

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; ABC individuals 1-25 inclusive; XYZ corporations 1-25, inclusive; Does 1-25, inclusive. **Counsel: Decide whether to name Newsom/Bar**

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 over this action 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 enterprise, committed multiple

intentional torts in whole or in part in California, causing injury to Plaintiff David and to Plaintiff Entities.

The 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. Defendants 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, 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").

CHECK WITH EDELSON RE: GROUNDS 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.

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 in 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 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 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, 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 disbarring 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.

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 involves counts alleging that the Attorney Defendants, the Litigating Defendants and the Swiss Attorney Defendants (“All Defendants”) committed extortion, obstruction of justice, wire fraud, mail fraud, and bribery against Plaintiff David and the Entity Plaintiffs; and that Attorney Defendants Allred and Bloom committed and Litigating Defendants Khan and Reeves also committed defamation against Plaintiff David. This Complaint also alleges corporate defamation against FOTV, Inc. and its holding companies, Anakando and its holding companies, and 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, all alleged herein due to 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 a partner in The Bloom Firm; Goldstein, in his individual capacity, and as a partner in The Bloom Firm; The Bloom Firm; Attorney Defendant Girardi, in his individual capacity, as a partner in Girardi Keese, and as a member of his marital estate with Eriky Jane; 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). Plaintiff David is but one of many targets who were victimized by Defendants Allred and Bloom to further their conspiracy.

Other notable target defendants include Steve Wynn, who Defendant Bloom recently paid for his defamation claim against her. 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. Here, Bloom has accused Plaintiff David of rape, thereby defaming him. **Add other cases. Marciano, Edelson.**

This RICO Complaint is filed in a time witnessing the demise of the house of cards nefariously and corruptly constructed by Attorney Defendant Girardi, and the named US-Based Attorney Defendants who conspired with Girardi in decades-long criminal enterprises.

www.law360.com/articles/1349235/girardi-s-legacy-in-shambles-amid-shakespearean-scandal.

Such enterprises are commonly referred to as the Girardi Family Syndicate or The Girardi Syndicate and they conducted activities under the auspices of legitimate law firms. *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.

As of this filing, the criminal enterprises have been "outed" - it is now known that for decades, the US-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 after a thorough exercise of due diligence are so egregious that their existence defies all due process guarantees to which every American is entitled. It strains credulity that such actions by Defendant Attorneys would occur unfettered, even with the acquiescence of The California State Bar and, upon information and belief, 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.

Upon information and belief, the Allred-Bloom-Goldberg-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 were their criminal enterprise.

PICK UP This Complaint is also being filed as the pendulum regarding the laudatory “Me Too” movement - which is intended to protect women’s rights, but

has been grossly misused by many opportunistic plaintiffs - swings from being a basis for a tsunami of spurious lawsuits filed against Plaintiff David and the Entity Plaintiffs and similar defendants nationwide, 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 an illegal enterprise that employed calculated media campaigns, threats and intimidation, and abusive, fabricated litigious actions. Most notably, **X demanded \$350 million, . . . Yet, when Plaintiff David and his counsel reported X's conduct to the Attorney General - no response.**

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, both in the United

States and Switzerland, 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.

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 caused Plaintiff David’s and the Entity Plaintiffs’ injuries by committing extortion, obstruction of justice, wire fraud, mail fraud, bribery and aiding and abetting in furtherance of an illegal racketeering enterprise as set forth in this Complaint. That enterprise 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”) Defendants harassing and extorting Plaintiff David and the Entity Plaintiffs, causing Plaintiff David and the Plaintiff Entities 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.

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 and harassing him and The Entity Plaintiffs so as to extort money and property from Plaintiff David.

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 same, 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.

What is most concerning with regard to Defendants Attorney Allred and Bloom's nefarious and illegal behaviors is that their extortionate tactics are systemic and know no bounds, as evidenced by this Complaint. which establishes that no one of any renown is protected from their 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 Plaintiff David and the Entity Plaintiffs herein. 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 illegal criminal enterprise.

Culpable Persons

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, on behalf of his marital community with Erika Jones, and as a partner in Girardi Keese; Gary A. Dordick, in his individual capacity, and as a

partner in Dordick Law Corporation; 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; 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 an 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 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 consisted of extortion, wire fraud, mail fraud, bribery, and obstruction of justice (“RICO Predicate Offenses”). The criminal enterprises continue to violate the hereinstated RICO predicate offenses and thereby harm Plaintiff David and the Entity Plaintiffs.

Litigating Defendants Jane Doe, Mahim Khan, Elizabeth Taylor, Lauren

Reeves, 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, 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 immature

judgments against Plaintiff David, knowing that her case was on appeal, and thus not collectible in Switzerland. 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.

Enterprise Allegations

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

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.”

The Defendant United States-Based Attorneys’¹ prohibited acts were

¹ **Note to Counsel:** The Attorney Defendants’ and the Individual Defendants’ RICO violations 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.

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.

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

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 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.

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).

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. **Link Provided by Fred.** Further, as alleged in this Complaint, the collection efforts by Defendants Allred, Bloom, Chora and Swiss Attorney Defendants also are tainted with those Attorneys both attempting illegally to collect money and property from Plaintiff Defendant and the Entity Plaintiffs, but also tortiously defaming Plaintiff David in both the United Kingdom and Switzerland.

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 he and they 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 they have targeted many others, as more fully discussed herein.²



² **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 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, should we name him and his prior firm as a defendant or simply include reference to him in the complaint with regard to averments regarding the enterprise and continuous activity? However, 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

Monica D'Oofrio filed *D'Onofrio v. Alki David Productions Inc., FilmOn Com., Inc. and Alki David*, Case No. BC496165.³ 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 filed false claims against Plaintiff David and some of the Entity Plaintiffs.

Note to Counsel: 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. 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.

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 lawsuits. Former employees and their counsel deemed Plaintiff David to be their gravy train. 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

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<https://trellis.law/case/BC495165/MONICA-D-ONOFRIO-VS-ALKI-DAVID-PRODUCTIONS-INC-ET-AL?output=pdf>.

as thwarted IPO's for FilmOn and XXXXX.

Note: Yelena was CONTROLLER and she had a very strong grasp on finances and taxes

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 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, 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 predicate offenses of extortion, bribery, obstruction of justice, wire fraud and mail fraud solely because of each US 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 5related 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 FilmOn and Anakando **WHAT OTHER 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 Entity in furtherance of an enterprise specifically designed to enrich Attorney Defendants.

Alki - Please Insert Affidavit Malik Spellman as a dropbox link.
file:///C:/Users/alki.000/Downloads/Affidavit_Malik%20David%20SpellmanConspiracy.pdf

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

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 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.

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.

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, 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, 18 U.S.C. §2, all cognizable as RICO predicate acts pursuant to 18 U.S.C. §§ 1862(b)(c) and

(d). **ELLYN'S MEMO RE: [GOLDBERG SWITCHING EVIDENCE LISTS](#)**

https://drive.google.com/file/d/1eHbeCweR_uH-iF9UVMca9Zi93Elna9QQ/view?usp=sharing

18 Incredibly, Plaintiff seeks to exclude documents that were not withheld, willfully or
19 otherwise, *but were produced*, as evidenced by Bates numbers affixed at the time of production.¹
20 Specifically, on September 19, 2019 (more than 30 days prior to trial), after Plaintiff prevailed on
21 a motion to compel, Defendants produced documents responsive to Plaintiff’s requests that were
22 in Defendants’ possession, custody or control. Declaration of Ellyn S. Garofalo (“Garofalo
23 Decl.”), ¶ 2. The Bates numbers, applied prior to their September 19, 2019 production, are
24 plainly reflected in Plaintiff’s motion to exclude the produced documents. *Id.* ¶ 3.
25 _____
26 ¹ In contrast, Plaintiff affixed Bates numbers to documents that were not produced, but first
27 appeared on Plaintiff’s Exhibit List. Apparently, unfamiliar with the difference between Bates
28 stamps and Exhibit Nos., Plaintiff purportedly added Bates numbers to the documents as a
“convenience” at trial. In fact, the Bates stamps appear to have been added to deceive the Court
into believing the documents were actually produced during discovery.

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.

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

Note to Counsel: We have affidavits from Zimmerman and Ciara Menieffe.

We are getting statements from: 1) Carl Bowen; 2) Alli; 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 expects to receive approximately 40 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).

Upon information and belief, former employees who sued Plaintiff David (Litigating Defendants) often met at a restaurant near Plaintiff Entity Hologram, Inc.,'s location, 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.

Rizzo's Deposition and Trial Testimony in the Jones Case Demonstrates that Other Litigating Defendants Contrived Claims Against Plaintiff Defendant and the Litigating Defendants after the Rizzo Settlement with Plaintiff David and the Entity Plaintiffs

In the *Chastity Jones* case, Defendant Bloom deposed Mary Rizzo who

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/14lX-XfL3oOGUS9MV4-zd3GXt0WTE1g3M/view?usp=sharing>.

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

6 **5. Ms. Jones Was Untruthful and Dishonest in Her Trial Testimony**¹⁴

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

- 17 • At trial, Ms. Jones claimed that when she posted a picture of herself in her bathing suit on
 18 Instagram on Easter Sunday 2015, Mr. David came up to her the next day and said that he
 19 liked the picture she posted and that, “You need to post more pictures like that.” (Reporter’s
 20 Transcript, 362:2-19.) Ms. Jones testified that as a result of Mr. David’s comment she “was
 21 in shock,” “felt violated by [her] superior,” and “wanted to get away from [Mr. David].”
 22 (RT, 362:20-23) Ms. Jones testified that she “went immediately and told Mary Rizzo.” (RT,
 23 362:24-26.) Ms. Rizzo stated that she “was right next to [Ms. Jones] when [Mr. David]
 24 commented on [the picture]. She [Ms. Jones] posted it for [Mr. David], she [Ms. Jones] told
 25

26 ¹⁴ The information presented in sections 5 and 6 regarding Ms. Jones’ dishonesty in her trial testimony and
 27 Ms. Jones’ attorney bullying a witness punctuate the fact that there has been a miscarriage of justice with
 28 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 Menfee Decl., ¶ 16.)

23 In or around May 2019, Ms. Jones’ lawyers contacted Ms. Menfee through her then lawyer,
 24 David Osorio. (Menfee Decl., ¶ 10.) “With the help of Mr. Osorio, [Ms. Menfee] 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. Menfee] how much money Ms. Rizzo had received as a result of her settlement. [Ms.

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.

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?

Carl's affidavit will recount that Taylor was fired because of her failure to go to work at FilmOn or Hologram and she failed entirely to perform her duties. Upon information and belief, Taylor was not at work for FilmOn or Hologram because she was too busy wrestling at the Playboy Mansion.

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>.

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.

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.

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 Litigating Defendant Taylor was Attorney Bloom.

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.

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 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 soon-to-be-filed Petition for Review before the California Supreme Court **when Fred Heather sends that filing.**

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 Defendants Ebby S. Bakhtiar, Gary A. Dordick, and Thomas Vincent Girardi. This matter is still pending.

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) 387-2511

CASE/INCIDENT REPORT

SUPPLEMENTARY

CFS NO 1900022823	DAY 6	INCIDENT DATE 11/01/2019	TIME 14:18	DATE OF RPT 11/01/2019	TIME OF RPT 17:26	TYPE OF INCIDENT THREATENING	INCIDENT CD 026	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	TYPYST KAR0167	DATE TYPED 11/01/2019	TIME TYPED 17:26	
STREET NO 00016	STREET NAME AND TYPE BURMA Rd Woodbridge		APARTMENT NO/LOCATION	INTERSECTING STREET NAME AND TYPE			STATUS Closed	TOWN CD T167	
OFFENSE Informational	LOCAL X-REF CODE INF	IBR 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 - 1010	ADDRESS 16 Burma Rd Woodbridge CT	OP STATE & NO. CT 08794935		

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 [redacted] 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.				CERTIFIED POLICE DEPT 11-8-19	
INVESTIGATOR SIGNATURE: /OFC. Karl A Rodriguez-Perez/	INVESTIGATOR I.D.#: 014	SIGNED DATE: 11/02/2019	SUPERVISOR SIGNATURE /SGT. Michael R Blume/		SUPERVISOR I.D.#: 082

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.

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

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

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.

Not satisfied with extorting money from Plaintiff David, Bloom could not even control herself in the foyer of the Stanley Mosk Courthouse, a public building, where she screamed at Plaintiff David and accused him of rapes, fa



The image shows a YouTube video player interface. The video content is partially obscured by a large comment overlay on the right side. The video title is "ALKI DAVID ATTACKS THE CREW!!!! - Monica-D'Onofrio" and it has 4,080 views from November 8, 2012. The video player shows a man in sunglasses and a woman in a public building, a man on a phone, and a tennis court. The comment overlay contains the following text:

- SORRY**
- simkafay420: BOSS**
WASN'T IT LIKE KITTY OR SOMETHIN
- Woolwuff: POLICE**
IN CASE WE'RE INVADED
- MainLines**
HER NAME IS JOARDEN GHOSTDOG
- djgroovex:**
HAHA NP GHOST
- ghostdog:**
NO KITTY IS

At the bottom of the player, there are icons for like (15), dislike, share, download, and save.

[\(118\) ALKI DAVID ATTACKS THE CREW!!!! - Monica-D'Onofrio - YouTube](#)



6:11

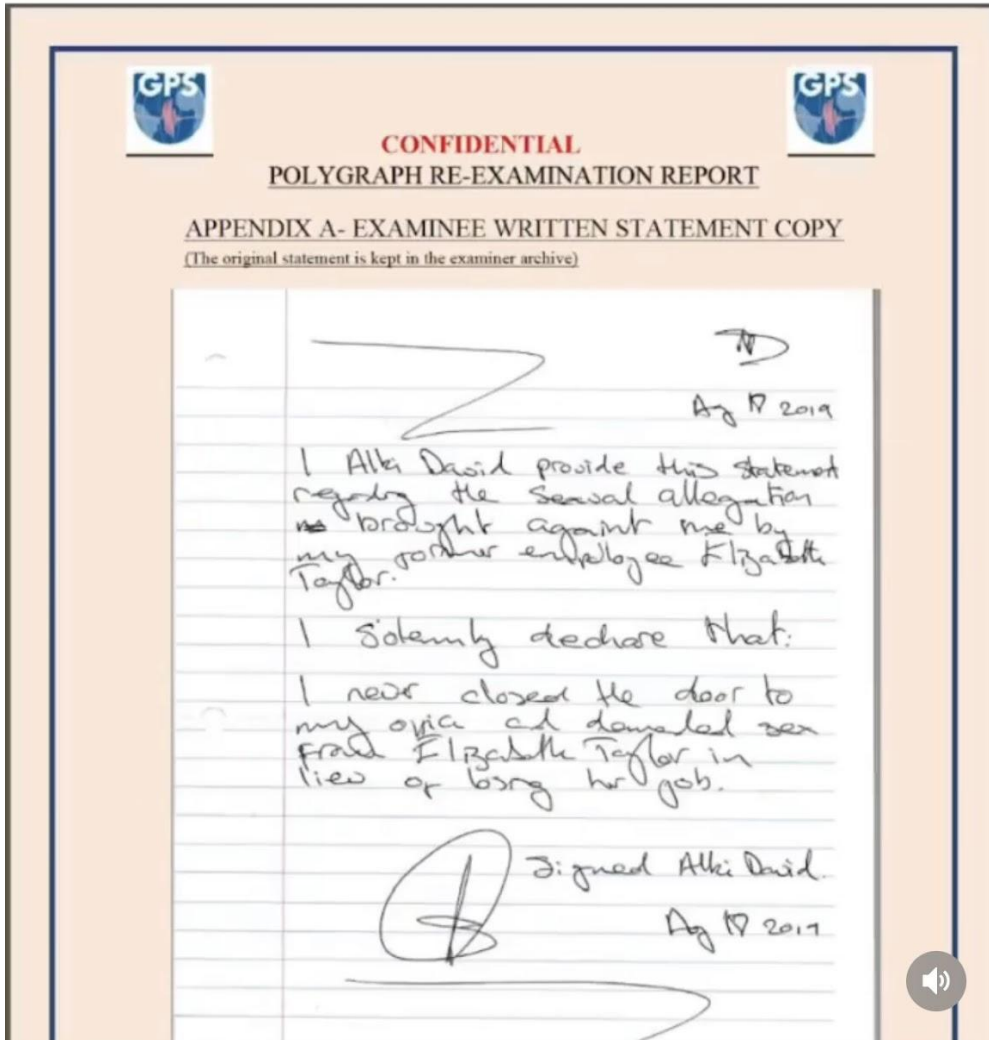


Ringer

September 21, 2019



alkidavid



View insights

Boost Post



42.898 views • Liked by bobbywilson22

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

(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 because the Mother's young daughter was hearing Bloom's defamatory accusations against Plaintiff David, as well at attorneys waiting for 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

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.⁴

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 Kahn v. Alki David, et. al*, in violation of Swiss law.⁵

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

⁴<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).

⁵https://docs.google.com/document/d/1Sq9smWheF_6yI_bNY1EPne1yxweAiO3zNX6_g4PiJg/edit (Letter from Plaintiff David's Swiss Counsel, December 16, 2021).

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.⁶

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.

⁶ <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

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' 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 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).

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 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

Upon Information and Belief, 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

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. Upon information and belief 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 \$8,000,000 in punitive damages **against Plaintiff David only.**

Upon information and belief, Defendant Chora followed inappropriate and unlawful collection procedures, both in the United States and in Switzerland 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 Dough matter Dordick and Bakhtiar - Jane Dough matt**

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 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).

Swiss Criminal Proceedings Demonstrate that Litigating Defendants Chasity Jones and Mahim Khan have Defamed Plaintiff Alki

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 Urteilstrettritts 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

Anwalts honorare 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 Eintritts

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.

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*),

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 14th 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 convinced 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 14th 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 19th 2021 and against Mahim KHAN on November 30th 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) :

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.*¹⁹⁷

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

« ¹ 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.

² 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.

³ 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).

Regarding your mandate for our common client, we would be glad if you could answer the following questions :

1. **Could you please explain us whether a judgment can be reviewed / reopened in California and under which conditions ?**
2. **More specifically, the civil judgements sentencing our client to punitive damages were based on fraudulent evidence – this issue was raised before the civil court but the fraudulent evidence nevertheless admitted to our client's prejudice. Being underlined that this evidence had, at the time, not yet lead to criminal proceedings, would it be possible to reopen the civil trial based on a diverging criminal verdict recognising the fraudulent character of said evidence?**

The same question would apply in case of newly discovered evidence during the criminal proceedings, which would have been relevant – if it had been discovered in the frame of the civil trial ?

- 3. Which judicial strategy would be the best in your opinion given the interests at stake ?**

- 4. As the case may be, would you accept to initiate such proceedings (depending on the possibilities) ?**

Finally, we would like to emphasise the fact that we remain at your entire disposal should you have any questions or whether you need further exhibits.

Yours sincerely,

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Regionalgericht Oberland **EINSCHREIBEN**

15. OKT. 2021

Postaufgabe: 14. 10. 21
Nr.

Regionalgericht Oberland
Verwaltungsgebäude Selve
Scheibenstrasse 11B
3600 Thun

EINGEGANGEN
05. Nov. 2021

021

Downloads/211014%20Attachment%20request%20Khan%20CIV%2021%202670.pdf

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A. Forderungen der Arrestgläubigerin

1. Mit Urteil vom 3. Februar 2021 (nachfolgend: « das Urteil ») verurteilte der Superior Court of the State of California Herrn Alkiviades 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 Alki David Productions, Inc., Filmon TV, Inc., and Alkiviades ("Alki") 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 Alkiviades ("Alki") 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 Alki David Productions, Inc., Filmon TV, Inc., and Alkiviades ("Alki") David, jointly and severally:

Attorneys' fees in the amount of **\$1,398,885**, 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 freier Übersetzung:

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

\$8'250'000 zuzüglich Zinsen in Höhe von zehn Prozent (10%) pro Jahr ab dem Datum des Urteilstretts am 21. Januar 2020 bis zur Zahlung;

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

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

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

CONFIDENTIAL
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
Tel: 424-302-2498
www.90210polygraph.com

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alkidavid @lisabloomesq see you in court tomorrow - what you see here is nothing compared to what's coming to you and your firm. Prepare for total humiliation.

127w

+

cj.ivix I had no idea who you were before the @hotboxinpodcast interview but dude you're my idol now 🤩

123w 2 likes Reply

1creatia Battlecam returning??

123w Reply

41,594 views
AUGUST 18, 2019

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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?

Plaintiff David and the Entity Plaintiffs restate paragraphs 1 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 Defendants, and trying to force Plaintiff David and the Entity Defendants to settle the Litigating Defendants’ spurious claims.

Upon information and belief, **(Allie and Carl Affidavits provide this good faith basis)** 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 - 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:

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. 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 impeach 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

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

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.

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 *Elizabeth 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.

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 Ellyn 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.

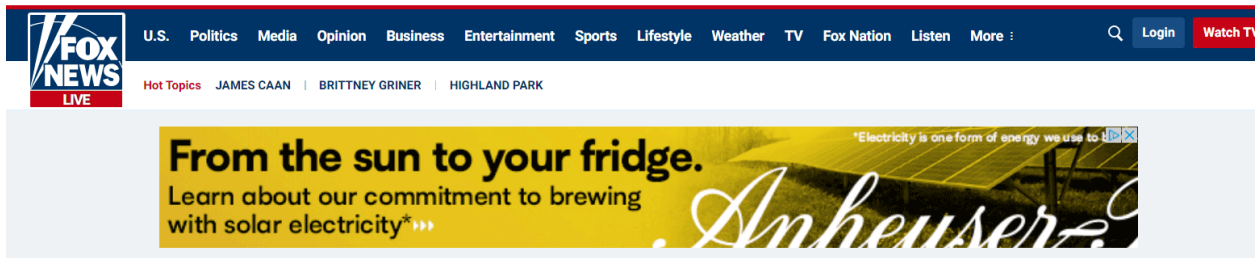
"The truth will come out," said Alki David. "This Judge, for whatever reason, does not want to see justice done in her own courtroom. It's not justice if a person can't defend themselves. This really should be a mistrial—but if I have

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.”

\$3.5 million here also 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.




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



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...

GLORIA ALLRED
 "I KNOW HIM
 40 YEARS
 BUT NOT HER!"
 HUH?
 2021

09 NEWS
 Famed Attorney Gloria Allred Admits She's 'Shocked' By Tom Girardi's Alleged Embezzlement Scheme: 'I Feel Sorry For Tom, But I Feel Sorrier For His Clients'



HOME TV
 'RHOBH: Erika Jayne and Tom Girardi Shocked,' Gloria Allred Admits
 BIG BOM

Famed attorney Gloria Allred said that [the Tom Girardi case shocked her](#) because she's known Girardi for decades. She recalled the last time she saw Girardi and added that she's seen other high-profile attorneys take a fall. While she doesn't know Erika Jayne from [The Real Housewives of Beverly Hills](#), she said the allegations against her

will be heavily scrutinized and investigated.



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CALIFORNIA FORM 461

Amendment

Statement covers period	Date of election if applicable: (Month, Day, Year)
from <u>07/01/2018</u>	
through <u>12/31/2018</u>	

1/3
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SEE INSTRUCTIONS ON REVERSE

1. Name and Address Of Filer

NAME OF FILER
(Include name(s) of all affiliated entities whose contributions are included in this statement.)
Thomas V. Girardi

MAILING ADDRESS (NO. AND STREET)

CITY STATE ZIP CODE
Los Angeles CA 90017

RESPONSIBLE OFFICER (If filer is other than an individual)
Thomas V. Girardi

AREA CODE/DAYTIME PHONE

2. Nature and Interests of Filer (Complete each applicable section.)

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

NAME OF EMPLOYER/BUSINESS Girardi & Keese	BUSINESS INTERESTS Law Firm
ADDRESS OF EMPLOYER/BUSINESS Los Angeles CA 90017	

3. Summary

(Amounts may be rounded to whole dollars.)

1. Expenditures and contributions (including loans) of \$100 or more made this period. (Part 5.)	\$ 34200.00
2. Unitemized expenditures and contributions (including loans) under \$100 made this period.	\$ 0.00
3. Total expenditures and contributions made this period. (Add Lines 1 + 2.)	SUBTOTAL \$ 34200.00
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.)	\$ 43000.00
5. Total expenditures and contributions (including loans) made since January 1 of the current calendar year. (Add Lines 3 + 4.)	TOTAL \$ 77200.00

The Enterprise and Conspiracy Against Plaintiffs Begins . . . And Continues

Plaintiff David first met Defendants Allred and Bloom when they appeared on the Dr. Phil show on December 4, 2012. Upon information and belief, from that day forward, Defendants Allred and Bloom viewed Plaintiff David. **When did Alki meet Thomas V. Girardi - Alki recalls socially but is trying to tie down dates?**⁷

⁷ **Note:** Due to a provision in California's professional code, disciplinary proceedings against Girardi are in abeyance as his license is inactive because he has been placed in conservatorship. He is not eligible to practice law as he is scheduled for disbarment 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 messy

Monica D'Oofrio filed *D'Onofrio v. Alki David Productions Inc., FilmOn Com., Inc. and Alki David*, Case No. BC496165.⁸ on November 6, 2012, alleging employment discrimination. Plaintiff David settled the case for a minimal amount and the case was dismissed in 2013.

Thus, began a long series of spurious suits filed by Defendant Attorneys against Plaintiff David. Upon information and belief, with the urging of Defendant Attorneys, various employees and ex-employees filed false claims against Plaintiff David and some of the Entity Plaintiffs.

Note to Counsel: Alli's affidavit will establish that she saw

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, should we name him and his prior firm as a defendant or simply include reference to him in the complaint with regard to averments regarding the enterprise and continuous activity? However, Girardi's former partner Keith Griffin, has joined the Dordick Law Firm, whose principal is Defendant Gary A. Dordick.

8

<https://trellis.law/case/BC495165/MONICA-D-ONOFRIO-VS-ALKI-DAVID-PRODUCTIONS-INC-ET-AL?output=pdf>.

other Plaintiffs contrive claims by constantly entering Plaintiff David's office in hopes of enticing him to commit offensive conduct. The former employees, encouraged and aided and abetted by the Defendant Attorneys, targeted Plaintiff David as a victim to name in spurious lawsuits. Former employees and their counsel deemed Plaintiff David to be their gravy train. 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 as thwarted IPO's (name).

A Parade of Spurious, Defamatory Lawsuits, Extortion, Obstruction of Justice and Witness Tampering

Upon information and belief, Attorney Defendants Girardi, Allred and Bloom conspired to pursue vexatious litigation creating a continuous and related pattern of racketeering activity against Plaintiff David and the Entity Plaintiffs by filing numerous spurious and unfounded lawsuits against Plaintiff David and the Entity Plaintiffs.

The Attorney Defendants were enabled by one another and retained experts to assist in The Attorney Defendants' committing the predicate offenses of extortion, bribery, obstruction of justice, and mail fraud solely because of each Attorney Defendants' position in the enterprise and their involvement in or control over the enterprise's affairs and because their offenses of extortion, bribery, obstruction of justice and mail fraud 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 Plaintiffs FilmOn and Anakando and former employees of those Plaintiffs, to independently file tort lawsuits against Plaintiff David, alleging he committed sexual misconduct and/or that those Plaintiffs had viable employment law claims in order to extract and extort money from Plaintiff David and the Entity Plaintiffs in furtherance of an enterprise specifically designed to enrich Defendants.

Defendant Attorneys filed lawsuits on behalf of Litigating Defendants Elizabeth Taylor (represented by Defendant Attorney), 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 Attorney Defendant Allred) and Lauren Reeves (represented by).

Attorney Defendants Girardi, Allred, Goldberg, Goldstein, Leal, Mochkatel, Bloom, Fudalli, Chora, Warshavsky, Baker Hostetler,

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 money to settle with the parties who sued Plaintiff David and the Entity Plaintiffs.

FACTS COMMON TO ALL RICO ALLEGATIONS

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.



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 mail fraud, extortion, tampering with witnesses, including Defendant Goldberg's falsification of a signature in a civil proceeding, bribery, and aiding and abetting, 18 U.S.C. §2, all cognizable as RICO predicate acts pursuant to 18 U.S.C. §§ 1862(b)(c) and (d).

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, hoping to extract money and property from Plaintiff David. To succeed in their enterprise, the Initial Enterprise Defendants unethically coached their clients and witnesses about what to say so that they could file spurious lawsuits and/or make unreasonable and unfounded settlement demands against Plaintiff David and the Entity Plaintiffs.

CUT Defendant Attorneys' Illegal and Unethical Actions in Court Proceedings, Actions Committed on behalf of the Criminal Enterprise

On November 6, 2012, Monica D'Oofrio filed *D'Onofrio v. Alki David Productions Inc., FilmOn Com., Inc. and Alki David*, Case No. BC496165.⁹ On May 10, 2013, alleging employment discrimination. Plaintiff David settled the case for a minimal amount as nuisance value.

Thus, began a long series of spurious and harassing lawsuits filed

⁹

<https://trellis.law/case/BC495165/MONICA-D-ONOFRIO-VS-ALKI-DAVID-PRODUCTIONS-INC-ET-AL?output=pdf>.

by Defendant Attorneys against Plaintiff David and the Entity Plaintiffs, lawsuits that were part of an ongoing pattern employed by the Defendant Attorneys to extort money from Plaintiff David and the Entity Plaintiffs.

Upon information and belief, with the urging of Defendant Attorneys, various employees and ex-employees to file false claims against Plaintiff David and some of the Entity Plaintiffs.

Note: We have affidavits from Zimmerman and Ciara. Do we have sworn statements We are getting them from: 1) Carl Bowen; 2) Alli; and 3) David Haigh; 4) Peter Van Prusisenn; 5) Ylena Calendar; 6) Ian Robertson; 7)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.

Upon information and belief, former employees who sued Plaintiff David (Litigating Defendants) often met at a restaurant near Plaintiff Entity Hologram, Inc.,'s location, to collude 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.

Litigating Defendant Khan was the subject of the above 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.

The former employees, 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 pockets source of funding.

In filing this lawsuit - Plaintiff David and the Plaintiff Entities seeks justice to recoup millions of dollars, consisting of lost profits, improperly obtained court judgments, business IPO failures, and Plaintiff David experiencing undue emotional distress attributable to the wrongful actions of the Attorney Defendants and the Litigating Defendants.

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. **Carl affidavit Taylor was fired because of her failure to go to work at FilmOn or Hologram and she failed entirely to perform her duties.**

The 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. Counsel representing Litigating Defendant Jones were Attorney Defendants Bloom, Sarah Bloom of the Bloom Firm, and Attorney Defendants Fundali, Goldstein of the Bloom Law Firm and Attorney Defendant Chora.

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 Litigating Defendant Taylor was Attorney Bloom.

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.*, Case No. BC684618, in Department 57 of the Los Angeles County Superior Court, located at 111 North Hill

Street, Los Angeles, California 90012. 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-fucktard-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.

Hologram USA's independent contractor Grant Zimmerman filed *Grant Zimmerman v. Alkiviades David, et al.*, Case No. BC675552, in Department 71 of 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. 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 2019, Lauren Reeves, represented by Attorney Defendant Allred and her partners, sued Plaintiff David and Plaintiffs

Hologram USA and Alki David Productions, LASC Case No. BC649025 in the Superior Court of California, Los Angeles Division, 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., obtained an award of \$58 million for battery, sexual battery and sexual harassment against Plaintiff Alki David. Khan named Entity Plaintiffs Alki David Productions, Hologram USA, FilmOn Inc., and Plaintiff David. LASC Case No. BC654017 (2019). 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 soon-to-be-filed

Petition for Review before the California Supreme Court **when Fred Heather sends that filing. INSERT CASE NUMBER -**

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 Defendants Ebby S. Bakhtiar, Gary A. Dordick, and Thomas Vincent Girardi.

Insert Text Messages from Rita. This matter is still pending.

Attorney Defendant Bloom's Egregious Conduct in the Taylor Matter

Note: Counsel will need the transcript of this:

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.

Add: The video with Bloom’s allegations in the foyer of the Stanley Mosk Courthouse saying that Alki David committed Rape.

**DEFENDANT ALLRED EXCEEDED THE BOUNDARIES OF
ADVOCACY**

Throughout the entire, years-long campaign to obliterate Plaintiff Alki’s reputation and bankrupt his 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 the United Kingdom - **specify.**

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.¹⁰

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 Kahn v. Alki David, et. al*, in violation of Swiss

¹⁰<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).

law.¹¹

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 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.

¹¹https://docs.google.com/document/d/1Sq9smWheF_6yI_bNY1EPne1yxweAiO3zNX6_g4PiJg/edit (Letter from Plaintiff David's Swiss Counsel, December 16, 2021).

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 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.¹²

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

¹² <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>.

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.** This is one in a voluminous number of Allred's nefarious, harassing and extorting actions against Plaintiff David.

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 Defendant 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).

EXTORTION

Title 18 U.S.C. Section 875(d) criminalizes the conduct engaged in by Defendants Girardi, Allred, Bloom, Goldberg and **WHAT OTHER ATTORNEY DEFENDANTS CAN WE NAME IN THIS COUNT** 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. 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 Alki, accompanied by his then attorney Barry Rothman, went to the District Attorney in Los Angeles and reported Elizabeth Taylor and Mahim Khan for trying to extort Plaintiff David by demanding \$ 3.5 Million dollars. **Pull Emails Barry - UPLOADING ON JULY 3. INSERT**

INSERT

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. (These 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.

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, predicate claims pursuant to RICO Move: 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, tampering with witnesses, 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.

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 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.

EXTORTION

Title 18 U.S.C. Section 875(d) 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 District Attorney in Los Angeles and reported Elizabeth Taylor and Mahim Khan for trying to extort Plaintiff David by demanding \$ 3.5 Million dollars. **Pull Emails Barry - UPLOADING ON JULY 12-12. Does Fred have these emails perchance?**

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 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 from Plaintiff David and the Attorney Defendants, and the Attorney Defendants tampering with witnesses by telling them what to say, and Defendant Goldberg erring with regard to the introduction of documents and exhibits, and Defendant Goldberg falsifying the signature of Plaintiff's Counsel Ellyn Garofalo, 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.

Defendant Attorneys' Illegal Patterns of Defrauding Plaintiffs, Obstructing Justice and Soliciting Bribery

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, who were, and continue to be, victimized by Attorney Defendants' continuous pattern of racketeering conducted to benefit their enterprise, including mail fraud, extortion, tampering with witnesses, obstruction of justice, 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.

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.

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.

As to Defendant Allred, this 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 \(forbes.com\)*](#). Allred's behavior in this case parallels her long standing pattern of criminal enterprise:

<http://www.tvmix.com/jane-roe-admission-that-attorney-gloria-allred-paid-her-to-lie-resurfaces-after-sctus-overturns-roe-v-wade/123>.



Allred and Bloom are predators of predators - Phillymag

Fraud on the court - in taxes in Chastity Jones - even offered to give them the carcasses of the companies they destroyed - I offered FilmOn to Chora - yet, Allred and Bloom insist that Plaintiff is a billionaire, as does Chora.

Recommended letter
Ministère public du canton de Genève Monsieur Olivier JORNOT
Procureur général
Case postale 3565

1211 Genève 3 Gstaad,

December 16th 2021

Concerning : Criminal complaint of Alkiviades DAVID against Mahim KHAN ; American judicial system;
information concerning punitive damages; Criminal complaint in original version

Dear Attorney General,

You know that I represent the interests of Mr Alkiviades DAVID.

This letter is in response to the criminal complaint filed by my principal against Mrs. Mahim KHAN on November 30th, 2021 (hereinafter "the Complaint").

In order to better circumscribe the context of the facts presented in the Complaint, my client wishes to highlight a few particularities inherent in the functioning of the American judicial system.

First of all, it is common in the United States for a party to claim damages, especially punitive damages.

In this context and by way of introduction, it appears that the American lawyers of Mrs. Mahim KHAN are specialised in building up cases with a view to obtaining damages in favour of their clientele, in particular in civil, labour law and sexual harassment cases (cf. all. n° 23 to 25 and 33 of the Complaint) (cf. exhibits n° 7 to 9 of the Complaint).

Indeed, according to the GLOBAL ARBITRATION REVIEW (cf. article n° 1, page no. 4), punitive damages - prohibited by Swiss public policy - are widely available and may be awarded in commercial and contractual cases (« Under US law, punitive damages are widely available and may be awarded in commercial and contractual cases. »).

It is noted in this respect that, as illustrated in the Complaint (cf. incl. all. n° 26 to 31 of the Complaint), it is not a judge who decides on the award of compensation, including punitive damages, but a popular jury. In other words, the judge does not decide on the law, so that the award of punitive damages, which frequently reach unreasonable sums as will be shown below, depends solely on the permeability of the jury, which is made up of citizens chosen by lot, i.e. without any legal training whatsoever, and which can be easily manipulated, particularly by an attorney who is well versed in oratory.

The Supreme Court has repeatedly struck down excessive punitive damages awards as arbitrary deprivations of property without due process of law (cf. article n° 2, page n° 1, article published in FORBES on 8 April 2021).

The problems with the US Supreme Court's requirement of due process in lower courts, including their lack of fairness and consistency, have increased in recent years. Indeed, lower courts have been reluctant to comply with the US Supreme Court's jurisprudence on punitive damages, as they have continued to award excessive punitive damages (« ... Since then, the due process defects identified by the Court - such as lack of fairness, a lack of consistency, and cumulative punishment - have only increased in severity. These changes are fueled by an increase in the size of mass tort actions, coupled

with many courts' reluctance to rein in constitutionally excessive punitive damages awards. Indeed, many circuit and state courts have all but ignored the Court's admonition that, when the compensatory damages award is "substantial", the punitive damages award should be no greater ») (cf. article n° 2, page n° 2).

From the above, it is clear that punitive damages are relatively easy to obtain in the United States. There is a twofold aspect to this : the ease with which the American legal system makes it possible to obtain damages, especially punitive damages, has the perverse effect of encouraging individuals to take legal action, or even to construct a legal action from scratch, thanks in particular to the help of law firms that specialise in obtaining damages for their clients.

With regard to the collaboration of several attorneys in the establishment of this pernicious judicial system, we note that contrary to the regime prevailing in Switzerland (art. 12 let. e LLCA), the pactum de quota litis is authorised in the United States, so that it is perfectly possible, as it is often the case, for an attorney to agree not to receive a retainer or fees but to be remunerated solely on the basis of the outcome of the proceedings, receiving a percentage which in principle varies between 30 and 40% in the event of success (cf. article n° 3, page n° 2), which is obviously also an incentive for attorneys, who, so to speak, "participate in this system".

The above argument is all the more true with regard to the State of California, i.e. the State in which the American judgment was rendered and on which Mrs Mahim KHAN based her application for sequestration dated 14 October 2021 (cf. exhibits n° 6 and n° 10 of the Complaint).

In addition to excessive punitive damages awards being an issue in California, according to MG+M (cf. article n° 4, page n° 3) (« In addition to excessive punitive damages awards being an issue in California, ... »). Moreover, a continuing issue across the country is multiple lawsuits seeking punitive damages for the same tortious conduct (« ..., a continuing issue across the country is multiple lawsuits seeking punitive damages for the same tortious conduct. »), which demonstrates that there is an unhealthy, and legally dubious, tendency to chase punitive damages in the United States.

MG + M (cf. article n° 4, page no. 1) also notes that punitive damages have a punitive function for the conduct of the perpetrator on the one hand and a deterrent function for the perpetrator in the future on the other. Nevertheless, the award of punitive damages sometimes exceeds these two objectives and constitutes a violation of the 14th Amendment of the US Constitution and its Fair Trial Clause which prohibits grossly excessive or arbitrary punishment (« Punitive damages are meant to serve two purposes: punish the defendant for the conduct at issue in the lawsuit and deter similar conduct in the future. But, sometimes a punitive damages award goes beyond serving these two purposes and moves into the territory of violating the Due Process Clause of 14th Amendment to the United States Constitution. The 14th Amendment, through the Due Process Clause, prohibits the imposition of grossly excessive or arbitrary punishments »).

In addition, and still with regard to the State of California, it has legislated on the subject of punitive damages by requiring clear and convincing evidence without, however, specifying the notion (« Punitive damages are allowed in California ... which states "In an action for the breach of an obligation is proven by clear and convincing evidence ..." ... Although California does not define "clear and convincing evidence" ... ») (cf. article n° 4, page n° 1), which, along with the other factors mentioned above, contributes to the numerous abuses observed in this State in the award of such punitive damages.

In view of the above, the American judicial system, and especially California's, is a gigantic theatre where

individuals can be awarded absolutely unreasonable compensation by a popular jury in proceedings where legal and judicial requirements, particularly those relating to a fair trial, are sometimes sacrificed on the altar of the plaintiffs' greed.

We note that the #MeToo movement is unfortunately not helping this trend. Indeed, while it is true that this movement allows victims to speak out and to shed light on acts of harassment that have actually been committed, which is a happy outcome, we must also acknowledge that it is unfortunately a source of inspiration, a springboard, for some unscrupulous women to falsely claim to be victims of harassment in order to obtain a sum that will exempt them from working for the rest of their lives.

In this context, it must be said that the media coverage that some of them receive, by attacking well-known personalities, only serves to unduly strengthen their claims, through public opinion which is almost always sympathetic to their cause without having had any access to the elements of the case, in particular to possible evidence.

Finally, the original version of the criminal complaint, signed by my client, is attached.

Thanking you in advance for the action you will take on this matter, I would like to assure you, Mr Prosecutor General, of my respectful consideration.

Exct Béatrice STAHEL

Arthur SEPPEY

Attached : ment.

CORPORATE DEFAMATION

ELEMENTS

- 1. A false statement was made about the business,**
- 2. The statement was communicated or published to a third party,**
- 3. The statement was made with at least a negligible level of intent, and**
- 4. The statement caused damage to the business's reputation.**

Defamation -

Not satisfied with extorting money from Plaintiff David, Bloom could not

even control herself in the foyer of the Stanley Mosk Courthouse, a public building, where she screamed at Plaintiff David and accused him of rape, a false and defamatory allegation. <https://www.youtube.com/watch?v=QvCshThAnTQ>

(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 because the Mother's young daughter was hearing Bloom's defamatory accusations against Plaintiff David).

Alki

Add: The video with Bloom's allegations in the foyer of the Stanley Mosk Courthouse saying that Alki David committed Rape.
<https://www.youtube.com/watch?v=QvCshThAnTQ>

At 1:45 p.m.

DEFAMATION AGAINST PLAINTIFF DAVID

Allred concedes Plaintiff David had no criminal charges, let alone convictions here;

<https://www.youtube.com/watch?v=yT1ZReqJCDO&t=752s>

Yet, she was perfectly comfortable in defaming him here:

- 1. Bloom called Plaintiff David a rapist - to David Haigh - affidavit**
- 2. Allred called Plaintiff David a rapist - Marguerita Nichols and referred her to Tom Girardi. Same day after just met with David Haigh - in her complaint to Switzerland**
- 3. Swiss counsel - Mahim Kahn had swiss counsel and so did Lauren Reeves and in seeking to lien the David Family's Swiss assets, they claimed that Plaintiff David committed sexual misconduct, Thus drawing Plaintiff David's criminal complaints.**

Upon information and belief, Plaintiff David and the Entity Plaintiffs assert that Defendant Allred, conspiring with the other Attorney Defendants, including Goldberg, insert carry on with their criminal enterprise, coaching claimants to lie and mischaracterize their interactions with Plaintiff David and file spurious lawsuits against Plaintiff David and the Entity Plaintiffs in order to deprive the plaintiffs

of their property.

Moreover, the settlement agreement in *D'Onofrio v. Alki David Productions Inc., FilmOn Com., Inc. and Alki David*, Case No. BC496165 contained a confidentiality provision and Defendant Goldberg wrongfully divulged the confidential settlement's provisions.

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.

BRIBERY

18 U.S.C. §201(b)(3) states that whoever “directly or indirectly, corruptly gives, offers, or promises anything of value to any person, or offers or promises such person to give anything of value to any other person or entity, with intent to influence the testimony under oath or affirmation of such first-mentioned person as a witness upon a trial, hearing, or other proceeding, before any court, any committee of either House or both Houses of Congress, or any agency, commission, or officer authorized by the laws of the United States to hear evidence or

take testimony, or with intent to influence such person to absent himself therefrom.”

PICK UP AND ELABORATE Re: allegations

On November 6, 2012, Monica D’Oofrio filed *D’Onofrio v. Alki David Productions Inc., FilmOn Com., Inc. and Alki David*, Case No. BC496165.¹³ On May 10, 2013, alleging employment discrimination. Plaintiff David settled the case for a minimal amount as nuisance value.

Alki - D’Onofrio’s counsel was Gary A. Smith, Manuwal & Manuwal - please verify whether you want Mssr. Smith named as a party defendant?

Thus, began a long series of spurious and harassing lawsuits filed by Defendant Attorneys against Plaintiff David and the Entity Plaintiffs that were part of an ongoing pattern employed by the Defendant Attorney, their Clients and Experts to extort money from Plaintiff David and the Entity Plaintiffs.

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

¹³

<https://trellis.law/case/BC495165/MONICA-D-ONOFRIO-VS-ALKI-DAVID-PRODUCTIONS-INC-ET-AL?output=pdf>.

Affidavits needed: REQUESTED FROM DANA COLE

Note to Counsel: Allie's affidavit establishes that she saw other Plaintiffs contrive claims by constantly entering Plaintiff David's office in hopes of enticing him to commit offensive conduct.

Upon information and belief, former employees who sued Plaintiff David (Litigating Defendants) often met at a restaurant near Plaintiff Entity Hologram, Inc.,'s location, to collude 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 former employees, encouraged and aided and abetted by the Defendant Attorneys, targeted Plaintiff David as a victim to name in spurious lawsuits. Former employees and their counsel deemed Plaintiff David to be their gravy train. In filing this lawsuit - Plaintiff David and the Plaintiff Entities seeks justice to recoup millions of dollars, consisting of lost profits, improperly

obtained court judgments.

On February 2, 2017, Elizabeth Taylor and Chastity Jones filed a Labor-Wrongful Termination lawsuit in Los Angeles County Superior Court against Plaintiffs David, Hologram USA Inc., FilmOn TV. Inc. There is no truth to their allegations and, 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.

In April, 2019, Chastity Jones won an award against Plaintiff David for \$11 Million in compensatory damages, an amount that was reduced by \$437,120 by the court.

In October, 2019, a jury deadlocked 8-4 in Elizabeth Taylor's suit. Los Angeles County Superior Court Judge Christopher Lui declared a mistrial.

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, dropped the claim on the eve of trial.

BRIEF STATEMENT OF THE CASE

Karl Zirpel filed this lawsuit. He is called a plaintiff. He seeks damages and other relief from Alki David, who is called a defendant.

Karl Zirpel claims that Alki David subjected him to harassment and discrimination based upon his sexual orientation and violated wage and hour laws. Defendant denies those claims. Defendant also contends that Plaintiff caused Defendant financial harm, and if Plaintiff was terminated it was not for discriminatory reasons as claimed by Plaintiff.

Alki David has also filed what is called a cross complaint against Karl Zirpel. Alki David is a defendant, but also is called the cross-complainant. Karl Zirpel is called a cross-defendant.

In his cross-complaint, Alki David claims Karl Zirpel committed sexual battery and battery against Alki David. Karl Zirpel denies those claims.

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.

Note: Alki was previously involved in unrelated litigation over a business dispute with Barry Diller, whose company, IAC owns the Daily Beast.

In 2019, Lauren Reeves sued Plaintiff David and Plaintiffs Hologram USA and Alki David Productions for sexual battery and sexual harassment. Defendant Goldberg 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., obtained an award of \$58 million for battery, sexual battery and sexual harassment against Plaintiff Alki David. This matter is on appeal before the Supreme Court of California. **Link Petition for Review when Fred Heather sends that filing.**

On September 30, 2020, Jane Dough (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. in Los Angeles Superior Court, LASC No. 7498 - (we need the rest of the case number from Fred Heather). Plaintiff Doe's attorneys are Defendants Ebby S. Bakhtiar, Gary A. Dordick, Thomas Vincent Girardi. Plaintiff Alki is Fred D. Heather.

Mail Fraud

18 U.S.C. §§ 1341 and 1343 address the commission of the crime of mail fraud and wire fraud.

Plaintiffs allege that Gloria Allred, Esq., in her individual capacity, and as a principal in Allred, Maroko & Goldberg; Nathan Goldberg, Esq., in his individual capacity, and as a partner in Allred, Maroko & Goldberg; Delores Y. Leal, Esq., in her individual capacity and as a partner of Allred, Maroko & Goldberg; Renee Mochkatel, Esq., in her individual capacity and as a partner of Allred, Maroko & Goldberg; Lisa Bloom, Esq., in her individual capacity and as the owner of the Law Offices of Lisa Bloom; Law Offices of Lisa Bloom; Thomas V 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 and his capacity as a former partner in Girardi & Keese. 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; (Attorney Defendants), culpable persons capable of holding legal or beneficial interests in property, have participated in long-term, organized conduct of a criminal enterprise

affecting interstate and international commerce through an interrelated pattern of racketeering activity, in violation of RICO laws set forth in 18 U.S.C. §§1962 (b)(c)(d).

Utilizing the mails and wires, the Attorney Defendants participated in and have furthered their enterprise through a plan and a scheme to defraud that continues to this day and encompasses acts of artifice or deceit that were and are intended to deprive Plaintiff David and the Entity Plaintiffs of their property and money.

There was a reasonable foreseeability that, in perpetrating the mail fraud, the Attorney Defendants would and did utilize the mail or wires.

The Attorney Defendants' scheme to defraud included the use of the mails to communicate with witnesses, opposing counsel, and experts in actions intended to defraud Plaintiff David and the Entity Plaintiffs.

Plaintiff David and the Plaintiff Entities' prior counsel 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.¹⁴ Upon information and belief, Defendant

¹⁴

<https://mail-attachment.googleusercontent.com/attachment/u/0/?ui=2>

Attorneys in that case and the other lawsuits recounted in this Complaint all used the mail and wires to defraud Plaintiff David and the Entity Plaintiffs of their money and property so as to further the illegal enterprise.

Note to Counsel: We need to add more specificity here - can we prove through Swiss counsel that Gloria Allred in Switzerland and/or that Lisa Bloom in the UK utilized wires to perpetrate their fraud. Do emails suffice? Edelson Complaint thinks so -

As to Defendant Allred's pattern of using the mail to manipulate witnesses, and, upon information and belief, paying the witnesses to testify in a particular fashion, is a pattern of fraud, obstruction of justice and witness tampering that is more than fifty years old. In the landmark

https://www.fishbase.org/species/68ad5627e5&attid=0.1&permmsgid=msg-f:1581550983980536602&th=15f2cc3d9254531a&view=att&disp=safe&saddbat=ANGjdJ9-5bpRafrPc6mzVjKA3XI0-ayZU7civdXpsd83db8fANLjou0wH6gkHQitU6I6gIB2oTWBBW3QENef-uHEQi8uCtR1Q106GKiQb8tbarCdfhAFWgg8LVANTNjBJZXxG_e_Q5K1A8XJKB64JVy6sSB4rzkkOYY7AzKnZRG7jIIhW7bXi_EK8DHuWxf9H3W4q6iyThtqtJBxZwBdYxPWUZZDF2Vsm1Du3tU6RaeVn8ufRVXWamy_uUWhGy4kXh5FIi8MF8eud_NL8D0ar9SyjM5ea_nlukQ_Ouj2umUYkIza-_FELth5XIFPHuCRQgdWjYo99iaUX8N_U2VZMxcWK67W8DNcnwloh3FTheQqZSkSFac2raYoI7HFVL425j2jvqeTPLgkQBJTwcZA9ykbUM8Kp6xMcIJ969CgAdEJMmqzxnFQw4zYeJJhp9amLuII-qop28yDla8xy5ecquyB5FkqeKM8Vax3XdWZCtKZs4cA_XVf8HwXOpVk9_wGwh0P7hGJVy0pR3RBKb_T3WUN7Fxc-GPWIOfOpGZRnhhgH_NWsNR8Jo5rvrVxEpWM6S0-st_YhCrVHLp3xIE1zaIGXMmH6ly89w6yrnBWvcD6B1_7VIPVeipqhqd-Zc3-hHlnO7z45w1B9HhJQbE1j7_hTBRdMIYx7oV95ahboF1QE1osLCnltAf-Z0UIpvgXld7JqtlwpJjGDS-1DuNYyfYHCNDNnH3JTUJyaD4nVtOpBQkgYcfUh62uPjeTOgolbeQqBik19h4D7N5Zr_rilbG_aXiqHZzHo5miZxhrEL49AJ5R5gb5c3kGMUMqQNjWGPIsIm4PSkKa_L6Cpe_

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 \(forbes.com\)](#).

Upon information and belief, Plaintiff David and the Entity Plaintiffs assert that Attorney Defendants carry on with their criminal enterprise, using the mail and wires to coach claimants to lie and mischaracterize their interactions with Plaintiff David and to file spurious lawsuits against Plaintiff David and the Entity Plaintiffs in order to deprive the plaintiffs of their property.

Strategy Note: Fred has some of Barry Rothman's (deceased) files as I understand it so counsel needs to assess all correspondence and emails to bolster the mail and wire claim.

I note that, tellingly, Barry Rothman, sought to obtain Lauren Reeves' cell phone records to counter her claims against Plaintiff David. 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.¹⁵

IS THIS A DUPLICATE?

The Enterprise's Spurious, Defamatory Lawsuits, Extortion and Witness Tampering

Upon information and belief, Defendants Girardi, Allred and Bloom conspired to pursue vexatious litigation creating a continuous and related pattern of racketeering activity against Plaintiff David and the Entity Defendants by filing numerous spurious and unfounded

15

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&sadbat=ANGjdJ9-5bpRafrPc6mzVjKA3XI0-ayZU7civdXpsd83db8fANLjou0wH6gkHQitU6I6gIB2oTWBBW3QENef-uHEQi8uCtR1Q106GKiQb8tbarCdfhAFWgg8LVANTNjBJZXxG_e_Q5K1A8XJKB64JVy6sSB4rzkkOYY7AzKnZRG7jIIhW7bXi_EK8DHuWxf9H3W4q6iyThtqtJBxZwBdYxPWUZZDF2Vsm1Du3tU6RaeVn8ufRVXWamy_uUWhGy4kXh5FIi8MF8eud_NL8D0ar9SyjM5ea_nlukQ_Ouj2umUYkIza-_FELth5XIFPHuCRQgdWjYo99iaUX8N_U2VZMxcWK67W8DNcnwloh3FTheQqZSkSFac2raYoI7HFVL425j2jvqeTPLgkQBJTwcZA9ykbUM8Kp6xMcIJ969CgAdEJMmjzxnFQw4zYeJJhp9amLuII-qop28yDla8xy5ecquyB5FkqeKM8Vax3XdWZCtKZs4cA_XVf8HwXOpVk9_wGwh0P7hGJVy0pR3RBKb_T3WUN7Fxc-GPWIOfOpGZRnhhgH_NWsNR8Jo5rvrVxEpWM6S0-st_YhCrVHLp3xIE1zaIGXMmH6ly89w6yrnBWvcD6B1_7VIPVeipqhd-Zc3-hHlnO7z45w1B9HhJQbE1j7_hTBRdMIYx7oV95ahboF1QE1osLCnltAf-Z0UIpvgXld7JqtlwpJjGDS-1DuNYyfYHCNDNnH3JTUJyaD4nVtOpBQkgYcfUh62uPjeTOgolbeQqBik19h4D7N5Zr_rilbG_aXiqHZzHo5miZxhrEL49AJ5R5gb5c3kGMUMqQNjWGPisIm4PSkKa_L6Cpe_

lawsuits against Plaintiff David and the Entity Plaintiffs, all to benefit their illegal enterprise.

The Attorney Defendants were enabled by one another and retained experts to assist in The Attorney Defendants' committing the predicate offenses of extortion, bribery, obstruction of justice and mail fraud, solely because of each Attorney Defendants' positions in their enterprise and their involvement in or control over the enterprise's affairs and because their offenses of extortion, bribery, obstruction of justice and mail fraud related to the activities of their enterprise, i.e., to enrich themselves by filing spurious lawsuits against Plaintiff David and the Entity Plaintiffs and thereby depriving those Plaintiffs of their property.

Upon information and belief, (Allie and Carl Affidavits provide this good faith basis) Defendants Girardi, Allred, and Bloom intentionally conspired to recruit employees of Plaintiffs FilmOn and Anakando and former employees of those Plaintiffs, to independently file tort lawsuits against David alleging he committed sexual misconduct in order to extract and extort money from David and the Entity Plaintiffs in furtherance of an enterprise specifically designed to enrich Defendants.

Specifically, Defendants Allred, Bloom, Goldstein furthered their enterprise as the Attorney Defendants 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 to pay money settle with the parties who sued Plaintiff David and the Entity Plaintiffs.

Defendants Girardi, Allred and Bloom are guilty of extortion committed to further the criminal enterprise because they sought money or property from Plaintiff David and the Entity Plaintiffs, to which they did not have, and could not reasonably believe they had, a claim or right.

Plaintiff David, accompanied by his then attorney Barry Rothman went to the DA and reported Elizabeth Taylor and Mahim Kahn for trying to extort Plaintiff David by demanding \$ 3.5 Million dollars from him.

Alki to provide dates and details.

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 committed to further the enterprise.

Plaintiff David did all that he could do to inform the Beverly Hills Police Department that the Attorney Defendants were trying to extort money from him, even going so far as to file a police report with the

Department, complete with his formal statement setting forth relevant facts and the affidavits of two employees of the Plaintiff entities. [letter to BHPD - filmonpersonal@gmail.com - Gmail \(google.com\)](#).

David's affidavit, dated July 16, 2021, stated in relevant part:

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

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

endless press coverage.

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

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

- *I was in fact firing her for defrauding me of \$40 000 but I had yet to let her know that.*

- o Criminal wrongdoing: In testimony under oath, Jones denied being a federally convicted felon, who had a felony warrant at the time of trial from willful failure to pay restitution in connection with a federal fraud conviction;

- o I have attached a statement under oath from Ciara Menifee, who states that attorney Lisa Bloom pressured her to give a false statement, which she refused to do, and that Ms. Jones had targeted me regarding false claims of sexual abuse; and

- o I have attached a statement under oath from Grant Zimmerman, who states that it was his impression that Ms. Jones targeted me with false claims of harassment.

- *Elizabeth Taylor v. Alki David*, case no. BC649025, brought by attorney Lisa Bloom, is a pending case.

- *Criminal wrongdoing: Though this trial was a filled with moments of unbelievably callous perjury by Lisa Bloom and her gang it all began with allegations of sexual harassment and assault that were dropped on the day of the trial!*

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

In this first trial, the jury believed that there was a fraud and conspiracy afoot by Lisa Bloom - the jury was hung 8-4 in my favor. But the damage was being done in a very narrow targeted perversion of the law

that has been devastating to me personally and the lives of many hundreds of employees, family and friends whose lives have been hugely damaged.

- *Mahim Khan v. Alki David*, case no. BC654017, brought by attorney Gloria Allred, alleges that I

o **Criminal wrongdoing: Kahn threatened her former roommate, Lauren Berkley, not to truthfully testify in my favor about Kahn's fabricated allegations against me. Berkley submitted a police report documenting the threat. Additionally, Kahn's attorney, Nathan Goldberg (partner of Gloria Allred) forged my attorney's signature on a witness list that was submitted to the court prior to trial. While attempting to collect her judgment against me in Switzerland, Kahn's attorneys [including Gloria Allred] criminally misrepresented and fabricated that I had sustained criminal convictions for sexual abuse in the United States. At present, I have filed a criminal complaint in Switzerland with the State Prosecutor alleging various deceptions in Kahn and her attorneys' attempt to seize my assets, including trying to enforce punitive damages portion of a judgment, which is not permitted in Switzerland. (Emphasis in original).**

- *Lauren Reeves, v. Alki David*, case no. BC643099, brought by attorney Gloria Allred.

o **Criminal wrongdoing: As with Mayim Kahn, Defendant Allred and Swiss counsel are trying to seize assets in Switzerland.**

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

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

-

- o Criminal wrongdoing: As numerous law enforcement authorities are aware, attorney Tom Girardi has defrauded numerous clients out of millions of dollars and is the subject of various state and federal investigations. The California State Bar has already disbarred him from practicing law; and
- o In Mr. Zimmerman's attached statement under oath he states that Ms. Nicholls never complained to him about anything improper with me.

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

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

Plaintiff David's attempted to have law enforcement investigate the ongoing extortions and defamations committed by Defendants Girardi, Allred and Bloom to further the illegal enterprise. However, Plaintiff David's efforts were ignored, as were Plaintiff David's *three* complaints to the State Bar of California. **Attach three complaints.**

Further, after obtaining judgments against Plaintiff David, Defendant Mahim Khan and her attorney, Gloria Allred, filed spurious contempt actions against Plaintiff David, seeking outrageous, duplicative and meritless court orders such as:

<https://mail.google.com/mail/u/0/#search/Dana+cole/FMfcgzGpGSzQdqVtwlspFnZkZVzjdhJG?projector=1&messagePartId=0>.

The Attorney Defendants' enterprise is horizontally related because the predicate acts of those Defendants committing offenses, motivated by a desire to deprive Plaintiff David and the Entity Plaintiffs of money and property, including the Attorney Defendants committing the predicate offenses of extortion, bribery, obstruction of justice and mail fraud have distinct similarities regarding the following characteristics: results (money judgments), participants (The Attorney Defendants and The Litigating Defendants, consisting of a group of former employees of Plaintiff David and the Entity Plaintiffs), victims

(Plaintiff David and the Entity Plaintiffs), methods of commission (the filing of spurious lawsuits against Plaintiff David and the Entity Plaintiffs.

In the various lawsuits filed against Plaintiff David and the Entity Plaintiffs, Plaintiffs' counsel informed courts that there were concerns regarding the Attorney Defendants unethically exchanging documents and having wrongful interchanges regarding various Attorney Defendants and their firms. [Transcript - filmonpersonal@gmail.com - Gmail \(google.com\)](mailto:filmonpersonal@gmail.com)

Upon information and belief, there exists a strong threat of a repetition of such fraudulent actions by Defendant Attorneys and that their extortion and obstruction of justice will extend indefinitely into the future.

Not only do Defendant Attorneys continue to harass, threaten and extort Plaintiff David and the Plaintiff Attorneys' in the United States, the United Kingdom and Switzerland, as set forth more fully in this Complaint, Defendants Allred and Bloom are being sued for fraud by Rose McGowan. **ALKI to provide details.**
<http://www.tvmix.com/la-court-gives-ok-to-hollywood-actress-rose-mcgowan-fraud-suit-against-harvey-weinstein-and-lisa-bloom/123>

Further, Paul Marciano, co-founder Guess, Inc. is suing Defendant Bloom for civil extortion, alleging that Bloom improperly tried to extort settlement money from Marciano and, that in doing so, she lied by accusing Marciano of rape when Bloom's client expressly told Bloom not to allege rape.

https://embed.documentcloud.org/documents/21832954-2022_05_02-marciano-v-bloom/?embed=1&responsive=1&title=1.

Defendant Bloom also falsely accused Plaintiff David of Rape in a public forum - the Stanley Mosk Court House where the Superior Court of California conducts proceedings. **Link to video.** Defendant Bloom's actionable, blatant defamation of Plaintiff David has caused David enormous harm and has damaged his reputation.

SHALL WE ADD WYNN?

<https://news.bloomberglaw.com/daily-labor-report/bloom-sex-harassment-firm-fails-to-nix-steve-wynns-libel-suit>

PATTERN Two cases that Allred has Alec Baldwin shares and me Girardi and Dordick Gloria Allred and Dordick Share screen graphs of Trellis and Dordick & Allred and Dordick & Girardi And that Keith was with both firms.

Wynn

Marciano - Bloom

Illinois litigation

Rose McGowan - Bloom

50 Cent

Chris Brown

All of whom have challenged Allred and Bloom, but they incessantly pursue them nevertheless.

Girardi School of Law

Depravity of it

<https://www.law360.com/articles/1349235/girardi-s-legacy-in-shambles-amid-shakespearean-scandal>

The Marciano and McGowan’s lawsuits, all filed in proximity to the Attorney Defendants filing frivolous lawsuits against Plaintiff David and the Entity Plaintiffs, thus evincing an ongoing pattern of racketeering activity to further the Attorney Defendants’ enterprise that is designed to extort money, tamper with witnesses and defraud citizens of their money. **Insert Rose McGowan, Marciano and Wynn - will any do an affidavit helping Alki to establish the pattern. Insert Edelson alleging that In the suit, the Edelson law firm referred to Girardi and his firm as “the largest criminal racketeering enterprise in the history of plaintiffs’ law.” Among the allegations made was that Girardi corrupted the State Bar, “allowing [him] to maintain a spotless record before the bar and enabling him to continue stealing from clients.”**

<https://www.latimes.com/california/story/2022-07-08/in-wake-of-failed-handling-of-tom-girardi-state-bar-moves-against-license-of-former-executive-director>

<https://thehill.com/homenews/administration/365068-exclusive-prominent-lawyer-sought-donor-cash-for-two-trump-accusers/>

Strategy Question: If Alki and the Entity Plaintiffs wish to allege an open-ended continuity, we may wish to refrain from naming Girardi as a Defendant - as if we do, we risk a court in the Ninth Circuit holding there is no open-ended continuity where one of the Defendants has ceased committing predicate acts. *See Turner v. Cook*, 362 F.3d 1219, 1230 (9th Cir. 2004). Whereas, if we wish to establish a closed-ended continuity, we need to establish some showing of duration over “a substantial period of time “so long that there is a threat that conduct will occur in the future.” Because the Elizabeth Taylor case is ongoing vis a vis a retrial, the appeal in the *Mahim Khan* case is ongoing, and the collection actions pursued by Defendant Chora and Defendant Allred in Switzerland, there is a threat that conduct will occur in the future.

Importantly, the law in various federal court districts varies vastly on this element and counsel needs to take that into account with regard to the decision on which district courts to file the action(s) in.

Strong Factual Nexus Suggesting Coordination Between the Attorney Defendants To Further the Illegal Enterprise

Note: We need to establish the existence of conversations and meetings between the Attorney Defendants. Note: we can imply there were such meetings because in the *Reeves* case, Defendant Goldberg tried to introduce documents that he had not disclosed in that litigation and counsel for Alki, Ellyn Garofolo, went on the record stating Goldberg had tried to introduce documents from one of Lisa Bloom’s cases asserted against Alki when those documents had not been properly disclosed. Further, Defendant Goldberg filed an improper list

of witnesses and exhibits in that he: 1) listed documents that had not been produced in the *Reeves* case, but that had been produced by Defendant Bloom in another of the Litigating Defendant's cases; and 2) forged Elyn Garofolo's signature on that filing.

I need to review all transcripts to see if there are any more statements demonstrating the existence of a conspiracy between Defendant Attorneys.

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, Blom 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 \(google.com\)](mailto:FW:139167.491786KhanvHologramUSA,Inc,etal.(BC654017)-filmonpersonal@gmail.com)

Defendant Goldberg in the *Reeves* case represented Reeves¹⁶ 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.¹⁷

¹⁶ *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.

¹⁷

<https://mail-attachment.googleusercontent.com/attachment/u/0/?ui=2&ik=68ad5627e5&attid=0.1&permmsgid=msg-f:1581550983980536>

motivated by the Attorney Defendants' wanting to harm Plaintiff David and the Entity Plaintiff's property and conducting their activities furthering the criminal enterprise by engaging in activities affecting interstate and foreign commerce.

Upon information and belief, the Attorney Defendants' pattern of racketeering activities were actions taken to perpetrate fraud against Plaintiff David and the Entity Plaintiffs.

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 Alki, accompanied by his then attorney Barry

Rothman, went to the District Attorney in Los Angeles and reported Elizabeth Taylor and Mahim Khan for trying to extort Plaintiff David by demanding \$ 3.5 Million dollars. **Pull Emails Barry - UPLOADING ON JULY 3. INSERT**

INSERT

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 the venerable 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; Chastity Jones (Litigating Defendants), knowingly and wilfully participated in the interrelated enterprise calculated to extort money from Plaintiff David and the Entity Plaintiffs.

Plaintiff David, accompanied by his then attorney Barry Rothman went to the DA and reported Elizabeth Taylor and Mahim Kahn for trying to extort Plaintiff David by demanding \$3.5 Million from him. **Alki to provide dates and details. We expect this to be in one of the 40 boxes**

that are forthcoming from Fred's firm.

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 \(latimes.com\)](#)

As to Defendant Allred, her pattern of manipulating witnesses, and, upon information and belief, in some instances, 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*¹⁸, 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

¹⁸ *Roe v. Wade*, 410 U.S. 113 (1973), overruled by *Dobbs v. Jackson Women's Health Organization*,

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 contract 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 Distress¹⁹

Plaintiff David and the Entity Plaintiffs restate paragraphs 1 through XXXX

of this Complaint,

¹⁹ **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.

<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 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.

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 \(latimes.com\)](#)

Corporate Defamation

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>

ADD TO PATTERN

Article Re: Edelson filing

<https://news.bloomberglaw.com/us-law-week/edelson-sues-girardi-law-firm-alleging-100-million-fraud-plot>

email, using wire communications in interstate and foreign commerce om knew that he needed to protect himself and the Girardi Family Enterprise from regulators, especially from the State Bar—the agency charged with regulating and disciplining attorneys in California. To insulate the enterprise, Tom took State Bar officials and employees to expensive restaurants and paid for meals, flew them around on his private jet, and hosted them at extravagant parties.

64. As a result, despite the numerous complaints that were filed against Tom over the years (and the dozens of lawsuits that were filed against him and Girardi Keese in the courts), the State Bar neglected to conduct a single investigation, allowing Tom to maintain a spotless record before the Bar and enabling him to continue stealing from clients.

65. With the State Bar firmly on his side and under his control, Tom had the freedom to operate the Girardi Family Enterprise with impunity. Throwing all sense of ethics out the window,

Tom and other attorneys from his firm acted as though the professional rules of responsibility didn't exist. 14 COMPLAINT

Erika had actual and specific knowledge that for at least 12 years, all

her expenses were paid by the Girardi Family Enterprise through Girardi Keese as she was generating them.

63. Finally, Tom knew that he needed to protect himself and the Girardi Family

Enterprise from regulators, especially from the State Bar—the agency charged with regulating and disciplining attorneys in California. To insulate the

enterprise, Tom took State Bar officials and employees to expensive restaurants and paid for meals, flew them around on his private jet, and hosted them at extravagant parties.

64. As a result, despite the numerous complaints that were filed against Tom over the years (and the dozens of lawsuits that were filed against him and Girardi Keese in the courts), the State Bar neglected to conduct a single investigation, allowing Tom to maintain a spotless record before the Bar and enabling him to continue stealing from clients.

65. With the State Bar firmly on his side and under his control, Tom had the freedom to operate the Girardi Family Enterprise with impunity. Throwing all sense of ethics out the window, Tom and other attorneys from his firm acted as though the professional rules of responsibility didn't exist. 3

B. Money begins to run out, and Erika obfuscates to the media

66. Even with Tom's influence, prestige, and conspicuous wealth on display, the Girardi Family Enterprise began to flounder in 2019. Because the enterprise was always behind on payments to clients and creditors, Tom and Girardi Keese routinely sought litigation funding to bridge the gap. For years, this money flowed freely based on Tom's reputation. But eventually, the

3 Even after the Girardi Family Enterprise was uncovered in December 2020, the State Bar has acted to them in its investigation. Under pressure from the LA Times and Law360, the Bar finally appointed an outside prosecutor to self-investigate the Bar's connections with Girardi Keese. But as to the other members of the Girardi Family Enterprise, they have made clear that the Bar intends to limit the investigation to only the acts underlying the Lion Air case. Even this work is limited: the

Bar ultimately secured an order of restitution (at that point

duplicative) to some of the Lion Air

Clients, but they forgot about Mr. Multi. The State Bar has threatened retaliation against lawyers that have questioned the Bar's impartiality.

Defendant United States-Based Attorneys wilfully employed similar methods - they obstructed justice when they coached clients and witnesses in lawsuits they brought on behalf of the Litigating Defendants to allege that Plaintiff David and the Entity Plaintiffs acted wrongfully toward the Litigating Defendants, whether within an employment context or a sexual misconduct context, or both.

The United States-Based Attorney Defendants wilfully obstructed justice, 18 U.S.C. §§ 1503, in furtherance of the continuous enterprise.

Specific Admissible Evidence of RICO Specified Crimes by Named United-States Based Defendants

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.

Specifically, Allred **fill in and move content**

Defendant Girardi

General Allegations of Wrongdoing Against The United States-Based Attorneys

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.

Specifically, Allred **fill in and move content**

General Allegations of Wrongdoing Against The Litigating Defendants

Dordick and Bakhtiar - Jane Dough matter

Attorney Chora's Obstruction of Justice

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. Upon information and belief, the **exact**

judgment

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 \$8,000,000 in punitive damages **against Plaintiff David only**.

Upon information and belief, Defendant Chora followed inappropriate and unlawful collection procedures.

Similarly **MOVE - DROPBOX TO BE MADE BY ALKI**.

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

Pick up Here is the colluding text chain of record in witness Mary Rizzo's deposition by Defendant Bloom in the *Jones* litigation.

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



Your account has been limited until you provide some additional information 🔍 Inbox x



service@paypal.com

📧 to tickets@hologramusa.com ▾

Hello Alkiviades David,

We're contacting you to let you know that we received a Garnishment from **CHORA** YOUNG LLP that affects your Account. A Garnishment is the legal seizure of property or personal Accounts to satisfy a debt. The Garnishment requires us to turn over any funds in your Account to **CHORA** YOUNG LLP.

If you have questions, please contact Joseph **Chora**, Esq. at the following:
joseph@cym.law
(626) 744-1838

Sincerely,
PayPal, Inc.

Copyright © 1999-2021 **PayPal**. All rights reserved.

🔍 Reply 🔍 Reply all ➡ Forward

Your account has been limited until you provide some additional information

From **service@paypal.com** 👤
To **tvweb@filmon.com** <tvweb@filmon.com> 👤
Date **Fri 16:54**

Hello Alkiviades David,

We're contacting you to let you know that we received a Garnishment from **CHORA** YOUNG LLP that affects your Account. A Garnishment is the legal seizure of property or personal Accounts to satisfy a debt. The Garnishment requires us to turn over any funds in your Account to **CHORA** YOUNG LLP.

If you have questions, please contact Joseph Chora, Esq. at the following:
joseph@cym.law
(626) 744-1838

Sincerely,
PayPal, Inc.

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and in *Mahim Khan, ALKI - WHAT OTHER CASES WERE
ADD ELLYN YOU PRECLUDED FROM TESTIFYING ELLYN'S
BRIEF HERE,*

Plaintiff David and the Entity Plaintiffs could not fully assert defenses in the various lawsuits described herein. Plaintiff David and the Entity Plaintiffs suffered judgments obtained by the United States-Based Attorney Defendants on behalf of the Litigating Defendants.

Specific Admissible Evidence of Rico Specified Crimes by Named Individual Defendants

Litigating Defendant Khan was the subject of the above 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.

PICK UP Dordick and Bakhtiar - Jane Dough matter

EXTORTION

Title 18 U.S.C. Section 875(d) criminalizes the conduct engaged in by Defendants Girardi, Allred, Bloom, Goldberg and **WHAT OTHER ATTORNEY DEFENDANTS CAN WE NAME IN THIS COUNT** 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. 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 Alki, accompanied by his then attorney Barry Rothman, went to the District Attorney in Los Angeles and reported Elizabeth Taylor and Mahim Khan for trying to extort

Plaintiff David by demanding \$ 3.5 Million dollars. **Pull Emails**

Barry - UPLOADING ON JULY 11. INSERT

INSERT

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.

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, predicate claims pursuant to RICO Move: 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, tampering with witnesses, 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.

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 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.

EXTORTION

Title 18 U.S.C. Section 875(d) 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 District Attorney in Los Angeles and reported Elizabeth Taylor and Mahim Khan for trying to extort Plaintiff David by demanding \$ 3.5 Million dollars. **Pull Emails Barry - UPLOADING ON JULY 5. Does Fred have these emails perchance?**

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 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 from Plaintiff David and the Attorney Defendants, and the Attorney Defendants tampering with witnesses by telling them what to say, and Defendant Goldberg erring with regard to the introduction of documents and exhibits, and Defendant Goldberg falsifying the signature of Plaintiff's Counsel Ellyn Garofalo, 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.

Defendant Attorneys' Illegal Patterns of Defrauding Plaintiffs, Obstructing Justice and Soliciting Bribery

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, who were, and continue to be, victimized by Attorney Defendants' continuous pattern of racketeering conducted to benefit their enterprise, including mail fraud, extortion, tampering with witnesses, obstruction of justice, 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.

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.

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.

As to Defendant Allred, this 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 \(forbes.com\)*](#).



Upon information and belief, Plaintiff David and the Entity Plaintiffs assert that Defendant Allred, conspiring with the other Attorney Defendants, including Goldberg, insert carry on with their criminal enterprise, coaching claimants to lie and mischaracterize their interactions with Plaintiff David and file spurious lawsuits against Plaintiff David and the Entity Plaintiffs in order to deprive the plaintiffs of their property.

Moreover, the settlement agreement in *D'Onofrio v. Alki David Productions Inc., FilmOn Com., Inc. and Alki David, Case No. BC496165* contained a confidentiality provision and Defendant

Goldberg wrongfully divulged the confidential settlement's provisions.

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.

Bribery

On November 6, 2012, Monica D'Oofrio filed *D'Onofrio v. Alki David Productions Inc., FilmOn Com., Inc. and Alki David*, Case No. BC496165.²⁰ On May 10, 2013, alleging employment discrimination. Plaintiff David settled the case for a minimal amount as nuisance value.

Alki - D'Onofrio's counsel was Gary A. Smith, Manuwal & Manuwal - please verify whether you want Mssr. Smith named as a party defendant?

Thus, began a long series of spurious and harassing lawsuits filed by Defendant Attorneys against Plaintiff David and the Entity Plaintiffs that were part of an ongoing pattern employed by the Defendant

²⁰

<https://trellis.law/case/BC495165/MONICA-D-ONOFRIO-VS-ALKI-DAVID-PRODUCTIONS-INC-ET-AL?output=pdf>.

Attorney, their Clients and Experts to extort money from Plaintiff David and the Entity Plaintiffs.

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

Affidavits needed: REQUESTED FROM DANA COLE

Note to Counsel: Allie's affidavit establishes that she saw other Plaintiffs contrive claims by constantly entering Plaintiff David's office in hopes of enticing him to commit offensive conduct.

Upon information and belief, former employees who sued Plaintiff David (Litigating Defendants) often met at a restaurant near Plaintiff Entity Hologram, Inc.,'s location, to collude 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 former employees, encouraged and aided and abetted by

the Defendant Attorneys, targeted Plaintiff David as a victim to name in spurious lawsuits. Former employees and their counsel deemed Plaintiff David to be their gravy train. In filing this lawsuit - Plaintiff David and the Plaintiff Entities seeks justice to recoup millions of dollars, consisting of lost profits, improperly obtained court judgments.

On February 2, 2017, Elizabeth Taylor and Chastity Jones filed a Labor-Wrongful Termination lawsuit in Los Angeles County Superior Court against Plaintiffs David, Hologram USA Inc., FilmOn TV. Inc. There is no truth to their allegations and, 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.

In April, 2019, Chastity Jones won an award against Plaintiff David for \$11 Million in compensatory damages, an amount that was reduced by \$437,120 by the court.

In October, 2019, a jury deadlocked 8-4 in Elizabeth Taylor's suit. Los Angeles County Superior Court Judge Christopher Lui declared a mistrial.

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, dropped the claim on the eve of trial.

BRIEF STATEMENT OF THE CASE

Karl Zirpel filed this lawsuit. He is called a plaintiff. He seeks damages and other relief from Alki David, who is called a defendant.

Karl Zirpel claims that Alki David subjected him to harassment and discrimination based upon his sexual orientation and violated wage and hour laws. Defendant denies those claims. Defendant also contends that Plaintiff caused Defendant financial harm, and if Plaintiff was terminated it was not for discriminatory reasons as claimed by Plaintiff.

Alki David has also filed what is called a cross complaint against Karl Zirpel. Alki David is a defendant, but also is called the cross-complainant. Karl Zirpel is called a cross-defendant.

In his cross-complaint, Alki David claims Karl Zirpel committed sexual battery and battery against Alki David. Karl Zirpel denies those claims.

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.

Note: Alki was previously involved in unrelated litigation over a business dispute with Barry Diller, whose company, IAC owns the Daily Beast.

In 2019, Lauren Reeves sued Plaintiff David and Plaintiffs

Hologram USA and Alki David Productions for sexual battery and sexual harassment. Defendant Goldberg 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., obtained an award of \$58 million for battery, sexual battery and sexual harassment against Plaintiff Alki David. This matter is on appeal before the Supreme Court of California. **Link Petition for Review when Fred Heather sends that filing.**

On September 30, 2020, Jane Dough (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. in Los Angeles Superior Court, LASC No. 7498 - (we need the rest of the case number from Fred Heather). Plaintiff Doe's attorneys are Defendants Ebby S. Bakhtiar, Gary A. Dordick, Thomas Vincent Girardi. Plaintiff Alki is Fred D. Heather.

Mail Fraud

18 U.S.C. §§ 1341 and 1343 address the commission of the crime of mail fraud and wire fraud.

Plaintiffs allege that Gloria Allred, Esq., in her individual capacity, and as a principal in Allred, Maroko & Goldberg; Nathan Goldberg, Esq., in his individual capacity, and as a partner in Allred, Maroko & Goldberg; Delores Y. Leal, Esq., in her individual capacity and as a partner of Allred, Maroko & Goldberg; Renee Mochkatel, Esq., in her individual capacity and as a partner of Allred, Maroko & Goldberg; Lisa Bloom, Esq., in her individual capacity and as the owner of the Law Offices of Lisa Bloom; Law Offices of Lisa Bloom; Thomas V 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 and his

capacity as a former partner in Girardi & Keese. 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; (Attorney Defendants), culpable persons capable of holding legal or beneficial interests in property, have participated in long-term, organized conduct of a criminal enterprise affecting interstate and international commerce through an interrelated pattern of racketeering activity, in violation of RICO laws set forth in 18 U.S.C. §§1962 (b)(c)(d).

Utilizing the mails and wires, the Attorney Defendants participated in and have furthered their enterprise through a plan and a scheme to defraud that continues to this day and encompasses acts of artifice or deceit that were and are intended to deprive Plaintiff David and the Entity Plaintiffs of their property and money.

There was a reasonable foreseeability that, in perpetrating the mail fraud, the Attorney Defendants would and did utilize the mail or wires.

The Attorney Defendants' scheme to defraud included the use of the mails to communicate with witnesses, opposing counsel, and experts in actions intended to defraud Plaintiff David and the Entity Plaintiffs.

Plaintiff David and the Plaintiff Entities' prior counsel 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.²¹ Upon information and belief Defendant Attorneys in that case and the other lawsuits recounted in this Complaint all used the mail and wires to defraud Plaintiff David and the Entity Plaintiffs of their money and property so as to further the illegal enterprise.

Note to Counsel: We need to add more specificity here - can we prove through Swiss counsel that Gloria Allred in Switzerland

21

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-ayZU7civdXpsd83db8fANLjou0wH6gkHQitU6I6gIB2oTWBBW3QENef-uHEQi8uCtR1Q106GKiQb8tbarCdfhAFWgg8LVANTNjBJZXxG_e_Q5K1A8XJKB64JVy6sSB4rzkkOYY7AzKnZRG7jIIhW7bXi_EK8DHuWxf9H3W4q6iyThtqtJBxZwBdYxPWUZZDF2Vsm1Du3tU6RaeVn8ufRVXWamy_uUWhGy4kXh5FIi8MF8eud_NL8D0ar9SyjM5ea_nlukQ_Ouj2umUYkIza-_FELth5XIFPHuCRQgdWjYo99iaUX8N_U2VZMxcWK67W8DNcnwloh3FTheQqZSkSFac2raYoI7HFVL425j2jvqeTPLgkQBJTwcZA9ykbUM8Kp6xMcIJ969CgAdEJMmjzxnFQw4zYeJJhp9amLuII-qop28yDIa8xy5ecquyB5FkqeKM8Vax3XdWZCtKZs4cA_XVf8HwXOpVk9_wGwh0P7hGJVy0pR3RBKb_T3WUN7Fxc-GPWIOfOpGZRnhhgH_NWsNR8Jo5rvrVxEpWM6S0-st_YhCrVHLp3xIE1zaIGXMmH6ly89w6yrnBWvcD6B1_7VIPVeipqhd-Zc3-hHlnO7z45w1B9HhJQbE1j7_hTBRdMIYx7oV95ahboF1QE1osLCnlAf-Z0UIpvgXld7JqtlwpJjGDS-1DuNYyfYHCNDNnH3JTUJyaD4nVtOpBQkgYcfUh62uPjeTOgolbeQqBik19h4D7N5Zr_rilbG_aXiqHZzHo5miZxhrEL49AJ5R5gb5c3kGMUMqQNjWGPisIm4PSkKa_L6Cpe_

and/or that Lisa Bloom in the UK utilized wires to perpetrate their fraud.

As to Defendant Allred's pattern of using the mail to manipulate witnesses, and, upon information and belief, paying the witnesses to testify in a particular fashion, is a pattern of fraud, 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 \(forbes.com\)*](#).

Upon information and belief, Plaintiff David and the Entity Plaintiffs assert that Attorney Defendants carry on with their criminal enterprise, using the mail and wires to coach claimants to lie and mischaracterize their interactions with Plaintiff David and to file spurious lawsuits against Plaintiff David and the Entity Plaintiffs in order to deprive the plaintiffs of their property.

Strategy Note: Fred has some of Barry Rothman's (deceased) files as I understand it so counsel needs to assess all correspondence and

emails to bolster the mail and wire claim.

I note that, tellingly, Barry Rothman, sought to obtain Lauren Reeves' cell phone records to counter her claims against Plaintiff David. 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.²²

At all relevant times, Defendant Attorneys and Does 1-25 were individual persons within the meaning of 18 U.S.C. Sections 1961(4),

22

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-ayZU7civdXpsd83db8fANLjou0wH6gkHQitU6I6gIB2oTWBBW3QENef-uHEQi8uCtR1Q106GKiQb8tbarCdfhAFWgg8LVANTNjBJZXxG_e_Q5K1A8XJKB64JVy6sSB4rzkkOYY7AzKnZRG7jIIhW7bXi_EK8DHuWxf9H3W4q6iyThtqtJBxZwBdYxPWUZZDF2Vsm1Du3tU6RaeVn8ufRVXWamy_uUWhGy4kXh5FIi8MF8eud_NL8D0ar9SyjM5ea_nlukQ_Ouj2umUYkIza-_FELth5XIFPHuCRQgdWjYo99iaUX8N_U2VZMxcWK67W8DNcnwloh3FTheQqZSkSFac2raYoI7HFVL425j2jvqeTPLgkQBJTwcZA9ykbUM8Kp6xMcIJ969CgAdEJMmjqzxnFQw4zYeJJhp9amLuIl-qop28yDIa8xy5ecquyB5FkqeKM8Vax3XdWZCtKZs4cA_XVf8HwXOpVk9_wGwh0P7hGJVy0pR3RBKb_T3WUN7Fxc-GPWIOfOpGZRnhhgH_NWsNR8Jo5rvrVxEpWM6S0-st_YhCrVHLp3xIE1zaIGXMmH6ly89w6yrnBWvcD6B1_7VIPVeipqhd-Zc3-hHlnO7z45w1B9HhJQbE1j7_hTBRdMIYx7oV95ahboF1QE1osLCnltAf-Z0UIpvgXld7JqtlwpJjGDS-1DuNYyfYHCNDNnH3JTUJyaD4nVtOpBQkgYcfUh62uPjeTOgolbeQqBik19h4D7N5Zr_rilbG_aXiqHZzHo5miZxhrEL49AJ5R5gb5c3kGMUMqQNjWGPisIm4PSkKa_L6CPe_

1962(e), and Defendant Attorneys and Does 1-25 constituted an enterprise pursuant to 18 U.S.C. Sections 1961(4), 1962(e), who associated with and/or participated in the conduct of said enterprise's affairs doing business in the form of an association in fact.

Between 2012 and 2022, Defendant Attorneys and Does 1-25, in their individual capacity, 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. Sections 1961(1), 1961 (5), and 1962(c).

The Enterprise's Parade of Spurious, Defamatory Lawsuits, Extortion and Witness Tampering

Upon information and belief, Defendants Girardi, Allred and Bloom conspired to pursue vexatious litigation creating a continuous and related pattern of racketeering activity against Plaintiff David and the Entity Defendants by filing numerous spurious and unfounded lawsuits against Plaintiff David and the Entity Plaintiffs, all to benefit their illegal enterprise.

The Attorney Defendants were enabled by one another and

retained experts to assist in The Attorney Defendants' committing the predicate offenses of extortion, bribery, obstruction of justice and mail fraud, solely because of each Attorney Defendants' positions in their enterprise and their involvement in or control over the enterprise's affairs and because their offenses of extortion, bribery, obstruction of justice and mail fraud related to the activities of their enterprise, i.e., to enrich themselves by filing spurious lawsuits against Plaintiff David and the Entity Plaintiffs and thereby depriving those Plaintiffs of their property.

Upon information and belief, (Allie and Carl Affidavits provide this good faith basis) Defendants Girardi, Allred, and Bloom intentionally conspired to recruit employees of Plaintiffs FilmOn and Anakando and former employees of those Plaintiffs, to independently file tort lawsuits against David alleging he committed sexual misconduct in order to extract and extort money from David and the Entity Plaintiffs in furtherance of an enterprise specifically designed to enrich Defendants.

Specifically, Defendants Allred, Bloom, Goldstein furthered their enterprise as the Attorney Defendants 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 to pay money settle with the parties who sued Plaintiff David and the Entity Plaintiffs.

Defendants Girardi, Allred and Bloom are guilty of extortion committed to further the criminal enterprise because they sought money or property from Plaintiff David and the Entity Plaintiffs, to which they did not have, and could not reasonably believe they had, a claim or right.

Plaintiff David, accompanied by his then attorney Barry Rothman went to the DA and reported Elizabeth Taylor and Mahim Kahn for trying to extort Plaintiff David by demanding \$ 3.5 Million dollars from him.

Alki to provide dates and details.

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 committed to further the enterprise.

Plaintiff David did all that he could do to inform the Beverly Hills Police Department that the Attorney Defendants were trying to extort money from him, even going so far as to file a police report with the Department, complete with his formal statement setting forth relevant facts and the affidavits of two employees of the Plaintiff entities. [letter to BHPD - filmonpersonal@gmail.com - Gmail \(google.com\)](#).

David's affidavit, dated July 16, 2021, stated in relevant part:

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

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

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

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

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

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

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

- *Mahim Khan v. Alki David*, case no. BC654017, brought by attorney Gloria Allred, alleges that I
 - o **Criminal wrongdoing: Kahn threatened**

her former roommate, Lauren Berkley, not to truthfully testify in my favor about Kahn's fabricated allegations against me. Berkley submitted a police report documenting the threat. Additionally, Kahn's attorney, Nathan Goldberg (partner of Gloria Allred) forged my attorney's signature on a witness list that was submitted to the court prior to trial. While attempting to collect her judgment against me in Switzerland, Kahn's attorneys [including Gloria Allred] criminally misrepresented and fabricated that I had sustained criminal convictions for sexual abuse in the United States. At present, I have filed a criminal complaint in Switzerland with the State Prosecutor alleging various deceptions in Kahn and her attorneys' attempt to seize my assets, including trying to enforce punitive damages portion of a judgment, which is not permitted in Switzerland. (Emphasis in original).

- *Lauren Reeves, v. Alki David*, case no. BC643099, brought by attorney Gloria Allred.
 - o **Criminal wrongdoing: As with Mayim Kahn, Defendant Allred and Swiss counsel are trying to seize assets in Switzerland.**
- In Switzerland four separate counts of coercion with intent to defraud have been filed with public prosecutors there.
- *Jane Doe (a/k/a Margurita Nicholls) v. Alki David*, case no. _____, brought by attorney Thomas Girardi and _____, alleges that I raped her at Hologram offices. However, she has made other rape claims, including against her husband and best friend. A month

after the alleged rape, Nicholls brought me a birthday cake.

- - o Criminal wrongdoing: As numerous law enforcement authorities are aware, attorney Tom Girardi has defrauded numerous clients out of millions of dollars and is the subject of various state and federal investigations. The California State Bar has already disbarred him from practicing law; and
 - o In Mr. Zimmerman's attached statement under oath he states that Ms. Nicholls never complained to him about anything improper with me.

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

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

Plaintiff David's attempted to have law enforcement investigate the ongoing extortions and defamations committed by Defendants Girardi, Allred and Bloom to further the illegal

enterprise. However, Plaintiff David's efforts were ignored, as were Plaintiff David's *three* complaints to the State Bar of California. **Attach three complaints.**

Further, after obtaining judgments against Plaintiff David, Defendant Mahim Khan and her attorney, Gloria Allred, filed spurious contempt actions against Plaintiff David, seeking outrageous, duplicative and meritless court orders such as:

<https://mail.google.com/mail/u/0/#search/Dana+cole/FMfcgzGpGSzQdqVtwlspFnZkZVzjdhJG?projector=1&messagePartId=0>.

The Attorney Defendants' enterprise is horizontally related because the predicate acts of those Defendants committing offenses, motivated by a desire to deprive Plaintiff David and the Entity Plaintiffs of money and property, including the Attorney Defendants committing the predicate offenses of extortion, bribery, obstruction of justice and mail fraud have distinct similarities regarding the following characteristics: results (money judgments), participants (The Attorney Defendants and The Litigating Defendants, consisting of a group of former employees of Plaintiff David and the Entity Plaintiffs), victims (Plaintiff David and the Entity Plaintiffs), methods of commission (the filing of spurious lawsuits against Plaintiff David and the Entity Plaintiffs).

In the various lawsuits filed against Plaintiff David and the Entity Plaintiffs, Plaintiffs' counsel informed courts that there were concerns regarding the Attorney Defendants unethically exchanging documents and having wrongful interchanges regarding various Attorney Defendants and their firms. [Transcript - filmonpersonal@gmail.com - Gmail \(google.com\)](mailto:filmonpersonal@gmail.com)

Upon information and belief, there exists a strong threat of a repetition of such fraudulent actions by Defendant Attorneys and that their extortion and obstruction of justice will extend indefinitely into the future.

Not only do Defendant Attorneys continue to harass, threaten and extort Plaintiff David and the Plaintiff Attorneys' in the United States, the United Kingdom and Switzerland, as set forth more fully in this Complaint, Defendants Allred and Bloom are being sued for fraud by Rose McGowan. **ALKI to provide details.** <http://www.tvmix.com/la-court-gives-ok-to-hollywood-actress-rose-mcgowan-fraud-suit-against-harvey-weinstein-and-lisa-bloom/123>

Further, Paul Marciano, co-founder Guess, Inc. is suing Defendant Bloom for civil extortion, alleging that Bloom improperly

tried to extort settlement money from Marciano and, that in doing so, she lied by accusing Marciano of rape when Bloom's client expressly told Bloom not to allege rape.

https://embed.documentcloud.org/documents/21832954-2022_05_02-marciano-v-bloom/?embed=1&responsive=1&title=1.

Defendant Bloom also falsely accused Plaintiff David of Rape in a public forum - the Stanley Mosk Court House where the Superior Court of California conducts proceedings. **Link to video.** Defendant Bloom's actionable, blatant defamation of Plaintiff David has caused David enormous home and has damaged his reputation.

SHALL WE ADD WYNN?

<https://news.bloomberglaw.com/daily-labor-report/bloom-sex-harassment-firm-fails-to-nix-steve-wynns-libel-suit>

The Marciano and McGowan's lawsuits, all filed in proximity to the Attorney Defendants filing frivolous lawsuits against Plaintiff David and the Entity Plaintiffs, thus evincing an ongoing pattern of racketeering activity to further the Attorney Defendants' enterprise that is designed to extort money, tamper with witnesses and defraud citizens of their money. **Insert Rose McGowan, Marciano and Wynn - will**

any do an affidavit helping Alki to establish the pattern.

Strategy Question: If Alki and the Entity Plaintiffs wish to allege an open-ended continuity, we may wish to refrain from naming Girardi as a Defendant - as if we do, we risk a court in the Ninth Circuit holding there is no open-ended continuity where one of the Defendants has ceased committing predicate acts. *See Turner v. Cook*, 362 F.3d 1219, 1230 (9th Cir. 2004). Whereas, if we wish to establish a closed-ended continuity, we need to establish some showing of duration over “a substantial period of time “so long that there is a threat that conduct will occur in the future.” Because the Elizabeth Taylor case is ongoing *vis a vis* a retrial, the appeal in the *Mahim Khan* case is ongoing, and the collection actions pursued by Defendant Chora and Defendant Allred in Switzerland, there is a threat that conduct will occur in the future.

Importantly, the law in various federal court districts varies vastly on this element and counsel needs to take that into account with regard to the decision on which district courts to file the action(s) in.

Strong Factual Nexus Suggesting Coordination Between the Attorney Defendants To Further the Illegal Enterprise

Note: We need to establish the existence of conversations and meetings between the Attorney Defendants. Note: we can imply there were such meetings because in the *Reeves* case, Defendant Goldberg tried to introduce documents that he had not disclosed in that litigation and counsel for Alki, Ellyn Garofolo, went on the record stating Goldberg had tried to introduce documents from one of Lisa Bloom’s cases asserted against Alki when those documents had not been properly disclosed. Further, Defendant Goldberg filed an improper list of witnesses and exhibits in that he: 1) listed documents that had not been produced in the *Reeves* case, but that had been produced by Defendant Bloom in another of the Litigating Defendant’s cases; and 2) forged Ellyn Garofolo’s signature on that filing.

I need to review all transcripts to see if there are any more statements demonstrating the existence of a conspiracy between Defendant Attorneys.

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, Blom 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.

- 2. 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 Reeves²³ 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.²⁴

²³ *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.

²⁴

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_Q5K1A8XJKB64JVy6sSB4rzkkOYY7AzKnZRG7jIIhW7bXi_EK8DHuWxf9H3W4q6iyThtqtJBxZwBdYxPWUZZDF2Vsm1Du3tU6RaeVn8ufRVXWamy_uUWhGy4k

Second Cause of Action
18 U.S.C. Sec. 1862 (c)

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

18 U.S.C. Sec. 1862 (c) provides, “It shall be unlawful for any person employed by or associated with an enterprise to engage in or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise’s affairs through a pattern of racketeering activity.”

Upon information and belief, the Attorney Defendants’ enterprise consisted of an ongoing association that functions as a continuing unit motivated by the Attorney Defendants’ wanting to harm Plaintiff David and the Entity Plaintiff’s property and conducting their activities furthering the criminal enterprise by engaging in activities affecting

[Xh5FIi8MF8eud_NL8D0ar9SyjM5ea_n1ukQ_Ouj2umUYkIza-FELth5XIFPHuCRQgdWjYo99iaUX8N_U2VZMxcWK67W8DNcnwloh3FTheQqZSkSFac2raYoI7HFVL425j2jvqeTPLgkQBJTwcZA9ykbUM8Kp6xMcIJ969CgAdEJMmjzxnFQw4zYeJJhp9amLuIl-qop28yDIa8xy5ecquyB5FkqeKM8Vax3XdWZCtKZs4cA_XVf8HwXOpVk9_wGwh0P7hGJVy0pR3RBKb_T3WUN7Fxc-GPWI0fOpGZRnhhgH_NWsNR8Jo5rvrVxEpWM6S0-st_YhCrVHLp3xIE1zaIGXMmH6ly89w6yrnBWvcD6B1_7VIPVeipqhd-Zc3-hHlnO7z45w1B9HhJQbE1j7_hTBReDMIYx7oV95ahboF1QE1osLCnlAf-Z0UIpvgXld7JqtlwpJjGDS-1DuNYyfYHCNDNnH3JTUJyaD4nVtOpBQkgYcfUh62uPjeTOgolbeQqBik19h4D7N5Zr_rilbG_aXiqHZzHo5miZxhrEL49AJ5R5gb5c3kGMUMqQNjWGpIsIm4PSkKa_L6CPe_](#)

interstate and foreign commerce.

Upon information and belief, the Attorney Defendants' pattern of racketeering activities were actions taken to perpetrate fraud against Plaintiff David and the Entity Plaintiffs.

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 Alki, accompanied by his then attorney Barry Rothman, went to the District Attorney in Los Angeles and reported Elizabeth Taylor and Mahim Khan for trying to extort Plaintiff David by demanding \$ 3.5 Million dollars. **Pull Emails**

Barry - UPLOADING ON JULY 3. INSERT

INSERT

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.

Plaintiff David, accompanied by his then attorney Barry Rothman went to the DA and reported Elizabeth Taylor and Mahim Kahn for trying to extort Plaintiff David by demanding \$ 3.5 Million from him. **Alki to**

provide dates and details.

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 contract 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.
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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 Distress²⁵

Plaintiff David and the Entity Plaintiffs restate paragraphs 1 through XXXX

of this Complaint,

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

²⁵ **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.

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 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.

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 \(latimes.com\)](#)

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?

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-0418-alki-david-2018-04-18-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 \$ 3.5 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

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.

Upon information and belief, Defendant Oren Warshavsky is a resident of New York;

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

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

Chabrier Avocats, SA, is a law firm based in Geneva

Switzerland.

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