

Evidence Bundle

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Case Number : ANUHCV2025/0149



IN THE HIGH COURT OF JUSTICE

ANTIGUA AND BARBUDA

Claim No: [To be assigned by Registry]

BETWEEN:

ALKIVIADES DAVID

of SwissX Island, St. John's, Antigua & Barbuda

Claimant

— AND —

1. **DAVID BOIES**, of Boies Schiller Flexner LLP
2. **GLORIA ALLRED**, of Allred, Maroko & Goldberg
3. **DANI PERETZ**, of Geneva, Switzerland & Tel Aviv, Israel
4. **SHARI REDSTONE**, of Paramount Global, and Caribbean Holdings
5. **DAPHNE BARAK**, of Beverly Hills, California and Tel Aviv, Israel
6. **MICHAEL AVENATTI**, formerly of Eagan Avenatti LLP
7. **TOM GIRARDI**, incarcerated at Federal Medical Center, Butner, North Carolina, USA
8. **BLACK CUBE LTD**, an Israeli-owned private intelligence agency based in London and Tel Aviv, Israel
9. **LIMEWIRE NFT HOLDINGS**, with assets and servers in the Caribbean
10. **EDGAR BRONFMAN SR. (Deceased)**, estate with real property in St. Barthélemy
11. **JOHN BRANCA**, of West Hollywood and Jumby Bay, Antigua
12. **JOHN MCCLAIN**, music executive, of Los Angeles and Bahamas
13. **THE EXECUTIVE MEMBERS OF THE UNITED PROGRESSIVE PARTY (UPP)**, Antigua & Barbuda
14. **And DOES 1–100**

Defendants

STATEMENT OF CLAIM

1. Parties

The Claimant, Alkiviades David (“Claimant”), is a dual-national entrepreneur, human rights advocate, and founder of SwissX, operating a sovereign wealth initiative and biofuel enterprise in St. John’s, Antigua & Barbuda.

Submitted Date: 17/04/2025 13:21

Filed Date: 17/04/2025 13:21

Fees Paid: 52.00

The Defendants, named and unknown, comprise a transnational syndicate of attorneys, intelligence agents, entertainment executives, political operatives, and private contractors who, acting in concert, have conducted a coordinated campaign of harassment, fraud, extortion, and racketeering against the Claimant. Many Defendants maintain residences, hold offshore accounts, and/or possess tangible and intellectual assets within the jurisdiction of Antigua & Barbuda or other Caribbean states including the Bahamas, St. Kitts & Nevis, Barbados, and St. Barthélemy.

2. Jurisdiction

This Honourable Court has **personal and subject-matter jurisdiction** under the laws of Antigua & Barbuda and the ECSC Civil Procedure Rules (Revised 2023), specifically where:

- Assets of the Defendants exist within Antigua & Barbuda (including real estate and bank accounts),
- Defendants have done business and committed tortious acts within the jurisdiction, and
- The harm suffered by the Claimant has had substantial effects locally, including reputational and economic damages impacting SwissX and its sovereign partnerships.

3. Factual Background

Between 2016 and 2025, the Defendants, jointly and severally, have:

- Filed and orchestrated **fraudulent lawsuits** across multiple jurisdictions including California, New York, and Europe, some of which have been **set aside or reversed** for procedural violations.
- Engaged in **conspiracy to defraud**, by fabricating witnesses, withholding exculpatory evidence, and tampering with court records and legal representatives.
- Directed **cyber and physical surveillance** operations using assets like Black Cube and Media Defender, targeting Claimant's businesses, legal advisors, and personal contacts.
- Illegally trafficked and monetized private data, music content, and intellectual property derived from the Claimant and Michael Jackson's estate via LimeWire and related platforms.
- Spread **false and defamatory narratives** in the international press and legal forums, harming the Claimant's reputation, interfering with government contracts, and deterring sovereign partners.

Notably, properties connected to the Defendants in **Jumby Bay, St. John's, Barbados**, and the **Bahamas** serve as conduits for laundering money, storing IP, and operating intelligence networks.

4. Causes of Action

The Claimant brings this action under the common law and statutory principles of:

- **Conspiracy to injure**
- **Fraudulent misrepresentation**
- **Economic tort (unlawful interference with business)**
- **Defamation**
- **Breach of international and local fiduciary duties**
- **Conversion of intellectual property**
- **Tortious abuse of process**
- **Civil conspiracy**

5. Relief Sought

The Claimant respectfully seeks:

- **General Damages** in the amount of **\$10,000,000.00 USD**, reflecting the magnitude of economic harm, reputational loss, and mental anguish.
- **Special Damages**, including loss of sovereign contracts, devaluation of intellectual property, and missed investment milestones.
- **Injunctive Relief**, restraining Defendants from further harassment, publication, or litigation relating to the matters herein.
- **Tracing and Recovery** of assets held in Caribbean jurisdictions under shell corporations or in trust.
- **Order for Disclosure** of all communications, financial documents, and related materials regarding Claimant.
- **Costs** of this proceeding.
- **Any further relief** this Honourable Court deems just and expedient.

6. Verification

I, **Alkiviades David**, being the Claimant herein, affirm that the facts stated in this Statement of Claim are true to the best of my knowledge, information, and belief.

DATED this 17 day of April 2025.



**COMMISSIONER FOR OATH
ANTIGUA & BARBUDA**

Alkiviades David, Claimant

SwissX Island, St. John's, Antigua & Barbuda

Email: ceo@swissx.com

Phone: +1 (268) 780-4133

High Court of Justice – Antigua and Barbuda

Case No: ANUHCV2025/0149

BETWEEN :-

Alkiviades David

Claimant

-and-

Shari Redstone.

Defendant

STATEMENT of SERVICE

I, Colin Dixon, Process Server are currently employed by Kent Legal UK, my place of work is at 38th St, New York, Ny 10016, USA I will say as follows.

1. I am of over 18 years of age.
2. I am authorised to make this Affidavit on behalf of the Claimant in this action.
3. I make this Affidavit from my own knowledge except where stated otherwise.
4. I make this affidavit in support of the personal service of proceedings upon the Defendant at C/O Paramount Global 1515 Broadway, New York NY10019
5. On 18 May 2025, I caused to be served upon the Defendant Shari Redstone the following documents:
 - (i) LAWSUIT Authorization codes.pdf
 - (ii) LAWSUIT Cover page and Docs_Alkiviades David.pdf
 - (iii) LAWSUIT mage_evidence_Alkiviades David.pdf
 - (iv) LAWSUIT Claim Form (6).pdf
 - (v) LAWSUIT Further Exhibits.pdf
 - (vi) Particulars of Claim QR Code (incorporating exhibits).

6. The documents were served personally by myself, to the Defendant (in person) at the following address: Paramount Global 1515 Broadway, New York NY10019
7. which is the last known address of the Defendant and is believed to be their current place of business.
8. I believe that service has been duly effected in accordance with the procedural rules and applicable international treaties/laws.

Statement of Truth

I believe that the facts stated in this Affidavit are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised by the Claimant to sign this Statement of Truth.

Name and position:

Signed: *Colin Dixon*

Dated: 17th May 2025

Place: New York USA



High Court of Justice – Antigua and Barbuda

Case No: ANUHCV2025/0149

B E T W E E N :-

Alkiviades David

Claimant

-and-

Michael Avenatti

Defendant

STATEMENT of SERVICE

I, Tom Maters Jr, Process Server are currently employed by Kent Legal UK, my place of work is at 128 E 6th St, Los Angeles, CA 90014, USA I will say as follows.

1. I am of over 18 years of age.
2. I am authorised to make this Affidavit on behalf of the Claimant in this action.
3. I make this Affidavit from my own knowledge except where stated otherwise.
 1. I make this affidavit in support of the personal service of proceedings upon the Defendant at Terminal Island Federal Correctional Institution, 1299 S. Seaside Ave, San Pedro, CA 90731
2. On 18 May 2025, I caused to be served upon the Defendant Michael Avenatti the following documents:
 - (i) LAWSUIT Authorization codes.pdf
 - (ii) LAWSUIT Cover page and Docs_Alkiviades David.pdf
 - (iii) LAWSUIT mage_evidence_Alkiviades David.pdf
 - (iv) LAWSUIT Claim Form (6).pdf
 - (v) LAWSUIT Further Exhibits.pdf
 - (vi) Particulars of Claim QR Code (incorporating exhibits).

1. The documents were served personally by myself, to the Defendant (in person) at the following address: Terminal Island Federal Correctional Institution, 1299 S. Seaside Ave, San Pedro, CA 90731
- 2.
3. which is the last known address of the Defendant and is believed to be their current place of business.
4. I believe that service has been duly effected in accordance with the procedural rules and applicable international treaties/laws.

Statement of Truth

I believe that the facts stated in this Affidavit are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised by the Claimant to sign this Statement of Truth.

Name and position:

Signed: *T. Maters Jr*

Dated: 19th May 2025

Place: Los Angeles



High Court of Justice – Antigua and Barbuda

Case No: ANUHCV2025/0149

BETWEEN :-

Alkiviades David

Claimant

-and-

MARGUERITA NICHOLS

Defendant

STATEMENT of SERVICE

I, Martin Wilson, Process Server are currently employed by Kent Legal UK, my place of work is at 8th St, Los Angeles, CA 90014, USA I will say as follows.

1. I am of over 18 years of age.
2. I am authorised to make this Affidavit on behalf of the Claimant in this action.
3. I make this Affidavit from my own knowledge except where stated otherwise.
4. I make this affidavit in support of the personal service of proceedings upon the Defendant at DORDICK LAW CORPORATION, 509 S. Beverly Drive, Beverly Hills, CA 90212
5. On 18 May 2025, I caused to be served upon the Defendant MARGUERITA NICHOLS the following documents:
 - (i) LAWSUIT Authorization codes.pdf
 - (ii) LAWSUIT Cover page and Docs_Alkiviades David.pdf
 - (iii) LAWSUIT mage_evidence_Alkiviades David.pdf
 - (iv) LAWSUIT Claim Form (6).pdf
 - (v) LAWSUIT Further Exhibits.pdf
6. Particulars of Claim QR Code (incorporating exhibits).

6. The documents were served personally by myself, to the Defendant (in person) at the following address: DORDICK LAW CORPORATION, 509 S. Beverly Drive, Beverly Hills, CA 90212
- 7.
8. which is the last known address of the Defendant and is believed to be their current place of business.
9. I believe that service has been duly effected in accordance with the procedural rules and applicable international treaties/laws.

Statement of Truth

I believe that the facts stated in this Affidavit are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised by the Claimant to sign this Statement of Truth.

Name and position:

Signed: *Martin Wilson*

Dated: 19th May 2025

Place: Los Angeles



High Court of Justice – Antigua and Barbuda

Case No: ANUHCV2025/0149

B E T W E E N :-

Alkiviades David

Claimant

-and-

GARY A DORDICK

Defendant

STATEMENT of SERVICE

I, Martin Wilson, Process Server are currently employed by Kent Legal UK, my place of work is at 8th St, Los Angeles, CA 90014, USA I will say as follows.

1. I am of over 18 years of age.
2. I am authorised to make this Affidavit on behalf of the Claimant in this action.
3. I make this Affidavit from my own knowledge except where stated otherwise.
4. I make this affidavit in support of the personal service of proceedings upon the Defendant at DORDICK LAW CORPORATION, 509 S. Beverly Drive, Beverly Hills, CA 90212
5. On 18 May 2025, I caused to be served upon the Defendant GARY A DORDICK the following documents:
 - (i) LAWSUIT Authorization codes.pdf
 - (ii) LAWSUIT Cover page and Docs_Alkiviades David.pdf
 - (iii) LAWSUIT mage_evidence_Alkiviades David.pdf
 - (iv) LAWSUIT Claim Form (6).pdf
 - (v) LAWSUIT Further Exhibits.pdf
 - (vi) Particulars of Claim QR Code (incorporating exhibits).

6. The documents were served personally by myself, to the Defendant (in person) at the following address: DORDICK LAW CORPORATION, 509 S. Beverly Drive, Beverly Hills, CA 90212
- 7.
8. which is the last known address of the Defendant and is believed to be their current place of business.
9. I believe that service has been duly effected in accordance with the procedural rules and applicable international treaties/laws.

Statement of Truth

I believe that the facts stated in this Affidavit are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised by the Claimant to sign this Statement of Truth.

Name and position:

Signed: *Martin Wilson*

Dated: 19th May 2025

Place: Los Angeles



High Court of Justice – Antigua and Barbuda

Case No: ANUHCV2025/0149

BETWEEN :-

Alkiviades David

Claimant

-and-

EBBY S. BAKHITAR

Defendant

STATEMENT of SERVICE

I, Martin Wilson, Process Server are currently employed by Kent Legal UK, my place of work is at 8th St, Los Angeles, CA 90014, USA I will say as follows.

1. I am of over 18 years of age.
2. I am authorised to make this Affidavit on behalf of the Claimant in this action.
3. I make this Affidavit from my own knowledge except where stated otherwise.
4. I make this affidavit in support of the personal service of proceedings upon the Defendant at 3435 Wilshire Blvd, Ste 1669, Los Angeles, CA 90010-2287
5. On 18 May 2025, I caused to be served upon the Defendant EBBY S. BAKHITAR the following documents:
 - (i) LAWSUIT Authorization codes.pdf
 - (ii) LAWSUIT Cover page and Docs_Alkiviades David.pdf
 - (iii) LAWSUIT mage_evidence_Alkiviades David.pdf
 - (iv) LAWSUIT Claim Form (6).pdf
 - (v) LAWSUIT Further Exhibits.pdf
 - (vi) Particulars of Claim QR Code (incorporating exhibits).

6. The documents were served personally by myself, to the Defendant (in person) at the following address: 3435 Wilshire Blvd, Ste 1669, Los Angeles, CA 90010-2287
7. which is the last known address of the Defendant and is believed to be their current place of business.
8. I believe that service has been duly effected in accordance with the procedural rules and applicable international treaties/laws.

Statement of Truth

I believe that the facts stated in this Affidavit are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised by the Claimant to sign this Statement of Truth.

Name and position:

Signed: *Martin Wilson*

Dated: 19th May 2025

Place: Los Angeles



Certificate of service

Name of court	Claim No.
Name of Claimant	
Name of Defendant	

On what day did you serve? / /

The date of service is / /

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

On whom did you serve?

(If appropriate include their position e.g. partner, director).

How did you serve the documents?

(please tick the appropriate box)

- by first class post or other service which provides for delivery on the next business day
- by delivering to or leaving at a permitted place
- by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify)
-
- by other means permitted by the court (please specify)
-
- by Document Exchange
- by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)
- by other electronic means (.....time sent, where document is other than a claim form) (please specify)
-

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the claimant's defendant's
 solicitor's litigation friend

- usual residence
- last known residence
- place of business
- principal place of business
- last known place of business
- last known principal place of business
- principal office of the partnership
- principal office of the corporation
- principal office of the company
- place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
- other (please specify)

I believe that the facts stated in this certificate are true.

Full name

Signed Position or office held

(Claimant) (Defendant) (solicitor) (litigation friend)

(If signing on behalf of firm or company)

Date / /

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

High Court of Justice – Antigua and Barbuda

Case No: ANUHCV2025/0149

BETWEEN :-

Alkiviades David

Claimant

-and-

Attorneys & Cartel Operators

1. Lisa Bloom
2. Joseph Chora
3. Nathan Goldberg
4. Renee Mochkatel
5. Dolores Leal
6. Carole Lieberman
7. Louis Freeh
8. Robert Shapiro
9. Eric Wexler
10. Fred Heather

Plaintiffs Identified in Fraudulent / Coordinated Claims

1. Elizabeth Taylor
2. Mahim Khan
3. Lauren Reeves
4. Chasity Jones
5. Marguerita Nichols (Jane Doe)

Judicial Machinery / Forums (Service via Clerk of Court)
Los Angeles Superior Court Judges

- Michelle Williams
- Terry Green

- Christopher Lui
- Rafael Ongkeko
- Yolanda Orozco
- Thomas Falls

California Court of Appeal – Second District

- Elwood Lui (Presiding Justice, retired)

Media Corporations & Executives

- Paramount Global
Office of the CEO: George Cheeks / Brian Robbins / Chris McCarthy
- CBS Interactive
Jim Lanzone
- Red Ventures
- CNET
- Disney
- ABC
- Vivid Entertainment
- Warner Music Group
- Vivendi
- Universal Music Group
- Sony Music
- Sony Pictures
Ravi Ahuja
- Fox Corporation
Lachlan Murdoch
- News Corp
- Comcast
Brian L. Roberts
- NBCUniversal
- Sipur Entertainment (Israel)

Financial Institutions & CEOs

- Bank of America – Brian Moynihan

- Wells Fargo – Charles Scharf
- Deutsche Bank – Christian Sewing
- Citibank – Jane Fraser
- JPMorgan Chase – Jamie Dimon
- HSBC – Noel Quinn
- Credit Suisse (now UBS) – Sérgio Ermotti / Ulrich Körner (former)
- Prudential – Charles Lowrey
- ICICI Prudential – Anup Bagchi

Enforcers / Fixers

- Anthony Pellicano (Los Angeles)

STATEMENT of SERVICE

I, Martin Wilson, Process Server are currently employed in this matter to effect service by Kent Legal UK, my place of work is at 8th St, Los Angeles, CA 90014, USA I will say as follows.

1. I am of over 18 years of age.
2. I am authorised to make this Affidavit on behalf of the Claimant in this action.
3. I make this Affidavit from my own knowledge except where stated otherwise.
4. I make this affidavit in support of the personal service of proceedings upon the Defendants listed in EXH A attached
5. The following documents:
 - (i) LAWSUIT Authorization codes.pdf
 - (ii) LAWSUIT Cover page and Docs_Alkiviades David.pdf
 - (iii) LAWSUIT mage_evidence_Alkiviades David.pdf
 - (iv) LAWSUIT Claim Form (6).pdf

- (v) LAWSUIT Further Exhibits.pdf
- (vi) Particulars of Claim QR Code (incorporating exhibits).

6. I believe that service has been duly affected in accordance with the procedural rules and applicable international treaties/laws.

Statement of Truth

I believe that the facts stated in this Affidavit are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised by the Claimant to sign this Statement of Truth.

Name and position:

Signed: *Martin Wilson*

Dated: 01st November 2025

Place: New York



Exhibit A - Service Addresses:

1) ATTORNEYS & RELATED OPERATORS — Service Addresses (firm / employer)

- **Lisa Bloom**
The Bloom Firm, P.C.
Address: 20700 Ventura Blvd., Suite 301, Woodland Hills, CA 91364
- **Joseph Chora**
Chora Young LLP (or counsel of record)
Address: 650 Sierra Madre Villa Ave., Suite 304, Pasadena, CA 91107
- **Nathan Goldberg**
(Serve via counsel / firm — if representing Allred matters serve Allred firm)
Suggested service: **Allred, Maroko & Goldberg / Gloria Allred related office**
Address: 6300 Wilshire Blvd., Suite 1500, Los Angeles, CA 90048
- **Renee Mochkatel**
(Serve via counsel/firm)
Suggested service: Rust, Armenis & Schwartz (or counsel of record)
Address: 15760 Ventura Blvd., Suite 700, Encino, CA 91436
- **Dolores Leal**
The Law Offices of Dolores Leal (or counsel of record)
Address: 611 West 6th St., Suite 1675, Los Angeles, CA 90017
- **Dr. Carole Lieberman (psychiatry)**
Professional office (serve via practice or via counsel)
Address: 435 North Bedford Drive, Suite 406, Beverly Hills, CA 90210
- **Louis Freeh**
Freeh Sporkin & Sullivan LLP (or Freeh Group addresses)
Address: 1055 Thomas Jefferson St NW, Suite 204, Washington, DC 20007
- **Robert Shapiro**
Glaser Weil LLP (or counsel of record)
Address: 10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067
- **Dr. Eric Wexler (psychiatry / UCLA-affiliated)**
Serve via UCLA Health Risk Management / legal counsel for service.
Address for service: UCLA Health Risk Management, 10920 Wilshire Blvd., Suite 700, Los Angeles, CA 90024
(Alternatively: serve via UCLA Health legal counsel / Office of General Counsel at UCLA)

- **Fred Heather**
(If counsel at Gibson Dunn or related firm): Gibson, Dunn & Crutcher LLP
Address: 3161 Michelson Drive, Irvine, CA 92612
- **Anthony Pellicano** (enforcer/fixer)
Serve via known business / counsel address (public):
Address: 9601 Wilshire Blvd., Suite 1200, Beverly Hills, CA 90210
(If represented, serve the attorney of record.)

2) PLAINTIFFS (serve via their counsel / attorney of record; if unknown, serve via Clerk)

- **Elizabeth Taylor** — Serve via counsel of record; if represented by Gloria Allred / firm:
Address: Allred, Maroko & Goldberg (or counsel of record) — 6300 Wilshire Blvd., Suite 1500, Los Angeles, CA 90048
- **Mahim Khan** — Serve via counsel (e.g., The Bloom Firm if represented):
Address: The Bloom Firm, P.C., 20700 Ventura Blvd., Suite 301, Woodland Hills, CA 91364
- **Lauren Reeves** — Serve via counsel of record (e.g., The Bloom Firm): same as above
- **Chasity Jones** — Serve via counsel of record (e.g., Chora Young LLP): 650 Sierra Madre Villa Ave., Suite 304, Pasadena, CA 91107
- **Marguerita Nichols (Jane Doe)** — If counsel of record (Tom Girardi previously represented), serve via counsel; otherwise:
Clerk of Court (LA Superior Court) — service via court clerk (address below)

If plaintiff counsel is not listed or is in dispute, effect service through the Clerk of the Court handling the action (see Court addresses section).

3) JUDICIAL MACHINERY / FORUMS — Service via Clerk of Court

Los Angeles Superior Court (Clerk for service on matters within LA Superior)
Stanley Mosk Courthouse
111 North Hill Street
Los Angeles, CA 90012

California Court of Appeal — Second District (Clerk for service)
300 South Spring Street
Los Angeles, CA 90013

Note: Judges (Michelle Williams, Terry Green, Christopher Lui, Rafael Ongkeko, Yolanda Orozco, Thomas Falls, Elwood Lui) are NOT personally served; filings and any service are routed through the court clerk and proper court processes.

4) MEDIA CORPORATIONS & EXECUTIVES — Registered Agent / Corporate Service (U.S.)

For corporations, the safe method is service on the **Registered Agent (RA)** in the state of incorporation or via CT/CSC as the corporate RA where applicable.

- **Paramount Global**
Registered Agent: CSC – Corporation Service Company (or state-specific RA)
Suggested RA address (CA/NY filings): 2710 Gateway Oaks Dr., Suite 150N, Sacramento, CA 95833
(Also service at Paramount Global HQ for business address: 555 Fifth Avenue, New York, NY 10017)
- **CBS Interactive / CNET**
Registered Agent: CT Corporation System
RA address: 330 N. Brand Blvd., Suite 700, Glendale, CA 91203
(Corporate HQ: 51 W. 52nd St., New York, NY 10019 — use RA for formal service.)
- **Red Ventures**
Registered Agent: CT Corporation System (or local RA)
RA address: 330 N. Brand Blvd., Suite 700, Glendale, CA 91203 (use RA service)
- **CNET** (see CBS Interactive above)
- **Disney / ABC**
Registered Agent: CT Corporation System
RA address: 818 W. 7th St., Suite 930, Los Angeles, CA 90017
- **Vivid Entertainment**
Serve at corporate office: 3599 Cahuenga Blvd. West, Suite 400, Los Angeles, CA 90068
- **Warner Music Group / Universal Music Group / Sony Music**
Registered Agent: CT Corporation System (use RA)
RA address: 330 N. Brand Blvd., Suite 700, Glendale, CA 91203
- **Vivendi** (U.S. registered presence) — service via registered agent or corporate counsel (use local RA)
- **Fox Corporation**
Registered Agent: CSC – Corporation Service Company
RA address: 2710 Gateway Oaks Dr., Suite 150N, Sacramento, CA 95833
- **News Corp**
Registered Agent: CSC or CT Corporation (use RA for the state of service)
- **Comcast / NBCUniversal**
Registered Agent: CT Corporation System
RA address: 818 W. 7th St., Suite 930, Los Angeles, CA 90017
- **Brian L. Roberts (Comcast)** — Serve corporate matters via Comcast’s registered agent above or Comcast Corp HQ: Comcast Center, 1701 John F Kennedy Blvd, Philadelphia, PA 19103

- **Sipur Entertainment (Israel)** — Serve via corporate HQ/registered foreign agent; use international service via Hague Convention or local Israeli agent (use counsel to effect service)
- **Sony Pictures Entertainment** (Ravi Ahuja office) — service via RA (CT Corp): 330 N. Brand Blvd., Suite 700, Glendale, CA 91203 (or Sony Pictures HQ: 10202 Washington Blvd., Culver City, CA 90232)

5) FINANCIAL INSTITUTIONS — HQ (service via Registered Agent / Corp Counsel acceptable)

- **Bank of America** (Brian Moynihan) — Bank of America Corporate Center, 100 N. Tryon St., Charlotte, NC 28255 (or service via Bank of America Corporation Registered Agent in relevant jurisdiction)
- **Wells Fargo** (Charles Scharf) — Wells Fargo HQ, 420 Montgomery St., San Francisco, CA 94104
- **Deutsche Bank** (Christian Sewing) — Deutsche Bank AG US offices: 1 Columbus Circle, New York, NY 10019 (use RA / counsel as appropriate)
- **Citibank** (Jane Fraser) — Citigroup Center, 399 Park Ave., New York, NY 10022
- **JPMorgan Chase** (Jamie Dimon) — JPMorgan Chase Tower, 383 Madison Ave., New York, NY 10179
- **HSBC** (Noel Quinn) — HSBC North America HQ: 452 Fifth Ave., New York, NY 10018
- **UBS / Credit Suisse** (Sergio Ermotti / Ulrich Körner (former)) — UBS Americas HQ: 1285 Avenue of the Americas, New York, NY 10019
- **Prudential** (Charles Lowrey) — Prudential Financial, 751 Broad St., Newark, NJ 07102
- **ICICI Prudential** (Anup Bagchi) — Serve at ICICI Prudential corporate address in India or via RA in the jurisdiction where suit is filed (use international service rules)

6) ENFORCERS / FIXERS

- **Anthony Pellicano** — Public business / counsel address (use counsel of record if he is represented): 9601 Wilshire Blvd., Suite 1200, Beverly Hills, CA 90210 (public-facing address historically associated; always attempt service via attorney of record first)



CRIMINAL COMPLAINT & EVIDENCE BUNDLE

To: Criminal Investigations Department (CID), Royal Police Force of Antigua and Barbuda

From: Alkiviades (Alki) David

Date: 27 March 2026

EXECUTIVE SUMMARY

This non-political complaint requests investigation into perverting the course of justice and conspiracy to pervert the course of justice.

An ABS broadcast publicly described active litigation as fabricated, a fishing expedition, and extortion, while proceedings were ongoing before Justice Rene Williams.

The matter involves overlapping proceedings in Antigua, the United Kingdom, and California.

EXHIBIT A – ABS BROADCAST

Broadcast naming the Complainant and describing litigation as a 'total fabrication', 'fishing expedition', and 'extortion strategy'.

Statements attributed to local sources and the Leader of the Opposition.

Narrative repeated twice at the conclusion, conveying the claim was fabricated.

Request: CID to obtain full unedited broadcast recording.

EXHIBIT B – 16 JANUARY 2026 HEARING TRANSCRIPT

Before Justice Rene Williams in Claim No. ANUHCV2025/0149.

Shows active court proceedings, jurisdiction arguments, and references to parallel cases in London and California.

Exhibit C – Court Order

outside of Antigua and Barbuda.

2. The allegations contained in the claim disclose a reasonable cause of action in accordance with the laws of Antigua and Barbuda against the Defendants.

IT IS HEREBY ORDERED THAT:

1. The Claimant and the Honourable Attorney General (as amicus) shall by 15th December 2025 file submissions on whether:
 - A. The court has jurisdiction in the circumstances where none of the defendants appear to reside within the jurisdiction and most of the allegations in the claim appear to relate to acts occurring outside of Antigua and Barbuda.
 - B. The allegations contained in the claim disclose any reasonable causes of action in accordance with the laws of Antigua and Barbuda against the Defendants.
2. The Claimant is barred from filing any other documents in this matter except for the written submissions required by this order, and the Court Office shall refuse to accept the filing of any other documents by the Claimant without leave of this court.
3. The matter is adjourned to 16th January 2026 for further hearing.
4. The shall have carriage of this order.

BY THE COURT
REGISTRAR

Rene Williams
Approved
7.11.2025

THE EASTERN CARIBBEAN

Exhibit D – Court Order

except for the v
Office shall ref
Claimant without

3. The matter is adj
4. The shall have ca

Rene Williams
Approved
7.11.2025

Exhibit D

Exhibit E – Court Order

**THE EASTERN CARIBBEAN SUPREME COURT
IN THE HIGH COURT OF JUSTICE**

**ANTIGUA AND BARBUDA
CLAIM NOS. ANUHCV2025/0149**

BETWEEN:

ALKIVIADES DAVID

Claimant

And

- 1. DAVID BOIES**
- 2. GLORIA ALLRED**
- 3. DANI PERETZ**
- 4. SHARI REDSTONE**
- 5. DAPHNE BARAK**
- 6. MICHEAL AVENATTI**
- 7. TOM GIRADI**
- 8. BLACK CUBE LTD**
- 9. LIMEWIRE NFT HOLDINGS**
- 10. EDGAR BRONFMAN**
- 11. JOHN BRANCA**
- 12. JOHN MCCLAIN**
- 13. DOES 1-100**

Defendant

SETTLED DRAFT ORDER

**BEFORE: THE HONOURABLE JUSTICE RENE WILLIAMS (IN
CHAMBERS)**

DATED : THE 29th DAY October 2025

ENTERED : THE DAY 2025

APPEARANCES :

UPON THIS CLAIM filed herein on 17th April 2025

AND UPON THE COURT being concerned as to whether:

1. The court has jurisdiction in the circumstances where none of the defendants appear to reside within the jurisdiction and most of the allegations in the claim appear to relate to acts occurring

Exhibit F – Court Order

outside of Antigua and Barbuda.

2. The allegations contained in the claim disclose a reasonable cause of action in accordance with the laws of Antigua and Barbuda against the Defendants.

IT IS HEREBY ORDERED THAT:

1. The Claimant and the Honourable Attorney General (as amicus) shall by 15th December 2025 file submissions on whether:
 - A. The court has jurisdiction in the circumstances where none of the defendants appear to reside within the jurisdiction and most of the allegations in the claim appear to relate to acts occurring outside of Antigua and Barbuda.
 - B. The allegations contained in the claim disclose any reasonable causes of action in accordance with the laws of Antigua and Barbuda against the Defendants.
2. The Claimant is barred from filing any other documents in this matter except for the written submissions required by this order, and the Court Office shall refuse to accept the filing of any other documents by the Claimant without leave of this court.
3. The matter is adjourned to 16th January 2026 for further hearing.
4. The shall have carriage of this order.

BY THE COURT
REGISTRAR

Rene Williams
Approved
7.11.2025

EXHIBIT G – CONTESTED DOCUMENT

Document relied upon in proceedings with missing parties.

Request for CID investigation into authorship and origin.

Case Number : ANUHCV2025/0149

IN THE HIGH COURT OF JUSTICE

ANTIGUA AND BARBUDA

Claim No: [To be assigned by Registry]

BETWEEN:

ALKIVIADES DAVID

of SwissX Island, St. John's, Antigua & Barbuda

Claimant

— AND —

1. **DAVID BOIES**, of Boies Schiller Flexner LLP
2. **GLORIA ALLRED**, of Allred, Maroko & Goldberg
3. **DANI PERETZ**, of Geneva, Switzerland & Tel Aviv, Israel
4. **SHARI REDSTONE**, of Paramount Global, and Caribbean Holdings
5. **DAPHNE BARAK**, of Beverly Hills, California and Tel Aviv, Israel
6. **MICHAEL AVENATTI**, formerly of Eagan Avenatti LLP
7. **TOM GIRARDI**, incarcerated at Federal Medical Center, Butner, North Carolina, USA
8. **BLACK CUBE LTD**, an Israeli-owned private intelligence agency based in London and Tel Aviv, Israel
9. **LIMEWIRE NFT HOLDINGS**, with assets and servers in the Caribbean
10. **EDGAR BRONFMAN SR. (Deceased)**, estate with real property in St. Barthélemy
11. **JOHN BRANCA**, of West Hollywood and Jumby Bay, Antigua
12. **JOHN MCCLAIN**, music executive, of Los Angeles and Bahamas
13. **THE EXECUTIVE MEMBERS OF THE UNITED PROGRESSIVE PARTY (UPP)**, Antigua & Barbuda
14. **And DOES 1–100**

Defendants

STATEMENT OF CLAIM

Exhibit G



Submitted Date: 17/04/2025 13:21

Filed Date: 17/04/2025 13:21

Fees Paid: 52.00

EXHIBIT H – CALIFORNIA DEFAULT NOTICE

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SECOND APPELLATE DISTRICT
EVA McCLINTOCK, CLERK

DIVISION 1 March 17, 2026

Ebby S. Bakhtiar
Livingston & Bakhtiar
3435 Wilshire Blvd., Suite 1669
Los Angeles, CA 90010

Gary A. Dordick
Dustin Zal Moaven
Dordick Law Corporation
1122 Wilshire Blvd.
Los Angeles, CA 90017

JANE DOE,
Plaintiff and Respondent,
v.
ALKIVIADES DAVID et al.,
Defendants and Appellants.

B341119 consolidated with B345361
Los Angeles County Super. Ct. No. 20STCV37498

NOTICE TO ALL COUNSEL RE RESPONDENT'S DEFAULT

This form has been mailed to all counsel to advise that counsel for respondent has failed to file a timely respondent's brief and that notice of default has issued.

Counsel for respondent(s) Jane Doe is hereby notified that if the brief is not on file within 15 days after the date of this notice, or good cause shown for relief from default, the appeal will be submitted for decision upon the record and appellant's opening brief. (Cal. Rules of Court, rule 8.220(a)(2).)

Respondent(s) should take note that failure to file a brief will be deemed a waiver of oral argument.

Very truly yours,
Eva McClintock, Clerk

by: _____
Deputy Clerk

cc: James G. Bohm
Cecilia Preciado
File

SIGNED

Alkiviades (Alki) David

27 March 2026



LAW ENFORCEMENT ALERT — URGENT CRIMINAL INVESTIGATION REQUIRED

Dallas Police Department Homicide Unit / Crimes Against Persons Division

Alki David <filmonpersonal@gmail.com>

Sun, Mar 29, 2026 at 2:52 PM

Reply-To: alki@filmon.com

To: Homicide@dpd.dallascityhall.com, Criminal Investigation Department <cidpd@ab.gov.ag>, "Rika A. Bird - Rika Bird & Associates" <rikabirdassociates@gmail.com>, James Bohm <jbohm@aol.com>, Ceci Preciado <cpreciado@bohmwildish.com>, Angelina Dettamanti <adettamanti61717@gmail.com>, Cynthia Lopez <clopez@bohmwildish.com>

Bcc: EP <eightpence@protonmail.com>

LAW ENFORCEMENT ALERT — URGENT INVESTIGATIVE ACTION REQUESTED

Dallas Police Department — Homicide Unit / Crimes Against Persons Division

From: Alkiviades David

Date: 29 March 2026

Location: SwissX Island, St. John's, Antigua and Barbuda

RE: Request for Coordinated Investigation — Suspicious Deaths, Witness Risk, and Potential Evidence Interference (Dallas Nexus)

1. PURPOSE OF THIS ALERT

This is a formal request for review and coordination with the Dallas Police Department Homicide Unit regarding:

- The death of attorney Mark J. Lieberman;
- The death of Aaron "Cain" McKnight in Dallas;
- Potential overlap with witness activity, litigation exposure, and evidence integrity concerns across multiple jurisdictions.

This alert is submitted on the basis of **reasonable grounds requiring investigative verification**, not as a determination of causation.

2. CORE FACTUAL CONTEXT

- Mark J. Lieberman filed a federal RICO action in the Northern District of Texas (Dallas Division) on or about 13 January 2023.
- Shortly thereafter, communications directed to him (as documented in federal filings) were interpreted by him as threatening in nature.
- Lieberman subsequently died under circumstances that, in context, warrant review alongside his litigation activity.
- Aaron "Cain" McKnight died in Dallas in early March 2026 under circumstances publicly described as suspicious.
- McKnight had recently been identified in connection with ongoing litigation and witness-related activity.

These two events, while not asserted as causally linked, present a **temporal and contextual overlap requiring examination**.

3. SUPPORTING INVESTIGATIVE TRIGGERS

The following elements support the need for review:

- Documented litigation activity involving high-value and high-profile disputes;
 - Evidence of potential witness instability or absence in related proceedings;
 - Reports of missing or unrepresented evidential material in parallel cases;
 - Direct communications involving Anthony Pellicano relating to a reported Malibu incident, including CCTV imagery and contemporaneous reporting;
 - Multi-jurisdictional litigation involving overlapping parties and legal exposure.
-

4. WITNESS AND CONTEXTUAL ELEMENTS

The undersigned further reports that:

- Sean Combs is alleged to have relevant connections to matters involving individuals and events referenced in ongoing proceedings;
- Daniel Kapon Jr. and his mother are identified as reported beneficiaries of the Michael Jackson estate and as potential victims and witnesses with direct knowledge of overlapping events.

These matters are presented strictly as:

investigative leads requiring verification, including review of communications, travel records, witness statements, and associated materials.

5. RISK FACTORS

There is a credible risk of:

- Loss or degradation of evidence (devices, communications, CCTV);
 - Incomplete or fragmented evidential records across jurisdictions;
 - Witness vulnerability or reluctance affecting evidentiary clarity.
-

6. ACTIONS REQUESTED

It is respectfully requested that the Dallas Police Department:

1. Review existing case files relating to:
 - Mark J. Lieberman
 - Aaron "Cain" McKnight
2. Assess whether:
 - Any overlap exists in communications, contacts, or timelines;
 - Either individual had connections to ongoing litigation or witness roles.
3. Issue or confirm preservation of:
 - Digital communications
 - Devices and storage media
 - CCTV and location data
4. Conduct or confirm:
 - Interviews of relevant contacts and associates;

- Forensic review of available electronic evidence.

5. Coordinate, where appropriate, with:

- Federal authorities;
 - The Royal Police Force of Antigua and Barbuda (CID);
 - Other jurisdictions where overlapping proceedings are active.
-

7. EVIDENCE AND COOPERATION

A supporting evidentiary bundle is available and can be provided immediately, including:

- Timelines
- Communications
- Litigation references
- Supporting materials relevant to the above matters

The undersigned is available to:

- Provide a sworn statement
 - Participate in interviews
 - Assist investigators fully
-

8. FINAL NOTE

This alert is submitted in good faith and in recognition that:

individually explainable events may, when viewed collectively, warrant coordinated investigative review

No conclusion is asserted beyond the need for verification.

Respectfully submitted,

/s/
Alkiviades David
SwissX Island
St. John's, Antigua and Barbuda
[Contact Details]

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<https://www.wsj.com/us-news/law/california-state-bar-opens-probe-into-gloria-allreds-law-firm-60af9202>

EXCLUSIVE LAW

California State Bar Opens Probe Into Gloria Allred's Law Firm

Allred says her firm 'will not bow down to kings or The Wall Street Journal'

By Khadeeja Safdar [Follow](#)

Updated June 13, 2025 2:31 pm ET



Attorney Gloria Allred said her law firm has had thousands of satisfied clients over nearly 50 years.
JULIA DEMAREE NIKHINSON/ASSOCIATED PRESS

The State Bar of California has opened an investigation into the tactics used by Gloria Allred's law firm in its dealings with clients.

The investigation, prompted by a recent article in The Wall Street Journal, is looking at the issues raised by women who hired the Los Angeles firm to represent them in connection with allegations of sexual misconduct.

THE WALL ST.

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Justice Department Struggles Under Weight of Immigration Crackdown

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it looks safe to use.

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CALIFORNIA

‘Shocking’ Tom Girardi scandal shows need for legal reforms, California chief justice says



As an attorney, Tom Girardi paid well-regarded private judges as much as \$1,500 an hour to help him administer mass tort cases involving thousands of clients. (Irfan Khan / Los Angeles Times)

By Matt Hamilton and Harriet Ryan

Aug. 9, 2022 Updated 6:43 AM PT

The private judging industry needs stronger oversight, California’s chief justice said, [following a Times report last week on the role for-hire judges](#) played in Los Angeles

attorney [Tom Girardi's suspected swindling of clients](#) out of millions of dollars in settlement money.

[Chief Justice Tani Cantil-Sakauye](#) called revelations about the conduct of the retired judges, including a former state Supreme Court justice, “shocking” in a statement to The Times, acknowledging, “There are not adequate safeguards regarding the business of private judging.”



CALIFORNIA

FOR SUBSCRIBERS

Tom Girardi's epic corruption exposes the secretive world of private judges

Aug. 4, 2022

For decades, Girardi paid well-regarded private judges as much as \$1,500 an hour to help him administer mass tort cases involving thousands of clients. The Times described how Girardi traded on the names of these former jurists to deflect questions about missing money and how, in some instances, they aided his misappropriation of client funds.

In one settlement in which a former appellate justice was paid \$500,000 to oversee the distribution of funds, Girardi [managed to divert millions of dollars from a settlement account for questionable purposes](#). A downtown jeweler received \$750,000 for what court records show was the purchase of diamond earrings for Girardi's wife, Erika, of “The Real Housewives of Beverly Hills” fame.

Retired jurists serving as arbitrators and mediators hold an increasingly important and powerful place in the legal system, but their work occurs mostly behind closed doors and is rarely scrutinized by outsiders. Sitting judges answer to the state Commission on Judicial Performance, but private judges are not subject to regulation by a specific government agency.



CALIFORNIA

FOR SUBSCRIBERS

Unraveling the mystery of Erika Jayne's \$800K diamond earrings — and Tom Girardi's finances

Aug. 4, 2022

The [State Bar of California](#) theoretically has jurisdiction over private judges who maintain their law licenses, but the agency acknowledged Monday that it was “not aware of any prior investigations” of them. “There does not appear to be an overarching regulatory framework for private judging or mediation,” the agency said in a statement.

ADVERTISEMENT

Cantil-Sakauye, the chief justice, lamented the “multifaceted victimization of injured people” in the Girardi case. She did not offer a specific course of action to protect the public but suggested that lawmakers in Sacramento should take the initiative.

“I believe the Legislature is the proper authority to regulate the conduct of the mediators,” said Cantil-Sakauye, who announced last month that she plans to retire when her term ends in January.



CALIFORNIA

The ‘Real Housewife’ under real scrutiny: Erika Girardi and the hunt for the missing millions

May 17, 2021

Some in Sacramento say they are prepared to act.

“If I’m reelected, there will be hearings, and there will be legislation,” said State Sen. Tom Umberg (D-Orange), chair of the Senate Judiciary Committee.

He labeled The Times’ findings “stomach-churning” and said, “It’s pretty clear to me that something needs to be done.” Among legislative measures, Umberg floated the possibility of mandatory disclosure of past relationships by an arbitrator or mediator.

Girardi repeatedly drew on the high-priced services of retired jurists affiliated with Irvine-based JAMS, the nation’s largest private arbitration and mediation firm. They included JAMS co-founder and former chief executive John K. Trotter Jr., a retired California appellate justice, and former state Supreme Court justice Edward A. Panelli.

The Times described Panelli’s role in a \$17-million settlement Girardi secured for elderly women who alleged they got cancer from a menopause drug. When some of the women suspected in 2014 that Girardi had not paid them all they were due, his firm blamed Panelli and said the retired justice had ordered them to “hold back” \$1 million. The claim was false, but the jurist did not inform the clients or the trial court and fought a subpoena for months before finally being forced to testify under oath. Only then did Panelli disclose that Girardi was lying.



TELEVISION

Tom Girardi and Erika Jayne: What to know

Feb. 1, 2023

Trotter, the former justice turned JAMS executive, also worked on settlements in which clients accused Girardi of stealing money. In a \$66-million settlement with the maker of the diabetes drug Rezulin, Trotter was appointed in 2005 as the “special referee” overseeing the distribution of money to clients, as well as to Girardi and other lawyers on the case. In the years that followed, more than \$15 million went to Girardi’s jeweler,

for the diamond earrings, and his firm, for supposed expenses. Experts who reviewed financial records for The Times said the pattern of payouts indicated fraud.

Both Panelli and Trotter declined interview requests about their dealings with Girardi. In statements, they said they had limited roles that they carried out ethically. Asked to address the chief justice's comments, JAMS (formerly known as Judicial Arbitration and Mediation Services) reiterated a previously issued statement that its roster of former judges "are expected to adhere to the ethical standards that they swore to uphold under oath."

The outgoing chair of the Assembly Judiciary Committee, Mark Stone (D-Scotts Valley), agreed that the private judges' dealings with Girardi were evidence of an unaddressed problem.

"The fact you have judges with long-standing relationships with an attorney like Tom Girardi and doing things to his benefit and their own personal benefit — there is not currently a structure to hold anybody in those circumstances accountable," said Stone.



CALIFORNIA

For widows, orphans cheated by Tom Girardi, 'Real Housewives' riches add to the pain

May 18, 2021

Stone, who is retiring this year, said he was skeptical of a legislative fix to the problem, given opposition to prior proposed legislation to bring more transparency and public safeguards to the arbitration industry. Those measures, he said, were vigorously contested by corporations and business groups that favor the system that allows them to settle disputes out of public view, adding, "I'm not sure these ethical lapses bother them that much."

“Those are very, very difficult bills to get through the Legislature, because those who stand to benefit from the way the arbitration system works oppose us at every turn, and that is to the detriment of consumers,” Stone said.

A longtime critic of the private judging industry, former Santa Clara University School of Law Dean Gerald F. Uelmen, said it seems reasonable to regulate the private judging industry, but advocates should expect strong opposition from sitting judges, some of whom see private judging — with its cushy salaries — as a retirement plan.

“After years of working ... for just barely reasonable compensation, when they retire, they kind of strike it rich, and they like it,” said Uelmen. “A lot of them are eager to retire and move on to that richer realm — so I think part of the opposition will be from judges who want to do it and see it as a just reward for all their years of hard work.”

More to Read

Tom Girardi – disgraced legal titan, former ‘Real Housewives’ husband – sentenced to 7 years in prison

June 3, 2025



Tom Girardi, 86-year-old disbarred lawyer, begins prison sentence as dementia worsens

July 17, 2025



Tom Girardi’s son-in-law is sentenced in legal fraud scandal

Oct. 7, 2025



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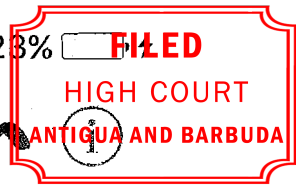
Matt Hamilton

Matt Hamilton is a former reporter for the Los Angeles Times. He won the 2019 Pulitzer Prize for investigative reporting with colleagues Harriet Ryan and Paul Pringle and was part of the team of reporters that won a Pulitzer Prize for its coverage of the San Bernardino terrorist attack. A graduate of Boston College and the University of Southern California, he joined The Times in 2013.



Harriet Ryan

Harriet Ryan is a former investigative reporter for the Los Angeles Times. During her 17 years at the paper, she wrote about high-profile people, including Phil Spector, Michael Jackson and Tom Girardi, and institutions, including USC, the State Bar of California, the Catholic Church, the Kabbalah Centre and Purdue Pharma, the manufacturer of OxyContin. Ryan won the Pulitzer Prize for Investigative Reporting with colleagues Matt Hamilton and Paul Pringle in 2019. She and Hamilton won the Collier Prize for State Government Accountability in 2023. She previously worked at Court TV and the Asbury Park Press. She is a graduate of Columbia University.



Case Number : ANUHCV2025/0149



Elizabeth

+1 (904) 294-3882

Submitted Date: 29/05/2025 11:55

Filed Date: 29/05/2025 11:58

To call them personally

Fees Paid: 22.00

Your attorney?

Gloria Allred (the celebrity attorney)
DONT TELL A SOUL

Whatttt how did you get here, lol I even know who that is

Called her office

I just need inuk and Chasity

I'm sure you will

I honestly hope so

Jun 3, 2015, 4:04 PM

of the following:

You were engaged in a legally protected activity -- such as filing a complaint with the Equal Employment Opportunity Commission or formally complainin



Messages





Elizabeth



+1 (904) 294-3882

No one is willing to be a witness now and Gloria Allred won't take my case if not. If the tables were turned I would have you girls back in a heartbeat. No questions asked. This entire thing just sucks & all leads back to being scared of Alki. Like we make 2,000 a month, it's a joke. I already had a final interview today lol

All I need is Chasity and MK

MK to say he touched her boobs (which she told me she would say)

Chasity (to say she was a witness to the headstand thing)

And just call her office. That's it & both of them are scared of losing their jobs

I can't stop crying

Alki is suing me first

Elizabeth



Message





~~Chasity~~



+1 (904) 294-3882

Elizabeth

Jun 2, 2015, 3:19 PM

Have you ever been a witness to alki doing anything? Or you?



No nothing like what you said he did to you



I don't know about anyone else tho

But the banana thing what was that?

Ohh lol that was way back when he asked if I wanted a banana but tth that's when I was new so I don't know if it was sexual or not

Ok non important lol

Haha yea I wish I had something to help

At least you have mk

They told me I need mk, Carl, and Chasity possibly inuk

To call them personally



Message





chasitycjones@yahoo.com

They called me yesterday

I'm going to call the lawyer back.
That's what Alki get!!!!

Lol

Yea I knew something was up when
MK stopped showing up

I think I'm going to sue him too bc
he deserves it by the way he treat
people and things he do to people

I'm going to call Elizabeth today this
afternoon

Yea if he posted that, it looks like
he's may be worried

Yes

It's not just Elizabeth but MK and
now you lol

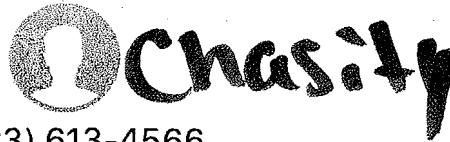
Yes

He is a loser!!!!



Message





1 (323) 613-4566

May 26, 2016, 5:30 PM

I hate FilmOn!!

I'm quitting for sure! They only paid me a part of my commission and Alki agreed to pay me and Peter don't want to pay. Alki said he was going to make sure I get paid but this is not right I have to fight for my money.

I can't believe that...that company is ridiculous...isn't it funny how everyone has trouble getting paid their commissions but that never was a problem for Jill in the UK...makes you wonder

Why

Right!!

Alki should have paid you in full once the deal closed, that's what he did for Nuzzy

She paid herself



Message





Chasity



1 (323) 613-4566

Jul 13, 2016, 9:49 AM

Can you please give me Chasity's number? I need to make her aware of something. Thank you. Hope you're doing well.
 From Elizabeth!!! 🙄🙄🙄

No

I don't want to talk to her.

There is nothing in this world that she can do to me...

I don't ever want to talk to her and please tell her that! There is nothing!!!!!! In this world that she calculus ever do to me and tell her that too!!! And I will file a restraining order against her today if she don't leave me alone. Matter of fact I think I am bc she is crazy and should move on... She is a prostitute and I don't have time with her shit! My mom have stage 4 cancer and one of my fiend just lost her husband and two kids over the weekend in a car accident. I don't give a fuck!! What Elizabeth is



Message



**Chasity**

1 (323) 613-4566

There is nothing in this world that she can do to me...

I don't ever want to talk to her and please tell her that! There is nothing!!!!!! In this world that she calculus ever do to me and tell her that too!!! And I will file a restraining order against her today if she don't leave me alone. Matter of fact I think I am bc she is crazy and should move on... She is a prostitute and I don't have time with her shit! My mom have stage 4 cancer and one of my fiend just lost her husband and two kids over the weekend in a car accident. I don't give a fuck!! What Elizabeth is saying and if she call me I will curse her out and beat her ass with bullshit! In not in the mood! At all

Tell her I said I don't give a fuck about her or her fucking case!

Yea I wasn't gonna give her your number, just thought you should know. You know how she can be so sneaky, i don't even know if lma respond and if I do, I'm gonna say I



iMessage





Chasity



1 (323) 613-4566

Wed, Nov 16, 11:59 AM

What happened with you case? Did you win?

Wed, Nov 16, 3:19 PM

Well the only thing I'm allowed to say is that it's been resolved :/ I can get into a mess if I say anything more

Oh ok

Yea lol...were you able to find out about your pay

Wed, Nov 16, 5:51 PM

Do you mind if I can have your attorneys number?

Thu, Nov 17, 12:41 PM

Hey girl, so my attorney is a criminal law attorney so I'm not sure if he would be the right one. Is it for work or for something else. I asked him and he said he could recommend someone else for you if it's not criminal. He just really took my case



Message





Chasity



1 (323) 613-4566

Wed, Nov 16, 5:51 PM

Do you mind if I can have your attorneys number?

Thu, Nov 17, 12:41 PM

Hey girl, so my attorney is a criminal law attorney so I'm not sure if he would be the right one. Is it for work or for something else. I asked him and he said he could recommend someone else for you if it's not criminal. He just really took my case because it was through a family friend

Ok. I'm going to sue Alki...for harassment. I'm going to go home and find another attorney today and go over all my notes I kept

That whok company is dirty

They are trying to go public and that not fair how he does me and people

I'm going to call and retract my statement from Barry Rotyman too



iMessage





Chasity



1 (323) 613-4566

Did people witness it

What? My lawsuit?!?

Or just in general

Kevin was there

General lawsuits

That's sick

I really can't believe that

As long as there are witnesses it helps your case

How he thinks it's all a joke and can get away with it just cuz he has money

Right

Damn I'm sorry you have to go through that again

I know right

Did he touch you or was it just verbal harassment



Message





Chasity



1 (323) 613-4566

Did you retract your statement that you signed for Barry Rotyman?

I need to retract that statement

What should I do?

Hey Mary, do you mind if I ask you what amount you settled for?

I'm here baby

Sorry that was for khlo'e lol

Fri, Nov 18, 6:29 PM

Hey I really wish I could talk about my case but I'm really not allowed to say anything at all, I could get into some serious mess legally if I were to talk about anything at all about the case...that's why I was saying if I'm subpoena, then I'll be legally able to speak I believe

Ok

Do you think your attorney will be ok if my attorney speaks to him and



Message





Chasity



1 (323) 613-4566

Ok

Do you think your attorney will be ok if my attorney speaks to him and that way you can't talk about it and he will only speak about what is legal and will not get you in any trouble

I don't think it will get that far...it will just be a settlement

He should be able to look it up himself, once a lawsuit is filed, any attorney can look it up. Have you talked with this attorney yet?

Yes today. I'll tell him to look it up

He said he is submitting everything on Monday

That's awesome, so he took your case

That's huge

Yes he did and he said he will get a settlement bc it's so many pending



Message



**Chasity**

1 (323) 613-4566

Mon, Nov 28, 7:28 AM

Good morning Girly, how was holiday? Are you ready for Christmas?

I meet with my attorney last week and he filed paperwork for my case last week. I told him that you couldn't talk to him about your case but he wanted to see if he could just talk to him in general... not about your case at all. Can you please talk to him this week about me? It will be fast and he is just trying to get my case together. If there is any problems which he said it will not hurt you in any way or anything you signed...it's just to help me. He said he don't think we will be going to trial or nothing just a settlement. Thank you

Mon, Nov 28, 11:43 AM

Hi Chasity, I'm so happy you were able to file a case. As much as I want to help you, I'm not allowed to speak on anything regarding filmon or Alki. Even things in general about how it was working there. That's



iMessage





Chasity



1 (323) 613-4566

your case at all. Can you please talk to him this week about me? It will be fast and he is just trying to get my case together. If there is any problems which he said it will not hurt you in any way or anything you signed...it's just to help me. He said he don't think we will be going to trial or nothing just a settlement. Thank you



Mon, Nov 28, 11:43 AM

Hi Chasity, I'm so happy you were able to file a case. As much as I want to help you, I'm not allowed to speak on anything regarding Timon or Aiki. Even things in general about how it was working there. That's part of what I agreed to when everything was resolved. Trust me, I would do everything I could to help you, but if you do settle, you'll understand why I can't speak on anything at all because I think you'll have to sign something saying you won't speak about anything at all if you settle

Ok. Thank you



Message





Chasity



1 (323) 613-4566

Wed, Jan 11, 1:22 PM

Hey girl, so I kind of have bad news... for some reason Alki's attorney thinks I have talked to you about my case, which I haven't, and they contacted my lawyer now and it's a big mess. my attorney has told me to lay low right now, so I promise we will hang out, just until my attorney says I'm okay



Oh wow

He prob got scared bc I'm suing him and my lawyer is not being quiet about it. I'm so 🤔 mad. I was looking forward to seeing you. He knows he is wrong

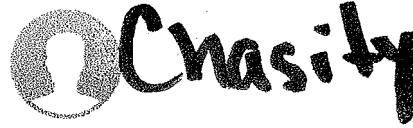
Do you know what they think we are talking about? That's crazy!! I can't believe him

Yea I know, I told my attorney that I haven't told you anything because I'm not allowed to, idk what they are trying to do. I told my attorney we had dinner plans and he told me just for now to stay low. I'm really



Messages





1 (323) 613-4566

Yea I know, I told my attorney that I haven't told you anything because I'm not allowed to, idk what they are trying to do. I told my attorney we had dinner plans and he told me just for now to stay low, I'm really sorry cuz I wanted to see you!

I told him even if we were just hanging out? And he said yea cuz if they ask or find out, they can use that against me and say why would we be hanging out and I not tell you anything about my case, so I just have to be careful, it sucks cuz I thought I was past all this and I know you're going through a lot and I wanted to be there for you

Yes it sucks.

I don't understand why you can talk to me if it's something outside of your case. It doesn't make no sense.

I know...it's cuz if they even ask if we were hanging out, they can say that...



ivwosagic





Chasity



1 (323) 613-4566

I know... it's cuz if they even ask if we were hanging out, they can say that...

In you agreement I'm sure it did not state that you can't talk to me or other things outside of your case.

But your agreement don't say not to talk to me

Technically I can be sued if I told anyone about my case...and if Barry thinks I did say something, he can use me hanging out with you to help build his case

Exactly, I know...

But since you have a lawsuit against him, it looks like we are conspiring

My attorney said not forever, just for the time being...

The problem with this is that we are going to go to court I think like trial so that would be bad for him bc what if we have to subpoena everyone. He is wrong to try to stop



Message





1 (323) 613-4566

The crazy thing is my attorney pulled your case and read your whole case and he talked to your attorney a few times so I'm not sure why he would say that. I know he wants to be safe so maybe that's it. I'm not sure

Yea my attorney told me but the thing is, they are trying to say how would you have even known about my case if I didn't tell you, but every single person there knew! Like come on, everyone knows how he is and how he had multiple cases

My attorney talked to your attorney before so he was aware and that was last year and then all of a sudden.



I knew about your case from Carl Dawson and many people at Filmon knows not you.



And it makes me so mad too cuz I heard through the grapevine that Alki was making fun of my lawsuit with him, so actually he's the one talking about my lawsuit



Message 



chastity



1 (323) 613-4566

And it makes me so mad too cuz I heard through the grapevine that Alki was making fun of my lawsuit with him, so actually he's the one talking about my lawsuit!!

And he's not allowed to just like I'm not

It makes me so mad

Yes he was making fun in front of me and Kevin

Are you serious?

What did he say?

I want to see if it's the same thing I heard

I was told that you settled and that you settled for 500k

Alki said that?

No everyone at FilmOn said it

Wth



Message





Chasity



1 (323) 613-4566

I was told that you settled and that you settled for 500k

Alki said that?

No everyone at FilmOn said it

With

Alki told carl I think or somebody bc I knew you settled a long time ago

Alki was making fun of getting sued. I'm not sure what you settled for but I know it was over 100,000.

What did you hear?

If I tell my attorney this, will you say that you told me?

That you heard Alki making fun of my case and saying that we settled?

If you don't want to, it's okay. It just isn't fair that I'm over here not saying anything and he's over there making fun of my case and saying we settled



Message





Chasity



1 (323) 613-4566

Yea cuz when I said it I said it was another female with me, this was before I even filed

Yes I heard you had proof

lol from who?

Filmon

My attorney read your case. He is going to get Alki for sure. Another thing Carl knows what happened bc he was very detailed about you and Alki

Alki told him

But what Alki said isn't true, unless he admitted to what he did

What did he tell him

Please ask your attorney if you can talk to me and write a statement of what happened to me from Alki and please let her know I will write a statement of what he said in front of me





Chasity



+1 (310) 804-9536

iMessage
Oct 13, 2015, 8:49 PM

I called that attorney Larry ring and he wants me to come in and sue Alki. He said he might just settle and give me money after he send a letter stating I'm suing him. I'm just not sure if I want to sue or not. What do you think? I prob get money but if I come back I can't sue or Wil be scared lol



Damn yea idk

That's what I was gonna say about coming back...

You should ask Elizabeth what happened with hers when you talk to her

Before you tell her you aren't testifying for her 😊

She never called me back.

What's in Dubai?

Idk, Mk probably made that up cuz she turned out to always be lying



Text Message





Chasity



+1 (310) 804-9536

Nov 10, 2015, 5:00 PM

I think Alki is weird. I think he acts weird when I'm around. It's uncomfortable. I feel like he doesn't like me or feel strange when he is around. I was going to talk to him about fergie but don't feel comfortable

Oh, in the morning can you take me to get a cake down the street? Jeff will have my car

Nov 11, 2015, 8:20 AM

Hey yea we can go

Is Benjamin coming today?

Nov 12, 2015, 2:34 PM

Good thing I wasn't single and went out with this guy..we have nothing in common 😂

Lol are you at lunch with him now



No we are at the studio lol



Text Message





Chasity



+1 (310) 804-9536

Nov 23, 2015, 8:27 AM

I'm not coming to work. I'm so unhappy. I have to call Carl and make something up bc my life with jeff is horrible.



Omg I'm so sorry..I'm at my doctors appt but I will call you after

I hope you're okay...

No I'm not. I hate this life with him and I have to get out of it

Everyday we argue and I feel so stupid

Are you home or are you with him now

I'm here at this apartment but I'm about to drive home.

I don't want to marry him. I don't want kids. I don't want a man. I'm so stupid to even try anymore with him

Nov 23, 2015, 9:50 AM





Chasity



+1 (310) 804-9536

Yes, I'm not sure. Elizabeth prob said we all seen it or something. Who know

Yea she probably did, I never did tho

Me either

How is she gonna go to court with no proof? She kind of set herself up to look dumb

Poor girl

I never seen him touch her but she always had something to say about everyone lol

Omg she did! Lol

She liked to gossip

Yep

Even about fake stuff

Lol yes





Chasity



+1 (310) 804-9536

Did they ask you if Elizabeth ask you to file too or to help her case?

Yea but I said no because she didn't



She knew I never saw anything



Ok. They ask me too

I think cuz maybe she can get in trouble

Like they will use it against her

But she asked MK for help and MK jumped on

Right Alki told me that today.

And is getting money

She ask me for help for sure

What that they are using that against her?

Yes

He told me he was filing criminal





Chasity



She ask me for help for sure

What that they are using that against her?

Yes

He told me he was filing criminal charges against her

Damn poor Elizabeth

MK too?

No

You know what's crazy...I still have a text from Elizabeth saying all she needs is MK and you to talk

She ask me to help her case and begged me to help her and kept calling me over and over via text but I'm not sure if she told me to file against him or not bc I wasn't paying attention to her



lol





Chasity

+1 (310) 804-9536

Mar 7, 2016, 8:35 AM

I'm not coming to work.

Are you okay?

I I'm quoting my job

Whatttt

I hope you're okay

I'm really depressed. I'm going to try to come to work

I'm really sorry! Is everything okay with your mom?

She has been sick

I know it's hard...

Is she taking the oil yet?

Yes she started yesterday

That's good, that will really help her appetite



Text Message





Chasity



+1 (310) 804-9536

Mar 8, 2016, 12:59 PM

I left. I don't care if I get fired . I'm going home

I'll call you later

Ok I'm coming back. I'm not going to let him make me mad

Ok are you okay?

Yes I'm ok

I just need to learn how to ignore him

Mar 9, 2016, 9:09 AM

I have to drop off khlo'e laptop. She forgot it. I'll be in right after if anyone ask

If not lol I'll see you soon

Ok I will let him know

Mar 12, 2016, 10:07 AM



Compose



Inbox 356,247

Starred

Snoozed

Important

Drafts 2,423

Purchases 2,685

More

Labels

[imap]/Drafts

CEO@ETV.COM 2

FilmOn

Investors

KB JUDGES LISTINGS 1

Notes

Office 47

PAYPAL 11,309

FilmOn Office

SUBS

SUPPORT 47,078

VARIETY 83

More

Re: Confirmation of Affidavit Content



Carl Dawson <carlvdawson@gmail.com>

to alki, me, Carl

Re: Confirmation of Affidavit Content

Dear Alki,

I have reviewed the draft of my affidavit intended for submission to the F

I can confirm that the document accurately reflects my previous stateme

Having reviewed the affidavit in full, I am satisfied that it truthfully repres

Many thanks,

Carl Dawson

818-581-9803

carlvdawson@gmail.com

On Sat, Jul 12, 2025 at 7:57 AM Alki David <filmonpersonal@gmail.com

Dear Carl,

I hope this message finds you well.

Please find below the draft version of your affidavit intended for submi including your remarks regarding Ms. Marguerita Nichols and the broc

Kindly review the affidavit in full and confirm whether the content accu

Once approved, I will proceed with including your signed declaration e

Your support in this matter is deeply appreciated.

Warm regards,

Alkiviades David

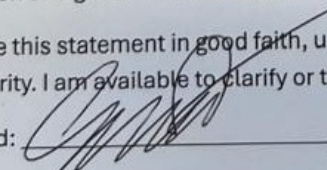
Defendant, Pro Se

STATEMENT OF TRUTH - GARY SHOEFIELD RE: KAHN Vs David

I, Gary Shoefield, of sound mind and under no duress, make the following statement freely and truthfully. I understand that this statement may be used in legal proceedings and I confirm that the facts stated herein are true to the best of my knowledge and belief.

1. I was named in connection with the legal proceedings involving Mahim Khan vs. Alkiviades David, including in the appellate ruling authored by Justice Elwood Lui. I wish to clarify that I never testified in court in this matter and did not submit sworn evidence that was cross-examined.
2. I did not witness any inappropriate behavior by Mr. David toward Ms. Khan or anyone else. I did not observe any acts that would support the allegations made against him.
3. I did not experience or perceive a toxic workplace environment while working in the professional settings associated with Mr. David or his companies.
4. I was invited to meet with Gloria Allred and members of her legal team, where I was pressured to say things I knew to be false, specifically that I witnessed Mr. David "grab Mahim Khan's genitals." I refused to say this, as it is not true.
5. I told Ms. Allred's team that I had no direct knowledge of the allegations and would not support them. Following that meeting, I was effectively dismissed and excluded from further involvement.
6. I wish to clarify that I do not believe Mahim Khan was acting maliciously. In my opinion, she is generally a nice person, but I believe she was under pressure from her attorneys to pursue claims that may not have been her own words or experiences. It is my view that she was coerced or manipulated by those representing her.
7. My name was cited or implied in appellate documents in a way that misrepresents my position and gives the false impression that I supported the claims against Mr. David. I do not.

I make this statement in good faith, understanding that it may be submitted to a court or regulatory authority. I am available to clarify or testify under oath if required.

Signed: 

Name: Gary Shoefield

Date: 7/8/25

Statement of Truth:

I believe that the facts stated in this witness statement are true.

Signed: 

See Attached
7/9/2025

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

Claim No: KB-2025-001991

AFFIDAVIT OF ELANE CALENDAR aka YELENA CALENDAR

In support of the Defendant, Mr. Alkiviades David

I, Elane Calendar, also known as Yelena Calendar, of sound mind and over the age of eighteen (18), do hereby affirm and declare as follows:

1. Identity and Employment Background

1.1. My legal name is **Elane Calendar**, and I was professionally known as **Yelena Calendar** during my employment at FilmOn TV and ADP (Alki David Productions).

1.2. I was employed by ADP and FilmOn TV from **2011 through 2016**, where I served as a **Financial Controller**, overseeing financial and personnel matters.

1.3. I worked closely with Mr. Alkiviades David and was responsible for aspects of staff support, payroll, HR oversight, and budgeting across departments.

2. Observations of Mr. David's Conduct as an Employer

2.1. I worked closely with Mr. David for many years and attest to his kind, generous, and professional conduct as an employer.

2.2. He routinely offered private health insurance to staff, even though this was not legally required of a company of that size in California.

2.3. He consistently supported staff with flexible working arrangements, including time off for personal or medical reasons.

2.4. He treated both male and female staff members with equal respect and gave many junior employees their first break in the entertainment industry.

2.5. Mr. David truly demonstrated an extraordinary level of care for the people who worked for him. When an employee faced sudden heart pain, Mr. David rushed the employee to the hospital ER, covering all the bills himself and saving him from a heart attack. This quiet act of immense kindness was done without any publicity or expectation of recognition.

2.6. He also understood the personal struggles his employees faced, offering a helping hand through flexible work arrangements and financial aid when they needed it most. While his

generosity may have occasionally been taken advantage of, his heart was always in the right place, striving to make a real difference for his team.

3. Clarification on Legal Involvement

- 3.1. I have never appeared in any court—whether in person, virtually, or via written declaration—in relation to any case involving **Mahim Khan and Mr. Alki David**.
- 3.2. To my knowledge, I was never contacted by any party or representative from either side regarding the Mahim Khan matter.
- 3.3. I want to respectfully but firmly state that I was **not present at nor did I participate** in the Mahim Khan trial.
- 3.4. Although my name might have been referenced in other separate and concluded situations, my **unwavering view is that Mr. David is a sincere and principled employer**, and I do not endorse any adverse claims against him.
-

4. Statement of Willingness

- 4.1. I am willing to provide further testimony or clarification in this matter and am available to appear before a UK court should that become necessary.
-

I affirm that the foregoing is true and correct to the best of my knowledge and belief.

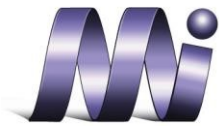
Executed on this day: [Insert Date]

Signed:

Elane Calendar

07/15/2025

Elane "Yelena" Calendar



Self Referral

Name: David, Alkiviades
MRN #: 376807
DOB: 05/23/1968
Exam Date: 04/01/2023 17:26
Referring Phys.: Self Referral

MRI OF THE BRAIN WITHOUT CONTRAST

HISTORY

This is a 54-year-old male with a history of head trauma. The patient has memory loss.

TECHNIQUE

This study was performed at Medical Imaging Center of Southern California, Santa Monica.

Using a 3 Tesla Siemens Verio MRI Open system, the following sequences were obtained:

- 1) Localizer.
- 2) T1-weighted 3D MPRAGE.
- 3) T2 TSE axial.
- 4) 3D double inversion recovery.
- 5) T2 FLAIR sagittal, axial, and coronal.
- 6) DWI axial.
- 7) SWI axial.

FINDINGS

There is a large focal area of encephalomalacia with associated white matter gliosis in the medial frontal lobe on the left. There is considerable volume loss and encephalomalacia, which will be better evaluated on the advanced imaging study Neuroquant report. This likely is an injury of some longstanding.

The remainder of the gray matter, white matter, brainstem, and cerebellum are normal.

There is mucoperiosteal thickening and opacification of the right anterior ethmoidal air cells.

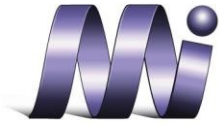
The extracranial soft tissues, sinuses, and skull base structures are otherwise normal.

IMPRESSION

- 1. Significant left frontal encephalomalacia with gliosis in the deep white matter involving the paramedian frontal lobe.
- 2. There is frontal volume loss, greater on the right than on the left.
- 3. There is opacification of the right frontal ethmoidal sinus.

summary pages





MEDICAL IMAGING

Center of Southern California

Bradley A. Jabour, M.D., Chief of Radiology

Bradley A. Jabour, M.D.

Senior Member of ASNR

Signed Date: 04/05/2023 05:15 PM



SMART HEART AND HEALTH
Preventive Imaging

Santa Monica
2811 Wilshire Blvd., Ground Floor
Santa Monica, CA 90403
Tel: (310) 829-9788 Fax: (310) 829-4828
Beverly Hills
8727 Beverly Blvd.,
Los Angeles, CA 90048
Tel: (424) 355-0433 Fax: (866) 412-7220



SMART BRAIN AND HEALTH
Advanced Brain Therapeutics



Self Referral

Name: David, Alkiviades
MRN #: 376807
DOB: 05/23/1968
Exam Date: 04/01/2023 17:26
Referring Phys.: Self Referral

NEUROQUANT VOLUMETRIC ANALYSIS

HISTORY

This is a 54-year-old male with a history of head trauma. The patient has memory loss.

TECHNIQUE

This study was performed at Medical Imaging Center of Southern California, Santa Monica.

Using a 3T Siemens Scanner, the following sequences were obtained:

- 1) 3D MPRAGE.
- 2) Volumetric Analysis using FDA-approved techniques.

FINDINGS

There is considerable bilateral volume loss in the temporal lobes two standard deviations below normal. This finding is also seen in the lateral occipital lobes.

There is significant volume loss in the right superior frontal lobe 7th percentile as well as in the cortical gray matter, right worse than left.

OVERALL IMPRESSION

In evaluating the patient's MRI studies, it is clear that there is significant post traumatic change in the left frontal lobe where there is diminished perfusion on the ASL, diminished volume on the Neuroquant study. This patient may benefit from TMS using Neuronavigation.

summary pages

Bradley A. Jabour, M.D.
Senior Member of ASNR

Signed Date: 04/05/2023 05:15 PM

