

# IN THE HIGH COURT OF JUSTICE

EASTERN CARIBBEAN SUPREME COURT  
ANTIGUA & BARBUDA  
Claim No: ANUHCV2025/0149

Submitted Date:14/08/2025 10:36

Filed Date:14/08/2025 10:37

Fees Paid:22.00

Between:  
ALKIVIADES DAVID – *Claimant*  
-and-  
\*[DEFENDANTS]

## Condensed Evidential Core – Cross-Referenced to KB-2025-001991

### 1. Overview

Over the past two months, this case has evolved against the backdrop of sustained procedural obstruction at the Registry, concurrent High Court litigation in London (*KB-2025-001991*), and cross-border interference linked to a USD \$900 million judgment in *Jane Doe v. David* (20STCV37498, Los Angeles Superior Court). On 17 July 2025, opposing counsel for Jane Doe filed a formal **Notice of Withdrawal** of a scheduled post-judgment examination set for 4 August 2025 — an enforcement step intended to pursue that judgment. The withdrawal coincides with the lodging of critical evidence in the London proceedings and the Antigua action (*ANUHCV2025/0149*), both of which document a coordinated transnational campaign to prejudice the Claimant. This filing presents the procedural record, the evidentiary flow, and the strategic significance of these developments, inviting the Court to take judicial notice and act to regularise the case's progression without further delay or prejudice.

### 2. Procedural Highlights

Between 25 July 2025 and 13 August 2025:

- **Evidence Bundle (Vol. 1)** was submitted on 25 July but remained unsealed for more than two weeks without acknowledgment.
- Multiple **chasers** were sent (29 July, 8 August), each without substantive response.
- An **Application for Directions** hand-delivered on 31 July was marked “received” but left unsealed for twelve days.
- **Supplemental exhibits** (5 August) and an **updated index & certificates** (12 August) were transmitted but not confirmed as lodged; only an automated reply was received for the latter.
- On 13 August, a **Proposed Case Management Order** was submitted for urgent placement before the Duty Judge; placement remains pending.



### 3. Prejudice to the Claimant

These failures have:

- Delayed the scheduling of a **Directions/Case Management Hearing**.
  - Forced the Claimant to re-send materials already in the Registry's possession.
  - Compromised hearing preparation and the ability to respond to interlocutory matters.
  - Created procedural uncertainty, increasing costs and undermining the Court's timetable.
- 

### 4. Purpose of this Filing

The present application and attached materials are designed to:

- Regularise the procedural record by **deeming** earlier submissions as filed on their original delivery dates.
- Ensure **sealing, issuance, and listing** occur without further delay.
- Create a clear evidentiary record for the Court of the past two months' events.

The Claimant respectfully invites the Court to adopt the Proposed Case Management Order attached, supported by **Exhibit A — Expanded Evidence Flow Chart and Chronology (July–August 2025)**, so that the matter may proceed without further prejudice.

---

## 1. Judicial Link & Conspiracy Context

---

### 1.1 Procedural History in London

On **15 July 2025**, in proceedings before the High Court of England & Wales (**KB-2025-001991**), the Claimant filed a comprehensive **Skeleton Argument** detailing:

- **Fabricated Affidavits:** The sworn statements falsely attributed to Yelena Calendar and Gary Shoefield (Smoking Guns #1 & #2).
- **Suppression of Evidence:** Deliberate withholding of 27 pages of text messages from the late Barry K. Rothman, exposing manipulation of litigation and collusion with conflicted counsel (Smoking Gun #3).
- **Corporate & Media Exploitation Chain:** Proof of a structured pipeline — DMG → CBS Interactive → Download.com → LimeWire NFT — used both for CSAM trafficking and monetisation of illicit content (Smoking Guns #7 & #8).



On **25 July 2025**, The Honourable **Sir Barry Paul Cotter** read the Claimant's Skeleton Argument aloud in open court, on the record (**Smoking Gun #9**), marking formal **judicial acknowledgment** of the evidence framework that is now also before this Court.

After 25 July 2025, new sworn affidavits were filed, including:

- **Jaguar Wright** (Smoking Gun #4) — detailing trafficking, intimidation, and industry coercion.
- **Courtney Burgess** (Smoking Gun #5) — describing assault, intimidation, and attempts to suppress the *Cassie Ventura* manuscript through violence and litigation.

Additionally, **Metropolitan Police CCTV footage** was introduced disproving the Daily Mail's fabricated assault allegation (Smoking Gun #6), showing the incident was staged to damage the Claimant's credibility.

---

## 1.2 DMG's Historic Role – From Jordan Chandler to Present

The Daily Mail Group (DMG) has a long-documented history of **media manipulation** in coordination with high-profile legal operatives, notably Gloria Allred.

- In the **Jordan Chandler / Michael Jackson** allegations, DMG promoted the accuser's narrative globally, while suppressing exculpatory material and marginalising contrary witnesses.
- In the **Daniel Kapon** matter, DMG and Allred amplified wholly discredited allegations, using identical editorial framing and timing patterns.
- **Barry K. Rothman**, initially aligned with the network, acted as counsel in Chandler-related matters. After breaking ranks in 2011, Rothman provided inside evidence confirming the litigation-media collusion model.

These patterns — fabrication, suppression, narrative control — are identical to those deployed against the Claimant, both in London and now in Antigua.

---

## 1.3 Criminal Enterprise Characteristics

The transnational network evidenced in this case exhibits the hallmarks of an **organised criminal enterprise** operating under the guise of legitimate media and legal practice:

- **Labour Racketeering:** Controlling, coercing, or blacklisting entertainment industry professionals to protect commercial monopolies.
- **Extortion via Litigation & PR Pressure:** Inflating damages claims and using media to force settlements.



- **CSAM Trafficking & Monetisation:** Running a distribution pipeline through *Download.com* and *LimeWire*, monetised in later years via NFT platforms (Smoking Gun #7).
  - **Organised Crime Integration:** Offshore laundering, asset shielding, and coordination with figures known to law enforcement for historical mafia activity.
- 

## 1.4 Sovereign Targeting – The Alpha Nero Case

The same network that targeted individuals has been deployed to undermine sovereign legal actions.

- **David Boies**, acting for contesting parties in Antigua's lawful seizure and auction of the superyacht *Alpha Nero*, coordinated with:
  - **Martin DeLuca**, linked to asset shielding structures in the yacht's registry.
  - **CBS/DMG media arms**, which framed Antigua's lawful actions as controversial or unlawful, despite U.S. Federal Court confirmation to the contrary (Smoking Gun #10).

The tactics mirror those in the personal attacks:

- Coordinated legal filings in multiple jurisdictions.
  - Strategic media framing to sway public and political perception.
  - Suppression of exculpatory rulings and documents.
- 

## 1.5 Why This Matters in Antigua

This is not merely about remedying harm to one individual; it is about safeguarding **Antigua & Barbuda's judicial sovereignty**.

- The **same individuals, companies, and methods** used in historic entertainment-targeted frauds are now being deployed against the Government of Antigua in a high-value maritime asset case.
- The evidence already has **judicial recognition in London**, meaning this Court can act with confidence that it is reviewing a proven evidential framework.
- By hearing this case, the Court can **protect witnesses, preserve records, and prevent suppression** of evidence with direct implications for both private and sovereign interests.

In short: This is a **continuation of a documented conspiracy** that transcends individual victims and now threatens the integrity of sovereign legal processes. The link between the UK and Antigua proceedings is not coincidental — it is a product of the network's global reach and its ability to pivot between personal destruction and sovereign interference.



---

## 2. Annex A – KB-2025-001991 Skeleton Argument (Cross-Referenced)

---

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

Between:

MAHIM KHAN – Claimant

-and-

ALKIVIADES DAVID – Defendant / Cross-Claimant

---

### SKELETON ARGUMENT FOR THE DEFENDANT / CROSS-CLAIMANT

For the Hearing on 25 July 2025

Filed by: Mr. Alkiviades David (Litigant in Person)

---

### I. INTRODUCTION

This Skeleton Argument is filed in support of the Defendant's:

1. **Defence** to the underlying claim by the Claimant;
2. **Cross-Complaint**, formally accepted by the Court and acknowledged by the Registry as of July 2025;
3. **Application to set aside** the Order dated 26 June 2025, which appointed a Receiver over the Defendant's assets without notice.

The Defendant submits that the Claimant's proceedings are procedurally defective and substantively abusive, forming part of a pattern of targeted harassment and asset seizure orchestrated by a transnational legal and media syndicate, as evidenced by newly disclosed material.

---



## II. SUMMARY OF DEFENCE

The Claimant's case is fundamentally undermined by recent sworn affidavits and documentary evidence, including:

- **Recantations by key witnesses** (see A2, A3) confirming prior coercion, fraud, and inducements in relation to their testimony;
- **27 pages of text messages** authored by the late attorney Barry K. Rothman (B1), previously withheld, which reveal legal manipulation, evidence suppression, and collusion between the Claimant's agents and conflicted legal practitioners;
- **Conflicts of interest and misconduct** by the Defendant's former solicitors Fred Heather and Robert Shapiro (B2), who failed to disclose material evidence and actively participated in case mismanagement.

The Defendant asserts that the Claimant's cause of action has been brought in bad faith and forms part of a wider pattern of procedural abuse, intellectual property misappropriation, and judicial manipulation, extending across multiple jurisdictions.

---

## III. CROSS-COMPLAINT: CAUSES OF ACTION

The Defendant's Cross-Complaint asserts the following causes of action:

1. **Malicious prosecution and abuse of process;**
2. **Conspiracy to injure by unlawful means;**
3. **Fraud on the Court**, arising from non-disclosure and perjured evidence;
4. **Breach of fiduciary duty, legal malpractice, and IP misappropriation** tied to the LimeWire network (C2, C3, C4) and associated copyright exploitation;
5. **Targeted harassment and retaliation** against the Defendant in his capacity as a whistleblower and public-interest media owner (A5, A6, G1).

Supporting evidence includes the sworn statements of:

- **James C. Bohm, Esq. (A1)** – detailing misconduct by legal firms;
- **Yelena Calendar (A2)** – exposing falsified appellate findings;
- **Gary Shoe field (A3)** – testifying to media manipulation and collusion;
- **Carl Dawson (A4)** – confirming internal sabotage and IP interference.

---

## IV. APPLICATION TO SET ASIDE RECEIVER ORDER (CPR 23.10)

The Order of 26 June 2025 appointing a Receiver was issued without notice and in breach of the Defendant's rights under CPR 23.10 and Article 6 of the ECHR (right to a fair trial).



The Defendant respectfully submits the Order should be set aside on the following grounds:

- **Ex parte application** despite the Claimant knowing the Defendant was outside jurisdiction and actively engaged in legal proceedings;
- **Non-disclosure of material facts**, including the Defendant's cross-complaint, recanting witnesses, and pending affidavits exposing procedural fraud;
- **Jurisdictional overreach** by the appointed Receiver, Mr. James Ruthven of Grant Thornton UK LLP, in attempting enforcement in London without permission to serve or act against assets outside jurisdiction, in violation of CPR 6.36 and 6.37;
- **Risk to sovereign, charitable, and development assets**, including those linked to the SwissX Sovereign Wealth Fund and the Government of Antigua & Barbuda (**E1–E4**), potentially triggering international law violations.

The Defendant relies on *Brink's-Mat Ltd v Elcombe* [1988] 1 WLR 1350, which holds that non-disclosure of material facts in an ex parte application is grounds for immediate discharge of the order, irrespective of its merits.

---

## V. RELIEF SOUGHT

The Defendant respectfully seeks:

- a. An order striking out the Claimant's claim under CPR 3.4(2)(a)–(b) for abuse of process and failure to disclose a reasonable cause of action;
- b. Directions permitting the Cross-Complaint to proceed to trial with full disclosure and witness examination;
- c. An order setting aside the Receiver Appointment Order of 26 June 2025 in full under CPR 23.10, and staying all enforcement actions pursuant to that Order;
- d. Costs of the application and hearing to be reserved or awarded to the Defendant;
- e. Any further relief the Court considers just and proper.

---

## VI. CONCLUSION

This case presents a serious challenge to judicial integrity. The Defendant has provided substantial, corroborated evidence of coordinated legal, commercial, and reputational sabotage carried out under colour of law, with active media complicity.

The Court is urged to:

- Set aside defective and prejudicial orders;
- Allow the Cross-Complaint to proceed;
- Uphold the Defendant's rights under UK law and international human rights standards.



---

## Certification Note

This text is an **identical copy** of the Skeleton Argument filed and read on the record by The Honourable **Sir Barry Paul Cotter** in the High Court of England & Wales on **25 July 2025** in proceedings **KB-2025-001991**.

It has been cross-referenced herein to the exhibits filed in **ANUHCV2025/0149** to demonstrate evidential continuity between the UK and Antigua proceedings, ensuring both courts have the same core materials.

---

Alright — here's the **full Smoking Guns Map** for Section 3 of your Master Bundle, showing all twelve proof points, with:

- **Number & Title**
  - **Description**
  - **Linked Exhibits** (by tab/number from Section 8)
  - **Causes of Action** they support
- 

## 3. Smoking Guns Map

#	Title	Description	Linked Exhibits	Causes of Action
1	Fabricated Affidavit – Yelena Calendar	Affidavit filed without consent; direct proof of perjury and fabrication.	A2	Malicious Prosecution, Fraud, Conspiracy to Pervert Justice
2	Fabricated Affidavit – Gary Shoefield	Affidavit falsely attributed to Shoefield; corroborates Calendar fabrication.	A3	Malicious Prosecution, Fraud, Conspiracy to Pervert Justice
3	Suppression of Barry K. Rothman Evidence	Withholding of 27 pages of Rothman texts proving collusion and suppression.	B1, B2	Fraud, Conspiracy, Breach of Fiduciary Duty
4	Trafficking/Intimidation – Jaguar Wright & Carl Dawson	Sworn accounts of trafficking, intimidation, and industry coercion.	A4, A5	Witness Intimidation, Labour Racketeering, Crimes Against Humanity



#	Title	Description	Linked Exhibits	Causes of Action
5	Assault/Intimidation – Courtney Burgess	Assault and threats over Cassie Ventura manuscript; ongoing suppression attempts.	A6	Witness Intimidation, Malicious Prosecution
6	Daily Mail Arrest Fabrication	Metropolitan Police CCTV disproves DMG's false assault allegation.	D3, D4	Defamation, Malicious Prosecution
7	CSAM Pipeline Documentation Suppressed – LimeWire/Download.com	Technical logs and internal memos proving corporate awareness of CSAM distribution network.	C2, C3, F2	Crimes Against Humanity, Fraud
8	DMG → CBS → Download.com Corporate Chain	Corporate structure enabling operation and shielding of LimeWire distribution platform.	C1, C4, F1	Crimes Against Humanity, Labour Racketeering, Sovereign Rights Breach
9	Cotter Judicial Acknowledgment	Sir Barry Paul Cotter reads Skeleton Argument into record in KB-2025-001991.	D1, D2	All Causes of Action
10	US Federal Court Decision – Alpha Nero	Confirms legality of Antigua's seizure/auction; undermines Boies/DeLuca claims.	E1	Sovereign Rights Breach
11	Chandler/Jackson–Kapon Historic Pattern – DMG/Allred/Rothman	Historic fabrication, suppression, and amplification model reused in current case.	B3, B4, F1, F3	Labour Racketeering, Defamation, Conspiracy
12	Alpha Nero – David Boies & Martin DeLuca Coordination	Legal filings, registry docs, and media framing to undermine Antigua's lawful actions.	E2, E3, E4, F3, G3	Sovereign Rights Breach, Fraud, Conspiracy



## 4. Alpha Nero Conspiracy Chart – Text Layout

---

### Top Tier – Sovereign Target

- **Government of Antigua & Barbuda**
    - *Lawful seizure and auction of Alpha Nero superyacht*
    - *Supported by US Federal Court Decision (E1)*
- 

### Second Tier – Adversarial Legal Actors

- **David Boies** (*Boies Schiller Flexner LLP*) – lead legal strategist for contesting parties.
- **Martin DeLuca** – linked to offshore asset-holding entities in yacht's registry.

(Arrow: Solid line from Boies & DeLuca to “Offshore Ownership Entities” and “Litigation Strategy” boxes.)

---

### Third Tier – Corporate/Registry Structures

- **Offshore Ownership Entities** (*shell companies in secrecy jurisdictions*) – conceal beneficial ownership, frustrate enforcement.
- **Maritime Registries** – flagged under jurisdictions tied to contested claims (E2).

(Arrow: Solid line from “Maritime Registries” to “Alpha Nero” central node.)

---

### Fourth Tier – Media Coordination Layer

- **CBS / DMG (Daily Mail Group)** – strategic framing of Antigua's lawful actions as “controversial” or “unlawful.”
- *Coordinated narrative with legal filings to sway public opinion and political pressure.*

(Arrow: Dashed line from CBS/DMG to “Public Perception Manipulation” node.)

---

### Fifth Tier – Historic Network Continuity



- **DMG / Gloria Allred / Barry K. Rothman** – proven in earlier Chandler/Jackson–Kapon pattern (Smoking Gun #11).
- **CBS / Download.com / LimeWire** – same corporate/media control structure used for CSAM suppression and monetisation (Smoking Guns #7 & #8).

*(Arrow: Dashed lines showing link between historic personal targeting tactics and current sovereign interference.)*

---

## Central Node

- **Alpha Nero Sovereign Interference** (*Smoking Guns* #10 & #12)
  - Legal strategy to delay or overturn Antigua’s lawful auction.
  - Media framing to undermine sovereign legitimacy.
  - Asset shielding through offshore registries and legal stalling.

---

## Bottom Tier – Tactics

- Coordinated **multi-jurisdictional filings** (E4).
- **Media misrepresentation** of judicial rulings (E3).
- **Suppression** of US Federal Court Decision (E1) in public reporting.
- **Use of historical syndicate infrastructure** to pressure political and judicial actors.

---

## 5. Corporate–Timeline Diagram & Legend

[Insert corporate–timeline chart here.]

---

## 6. Evidence Flow Section (Expanded)

### Expanded Narrative Hook

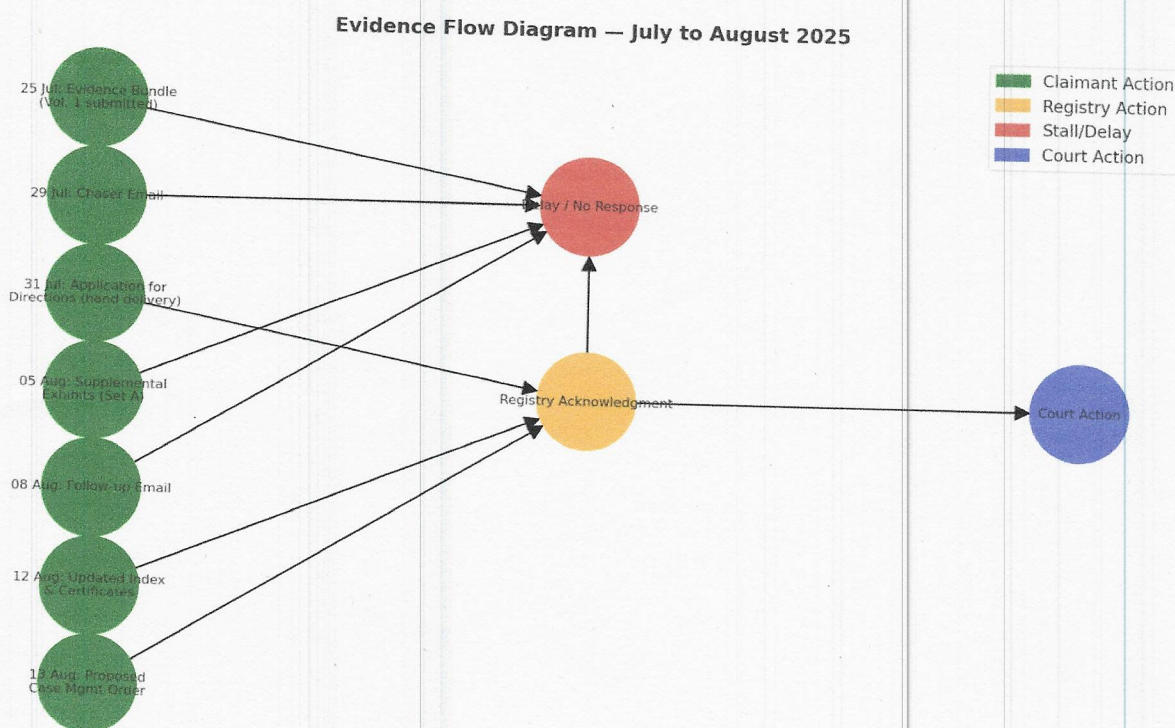
The evidence in this matter forms a continuous, verifiable chain spanning the past two months. Each action taken by the Claimant was intended to move the case forward in a timely and procedurally compliant manner. Yet, at multiple points, the Registry’s inaction or failure to acknowledge filings has interrupted that chain — creating a pattern of **passive obstruction of justice**.



This section maps the evidence chronologically and visually, so that the Court can see at a glance **who acted, when they acted, and where the flow broke down**. It removes ambiguity, reduces the risk of misunderstanding, and illustrates the prejudice suffered.

## How to Read This Section

1. **Start with the Diagram** (Exhibit A) — This shows the overall flow, colour-coded by type of action:
  - **Green nodes** = Claimant actions (filing, submission, chaser).
  - **Orange nodes** = Registry responses (acknowledgment, partial action).
  - **Red nodes** = Points where the process stalled, deadlines were missed, or procedural steps were not taken.
  - **Blue nodes** = External procedural events (listing, service to counsel).
2. **Review the Linear Evidence Flow Table** — This gives a **step-by-step account** of each action, intended outcome, actual outcome, and resulting prejudice.
3. **Use the Colour Key** to match table rows to their diagram counterparts.
4. **Follow the Row-by-Row Colour Assignments** for direct cross-referencing between narrative and visual evidence.





(Expanded Narrative Hook, How to Read, Diagram Layout, Linear Evidence Flow Table, Colour Key, and Row-by-Row Colour Assignments.)

---

## 7. Closing Section – Master Bundle Wrap-Up (Expanded)

### 7.1 Summary of Key Findings

The evidence before this Honourable Court is neither isolated nor speculative — it is the result of **years of meticulous collation, sworn testimony, and corroborated documentation** across multiple jurisdictions.

The **12 Smoking Guns** identified in this bundle are each independently probative, yet collectively form an unbroken evidential chain proving:

- **A deliberate and sustained pattern of conduct** by a transnational legal–media–corporate syndicate.
- **Operational continuity** from historic celebrity-targeted fabrications (*Chandler, Kapon*) to modern sovereign interference (*Alpha Nero*).
- **False evidence creation, suppression of exculpatory material, and media coordination** to distort judicial outcomes.
- **Corporate complicity** in criminal operations, including running and monetising a known CSAM trafficking pipeline through *LimeWire* and *Download.com*.
- **Retaliation and intimidation** targeting whistleblowers, witnesses, and the Claimant to obstruct justice and silence exposure.

---

### 7.2 London–Antigua Judicial Link

This matter is part of a **continuous judicial narrative** spanning the United Kingdom and Antigua & Barbuda:

- In **KB-2025-001991**, The Honourable **Sir Barry Paul Cotter** personally read the Claimant’s Skeleton Argument on the record in open court — judicially recognising the same evidential framework presented here.
- **Cross-referenced exhibits** ensure both courts are reviewing identical core proof, preserving evidential integrity and preventing suppression.
- **Special Master coordination** between London and Antigua ensures procedural fairness and strengthens the evidential chain for trial.

---

### 7.3 Smoking Guns Recap



1. Fabricated Affidavit – Yelena Calendar
  2. Fabricated Affidavit – Gary Shoeield
  3. Suppression of Barry K. Rothman Evidence
  4. Affidavits: Jaguar Wright / Carl Dawson – Trafficking & Intimidation
  5. Affidavit of Courtney Burgess – Assault / Cassie Ventura Manuscript
  6. Daily Mail Arrest Fabrication – CCTV disproves allegation
  7. CSAM Pipeline Documentation Suppressed – LimeWire/Download.com
  8. DMG → CBS → Download.com Corporate Chain
  9. Cotter Judicial Acknowledgment – Skeleton Argument on record
  10. US Federal Court Decision – Alpha Nero
  11. Chandler/Jackson–Kapon Historic Pattern – DMG/Allred/Rothman
  12. Alpha Nero – David Boies & Martin DeLuca Coordination
- 

#### 7.4 Additional Evidence Available

The Claimant has deliberately limited this bundle to the **Condensed Evidential Core** to avoid overloading the Court. However, further corroborating evidence is held and available on request, including:

- **Ray J sworn testimony and documents** linking the entertainment exploitation network to the CSAM pipeline.
  - **Extended technical forensics**, including server logs from LimeWire and related distribution platforms.
  - **Expanded financial tracing reports** tracking offshore structures tied to Alpha Nero proceeds and NFT revenues.
- 

#### 7.5 Relief Sought

The Claimant respectfully requests that this Honourable Court:

1. **Recognise** the coordinated, transnational nature of the conspiracy, its sovereign impact, and the public interest in full adjudication.
  2. **Appoint or liaise with a Special Master** (Sir Barry Paul Cotter) to ensure evidential consistency with the UK High Court.
  3. **Issue interim protective orders** to:
    - Safeguard witnesses and prevent retaliation.
    - Preserve all exhibits from suppression, destruction, or alteration.
  4. **Set trial directions** for the pleaded Causes of Action, prioritising disclosure from opposing parties.
  5. **Award costs** and grant such further relief as the Court deems just and proper.
-



## 7.6 Closing Argument

Your Honour, the record before you establishes a **single, continuous conspiracy** — not a collection of unrelated incidents.

The same individuals, corporate structures, and tactics have been used to:

- Fabricate evidence.
- Suppress exculpatory material.
- Exploit media control to distort judicial processes.
- Operate and monetise criminal networks, including CSAM distribution.
- Interfere with sovereign legal actions, as in the *Alpha Nero* matter.

The convergence of **judicial recognition in London** and the proceedings here in Antigua offers a unique opportunity to protect both **individual justice** and **national sovereignty**.

By granting the relief sought, this Court will:

- Affirm Antigua & Barbuda's ability to resist foreign legal-media interference.
- Ensure that suppression of this record is impossible.
- Send a clear signal that **no syndicate, regardless of influence, is above the law**.

The Claimant stands ready to proceed, confident that the evidence — preserved in two jurisdictions — will speak for itself.

Alright — here's **Section 8. Exhibits Volume** in full, with:

- **Index of Exhibits** (Tabs A–G)
- **Narratives** for each exhibit (summarising its contents, relevance, and links)
- **Appendix** containing the **Colour-Coded Evidence Flow Table** and **Row-by-Row Assignments** so the judge can quickly match exhibits to Smoking Guns and Causes of Action.

---

## 8. Exhibits Volume

---

### Index of Exhibits

Tab	Exhibit No.	Title / Description	Date	Smoking Gun Ref.
A – Witness Affidavits				



Tab	Exhibit No.	Title / Description	Date	Smoking Gun Ref.
A1	Affidavit – James C. Bohm, Esq.	[date]	#4, #11	
A2	Affidavit – Yelena Calendar	[date]	#1	
A3	Affidavit – Gary Shoe field	[date]	#2	
A4	Affidavit – Carl Dawson	[date]	#4	
A5	Affidavit – Jaguar Wright	[date]	#4	
A6	Affidavit – Courtney Burgess	[date]	#5	
<b>B – Suppression &amp; Fabrication</b>				
B1	Barry K. Rothman – Text Messages (27 pages)	[date]	#3	
B2	Emails – Fred Heather & Robert Shapiro	[date]	#3	
B3	Historic DMG Press Clippings – Jordan Chandler/Michael Jackson	[date]	#11	
B4	Daniel Kapon Testimony Archive	[date]	#11	
<b>C – Corporate &amp; Technical Proof</b>				
C1	DMG → CBS → Download.com Corporate Chain Diagram	[date]	#8	
C2	LimeWire Technical Logs & Whistleblower Statements	[date]	#7	
C3	CBS Internal Memos – LimeWire/Download.com	[date]	#7	
C4	LimeWire NFT Marketplace Documentation	[date]	#7, #8	
<b>D – Judicial &amp; Procedural</b>				
D1	KB-2025-001991 – Court Transcript Extract (Cotter reading)	[date]	#9	
D2	Annex A – KB Skeleton Argument (cross-referenced)	15 Jul 2025	#1– #12	
D3	Metropolitan Police CCTV Footage & Stills – Daily Mail Assault Claim	[date]	#6	
D4	Press Clippings – Daily Mail/DMG Assault Coverage	[date]	#6	
<b>E – Sovereign Rights &amp; Asset Interference</b>				



Tab	Exhibit No.	Title / Description	Date	Smoking Gun Ref.
E1	US Federal Court Decision – Alpha Nero	[date]	#10	
E2	Alpha Nero Ownership & Registry Documents (incl. Martin DeLuca link)	[date]	#12	
E3	Alpha Nero Media Coverage Timeline – CBS/DMG	[date]	#12	
E4	Boies Schiller Flexner LLP Court Filings – Alpha Nero	[date]	#12	
<b>F – Organised Crime &amp; Racketeering</b>				
F1	Labour Racketeering Case Studies	[date]	#11	
F2	Financial Tracing Reports – Offshore Funds (LimeWire/Download.com)	[date]	#7, #8	
F3	Organised Crime Profiles – Syndicate Figures	[date]	#7, #11, #12	
<b>G – Additional Available Evidence (On Request)</b>				
G1	Ray J Statement & Evidence Set	[date]	–	
G2	Extended Technical Forensics – LimeWire Server Logs	[date]	–	
G3	Expanded Financial Tracing – Alpha Nero & NFT Revenues	[date]	–	

## Exhibit Narratives

### Tab A – Witness Affidavits

- **A1 – Bohm:** Sworn testimony detailing misconduct by legal firms; matches syndicate operational patterns from Chandler/Jackson era to current case.
- **A2 – Yelena Calendar:** Confirms fabricated affidavit filed in her name without consent; direct perjury proof.
- **A3 – Gary Shoefield:** Confirms fabricated affidavit; corroborates Calendar.
- **A4 – Carl Dawson:** Details internal sabotage and IP interference.
- **A5 – Jaguar Wright:** Testifies to trafficking, intimidation by Diddy, Pellicano, others.
- **A6 – Courtney Burgess:** Recounts assault/intimidation; in possession of Cassie Ventura manuscript. [Shockya link](#)

### Tab B – Suppression & Fabrication



- **B1 – Rothman Texts:** 27 pages suppressed; proof of legal manipulation and collusion.
- **B2 – Heather/Shapiro Emails:** Coordination to suppress exculpatory Rothman material.
- **B3 – DMG Clippings Chandler/Jackson:** DMG’s historic promotion of fabricated allegations. [Shockya link](#)
- **B4 – Daniel Kapon Testimony Archive:** Discredited allegations amplified by DMG/Allred.

#### **Tab C – Corporate & Technical Proof**

- **C1 – DMG→CBS Diagram:** Shows corporate chain enabling CSAM distribution. [Shockya link](#)
- **C2 – LimeWire Technical Logs:** Proves Media Defender → CBS → LimeWire CSAM pipeline.
- **C3 – CBS Internal Memos:** Shows corporate knowledge of LimeWire CSAM role.
- **C4 – LimeWire NFT Docs:** Rebrand to NFT monetising trauma content; UMG/Live Nation links.

#### **Tab D – Judicial & Procedural**

- **D1 – Cotter Transcript:** Judicial reading of Skeleton Argument on record.
- **D2 – Skeleton Argument:** Full KB version cross-referenced to Antigua exhibits.
- **D3 – CCTV Footage:** Disproves Daily Mail assault claim.
- **D4 – DMG Assault Coverage:** Coordinated false narrative.

#### **Tab E – Sovereign Rights & Asset Interference**

- **E1 – US Court Decision – Alpha Nero:** Confirms legality of Antigua’s action.
- **E2 – Alpha Nero Ownership/Registry:** Ties to Martin DeLuca.
- **E3 – Alpha Nero Media Timeline:** Shows CBS/DMG alignment with Boies/DeLuca strategy.
- **E4 – Boies Schiller Filings:** Legal attempts to undermine Antigua jurisdiction.

#### **Tab F – Organised Crime & Racketeering**

- **F1 – Labour Racketeering Studies:** Industry blacklisting/coercion patterns.
- **F2 – Offshore Fund Tracing:** Tracks illicit flows from LimeWire/Download.com.
- **F3 – Organised Crime Profiles:** Links syndicate to historic organised crime.





#### **Tab G – Additional Available Evidence**

- **G1 – Ray J Evidence Set:** Links entertainment exploitation network to CSAM pipeline.
  - **G2 – Extended Forensics:** Additional server logs from LimeWire.
  - **G3 – Expanded Financial Tracing:** Offshore structures tied to Alpha Nero and NFT revenues.
-



## Appendix – Colour-Coded Evidence Flow Table & Row Assignments

### Legend – Colour Codes






-  **Light Red** = Witness Intimidation/Tampering
  -  **Light Blue** = Fraud/Evidence Suppression
  -  **Light Green** = CSAM-Related Evidence
  -  **Light Orange** = Sovereignty/Alpha Nero
- 

### Smoking Guns – 12 Proof Points



1. **Fabricated Affidavit** – Yelena Calendar
  2. **Fabricated Affidavit** – Gary Shoefield
  3. **Suppression** – Barry K. Rothman Evidence
  4. **Trafficking/Intimidation** – Jaguar Wright / Carl Dawson Affidavits
  5. **Assault/Intimidation** – Courtney Burgess Affidavit (Cassie Ventura Manuscript)
  6. **Arrest Fabrication** – Daily Mail CCTV disproves
  7. **CSAM Pipeline Suppression** – LimeWire/Download.com
  8. **Corporate Chain** – DMG → CBS → Download.com
  9. **Judicial Acknowledgment** – Cotter reads Skeleton Argument on record
  10. **US Federal Court Decision** – Alpha Nero
  11. **Historic Pattern** – Chandler/Jackson-Kapon – DMG/Allred/Rothman
  12. **Alpha Nero Coordination** – David Boies & Martin DeLuca
- 

### Mini Exhibit Index (Tabs A–G)

#### A – Witness Affidavits

- A1 Bohm – Misconduct (  )
- A2 Calendar – Fabricated Affidavit (  )
- A3 Shoefield – Fabricated Affidavit (  )
- A4 Dawson – Sabotage/IP Interference (  )
- A5 Wright – Trafficking/Intimidation (  )
- A6 Burgess – Assault/Intimidation (  )

#### B – Suppression & Fabrication

- B1 Rothman Texts (  )
- B2 Heather/Shapiro Emails (  )



B3 DMG Clippings – Chandler/Jackson (■)

B4 Kapon Testimony Archive (■)

### **C – Corporate & Technical**

C1 DMG→CBS Diagram (■)

C2 LimeWire Logs (■)

C3 CBS Memos (■)

C4 LimeWire NFT Docs (■)

### **D – Judicial & Procedural**

D1 Cotter Transcript (■)

D2 Skeleton Argument (■)

D3 CCTV Footage (■)

D4 DMG Assault Coverage (■)

### **E – Sovereign Rights**

E1 US Court – Alpha Nero (■)

E2 Alpha Nero Registry (■)

E3 Alpha Nero Media Timeline (■)

E4 Boies Schiller Filings (■)

### **F – Organised Crime & Racketeering**

F1 Labour Racketeering Studies (■)

F2 Offshore Fund Tracing (■)

F3 Organised Crime Profiles (■)

### **G – Additional Available Evidence**

G1 Ray J Evidence Set (■)

G2 Extended Forensics (■)

G3 Expanded Financial Tracing (■)

Exhibit No. & Title	Smoking Gun Ref. & Description	Linked Causes of Action	Primary Colour
A1 – Bohm Affidavit	#4 – Wright/Dawson Trafficking; #11 – Historic Pattern	Witness Intimidation, Labour Racketeering, Conspiracy	■ Light Red
A2 – Yelena Calendar Affidavit	#1 – Fabricated Affidavit – Calendar	Malicious Prosecution, Fraud, Conspiracy	■ Light Blue
A3 – Gary Shoefield Affidavit	#2 – Fabricated Affidavit – Shoefield	Malicious Prosecution, Fraud, Conspiracy	■ Light Blue




























<b>Exhibit No. &amp; Title</b>	<b>Smoking Gun Ref. &amp; Description</b>	<b>Linked Causes of Action</b>	<b>Primary Colour</b>
<b>A4 – Carl Dawson Affidavit</b>	#4 – Wright/Dawson Trafficking	Witness Intimidation, Labour Racketeering	 Light Red
<b>A5 – Jaguar Wright Affidavit</b>	#4 – Wright/Dawson Trafficking	Witness Intimidation, Labour Racketeering, Crimes Against Humanity	 Light Red
<b>A6 – Courtney Burgess Affidavit</b>	#5 – Burgess Assault/Manuscript	Witness Intimidation, Malicious Prosecution	 Light Red
<b>B1 – Rothman Texts (27 pages)</b>	#3 – Suppression; #11 – Historic Pattern	Fraud, Conspiracy, Labour Racketeering	 Light Blue
<b>B2 – Heather/Shapiro Emails</b>	#3 – Suppression	Fraud, Conspiracy	 Light Blue
<b>B3 – DMG Clippings Chandler/Jackson</b>	#11 – Historic Pattern	Defamation, Labour Racketeering, Conspiracy	 Light Blue
<b>B4 – Daniel Kapon Testimony Archive</b>	#11 – Historic Pattern	Defamation, Labour Racketeering, Conspiracy	 Light Blue
<b>C1 – DMG→CBS Diagram</b>	#8 – Corporate Chain	Crimes Against Humanity, Labour Racketeering, Sovereign Rights Breach	 Light Green
<b>C2 – LimeWire Technical Logs</b>	#7 – CSAM Pipeline	Crimes Against Humanity, Fraud	 Light Green
<b>C3 – CBS Internal Memos</b>	#7 – CSAM Pipeline	Crimes Against Humanity, Fraud	 Light Green
<b>C4 – LimeWire NFT Docs</b>	#7 – CSAM Pipeline; #8 – Corporate Chain	Crimes Against Humanity, Labour Racketeering	 Light Green
<b>D1 – Cotter Transcript</b>	#9 – Judicial Acknowledgment	All Causes of Action	 Light Blue (Neutral)
<b>D2 – Skeleton Argument</b>	#1–#12 – All Smoking Guns	All Causes of Action	 Light Blue (Neutral)
<b>D3 – CCTV Footage (Daily Mail)</b>	#6 – Arrest Fabrication	Defamation, Malicious Prosecution	 Light Blue
<b>D4 – DMG Assault Coverage</b>	#6 – Arrest Fabrication	Defamation, Malicious Prosecution	 Light Blue



Exhibit No. & Title	Smoking Gun Ref. & Description	Linked Causes of Action	Primary Colour
E1 – US Court Decision – Alpha Nero	#10 – Alpha Nero Decision	Sovereign Rights Breach	 Light Orange
E2 – Alpha Nero Ownership/Registry	#12 – Boies/DeLuca Coordination	Sovereign Rights Breach, Fraud, Conspiracy	 Light Orange
E3 – Alpha Nero Media Timeline	#12 – Boies/DeLuca Coordination	Sovereign Rights Breach, Conspiracy	 Light Orange
E4 – Boies Schiller Filings – Alpha Nero	#12 – Boies/DeLuca Coordination	Sovereign Rights Breach, Conspiracy	 Light Orange
F1 – Labour Racketeering Studies	#11 – Historic Pattern; #8 – Corporate Chain	Labour Racketeering, Conspiracy	 Light Blue
F2 – Offshore Fund Tracing	#7 – CSAM Pipeline; #8 – Corporate Chain	Crimes Against Humanity, Labour Racketeering, Fraud	 Light Green
F3 – Organised Crime Profiles	#7 – CSAM Pipeline; #11 – Historic Pattern; #12 – Boies/DeLuca Coordination	Crimes Against Humanity, Sovereign Rights Breach, Labour Racketeering	 Light Green
G1 – Ray J Evidence Set	#4 – Wright/Dawson Trafficking; #7 – CSAM Pipeline; #11 – Historic Pattern	Witness Intimidation, Crimes Against Humanity, Labour Racketeering	 Light Red
G2 – Extended Forensics	#7 – CSAM Pipeline	Crimes Against Humanity	 Light Green
G3 – Expanded Financial Tracing	#7 – CSAM Pipeline; #12 – Boies/DeLuca Coordination	Crimes Against Humanity, Sovereign Rights Breach, Fraud	 Light Green

In closing, the Court is invited to view the events of the past two months — including the sustained procedural obstruction at the Registry, the cross-jurisdictional evidence lodged in the London High Court (*KB-2025-001991*), and the strategic withdrawal of enforcement proceedings in *Jane Doe v. David* (20STCV37498) — as interconnected components of a wider pattern. The formal **Notice of Withdrawal** filed on 17 July 2025, halting a scheduled post-judgment examination in pursuit of a USD \$900 million verdict, underscores the instability and tactical nature of that judgment. This development, when considered alongside the documentary record in Antigua (*ANUHCV2025/0149*), strengthens the inference of a coordinated transnational campaign aimed at prejudicing the Claimant across multiple fora. The Claimant respectfully urges the Court to take judicial notice of these facts, adopt the Proposed Case Management Order, and ensure that this matter proceeds without further delay or procedural prejudice.



---

**Yours faithfully,**

A handwritten signature in black ink, consisting of a large, loopy 'D' followed by a smaller, more complex scribble.

**Alkiviades David**  
Claimant in Person  
Email: **alki@filmon.com**  
WhatsApp: **+1 268 780 4133**  
St. John's, Antigua and Barbuda

---