

**IN THE JUDICIAL COMMITTEE OF THE PRIVY COUNCIL  
ON APPEAL FROM THE EASTERN CARIBBEAN SUPREME COURT  
ANTIGUA AND BARBUDA**

**ELITE ADDENDUM TO THE APPLICATION FOR STAY**

*Asot Michael, Prime Minister Gaston Browne, Brian Stuart-Young, the Carbon Union, and Public  
Notice through the REDD-Monitor Article*

Re: London KB-2025-001991 / CA-2025-002562

Antigua ANUHCV2025/0149

**ALKIVIADES DAVID**

*Appellant (Litigant in Person)*

1. This addendum is advanced on a strictly protective basis and should be read together with the Application for Stay, the supporting affidavit / witness statement, and the exhibits already filed or tendered in support.

2. I do not invite the Judicial Committee by this addendum to determine every wider allegation or contextual matter said to arise elsewhere. The purpose of this addendum is narrower: to explain why the present proceedings, on my case, engage a wider sovereign and public-interest dimension extending beyond an ordinary private dispute.

**Asot Michael**

3. Asot Michael was very close to me and, as I have already placed on record, he was my partner in Antigua.

4. I rely on that fact not merely as personal background, but because the materials already exhibited identify a dated communications trail involving Asot Michael, Clark Hill, and Kingsley Napley, and request preservation of non-privileged factual records and metadata. That pathway reinforces the Antigua nexus and the need for preservation.

5. There are many others affected by the wider coercive patterns said to arise in the record, but for me the matter is also deeply personal. Asot Michael was very close to me, and his murder demands justice.

**Prime Minister Gaston Browne and the Parallel Sovereign-Facing Context**

6. I further say that related sovereign-facing litigation has also arisen involving Prime Minister Gaston Browne and Antigua and Barbuda.

7. In the SDNY Alfa Nero matter, Prime Minister Gaston Browne was among the movants who sought to quash subpoenas directed at financial records said to bear upon proceedings and sovereign interests connected to Antigua and Barbuda, and those motions were granted. I rely on that matter not to overstate identity of parties or posture, but to show that parallel litigation has already engaged sovereign-facing issues concerning Antigua and Barbuda.

8. I also rely on the public broadcast transcript in which Prime Minister Browne is recorded as characterising the related litigation as fabricated, a fishing expedition, and an effort to undermine Antigua and Barbuda. I do not rely on that as conclusive proof of every fact asserted there. I rely on it to show that the wider dispute has already acquired a public sovereign and reputational dimension affecting Antigua and Barbuda as a nation.

**Brian Stuart-Young**

9. I further say that Brian Stuart-Young is a material figure in the wider factual matrix and is not peripheral to the case.

10. In the Antigua stay notice already before the Court, proceedings concerning Brian Stuart-Young and Global Bank of Commerce are described as forming part of the same wider matrix as ANUHCV2025/0149, and Prime Minister Gaston Browne is likewise described there as a victim of the same lawfare pattern. I rely on that material not to conflate distinct proceedings, but to show that the present case is said to sit within a wider sovereign-facing and reputational context in which Antiguan figures, institutions, and associated parties have been drawn into related litigation and alleged defamation.

11. On my case, Brian Stuart-Young is well known within the Caribbean judicial and institutional environment by reason of his longstanding public and financial roles, including his association with Global Bank of Commerce. I therefore say that he is material to the wider context and not merely an incidental or remote name.

### **The Carbon Union and the Public Interest**

12. I also respectfully say that the present proceedings engage a wider public-interest and sovereign-economic dimension affecting the people of what I describe as the Carbon Union.

13. In ANUHCV2025/0149, I have filed materials concerning the Antigua and Barbuda Carbon Compliance Market Act (2025). Those materials frame the case as going to the lawful recognition and protection of a sovereign carbon-market framework, the creation and treatment of carbon credits as a lawful financial instrument, and the wider economic future of Antigua and Barbuda and aligned communities.

14. On my case, that framework has a liberating public purpose because it is capable of freeing our people from dependency on extractive financial structures and supporting a lawful path toward economic self-determination. In that sense, I respectfully say that this case is, on my case, justice not only for me personally, but for the people whose interests are bound up with that lawful sovereign carbon-market framework and the wider Carbon Union.

15. I further say that this initiative is non-partisan in character and is, on my case, above the incentives of politics. I rely on this point not to politicise the application, but to make clear that the issues raised here concern lawful economic self-determination, the integrity of public institutions, and the protection of a sovereign carbon-market framework whose effects, on my case, reach far beyond the interests of the immediate parties.

### **Public Notice and the REDD-Monitor Article**

16. I further say that the alleged defamation did not remain confined to a private quarrel, but escalated into a national and international public debate.

17. I rely in that regard on the REDD-Monitor article as evidence of public dissemination and public notice of the allegations being made concerning SwissX, the Antigua carbon project, Verra, and related persons and institutions. I do not rely on that publication as proof that every statement within it is true. I rely on it as evidence that those allegations were publicly circulated, that reputational and institutional consequences were capable of flowing from them, and that the wider dispute had entered the public domain.

18. The article also records that Diann Black-Layne publicly accused me of leading a character assassination campaign against her. Again, I rely on that not to prove the truth of every public accusation, but to show publication, reputational escalation, and the widening of the dispute into a matter of public controversy.

### **Why This Matters to the Present Application**

**19.** I rely on the matters above not to transform this application into a political manifesto, but because they reinforce the proposition that the present proceedings should not be treated as a narrow private enforcement dispute detached from their wider context.

**20.** On my case, the combination of the Antigua nexus through Asot Michael, the parallel sovereign-facing context involving Prime Minister Gaston Browne, the material role of Brian Stuart-Young within the wider matrix, the filed Carbon Compliance Market Act materials engaging the public interest of the Carbon Union, the non-partisan and public-interest character of the initiative, and the public dissemination and reputational consequences evidenced by the REDD-Monitor article and related broadcast material means that the present case carries a significance extending beyond the immediate parties and that the Court should proceed with caution, preservation, and protective restraint.

**21.** I therefore respectfully ask that this addendum be read as reinforcing the need for the stay, the preservation directions sought, and the recognition that the proceedings engage a wider public-interest and sovereign dimension on my case.

*Deo gratias.*

**ALKIVIADES DAVID**

Appellant, Litigant in Person