

## Ajay Fournillier

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**From:** Alki David <filmonpersonal@gmail.com>  
**Sent:** 28 November 2025 16:06  
**To:** Ajay Fournillier  
**Cc:** Rebecca Hume; Boniswa Dzere; Morgan, June; KB Judges Listing Office; kb.enquiries@justice.gov.uk; Kirsty Price; legalaffairs@ab.gov.ag; Jenique Joseph; Earley, Phil; Jessica Green; chiefclerk.kb@justice.gov.uk  
**Subject:** Re: [FSI-FSI.FID4981609]  
**Attachments:** 1000054113.jpg; 1000054114.jpg

**Subject:** Material Update – Default of Howard Kennedy in Antigua High Court & Active SRA Investigation

**To:** [kristy.price@sra.org.uk](mailto:kristy.price@sra.org.uk)  
**CC:** [Rebecca.Hume@howardkennedy.com](mailto:Rebecca.Hume@howardkennedy.com); [Ajay.Fournillier@howardkennedy.com](mailto:Ajay.Fournillier@howardkennedy.com); Justice Barry Cotter KC; Attorney General of Antigua & Barbuda; Mac Warner (DOJ Civil Division)

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Dear Ms. Price,

Thank you for acknowledging the active SRA investigation into my complaints regarding Howard Kennedy LLP.

I am now submitting **material new evidence** that directly concerns the conduct of Howard Kennedy and should be added to the investigation file.

I attach two documents (I have other copies that are better, but this copy will suffice for now) issued by the **Eastern Caribbean Supreme Court (Antigua & Barbuda)** in Claim No. **ANUHCV2025/0149**, in which:

1. **Howard Kennedy LLP and their clients were properly served,**
2. The High Court has **accepted jurisdiction,**
3. No defendant filed an appearance or defence,
4. All defendants are therefore **in default in a Commonwealth jurisdiction,**
5. The matter is set for **default judgment on 16 January 2026,** and
6. The Honourable Attorney General of Antigua & Barbuda is actively engaged.

Despite this, Howard Kennedy wrote to me today without disclosing their status as **defaulted foreign defendants** and suggested that addressing these matters was not “appropriate,” which is materially misleading.

This omission is significant in the context of:

- their obligations to foreign courts,
- the ongoing UK proceedings,
- their duties to a vulnerable and disabled litigant, and
- their prior communications with my financial institutions.

I respectfully request that this evidence be incorporated into the SRA investigation.

Yours sincerely,

**Alkiviades David**

Ambassador-at-Large for the Green Economy

Government of Antigua & Barbuda

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**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 29<sup>th</sup> DAY October 2025**

**ENTERED : THE DAY 2025**

**APPEARANCES :**

**UPON THIS CLAIM** filed herein on 17<sup>th</sup> 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

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 15<sup>th</sup> 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 16<sup>th</sup> January 2026 for further hearing.
4. The shall have carriage of this order.

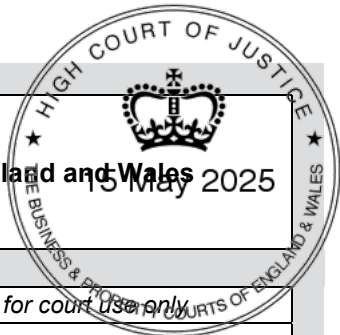
Rene Williams  
Approved  
7.11.2025

BY THE COURT  
REGISTRAR



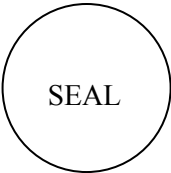
**Claim Form  
(CPR Part 8)**

In the	High Court of Justice Business and Property Courts of England and Wales King's Bench Division Commercial Court
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	for court use only
Claim No.	CL-2025-000224
Issue date	

Claimant(s)  
MAHIM KHAN



Defendant(s)  
ALKIVIADES DAVID (also known as ALKI DAVID)

Name and Address of Defendant receiving this claim form

Alkiviades David (also known as Alki David)  
4 Wilton Place,  
London  
SW1X 8RH

Court fee	10000.00
Legal representative's costs	TBC

Claim No.	
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Details of claim

See particulars of claim attached

Howard Kennedy LLP  
No. 1 London Bridge,  
London  
SE1 9BG  
Email: [rebecca.hume@howardkennedy.com](mailto:rebecca.hume@howardkennedy.com) and  
[ajay.fournillier@howardkennedy.com](mailto:ajay.fournillier@howardkennedy.com)  
Ref: RH/061514.00004

Claimant's or legal representative's address to which documents or payments should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.



## Statement of truth

**The Claimant understands 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.**

- ☐ I **believe** that the facts stated in this claim form and any attached sheets are true.
- ☒ **The Claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

Signature



- ☐ Claimant
- ☐ Litigation friend (where claimant is a child or protected party)
- ☒ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

Month

Year

15

05

2025

Full name

Rebecca Hume

Name of claimant's legal representative's firm

Howard Kennedy LLP

If signing on behalf of firm or company give position or office held

Partner

**Claim No.**

**IN THE HIGH COURT OF JUSTICE  
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES  
KING'S BENCH DIVISION  
COMMERCIAL COURT**

**BETWEEN:**

**MAHIM KHAN (Claimant)**

**and**

**ALKIVIADES DAVID (also (Defendant)  
known as ALKI DAVID)**

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**PARTICULARS OF CLAIM**  
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**The parties and the claim**

1. The Claimant worked for the Defendant and a number of companies in California. The Defendant was the Chief Executive Officer of all or most of the companies and during her employment, from October 2014 to 15 October 2015, the Defendant wilfully, knowingly and intentionally discriminated against her, subjected her to sexual harassment and sexual assaults and committed violent acts against her. As a consequence of the Defendant's conduct the Claimant suffered economic loss and suffered and will continue to suffer extreme and severe mental anguish and emotional distress.
2. On 14 March 2017 the Claimant commenced proceedings against the Defendant and (amongst other) various corporate entities of which the Defendant was President and CEO in the Superior Court of the State of California for the County of Los Angeles case



no BC654017 for damages for sexual harassment and battery of the Claimant at work (**US Proceedings**).

3. The Defendant filed a defence in the US Proceedings on 1 May 2017 and subsequently participated in and defended the US Proceedings including filing appeals against the decision of the Superior Court of the State of California for the County of Los Angeles.
4. On 21 January 2020, following a trial by jury in the US Proceedings judgment was obtained by the Claimant against the Defendant (and all other defendants) to the US Proceedings jointly and severally for damages (**Judgment**).
5. Pursuant the Judgment the following orders were made against the Defendant:
  - 5.1 Compensatory damages in the sum of US\$8,250,000 (**Compensatory Damages**) together with interest thereon at the rate of 10% per annum from 21 January 2020 until payment. The Compensatory Damages comprised past non-economic loss, including physical pain and mental suffering (US\$3,000,000); future economic loss, including physical pain and mental suffering (US\$5,000,000); past economic damages (lost earnings) US\$40,000 and future economic damages (future lost earnings and medical expenses (US\$210,000).
  - 5.2 What the US court describes as "*punitive or exemplary damages*" in the sum of US\$50,000,000 being in respect of the Defendant's harassing conduct with malice, oppression and fraud (**Exemplary Damages**) together with interest at the rate of 10% per annum from 21 January 2020 until payment; and
  - 5.3 Attorney's fees in the sum of US\$1,398,885, and costs in the sum of US\$74,165.60 (**Legal Costs**) together with interest at the rate of 10% per annum from 3 February 2021 until payment. The total sum the Superior Court of the State of California ordered the Defendant to pay to the Claimant was US\$59,723,050.60 together with interest thereon as set out in paragraph 5 (**Debt**).

6. On 9 November 2020 the Defendant appealed the Judgment to the Court of Appeal of the State of California (**US Appeal Court**) and on 27 May 2022 the Defendant's appeal was denied.
7. On 6 July 2022 the Defendant appealed the decision of the US Appeal Court and on 14 September 2022 the Supreme Court declined to hear that appeal. The Defendant's time to further appeal the Judgment has expired and all rights of further appeal of the Judgment have been exhausted. In the circumstances the Judgment is final and conclusive against the Defendant under US law.

### **Punitive/Exemplary Damages**

8. The jury in the Trial Court found that the Defendant engaged "*in harassing and/or violent conduct with malice, oppression or fraud*" which justified the Exemplary Damages in the sum of US\$50,000,000 pursuant to Cal. Civ. §3294 which permits awards of punitive damages "*for the same of example and by way of punishing the defendant*". The Defendant, on appeal, contended that the award was reviewable as unconstitutional. The US Appeal Court reviewed the case by reference to the "constitutional goalposts", namely (1) the degree of reprehensibility of the defendant's misconduct (the most important factor); (2) the disparity between the actual or potential harm suffered by the Claimant and the punitive damages award; and (3) the difference between the punitive damages awarded by the jury and the civil penalties authorised or imposed in comparable cases. The US Appeal Court also reviewed the case law on the disparity between punitive damages and actual damages.
9. The US Appeal Court concluded that the 6 to 1 ratio of punitive damages (US\$50,000,000) and compensatory damages (US\$8,000,000) was warranted because the Defendant's "*highly reprehensible, degrading and outrageous behaviour, the award meets the overarching standard of "reasonableness"*" and stated that "[*The Defendant*] *took advantage of a low-wage entertainment industry worker, knowing it would be difficult for her to find paying work elsewhere or avoid homelessness unless she tolerated his abuse. His indecent conduct deserves the harshest community condemnation to serve as deterrent and punishment.*"
10. The US Appeal Court also took into account the judgments in other sexual harassment cases against the Defendant brought by the Claimant's co-workers the verdicts in which

had no impact on the Defendant's attitude, and which showed that his sexual misbehaviour was common practice.

11. In all the circumstances this is a case in which the English court should recognise the US Judgment for exemplary damages which is not impeachable on the ground that its enforcement would be contrary to public policy or otherwise.

#### **Defendant's failure to comply with Judgment**

12. The Defendant has failed to pay the Debt.
13. On or about 1 July 2021 the Claimant commenced enforcement proceedings in California and sought to enforce the judgment against the Defendant's beachfront mansion in Malibu (**Malibu Property**). The Defendant, as part of the transaction for the sale of the Malibu Property was required by the senior lender, Axos Bank, to make payments into two bank accounts. The Claimant applied for the funds in those accounts to be declared as owned by the Defendant and to be paid to her. Ultimately the Claimant received, pursuant to settlement involving others, an amount not exceeding \$1.2 million in November 2024 which sum has been applied in part satisfaction of the Claimant's Exemplary Damages.
14. On or about 14 October 2021 the Claimant pursued the domestication and enforcement of the Judgment in Switzerland and a request for the attachment of the Defendant's Swiss chalet. On 18 October 2021 the Claimant's request for an attachment of the Defendant's Swiss chalet was denied because the Judgment was not final and meet the requirements for recognition in Switzerland due to the Defendant's appeal referred to at paragraph 6 above. The Claimant failed to recover any money from the proceeds of sale from the Defendant's Swiss chalet due to the Swiss chalet being sold on or about 29 December 2022 being before the Claimant made a second request for the attachment of the Defendant's Swiss chalet made by the Claimant on or about 7 March 2023.
15. On 18 March 2022 the Claimant applied to the Greek court for the recognition of the US Judgment in Greece. On 3 February 2023 the Claimant's judgment was recognised by the Greek court in full (including the award of punitive/exemplary damages).
16. On 27 September 2023 the Defendant filed an appeal against recognition of the US Judgment in the Athens Court of Appeal. The appeal was refused on 8 January 2024.

17. On 12 February 2024 the Defendant appealed the decision of the Athens Court of Appeal to the Supreme Court. As at the date of hereof the Supreme Court has not handed down its decision.
18. In the meantime, the Defendant's property in Greece (**Spetses Property**) was sold at auction on 27 September 2023 for €13,120,014. The sum of €13,060,880.37 is currently held in escrow and a Greek notary has determined that €8,380,982.76 is to be distributed to the Claimant.
19. On 15 December 2023 the Defendant filed an objection against the list of creditors with the Pireaus First Instance Court which was heard on 25 October 2024 (**Creditor Objection**). No decision has been handed down by the Pireaus First Instance Court as at the date hereof.
20. On 10 April 2024 the Claimant (together with Lauren Reeves) filed an application before the Pireaus First Instance Court requesting the Court to require the notary to make an immediate distribution of the auction proceeds. The hearing took place on 9 October 2024. On 12 March 2025 the Pireaus First Instance Court denied the application but held that the Creditor Objection should not have the effect of suspending the distribution of the proceeds of sale from the Spetses Property because the Defendant is the debtor and not a creditor. The Claimant's share of the proceeds of sale from the Spetses Property referred to at paragraph 18 above, will be applied in part satisfaction of the Exemplary Damages once received by the Claimant.
21. In the circumstances as at the date of these Particulars of Claim the US Judgment against the Defendant is for:
  - 21.1 US\$8,250,000 in respect of the Compensatory Damages together with interest thereon of US\$4,387,191.83 from 21 January 2020 to the date of these Particulars of Claim which is in total US\$12,637,191.83 and interest is increasing by US\$2,260.27 a day until payment;
  - 21.2 US\$48,800,000 in respect of the Exemplary Damages (being the sum of US\$50,000,000 less US\$1,200,000 referred to at paragraph 13 above) together with interest thereon of US\$25,950,904.08 from 21 January 2020 to

the date of these Particulars of Claim which is in total US\$74,750,904.08 and interest is increasing by US\$13,369.86 a day until payment; and

- 21.3 US\$1,473,050.60 in respect of Legal Costs together with interest thereon of US\$630,384.93 from 3 February 2021 to the date of these Particulars of Claim which is in total US\$2,103,435.53 and interest is increasing by US\$403.58 a day until payment.
22. The Claimant, taking into account the sums already received by her from the enforcement in the US and applied to reduce the Exemplary Damages, seeks an order that the Defendant pays to the Claimant the following sums:
- 22.1 US\$8,250,000 in respect of Compensatory Damages together with interest thereon from 21 January 2020 to the date of these Particulars of Claim of US\$4,387,191.83; and/or
- 22.2 US\$48,800,000 in respect of Exemplary Damages together with interest thereon from 21 January 2020 to the date of these Particulars of Claim of US\$25,950,904.08; and/or
- 22.3 US\$1,473,050.60 in respect of Legal Costs together with interest thereon of US\$630,384.93;
- 22.4 AND interest from the date hereof to the date of payment on each of the sums at 22.1 to 22.4 inclusive at the rate of 10% per annum in accordance with the interest ordered in the US Proceedings;
- 22.5 In the alternative interest pursuant to Section 35A of the Senior Courts Act 1981 at such rates and for such periods or amounts as the Court thinks fit.

**AND THE CLAIMANT CLAIMS:**

- (1) payment of the sum set out in paragraph 22.1 above;
- (2) payment of the sum set out in paragraph 22.2 above;
- (3) payment of the sum set out at paragraph 22.3 above;
- (4) interest as set out in paragraph 22.4 above or in the alternative paragraph 22.5;
- (5) An order that the Defendant do pay the costs of an occasioned by this claim.

(6) Such further order or relief as the Court thinks fit.

Hilary Stonefrost

15 May 2025

Served this       day of       2025, by Howard Kennedy LLP of No. 1 London Bridge,  
London SE1 9BG, solicitors for the Claimant.

**Statement of truth**

I am duly authorised by the Claimant to sign this statement.

The Claimant believes that the facts stated in these Particulars of Claim are true. The Claimant understands that proceedings for contempt of court may be brought against anyone 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.

Full name: Rebecca Hume

Position or office held: Partner

Signed:

(If signing on behalf of firm, company or corporation)

A handwritten signature in black ink that reads "Rebecca Hume". The signature is written in a cursive style with a large, looped initial 'R'.

Claim No.

**IN THE HIGH COURT OF JUSTICE  
BUSINESS AND PROPERTY  
COURTS OF ENGLAND AND  
WALES  
KING'S BENCH DIVISION  
COMMERCIAL COURT**

**BETWEEN:**

**MAHIM KHAN                      Claimant**

**- and -**

**ALKIVIADES                      Defendant  
DAVID (also  
known as ALKI  
DAVID)**

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**PARTICULARS  
OF CLAIM**  
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Howard Kennedy LLP  
No.1 London Bridge,  
London SE1 9BG  
Telephone: +44 20 3755 6000  
Ref: RH/061514.00004  
Solicitors for the Claimant



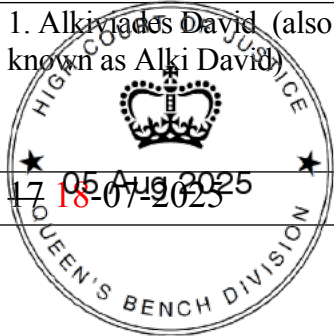
Judgment for Claimants against the Defendant  
(In Default)

In the <b>King's Bench Claims</b> of the High Court of Justice	
<b>Claim Number</b>	<b><u>KB-2025-001991</u></b>
<b>Claimants</b>	1. Mahim Khan
<b>Defendant</b>	1. Alkiviades David (also known as Alki David)
<b>Date</b>	17 05 Aug 2025 <del>18-07-2025</del>

To the Defendant

1. Alkiviades David (Alkiviades David (also known as Alki David)

4 Wilton Place, London SW1X 8RH



KB-2025-001991

To the Defendant

UPON this Order being amended pursuant to “The Slip Rule” CPR 40.12

You have failed to file an Acknowledgement of Service or a Defence in this claim

It is therefore ordered that you must pay the Claimant USD \$14,913,777.61 and GBP £10,140.00 (inclusive of costs)

You must pay to the Claimants a total of

USD \$14,913,777.61 and GBP £10,140.00 (inclusive of costs)

Warning

If you ignore this order your goods may be removed and sold, or other enforcement proceedings may be taken against you. If this happens further costs will be added. If your circumstances change and you cannot pay, ask at the court office what you can do.

## Notes for the Defendant

If you did reply to the claim form and believe judgment has been entered wrongly in default, you may apply to the court office giving your reasons why the judgment should be set aside. An application form is available for you to use and you will need to pay a fee. A hearing be arranged and you will be told when and where it will take place. If you live in, or carry on business in another court's area, the claim may be transferred to that court.

If your judgment is for £5,000 or more, or it is in respect of a debt which attracts contractual or statutory interest for late payment, the claimant may be entitled to further interest.

### Address for Payment

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

[[Claimant Legal Representative Reference]]

Solicitors for the Claimants

### How to Pay

- **Payment(s) must be made to the person named at the address for payment, giving the claimant's reference and claim number.**
- **DO NOT bring or send payments to the court – They will not be accepted.**
- You should allow at least 4 days for your payment to reach the claimant or his representative.
- Make sure that you keep records and can account for all payments made. Proof may be required if there is any disagreement. It is not safe to send cash unless you use registered post.
- Leaflets on registered judgments, how to pay and what to do if you cannot pay are available from the court

The Court Office at Room E07, Royal Courts of Justice, Strand, London, London WC2A 2LL, DX 44458 Strand is open between 10 a.m. to 4:30 p.m. Monday to Friday. When corresponding with the court, please address forms or letters to The King's Bench Division and quote the case number.

Details of this Judgment will be entered in a public register, the Register of Judgments Orders and Fines. They will then be passed to credit reference agencies, who will supply then to credit grantors and others seeking information on your financial standing. **This will make it difficult for you to get credit.** A list of credit reference agencies is available from Registry Trust Limited, 153/157 Cleveland Street, London, W1T 6QR. **If you pay in full within one month**, you can ask the court to cancel the entry on the Register. You will need to give the court proof of payment. If you **also** want a Certificate of Cancellation from the court, there is a fee for this. If you pay the debt in full after one month, you can ask the court to mark entry as satisfied and, for a fee, obtain a Certificate of Satisfaction to prove that the debt has been paid.

**Special Delivery by 1**

£9.25 00.090kg  
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1-1670201 VAT y4  
PRN: 0211-1905-01A3-9F8F



Howard Kennedy Solicitors

1 London Bridge

London

SE1 9BG.

AJ Fournier



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SD 1pm

P0550 Rev Feb 18



IN THE HIGH COURT OF JUSTICE  
ANTIGUA & BARBUDA

Submitted Date:24/09/2025 11:48

Filed Date:24/09/2025 11:49

Fees Paid:42.00

Case No: ANUHCv2025/0149

BETWEEN:

ALKIVIADES ANDREW DAVID

Applicant

and

GLORIA ALLRED, LISA BLOOM, THOMAS GIRARDI, ELIZABETH TAYLOR,  
MAHIM KHAN, et al.

Respondents

AMENDED STATEMENT OF CLAIM

1. Introduction

1. The Applicant, Alkiviades Andrew David, appears Pro Se, as Ambassador-at-Large for Antigua & Barbuda. This Honourable Court has jurisdiction under the Civil Procedure Rules of Antigua & Barbuda. This is an amendment under Rule 20 CPR expanding the Defendant list and the Particulars of Damage.

2. The Parties

2. The Applicant is the founder of SwissX and Ambassador-at-Large for Antigua & Barbuda, engaged in sovereign carbon sequestration and biofuel projects.  
3. The Respondents include attorneys, media conglomerates, financial institutions and their CEOs, enforcers, and political defendants, as listed in Annex A (Schedule of Defendants).

3. Background Facts

4. The Applicant, in partnership with the Government of Antigua & Barbuda, the SwissX Sovereign Wealth Fund, and the Farmers Antigua Trust, developed the 28 million acre Coral & Seagrass Restoration Project. This project has an annual carbon sequestration capacity of approximately 17–19 million metric tons, valued at USD \$8 billion per annum (Carbon Core & FAT Report, Exhibit CC1).  
5. The project would render Antigua & Barbuda one of the first carbon-negative nations globally, with sovereign wealth generated through carbon credit monetization.  
6. Respondents, through defamatory campaigns, fraudulent litigation including the Alpha Nero case, and media suppression, obstructed this initiative causing catastrophic sovereign and private



losses.

#### 4. Fossil Fuel Motive and Conflicts of Interest

7. Many Respondents are directly tied to fossil fuel infrastructure through the banks and corporations they control. These banks (JP Morgan, Citibank, HSBC, UBS, Deutsche Bank, Prudential, ICICI, Wells Fargo, Bank of America) are leading financiers of oil, gas, and coal. Media entities (Paramount, Disney, Fox, Comcast, Sony, Vivendi, Warner) are historically funded through fossil-linked financing syndicates. Sipur Entertainment, controlled by Shari Redstone, receives capital linked to fossil fuel infrastructure.

8. These Defendants had a direct interest in obstructing Antigua's proof-of-concept as a sovereign, carbon-credit-driven economy.

#### 5. Causes of Action

9. Defamation: Publication of false and damaging statements globally.

10. Civil Conspiracy: Collusion between lawyers, banks, media entities, and political actors.

11. Tortious Interference: Disruption of sovereign agreements and carbon credit projects.

12. Fraud & Misrepresentation: False lawsuits and weaponized litigation.

13. Breach of Sovereign Economic Rights: Obstruction of Antigua's carbon-credit sovereignty.

#### 6. Particulars of Damage

14. Carbon Credit Losses: USD \$8 billion annually; USD \$80 billion per decade; USD \$400 billion over five decades. Losses caused by obstruction of the Antigua Carbon Registry.

15. Biofuel Production Losses: SwissX B100 biofuel production was delayed by three years due to defamation, causing lost revenues of USD \$1.5 billion over that period, with continuing opportunity losses.

16. Tourism & Investment: Reputational damage caused loss of multi-billion-dollar inflows.

17. Political Harm: Members of the UPP Executive knowingly colluded with foreign cartel actors to undermine sovereign projects for partisan gain.

#### 7. Relief Sought

18. Judgment against Respondents jointly and severally.

19. Damages in excess of USD \$80 billion, plus continuing annual accrual.

20. Declaratory relief affirming Antigua's right to carbon sovereignty.

21. Costs, interest, and such other relief as the Court deems just.

#### Annex A – Schedule of Defendants

The Respondents include:

Attorneys & Cartel Operators: Thomas Girardi / Girardi Keese; Gloria Allred; Lisa Bloom; Joseph Chora; Nathan Goldberg; Renee Mochkatel; Dolores Leal; Barry K. Rothman (deceased); Carole Lieberman; Louis Freeh; Robert Shapiro; Eric Wexler; Fred Heather; John Branca.

Plaintiffs in Fraudulent Claims: Elizabeth Taylor; Mahim Khan; Lauren Reeves; Chasity Jones; Marguerita Nichols (Jane Doe).

Judicial Machinery/Forums: LA Superior Court Judges (Michelle Williams, Terry Green, Christopher Lui, Rafael Ongkeko, Yolanda Orozco); California Court of Appeal, Second District; JAMS Arbitration.

Media Corporations: Shari Redstone / National Amusements; Paramount Global; CBS Interactive; Red Ventures; CNET; Disney; ABC; Vivid Entertainment; Warner Music Group; Vivendi; Universal Music Group; Sony Music; Sony Pictures; Fox Corp; News Corp; Comcast; NBCUniversal; Brian Roberts; Sipur Entertainment.

Financial Institutions & CEOs: Bank of America – Brian Moynihan; Wells Fargo – Charles Scharf; Deutsche Bank – Christian Sewing; Citibank – Jane Fraser; JPMorgan Chase – Jamie Dimon; HSBC – Noel Quinn; Credit Suisse – Ulrich Körner (former)/UBS – Sergio Ermotti; Prudential – Charles Lowrey; ICICI Prudential – Anup Bagchi.

Enforcers/Fixers: Anthony Pellicano.

Political Defendants (United Progressive Party): Harold Lovell; D. Gisele Isaac; Richard Lewis; Pearl Quinn-Williams; Franz deFreitas; Cleon Athill; all other members of the UPP Executive Committee.

Respectfully submitted,

Digitally signed by:

ALKIVIADES ANDREW DAVID

Pro Se, Ambassador-at-Large, Antigua & Barbuda

Applicant in Person

Date: September 24, 2025







IN THE HIGH COURT OF JUSTICE  
ANTIGUA & BARBUDA

Submitted Date:24/09/2025 11:48

Filed Date:24/09/2025 11:49

Fees Paid:42.00

Case No: ANUHCv2025/0149

BETWEEN:

ALKIVIADES ANDREW DAVID

Applicant

and

GLORIA ALLRED, LISA BLOOM, THOMAS GIRARDI, ELIZABETH TAYLOR,  
MAHIM KHAN, et al.

Respondents

AMENDED STATEMENT OF CLAIM

1. Introduction

1. The Applicant, Alkiviades Andrew David, appears Pro Se, as Ambassador-at-Large for Antigua & Barbuda. This Honourable Court has jurisdiction under the Civil Procedure Rules of Antigua & Barbuda. This is an amendment under Rule 20 CPR expanding the Defendant list and the Particulars of Damage.

2. The Parties

2. The Applicant is the founder of SwissX and Ambassador-at-Large for Antigua & Barbuda, engaged in sovereign carbon sequestration and biofuel projects.  
3. The Respondents include attorneys, media conglomerates, financial institutions and their CEOs, enforcers, and political defendants, as listed in Annex A (Schedule of Defendants).

3. Background Facts

4. The Applicant, in partnership with the Government of Antigua & Barbuda, the SwissX Sovereign Wealth Fund, and the Farmers Antigua Trust, developed the 28 million acre Coral & Seagrass Restoration Project. This project has an annual carbon sequestration capacity of approximately 17–19 million metric tons, valued at USD \$8 billion per annum (Carbon Core & FAT Report, Exhibit CC1).  
5. The project would render Antigua & Barbuda one of the first carbon-negative nations globally, with sovereign wealth generated through carbon credit monetization.  
6. Respondents, through defamatory campaigns, fraudulent litigation including the Alpha Nero case, and media suppression, obstructed this initiative causing catastrophic sovereign and private

losses.

#### 4. Fossil Fuel Motive and Conflicts of Interest

7. Many Respondents are directly tied to fossil fuel infrastructure through the banks and corporations they control. These banks (JP Morgan, Citibank, HSBC, UBS, Deutsche Bank, Prudential, ICICI, Wells Fargo, Bank of America) are leading financiers of oil, gas, and coal. Media entities (Paramount, Disney, Fox, Comcast, Sony, Vivendi, Warner) are historically funded through fossil-linked financing syndicates. Sipur Entertainment, controlled by Shari Redstone, receives capital linked to fossil fuel infrastructure.

8. These Defendants had a direct interest in obstructing Antigua's proof-of-concept as a sovereign, carbon-credit-driven economy.

#### 5. Causes of Action

9. Defamation: Publication of false and damaging statements globally.

10. Civil Conspiracy: Collusion between lawyers, banks, media entities, and political actors.

11. Tortious Interference: Disruption of sovereign agreements and carbon credit projects.

12. Fraud & Misrepresentation: False lawsuits and weaponized litigation.

13. Breach of Sovereign Economic Rights: Obstruction of Antigua's carbon-credit sovereignty.

#### 6. Particulars of Damage

14. Carbon Credit Losses: USD \$8 billion annually; USD \$80 billion per decade; USD \$400 billion over five decades. Losses caused by obstruction of the Antigua Carbon Registry.

15. Biofuel Production Losses: SwissX B100 biofuel production was delayed by three years due to defamation, causing lost revenues of USD \$1.5 billion over that period, with continuing opportunity losses.

16. Tourism & Investment: Reputational damage caused loss of multi-billion-dollar inflows.

17. Political Harm: Members of the UPP Executive knowingly colluded with foreign cartel actors to undermine sovereign projects for partisan gain.

#### 7. Relief Sought

18. Judgment against Respondents jointly and severally.

19. Damages in excess of USD \$80 billion, plus continuing annual accrual.

20. Declaratory relief affirming Antigua's right to carbon sovereignty.

21. Costs, interest, and such other relief as the Court deems just.

#### Annex A – Schedule of Defendants

The Respondents include:

Attorneys & Cartel Operators: Thomas Girardi / Girardi Keese; Gloria Allred; Lisa Bloom; Joseph Chora; Nathan Goldberg; Renee Mochkatel; Dolores Leal; Barry K. Rothman (deceased); Carole Lieberman; Louis Freeh; Robert Shapiro; Eric Wexler; Fred Heather; John Branca.

Plaintiffs in Fraudulent Claims: Elizabeth Taylor; Mahim Khan; Lauren Reeves; Chasity Jones; Marguerita Nichols (Jane Doe).

Judicial Machinery/Forums: LA Superior Court Judges (Michelle Williams, Terry Green, Christopher Lui, Rafael Ongkeko, Yolanda Orozco); California Court of Appeal, Second District; JAMS Arbitration.

Media Corporations: Shari Redstone / National Amusements; Paramount Global; CBS Interactive; Red Ventures; CNET; Disney; ABC; Vivid Entertainment; Warner Music Group; Vivendi; Universal Music Group; Sony Music; Sony Pictures; Fox Corp; News Corp; Comcast; NBCUniversal; Brian Roberts; Sipur Entertainment.

Financial Institutions & CEOs: Bank of America – Brian Moynihan; Wells Fargo – Charles Scharf; Deutsche Bank – Christian Sewing; Citibank – Jane Fraser; JPMorgan Chase – Jamie Dimon; HSBC – Noel Quinn; Credit Suisse – Ulrich Körner (former)/UBS – Sergio Ermotti; Prudential – Charles Lowrey; ICICI Prudential – Anup Bagchi.

Enforcers/Fixers: Anthony Pellicano.

Political Defendants (United Progressive Party): Harold Lovell; D. Gisele Isaac; Richard Lewis; Pearl Quinn-Williams; Franz deFreitas; Cleon Athill; all other members of the UPP Executive Committee.

Respectfully submitted,

Digitally signed by:

ALKIVIADES ANDREW DAVID

Pro Se, Ambassador-at-Large, Antigua & Barbuda

Applicant in Person

Date: September 24, 2025





Case Number :ANUHCV2025/0149



IN THE HIGH COURT OF JUSTICE  
ANTIGUA & BARBUDA

Submitted Date:24/09/2025 11:48

Filed Date:24/09/2025 11:49

Fees Paid:42.00

Case No: ANUHCV2025/0149

BETWEEN:

ALKIVIADES ANDREW DAVID

Applicant

and

GLORIA ALLRED, LISA BLOOM, THOMAS GIRARDI, ELIZABETH TAYLOR,  
MAHIM KHAN, et al.

Respondents

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Respectfully submitted,

Digitally signed by:

ALKIVIADES ANDREW DAVID

Pro Se, Ambassador-at-Large, Antigua & Barbuda

Applicant in Person

Date: September 24, 2025





# Certificate of service

On what day did you serve?	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
The date of service is	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Name of court	Claim No.
Name of Claimant	
Name of Defendant	

## What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

## On whom did you serve?

(If appropriate include their position e.g. partner, director).

## How did you serve the documents?

(please tick the appropriate box)

- ☐ by first class post or other service which provides for delivery on the next business day
- ☐ by delivering to or leaving at a permitted place
- ☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify)
- 
- ☐ by other means permitted by the court (please specify)
- 
- ☐ by Document Exchange
- ☐ by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)
- ☐ by other electronic means (.....time sent, where document is other than a claim form) (please specify)
- 

## Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

- Being the ☐ claimant's ☐ defendant's
- ☐ solicitor's ☐ litigation friend
- ☐ usual residence
- ☐ last known residence
- ☐ place of business
- ☐ principal place of business
- ☐ last known place of business
- ☐ last known principal place of business
- ☐ principal office of the partnership
- ☐ principal office of the corporation
- ☐ principal office of the company
- ☐ place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
- ☐ other (please specify)

I believe that the facts stated in this certificate are true.

Full name

Signed

Mark. Walsh

(Claimant) (Defendant) ('s solicitor) ('s litigation friend)

Position or office held

(If signing on behalf of firm or company)

Date

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### **Calculation of deemed day of service of a claim**

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

### **Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)**

<b>Method of service</b>	<b>Deemed day of service</b>
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Howard Kennedy Solicitors

1 London Bridge

London

SE1 9BG.



AJ Foundation

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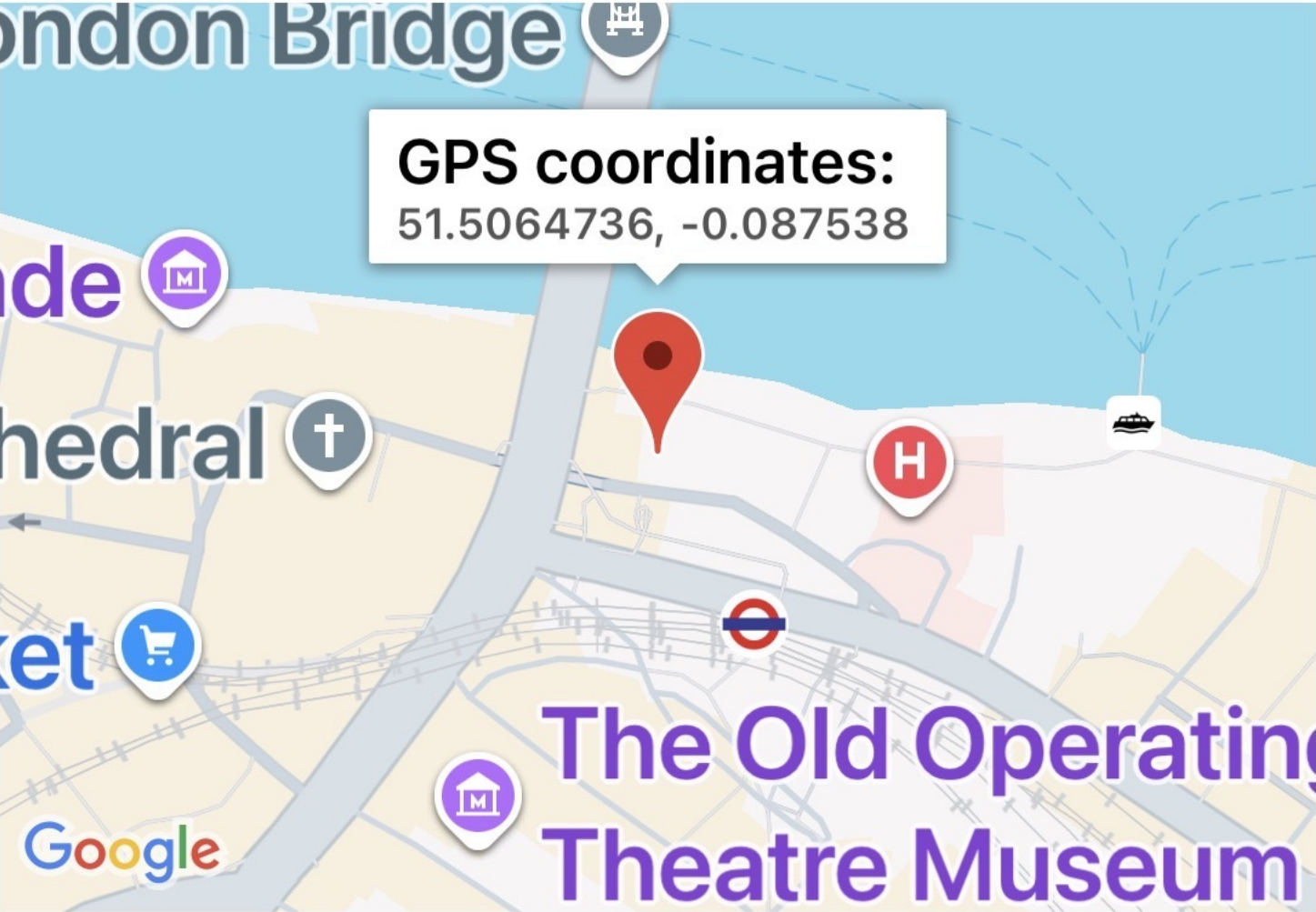




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