

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

ALKIVIADES DAVID

Plaintiff(s)

-v-

JOSEPH CHORA

Defendant(s)

CIVIL COMPLAINT

CASE NO.

JURY TRIAL DEMAND

JURISDICTIONAL STATEMENT

Jurisdiction is essentially the authority conferred by Congress to decide a given type of case one way or the other. See - *The Fair v. Kohler Die Co.*, 228 U.S. 22, 25 (1913). The instant lawsuit unambiguously sets out a controversy between a citizen from the Union state of California and, in part a citizen of a foreign state who is not lawfully admitted for permanent residence in the United States, and more specifically the United Kingdom for the purpose of the Court's diversity jurisdiction under 28 U.S.C. § 1332(a)(2). The controversy further involves the monetary damages as alleged in the Complaint which exceeds \$75,000 USD for invocation of the federal court's jurisdiction under 28 U.S.C. § 1332(a). Moreover, and pursuant to 28 U.S.C. § 1367(a) federal courts routinely exercise supplemental jurisdiction over state-law claims when the claims are closely related. Factual predicates of the allegation for the purpose of the Court's supplemental jurisdiction as set out in pages

1 4-17 to the Complaint, fall within the ambit of a closely related state law claim and
2 more specifically the cognizable California torts of TRESPASS TO CHATTEL;
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4 CONVERSION; INVASION OF PRIVACY; AND INTENTIONAL INFLICTION
5 OF EMOTIONAL DISTRESS, whereas the United States District Court for The
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7 Central District of California has jurisdiction over all matters of facts and law
8 pertaining to this cause.

10 VENUE

11 Venue is invoked pursuant to 18 U.S.C. § 1965(a)¹ in that the Defendant
12
13 resides or, can be found or, transacts his affairs in the Central District of California.

15 RELATED CASES PURSUANT TO LOCAL RULE 3.3

17 **Cases indirectly related to the instant lawsuit:**

18 **State Cases:**

19 SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF
20 LOS ANGELES CENTRAL DISTRICT

21 **LAUREN REEVES v. HOLOGRAM USA INC ET AL**

22 BC643099

23 December 07, 2016

24
25 ¹ 18 U.S.C. 1965(a) Any civil action or proceeding under this chapter against any person may be
26 instituted in the district court of the United States for any district in which such person resides, is
27 found, has an agent, or transacts his affairs.

1 Judge: Terry Green

2 Closed

3 SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY
4 OF LOS ANGELES CENTRAL DISTRICT

5 **MAHIM KHAN v. HOLOGRAM USA INC ET AL**

6 BC654017

7 Gloria Allred (Att)

8 Filed 3/14/2017

9 Judge: Michelle Williams Court

10 Closed

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY
12 OF LOS ANGELES CENTRAL DISTRICT

13 **ELIZABETH TAYLOR / CHASITY JONES v. ALKIVIADES DAVID ET AL**

14 BC649025

15 Gloria Allred (Att)

16 Lisa Bloom / Joseph Chora (Att)

17 Date Filed: Feb 02, 2017

18 Judge: Rafael A. Ongkeko

19 Judge: Yolanda Orozco

20 Closed

21 SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY
22 OF LOS ANGELES CENTRAL DISTRICT

23 **JANE DOE v. ALKIVIADES DAVID, ET AL.**

24 Marguerita Nichols

25 BC643099 / 20STCV37498

26 Sep 30, 2020

27 Thomas Girardi / Allred (Att.)

28 Judge Christopher K. Lui

Pending

ABOUT THE PLAINTIFFS

1. Plaintiff ALKIVIADES DAVID, known from hereinafter as David or the
Plaintiff, is a billionaire businessman and a natural person, domiciled in the state of

1 California during all times relevant, and a citizen of the United Kingdom. David
2 resides at 23768 Malibu Road, Malibu, California, 90265. David suffers from an
3
4 intermittent neural disorder that has been diagnosed and is cognizable as a disability
5 for the purpose and protections under the American Disability Act (ADA).
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7 **ABOUT THE DEFENDANT**

8 2. Defendant JOSEPH CHORA known from hereinafter as CHORA, is a natural
9 person and a resident of the State of California. Chora is a natural person and a
10 citizen of the United States of America who conducts his affairs at 650 Sierra Madre
11 Villa Ave, Ste 304, Pasadena, CA 91107-2071.
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13 3. CHORA is the collection agent for a corrupt ring of civil litigation lawyers to
14 include but not limited to federal criminal defendant THOMAS GIRARDI.
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16 **SUMMARY OF THE CASE**

17 4. Upon information and belief, the defendant who is a lawyer and member of
18 the California State Bar, has for many years acted in concert with, and has performed
19 the task of “Enforcer” for a ring of corrupt California attorneys to include but not
20 limited to the now disgraced Thomas V. Girardi, Gloria Allred, and Lisa Bloom.
21 Defendant has operated the criminal, debt collection arm of the Girardi crime ring
22 under the guise of legitimate civil court processes, to include but not limited to civil
23 enforcement proceedings before various domestic and international courts. The
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1 Plaintiff is but one of numerous victims left in the wake of the crime spree
2 perpetrated by the above named ring of criminals acting as lawyers.
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4 **RELEVANT FACTS**

5 5. On January 13, 2023, David filed a (40) forty-page civil racketeering lawsuit
6 under the federal (RICO) statutes in the United States District Court for the Northern
7 District of Texas, Dallas Division, case number 3:23-cv-00108-L.
8

9 6. The lawsuit was filed by Texas attorney MARK J. LIEBERMAN, and alleged
10 specified racketeering activities against the instant defendant and (16) additional
11 parties to include THOMAS GIRARDI, GLORIA ALLRED, and LISA BLOOM.
12 The federal racketeering lawsuit pleaded *inter alia* a variety of frauds to include but
13 not limited to mail fraud and wire fraud as each offense related to fraud, money
14 laundering, extortion, and the bribery of judicial officers.
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18 7. On January 24, 2023, the defendant communicated a verbally threatening
19 letter directed to Mark Lieberman, stating in relevant parts:
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21 “I caution you to conduct your investigation here very carefully. The
22 Complaint you filed is sanctionably frivolous, and should you choose
23 to continue your representation of Mr. David, you will be in violation
24 of your professional duties. Your failure to do the basic due diligence
25 required of you by law will be swiftly met with a motion for sanctions
26 pursuant to FRCP Rule 11, subdivision (c).”
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1 The term “here” as used by Chora was clearly uttered and received by 8.
2 Mark Lieberman as threatening, and to identify the state of California. Mark
3 Lieberman understood Chora’s words to suggest that any continued investigation
4 into relevant matters within the state of California, would result in absolute
5 repercussions from the hometown judiciary.
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8 9. Chora further asserted to David’s ADA disability, in that Chora represented
9 that, “Mr. David lacks any credibility and has a strong propensity for manufacturing
10 his “truths”...” (Emphasis original)
11

12 10. Three days following the threatening letter and more specifically on January
13 27, 2023, the RICO lawsuit was transferred to the Central District of California
14 pursuant to 28 U.S.C.A. § 1404(a), and subsequently docketed under 2:23-cv-00736-
15 ODW-AS.
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18 11. Immediately following transfer of the case, California attorney Ronda
19 Baldwin-Kennedy, formally contacted defending parties to include but not limited
20 to the instant defendant, advising each party of the pending lawsuit, placing each
21 party on notice, and receiving verbal acceptance of process by the parties.
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24 12. On February 3, 2023, Thomas Girardi was indicted by a federal grand jury for
25 the Central District of California. Thomas Girardi was charged in a (5) five count
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1 Indictment for embezzling at least fifteen million dollars from clients over a (10)
2 ten-year period.
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4 13. The scheme type charged against Thomas Girardi by the government was in
5 line with the civil RICO activities first alleged by David against both, Thomas
6 Girardi, and the defendant to the instant case.
7

8 14. On February 21, 2023, the Plaintiff's civil RICO lawsuit was dismissed
9 without prejudice due to a technical violation of the federal rules. Plaintiff has
10 refrained from refileing the civil RICO action pending resolution of the government's
11 criminal prosecution(s) in the Girardi case.
12

13 15. On or about June 1, 2023, Chora engaged in the first of many known and
14 unknown trespasses against the Plaintiffs.
15

16 16. Chora engaged in conversion of property or otherwise unlawful conduct under
17 the rouge of legal process from the Superior Court of the State of California. In that,
18 at the time of all criminal wrongdoings Chora was acting with agents of law
19 enforcement under color of state law.
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21 17. Upon information and belief, Chora removed from the Plaintiff's residence
22 and for the purpose of stealing electronic data storage devices items, and that said
23 items were beyond the scope of any civil process.
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1 18. The stolen items included a computer hard drive, USB Thumb Drives,
2 personal electronics, and electronic home security devices which had little or no
3 resale or monetary value save for the data or otherwise stored information contained
4 within the devices.
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6 19. On June 1, 2023, Chora further took possession of property to include but not
7 limited to an Apple iPad / “Airtag” device known from hereafter as the “iPad”
8 owned by NISSRINE QUIB, also known as LEILA and known from hereinafter as
9 Nissrine. Nissrine was at all relevant times a resident within the Plaintiff’s Malibu
10 home.
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13 20. Upon taking possession of the iPad, Chora cataloged the iPad under inventory
14 number 7.7b to page (7) seven of the Los Angeles County Sheriff’s Department,
15 Civil Management Bureau Case Inventory form. However, Chora neglected to make
16 such inventory entries for the stolen electronic data storage devices.
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19 21. Upon information and belief, Chora at some time after the date of June 1, 2023,
20 circumvented the court’s assets Receiver, and the chain of custody so as to gain
21 possession and control of the Plaintiff’s inventoried electronic devices to include but
22 not limited to the iPad.
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1 22. Upon information and belief, Chora acted to gain possession and control of
2 David's electronically stored data files in furtherance of a (4) four prong unlawful
3 scheme to:
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5 (1) gain knowledge of, and or destroy, and or secret, and or hinder, or
6 otherwise to criminally obstruct the availability of discoverable evidence
7 to the federal government derived from David's civil RICO case, where
8 such evidence could be material to the pending criminal prosecution in the
9 matter of United States v. Girardi;
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11 (2) to destroy, and or secret, and or hinder the availability of discoverable
12 evidence to the government relating to Chora's *own* criminal liability in
13 the matter in United States v. Girardi;
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15 (3) to destroy, and or secret, and or hinder the availability of discoverable
16 evidence to the Government of Greece, relating to Chora's criminal
17 liability for the unlawful collection of debt under the laws of that sovereign.
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19 The criminal enquiry in the country of Greece was initiated in April 2023
20 by Greek attorney THEMIS SOFOS, and are racketeering "like"
21 allegations that victimized David and his property; and
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1 (4) to destroy, and or secret, and or hinder the availability of discoverable
2 evidence necessary to reinstate the civil RICO lawsuit against the
3 defendant.
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5 23. At 14:05 hours on May 24, 2023, an attempted unlawful entry was made at
6 the Malibu, California, residence of the Plaintiffs. During the episode, residential
7 surveillance cameras captured the images of convicted murderer TERRY VANCE
8 LUCE attempting to gain entry to the Malibu property.
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11 24. On June 4, 2023, incriminating images of Terry Vance Luce from the
12 Plaintiff's DVR were released in an online publication. The publication further
13 reported:
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15 "There is a real issue of corrupt sheriff gangs in LA, who can be
16 hired by individuals like Chora to target wealthy individuals or
17 exploit insurance policies through process within the LA Courts
18 system. Chora is associated with Tom Girardi, who is currently
19 facing a 20-year sentence...."

20 25. Approximately (11) eleven days following the release of the surveillance
21 footage by online media, and more specifically on or about June 15, 2023, Chora
22 again returned to the Plaintiffs' Malibu, California residence.
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24 26. During Defendant's second return to the Plaintiffs' residence, Chora
25 uninstalled or caused to be uninstalled, the security monitoring system's digital
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1 video recorder, known from hereinafter as the “DVR”. Upon uninstalling the DVR,
2 the device was removed or otherwise stolen from the residence. Chora again
3 neglected to list or to otherwise inventory the DVR on any official record.
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5 27. Upon information and belief, the DVR was targeted for conversion by Chora
6 while acting under color of law in effort to destroy, and or secret, and or hinder the
7 availability of discoverable evidence of his own criminality. All in violation of
8 violation of California state law.
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11 **CLAIM ONE FOR TORT RELIEF**
12 ***(Trespass To Chattel)***
13 **JOSEPH CHORA**

14 Plaintiff incorporates by reference pages 1 through 11 as set forth above. On
15 or about June 1, 2023, JOSEPH CHORA, unlawfully entered onto the Plaintiff's
16 property located at 23768 Malibu Road, Malibu, California, 90265, to include
17 entering the residential dwelling. Chora took possession of property belonging to,
18 and in possession and control of the Plaintiff to include but not limited to a large
19 portfolio type book containing NUDE PHOTOGRAPHS of Nissrine, but gifted to
20 and belonging to David. Chora intentionally interfered with Nissreen's right to
21 privacy privacy and David's use or otherwise enjoyment of the nude photographs.
22 Chora took possession of the nude photographs belonging to Nissrine without the
23 consent of David and damage to David resulted from the actions of Chora. Chora is
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1 being sued for compensatory damages in the amount of \$1,500,000.00 USD;
2 nominal damages as determined by a jury and for punitive award as to be determined
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4 by a jury.

5 **CLAIM TWO FOR TORT RELIEF**
6 ***(Trespass To Chattel)***
7 **JOSEPH CHORA**

8 Plaintiff incorporates by reference pages 1 through 11 as set forth above. On
9 or about June 1, 2023, JOSEPH CHORA, unlawfully entered onto the Plaintiff's
10 property located at 23768 Malibu Road, Malibu, California, 90265, to include
11 entering the residential dwelling. Chora took possession of property belonging to,
12 and in the possession and control of the Plaintiff to include but not limited to
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14 ELECTRONIC DATA STORAGE DEVICES belonging to DAVID. Chora
15 intentionally interfered with David's use of the Electronic Data Storage Devices.
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17 Chora took possession of the Electronic Data Storage Devices belonging to David
18 without the consent of David and damage to David resulted from the actions of
19 Chora. Chora is being sued for compensatory damages in the amount of
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21 5,000,000.00 USD; nominal damages as determined by a jury and for punitive award
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23 as to be determined by a jury.
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1 **CLAIM THREE FOR TORT RELIEF**
2 **(*Trespass To Chattel*)**
3 **JOSEPH CHORA**

4 Plaintiff incorporates by reference pages 1 through 11 as set forth above. On
5 or about June 1, 2023, JOSEPH CHORA, unlawfully entered onto the Plaintiff's
6 property located at 23768 Malibu Road, Malibu, California, 90265, to include
7 entering the residential dwelling. Chora took possession of property belonging to,
8 and in the possession and control of the Plaintiff to include but not limited to an
9 ELECTRONIC DIGITAL VIDEO RECORDER (DVR) belonging to DAVID.
10 Chora intentionally interfered with David's use of the Electronic Digital Video
11 Recorder (DVR). Chora took possession of the Electronic Digital Video Recorder
12 (DVR) belonging to David without the consent of David and damage to David
13 resulted from the actions of Chora. Chora is being sued for compensatory damages
14 in the amount of 95,000.00 USD; nominal damages as determined by a jury and for
15 punitive award as to be determined by a jury.
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21 **CLAIM FOUR FOR TORT RELIEF**
22 **(*Invasion of Privacy*)**
23 **JOSEPH CHORA**

24 Plaintiff incorporates by reference pages 1 through 11 as set forth above. On
25 or about JUNE [1], 2023, JOSEPH CHORA, unlawfully violated the inalienable
26 right to Plaintiffs' privacy under article I., sec. 1 to the California Constitution. In
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1 that Chora unlawfully entered onto Plaintiffs' property located at 23768 Malibu
2 Road, Malibu, California, 90265, to include entering the residential dwelling. Chora
3 is a nongovernment entity. Upon information and belief Chora invaded the privacy
4 of Plaintiffs without the consent of Plaintiffs and with intent to perform an act of
5 burglary under color of law, and damage to Plaintiffs' privacy resulted from the
6 actions of Chora. Chora is being sued for compensatory damages in the amount of
7 \$5,000,000.00 USD; nominal damages as determined by a jury and for punitive
8 award as to be determined by a jury.
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14 **CLAIM FIVE FOR TORT RELIEF**
15 ***(Invasion of Privacy)***
16 **JOSEPH CHORA**

17 Plaintiff incorporates by reference pages 1 through 11 as set forth above. On
18 or about JUNE [15], 2023, JOSEPH CHORA, unlawfully violated the inalienable
19 right to Plaintiffs' privacy under article I., sec. 1 to the California Constitution. In
20 that Chora unlawfully entered onto Plaintiffs' property located at 23768 Malibu
21 Road, Malibu, California, 90265, to include entering the residential dwelling. Chora
22 is a nongovernment entity. Chora invaded the privacy of Plaintiffs without the
23 consent of Plaintiff. Upon information and belief Chora invaded the privacy of
24 Plaintiffs without the consent of Plaintiffs and with intent to perform an act of
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1 burglary under color of law, and damage to Plaintiffs' privacy resulted from the
2 actions of Chora. Chora is being sued for compensatory damages in the amount of
3 \$5,000,000.00 USD; nominal damages as determined by a jury and for punitive
4 award as to be determined by a jury.
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7 **CLAIM SIX FOR TORT RELIEF**
8 *(Conversion)*
9 **JOSEPH CHORA**

10 Plaintiff incorporates by reference pages 1 through 11 as set forth above. On
11 or about June 1, 2023, JOSEPH CHORA, wrongfully exercised dominion over the
12 Plaintiff's property to include but not limited to an ELECTRONIC DATA
13 STORAGE DEVICES belonging to DAVID. David had ownership rights to the
14 ELECTRONIC DATA STORAGE DEVICES and damage to David resulted from
15 the actions of Chora. Chora is being sued for compensatory damages in the amount
16 of \$5,000,000.00 USD; nominal damages as determined by a jury and for punitive
17 award as to be determined by a jury.
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21 **CLAIM SEVEN FOR TORT RELIEF**
22 *(Conversion)*
23 **JOSEPH CHORA**

24 Plaintiff incorporates by reference pages 1 through 11 as set forth above. On
25 or about June 1, 2023, JOSEPH CHORA, wrongfully exercised dominion over the
26 Plaintiff's property to include but not limited to an ELECTRONIC DIGITAL
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1 VIDEO RECORDER (DVR) belonging to DAVID. David had ownership rights to
2 the ELECTRONIC DIGITAL VIDEO RECORDER (DVR) and damage to David
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4 resulted from the actions of Chora. Chora is being sued for compensatory damages
5 in the amount of \$50,000.00 USD; nominal damages as determined by a jury and for
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7 punitive award as to be determined by a jury.

8 **CLAIM EIGHT FOR TORT RELIEF**
9 ***(Intentional Infliction of Emotional Distress)***
10 **JOSEPH CHORA**

11 Plaintiff incorporates by reference pages 1 through 11 as set forth above. On
12 or about February 23, 2023, JOSEPH CHORA, intentionally inflicted emotional
13 distress onto David, a protected person under the American Disability Act (ADA),
14 in that Chora misstated essential facts in a judicial proceeding and more specifically
15 before Judge Timothy Falls, Superior Court of the State of California. Chora
16 intentionally misstated essential facts regarding David's ADA service dog VADER.
17 Chora intentionally represented that Vader had bitten two unnamed individuals at
18 unspecified times and unknown locations. Chora intentionally acted so as to have
19 Vader removed from the judicial proceeding. Chora was aware that removal of
20 David's service animal would agitate David's ADA recognized condition causing
21 David to appear to be emotionally adverse before the court. Chora acted with malice
22 to affect tactical advantage over David who was Chora's adverse litigant during the
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1 proceeding. Chora is being sued for compensatory damages in the amount of
2 10,000,000.00 USD; nominal damages as determined by a jury and for punitive
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4 award as to be determined by a jury.

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6 **JURY DEMAND**, Pursuant to Fed. R. Civ. P. 38(b), Plaintiffs hereby demands a
7 trial by jury of all issues so triable that are raised herein or which hereinafter may be
8
9 raised in this action.

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11 **PRAYER FOR RELIEF WHEREFORE**, the plaintiffs by and through counsel
12 prays for judgment against Defendants as follows:

- 13
14 1. Finding that defendant is liable for all damage caused to plaintiffs;
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16 2. Awarding Plaintiff monetary damages in the aggregate amount of not less than
17 \$31,645,000.00 said amount to be proven at trial;
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19 3. Awarding Plaintiff its litigation expenses, including reasonable attorneys' fees,
20 costs, and disbursements;
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22 4. Awarding Plaintiffs punitive damages in the sum of not less than \$32,000,000.00
23 or an amount otherwise to be decided by a jury; and
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25 6. Granting such other relief as the case may require or as may be deemed proper
26 and equitable.

27 Respectfully Submitted,