillieron and Emilie Theintz and Chabrier Avocats, SA (“The Collection Defendant Attorneys”) and Litigating Defendants Reeves and Khan violated United States Law and Swiss Law by seeking to illegally collect money and property from Plaintiff David, *and members of his family having nothing to do with any of the lawsuits addressed in this Complaint.*

Specifically, the Collection Defendant Attorneys obstructed justice and committed extortion by attempting to collect money and property from Plaintiff David, including \$55 Million in punitive damages based solely on the trial court order in *Mahim Khan*, knowing that making such collection efforts was unlawful: 1) because **an appeal was ongoing - and still is**; and 2) Punitive damages are not available under Swiss law. Swiss courts refuse to award punitive damages even if the applicable foreign law provides for such damages (Article 135(2) Swiss Private International Law).

The Collection Defendant Attorneys knowingly and wilfully participated in a racketeering enterprise aimed at extorting money from Plaintiff Alki and the Entity Plaintiffs. Defendants Oren Warshavsky, Baker Hostetler, Marc Gillieron, as a partner in Chabrier Avocats, SA, Emilie Theintz, an associate in Chabrier Avocats, SA, a law firm based in Geneva Switzerland.

### **Defendants Allred, Bloom and Swiss Counsel Illegally Further the Enterprise**

Defendants Allred and Bloom continue to further the criminal enterprise by

utilizing illegal tactics to obstruct justice, both in the U.S. and in Switzerland, as she seeks to collect on a judgment in the *Khan* case despite that case being on appeal before the Supreme Court of California. Defendant Allred has violated relevant Swiss law in seeking to collect punitive damages as such damages are prohibited in Switzerland. Punitive damages are not available under Swiss law. Swiss courts refuse to award punitive damages even if the applicable foreign law provides for such damages (Article 135(2) Swiss Private International Law).

Upon Information and Belief, Defendants Allred, Bloom, Gillieron and Theintz and Chabrier Avocats, SA (“The Collection Defendant Attorneys”) violated United States Law and Swiss Law by seeking to collect money and property from Plaintiff David, *and members of his family having nothing to do with any of the lawsuits addressed in this Complaint*. Specifically, the Collection Defendant Attorneys obstructed justice and committed extortion to further their racketeering enterprise by attempting to collect money and property from Plaintiff David, including \$55 Million in punitive damages based solely on the trial court order in *Mahim Khan*, knowing that making such collection efforts was unlawful: 1) because an appeal was ongoing - and still is; and 2) Punitive damages are not available under Swiss law. Swiss courts refuse to award punitive damages even if the applicable foreign law provides for such damages (Article 135(2) Swiss Private International Law).

Upon information and belief, the Defendant Collection Attorneys wilfully and intentionally defamed Plaintiff David, in violation of Swiss law, to further their wrongful enterprise to obstruct justice, use mail and wife fraud to harm Plaintiff David and the Entity Plaintiffs, and to commit bribery and extortion, as more fully set forth herein.

### **Attorney Defendant Chora's Obstruction of Justice and Interference with Contract Relations**

Upon information and belief, Defendant Attorney Chora placed a judgment lien on the PayPal account owned by Plaintiff Entity Hologram U.S.A., seeking to garner funds from that account as he seeks to collect on the Judgment awarded to Litigating Defendant Chastity Jones. In *Jones*, the jury returned a special verdict, awarding her \$591,300 in economic damages, \$1,500,000 in past noneconomic damages, and \$1,000,000 in future noneconomic damages. After a second phase of trial, the jury awarded Jones \$8 Million in punitive damages **against Plaintiff David only - not against any of the Entity Plaintiffs.**

Upon information and belief, Defendant Chora followed inappropriate and unlawful collection procedures, both in the United States and United Kingdom by seeking to enforce judgments obtained by the United States-Based Attorney Defendants on behalf of the Litigating Defendants as against the Plaintiff Entities' PayPal accounts in the United States and in the United Kingdom.

## **Dordick and Bakhtiar - Jane Doe Matter - add**

Upon Information and Belief, Defendants Allred, Marc Gillieron and Emilie Theintz and Chabrier Avocats, SA (“The Collection Defendant Attorneys”) violated United States Law and Swiss Law by seeking to collect money and property from Plaintiff David, *and members of his family having nothing to do with any of the lawsuits addressed in this Complaint.* Specifically, the Collection Defendant Attorneys obstructed justice and committed extortion by attempting to collect money and property from Plaintiff David, including \$55 Million in punitive damages based solely on the trial court order in *Mahim Khan*, knowing that making such collection efforts were unlawful: 1) because an appeal was ongoing - and still is; and 2) Punitive damages are not available under Swiss law. Swiss courts refuse to award punitive damages even if the applicable foreign law provides for such damages (Article 135(2) Swiss Private International Law).

**Swiss Criminal Proceedings Demonstrate that Litigating Defendants Chasity Jones and Mahim Khan have Defamed Plaintiff Alki as Have The Defendant Swiss Attorneys**



**Beilage 1:** Amended Judgment vom 10. September 2020

2. Das Dispositiv des Urteils lautet wie folgt:

« **NOW THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED** that Plaintiff Lauren Reeves shall have and recover damages as follows:

As against Defendants Hologram USA, Inc., Alki David Productions, Inc., and Alkiviades David, jointly and severally, for compensatory damages the sum of: **\$650,000** with interest thereon at the rate of ten (10%) percent per annum from the date of the entry of the Judgment, January 7, 2020 until paid.

As against Defendant Alkiviades David individually for punitive damages the sum of: **\$4,350,000** with interest thereon at the rate of ten (10%) percent per annum from the date of the entry of the Judgment, January 7, 2020 until paid.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that

Pursuant to the Court's Order of July 22, 2020, Plaintiff Reeves shall have and recover from said Defendants jointly and severally:

Attorneys' fees in the amount of **\$1,299,675.00**, and costs in the amount of **\$65,346.02**, plus interest thereon at the rate of ten percent (10%) per annum from the date of entry of this Amended Judgment until paid. »

In freier Übersetzung:

«**DARUM WIRD ANGEORDNET, ERKANNT UND BESCHLOSSEN**, dass der Klägerin Lauren Reeves folgender Schadenersatz zusteht:

Gegen die Beklagten Hologram USA, Inc., Alki David Productions, Inc., and Alkiviades David, gesamtschuldnerisch, als Schadenersatz die Summe von: **\$650'000** zuzüglich Zinsen in Höhe von zehn (10%) Prozent pro Jahr ab dem Datum des Urteilstretts am 7. Januar 2020 bis zur Zahlung.

Gegen den Beklagten Alkiviades David einzeln als Strafzuschlag zum Schadenersatz die Summe von: **\$4'350'000** zuzüglich Zinsen in Höhe von zehn (10 %) Prozent pro Jahr ab dem Datum der Urteilsverkündung am 7. Januar 2020 bis zur Zahlung.

**ES WIRD FERNER ANGEORDNET, ERKANNT UND BESCHLOSSEN**, dass

Gemäß der gerichtlichen Verfügung vom 22. Juli 2020 hat die Klägerin Reeves von den Beklagten gesamtschuldnerisch folgende Ansprüche

Anwaltshonorare in Höhe von **\$1'299'675.00** und Kosten in Höhe von **\$65'346.02**, zuzüglich Zinsen in Höhe von zehn Prozent (10%) pro Jahr ab dem Datum des Urteilstretts

**MOVE - Ellyn's Theory:** We have now filed your new trial motion in the Chasity Jones case. The motion will be heard by the original judge, Judge Ongeko, on August 16, 2019. New trial motions are rarely granted. However, we have a good argument that there was no admissible evidence of your net worth and thus the punitive damages award must be stricken, or substantially reduced. Interestingly, the Bloom Firm (in another example of their incompetence) filed a motion in the Taylor case which supports our argument in the Jones new trial motion that there was no admissible evidence of punitive damages, and thus the award *must* be set aside or it is “automatically reversible” on appeal. This argument, made to obtain financial discovery in the Taylor case, supports our argument in the new trial motion and makes it difficult if not impossible for Jones to defend the punitive damages award. In short, they are now adverse to their own client. We will have fun with this at the hearing and it should be very helpful to our argument.

EINGEGANGEN  
05. Nov. 2021

Marc GILLIERON  
Partner

[mg@chabrier.ch](mailto:mg@chabrier.ch)

Emilie THEINTZ  
Associate

Regionalgericht Oberland **EINSCHREIBEN**

15. OKT. 2021

Regionalgericht Oberland  
Verwaltungsgebäude Selve  
Scheibenstrasse 11B  
3800 Thun

Postaufgabe Nr. 14. 10. 21

021

mloads/211014%20Attachments%20request%20for%20CV%2021%202670.pdf

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**A. Forderungen der Amstg/Beiligerin**

1. Mit Urteil vom 3. Februar 2021 (nachfolgend: «das Urteil») verurteilte der Superior Court of the State of California Herrn Aliviades DAVID (nachfolgend: «Herr DAVID» oder «der Geschädigte») wegen sexueller Belästigung von Frau Mahim KHAN (nachfolgend: «Frau KHAN» oder «die Geschädigte»).

**Beilage 1** Corrected Amended Judgment vom 3. Februar 2021

2. Das Dispositiv des Urteils lautet wie folgt:

«NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED that Plaintiff Mahim Khan recover from said Defendants Aki David Productions, Inc., Filmon TV, Inc., and Aliviades ("Aki") David, jointly and severally for damages in the amount of

**\$8,250,000** with interest thereon at the rate of ten percent (10%) per annum from the date of entry of the Judgment on January 21, 2020 until paid.

NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED that Plaintiff Mahim Khan recover from said Defendant Aliviades ("Aki") David damages in the amount of

**\$50,000,000** with interest thereon at the rate of ten percent (10%) per annum from the date of the entry of the Judgment on January 21, 2020 until paid.

**IT IS FURTHER ORDERED, ADJUDGED AND DECREED that**

Pursuant to the Court's Order of September 1, 2020, Plaintiff Khan shall have and recover from Defendants Aki David Productions, Inc., Filmon TV, Inc., and Aliviades ("Aki") David, jointly and severally:

Attorneys' fees in the amount of **\$1,388,885**, and costs in the amount of **\$74,165.60**, plus interest thereon at the rate of ten percent (10%) per annum from the date of entry of this Corrected Amended Judgment until paid.»

**In ihrer Übersetzung**

«DARUM WIRD ANGEORDNET, ERKANNT UND BESCHLOSSEN, dass der Klägerin Mahim Khan von den Beklagten Aki David Productions, Inc., Filmon TV, Inc., and Aliviades ("Aki") David, gesamtschuldnerisch, Schadenersatz in Höhe von:

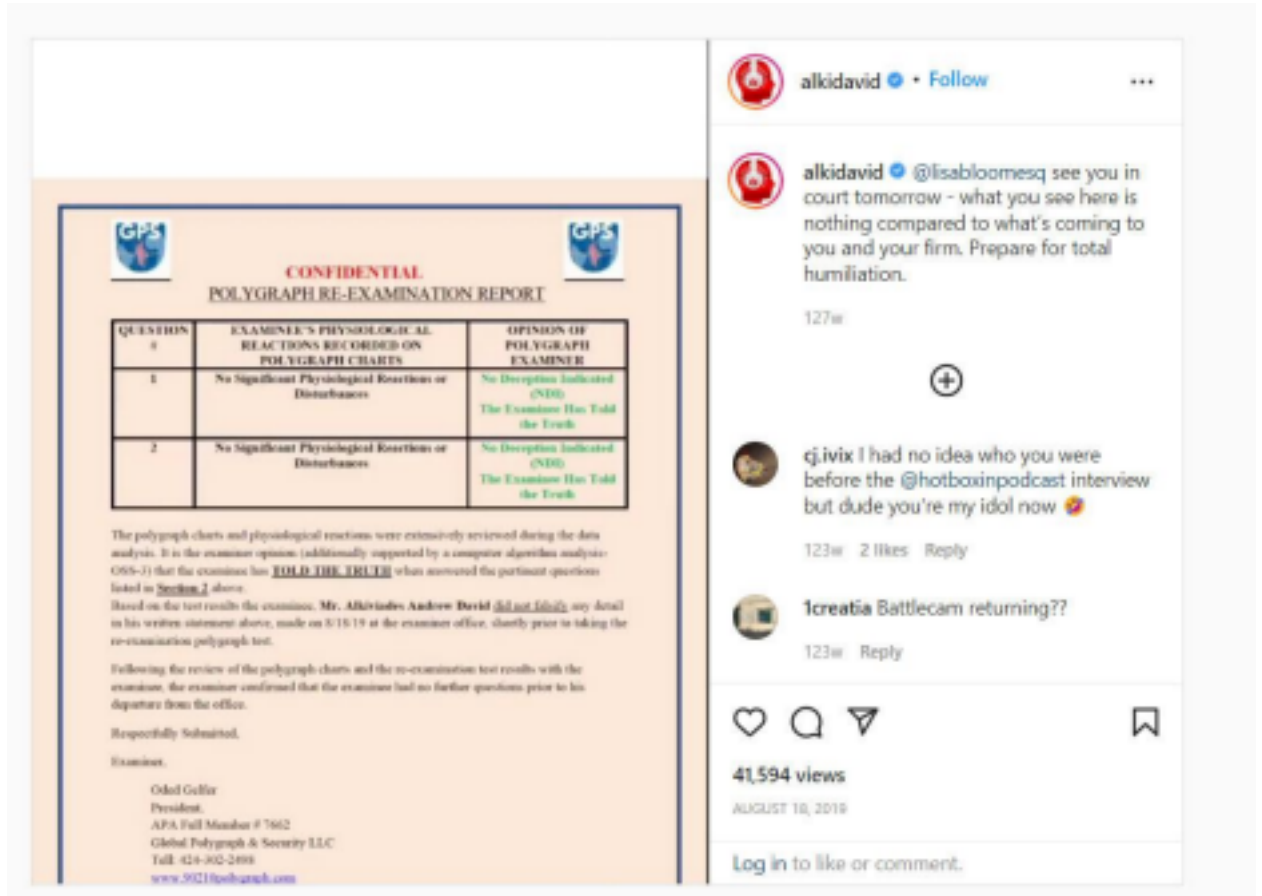
**\$8'250'000** zuzüglich Zinsen in Höhe von zehn Prozent (10%) pro Jahr ab dem Datum des Urteils vom 03. Februar 2021 bis zur Zahlung.

**DARUM WIRD ANGEORDNET, ERKANNT UND BESCHLOSSEN, dass der Klägerin Mahim Khan von dem Beklagten Aliviades ("Aki") David Schadenersatz in Höhe von:**

INSERT: POLYGRAPH IMAGES FROM TOP OF DOCUMENT

<https://www.instagram.com/p/B1Vhe9NgUoC/?igshid=YmMyMTA2M2Y=> INSTAGRAM POLYGRAPH

**First Cause of Action  
FEDERAL RICO 18 U.S.C. 1862(b)**



**ADD other images from the Polygraph - Alki - the other polygraph images are in the drive but the “share” and “copy and paste” functions do not migrate those images over to this document - Sooooo - what do we do?**

through XXXX of this Complaint.

18 U.S.C. 1862(b) states that “It shall be unlawful for any person through a pattern of racketeering activity to acquire or maintain, directly or indirectly, any interest in or control of any enterprise, which is engaged in, or the activities of which, affect, interstate or foreign commerce.”

Upon information and belief, the Attorney Defendants conspired to pursue vexatious litigation against Plaintiff David and the Entity Defendants by filing spurious and unfounded lawsuits against Plaintiffs, seeking to extort Plaintiff David and the Entity Plaintiffs, and trying to force Plaintiff David and the Entity Plaintiffs to settle the Litigating Defendants’ spurious claims.

Upon information and belief, **(Alli and Carl Affidavits provide this good faith basis) INSERT CARL AND ALLI’S AFFIDAVITS**

Attorney Defendants Girardi, Allred, Bloom, Goldberg and Chora intentionally conspired to recruit employees and independent contractors of Plaintiffs FilmOn and Anakando and former employees of the Entity Plaintiffs, to independently file tort lawsuits against Plaintiff David alleging he committed sexual misconduct in order to extract and extort money from Plaintiff David and the Defendant Entities

in furtherance of an enterprise specifically designed to enrich Defendants and the Individual Defendants with whom they conspired to concoct and fabricate non-meritorious claims against Plaintiff David and the Entity Plaintiffs.

Specifically, Defendant Attorneys and their agents and employees mercilessly and maliciously pursued Plaintiff David and the Entity Plaintiffs, in courts as well as in the media, seeking to force Plaintiff David to settle with the parties who sued Plaintiff David and the Entity Plaintiffs. *Alki wishes to point out that with regard to a nexus between Allred and Dordick* - this pleading should show a connection between those Defendant Attorneys as to Jane Doe but also

**Pattern** Dordick and Allred are sharing the litigation asserted against Alec Baldwin - representing two separate crew members against Alec, Wynn and Rose McGowan TEXT MESSAGE **INSERT ROSE'S TEXT MESSAGES** - and Marciano - State Bar **50 Cent**

<http://www.tvmix.com/la-court-gives-ok-to-hollywood-actress-rose-mcgowan-fraud-suit-against-harvey-weinstein-and-lisa-bloom/123>

Rose has a bit of a win with defamation going forward.

**In a season of shocking trials, the L.A. Superior Court case stands out for the**

judge's determination to keep the defendant from defending himself. At every turn, [Judge Michelle Williams Court](#) has sided with the plaintiff. Here's what we know so far:

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**1. Why is Alki David not being allowed to testify in his defense?**

There is a discrepancy about whether pretrial depositions were handled correctly on both sides. The Judge Court has taken this as an excuse to entirely exclude David's "day in court."

She blocked him from representing himself, as he intended to do, and his attorney Ellyn Garofolo of Venable, is not allowed to call him as a witness. The only way he could look the jury in the eye under oath and have the chance to say, "I didn't do it." is if Allred's junior partner Nathan Goldberg called him to the stand. Obviously Goldberg won't do that.

**2. But isn't there other evidence, and other witnesses, to show David's innocence?**

There is. But Judge Court is not allowing even one witness for the defense. Not even to rebut the plaintiff's new claims and out-of-the-blue embellishments that no one had heard before the trial started.

**3. Why did Mahim Khan lie about having a work email address? Surely that impeaches her?**

Mahim Khan lied on the stand about ever having a FilmOn.com work email address. She did have one, and used it nearly daily while she was employed there. Garofolo called FilmOn's Head of IT to testify to this and show the archived emails to the jury, but was blocked by Judge Court. This lie would be just one of many lies the defense has ready proof of, but it's one of the most clear cut and unquestionable matters that thoroughly impeaches Khan as a bold and relentless liar.

**4. Why were there no consequences when Allred's team was caught forging opposing counsel's signature?**

In a brazen act of criminality, Gloria Allred's team changed the witness and evidence lists mid-trial (taking advantage of a day Garofolo's home was under evacuation during the devastating wildfires in Los Angeles), and [faked the](#)

[paperwork](#) to say Garofolo had seen and approved the changes. Garofolo filed a very clear notification of this to Judge Court, who ignored the transgression. Forging an opposing counsel's signature on official papers is fraud and is a felony offense. Though [Judge Court decided to not do her duty](#) on this, no doubt repercussions for Allred will come eventually.

## 5. Who were Khan's super shady witnesses?

Khan called four witnesses. One, Nick Hyams, also known as rapper Lush One and the son of B-Movie director Peter Hyams, is known widely to have been involved in a gun incident at the FilmOn offices. At the time, David learned Hyams had brought the gun to the office and banned him from coming back, and hired more security to protect the staff. Garofolo moved in to use the outright lie to impeach the witness, but once again, Judge Court blocked her from any action. Hyams is a failed rapper who has been in and out of rehab throughout his life and has staged violent incidents for publicity purposes.

But most importantly, Hyams' account of what he allegedly saw in the office was very different from what Khan has alleged. He added multiple incidents to his account. In the key incident, one in which David allegedly touched Khan's chest, Khan has described wearing a low cut yellow summer dress. Hyams said it was a bulky black sweater, and that Khan, because of her Muslim faith, would never wear anything revealing. Hyams said he was at the FilmOn offices daily, which was not true, he was there on a project basis. Hyams also showed he was lying when he described an incident involving another accuser Elizabeth Taylor at the office—contradicting even Taylor's own account of the day she participated in "wheelbarrowing" across the office (In Hyams' account David "Threw Taylor over his shoulder"). This shows Hyams is lying about having witnessed the incident. Hyams recounted spending extensive prep time with Goldberg over dinner the night before his testimony.

Hyams was also so rattled on the stand by Garofolo he called her a racist. (Both he and Garofolo are white).

Khan also called Hyams' ex-wife Helen Davis. Helen said she was a full-time employee of FilmOn Networks—itsself a bold lie since she was under the same third party contract agreement as Hyams via his Fresh Coast company. She never had her own desk, she did not work a regular schedule. Davis was also at the famous dinner at Cafe Roma where the web of connected allegations against David being tried by Gloria Allred and Lisa Bloom is known to have

been hatched (more about that below). Davis also spoke about having been prepped by Goldberg on what to say in court.

Most tellingly, Allred and Khan do not have one witness who was a regular, day-to-day employee of FilmOn. The incidents she alleged supposedly

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happened in the open-plan office during normal hours, and supposedly happened on a regular basis—yet not one regular employee saw or heard of any of these things at the time.

#### **6. Was Lauren Reeves a legitimate “MeToo” witness?**

In a word, no. Lauren Reeves, another client of Allred Maroko & Goldberg’s, worked at FilmOn starting four months after Khan quit. Over and over again Allred and her daughter have used a peculiar loophole in California law that allows witnesses to make completely unrelated allegations, even if they stand to gain financially from the outcome of the trial. A “MeToo” case is the only kind of trial that allows this testimony—it is not allowed in any other kind of case. Reeves never witnessed anything to do with Khan, and her time at FilmOn did not overlap in any way with her employment there.

Reeves herself lied in her own trial, and even her own doctor said most of her problems stemmed from past abuse, both by her 7-foot tall lumberjack father beating her and her scary New York boyfriend who threatened to kill her. Many of her lies are [covered here](#).

#### **7. Diagnosis-on-Demand. Who was that goofy British UCLA shrink on the stand?**

Doctor Anthony Edwards Reading, is a well known shrink-for-hire. He testified that he spends 3.5 days a week giving legal testimony and evaluations for MeToo cases. He spends half a day with actual patients, and teaches one class in the afternoon. On Friday, he golfs.

Dr. Reading has testified in Allred Maroko & Goldberg cases ten times in 2019, by his own admission. He testified that between the evaluation and court testimony he made a minimum of \$8,000 per Allred client. That means Reading made at least \$80,000 from Allred Maroko & Goldberg so far this year. Why? Because he reliably gives them what they are paying for. Reading testified in court last week under questioning by Garofolo that he has a nearly 100% record of finding PTSD in plaintiffs alleging sexual misconduct. The few

times he's been asked to do his work for the defendant's side he miraculously has found nearly zero cases of PTSD in the accuser. Wow!

Using these quack doctors with their Diagnosis-on-Demand techniques is a regular tactic for Allred and Bloom. Similar doctors have appeared in all of their trials against David. In the Elizabeth Taylor case, brought by Bloom, it backfired a bit—her doctor testified that she had been on her elaborate cocktail

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of psychoactive prescription drugs before she worked at FilmOn and that he had seen no reason to change the dosages after—though he did say that her mental health could be declining into paranoia because of having been on the drugs so long. In the Reeves case her UCLA shrink had been paid for by Allred Goldberg & Maroko, who she had worked for for years. Purely corrupt. UCLA should really look into the ways in which these Diagnosis-for-Hire “doctors” are using the university's prestigious name.

8. Is David being blamed for damage done by Khan's father during 20 years of extreme physical and mental abuse?

Dr. Reading had spent only five hours with Khan before coming up with the diagnosis Allred asked for. Within that time, Khan declined to tell him about her primary mental health care—an unlicensed alternative “doctor” provided by her mosque. Reading also ignored the fact that Khan had been abused by her own father while she was still a toddler. Abuse that often ended up with her bloodied and bruised. He beat her physically right up until she left the house at age 20, just a few years before winding up at FilmOn.

“Could 20 years of extreme abuse have contributed to Khan's mental health issues?” asked Garofolo.

“No, no,” said Reading. “She had handled all that quite well. But working at FilmOn undid all that and caused her to fall apart.”

9. What would Alki's witnesses say if they were allowed to be called?

One, Lauren Berkley, who was Khan's best friend, will testify that Khan was planning for months to leave the U.S. for Dubai in her final days at FilmOn. She did not quit because of anything going on at work, she quit because she was planning to move away. Berkley can also testify that despite being Khan's best friend and talking to her nearly daily while working at FilmOn, Khan never hinted at any harassment problems there.

Khan was so infuriated by Berkley telling the truth in the preparations for the trial that she [threatened to harm Berkley's two-year-old baby](#). A Connecticut police report shows Berkley was so scared by the threat she felt she needed to take action. Khan may have gotten the idea to use threats in this way from Gloria Allred herself, who according to the Daily Beast, gave her own client, [Trump-accuser Summer Zervos](#), a mafia-style threat when she wanted to leave her firm.

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#### 10. What about Alki David's outbursts in court?

It was widely reported that David lost his sh\*t in court on several occasions, sometimes with the help of sheriff's deputies.

“The judge would not let me speak the truth,” David told our reporter. “And I was just sickened by what was going on. I had to get the truth out: I didn't touch Mahim Khan. I've never touched an employee inappropriately. Also, the perversion of justice being perpetrated by Lisa Bloom and Gloria Allred will hurt everyone—it needs to be stopped.”

When David was allowed to speak in court, during *Elizbeth Taylor v. Alki David* in September, the trial ended in a [mistrial with the jurors favoring David 8-4](#). Several said they felt like Taylor, and her star witness Chasity Jones, were lying. (Jones was another MeToo witness with claims against David—who has an interest in more cases being found against him to support her win in court in May which is expected to be turned over under appeal).

David also has been trying to get judges to see the bigger picture of a conspiracy among these linked plaintiffs and the linked law firms of Allred and Bloom, something Judge Terry Green said had credence during the Reeves trial. So far, no court has allowed evidence of the conspiracy to be heard in court—so David has taken it upon himself to let people know when he can.

#### 11. How are all the cases against Alki David linked?

The web of harassment cases brought against David all come from a single source. In June of 2015, Gloria Allred is believed to have broken the law and shown disgruntled employee Elizabeth Taylor a settlement David had made with Mary Rizzo, a woman he had had a consensual relationship with, and her

attorney Lisa Bloom. Taylor brought that settlement news to a dinner at Cafe Roma in Beverly Hills where Chasity Jones, Helen Davis, Mahim Khan and others were present. Rizzo can testify that she heard from the people attending that dinner, that the settlement news inspired a plot to extort David, and that each would testify for each other as needed. Allred and Bloom encouraged these people to bully others into joining the web. Text messages show them putting pressure on each other and even offering money and jobs if they'll file their own cases.

Rizzo has said that Khan said Allred wouldn't take her case unless she recruited two more clients for her—at least one of those became Jones.

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How can Rizzo talk about this? Bloom violated the privacy agreement multiple times during the Elizabeth Taylor case, shaming Rizzo by name, and putting it all into public record. No doubt Rizzo will be taking legal action against Bloom and her unethical actions soon.

Since Allred and Bloom work on contingency, they get nearly half of whatever is awarded to their clients—millions of dollars. They are clearly trying to cash in before reform comes to the industry, and trying to notch up some wins to distract the media from their [horrible misdeeds related to Harvey Weinstein](#). Bloom actively helped attack his accusers with media campaigns designed to make them seem crazy. In fact she told Harvey her previous MeToo clients were all crazy and liars. She is being sued by Rose McGown and many prominent stars have called for her to be disbarred. Allred is also under fire after The New York Times revealed she profited from brokering [numerous lucrative hush money payments](#) to Harvey accusers over a decade ago. Those payments silenced his alleged victims and without Allred's work, dozens of more victims of Harvey might have been spared their experiences.

**12. Why is Judge Michelle Williams Court acting in such a biased manner?**

It's very hard to understand. Every objection by Elyn Garofolo, a well respected attorney from the well respected firm Venable, has been overruled. Every move she has made to work within proper protocols and the legal structure to get evidence and witness in has been shut down. Even attempts to follow up on obvious lies by the plaintiff and her witnesses have been shut down.

One prominent Los Angeles attorney who asked that his name not be used for fear of reprisals told us: "L.A. Superior Court is corrupt. That's all there is to

**it. It could be favors, it could be political grandstanding for future appointments, it could even be cold hard cash. The judges are all over the map. You go into that building and it's like Chinatown in that Jack Nicholson movie. Just forget it."**

**A media expert saw a different potential explanation: The plaintiff's case had so many holes in it there was nothing to do but cheat. Why Judge Court has seemed to be helping them every step of the way is a mystery.**

**"The truth will come out," said Alki David. "This Judge, for whatever reason, does not want to see justice done in her own courtroom. It's not justice if a person can't defend themselves. This really should be a mistrial—but if I have**

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**to I'll continue to fight until the truth comes out, no matter where that takes me."**

**"I've also hired three major UK law firms to go after Allred and Bloom and this sick scheme to extort me," David continued. "We will show the world what they really are.**

**Others are beginning to show how corrupt they are, including Rose McGowan, Tony Cardenas, Steve Wynn, and more. Even their own former clients like Summer Zervos and Kyle Hunt and Mary Rizzo, who is now helping in my case, want the world to know how corrupt they are."**

**Add Chastity and Mary Rizzo signed sworn affidavits attesting that Mahim**

**Kahim and Elizabeth Taylor were extorting Alki. Then, Chastity Jones herself tried to extort Alki.**

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Anheuser-Busch

GAVIN NEWSOM - Published June 22, 2021 11:26am EDT

# Gavin Newsom has longstanding ties to Dem power player facing lawsuits, investigations

Girardi has backed many a Democratic candidate, including Newsom

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Los Angeles Times @latimes

He could get Govs. Gavin Newsom and Jerry Brown on the phone with ease, associates said.

He and then-wife Erika Jayne regularly traveled to Washington, D.C., where then-Senate Majority Leader Harry Reid appointed him to a Library of Congress board.



latimes.com  
 'Real Housewives' attorney Tom Girardi used cash and clout to forge political c...



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# Donations to News Campaign

**Major Donor and Independent Expenditure Committee Campaign Statement**  
(Government Code Sections 84200-84218.5)

MAJOR DONOR AND INDEPENDENT EXPENDITURE COMMITTEE STATEMENT

Type or print in ink. **TOM GIRARDI**

Date Stamp: **CALIFORNIA FORM 461**

Amendment

SEE INSTRUCTIONS ON REVERSE

<p><b>1. Name and Address Of Filer</b></p> <p>NAME OF FILER (Include name(s) of all affiliated entities whose contributions are included in this statement.) Thomas V. Girardi</p> <p>MAILING ADDRESS (NO. AND STREET) [REDACTED]</p> <p>CITY STATE ZIP CODE Los Angeles CA 90017</p> <p>RESPONSIBLE OFFICER (If filer is other than an individual) Thomas V. Girardi</p>	<p><b>3. Summary</b> (Amounts may be rounded to whole dollars.)</p> <p>1. Expenditures and contributions (including loans) of \$100 or more made this period. (Part 5.) ..... \$ <u>34200.00</u></p> <p>2. Unitemized expenditures and contributions (including loans) under \$100 made this period..... \$ <u>0.00</u></p> <p>3. Total expenditures and contributions made this period. (Add Lines 1 + 2.) ..... <b>SUBTOTAL</b> \$ <u>34200.00</u></p> <p>4. Total expenditures and contributions made from prior statement. (Enter amount from Line 5 of last statement filed. If this is the first statement for the calendar year, enter zero.) ..... \$ <u>43000.00</u></p> <p>5. Total expenditures and contributions (including loans) made since January 1 of the current calendar year. (Add Lines 3 + 4.)..... <b>TOTAL</b> \$ <u>77200.00</u></p>	<p>Statement covers period from <u>07/01/2018</u> through <u>12/31/2018</u></p> <p>Date of election if applicable: (Month, Day, Year)</p>				
<p><b>2. Nature and Interests of Filer</b> (Complete each applicable section.)</p> <p><input checked="" type="checkbox"/> A FILER THAT IS AN INDIVIDUAL MUST LIST THE NAME, ADDRESS, AND BUSINESS INTERESTS OF EMPLOYER OR, IF SELF-EMPLOYED, THE NAME, ADDRESS, AND NATURE OF THE BUSINESS</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">NAME OF EMPLOYER/BUSINESS Girardi &amp; Keese</td> <td style="width: 50%;">BUSINESS INTERESTS Law Firm</td> </tr> <tr> <td colspan="2">ADDRESS OF EMPLOYER/BUSINESS Los Angeles CA 90017</td> </tr> </table>	NAME OF EMPLOYER/BUSINESS Girardi & Keese	BUSINESS INTERESTS Law Firm	ADDRESS OF EMPLOYER/BUSINESS Los Angeles CA 90017			
NAME OF EMPLOYER/BUSINESS Girardi & Keese	BUSINESS INTERESTS Law Firm					
ADDRESS OF EMPLOYER/BUSINESS Los Angeles CA 90017						

Plaintiffs assert, pursuant to 18 U.S.C. §§1962(b)(c) and (d), that the Attorney Defendants, their clients, experts, employees and agents, conspired with one another and intended to and willfully conducted an inter-related, clear and continuous pattern of racketeering activity to benefit Defendant Attorneys' unlawful enterprise, and that Defendants continue to do so, by, inter alia, wilfully and intentionally conspiring against Plaintiff David and the Entity Plaintiffs by filing spurious lawsuits against Plaintiff David and the Entity Plaintiffs (which entity plaintiffs were named in which suits?), who were, and continue to be, victimized by Attorney Defendants' continuous pattern of racketeering conducted to benefit their enterprise, including mail fraud, extortion, falsification of a signature in a civil proceeding, bribery, and aiding and abetting, all cognizable as RICO predicate acts pursuant to 18 U.S.C. §§ 1862(b)(c) and (d).

Specifically, the Attorney Defendants filed unethical, spurious lawsuits against Plaintiff David without investigating the merits of those actions, unethically coaching their clients and witnesses about what to say, only to then often dismiss some of those complaints years later when trial proceedings were forthcoming. Further, the Defendant Attorneys conspired to tamper with witnesses and to have witnesses collude against Defendant David and the Entity Plaintiffs by sharing the actions against Plaintiffs David and the Plaintiff Attorneys. Defendant Allred kept Defendant Mahim Kahn and Defendant Lauren Reeves as clients, but sent Defendant Elizabeth Taylor to Defendant Bloom, her daughter. After Defendants Reeves, Taylor and Jones conspired to sue Plaintiff David and the Entity Plaintiffs, Subsequently, Defendant Bloom was retained by Defendant Chastity Jones, all with an effort to extort money from Plaintiff David and the Plaintiff Entities.

In October, 2019, Judge Ongkeko of the Los Angeles Superior Court

admonished Defendant Bloom for significantly overstating her already very expensive law firm bills submitted to the Judge when Jones won a compensatory award against Plaintiff David. Tellingly, the Judge said, “If I were a Bloom client - one that was actually paying out of pocket instead of these sad ambulance chasing contingency cases - I’d be very careful to go over the firm’s bills before I paid anything,” Judge Ongkeko said. Such over-billing and seeking to bilk Plaintiff David is just one of innumerable events demonstrating that Defendant Bloom extorted money from Plaintiff David and the Entity Plaintiffs.

Defendant Allred wrongfully sought to enforce a judgment against Plaintiff David *and his family*, none of whom were parties to any relevant litigation filed by Defendant Attorneys, in Switzerland in *Mahim Kahn v. Alki David, et. al*, in violation of Swiss law. The Swiss courts rejected those efforts as appellate proceedings are ongoing in that case, causing Plaintiff David extreme expense and further damaging his reputation as such filings are public record. Further, in *Lauren Reeves v. Alki David, et. al*, Defendant Allred again sought to enforce a judgment against Plaintiff David *and his family*, none of whom were parties to any relevant litigation filed by Defendant Attorneys.

In response, Plaintiff David filed criminal proceedings in Switzerland against Defendants Allred, Bloom and Girardi alleging that those Defendants

conspired to discredit and extort Plaintiff David - **append**. Upon information and belief, the Swiss Court will impose???? **can Swiss Counsel provide proper language summarizing that country's laws.**

Defendant Allred's corrupt, wilful and intentional actions, constituting criminal acts under relevant Swiss law, were committed under the auspices of an otherwise legitimate enterprise, Allred, Maroko & Goldberg.

The Attorney Defendants' conspiring to extort and extorting money from Plaintiff David and the Attorney Defendants, and the Attorney Defendants, were actions committed under the auspices of otherwise legitimate enterprises as follows: Allred, Maroko & Goldberg, The Law Offices of Lisa Bloom; Girardi Keese; Dordick Law Corporation; Chora, Young & Manasserian and The Law Offices of Ebby S. Bakhtiar.

Accordingly, Plaintiff David and the Entity Defendants sue all Attorney Defendants for injuries to Plaintiff David's and the Entity Plaintiffs' businesses and properties directly and proximately caused by reason of the Attorney Defendants' mail fraud, bribery, extortion, witness tampering, predicate claims pursuant to RICO.

**Moreover, Girardi's former partner, Gary A. Dordick, formed his law offices independently and coordinated and conspired with Girardi, Allred and Lisa Bloom, sharing documents in the various lawsuits against Plaintiff Alki David and the Entity Plaintiffs. At times, those documents were not revealed in discovery in the various proceedings.**

**Further, Defendant Keith Griffin, formerly of the Girardi firm has joined the Dordick Law Firm, whose principal is Defendant Gary A. Dordick.**

**Note: Relevant law instructs that we need a strong factual nexus suggesting coordination between the defendants.**

- 1. Quote Ellyn's signature being forged and the witnesses and exhibits list being manipulated - the judge did nothing.**

Defendant Attorneys Girardi, Allred, Goldberg and Bloom were part of an initial enterprise consisting of a union or group of individuals with a common purpose that are associated in fact. Defendant Attorneys Delores Y. Leal, Renee Mochkatel, Dordick, Griffin, Choro, **WHAT OTHERS?** also joined the enterprise. ADD: Recount the details of the following:

The enterprise has as its purposes, extortion, mail fraud, and obstruction of justice, in order to deprive Plaintiff David and the Entity Plaintiffs of their money and property.

The relationship of the parties consists of informal and formal agreements and understandings to cause harm, threaten, embarrass and defame through unlawful means, including, but not limited to, the filing of spurious lawsuits with longevity - a scheme that began in 2014.

The members of the enterprise are manifold and they share a common purpose of enhancing their reputations as attorneys, and of seeking to extort payments from Plaintiff David and the Plaintiff Entities by means of their illegal

concerted actions and conspiracies. Each and every member of the enterprise intended to engage in the conduct harming Plaintiff Alki and the Entity Plaintiffs and they did so with actual knowledge of their illegal activities.

The various harassing practices asserted against, and lawsuits filed against, Plaintiff David and the Plaintiff entities share an uncanny and unethical pattern. First, Defendant Attorneys would coach employees of Plaintiff David's companies about what to say at press conferences called by Defendant Attorneys Allred, Goldberg, and Bloom after Defendant Attorneys filed hastily composed legal complaints against Plaintiff David and Plaintiff Entities. **Do we need to add Girardi? Did Goldberg have any press conferences?**

Upon information and belief, Defendant Attorneys filed lawsuits without conducting a due diligence investigation into the verity of the allegations set forth in those lawsuits. Not only did those filings constitute manifest abuse of the legal process as they were entirely devoid of any supporting documentary or factual evidence, as proscribed by relevant ethical standards governing attorneys practicing law. They also are cognizable under RICO because the filing of those spurious lawsuits furthered the Defendant Attorneys' criminal enterprise and thereby harmed Plaintiff David and the Plaintiff Entities. Members of the enterprise who intended to engage in the witness tampering to harm Plaintiff Alki and the Entity Plaintiffs in the *Mahim Kahn* lawsuit were Attorney

Defendants Girardi, Allred, Goldberg, Leal and Mochkatel and Attorney Defendants did so with actual knowledge of their illegal activities.

**Here, we need to allege:** that there was an association in fact having a common purpose and that there is evidence regarding the continuity of the illegal enterprise organization and that its members function as a unit. *U.S. v. Christensen*, 828 F.3d 763, 780 (9th Cir. 2015)(quoting *U.S. v. Eufrazio*, 935 F.3d 553, 557 n. 29 (3d Cir. 1991)(internal quotation marks omitted). *Odom v. Microsoft Corporation*, 486 F.3d 541 (9th Cir. 2007)(en banc), *cert denied*, 128 S.Ct. 464 (2007).

To do so, we need to show: 1) evidence of hierarchy - Girardi-Allred-Bloom and now Goldberg etc. 2) Role differentiation, chain of command - we must discuss this to demonstrate that there is an association-in-fact enterprise.

Insert quotes from this trial transcript [FW: Ali Botto - Vol. 13 - October 4, 2019 Testimony.pdf - filmonpersonal@gmail.com - Gmail \(google.com\)](#) Also demonstrate that the Court in Mahim Khan was made aware of the conspiring between the various former employees who interacted with one another to concoct claims against Plaintiff David. [FW: 139167.491786 Khan v Hologram USA, Inc, et al. \(BC654017\) - filmonpersonal@gmail.com - Gmail \(google.com\)](#)

Defendant Goldberg in the *Reeves* case represented Reeves<sup>7</sup> and he shared documents that Defendant Goldberg and his partners and firm had not listed on the list of witnesses and exhibits her filed in that matter. He wrongfully sought to use undisclosed documents he exhibits he obtained from Bloom.

Not only did the Attorney Defendants commit such wrongdoing during the *Reeves* trial, Plaintiffs' counsel in *Mahim Khan* committed gross ethical violations during his closing argument and violated Plaintiff David's constitutional and due process rights. [Khan ARB conformed - Google Docs](#) - Add specifics.

Rothman sought a meet and confer meeting about interrogatories he had generated in that litigation, referencing Reeves' use of a phone (more than one phone perhaps?) that she claimed helped bolster her claims against Plaintiff David.<sup>8</sup>

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<sup>7</sup> *Elizabeth Taylor, an individual, Chastity Jones, an individual v. Alkiviades David, an individual, Hologram USA, Inc. a Delaware Corporation, Hologram USA Entertainment, a Delaware Corporation, FilmOn Media Holdings, Inc., a Delaware Corporation, FilmOn TV, Inc., a Delaware Corporation; FilmOn TV Networks, Inc., a Delaware Corporation; Alki David Productions, Inc., a Delaware Corporation, Anakando Media Group USA et. al.*, Case No. BC649025, Superior Court of the State of California, Los Angeles-Central District.

<sup>8</sup>

[https://mail-attachment.googleusercontent.com/attachment/u/0/?ui=2&ik=68ad5627e5&attid=0.1&permmsgid=msg-f:1581550983980536602&th=15f2cc3d9254531a&view=att&disp=safe&saddbat=ANGjdJ9-5bpRafrPc6mzVjKA3XI0-ayZU7civdXpsd83db8fANLjou0wH6gkHQitU6I6glB2oTWBBW3QENef-uHEQi8uCtR1Q106GKiQb8tbarCdfhAFWgg8LVANTNjBJZXxG\\_e\\_Q5K1A8XJKB64JVy6sSB4rzkkOYY7AzKnZRG7jIhW7bXi\\_EK8DHuWxf9H3W4q6iyThtqtJBxZwBdYxPWUZZDF2Vsm1Du3tU6RaeVn8ufRVXWamy\\_uUWhGy4kXh5Fli8MF8eud\\_NL8D0ar9SyjM5ea\\_n1ukQ\\_Ouj2umUYkIza-\\_FELth5XIFPHuCRQgdWjYo99iaUX8N\\_U2VZMxcWK67W8DNcnwloh3FTh eQqZSkSFac2raYoI7HFVL425j2jvqeTPLgkQBJTwcZA9ykbUM8Kp6xMcIj969CgAdEJ MmjgzxnFQw4zYeJjhp9amLull-qop28yDla8xy5ecquyB5FkqeKM8Vax3XdWZCtKZs4c A\\_XVf8HwXOpVk9\\_wGwh0P7hGJVy0pR3RBKb\\_T3WUN7Fxc-GPWI0fOpGZRnhhg H\\_NWsNR8Jo5rvrVxEpWM6S0-st\\_YhCrVHLp3xIE1zaIGXMmH6ly89w6yrnBWvcD6 B1\\_7VIPVeipqhqd-Zc3-hHlnO7z45w1B9HhJQbE1j7\\_hTBReDMIYx7oV95ahboF1QE1](https://mail-attachment.googleusercontent.com/attachment/u/0/?ui=2&ik=68ad5627e5&attid=0.1&permmsgid=msg-f:1581550983980536602&th=15f2cc3d9254531a&view=att&disp=safe&saddbat=ANGjdJ9-5bpRafrPc6mzVjKA3XI0-ayZU7civdXpsd83db8fANLjou0wH6gkHQitU6I6glB2oTWBBW3QENef-uHEQi8uCtR1Q106GKiQb8tbarCdfhAFWgg8LVANTNjBJZXxG_e_Q5K1A8XJKB64JVy6sSB4rzkkOYY7AzKnZRG7jIhW7bXi_EK8DHuWxf9H3W4q6iyThtqtJBxZwBdYxPWUZZDF2Vsm1Du3tU6RaeVn8ufRVXWamy_uUWhGy4kXh5Fli8MF8eud_NL8D0ar9SyjM5ea_n1ukQ_Ouj2umUYkIza-_FELth5XIFPHuCRQgdWjYo99iaUX8N_U2VZMxcWK67W8DNcnwloh3FTh eQqZSkSFac2raYoI7HFVL425j2jvqeTPLgkQBJTwcZA9ykbUM8Kp6xMcIj969CgAdEJ MmjgzxnFQw4zYeJjhp9amLull-qop28yDla8xy5ecquyB5FkqeKM8Vax3XdWZCtKZs4c A_XVf8HwXOpVk9_wGwh0P7hGJVy0pR3RBKb_T3WUN7Fxc-GPWI0fOpGZRnhhg H_NWsNR8Jo5rvrVxEpWM6S0-st_YhCrVHLp3xIE1zaIGXMmH6ly89w6yrnBWvcD6 B1_7VIPVeipqhqd-Zc3-hHlnO7z45w1B9HhJQbE1j7_hTBReDMIYx7oV95ahboF1QE1)



Defendants Girardi, Allred and Bloom made threats intended to cause economic harm to Plaintiff David and to the Entity Plaintiffs. The threats were intended to extort settlements. The threats were intended to cause reputational harm to Plaintiff David. The threats were wrongful because Defendants Girardi, Allred and Bloom used the threats and maligned Plaintiff David's reputation to try to obtain property to which they were not entitled.

Defendants Girardi, Allred, Bloom and Goldberg are guilty of extortion because they sought money or property to which they did not have, and could not reasonably believe they had, a claim or right.

Plaintiff David and the Entity Plaintiffs suffered damages and incurred substantial losses as a result of Defendants Girardi, Allred, Bloom's and Goldberg's implementation and continuation of their extortionate claims.

The Defendant Attorneys tampered with the Litigating Defendants' testimony, and with the evidence Defendant Attorneys used to assert the spurious complaints made by Defendant Litigants, all with an effort to extort money from Plaintiff David and the Plaintiff Entities.

The Defendant Attorneys tried to extort Plaintiff David and the Plaintiff Entities by making spurious allegations against those Plaintiffs, often calling press conferences to assert their nefarious claims and touting the large award against Plaintiff David in *Mahim Khan*, even as it remains under appeal. *See e.g.*, <https://www.phillymag.com/news/2021/12/21/gloria-allred>.

The Attorney Defendants' conspiring to extort, and their extorting, money and property from Plaintiff David and the Attorney Defendants, and the Attorney Defendants tampering with witnesses, were actions committed under the auspices of otherwise legitimate enterprises as follows: Allred, Maroko & Goldberg, The Law Offices of Lisa Bloom; Girardi Keese; Dordick Law Corporation; Chora, Young & Manasserian and The Law Offices of Ebby S. Bakhtiar.

Upon information and belief, Attorney Defendant Chora, counsel in *Chastity Jones*, ruined \$5 Million in business lost by Plaintiffs David and the Entity Plaintiffs. **Alki - we need specificity as to which entities?**

**Further, Attorney Defendant Chora caused PAYPAL to terminate Plaintiff FilmOn's two accounts. Note to counsel:**

The CFO of FilmOn provided this information and perhaps counsel would like this in an affidavit?

According to [Isabel Ann Peterman](#), Financial Controller, Filmon TV

UK Group:

“Filmon had two accounts with PayPal 1) sales@filmon.com (old accounts,

used for over 10 years) and onlinesales@filmon.com (new opened in Jan 21

as a result of suspending the old one)

They were closed with explanation “in breach of user agreement”, consequently all funds held there were deducted and no specific reasons were provided of the cases of violation PayPal was using as an argument. Filmon lost half of its customers as a result.

a) Some PayPal stats:

- PayPal was the preferred choice of payment for our Filmon customers.
- In the last year (2020) there were a total of 61959 orders placed successfully via Paypal with an estimated value converted in GBP of £1.2m.
- Since Feb 1, 2021 when PayPal took down our account, the total amount of canceled PayPal subscriptions (users finally gone) was 5,415 (equivalent to lost sales orders per **month**)

The total amount of expected and not received incomes in 2021 because of canceled subscriptions based on 2020’s sales rate is £1.3m, without embedding any possible further lost opportunities due to company marketing efforts etc.

b) Enclosing a file of customer complaint cases. (Theses are most representative cases. There were higher number or complaints in general but in some of them. the customers did not specifically mention PayPal, so they were excluded).

c) List of canceled PayPal subscriptions (file name “r2.xls”) with encrypted emails for data protection purposes as a backup.

**Note: Ms. Peterman provided a table demonstrating the amount of monies that PayPal still has in segregated funds, stating the value of those**

**funds in USD, EU, and BGB - pounds. I could not copy that table from her email so I am asking her to send it as an attachment and I will insert it as soon as I hear from her.**

**Third Cause of Action  
18 U.S.C. Sec. 1862 (d)**

Plaintiff David and the Entity Plaintiffs restate paragraphs 1 through XXXX of this Complaint,

18 U.S.C. Sec. 1862 (d) states “It shall be unlawful for any person to conspire to violate any of the provisions of subsection (b) or (c) of this section.”

*Howard v. Am. Online, Inc*, 208 F.3d 741, 751 (9th Cir. 2000) instructs that to establish a 18 U.S.C. Sec. 1862 (d) violation, the Attorney Defendants either had to establish an agreement that constitutes a substantive violation of RICO or the Attorney Defendants had to agree, commit or participate in the violation of at least two predicate offenses. *Salinas*, 522 U.S. at 63-64 instructs, quoting Justice Holmes, that a conspiracy may exist even if a conspirator does not agree to commit or facilitate each and every part of the substantive offense.

In this case, Attorney Defendants conspired to target Plaintiff Alki David and the Plaintiff Companies.

The initial enterprise participants, Defendants Girardi, Allred, Bloom and Goldberg, knowingly agreed to facilitate the activities of each of them as they operated and managed a criminal enterprise and extorted Plaintiffs David and

The Entity Plaintiffs. All Attorney Defendants conspired with the initial enterprise participants.

Upon information and belief, Plaintiff David and the Entity Plaintiffs assert that the Attorney Defendants' pattern of racketeering activity is to target well-known individuals, such as Plaintiff David, with accusations of improper behavior, typically under the guise of a purported, falacious sexual harassment claims, and to threaten to make those allegations public, all with a wilful intent to get the target to pay up.

The Attorney Defendants unlawfully and tortiously attempted to, and in some instances did, extract millions of dollars from Plaintiff David and the Entity Plaintiffs by a concerted enterprise that consisted of calculated media campaigns, threats and intimidation, and abusive litigious actions.

Upon information and belief, the Attorney Defendants are individually vicariously liable for their co-conspirators' illegal actions conducted to further the illegal enterprise.

Plaintiff David and The Entity Plaintiffs allege that the clients of the Defendant Attorneys, Mahim Khan, Elizabeth Taylor; Lauren Reeves, and Chastity Jones (Litigating Defendants), knowingly and wilfully participated in the interrelated enterprise calculated to extort money from Plaintiff David and the Entity Plaintiffs.

Defendant Allred and her client, Mahim Kahn, attempted to file criminal charges against Plaintiff David, but, upon information and belief, were told by Beverly Hills police that they lacked the necessary evidence to support such allegations. Upon information and belief, Defendant Allred called a news conference at the Beverly Hills police station on the date she attempted to file criminal charges against Plaintiff David with the express purpose of intimidating, harassing and defaming Plaintiff David.

No such criminal charges were ever filed. Indeed, in a taped press conference, Defendant Allred stated that the standards of proof between *Mahim Kahn's* civil action and any purported criminal action thwarted the filing of any criminal action. Nevertheless, upon information and belief, despite the fact that there was no basis for filing a criminal action against Plaintiff David, Defendant Allred arranged to have a false article published in the LA Times so as to further cause Plaintiff David to suffer. [Self-appointed ambassador for 'wronged men' of #MeToo Alki David faces criminal complaint - Los Angeles Times \(latimes.com\)](#)

No such criminal charges were ever filed.

As to Defendant Allred, her pattern of manipulating witnesses, and, upon information and belief, paying the witnesses to testify in a particular

fashion, is a pattern of obstruction of justice and witness tampering that is more than fifty years old. In the landmark Supreme Court Case, *Roe v. Wade*, upon information and belief, Defendant Allred coached Plaintiff Roe about what to testify to without verifying the allegations and thereby commenced her pattern of committing obstruction of justice and tampering with witnesses, as evidenced by Plaintiff Roe's informing, soon before she died, that Allred committed those acts. See [Gloria Allred On The New Norma McCorvey Documentary \(forbes.com\)](#).

Specifically, the Attorney Defendants filed unethical, spurious lawsuits against Plaintiff David without investigating the merits of those actions, unethically coaching their clients and witnesses about what to say, only to then often dismiss some of those complaints years later when trial proceedings were forthcoming. Further, the Defendant Attorneys conspired to tamper with witnesses and to have witnesses collude against Defendant David and the Entity Plaintiffs by sharing the actions against Plaintiffs David and the Plaintiff Attorneys. Defendant Allred kept Defendant Mahim Kahn and Defendant Lauren Reeves as clients, but sent Defendant Elizabeth Taylor to Defendant Bloom, her daughter. After Defendants Reeves, Taylor and Jones conspired to sue Plaintiff David and the Entity Plaintiffs, Subsequently, Defendant Bloom was retained by Defendant Chastity Jones, all with an effort to extort money

from Plaintiff David and the Plaintiff Entities.

Defendant Allred wrongfully sought to enforce a judgment against Plaintiff David *and his family*, none of whom were parties to any relevant litigation filed by Defendant Attorneys, in Switzerland in *Mahim Kahn v. Alki David, et. al*, in violation of Swiss law. The Swiss courts rejected those efforts as appellate proceedings are ongoing in that case, causing Plaintiff David extreme expense and further damaging his reputation as such filings are public record.

Further, in *Lauren Reeves v. Alki David, et. al*, Defendant Allred again sought to enforce a judgment against Plaintiff David *and his family*, none of whom were parties to any relevant litigation filed by Defendant Attorneys.

In response, Plaintiff David filed criminal proceedings in Switzerland against Defendant Allred - append.

Defendant Allred's corrupt, wilful and intentional extortion, constituting criminal acts under relevant Swiss law, were committed under the auspices of an otherwise legitimate enterprise, Allred, Maroko & Goldberg.

The Attorney Defendants' conspiring to extort and extorting money from Plaintiff David and the Attorney Defendants, and the Attorney Defendants tampering with witnesses, were actions committed under the auspices of otherwise legitimate enterprises as follows: Allred, Maroko & Goldberg, The

Law Offices of Lisa Bloom; Girardi Keese; Dordick Law Corporation; Chora, Young & Manasserian and The Law Offices of Ebby S. Bakhtiar.

Accordingly, Plaintiff David and the Entity Defendants sue all Attorney Defendants for conspiring to injure to Plaintiff David's and the Entity Plaintiffs' businesses and properties directly and proximately caused by reason of the Attorney Defendants' extortion, witness tampering, mail fraud and bribery, all of which constitute predicate claims pursuant to RICO.

#### **Fourth Cause of Action Interference with Contract Relations**

Plaintiff David and the Entity Plaintiffs restate paragraphs 1 through XXXX of this Complaint.

#### **Defendant Attorneys' Intentionally Interfered in Plaintiff's Contracts**

**Alki - we need to go through each contract that each company had and we must meet these elements:**

Elements of the tort of intentionally interfering with the performance of a contract are: (1) a valid contact between plaintiff and a third party; (2) defendant's knowledge of this contract; (3) defendant's intentional acts designed to induce a breach **or disruption** of the contractual relationship; (4) actual breach or disruption of the contractual relationship; and (5) resulting damage.

*(Ixchel Pharma, LLC v. Biogen, Inc. (2020) 9 Cal.5th 1130.)*

**Discuss specifics with Alki re:**

**<https://www.upcounsel.com/tortious-interference-with-contract-california>**

Upon information and belief, Attorney Defendant Chora, counsel in *Chastity Jones*, ruined \$5 Million in business lost by Plaintiffs David and the Entity Plaintiffs. **Alki - we need specificity as to which entities?**

**Further, Attorney Defendant Chora caused PAYPAL to terminate Plaintiff FilmOn's two accounts. Note to counsel:**

The CFO of FilmOn provided this information and perhaps counsel would like this in an affidavit?

Also Alki had to send an email to Chora in February, 2022, saying:

Att JOSEPH CHORA

Mr Chora you must CEASE & DESIST from further communication with ALKIVIADES DAVID and anyone related to him.

Despite being repeatedly told that there is an active FBI investigation you have continued to extort and harass me and my family. You have sent Subpoenas to family members of mine just in order to harass.

Considering that you are a lawyer in California your actions are

coercive and criminal. I accuse you of being a Girardi lawyer.

I will find the links and publish them. In the meantime please cease and desist or face criminal prosecution now or in the future.

I have copied members of the FBI who you can refer to this case to.

Sincerely

Alki David

According to [Isabel Ann Peterman](#), Financial Controller, Filmon TV

UK Group:

“Filmon had two accounts with PayPal 1) sales@filmon.com (old accounts,

used for over 10 years) and onlinesales@filmon.com (new opened in Jan 21

as a result of suspending the old one)

They were closed with explanation “in breach of user agreement”, consequently all funds held there were deducted and no specific reasons were provided of the cases of violation PayPal was using as an argument. Filmon lost half of its customers as a result.

a) Some PayPal stats:

- PayPal was the preferred choice of payment for our Filmon customers.
- In the last year (2020) there were a total of 61959 orders placed successfully via Paypal with an estimated value converted in GBP of £1.2m.
- Since Feb 1, 2021 when PayPal took down our account, the total amount of canceled PayPal subscriptions (users finally gone) was 5,415 (equivalent to lost sales orders per **month**)

The total amount of expected and not received incomes in 2021 because of canceled subscriptions based on 2020's sales rate is £1.3m, without embedding any possible further lost opportunities due to company marketing efforts etc.

b) Enclosing a file of customer complaint cases. (Theses are most representative cases. There were higher number or complaints in general but in some of them. the customers did not specifically mention PayPal, so they were excluded).

c) List of canceled PayPal subscriptions (file name "r2.xls") with encrypted emails for data protection purposes as a backup.

**Note: Ms. Peterman provided a table demonstrating the amount of monies that PayPal still has in segregated funds, stating the value of those funds in USD, EU, and BGB - pounds. I could not copy that table from her email so I am asking her to send it as an attachment and I will insert it as soon as I hear from her.**

### **Fifth Cause of Action Interference with Prospective Contract Relations**

Plaintiff David and the Entity Plaintiffs restate paragraphs 1 through XXXX of this Complaint,

**The Prospective Contract Relations consist of the thwarted IPO's. Alki - we need to go through each contract that each company had and we must meet these elements:**

**We must be very specific as to these elements:**

Plaintiff David and the Entity Plaintiffs (**which ones?**) claims that [name of defendant] intentionally interfered with an economic relationship between [him/her/nonbinary pronoun/it] and [name of third party] that probably would have resulted in an economic benefit to [name of plaintiff]. To establish this claim, [name of plaintiff] **Plaintiffs must prove all of the following:**

1. That [name of plaintiff] and [name of third party] were in an economic relationship that probably would have resulted in an economic benefit to [name of plaintiff];
2. That [name of defendant] knew of the relationship;
3. That [name of defendant] engaged in [specify conduct determined by the court to be wrongful];
4. That by engaging in this conduct, [name of defendant] [intended to disrupt the relationship/ [or] knew that disruption of the relationship was certain or substantially certain to occur];
5. That the relationship was disrupted;
6. That [name of plaintiff] was harmed; and
7. That [name of defendant]'s conduct was a substantial factor in causing [name of plaintiff]'s harm.

New September 2003; Revised June 2013, December 2013

Directions for Use

**Sixth Cause of Action**  
**Intentional Infliction of Emotional Distress<sup>9</sup>**

Plaintiff David and the Entity Plaintiffs restate paragraphs 1 through XXXX

of this Complaint,

<https://www.justia.com/trials-litigation/docs/caci/1600/1600>

The Attorney Defendants and the Litigating Defendants intentionally inflicted emotional distress upon Plaintiff David by:

**Press Conferences - Allred & Bloom**

Alleging that Alki committed rape - Girardi stated that and also Bloom stated that - details and particulars need to be specific

The Defendant Attorneys coaching the Litigating Defendants to conspire against Alki and the Plaintiff Entities and seek to extort settlement monies - add details with specificity and state with specificity how that caused Alki emotional

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**<sup>9</sup> Negligent infliction of emotional distress -**

**Note** - in California to prove negligent infliction of emotional distress, there must be a special relationship between the Plaintiff seeking the award and the Defendant causing the emotional distress.

**REFERENCE:**

<https://www.justia.com/trials-litigation/docs/caci/1600/1600>.

<https://www.justia.com/trials-litigation/docs/caci/1600/1620>

Accordingly, I recommend that we just sue for Intentional Infliction of Emotional Distress unless Alki can establish a special relationship between him and one or more of the Defendants.

harm.

In addition to the expense of defending Defendant Attorneys' and Litigating Defendants' spurious lawsuits, incurring a total amount of \$\_\_\_\_\_ in attorneys' fees and costs, the time required to defend against those actions resulted in lost business opportunities costing Plaintiff David and the Plaintiff Entities a total amount of \$\_\_\_\_\_.

Subsequently, Defendant Allred and her client, Mahim Kahn, attempted to file criminal charges against Plaintiff David, but, upon information and belief, were told by Beverly Hills police that they lacked the necessary evidence to support such allegations. Upon information and belief, Defendant Allred called a news conference at the Beverly Hills police station on the date she attempted to file criminal charges against Plaintiff David with the express purpose of intimidating, harassing and defaming Plaintiff David. Defendant Allred's actions in calling the press conference **and what other of her actions** have caused emotional harm to Defendant David. **INSERT PRESS RELEASE AND**

#### **VIDEO RE: ALLRED AND KHAN - BH POLICE**

No such criminal charges were ever filed. Nevertheless, upon information and belief, Defendant Allred arranged to have a false article published in the LA Times. [Self-appointed ambassador for 'wronged men' of #MeToo Alki David faces criminal complaint - Los Angeles Times \(latimes.com\)](#)

Despite repeated requests that the LA Times retract the article, it still

exists, documenting how Allred manipulated the media to further defame Plaintiff David.

Lisa Bloom called Alki a rapist - uttered that defamatory comment to David Haigh - insert his affidavit.

Plaintiff David's counsel has informed the court in one of the many spurious lawsuits urged against him that his mental health is in a downward spiral.

<https://www.courthousenews.com/coke-bottling-heirs-mental-health-in-downward-spiral-lawyer-says>

Is there emotional harm to anyone else? Family members? Business associates?

### **Seventh Cause of Action Defamation Of Alki David**

#### **PICK UP**

Bloom defamed in court by saying Plaintiff David pretending to be inappropriately touched by Plaintiff David during trial - the second time the Jury recognized Bloom's actions as inappropriate - Elizabeth Taylor - and the jury voted 8-4 in Plaintiff's favor, believing there was a fraud on the Court and that Taylor and her mother misled the Court.

Goldberg and Gloria Allred defamed in *Khan* and *Reeves* saying in trial that David - aspersions had been found guilty of wrongdoing by the SEC fraud trial with SEC. as well as re: press conference as well in trial - used over and over that Plaintiff David and had committed a crime in St. Kitts - convicted of transporting marijuana - LINK not true - misdemeanor CAN WE SHOW

Said David Didn't want to represent himself - in trial - refer to State Bar complaint.

Chastity Jones -has been on TV in afternoon TV shows - **link Allred excerpts**  
Mahim Khan and Lauren Reeves have defamed in Switzerland - repeat

### **Eighth Cause of Action** **Corporate Defamation Against WHAT PLAINTIFF ENTITIES?**

#### **DAMAGES**

Plaintiffs have sustained damages in an amount to be determined at trial, including loss of prospective business relations, the cessation of ongoing business relations, **CAN ALKI CLAIM (AND PROVE) THE SEC SETTLEMENT OF 100 k is directly attributable to Defendants' actions?**

<https://sec.report/CIK/0001656589>

[Ylena Calendar - has damage information as do accountants.](#)

**Alki needs to expand here:** Defendants (Allred? Bloom? Both?) filed lawsuits alleging numerous spurious counts, only to retract the claims as trial approached. **We need specifics here.**

Pulled on the day of filing - SEC - Gloria Allred, Lisa Bloom. Call witnesses like Gary Shoefield and Peter VanPruissen and he slayed CFO officer of the FilmOn - they would write up all the people make them as their witnesses

Chastity Jones - \$11 million reduced by \$445,000 by Judge Rafael Ongkeko - her out of pocket damages were excessive.

Mahim Kahn, a former production assistant for David's media companies, including FilmOn TV and Alki David Productions, Inc., consisting of \$8.25 million in compensatory damages and \$50 million in punitive damages. Khan was fired in October 2014 and quit about a year later awarded \$58.25 million for sexual battery

Subsequently, Defendant Allred and her client, Mahim Kahn, attempted to file criminal charges against Plaintiff David, but, upon information and belief, were told by Beverly Hills police that they lacked the necessary evidence to

support such allegations. Upon information and belief, Defendant Allred called a news conference at the Beverly Hills police station on the date she attempted to file criminal charges against Plaintiff David with the express purpose of intimidating, harassing and defaming Plaintiff David.

No such criminal charges were ever filed. Nevertheless, upon information and belief, Defendant Allred arranged to have a false article published in the LA Times. [Self-appointed ambassador for 'wronged men' of #MeToo Alki David faces criminal complaint - Los Angeles Times \(latimes.com\)](https://www.latimes.com/local/la-me-04-11-2017-self-appointed-ambassador-for-wronged-men-of-me-too-20170411-story.html)

Indeed, no criminal charges have ever been filed against Plaintiff David in any jurisdiction. **Other than the St. Kitts thing.**

### **Extortion**

**Title 18 U.S.C. Section 875(d) also criminalizes the conduct engaged in by Defendants Girardi, Allred, Bloom and their employees and agents. That statute provides as follows:**

**Whoever, with the intent to extort from any person, firm . . . or corporation, any money or other thing of value, transmits in interstate . . . commerce any communication containing any threat to injure the property or reputation of the addressee or of another . . . or any threat to accuse the addressee or any other person of a crime, shall be fined under this title or imprisoned or imprisoned not more than two years, or both.**

**Defendants Girardi, Allred and Bloom made threats intended to cause economic harm to Plaintiff David and to the Entity Plaintiffs and were intended to extort settlements. The threats were intended to cause reputational harm to Plaintiff David - those threats were wrongful because Defendants Girardi, Allred and Bloom used the threats and maligned Plaintiff David's reputation to try to obtain**

property to which they were not entitled.

**Defendants Girardi, Allred and Bloom are guilty of extortion because they sought money or property to which they did not have, and could not reasonably believe they had, a claim or right. Plaintiff Alki, accompanied by his then attorney Barry Rothman went to the DA and reported Elizabeth Taylor and Mahim Kahn for trying to extort me by demanding \$ 2.2 Million dollars**

**Plaintiff David and the Entity Plaintiffs suffered damages and incurred substantial losses as a result of Defendants Girardi, Allred, and Bloom's implementation and continuation of the extortionate claims.**

**WHEREFORE**, Plaintiff David and the Entity Plaintiffs pray that judgment be entered in their favor and against Defendants as follows.

Plaintiffs have sustained damages in an amount to be determined at trial, including loss of prospective business relations, the cessation of ongoing business relations, **CAN ALKI CLAIM (AND PROVE) THE SEC SETTLEMENT OF 100 k is directly attributable to Defendants' actions?**  
<https://sec.report/CIK/0001656589>

**IPO's interfered with - IPO's both stalled BOTH Hologram USA and FOTV Inc., a Delaware and current Public offerings on the NASDAQ marketplaces.** International Damage in an amount of at least \$600,000.

**Note:** Alki states that he spent more than \$100 million of his own money and reinvested many millions more from revenues in the companies - The audits of the IPO should help to prove those damages.

**As to the First Cause of Action**

**As to the Second Cause of Action**

**As to the Third Cause of Action**

**As to the Fourth Cause of Action**

**As to the Fifth Cause of Action**

**As to the Sixth Cause of Action**

**As to the Seventh Cause of Action**

Emotional health damages:

<https://www.courthousenews.com/coke-bottling-heirs-mental-health-in-downward-spiral-lawyer-says>

Pursuant to 18 U.S.C. Section 1964(c), Plaintiffs respectfully request their compensatory damages at the statutory rate of ten percent. Additionally pursuant to RICO, plaintiffs respectfully request an award treble the damages that Plaintiffs have sustained and the costs of the suit, including reasonable attorneys' fees.

Specifically, the Attorney Defendants filed unethical, spurious lawsuits against Plaintiff David without investigating the merits of those actions, unethically coaching their clients and witnesses about what to say, only to then often dismiss some of those complaints years later when trial proceedings were forthcoming. Further, the Defendant Attorneys conspired to tamper with

witnesses and to have witnesses collude against Defendant David and the Entity Plaintiffs by sharing the actions against Plaintiffs David and the Plaintiff Attorneys. Defendant Allred kept Defendant Mahim Kahn and Defendant Lauren Reeves as clients, but sent Defendant Elizabeth Taylor to Defendant Bloom, her daughter. After Defendants Reeves, Taylor and Jones conspired to sue Plaintiff David and the Entity Plaintiffs, Subsequently, Defendant Bloom was retained by Defendant Chastity Jones, all with an effort to extort money from Plaintiff David and the Plaintiff Entities.

In October, 2019, Judge Ongkeko of the Los Angeles Superior Court admonished Defendant Bloom for significantly overstating her already very expensive law firm bills submitted to the Judge when Jones won a compensatory award against Plaintiff David. Tellingly, the Judge said, “If I were a Bloom client - one that was actually paying out of pocket instead of these sad ambulance chasing contingency cases - I’d be very careful to go over the firm’s bills before I paid anything,” Judge Ongkeko said. Such over-billing and seeking to bilk Plaintiff David is just one of innumerable events demonstrating that Defendant Bloom extorted money from Plaintiff David and the Entity Plaintiffs.

Defendant Allred wrongfully sought to enforce a judgment against Plaintiff David *and his family*, none of whom were parties to any relevant

litigation filed by Defendant Attorneys, in Switzerland in *Mahim Kahn v. Alki David, et. al*, in violation of Swiss law. The Swiss courts rejected those efforts as appellate proceedings are ongoing in that case, causing Plaintiff David extreme expense and further damaging his reputation as such filings are public record.

Further, in *Lauren Reeves v. Alki David, et. al*, Defendant Allred again sought to enforce a judgment against Plaintiff David *and his family*, none of whom were parties to any relevant litigation filed by Defendant Attorneys.

In response, Plaintiff David filed criminal proceedings in Switzerland against Defendant Allred - append. Upon information and belief, the Swiss Court will impose???? can Swiss Counsel provide proper language summarizing their country's laws.

Defendant Allred's corrupt, wilful and intentional actions, constituting criminal acts under relevant Swiss law, were committed under the auspices of an otherwise legitimate enterprise, Allred, Maroko & Goldberg.

The Attorney Defendants' conspiring to extort and extorting money from Plaintiff David and the Attorney Defendants, and the Attorney Defendants tampering with witnesses, were actions committed under the auspices of otherwise legitimate enterprises as follows: Allred, Maroko & Goldberg, The Law Offices of Lisa Bloom; Girardi Keese; Dordick Law Corporation; Chora,

Young & Manasserian and The Law Offices of Ebby S. Bakhtiar.

Accordingly, Plaintiff David and the Entity Defendants sue all Attorney Defendants for injuries to Plaintiff David's and the Entity Plaintiffs' businesses and properties directly and proximately caused by reason of the Attorney Defendants' extortion, witness tampering, mail fraud and bribery, all of which constitute predicate claims pursuant to RICO.

Plaintiff David and the Plaintiff Entities have incurred unnecessary, onerous, and undue expenses, both in legal and expert costs, but also in lost profits and opportunities. Their actions also seriously damaged Plaintiff David's reputations.

**Plaintiffs demand a jury trial.**

INSERT signature page

INSERT certificate of service