

Case Number :ANUHCV2025/0149

IN THE HIGH COURT OF JUSTICE

ANTIGUA AND BARBUDA

Claim No: [To be assigned by Registry]

BETWEEN:

ALKIVIADES DAVID

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

Claimant

— AND —

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

Defendants

STATEMENT OF CLAIM

1. Parties

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



Submitted Date:17/04/2025 13:21

Filed Date:17/04/2025 13:21

Fees Paid:52.00

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

2. Jurisdiction

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

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

3. Factual Background

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

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

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

4. Causes of Action

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

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

5. Relief Sought

The Claimant respectfully seeks:

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

6. Verification

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

DATED this 17 day of April 2025.



COMMISSIONER FOR OATH
ANTIGUA & BARBUDA

Alkiviades David, Claimant

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

Email: ceo@swissx.com

Phone: +1 (268) 780-4133