



URGENT • CONFIDENTIAL • EVIDENCE-PRESERVATION REQUEST

ANTIGUA & BARBUDA - INVESTIGATIVE REFERRAL

Consolidated cross-border evidence, witness, preservation and law-enforcement
coordination bundle

METROPOLITAN POLICE

01/7434911/25

ASSIGNED INVESTIGATOR

DC Dumpleton (as notified by T/DC Pinkham)

CID ANTIGUA

Existing registration — reference to be inserted

SUBMITTED BY

Alkiviades Andrew David

Opening summary

Asot Michael was a senior Antiguan parliamentarian, businessman and public figure whose killing created a matter of national and international concern. I knew Mr Michael personally and regarded him as a friend, political interlocutor and source of first-hand information concerning Antigua's political, commercial and sovereign-asset environment. My evidence must be tested independently, but my relationship gave me direct access to conversations, records and people that may assist investigators.

REPORTED ASSESSMENT REQUIRING FORMAL STATEMENTS

I understand from my discussions that attorney Leon Chaku Symister and Mr Michael's son, Nigel Michael, share the view that the killing was political in character. That understanding is recorded here as a lead and not as a proven conclusion. Investigators should obtain their own signed statements, identify the factual basis for each person's assessment, and test alternative explanations.

Daphne Barak and associated cross-border pathway

The materials supplied by me identify journalist and intermediary Daphne Barak as a potential evidential and communications pathway requiring lawful examination. The proposed link is not that her mere association proves criminal conduct. The investigative question is whether communications, introductions, media activity, legal-strategy discussions, shipping or port relationships, or contacts with



persons connected to Antigua intersected with Mr Michael's records, political conflicts, sovereign assets, Alfa Nero, port interests, witness pressure or the custody of evidence. Any review should proceed from authenticated communications, financial records, travel data and witness testimony, not from inference by association.

High-priority cross-border leads requiring immediate verification

The submitter reports that Daphne Barak and Dani Peretz are closely associated through overlapping personal, professional or intermediary networks said to include Ehud Barak. This is recorded as a witness-supplied lead, not an established fact. Investigators should obtain the underlying communications, introductions, travel records, financial records and witness statements before drawing any conclusion.

The submitter further reports that Ehud Barak is sought for questioning or investigative review in Dallas in connection with matters touching the death of Aaron Cain McKnight. The precise agency, legal status and scope of that asserted interest have not been independently verified in this filing. Dallas law-enforcement authorities should be asked directly to confirm whether any open inquiry, request for interview, preservation request or evidential interest exists.

The late John Quirk is said to have prepared or held reporting relevant to Daphne Barak, Erbil Gunasti, Turkish diplomatic or consular connections and related intermediary networks. Because Mr Quirk is deceased, investigators should urgently identify the lawful custodian of his devices, emails, notes, recordings and source materials and preserve them in native form.

The submitter reports a close personal association between Daphne Barak and Gloria Allred and a possible property, tenancy, professional or communications link involving the Turkish Consulate in Los Angeles. These assertions require independent verification from primary records and should not be treated as evidence of wrongdoing merely by association.

Documented EUR 12 million loan dispute involving Dani Peretz

Exhibit B is an Extrajudicial Declaration dated 14 January 2025 by Dimitra Fanny David, addressed to Dani Peretz and Alexia David. The declaration states that EUR 12,000,000 was advanced to Willfull Holdings Ltd., that EUR 1,000,000 was repaid and that EUR 11,000,000 remained outstanding. It also refers to witness affidavits and to Greek criminal complaint file E23-351. The declaration is evidence that the allegation and legal demand were formally made; it is not, by itself, a final adjudication of fraud or liability. Investigators should obtain the original loan agreement, bank records, affidavits, company records and the complete Greek case file.

Reported US\$1.5 million claim concerning Asot Michael

The submitter reports that Daphne Barak asserted that Asot Michael owed her approximately US\$1.5 million. That assertion may be relevant to financial motive, leverage, communications and witness credibility, but it must be verified from contracts, invoices, bank records, messages, recordings and



testimony. Investigators should determine the origin, date, legal basis and disposition of the alleged claim and whether it intersected with Alfa Nero, political communications, media activity or other disputes involving Mr Michael.

Purpose and linkage to existing investigation

This is a supplemental filing for an existing Metropolitan Police matter and an existing CID Antigua registration. It is not a request to create a duplicate investigation. The enclosed Metropolitan Police correspondence records reference 01/7434911/25 and states that DC Dumpleton took charge after T/DC Pinkham moved teams. Exhibit A is appended as the documentary link to that investigation.

Metropolitan Police website: www.met.police.uk



1. Executive Summary

I respectfully request that the Metropolitan Police Service and the Criminal Investigations Department of Antigua and Barbuda place this submission on the existing investigative record concerning the killing of the Honourable Asot Michael.

The immediate purpose is to secure urgent cross-border preservation and coordinated assessment of potentially related homicide, fraud, corruption, obstruction, money-laundering, asset-control, witness-safety and court-record-integrity leads. Named persons are identified for investigation or verification only; inclusion is not a finding of guilt.

The evidential record spans a Scotland Yard investigative memorandum dated 9 April 2026; CID registration and supporting witness materials dated 22 April 2026; Antigua High Court proceedings concerning document provenance and record integrity; English and United States court records containing preservation requests and witness pathways; and communications involving potential witnesses, lawyers, officials and evidence custodians.

Investigators are asked to separate direct knowledge, witness accounts, documentary evidence, public reporting and inference; authenticate each item independently; and preserve original devices, files, metadata, access logs, court-registry records, financial records and communications before alteration or loss.

2. Existing Investigative and Procedural Status

Record	Status / relevance
Metropolitan Police	Existing matter under reference 01/7434911/25. Uploaded correspondence states that DC Dumpleton became the officer in charge after T/DC Pinkham moved teams.
CID Antigua	The submitter states that a CID registration has already been made and prior evidence packages have been delivered. The CID intake number, assigned officer, routing and present status should be formally confirmed.
Antigua High Court	ANUHCV2026/0284 is identified as a related civil proceeding against the Attorney General of Antigua and Barbuda and others. The proceeding may contain evidence and preservation issues, but does not itself establish criminal responsibility.



Record	Status / relevance
England and United States	Relevant preservation and witness materials are said to appear in KB-2025-001991, CA-2025-002562, 4:23-cv-00435-SDJ-BD, 1:26-cv-05619-LTS, 1:25-mc-00098-JMF and 1:26-mc-00243-PAE-SDA.

3. Law-Enforcement and Legal Assistance Pathway

Assistant Commissioner of Police Albert Wade is identified as a law-enforcement liaison and evidence-preservation participant. Prior materials state that he joined an investigative task force concerning Asot Michael, was close to Mr Michael, and may possess or assist in locating relevant communications, witness information, custody records or coordination records. The submitter understands that he has liaised with INTERPOL. Each point should be directly confirmed by Assistant Commissioner Wade and the relevant agencies.

Professor Robert Y. Altchiler is identified in prior United States filings as an existing record witness who has provided preserved testimony and expressed willingness to assist with authentication or clarification through lawful process. Professor Ronald S. Sullivan Jr. is identified as having participated in substantive preservation and witness discussions and as potentially willing to provide evidence within his personal knowledge. Their precise roles should be confirmed by them in writing; neither should be represented as adopting every allegation or theory.



4. Core Investigative Questions

1. Did any financial, commercial, political, port, sovereign-asset or litigation interest have a motive to influence, suppress, exploit or redirect evidence concerning Asot Michael?
2. Were evidence, court records, defendant lists, filing versions, metadata or registry entries connected to ANUHCV2025/0149 or ANUHCV2026/0284 altered, removed, substituted, withheld or irregularly handled?
3. Did witness intimidation, reputational attacks, strategic litigation, legal-media pressure or private-intelligence activity intersect with the homicide investigation or custody of relevant evidence?
4. Did cross-border assets, companies, shipping or port interests, sanctions narratives or Alfa Nero-related allegations conceal transactions, create leverage or obstruct scrutiny?
5. Do communications held by lawyers, consultants, media intermediaries, public officials, corporate actors or digital repositories contain relevant admissions, threats, instructions, payment trails or evidence-custody information?
6. Do any authenticated Daphne Barak-related communications or contacts intersect with Asot Michael, Antigua political or sovereign-asset disputes, port interests, Alfa Nero, litigation strategy or witness/evidence pathways?
7. Does the Asot Michael evidence overlap with records concerning other deaths or witness-safety concerns referenced in Dallas and SDNY materials, and is formal inter-agency coordination warranted?
8. Are there authenticated retainers, payments, assignments, communications or shared clients establishing any Branca-Benjamin-Barak-Boies-Kapon relationship, and do any Pellicano records or Kapon-family statements lawfully connect those relationships to witness pressure, violence, evidence interference or any death under review?

5. Litigation Roadmap and Turning Points

This roadmap identifies the principal proceedings and procedural turning points through which the Alfa Nero controversy, the killing of the Honourable Asot Michael, the proceedings against the Attorney General of Antigua and Barbuda, and the related United States and English litigation have intersected. It is a navigation aid only: the existence of a case, allegation, default, order or filing is not proof of criminal conduct. Investigators should obtain certified dockets and orders directly from each court.

5.1 Chronological turning points

2024 - Alfa Nero controversy and political narrative - Public allegations and disputes concerning the Alfa Nero became part of the political and reputational background. The referral asks investigators to



preserve the original statements, identify their authors and sources, and determine whether any were knowingly false or connected to pressure, motive or obstruction.

November 2024 - killing of Hon. Asot Michael - The homicide is the central event. The submitter reports that Leon Chaku Symister and Nigel Michael regard it as a political assassination. Their factual basis must be obtained in separate signed statements and tested against forensic, communications, financial and witness evidence.

2025 - Antigua High Court claim ANUHCv2025/0149 - The claim assembled allegations and evidence concerning multiple defendants and cross-border actors. Service, appearances, defaults, registry records and every version of the pleadings should be independently verified.

6 May 2026 - Williams ruling in ANUHCv2025/0149 - The ruling reportedly concluded that the United States had the substantially stronger connection. This became a procedural bridge toward the Dallas litigation; it did not itself determine the truth of the underlying allegations.

May-July 2026 - English proceedings before Senior Master Cook - In KB-2025-001991, the English court addressed litigation capacity and stayed the matter pending a psychiatric report. The English record is relevant to preservation, consistency of evidence and the handling of related allegations, but is not a criminal determination.

June-July 2026 - Dallas and SDNY consolidation points - The Eastern District of Texas and Southern District of New York matters placed related corporate, jurisdictional, preservation and alleged misconduct issues before United States federal courts. Their dockets should be treated as repositories of submissions and exhibits, not as proof unless adopted in findings or orders.

July 2026 - ANUHCv2026/0284 against the Attorney General and others - The later Antigua action is reported to concern Alfa Nero-related defamation, governmental conduct and matters linked by the submitter to Asot Michael. Investigators should obtain the sealed and public versions, filing receipt, service evidence and complete registry audit trail.

5.2 Case-by-case roadmap

Proceeding	Turning point and investigative relevance
Antigua and Barbuda High Court - ANUHCv2025/0149	Core Antigua proceeding. Turning point: Williams ruling of 6 May 2026 reportedly identified the United States as the substantially stronger forum. Obtain the certified order, complete docket, service evidence, default records and registry metadata.
Antigua and Barbuda High Court - ANUHCv2026/0284	Proceeding against the Attorney General of Antigua and Barbuda and others. Reportedly links Alfa Nero-related defamation and governmental conduct to the wider



	evidential narrative. Status and pleaded causes must be verified from the court file.
Judicial Committee of the Privy Council - EC/2026/0091/PC	Eligibility decision of 25 June 2026 reportedly concluded that the proposed route of appeal did not lie to the Privy Council, with a possible single-judge review route. Relevant to procedural history only.
King's Bench Division - KB-2025-001991 (earlier QB references)	Matter before Senior Master Cook. Turning point: 13 May 2026 order requiring a psychiatric capacity report and staying the claim. Relevant for evidence preservation and cross-court consistency.
E.D. Texas - David et al. v. Comcast Inc. et al., 4:23-cv-00435-SDJ	Dallas-area federal action. Turning points include the amended complaint, personal-jurisdiction submissions, the entity-counsel issue and the 17 July 2026 order stating that no further filings would be acted on before the recommendation on the motion to dismiss.
S.D.N.Y. - In re Yulia Guryeva-Motlokhov, 1:25-mc-00098-JMF	Section 1782 proceeding. Turning points include authorization of discovery, intervention and vacatur litigation, termination, and later filing restrictions. Relevant exhibits must be separated from arguments that were struck or denied.
S.D.N.Y. - David v. Boies Schiller Flexner LLP, 1:26-mc-00243-PAE-SDA	Related miscellaneous proceeding involving preservation and alleged law-firm or intermediary conduct. Obtain the full docket and identify which submissions were accepted, rejected or converted.
S.D.N.Y. - David v. Boies Schiller Flexner LLP et al., 1:26-cv-05619-LTS	Civil action created after conversion from the miscellaneous filing on 26 June 2026. Relevant to the alleged hologram, corporate, reputational and evidence-preservation pathway.

5.3 Investigative synthesis

The asserted pathway is: Alfa Nero-related political and reputational conflict; the killing of Asot Michael; Antigua litigation and alleged procedural defaults; the Williams forum ruling pointing toward the United States; related preservation and jurisdiction litigation in Dallas and New York; and continuing English oversight before Senior Master Cook. That pathway is a hypothesis for structured testing, not a finding. Investigators should build a single source-controlled chronology showing, for every proposition, the



originating document, author, date, court status, authentication method and whether the proposition has been judicially accepted, disputed or not adjudicated.

5.4 Immediate roadmap requests

- Obtain certified dockets and operative orders from every court listed above.
- Cross-reference each Alfa Nero statement, Asot Michael-related allegation and Attorney General-related pleading to its original source and publication date.
- Preserve native court filings, exhibits, email headers, messaging exports and registry audit logs.
- Identify factual overlap among the Antigua, Dallas, New York and London records without treating repetition across pleadings as corroboration.
- Prepare a conflict-free chart distinguishing parties, witnesses, lawyers, intermediaries, deceased witnesses and persons mentioned only as investigative leads.
- Use INTERPOL or mutual legal-assistance channels only where a competent authority verifies a criminal-law basis and the applicable legal threshold is met.

5.5 Pellicano Contact, Reported Monthly Proposal and Kapon Witness Pathway

The submitter states that a person he understood to be Anthony Pellicano said, in substance, that for approximately US\$30,000 per month the disputes, pressure or attacks affecting him would "go away." This is direct witness testimony from the submitter, not an independently authenticated recording or written admission. Investigators are requested to obtain the original devices, call logs, messages, billing records, notes and any recordings capable of establishing the exact words, date, context, participants and intended meaning.

The appended Pellicano exhibit contains screenshots of contacts labelled "Pellicano 2020" and "Pellicano Contact," an incoming message stating that the sender was on the Pacific Coast Highway and would arrive soon, messages transmitting a Malibu address, and CCTV imagery supplied with a request that it be passed to "Anthony." Contact labels alone do not authenticate the identity of the user of a telephone number; subscriber records, device extraction and metadata are required.

The submitter further reports that members of the Kapon family identify Danny Kapon Sr. as having performed violent or enforcement work for Pellicano, using the expression "wet worker." That serious allegation must be obtained separately from each witness under signed statement, with a clear distinction between first-hand knowledge, family history, hearsay and inference. No criminal conclusion is requested from the description alone.

5.6 Additional Witness and Contemporaneous Text Evidence Concerning the Reported House Visits

The submitter states that the person he understood to be Anthony Pellicano attended his residence on two occasions. Contemporaneous text messages contained in the appended Pellicano exhibit, or further messages available for forensic extraction, are said to reference or arrange those visits. Independent



witnesses are available who can confirm the physical presence of the individual at the property on those two occasions.

Investigators are requested to:

- forensically image the original device or devices containing the relevant text messages and obtain full subscriber records, metadata and chain-of-custody information;
- obtain separate signed statements from each identified witness limited strictly to personal knowledge, including the dates of the visits, the physical description of the person observed, any conversation overheard and the basis for any identification; and
- preserve any contemporaneous supporting records, including CCTV, visitor logs, photographs, property-access records, telephone records or notes.

Contact labels, message screenshots and the submitter's account do not themselves authenticate identity. The witness accounts and any forensically verified messages are submitted for independent examination under the evidence classification protocol, principally Classes A-C. No conclusion of identity, motive or criminality is asserted from these materials alone.

5.7 Reported Branca-Benjamin-Barak-Boies and Kapon Relationship Pathway

The submitter reports that Steadroy Benjamin and his sons Damian Benjamin and Kevon Benjamin have professional, commercial or agency relationships connected to John Branca; that members of the Kapon family are linked to those pathways; and that Daphne Barak has acted for, worked with or provided services connected to John Branca and David Boies. These are reported relationships requiring proof, not adjudicated facts.

The filed Antigua materials establish a narrower procedural fact: John Branca, Daphne Barak and David Boies were named in the earlier Antigua pleading, while the Attorney General, Steadroy Benjamin and Zachary Phillips are defendants in ANUHCV2026/0284. Appearance in related pleadings does not itself establish employment, agency, coordination or wrongdoing. The claimed connections should be tested through primary records rather than repetition across pleadings.

Reported relationship / source	Present evidential status	Primary records requested
Steadroy Benjamin - John Branca	Reported by the submitter; not proved by the appended complaint.	Retainers, payment records, instructions, meetings, communications, introductions, corporate records and witness statements.
Damian Benjamin - Branca interests	Reported relationship requiring independent authentication.	Employment agreements, directorships, invoices, bank records, email and messaging records.
Kevon Benjamin - Branca interests	Reported relationship requiring independent authentication.	Employment agreements, directorships, invoices, bank records, email and



		messaging records.
Kapon family - Benjamin pathway	Reported witness pathway; source and basis must be particularised.	Separate signed statements, communications, travel, financial records and safeguarding assessment.
Daphne Barak - John Branca	Reported professional or intermediary relationship.	Assignments, contracts, payment records, introductions, calendars, messages and source testimony.
Daphne Barak - David Boies / related firm	Reported professional or intermediary relationship.	Retainer or consulting records, invoices, communications, common-client records and sworn testimony.
Danny Kapon Sr. - Pellicano	Serious reported family identification; presently uncorroborated in the appended documents.	Named witness statements, official records, communications, payments, travel and Pellicano archive material.

5.8 Disability, Capacity and Criminal-Record Context

Some communications contain anger, hostility or dysregulated language. The submitter relies on court-directed and neuropsychological material concerning traumatic brain injury, executive-function impairment and emotional regulation, while accepting that disability does not determine whether the underlying factual allegations are true. Tone and objective evidence should be assessed separately.

The submitter states that Dr Flavian Costin Naclad assessed him for the English proceedings and that the court accepted litigation capacity while considering functional limitations and reasonable adjustments. He also relies on an ACRO Police Certificate recording "No Trace" as of its issue date. The ACRO certificate concerns disclosed criminal-record status only; it does not authenticate disputed allegations or establish the truth of this referral.

5.9 Evidential Limits and Required Safeguards

The additional pathways above are submitted for lawful verification, preservation and witness development. No investigator or court is asked to infer guilt from family relationship, political office, professional association, appearance in a pleading, a contact label, or the existence of civil litigation. Exculpatory material, alternative explanations and evidence disproving the proposed links must be preserved with equal care.

5.10 Public Commentary and Judicial-Criticism Materials - Retained With Limiting Direction

The bundle retains the submitted public commentary concerning Senior Master Cook and the visibility of King's Bench records. It is included solely to establish publication, notice, chronology, the submitter's contemporaneous state of concern and the existence of referenced screenshots or court materials. Its headlines, editorial characterisations and rhetorical language are not adopted as proof of judicial misconduct, criminality, concealment or any underlying allegation.



Investigators and courts are requested to distinguish the underlying source material - including court filings, orders, CE-File or public-search screenshots and correspondence - from the author's commentary. Each underlying item should be authenticated independently. The article should be maintained in a clearly marked public-commentary appendix and should not displace the primary evidence, procedural record or neutral preservation requests.

6. Evidence Classification Protocol

Class	Type	Required treatment
A	Direct personal knowledge	What the witness personally saw, heard, sent, received or did.
B	Identified witness account	Information attributed to a named person; obtain a signed statement and test credibility.
C	Documentary or digital record	Authenticate original/native file, provenance, metadata and custody.
D	Publicly reported fact	Verify against primary records and distinguish reporting from proof.
E	Investigative inference	A proposed connection or hypothesis requiring independent corroboration.
F	Exculpatory or contradictory material	Preserve and disclose material that weakens or disproves a proposed theory.
I	Pellicano contacts, messages and CCTV exhibit	Nine-page image exhibit showing purported contacts, messages, numbers and CCTV imagery. Appended for authentication; contact labels are not proof of identity.
J	Filed Antigua complaint ANUHCv2026/0284	Filed claim against the Attorney General, Steadroy Benjamin and Zachary Phillips, including prior pleading comparison naming Branca, Barak and Boies. Appended as procedural and notice evidence, not proof of the pleaded allegations.
K	ACRO Police Certificate	Certificate recording "No Trace" as of its issue date. Appended for limited criminal-record context.



Clas s	Type	Required treatment
L	King's Bench order / Naclad context	Court material concerning capacity, participation and reasonable adjustments. Appended for limited disability and procedural context.
M	House-visit messages and witnesses	Purported contemporaneous messages, CCTV and independent witnesses concerning two reported residence visits. Identity must be established through forensic and testimonial evidence; no inference of motive or criminality from contact labels alone.
N	Public commentary concerning King's Bench	Retained solely for publication, notice and chronology. Editorial allegations are not primary evidence; authenticate each underlying court record or screenshot separately.



7. Priority Preservation Categories

- All CID and Metropolitan Police intake records, complaint references, routing records, investigator notes, evidence logs, chain-of-custody forms, referral records and inter-agency communications.
- All devices, cloud accounts, email, messaging applications, photographs, video, audio, call-detail records, contacts and location data lawfully obtainable concerning Asot Michael and material witnesses.
- Court-registry native files, audit logs, version history, filing receipts, access logs, service records, sealing records, clerk communications and certified copies for ANUHCV2025/0149 and ANUHCV2026/0284.
- Records concerning Antigua sovereign assets, West Indies Oil, Alfa Nero, port infrastructure, foreign port or shipping interests and related governmental or commercial communications relevant to motive or benefit.
- Law-firm, public-relations, media, private-intelligence, consultant and intermediary communications where a lawful basis exists to suspect relevance to witness pressure, evidence suppression, reputational leverage, asset concealment or obstruction.
- Native copies and metadata for materials lodged or referenced in the listed English and United States proceedings.
- Communications, call records, notes and testimony voluntarily supplied or lawfully obtained from Assistant Commissioner Wade, Professors Altchiler and Sullivan, Leon Chaku Symister, Nigel Michael, Daphne Barak and other identified custodians or witnesses.
- Original devices, backups, contact databases, call-detail records, subscriber records, recordings, invoices, retainers and native messages relating to the purported Pellicano contacts and the reported US\$30,000 monthly proposal.
- Separate Kapon-family witness statements and all records capable of confirming or disproving the reported role of Danny Kapon Sr., with witness-safety arrangements where objectively required.
- Retainers, payments, employment records, corporate records, calendars, travel, communications and common-client records capable of confirming or disproving the reported Branca-Benjamin-Barak-Boies relationship pathway.
- Original and backup copies of the contemporaneous messages said to arrange or reference two house visits, together with property CCTV, visitor records, access logs, photographs, notes and witness-identification material.
- Public-commentary publications and screenshots concerning the King's Bench record, retained separately from primary evidence and labelled as chronology and notice material only.



8. Requested Investigative Actions, Including INTERPOL Coordination

- 1.** Link this submission and Exhibit A to Metropolitan Police reference 01/7434911/25 and confirm the assigned unit and officer.
- 2.** Confirm the CID registration number, receipt date, assigned officer and status of all prior submissions.
- 3.** Create one consolidated exhibit register with a unique identifier for every document, device, native file, witness statement and derivative copy.
- 4.** Obtain a formal statement from Assistant Commissioner Albert Wade limited to his personal knowledge, communications with Asot Michael, handling of evidence and agency coordination.
- 5.** Obtain separate signed statements from Leon Chaku Symister and Nigel Michael concerning the factual basis for their reported assessment that the killing was political in character.
- 6.** Invite Professors Altchiler and Sullivan to confirm their knowledge, prior review, preserved communications and willingness to assist.
- 7.** Conduct a forensic comparison of filed, served, certified and electronically stored versions of relevant Antigua pleadings and defendant lists.
- 8.** Seek lawful preservation notices, production orders, mutual legal-assistance requests or equivalent process before retention periods expire.
- 9.** Prepare a verified financial and corporate relationship map separating ownership, control, payments, communications and mere association.
- 10.** Assess witness-safety risks and provide a secure method for receiving sensitive recordings, devices and testimony.
- 11.** Request that the Antigua and Barbuda INTERPOL National Central Bureau assess whether the verified evidence warrants an INTERPOL diffusion, Blue Notice, mutual legal-assistance request, financial-intelligence referral or other lawful international measure. Any Red Notice should be considered only if a competent national authority has issued a valid arrest warrant for a serious ordinary-law crime and all INTERPOL constitutional and due-process requirements are met.
- 12.** Ask Dallas law-enforcement authorities to confirm the status of any investigation or request for interview concerning Ehud Barak, Aaron Cain McKnight, Mark Lieberman or related evidence, and obtain official reference numbers and preservation instructions.
- 13.** Verify through official channels whether Dani Peretz is presently subject to any INTERPOL notice, diffusion, arrest warrant or criminal proceeding, and obtain the underlying authority rather than relying on second-hand reports.
- 14.** Issue a receipt identifying what was accepted, rejected and what further authentication is required.



15. Forensically image the original device containing the purported Pellicano contacts and messages; obtain subscriber records by lawful process; and compare message timestamps, backups and CCTV exports against contemporaneous records.
16. Obtain separate signed statements from each identified Kapon-family witness, particularising personal knowledge, source, dates, incidents, records, prior reports and any safeguarding concern.
17. Issue targeted preservation and production requests concerning the reported Branca-Benjamin-Barak-Boies relationships, while expressly preserving material that disproves agency, payment, coordination or wrongdoing.
18. Forensically image the original device or devices containing messages said to arrange or reference two visits to the submitter's residence, obtain lawful subscriber and call-detail records, and compare timestamps with CCTV, property-access and witness evidence.
19. Obtain separate signed statements from each house-visit witness, strictly separating personal observation from information received from others and recording the basis, confidence and circumstances of any identification.
20. Retain the Cook public-commentary article in a segregated appendix marked "Publication, Notice and Chronology Only - Not Proof of Allegations," and authenticate any underlying court screenshot, filing or correspondence independently.



9. Related Civil Proceedings and Limits

The submitter has commenced related civil proceedings against the Attorney General of Antigua and Barbuda and others, including ANUHCV2026/0284, and has placed related preservation issues before courts in England and the United States. Those proceedings may contain relevant evidence, admissions, service records, filing metadata, witness materials and preservation requests. They do not themselves establish criminal responsibility.

Investigators should obtain court records through lawful channels and avoid treating argumentative pleadings as substitutes for authenticated evidence. Every disputed allegation should be tested independently. Privileged or legally protected material should be handled under appropriate review, waiver, consent, court order or independent-counsel procedures.

10. Exhibit Schedule

Ex.	Item	Status / purpose
A	Metropolitan Police correspondence	Email identifying reference 01/7434911/25 and notifying the submitter that DC Dumpleton took charge after T/DC Pinkham moved teams. Appended.
B	CID Antigua registration materials	Existing CID registration, receipt, stamped pages and prior evidence schedules. To be supplied or cross-referenced by CID number.
C	Scotland Yard investigative memorandum	Memorandum dated 9 April 2026 and any acknowledgment or transmission record. To be supplied securely.
D	Antigua High Court records	ANUHCV2025/0149 and ANUHCV2026/0284 pleadings, service evidence, native files, registry receipts and metadata.
E	UK and U.S. court materials	Preservation applications, witness materials and relevant exhibits from the proceedings listed above.
F	Witness and custodian materials	Statements, communications and native records from relevant witnesses and custodians, subject to authentication and



Ex.	Item	Status / purpose
		protective handling.
G	Dani Peretz financial declaration	Extrajudicial Declaration dated 14 January 2025 concerning an asserted EUR 12 million loan, EUR 11 million outstanding balance and Greek complaint E23-351. Appended as Exhibit B.
H	Dallas and intermediary-network leads	Official Dallas records, John Quirk materials, and authenticated evidence concerning Barak, Peretz, Ehud Barak, Gunasti, Allred and Turkish consular links. To be obtained and verified.
I	Pellicano contacts, house-visit messages, CCTV and witness pathway	Nine-page screenshot exhibit plus original-device extraction, CCTV and separate statements from witnesses to two reported residence visits. Contact labels alone do not authenticate identity.
J	Public commentary concerning Senior Master Cook	Six-page publication retained in a segregated appendix for notice, chronology and referenced-source identification only; not relied upon as proof of judicial misconduct or criminal allegations.

11. Declaration and Accuracy Safeguards

I make this referral in good faith for assessment by competent investigators. Unless expressly stated otherwise, references to alleged fraud, corruption, obstruction, conspiracy, money laundering, record interference or other criminality are allegations or investigative leads, not adjudicated facts.

I ask investigators to preserve exculpatory as well as inculpatory evidence, consider alternative explanations and record any material that disproves or weakens a proposed connection.

I will supply native files, devices, passwords or access assistance, witness contact details and further statements through a secure and lawful process. Sensitive material should not be circulated publicly or filed openly where doing so could prejudice an investigation, expose victims or endanger witnesses.

12. Formal Request

I respectfully request written confirmation that: (1) this document has been linked to the existing Metropolitan Police and CID records; (2) the accompanying exhibit has been logged; (3) a named officer or unit has responsibility for further communication; (4) urgent preservation steps have been considered; and (5) any evidential defects or additional authentication requirements have been identified.



ALKIVIADES ANDREW DAVID
Claimant in Person

ALKIVIADES ANDREW DAVID

Submitter / witness / litigant in person

SwissX Island, St John's, Antigua and Barbuda

Email: alki@filmon.com | legal@swissx.com

Dated: 22 July 2026

Final consolidation note

This maximum-evidence-protocol version preserves every previously included item while adding the two reported residence visits, contemporaneous-message and independent-witness pathway, enhanced forensic requests, and a limiting direction for public commentary concerning the King's Bench proceedings. It retains the litigation roadmap, Metropolitan Police reference, financial declaration, Pellicano-contact exhibit, Antigua public-office complaint, ACRO certificate and King's Bench capacity material. Every disputed relationship, identity and allegation remains classified for independent authentication, with exculpatory evidence expressly preserved.



EXHIBIT A

Metropolitan Police correspondence

Reference 01/7434911/25

Documentary purpose

The appended email records the Metropolitan Police reference and states that DC Dumpleton became responsible for the matter after T/DC Pinkham moved teams. It is included to link this supplemental referral to the existing police record; it does not itself establish the merits of any allegation.



EXHIBIT B

Extrajudicial Declaration dated 14 January 2025
Dimitra Fanny David to Dani Peretz and Alexia David

Documentary purpose

The appended declaration records an asserted EUR 12 million loan, an alleged EUR 11 million outstanding balance, cited witness affidavits and Greek criminal complaint file E23-351. It is submitted for authentication, financial tracing and verification of the referenced proceedings; it is not presented as a final adjudication.



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 refi
Claimant without

3. The matter is adj

4. The shall have ca

Rene Williams
Approved
7.11.2025

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

Compose

Inbox 356,139

Starred

Snoozed

Important

Drafts 2,421

Purchases 2,678

More

Labels

[Imap]/Drafts

CEO@ETV.COM 2

FilmOn

Investors

KB JUDGES LISTINGS 1

Notes

Office 47

PAYPAL 11,308

FilmOn Office

SUBS

SUPPORT 47,076

VARIETY 83

More

01/7434911/25

Inbox x



Caleb.Pinkham@met.police.uk

to me

Hi Alki,

DC DUMPLETON is now in charge of your case as I've moved team

Kind regards,

T/DC Pinkham P268883 – Charing Cross CSU

Web: www.met.police.uk

Email: Caleb.Pinkham@met.police.uk

Address: Charing Cross Police Station, Agar Street, W



NOTICE - This email and any attachments are solely for the intender in this email or in any attachment without the permission of the sender. Specified personnel are authorised to conclude binding agreements. If viruses are present in this email, its security and that of any attachments are not guaranteed.

Reply

Forward



SOFOS Law Firm

Asklepiou Str. 6 – 8
Athens GR 10680
Tel. +302103633322
www.sofos.com.gr

BEFORE ANY COMPETENT COURT OR AUTHORITY AND BEFORE
MULTI-MEMBER COURT OF FIRST INSTANCE OF ATHENS

EXTRAJUDICIAL DECLARATION - WITH RESERVATION OF RIGHTS

Dimitra Fanny David, resident Nea Erthraia, Attiki, Chimaras Street Nr 5, Greece

TO

1. **Dani Peretz**, temporary resident of Switzerland, Founex, Route de Céligny
10 1297, Founex.
2. **Alexia David**, temporary resident of Switzerland, Founex, Route de Céligny
10 1297, Founex.

*Notified to: Rémi Sacerdote, Attorney-of-Law, Partner of Kellerhals Carrard
Geneva, resident of Geneva, Rue François-Bellot, 6 CH-1206 Genf, Tel. +41 58 200
32 00*

Athens, 14.1.2025

I have recently been informed about the announcement, referring to an acquisition of Lisi Group Ltd., a Bermuda company listed on the Hong Kong Stock Exchange, with the Company EMERALD GLOBAL, a Bermuda Company owned by Emerald Luxembourg, and MANUKURA (CMCI) Limited ("The Subscriber"), aiming a capital increase in Lisi Group Ltd ("The Company").

According to the said announcement, on 15 September 2024 Lisi Group LTD entered into a Subscription Agreement with the Subscriber pursuant to which the Company has conditionally agreed to allot and issue to the Subscriber, and the Subscriber has conditionally agreed to subscribe for, an aggregate of 800,000,000 Subscription Share under General Mandate.

You are also aware that a lawsuit has been filed against you for damages in tort. I was surprised to learn about the allegations in the written proposals of the second of you, which stated that the loan of EUR 12,000,000 granted by me to Willfull Company was not a loan, but an investment!

As you are well aware, the UK-based company Willful Holdings Ltd, owned by both of you, has already been dissolved as of February 2024.

I have executed as Lender a loan agreement of an amount of 12,000,000 Euros (of which 1.000.000 only has been repaid) with the Company Willful Holdings Ltd, but the amount of 11.000.000 Euros was never repaid until today. My witness to the court Mrs Shulamit Salant, who testified by Affidavit, states in her Affidavit no. 2563/18.10.2024 that she signed loan agreements, in accordance with the instructions and orders of Dani Peretz, therefore confirming that it was indeed a loan. Furthermore, my witness to the court Mr Hachim Badji, in his Affidavit no. 2068/22.10.2024, similarly confirms that it was a loan and not an investment at all, since he even stated "...especially when Dani sent me twice to meet with Dimitra's lawyer in Geneva, who explained to me that Demetra was owed 11 million dollars. The lawyer wondered how the Willful group would return this money?" Therefore, all parties were talking about a RETURN OF MONEY - therefore a loan - and not a return of profits (from an investment participation).

Additionally, you are aware that I have filed the criminal complaint under file number E23-351 against the first of you, for attempted fraud in court, specifically during the discussion of the application for interim measures on which the above decision was issued and criminal proceedings have already been brought against the first of you, for attempted criminal fraud in the Court and the case is awaiting by the Investigating Judge as evidenced by the criminal case progress CERTIFICATE



of First Instance Prosecutor's Office of Chalkida. The progress of the criminal proceedings at this stage constitutes proof that my criminal complaint is well-founded and that there are serious indications of criminal offenses.

My interests are infringed by this merger, as we are already currently in litigation before the Greek courts, and while you know that you owe me 11,000,000 Euros plus interest plus expenses which you have clearly admitted in your written submissions, you still refuse to repay, instead you are «redirecting» this money to further «investments», causing intentionally further damages to me and my interests by making my claim unsecure.

The above conduct, namely the transfer of funds to other companies, such as Lisi Group Ltd as it has recently come to my knowledge in this case, while there is an overdue and receivable debt to me, amounting to 11.000.000 Euros, establishes your responsibility for the offense of misrepresenting and abusing creditors by intention.

FOR THOSE REASONS

and with express reservation of all my legal rights

- I HEREBY REQUEST the return of the amount of EUR 11.000.000 with interest and expenses to my personal bank account, by 30/1/2025, *otherwise*

- I HEREBY DECLARE that I reserve the right to use all my legal rights in general to defend my legitimate interests before the Greek courts and the Hong Kong Stock Exchange Commission.

The competent Judicial bailiff is instructed to duly serve this document on the Athens Public Prosecutor on behalf of Dani Peretz, temporary resident of Switzerland, Founex, Route de Céligny 10 1297, Founex, on behalf of Alexia David, temporary resident of Switzerland, Founex, Route de Céligny 10 1297, Founex and on behalf of Rémi Sacerdote, Attorney-of-Law, Partner of Kellerhals Carrard Geneva, resident of Geneva, Rue François-Bellot, 6 CH-1206 Genf, Tel. +41 58 200 32 00, for their knowledge and for the legal consequences, copying the entire text of this document in the service report.

Athens, 14th January 2025

The out-of-court declarant



Dimitra Fanny David

9:48



< 271



Pelicano 2020 >

Jun 18, 2022 at 3:02 PM

I'm on the PCH and it's loaded with traffic I'll be there soon

Jun 20, 2022 at 12:52 AM

shockya.com



Not Delivered

Mar 11, 2023 at 4:28 PM

Los Angeles

Other State Bar employees and members of the agency's governing board also secretly took gifts and other perks from Girardi, the investigators found. The report revealed a previously "not well known" relationship between Girardi and a State Bar prosecutor, Murray **Greenberg**, who worked at the agency for more than 30 years.

Girardi gifted the prosecutor with meals at Morton's, invitations to Girardi's Super Bowl, Christmas and Thanksgiving parties, and tickets to concert performances by Adele and Santana, investigators found. He did not list the presents on disclosure forms as required by the State Bar.

A Girardi Keese employee recalled **Greenberg** visiting the law firm's Wilshire Boulevard frequently for closed-door meetings with the powerful attorney. **Greenberg**, who oversaw the intake department for complaints for years, was involved in closing at least six complaints against Girardi.



Subject

Text Message





Pelicano Contact >

iMessage

May 25, 2023 at 10:18 AM

4310 Ventura Canyon
Ave, Unit 12A, Sherman
Oaks CA 91423

<https://www.dispatch.com/story/news/2008/07/03/man-gets-18-years-for/23304935007/>

(713) 819-7439. Mary Tibshraeny

This guy tried to break into my house. He's a killer.

 4 Photos

Subject

iMessage



9:51



Pelicano Contact >

4 Photos



Get this to Anthony please

May 25, 2023 at 1:14 PM

Subject

iMessage



9:51



Pelicano Contact >



Get this to Anthony please

May 25, 2023 at 1:14 PM

And who are you?

Aaa

Delivered

Subject

iMessage



9:51



Pelicano 2020 >

Text Message
Jun 16, 2022 at 11:26 PM

23768 Malibu Road,
90265



Not Delivered

23768 Malibu Road,
90265



Not Delivered

+1 (310) 562-5536



Not Delivered

23768 Malibu Road,
90265



Not Delivered

Jun 18, 2022 at 3:02 PM

Subject

Text Message



9:52



< 271



Pelicano 2020 >

Jun 18, 2022 at 3:02 PM

I'm on the PCH and it's loaded with traffic I'll be there soon

Jun 20, 2022 at 12:52 AM

shockya.com



Not Delivered

Mar 11, 2023 at 4:28 PM

Los Angeles Times

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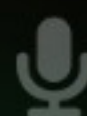
A Girardi Keese employee recalled **Greenberg** visiting the law firm's Wilshire Boulevard frequently for closed-door meetings with the powerful attorney. **Greenberg**, who oversaw the intake department for complaints for years, was involved in closing at least six complaints against Girardi.

In one case, **Greenberg** instructed a colleague to "make it go away," according to the report.



Subject

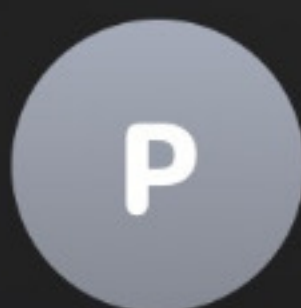
Text Message



9:52



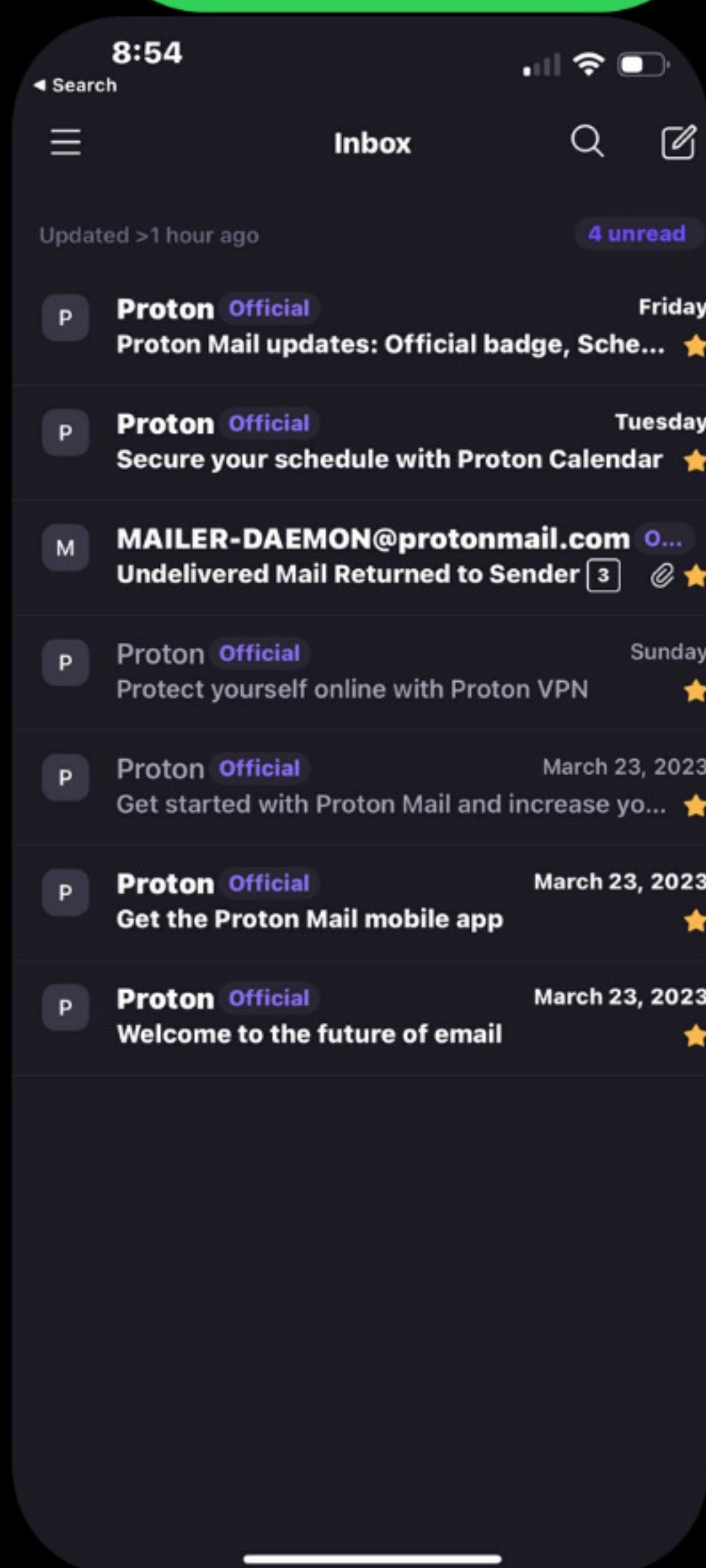
< 271



Pelicano 2020 >

I can't stand the another mail client

I used it.



All the bounce backs

Subject

Text Message



9:56



P

Edit

Pelicano 2020



message



mobile



video



mail



pay

Contact Photo & Poster

mobile

+1 (310) 562-5536

home

+1 (323) 883-0257



Favorites



Recents



Contacts



Keypad



Voicemail

1031

9:57



Edit

Pelicano Contact



message



call



video



mail



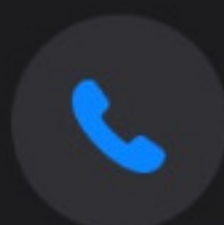
pay

Contact Photo & Poster

main

+1 (323) 715-5309

FaceTime



Favorites



Recents



Contacts



Keypad



Voicemail

1031



Submitted Date:14/07/2026 15:07

Filed Date:14/07/2026 15:07

Fees Paid:52.00

**IN THE HIGH COURT OF JUSTICE
EASTERN CARIBBEAN SUPREME COURT
ANTIGUA AND BARBUDA
CIVIL DIVISION**

ALKIVIADES ANDREW DAVID (also known as Alki David) <i>Claimant in person</i>	Claim No.: [TO BE ASSIGNED]
- and -	
(1) THE ATTORNEY GENERAL OF ANTIGUA AND BARBUDA (2) STEADROY BENJAMIN (3) ZACHARY PHILLIPS <i>Defendants</i>	

CLAIM FORM AND PARTICULARS OF CLAIM

**DOCUMENT-PROVENANCE, PUBLIC-OFFICE, PRESERVATION,
PROCEDURAL-ACCESS, AND FORENSIC-DISCLOSURE CLAIM**

Core proposition: This case concerns the integrity of the judicial record. The Claimant seeks an authentic record, a complete audit trail, preservation of evidence, targeted disclosure, reasonable procedural access, and adjudication on evidence rather than assumption. Broader political, commercial, environmental, media, and international matters are pleaded only as context, motive, notice, preservation pathways, or matters requiring investigation - not as adjudicated facts.

IMPORTANT: The Claimant must insert the assigned claim number, address for service, and any required filing fee or fee-relief material before lodgment.

INDEX

Select any shaded item to jump to that section

1. Brief Details and Value

2. Parties, Capacity, and Material Qualifications

3. Procedural Background and Prior Formal Notice

4. Original Record, UPP Defendants, and Contested Version

5. Attorney General Participation, Notice, and Document Provenance

6. Justice for Asot Michael and Preservation of Evidence

7. Motive and Alternative Inferences Requiring Disclosure

8. Dallas / Eastern District of Texas Notice and Evidentiary Use

9. Direct Notice, Public Dissemination, and Procedural Access

10. Causes of Action

11. Causation, Prejudice, and Loss

11A. Williams Order, 73 Defaults, Appeal, and Reserved Loss Claim

12. Relief Sought

13. Statement of Truth

16. Short Prayer and Forensic Summary

Exhibit X - Event-by-Event Causation Schedule

Index of Exhibits

14. Schedule A - Master Evidence Matrix

15. Exhibits

1. BRIEF DETAILS AND VALUE

The Claimant seeks declaratory, preservation, disclosure, procedural-access, forensic-document, and damages relief arising from the alleged handling of disputed court documents; the alleged absence of a complete audit trail; the response to repeated notice; and related public-office conduct.

The claim exceeds EC\$5,000. Personal damages are reserved for assessment and expert proof. Any national, environmental, or public-project relief is sought only to the extent the Claimant establishes standing, lawful authority, causation, and a recognized cause of action. No asserted development valuation is pleaded as a presently liquidated or adjudicated public debt.

The principal immediate relief is narrow and practical: identify the authentic record; preserve the native evidence; disclose the chain of custody; identify each custodian and decision-maker; provide reasonable accommodations; and permit the disputed facts to be tested fairly.

2. PARTIES, CAPACITY, AND MATERIAL QUALIFICATIONS

1. The Claimant is a media and technology entrepreneur, environmental project developer, and litigant in person with a documented traumatic brain injury. The condition does not prevent him from litigating, but it requires clear written directions, reasonable time, accessible scheduling, breaks, and other proportionate procedural adjustments.

2. The Claimant states that Prime Minister Gaston Browne appointed him to serve as Ambassador to the Green Economy for the Government of Antigua and Barbuda. In that capacity, he developed, promoted, and represented green-economy, carbon-market, environmental-restoration, and national-development initiatives. He will rely on the appointment instrument, government correspondence, public statements, and witness evidence to establish the appointment's scope and duration.

3. The Claimant relies on the appointment and project records only to explain his personal involvement, notice, and interest in preservation. He does not in this claim assert authority to bind the Government, enforce any sovereign order, or recover public assets absent a specific legal instrument and proof of standing. Any legal effect of the appointment remains a matter for evidence and applicable law.

4. The Claimant is the author of the Carbon Compliance Market Act 2025 placed on the court record in ANUHCv2025/0149. He relies on it as contemporaneous evidence of the framework he developed for Antigua and Barbuda's green economy, not as enacted legislation unless formal enactment is proved. The First Defendant is the proper Crown or public-office defendant. The Second and Third Defendants are sued personally only for conduct lawfully attributable to them individually; official participation alone is not pleaded as wrongdoing.

3. PROCEDURAL BACKGROUND AND PRIOR FORMAL NOTICE

5. On 17 April 2025, the Claimant filed the original Claim Form and Statement of Claim in ANUHCv2025/0149. The Claimant states that the original document named fourteen defendant categories, including at Defendant No. 13 the Executive Members of the United Progressive Party (UPP), Antigua and Barbuda, and at Defendant No. 14 DOES 1-100.

6. On 3 February 2026, the Claimant filed a Notice of Factual Clarification identifying the UPP executive defendants, the asserted local nexus, and judicial-comity context. The filing was intended to preserve the Claimant's position concerning the original parties and completeness of the record.

7. The Claimant has repeatedly placed the disputed provenance, preservation, and alleged omission issues before court personnel, the Attorney General's Chambers, law-enforcement recipients, CID personnel, government recipients, and other relevant custodians.

8. The Claimant does not ask the Court to infer deliberate falsification from a visual difference alone. He asks for authentication, native files, metadata, version history, chain of custody, transmission records, document hashes, and testimony.

4. ORIGINAL RECORD, UPP DEFENDANTS, AND CONTESTED VERSION

9. The side-by-side comparison exhibited in the bundle shows the original filed defendant list and a later court-facing or draft-order caption. The original image visibly includes the UPP executive category; the later image proceeds from John McClain to DOES 1-100.

10. The Claimant alleges that the omission was capable of affecting the analysis of residence, local nexus, forum convenience, jurisdiction, and judicial comity. The precise legal consequence remains for the Court.

11. The requested determination is forensic and neutral: which version was filed; which version was supplied to chambers; who supplied it; what changes occurred; when they occurred; which systems preserved the files; and whether any judicial decision relied upon an incomplete or different version.

5. ATTORNEY GENERAL PARTICIPATION, NOTICE, AND DOCUMENT PROVENANCE

12. In ANUHCV2025/0149, the Attorney General appeared officially as amicus curiae through legal representatives, including Crown Counsel Zachary Phillips, and addressed jurisdiction and reasonable cause of action.

13. That official participation establishes direct institutional notice and makes the Attorney General's Chambers a likely custodian of submissions, correspondence, instructions, bundle versions, drafts, indexes, cover emails, and transmission records within its possession or control.

14. The Claimant relies upon communications involving court or chambers personnel concerning the source, assembly, supply, or curation of relevant documents. Each communication will be exhibited in full and quoted accurately.

15. The Claimant alleges that, after express notice of the discrepancy, the responsible public officers did not provide a complete and satisfactory audit trail. He seeks Registry-stamped originals; every amended or converted version; all native Word and PDF files; metadata; document hashes; bundle indexes; draft orders; and records identifying each person who selected, edited, converted, transmitted, received, reviewed, or relied upon the materials.

16. The Claimant further relies upon an apparent inconsistency between documented official participation and a later statement attributed to Steadroy Benjamin that he had never been involved in any matter concerning the Claimant. The inconsistency is pleaded as a matter requiring clarification and disclosure, not as proof of criminal conduct.

6. JUSTICE FOR ASOT MICHAEL AND PRESERVATION OF EVIDENCE

17. The late Honourable Asot Michael was the Claimant's close friend and business or project partner. The Claimant states that he and Mr. Michael were expected to be together on the day of Mr. Michael's death. This gives the Claimant a direct personal connection to the surrounding chronology and a profound interest in ensuring that all relevant evidence is preserved and properly investigated.

18. Following Mr. Michael's death, the Claimant spoke with attorney Leon Chaku Symister, who represents Alexta Francis, the person charged in connection with Mr. Michael's death, and with Nigel Michael, Mr. Michael's son. The Claimant recalls discussing with Mr. Symister whether the circumstances could indicate political motivation. This recollection is not pleaded as an admission, a formal position of counsel, or an adjudicated fact.

19. The Claimant states that Nigel Michael shares the concern that Mr. Francis had no ordinary or legitimate reason to be present in the house at the relevant time. The Claimant further states that concerns were raised that Mr. Francis may have been coerced, manipulated, directed, or used by others. These are serious matters requiring investigation, not established findings, and the Claimant does not ask this civil Court to determine Mr. Francis's guilt or innocence.

20. The Claimant has identified communications, project records, political and commercial conflicts, witness pathways, and other material that he believes warrant independent examination. He seeks preservation and lawful disclosure of relevant communications, telephone records, financial records, witness accounts, movements, instructions, relationships, and evidence capable of establishing why Mr. Francis was present, whether he acted independently, and whether any other person influenced, assisted, directed, or benefited from the events.

21. Despite repeated notice, the Claimant has not received a substantive account demonstrating that these evidentiary pathways have been fully preserved, referred, and independently investigated. The Claimant does not allege in this civil claim that the Attorney General personally committed or directed the homicide. His complaint is that no adequate preservation, referral, investigation record, or substantive response has been disclosed to him.

22. The Claimant therefore respectfully seeks justice for Asot Michael through a lawful, independent, evidence-led investigation, together with preservation, disclosure, referral, and accountability sufficient to ensure that no relevant record, witness account, financial trail, communication, or project interest is ignored or lost.

7. MOTIVE AND ALTERNATIVE INFERENCES REQUIRING DISCLOSURE

24. The Claimant does not plead that the precise subjective motive of any Defendant has been conclusively established. Motive is pleaded as an inference from the chronology, official participation, notice, disputed record, responses, and identified interests. The alternatives below may be cumulative or mutually exclusive and require disclosure.

A. Institutional self-protection

If personnel within the Attorney General's Chambers received, assembled, supplied, or relied upon a materially incomplete version, there would be an institutional incentive to minimize involvement, resist disclosure, or avoid creating an audit trail exposing administrative or professional failure.

B. Preservation of the amicus litigation position

Because the Attorney General's representatives addressed jurisdiction and reasonable cause of action, the omitted local-defendant category may have complicated the position advanced. A possible motive for resistance to correction would be avoidance of reopening the forum or jurisdiction analysis.

C. Political sensitivity

The omitted category concerned executive members of a major political party. The presence or absence of that category could carry political consequences and could create incentives to limit scrutiny, exposure, or adjudication.

D. Reputational and institutional exposure

Acknowledging an incomplete record or an inability to account for its provenance could expose the Attorney General's Chambers, the Registry, or other institutions to criticism. The Claimant pleads this as a possible explanation for distancing, delay, or minimization.

E. Commercial and intellectual-property relationships

The Claimant's filings identify entertainment, hologram, media, licensing, offshore intellectual-property, and related commercial pathways. Any motive based on protecting such relationships must be tested through specific communications, agreements, payments, ownership records, and disclosure rather than assumed.

F. Control of green-economy and national-development opportunities

The Claimant alleges that his projects and his partnership with Asot Michael involved potentially substantial national opportunities. Political or commercial actors may have had incentives to control, redirect, appropriate, delay, or diminish those opportunities. This remains an investigatory pathway requiring primary evidence.

G. Personal hostility or retaliation

The Claimant alleges that direct confrontation, removal from an office, dismissive responses, and failure to engage meaningfully may support an inference of hostility. Hostility is legally relevant only if it influenced a public

Consolidated inference: The circumstances provide a proper basis for targeted disclosure and forensic examination to determine whether the conduct resulted from mistake, institutional defensiveness, political pressure, commercial alignment, personal retaliation, or deliberate misuse of public office. The Claimant further states that materials identified in his SDNY filings raise a broader concern - pleaded only as an inference requiring investigation - that coordinated private actors and internationally connected interests may have sought to destabilize or improperly influence Antigua and Barbuda's institutions and development priorities. He specifically relies on alleged courtroom and litigation activity by persons he associates with Daphne Barak. No foreign court is said to have adopted that contention, and the Claimant seeks disclosure and authentication rather than a finding based on assertion alone.

8. DALLAS / EASTERN DISTRICT OF TEXAS NOTICE AND EVIDENTIARY USE

25. The Claimant is also a pro se plaintiff or interested litigant in proceedings in the United States District Court for the Eastern District of Texas, Sherman Division, including Civil Action No. 4:23-cv-00435-SDJ-BD.

26. The Claimant intends to notify that Court of this Antiguan filing and, where permitted, rely upon the filing and its authenticated exhibits as evidence of chronology, notice, preservation demands, asserted motive, witness-custodian pathways, and the relationship between Antigua-based events and his Texas allegations.

27. This pleading does not ask the Antiguan Court to decide the merits of the Texas case, and it does not represent that the Texas Court has adopted the Claimant's allegations. Likewise, any use in Texas remains subject to the Federal Rules of Evidence, applicable procedure, judicial notice standards, authentication, relevance, privilege, and the orders of that Court.

28. To facilitate legitimate cross-court use, the Claimant seeks a reliable certified record, stable exhibit numbering, native-file preservation, document hashes where available, and clear identification of each custodian and source.

9. DIRECT NOTICE, PUBLIC DISSEMINATION, AND PROCEDURAL ACCESS

29. The Claimant alleges sustained direct notice to Legal Affairs, court personnel, CID, named investigators, government recipients, political figures, and custodians through filings, emails, messages, attachments, and personal communications.

30. Public articles and notices are relied upon only for publication, chronology, consistency, notice, and opportunity to respond. Publication is not pleaded as proof that every underlying allegation is true and is not a substitute for formal service.

31. The Claimant gave notice of his documented TBI and requested practical adjustments needed for meaningful participation. He does not seek relaxation of substantive pleading or evidentiary standards. He seeks equal procedural access.

10. CAUSES OF ACTION

A. Misfeasance in Public Office

32. The Claimant alleges that personally named public officers exercised or purported to exercise public functions in connection with receipt, assembly, transmission, presentation, retention, investigation, or response to the contested materials. The Claimant alleges targeted bad faith or reckless indifference only insofar as it can reasonably be inferred from identified notice, custody, responses, continued conduct, and disclosure. Official participation, silence, administrative error, or an adverse legal position alone is not pleaded as sufficient.

B. Declaratory, Preservation, and Record-Integrity Relief

33. The Claimant seeks declarations and preservation relief concerning the identity, provenance, completeness, custody, authenticity, and use of the disputed court documents and related records.

C. Negligence or Breach of Duty - Alternative Pleading

34. If Antiguan law recognizes a private duty in the pleaded circumstances, the Claimant alleges negligent handling, preservation, communication, or referral of identified records after actual notice of a foreseeable risk of procedural or personal injury.

D. Procedural Access and Reasonable Accommodation

35. The Claimant seeks prospective case-management accommodations. Any damages claim will be confined to a recognized constitutional, statutory, or common-law cause of action and particularized against the responsible decision-maker.

E. Ancillary Disclosure Concerning Asot Michael and Related Evidence

36. The Claimant seeks disclosure and preservation concerning his partnership with Asot Michael and official responses to the Claimant's referrals, not a civil determination of criminal responsibility for the homicide.

11. CAUSATION, PREJUDICE, AND LOSS

37. The Claimant alleges that use of or reliance upon a materially incomplete record, together with failure to provide an audit trail after notice, impaired his ability to present the local nexus, protect claims, seek review, authenticate evidence, and maintain confidence in the official record.

38. The Claimant will provide an event-by-event causation schedule identifying the alleged act, date, responsible person, immediate procedural consequence, corrective work, expense, lost opportunity, medical effect, and supporting exhibit.

39. Personal losses may include reasonable reconstruction and litigation costs, delay-related losses, specific lost transactions, impairment of reputation or financing supported by third-party records, and medically supported injury or aggravation.

40. National, environmental, or public-project losses will not be recovered by the Claimant unless standing and authority are proved. Otherwise, those matters are relied upon only as motive, context, and evidence of the scale of the opportunities allegedly impaired.

12. RELIEF SOUGHT

1. A declaration identifying the authentic original and provenance of each contested version;
2. Preservation of native files, emails, attachments, pleadings, indexes, metadata, audit logs, Registry records, chambers correspondence, Attorney General's Office communications, CID records, and device or cloud backups;
3. Forensic comparison of all relevant versions, subject to lawful privilege and confidentiality protections;
4. Identification of each person who selected, edited, converted, transmitted, received, reviewed, relied upon, investigated, or declined to investigate the contested materials;
5. Preservation and targeted disclosure concerning Asot Michael, his partnership and green-economy plans with the Claimant, their communications, project structures, ownership or succession interests, and official responses to the Claimant's referrals;
6. Production of records showing what scrutiny, referral, preservation, or investigation was undertaken after the Claimant placed the Attorney General and other authorities on notice;
7. Prospective reasonable procedural accommodations for the Claimant's documented TBI;
8. Damages for any properly pleaded and proved cause of action;
9. Interest, costs, and such further or other relief as the Court considers just.

13. STATEMENT OF TRUTH

I believe that the facts stated in these Particulars of Claim are true. Where matters are identified as allegations, inferences, estimates, or the Claimant's position, I honestly believe there is a proper basis for placing them before the Court. I understand that proceedings for contempt of court may be brought against a person 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.

Signed: _____



ALKIVIADES ANDREW DAVID
Claimant in person

Dated: 14 July 2026

Address for service: [INSERT BEFORE FILING]

11A. WILLIAMS ORDER, PROCEDURAL DEFAULTS, APPEAL, AND RESERVED LOSS CLAIM

41. The Claimant relies on the order of the Honourable Justice Rene Williams dated 6 May 2026 in Claim No. ANUHCv2025/0149 (the Williams Order). The Claimant characterizes it as an order of the High Court of Antigua and Barbuda entered in proceedings brought in his name and involving asserted national-development interests.

42. The Williams Order stayed the Antiguan proceedings on forum grounds. The Claimant pleads that it did not determine the truth or falsity of the substantive allegations, did not adjudicate liability or damages, and did not exonerate any defendant on the merits. The Claimant further pleads that the Order identified the United States or England as the forum in which the substance of the dispute should proceed, subject to the precise terms of the sealed order.

43. The Claimant states that the Williams Order expressly authorized or preserved an appellate route. The Claimant therefore pleads that the stay, the status of the parties, the record-integrity issues, and the consequences of any defaults remain capable of appellate review and have not been extinguished by a merits judgment.

44. The Claimant states that seventy-three defendants had failed to respond or defend in the Antiguan proceedings. He relies on the Registry record, affidavits of service, certificates, docket entries, and related materials to establish the exact procedural status of each defendant. For avoidance of doubt, a procedural default is not pleaded as identical to a final default judgment unless and until the court record establishes that judgment was entered.

45. The Claimant alleges that the pattern of non-response was coordinated or orchestrated. That allegation is pleaded as an inference requiring disclosure and proof, not as an adjudicated finding. Relevant evidence includes communications among defendants or counsel, common instructions, funding arrangements, litigation coordination, service responses, and conduct surrounding the forum application.

46. The Claimant states that an operative order should have been issued or perfected following proceedings on or about 16 January 2026, but was not issued until later. He alleges that the delay impaired his ability to rely on the Antiguan record, pursue appellate or foreign-forum relief, obtain financing, protect transactions, and preserve commercial and national-development opportunities.

47. The Claimant reserves a claim for personal, commercial, and delay-related loss directly caused by any legally actionable delay, record failure, public-office misconduct, or obstruction proved against a proper defendant. He will provide an event-by-event causation and quantum schedule identifying the date, act or omission, responsible person, immediate consequence, mitigation, lost transaction or opportunity, and supporting third-party evidence.

48. The Claimant does not plead that the Williams Order itself awarded damages or converted projected public or development value into an immediately enforceable debt. He relies on it as a binding, appealable, non-merits forum order whose legal effect, together with the default record and alleged delay, must be preserved and accurately presented in Antigua, the United States, or England.

49. The Claimant seeks: (a) certification of the Williams Order and the complete docket; (b) identification of the procedural status of each of the seventy-three defendants; (c) preservation of service, default, correspondence, and forum-application records; (d) clarification that the stay was not a merits adjudication; (e) preservation of appellate and foreign-forum rights; and (f) leave to prove any recoverable loss through proper evidence and legal causes of action.

Important qualification: *The precise wording of the sealed Williams Order, the Registry record, and any appellate authorization controls over this summary. A certified copy should be exhibited before final reliance.*

16. SHORT PRAYER AND FORENSIC SUMMARY

50. This claim is deliberately narrow. The Claimant does not ask the Court, at this stage, to determine broad political, criminal, commercial, or cross-border allegations. He asks the Court to identify the authentic record, preserve the native evidence, disclose the audit trail, determine who handled each material version, and permit disputed facts to be tested by admissible evidence.

51. The immediate questions are forensic: what was filed; what was later supplied or relied upon; whether any material category or party was omitted; when and by whom any alteration, conversion, transmission, or substitution occurred; what systems retain the native files and metadata; and what corrective action followed notice.

52. The Claimant respectfully prays for proportionate relief limited to authentication, preservation, targeted disclosure, identification of custodians and decision-makers, reasonable procedural accommodations, certification of the operative orders and docket, and such damages as may later be proved under a recognized cause of action.

PRAYER

May the Court protect the integrity of its own record, preserve the evidence before it is lost, permit the truth to be tested without assumption or prejudice, and ensure that every party - including a litigant with a documented traumatic brain injury - receives fair and meaningful procedural access.

This prayer is not offered as evidence and does not enlarge the pleaded causes of action. It summarizes the narrow forensic and procedural relief sought.

EXHIBIT X - DRAFT EVENT-BY-EVENT CAUSATION AND PREJUDICE SCHEDULE

This high-level schedule supplements paragraph 38. Each entry remains subject to certified records, invoices, correspondence, medical evidence, third-party transaction documents, standing, duty, causation, remoteness, mitigation, admissibility, and proof.

Date / event	Act or omission requiring proof	Immediate consequence	Prejudice / evidence to be supplied
17 Apr 2025	Original claim filed with fourteen defendant categories.	Operative pleading and local nexus placed on record.	Registry-stamped claim, filing receipt, native file, and service materials.
2025-2026	A later court-facing or draft-order version allegedly omitted the UPP category.	Possible distortion of the jurisdiction and forum record.	Native files, metadata, hashes, version history, cover emails, and custody evidence.
16 Jan 2026	Claimant states an operative order should have issued or been perfected.	Delay in reliance on the court outcome.	Minute, transcript, draft order, correspondence, and proof of the expected date.
3 Feb 2026	Notice of Factual Clarification filed identifying the discrepancy.	Direct notice to court and relevant custodians.	Filed notice, service evidence, acknowledgments, and delivery records.
6 May 2026	Williams Order stayed the Antigua claim on forum grounds without deciding merits.	Foreign-forum reliance and appeal steps became necessary.	Certified order, reasons, appellate language, docket, and related correspondence.
Default period	Claimant states seventy-three defendants failed to respond after service.	Claimant says default-related rights and strategy were affected.	Defendant-by-defendant service/default schedule and Registry certification.
After repeated notice	No complete audit trail was provided to the Claimant.	Additional reconstruction work, delay, and uncertainty.	Preserved correspondence, requests, responses, invoices, and time records.
Cross-jurisdictional use	Claimant sought to rely on the authenticated Antigua record abroad.	Authentication and evidentiary barriers arose.	Texas/SDNY filings, court directions, certification requests, and associated costs.
Medical / access impact	Claimant states delay and uncertainty aggravated TBI-related litigation burdens.	Additional stress, repetition, and accommodation needs.	Focused medical excerpt, accommodation requests/orders, and treating-professional evidence.
Commercial / lost opportunity	Claimant reserves specific delay-related transaction losses.	Potential financing, transaction, or project prejudice.	One transaction at a time: contract, lender record, valuation method, causation, and mitigation.

No item in this schedule is pleaded as a liquidated loss or adjudicated fact. The schedule identifies the evidence required to convert asserted prejudice into provable causation.

INDEX OF EXHIBITS

Exhibit	Date	Description	Bundle page
A-001 / A	17 Apr 2025	Original claim caption and comparison with the contested later version.	12
B-001 / B	3 Feb 2026	Filed Notice of Factual Clarification concerning UPP defendants, geographical nexus, and comity.	13-14
C-001 / C	14 Oct 2025	Claimant-authored Carbon Compliance Market Act 2025, filed as Exhibit AG; not pleaded as enacted law unless enactment is proved.	15-16
D-001 / D	Mar-Jul 2026	Public-notice article and preserved printout, relied on for chronology and notice rather than proof of every assertion.	17-24
E-001	To be certified	Exact amicus order, appearance record, or transcript showing Attorney General participation through Crown Counsel.	To insert
F-001	Various	Court, chambers, Registry, and Attorney General communications concerning source, assembly, custody, and transmission.	To insert
G-001	Various	Asot Michael communications and project records supporting friendship, partnership, chronology, and preservation pathways.	To insert
H-001	Various	Official referral and investigation records concerning evidence supplied after Asot Michael's death.	To insert
I-001	2023-2026	EDTX and SDNY materials relied on only for notice, chronology, alleged relationships, and evidentiary pathways; not foreign-court findings.	To insert
J-001	2023-2026	Focused TBI medical excerpt, MRI summary, or prior accommodation order.	To insert
X-001	13 Jul 2026	Draft Event-by-Event Causation and Prejudice Schedule supplementing paragraph 38.	10

Attorney General participation. A certified amicus order, appearance transcript, or Registry record should replace any secondary description before final evidentiary reliance.

TBI support. Exhibit J-001 should be limited to the diagnosis or imaging finding, functional litigation impacts, and accommodations previously recommended or ordered.

Consistent naming. The Attorney General is sued in the appropriate representative capacity. Steadroy Benjamin and Zachary Phillips are named individually only for specific acts, knowledge, decisions, or states of mind pleaded against them.

14. SCHEDULE A - MASTER EVIDENCE MATRIX

ID	Item	Proposition	Custodian / Status
A-001	Original Claim Form - 17 Apr 2025	Original fourteen-category caption and UPP category	Registry / certify
A-002	Contested later version	Omission and provenance issue	Chambers / AG / Registry
B-001	Notice of Factual Clarification - 3 Feb 2026	Preserves original naming and local nexus	Filed ECSC record
C-001	Carbon Compliance Market Act exhibit	Contemporaneous green-economy framework	
D-001	Public-notice article and preserved printout	Publication, chronology, notice	Truth disputed
E-001	Court / chambers / Joseph communications	Source, assembly, or curation of materials	Exact originals required
F-001	Attorney General amicus order / appearance record	Official participation and institutional notice	Certified order required
G-001	Asot Michael communications and project records	Partnership, introduction, green-economy plans, preservation	Claimant / government / third parties
H-001	Official homicide investigation and referral records	Scope of scrutiny, preservation, and response	Police / CID / Legal Affairs
I-001	ED Texas filings and docket materials	Cross-court notice, chronology, and evidentiary use	Federal docket; not findings
J-001	TBI medical evidence and accommodation requests	Procedural access and prejudice	Medical custodians / filed notices

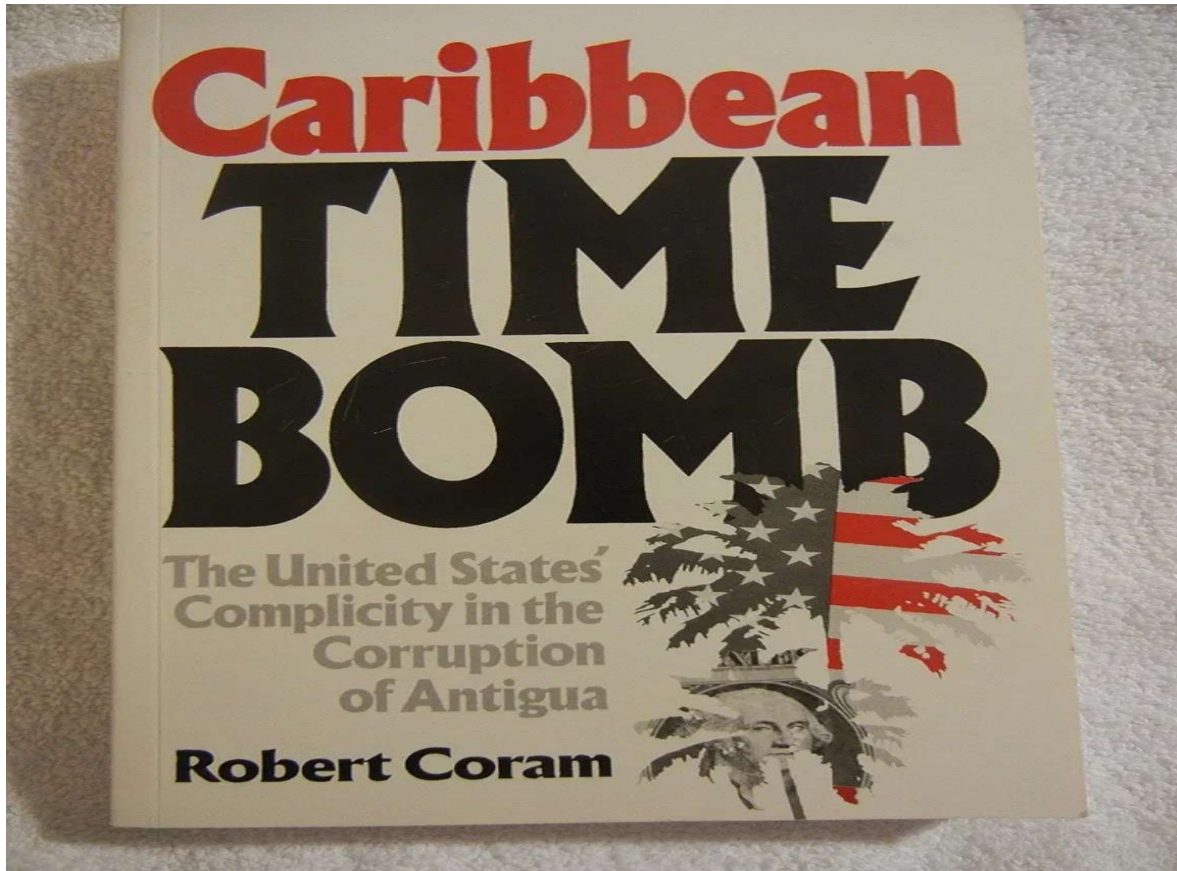
15. EXHIBITS

The exhibits appended after this page are reproduced from the previously assembled filing bundle. Their inclusion establishes the content and existence of the source materials. Disputed factual assertions remain subject to authentication, admissibility, and proof.

Exhibit navigation: Use the PDF bookmark panel or the clickable menu. The appended exhibits retain their original page appearance.

EXHIBIT E - COURT ORDER RECORDING ATTORNEY GENERAL PARTICIPATION

Image supplied by the Claimant. It should be replaced with a certified or Registry-issued copy before final evidentiary reliance if available.



EXHIBITS

The following exhibits are reproduced for review. Their inclusion establishes the content and existence of the source material; disputed factual assertions remain subject to proof.

EXHIBIT A - SIDE-BY-SIDE CAPTION COMPARISON

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
2. **GLORIA ALLRED**, of Allred, Maroko & Co
3. **DANI PERETZ**, of Geneva, Switzerland &
4. **SHARI REDSTONE**, of Paramount Glob
5. **DAPHNE BARAK**, of Beverly Hills, Calif
6. **MICHAEL AVENATTI**, formerly of Eagan
7. **TOM GIRARDI**, incarcerated at Federal I
8. **BLACK CUBE LTD**, on Israeli-owned pri
9. **LIMEWIRE NFT HOLDINGS**, with assets
10. **EDGAR BRONFMAN SR. (Deceased)**, e
11. **JOHN BRANCA**, of West Hollywood and
12. **JOHN MCCLAIN**, music executive, of Lo
13. **THE EXECUTIVE MEMBERS OF THE UN**
14. **And DOES 1-100**

Defendants

H COURT OF JUSTICE

49

VIADES 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

DRAFT ORDER

LE JUSTICE RENE WILLIAMS (IN

DAY October 2025

DAY 2025

Demonstrative comparison of the original filed defendant list and a later draft-order caption. The underlying source documents, not the composite image alone, must be authenticated and compared.

Case Number :ANUHCV2025/0149



IN THE HIGH COURT OF JUSTICE
EASTERN CARIBBEAN SUPREME COURT
ANTIGUA AND BARBUDA

Submitted Date:03/02/2026 09:50

Claim No.: ANUHCV2025/0149

Filed Date:03/02/2026 09:51

BETWEEN
ALKIVIADES DAVID
Claimant

Fees Paid:12.00

-and-

[DEFENDANTS AS ORIGINALLY NAMED]

**NOTICE OF FACTUAL CLARIFICATION
(UPP EXECUTIVE DEFENDANTS, GEOGRAPHICAL NEXUS, AND JUDICIAL COMITY)**

1. The Claimant files this Notice solely to assist the Court by clarifying factual matters apparent on the record concerning the parties originally named, geographical nexus, and practical context relevant to forum convenience and judicial comity.

A. ORIGINAL NAMING OF THE UPP EXECUTIVE DEFENDANTS

2. The Original Claim Form filed on 17 April 2025 named fourteen (14) Defendants.

3. Defendant No. 13 is expressly pleaded as: *"THE EXECUTIVE MEMBERS OF THE UNITED PROGRESSIVE PARTY (UPP), Antigua & Barbuda."*

4. The designation above constitutes the executive branch of the United Progressive Party, named as a Defendant class resident within Antigua and Barbuda.

5. Defendant No. 14 was pleaded separately as *"AND DOES 1–100"* and was later assigned to Gary Dordick and Dordick Law.

B. GEOGRAPHICAL NEXUS AND PRACTICAL ACCESSIBILITY

6. The Defendants include persons resident in Antigua and Barbuda as well as persons situated across multiple international jurisdictions.

7. Antigua and Barbuda is a jurisdiction that is practically accessible to international parties by modern means of travel, electronic communication, and remote participation, and presents no material impediment to engagement with the proceedings.

8. The proceedings are properly seized in this jurisdiction, and the presence of locally resident Defendants establishes a clear territorial nexus.

C. JUDICIAL COMITY AND CONTEXT

9. The Claimant notes, as factual context, that determinations arising from these proceedings have relevance to, or are of interest in, other jurisdictions where related civil or federal proceedings exist or are contemplated.

10. In that context, the orderly exercise of jurisdiction by this Honourable Court serves the interests of judicial comity, legal certainty, and coordinated administration of justice, rather than fragmenting related issues across multiple forums.

Exhibit B, source page 1

11. This Notice is filed without submission or argument, without criticism of any party or amicus, and solely to ensure the accuracy and completeness of the Court record.

Dated: 03 February 2026

Filed by:

/s/ **ALKIVIADES DAVID**

Claimant in Person

Digitally signed by Alkiviades David on 03 February 2026

Exhibit B, source page 2

Case Number :ANUHCV2025/0149



EXHIBIT AG

Submitted Date:14/10/2025 09:46

Antigua and Barbuda Carbon Compliance Market Act (2025) Filed Date:14/10/2025 09:48

Fees Paid:17.00

An Act to establish a legal framework for the generation, verification, registration, and trading of carbon credits within Antigua and Barbuda, and to align national carbon market mechanisms with the country's Nationally Determined Contributions (NDCs) under the Paris Agreement.

1. Short Title

This Act may be cited as the Carbon Compliance Market Act, 2025.

2. Purpose

The purpose of this Act is to establish Antigua and Barbuda's national compliance carbon market, regulate carbon credit issuance and trade under Article 6 of the Paris Agreement, and promote investment in blue-carbon and green-carbon projects.

3. Definitions

Carbon Credit means a tradable certificate representing one metric ton of carbon dioxide reduced, sequestered, or avoided. Authorized Project Developer includes entities licensed by the Ministry of Environment, such as the SwissX Sovereign Wealth Fund.

4. Establishment of National Carbon Market Authority

There is hereby established a body corporate known as the Antigua and Barbuda Carbon Market Authority (ABCMA). The Authority shall oversee certification, approve methodologies, and coordinate with the UNFCCC.

5. Authorization of Project Developers

The Minister may designate qualified entities as Authorized Project Developers responsible for MRV and community benefit sharing.

6. Eligible Projects

Projects qualifying for compliance credits include blue-carbon restoration, biochar, regenerative agriculture, renewable energy, and waste-to-energy initiatives.

7. Verification and Certification

Verification must be conducted by an accredited Designated Operational Entity (DOE). Certified credits shall be recorded in the ABCR with full traceability.

8. Ownership and Transfer

Carbon credits are recognized as financial instruments. Ownership vests in the project proponent unless otherwise specified.

9. Government Revenue and Benefit-Sharing

Ten percent of proceeds from international transfers shall accrue to the National Climate Resilience Fund and ten percent to community programs.

10. Integration with International Systems

The ABCMA shall liaise with the UNFCCC to register Antigua's participation under Article 6 mechanisms.

11. Legal Recognition of Digital Tokens

Carbon credits may be issued digitally on blockchain systems, equivalent to paper certificates.

12. Offences and Penalties

Fraudulent issuance or falsification of MRV data shall attract fines up to EC\$500,000 or imprisonment for up to 5 years.

13. Transitional Provisions

Existing voluntary credits may be grandfathered into the compliance market within six months of this Act's commencement.

14. Regulations

The Minister may make regulations prescribing MRV standards, project approval procedures, and benefit-sharing frameworks.

15. Commencement

This Act shall come into force on such date as the Minister may, by Order published in the Gazette, appoint.

Explanatory Memorandum

This Act provides a comprehensive foundation for Antigua and Barbuda's entry into the global compliance carbon market. It formalizes the issuance, verification, and trading of carbon credits generated by national projects in blue carbon, sargassum composting, biochar, and renewable energy. The Act strengthens economic resilience, supports climate adaptation, and empowers local communities through carbon revenue-sharing and sustainable job creation.


Tammie Gage
Commissioner of Oath
Antigua and Barbuda

Exhibit C, source page 2

Mon, Jul 13th, 2026 6:10:59 AM



REAL TALK

NEWS

STEADROY BENJAMIN – ANTIGUA’S TRAITOR: A Court Record, a Complaint, and a Question That Won’t Go Away

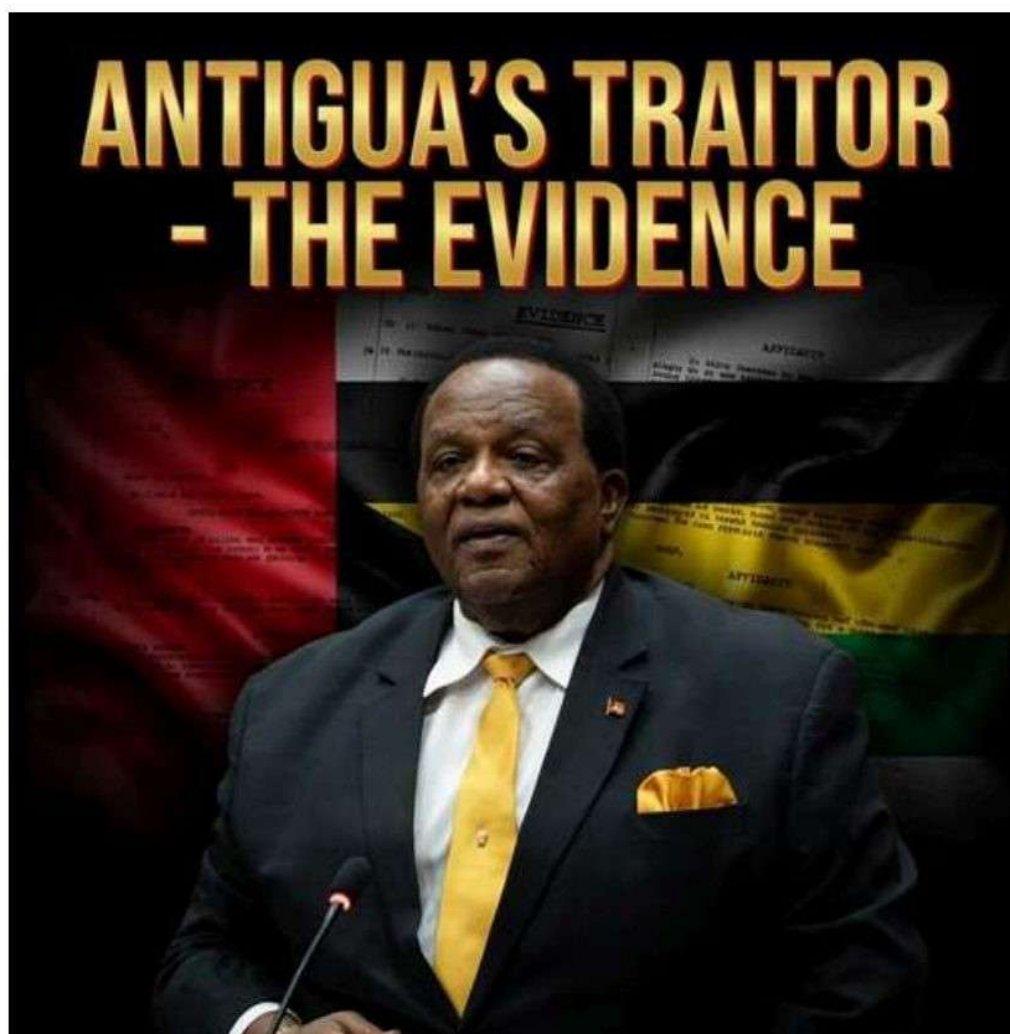


By Alki David

MAR 31, 2026

How can I help you?

Exhibit D, source page 1



Here it is...

The question posed to the court and to AG Steadroy Benjamin. Still waiting for an answer.

Case Number :ANUHCY2025/0149	
IN THE HIGH COURT OF JUSTICE	
ANTIGUA AND BARBUDA	
Claim No: [To be assigned by Registry]	
BETWEEN:	
ALKIVIADES DAVID	
<i>of SwissX Island, St. John's, Antigua & Barbuda</i>	
Claimant	
— AND —	

RIBBEAN SUPREME COURT	
H COURT OF JUSTICE	
49	
VIADES DAVID	
And	Claimant
1. DAVID BOIES	
2. GLORIA ALLRED	
3. DANI PERETZ	

How can I help you?

Exhibit D, source page 2

SWISSX LEGAL™

LEGAL INTELLIGENCE • ANTIGUA AND BARBUDA

1. DAVID BOIES, of Boies Schiller Flexner

2. GLORIA ALLRED, of Allred, Maroko & C

3. DANI PERETZ, of Genova, Switzerland &

4. SHARI REDSTONE, of Paramount Globi

5. DAPHNE BARAK, of Beverly Hills, Calif

6. MICHAEL AVENATTI, formerly of Eagan

7. TOM GIRARDI, incarcerated at Federal

USA

8. BLACK CUBE LTD, on Israeli-owned pri

and Tel Aviv, Israel

9. LIMEWIRE NFT HOLDINGS, with assets

10. EDGAR BRONFMAN SR. (Deceased), w

11. JOHN BRANCA, of West Hollywood and

12. JOHN MCCLAIN, music executive, of Lo

13. THE EXECUTIVE MEMBERS OF THE UN

Antigua & Barbuda

14. And DOES 1-100

Defendants

STATEMENT OF CLAIM

1. Parties

The Claimant, Atkiviades David ("Claimant"), is
rights advocate, and founder of SwissX, operati
biofuel enterprise in St. John's, Antigua & Barba

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

DRAFT ORDER

LE JUSTICE RENE WILLIAMS (IN

DAY October 2025

DAY 2025

on 17th April 2025

concerned as to whether:

the circumstances where none of

de within the jurisdiction and most

appear to relate to acts occurring

This side-by-side comparison shows why the dispute matters. The **UPP** and **six executive members** were removed from the contested version of the document, not accidentally, but in a way that directly affected the **jurisdiction of the claim**. Remove them, and the lawsuit risks being shut down on jurisdictional grounds, forcing the claimant to start again from scratch — a reset that would likely have killed the case altogether.

For context, I raised this issue directly at the Attorney General's Chambers.

 How can I help you?

Exhibit D, source page 3



This is no longer a local dispute. The multi-jurisdictional consequences now extend into the United States, where Attorney General Mac Warner of the US Department of Justice – Civil Division – is aware of the escalating appellate record, including Prime Minister Gaston Browne's (and mine as well as I was duly named in the suit), recent Southern District of New York win against defamation arising from the Alpha Nero matter. That record does not stand in isolation; it connects directly into the broader Diddy Combs and Pellicano – David Boies network already exposed across multiple proceedings.

When I attended Antigua's AG Office / Benjamin – to seek clarification on the discrepancy, the response was immediate and hostile. I was ordered to leave, and the Assistant Commissioner of Antigua's Police was invoked as a form of personal enforcement. The Attorney General expressed clear outrage at being questioned on the matter at all.

That interaction did not resolve the issue. It reinforced it.

 How can I help you?

Exhibit D, source page 4

This tension did not arise in isolation. It has been building since the Attorney General entered the proceedings as amicus.

It is precisely because of that escalation — and the absence of any substantive explanation — that the matter has now been placed formally before law enforcement and on the record across multiple courts.

And here it is.

1 of 2

FILED
HIGH COURT
ANTIGUA AND BARBUDA

Case Number : ANUHCV2025/0149

IN THE HIGH COURT OF JUSTICE
EASTERN CARIBBEAN SUPREME COURT
ANTIGUA AND BARBUDA

Claim No.: ANUHCV2025/0149

BETWEEN
ALKIVIADES DAVID
Claimant

-and-

[DEFENDANTS AS ORIGINALLY NAMED]

NOTICE OF FACTUAL CLARIFICATION
(UPP EXECUTIVE DEFENDANTS, GEOGRAPHICAL NEXUS, AND JUDICIAL COMITY)

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A. ORIGINAL NAMING OF THE UPP EXECUTIVE DEFENDANTS

2. The Original Claim Form filed on 17 April 2025 named fourteen (14) Defendants.

Submitted Date: 03/02/2026 09:50

Filed Date: 03/02/2026 09:51

Fees Paid: 12.00

[Notice_Factual_Clarification_UPP_Geography_Comity_FINAL_SIGN](#) [Download](#)

Not a rumor. Not a whisper campaign.

A formal complaint has been submitted to the Criminal Investigations Department and referred to the Commissioner of Police.

Here is that one too.

🗨️ How can I help you?

Exhibit D, source page 5

[Released for public scrutiny: Confidential report – Jeffers](#) [Download](#)



At the governmental level, contact has also been made between the Dallas Police Department and the Royal Police Force of Antigua and Barbuda. That communication underscores that these issues are not being treated as isolated local complaints, but as part of a wider law-enforcement picture with cross-border implications. The filings and supporting materials provided to Commissioner Jeffers therefore sit within a broader matrix of simultaneous proceedings, investigations, and reported criminal events spanning multiple jurisdictions.

At its heart is one clear, serious question:

Was a document in a live High Court proceeding altered?

The Carbon Act is the prize. It is the gateway to energy independence, sovereign carbon value, and a new economic order for Antigua and Barbuda. That is why the old-world fossil-fuel bullies want it buried, discredited, and strangled before it can stand. This warfare. It is an attempt to crush a nation's right to power itself. [How can I help you?](#)

Exhibit D, source page 6

Case Number :ANUHCV2025/0149

FILED
HIGH COURT
ANTIGUA AND BARBUDA

EXHIBIT AG Submitted Date:14/10/2025 09:46

Antigua and Barbuda Carbon Compliance Market Act (2025) Filed Date:14/10/2025 09:48

Fees Paid:17.00

An Act to establish a legal framework for the generation, verification, registration, and trading of carbon credits within Antigua and Barbuda, and to align national carbon market mechanisms with the country's Nationally Determined Contributions (NDCs) under the Paris Agreement.

1. Short Title

This Act may be cited as the Carbon Compliance Market Act, 2025.

2. Purpose

The purpose of this Act is to establish Antigua and Barbuda's national compliance carbon market, regulate carbon credit issuance and trade under Article 6 of the Paris Agreement, and promote investment in blue-carbon and green-carbon projects.

3. Definitions

Carbon Credit means a tradable certificate representing one metric ton of carbon dioxide reduced.

[AG-Carbon-Act-Filed-Exhibit-14th-October-2025 \(1\)](#) Download

A Carbon Union built around Antigua could unlock **up to \$8 billion a year** in new value by turning restoration, biofuel, biochar, carbon credits, and sovereign island production into protected national assets — giving Antigua a path to jobs, ownership, energy independence, and real economic freedom for its people.

THE ISSUE IS SIMPLE — AND THAT'S WHY IT MATTERS

This is not about global conspiracies or personal disputes.

It is about something every Antiguan understands at a fundamental level:

If the court record cannot be trusted, nothing else can be.

The complaint arises directly from proceedings in **Claim No. ANUHCV2025/0149**, part of broader litigation involving jurisdictions in Antigua, the United States, and the United Kingdom.

A specific document now under scrutiny is alleged to differ materially from the version originally filed with the court.

That is not a minor technicality.

It marks the line between:

- justice and manipulation
- proper process and abuse of process

FINAL WORD

This is not noise.

It is a recorded escalation: across courts, across jurisdictions, and now within law enforcement.

Handled correctly, it strengthens Antigua's institutions. Ignored or sidelined, it weakens them.

In a small nation where trust in the justice system is everything, that distinction matters more than ever.

The file now rests with the Commissioner of Police.

The next step is not commentary. **It is verification.**

 How can I help you?

Exhibit D, source page 7

The official record will do one of two things: confirm the integrity of the system — or expose a failure that cannot be ignored.

Antigua and Barbuda deserves a justice system its people can trust without reservation.



« [Miami Attorney Ariel Mitchell Suspended After Pleading Guilty to Misconduct in Sean 'Diddy' Combs Related Case](#)

[EXCLUSIVE: THE EPSTEIN CLASS DIES ON THE RECORD — History Will Remember This Week](#) »

By [Alki David](#)



Alki David — Publisher, Media Architect, SIN Network Creator - live, direct-to-public communication, media infrastructure, accountability journalism, and independent distribution. Born in Lagos, Nigeria; educated in the United Kingdom and Switzerland; attended the Royal College of Art. Early internet broadcaster — participated in real-time public coverage during the 1997 Mars landing era using experimental online transmission from Beverly Hills. Founder of FilmOn, one of the earliest global internet television networks offering live and on-demand broadcasting outside legacy gatekeepers. Publisher of SHOCKYA — reporting since 2010 on systemic corruption inside the entertainment business and its expansion into law, finance, and regulation. Creator of the SIN Network (ShockYA Integrated Network), a federated media and civic-information infrastructure spanning investigative journalism, live TV, documentary, and court-record reporting. Lived and worked for over 40 years inside global media hubs including Malibu, Beverly Hills, London, Hong Kong and Gstaad. Early encounter with Julian Assange during the first Hologram USA operations proved a formative turning point — exposing the realities of lawfare, information suppression, and concentrated media power. Principal complainant and driving force behind what court filings describe as the largest consolidated media–legal accountability action on record, now before the Eastern Caribbean Supreme Court. Relocated to Antigua & Barbuda and entered sustained legal, civic, and informational confrontation over media power, safeguarding, and accountability at Commonwealth scale.

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How can I help you?

Exhibit D, source page 8



EXHIBIT I — ACRO CRIMINAL RECORDS OFFICE CERTIFICATE

Summary of Exhibit

This exhibit consists of the official ACRO Criminal Records Office Police Certificate issued in the United Kingdom concerning Alkiviades Andrew David.

The certificate expressly records the result as:

“NO TRACE”

The accompanying ACRO explanatory letter states that “NO TRACE” means:

“You have NO convictions, cautions, final warnings or reprimands recorded on PNC.”

The certificate further contains no indication of pending prosecutions or active criminal investigations recorded on the disclosed UK police databases.

This exhibit is submitted to correct prejudicial implication, media narrative, or reputational suggestion that the Applicant is criminally convicted, criminally sanctioned, or the subject of disclosed UK criminal enforcement findings.

ACRO Reference: PC/24/174252

Date Printed: 10 December 2024

Page 1 of 1

URN: PC/24/174252

POLICE CERTIFICATE (UK)

For visa and immigration purposes

This personal data is provided to you by ACRO Criminal Records Office for the purpose of an immigration, consular, visa or citizenship related application made to a foreign government. Keep the data secure and protect it against loss or unauthorised access.



Date of creation: 09/12/2024

Applicant details

Surname:	DAVID	Address:	4 Wilton Place London Greater London SW1X 8RH
Forename(s):	Alkiviades Andrew		
Other name(s):			
Date of birth:	23/05/1968		

Travel document details

Surname:	DAVID	Document number:	142800737
Forename(s):	Alkiviades Andrew	Nationality/Citizenship:	British Citizen
Date of birth:	23/05/1968	Place of birth:	Lagos
		Sex:	Male

Summary of convictions and reprimands/warnings/cautions/impending prosecutions/under investigations held on UK police databases and disclosed in accordance with the ACRO stepping down model

NO TRACE

Checked by: (ACRO Officer) *U*

Date printed: 10/12/2024

ACRO Criminal Records Office
police.certificates@acro.police.uk | acro.police.uk

NPCC
National Police Chiefs' Council
ACRO Criminal Records Office

Page 1 of 1

ACRO

Criminal Records Office

Mr Alkiviades Andrew DAVID
4 Wilton Place
London
Greater London
SW1X 8RH

Date: 10 December 2024
Ref: PC/24/174252

Dear Mr DAVID,

Please find enclosed your Police Certificate(s).

We have made enquiries on UK police databases based on the information that you provided. The certificate(s) will state one of the following:

RESULT	DEFINITION
NO TRACE	You have NO convictions, cautions, final warnings or reprimands recorded on PNC.
SUMMARY OF CONVICTIONS	You have a criminal record and all your convictions are shown on your certificate.
NO LIVE TRACE	You have a criminal record, however this information does not appear on the certificate because it has been stepped down.*
FURTHER INFORMATION STEPPED DOWN	You have a criminal record, however only relevant criminal record information appears on the certificate because some convictions have been stepped down.*

*Further details about the 'stepping down' of criminal record information from the certificate can be found on the ACRO website.

If your certificate contains an impending prosecution or 'under investigation', you are currently being investigated in relation to a criminal offence for which no outcome has yet been recorded.

ACRO accepts no liability should the information contained therein be misused by any party, or the use of the certificate(s), or information contained therein, results in any adverse implications for the person named on the certificate(s).

If you have any questions, further advice is available on our website or from our Customer Services team via the contact details below.

Yours sincerely,

[Signature]

D/Supt 24433
Head of ACRO Criminal Records Office
ACRO, PO Box 481, Fareham, Hampshire, PO14 9F5
customer.services@acro.police.uk
+44 (0)2380 451 477 | @ACRO_police_cst | acro.police.uk

NPCC
National Police Chiefs' Council
ACRO Criminal Records Office

Purpose of Exhibit

This exhibit is relied upon for preservation, evidentiary fairness, disability accommodation context, and record integrity purposes only.

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Claim No. KB-2025-001991

Before Senior Master Cook

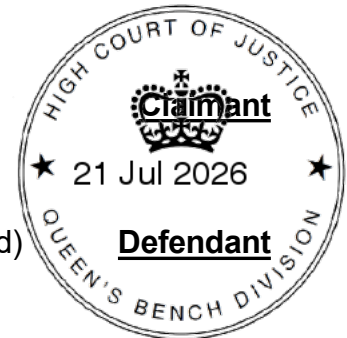
Dated 21 July 2026

BETWEEN

1. Mahim Khan

- and -

1. Alkiviades David (also Known As Alki David)



KB-2025-001991

ORDER

THIS ORDER IS MADE BY THE COURT OF ITS OWN MOTION

UPON the court having received a psychiatric report prepared by Dr Flavian Costin Naclad and dated 18 July 2026 in accordance with paragraph 3 of its order dated 14 May 2026

AND UPON the court being satisfied that the Defendant has the capacity to litigate in accordance with the provisions of the Mental Capacity Act 2026

AND UPON the court having regard to Dr Naclad's functional assessment of the Defendant set out at paragraphs 5.33 to 5.59 of his report and his observations on potential reasonable adjustments set out at paragraph 5.69 of his report.

IT IS ORDERED that

1. The hearing of the Claimant's application for a Third Party Debt Order be listed together with the Claimant's application for a Charging Order for determination on the papers without a hearing in accordance with CPR 23.8 (1) (c).
2. The Claimant shall by 4pm on 7 August 2026 file and serve a single paginated bundle containing its evidence in support of the applications and a short skeleton argument limited to 5 A4 pages setting out its written legal submissions in support of the Applications.
3. The Defendant shall by 4pm on 4 September 2026 file a single paginated bundle containing any evidence in reply to the Claimant's evidence and a short skeleton argument limited to 5 A4 pages setting out his written legal submissions in opposition to the Applications.

4. The Claimant shall by 4pm on 18 September 2026 file any evidence and/or submissions in response.
5. Any party may apply on notice to set aside or vary this order within 7 days of service.

Reasons

1. **The Court does not think an oral hearing would be appropriate because the Defendant has demonstrated an inability to conduct himself reasonably and responsibly which is confirmed and supported by his own psychiatric evidence.**
2. **Disposing of the matter on the papers will permit the Defendant to focus on the issues in a less pressurised format and to formulate his evidence and submissions in a less pressurised environment.**
3. **In the circumstances there is no advantage in an oral hearing and the interests of justice are best served by a paper determination**

SERVICE OF THE ORDER

The Court has sent sealed copies of this order to:

Howard Kennedy LLP, No. 1 London Bridge, London SE1 9BG



HM Courts &
Tribunals Service

Howard Kennedy LLP
No. 1 London Bridge
London SE1 9BG

Date: 21-07-2026

Dear Madam/Sir,

RE: KB-2025-001991 Khan v David (also known as Alki David)

Please find the enclosed documents.

Yours faithfully,

Jonathan Eves

**Masters' Listing
King's Bench Division**

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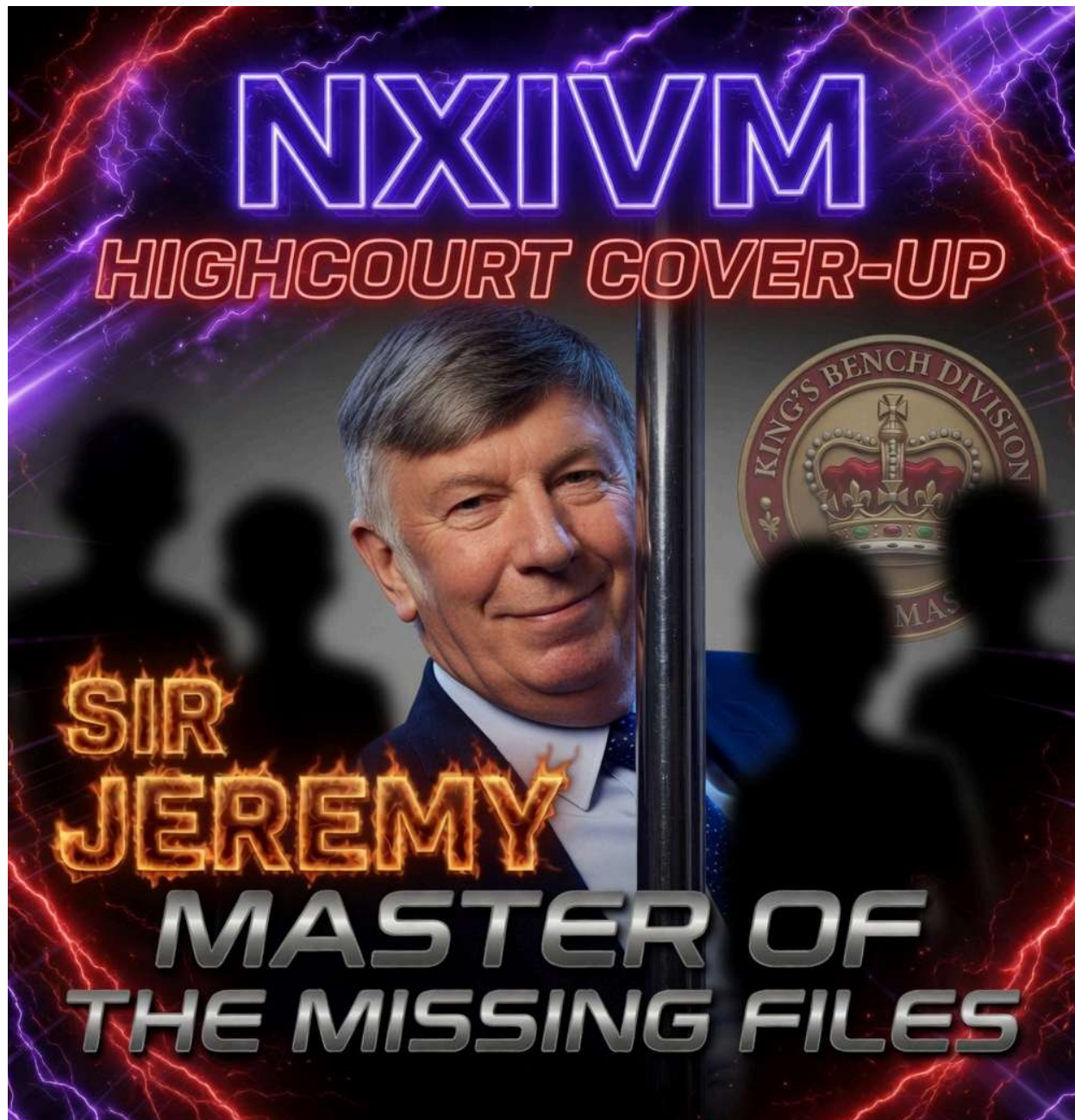
How London's High Court Let the NXIVM– Camila Child-Porn Nightmare “Explode” On Senior Master Cook’s Curious Blind Spot



By Alki David

🕒 APR 28, 2026

High Court Judge Senior Master Sir Jeremy Cook Embroiled In NXIVM Coverup



LONDON / ANTIGUA, 28 April 2026 — While Senior Master Jeremy David Cook busies himself with procedural housekeeping and CE-File mysteries in claim **KB-2025-001991**, the real scandal is what he has apparently allowed to fester unchecked: the documented overlap between elite networks, NXIVM-style kompromat operations, and the horrific exploitation symbolised by “Camila” — the Mexican girl who was just 15 when NXIVM leader Keith Raniere began his documented abuse.



ANTIGUA, April 2026 — Hollywood star **Robert De Niro** and billionaire **James Packer** have been named in an official criminal intelligence dossier submitted to Antigua's CID, linking their **Nobu Barbuda** project to the [murder investigation](#) of former MP **Asot Michael**.

The evidence was formally placed on the UK High Court record (KB-2025-001991) by litigant in person Alki David in Exhibit AF, including child safety alerts tied to the Nobu network.

Asot Michael was found stabbed to death in November 2024. The investigation remains active.

In Exhibit AF, formally filed in compliance with Cook's own order and CPR 32.8, Alki David placed on the official court record urgent evidence linking Nobu Barbuda's luxury hospitality scene (and its associated players) to the expanding murder investigation of Asot Michael in Antigua — complete with child safety alerts and references to NXIVM-style blackmail and trafficking systems. Yet instead of decisive judicial action to protect the record and the vulnerable, the litigant in person reports invisible files, missing portals, and procedural paralysis.

IN THE HIGH COURT OF JUSTICE - KING'S BENCH DIVISION

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
Claim No. KB-2025-001991

BETWEEN
MAHIM KHAN
Claimant
- and -
ALKIVIADES DAVID
(also known as ALKI DAVID)
Defendant

EXHIBIT AF
DEFENDANT'S SUPPLEMENTAL SUMMARY OF EVIDENCE
AND URGENT CHILD SAFETY ALERT
Filed pursuant to CPR 32.8 - 8 May 2026

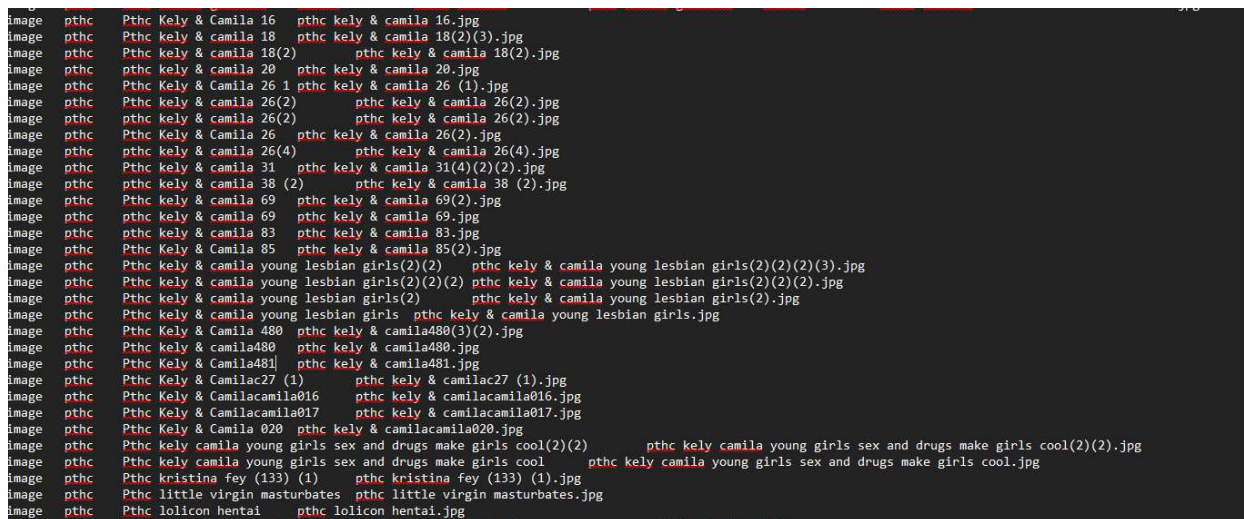
I, Alkiviades David, make this exhibit in support of my opposition to the Claimant's applications for a Third Party Debt Order and Charging Order.

[Exhibit_AF_2026-04-23](#) Download

One is left to wonder: how does a Senior Master in the King's Bench Division allow this particular powder keg to keep ticking?

The Camila Precedent — Ignored at Everyone's Peril

For those who followed the NXIVM trials, "Camila" is not an abstract footnote. She met Ranieri at 13. Sex began at 15. Nude photographs were taken while she was still a child. The evidence that eventually surfaced — texts demanding absolute obedience, recruitment of more underage victims, and the preserved child pornography — helped dismantle one of the most depraved cults in modern history.

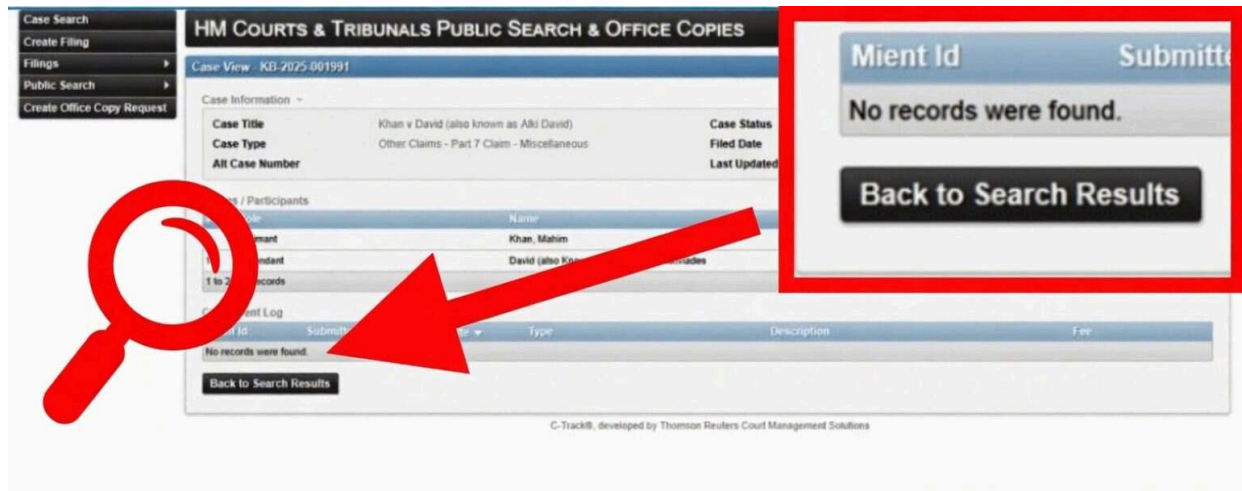


David's filing doesn't allege Cook is personally running a sex cult. It does, however, scream that the court, under his stewardship, has allowed high-stakes evidence touching on exactly these themes — elite kompromat, child-safety red flags, and cross-jurisdictional networks — to sit in a semi-invisible limbo while enforcement proceedings against a disabled litigant in person roll forward.

While Cook's registry apparently struggles to make case files visible to the very party before him, the NXIVM echoes in the Nobu/Barbuda dossier were permitted to "explode" into the public domain without the court appearing to grasp the urgency. Child safety alerts filed in a High Court claim should not require a disabled litigant to chase audit trails and beg for basic visibility.

The Optics Are Brutal

- A Senior Master **already on notice** of a litigant's Traumatic Brain Injury and reasonable-adjustment needs.
- Evidence touching on modern slavery, child sexual exploitation, and murder-adjacent networks formally before the court.
- Yet the visible case file reads "No records were found."



Master Cook may wish to hide behind "this is just case management," but the public sees something closer to judicial sleepwalking while serious safeguarding issues smoulder. The same court system that lectures the world on transparency and human rights is reduced to asking a litigant in Antigua whether the internal file even exists.

This is not robust case management. This is the curious case of a Senior Master presiding over an evidentiary slow-motion train wreck involving precisely the kind of predatory networks the justice system claims to abhor.

David's latest letter puts it plainly: a disabled litigant in person must be able to **see** the record of his own case before procedural swords fall. Especially when that record now includes filed material on NXIVM-adjacent operations and the living nightmare endured by victims like Camila.

Senior Master Cook has a choice: restore full, transparent access and confront the evidence on the file — or let the perception harden that the King's Bench Division would rather disappear inconvenient files than deal with inconvenient truths.

The public, the press, and no doubt the Antigua authorities investigating the Asot Michael murder, are watching.

Article based on court filings in KB-2025-001991, Exhibit AF, and publicly reported NXIVM proceedings.

[Edit](#)



<< THE TROJAN HORSE IN THE KING'S BENCH London High Court Senior Master Jeremy David Cook in Child Pornography Crosshairs In Murder Case Of Asot Michael – King's Bench Division >>

By Alki David



Alki David — Publisher, Media Architect, SIN Network Creator - live, direct-to-public communication, media infrastructure, accountability journalism, and independent distribution. Born in Lagos, Nigeria; educated in the United Kingdom and Switzerland; attended the Royal College of Art. Early internet broadcaster — participated in real-time public coverage during the 1997 Mars landing era using experimental online transmission from Beverly Hills. Founder of FilmOn, one of the earliest global internet television networks offering live and on-demand broadcasting outside legacy gatekeepers. Publisher of SHOCKYA — reporting since 2010 on systemic corruption inside the entertainment business and its expansion into law, finance, and regulation. Creator of the SIN Network (ShockYA Integrated Network), a federated media and civic-information infrastructure spanning investigative journalism, live TV, documentary, and court-record reporting. Lived and worked for over 40 years inside global media hubs including Malibu, Beverly Hills, London, Hong Kong and Gstaad. Early encounter with Julian Assange during the first Hologram USA operations proved a formative turning point — exposing the realities of lawfare, information suppression, and concentrated media power. Principal complainant and driving force behind what court filings describe as the largest consolidated media–legal accountability action on record, now before the Eastern Caribbean Supreme Court. Relocated to Antigua & Barbuda and entered sustained legal, civic, and informational confrontation over media power, safeguarding, and accountability at Commonwealth scale.

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