



**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

ALKIVIADES DAVID et al.,

Plaintiffs,

v.

COMCAST INC. et al.,

Defendants.

Case No. 4:23-cv-00435-SDJ

**NOTICE OF SUPPLEMENTAL AUTHORITY AND JURISDICTIONAL
SIGNIFICANCE OF ANTIGUA HIGH COURT ORDER, SERVICE RECORD, AND
FILED CARBON MARKET EXHIBIT**

Plaintiff Alkiviades David respectfully submits this Notice of Supplemental Authority and Jurisdictional Significance. Attached as **Exhibit A** is the Order of Justice Rene Williams of the High Court of Antigua and Barbuda, dated May 6, 2026, in Claim No. ANUHCV2025/0149. Attached as **Exhibit B** is the related Antigua service statement coordinated through Kent Legal UK. Attached as **Exhibit C** is the filed Antigua and Barbuda Carbon Compliance Market Act exhibit, submitted and filed in Claim No. ANUHCV2025/0149 on October 14, 2025.

I. Why the Antigua Order Matters

The Antigua High Court stayed the proceedings on forum non conveniens grounds, finding that Antigua and Barbuda is not the natural forum and that the United States has the substantially stronger connection to the pleaded controversy. The Court expressly recognized the dispute's ties to U.S.-based lawyers, media corporations, financial institutions, litigation

records, witnesses, publication records, corporate records, and alleged conduct.

That finding is directly relevant because this Court already has the Comcast action pending before it. The Order does not transfer or decide this case; it supplies supplemental authority and a foreign-court forum analysis confirming that the center of gravity of the pleaded dispute is in the United States.

II. Comcast, NBCUniversal, CBS Interactive, and CNET Are Expressly Identified

The Williams Order records that Comcast and NBCUniversal were included among the media-corporate defendants in the amended Antiguan pleading. The service materials further identify Comcast/NBCUniversal, Brian L. Roberts, CBS Interactive, and CNET, with corporate service directed through registered-agent channels and corporate headquarters.

Comcast is therefore not incidental. It is named in this action, identified in the Antigua record, and tied to the U.S. media, telecommunications, distribution, file-sharing, and data-infrastructure issues now before the Court.

III. Overlap With Legal Actors and U.S. Evidence

The Order and service record also identify David Boies, Gloria Allred, Michael Avenatti, Tom Girardi, Black Cube, Joseph Chora, Chasity Jones, and related actors. These names overlap with the Dallas Comcast case, the Mark Lieberman filings, the Dr. Cracks / Dallas evidence, and the broader U.S.-centered litigation and media network already referenced in the record.

This overlap supports the conclusion that the Eastern District of Texas is not a remote or artificial forum. It is a central U.S. forum already seized of the Comcast case and positioned to manage preservation, discovery, and case coordination concerning overlapping U.S. defendants, records, witnesses, and conduct.

IV. Service Coordination and Dual Notice

Service was coordinated through Kent Legal UK with process server Martin Wilson. Plaintiff also effected local service on United Progressive Party members in Antigua and publicly discussed the matter through radio and television broadcasts. Those facts establish local notice and local impact in Antigua, while the Williams Order simultaneously confirms that the substantive center of gravity remains in the United States.

This creates a dual showing: Antigua had sufficient public and procedural notice to generate a real factual record, but the claims, records, witnesses, corporate actors, and alleged conduct point toward U.S. adjudication and centralized management in this Court.

V. The Antigua Court Did Not Reach the Merits

The stay was granted on forum grounds. The Court expressly declined to determine finally whether the amended claim disclosed a reasonable cause of action and made no findings adjudicating truth, liability, or damages. The Order is therefore a jurisdictional roadmap, not a merits defeat.

VI. Texas-Specific Jurisdictional Nexus

This Court is not merely a convenient federal forum. The Eastern District of Texas is the pending forum already seized of the Comcast action, and the Texas nexus is reflected in the record through overlapping witnesses, events, records, and business contacts connected to the pleaded controversy.

The Dallas record includes the Mark Lieberman connection, the Dr. Cracks / Dallas evidence, Comcast-related media and distribution issues, and overlapping actors also identified in the Antigua record. When combined with this Court's existing Comcast docket and the Texas-specific factual record already before the Court, the Eastern District of Texas has the strongest practical basis to manage jurisdiction, preservation, discovery, and coordinated adjudication.

VII. Liability Gravity Field and Sovereign Natural-Capital Use

Plaintiff further submits that the record describes a large concentration of potential liability across interconnected media, legal, technology, financial, and distribution actors. Plaintiff refers to this concentration as a liability gravity field: the aggregation of related actors, records, claims, damages theories, and preservation duties that, if lawfully established, could materially affect the scale, value, and settlement posture of this litigation.

Plaintiff does not ask the Court to value unproven claims at this stage. Rather, Plaintiff explains that the purpose of preserving and adjudicating this liability field is to convert any judicially established accountability, recovery, or settlement value into productive sovereign natural-capital investment. Plaintiff intends to use lawfully established proceeds, rights, and recoveries to support the SwissX / FAT.ag natural-capital framework, including carbon-credit underwriting, sargassum remediation, soil restoration, biochar and SoilBooster production, farmer ownership, youth green-business creation, and Antigua and Barbuda community benefit.

The sovereign assets referenced by Plaintiff are intended to underwrite carbon-credit and natural-capital value through Antigua-based land, sargassum conversion, soil-carbon enhancement, seagrass and coral restoration concepts, verified environmental outputs, and farmer/community participation. Plaintiff submits that this intended use reinforces the public-interest need for preservation, transparent case management, and avoidance of fragmented proceedings.

VIII. Filed Carbon Market Exhibit and Sovereign Asset Framework

Exhibit C provides the filed carbon-market framework that underlies Plaintiff's sovereign-natural-capital explanation. The exhibit identifies the proposed Antigua and Barbuda Carbon Compliance Market Act (2025), describes a framework for the generation, verification, registration, and trading of carbon credits, and aligns the national carbon market concept with Article 6 of the Paris Agreement.

The filed exhibit further describes eligible projects including blue-carbon restoration, biochar, regenerative agriculture, renewable energy, and waste-to-energy initiatives. It also recognizes digital issuance of carbon credits on blockchain systems, benefit-sharing concepts, and an explanatory memorandum describing economic resilience, climate adaptation, local community empowerment, carbon revenue-sharing, and sustainable job creation.

Plaintiff includes Exhibit C not to ask this Court to enact or approve any carbon regime, but to show the Court the sovereign-asset and natural-capital context behind the requested preservation and case-management relief. The liability field is intended to be directed toward restoration, underwriting, and community wealth creation if, and only if, liability or recovery is lawfully established.

IX. Why the Eastern District of Texas Is the Proper Forum

The Williams Order, service record, and filed carbon-market exhibit support this Court's jurisdictional and case-management authority because:

1. the pleaded controversy has a clear United States center of gravity;
 2. Comcast, NBCUniversal, CBS Interactive, and CNET are expressly identified in the related foreign record;
 3. relevant records, witnesses, corporate records, publication records, and evidence are located in the United States;
 4. the claims concern U.S. legal proceedings and U.S. corporate conduct;
 5. the Antigua record overlaps with the Dallas Comcast case, including Chora, Chasity Jones, Mark Lieberman, and Dr. Cracks / Dallas evidence;
 6. the filed carbon-market exhibit supplies context for the sovereign-natural-capital value Plaintiff seeks to protect and restore;
 7. fragmentation and inconsistent rulings are avoided through centralized U.S. management;
- and

8. Antigua has deferred to the more connected forum rather than deciding the merits.

X. Requested Relief

Plaintiff respectfully requests that the Court:

1. accept the Williams Order (Exhibit A), service statement (Exhibit B), and filed carbon-market exhibit (Exhibit C) as supplemental materials;
2. consider the exhibits in support of jurisdiction and case-management authority;
3. recognize that the Antigua Court identified the United States as the forum with the stronger connection;
4. preserve and require production of relevant Comcast, NBCUniversal, CBS Interactive, CNET, Download.com, media-distribution, file-sharing, litigation, and corporate records;
5. grant leave to file a corrected pleading or supplemental jurisdictional statement; and
6. grant such further relief as the Court deems just and proper.

XI. Conclusion

The Williams Order and service record provide a clear jurisdictional roadmap. They do not reject the claims on the merits. Instead, they confirm that the center of gravity lies in the United States, where the defendants, witnesses, records, media infrastructure, and alleged conduct are located. Exhibit C supplies the filed sovereign-natural-capital framework that explains Plaintiff's intended public-interest use of any lawfully established recovery. Because Comcast is already before this Court and the pleaded network overlaps directly, these materials strongly support centralized case management in the Eastern District of Texas.

Respectfully submitted,

/s/ Alkiviades David

Alkiviades David

Plaintiff

Grays Hill, Saint John Parish
Antigua and Barbuda
June 30, 2026

CERTIFICATE OF SERVICE

I certify that on June 30, 2026, I caused this Notice and its exhibits to be filed through the Court's electronic filing system and/or served on all parties and counsel of record by the means available to Plaintiff.

/s/ Alkiviades David
Alkiviades David

EXHIBIT A

High Court of Antigua and Barbuda Order of Justice Rene Williams
Claim No. ANUHCV2025/0149

**THE EASTERN CARIBBEAN SUPREME COURT
ANTIGUA AND BARBUDA**

IN THE HIGH COURT OF JUSTICE

CLAIM NO.: ANUHCV2025/0149

BETWEEN:

ALKIVIADES DAVID

Claimant

And

[1] DAVID BOIES
[2] GLORIA ALLRED
[3] DANI PERETZ
[4] SHARI REDSTONE
[5] DAPHNE BARAK
[6] MICHAEL AVENATTI
[7] TOM GIRARDI
[8] BLACK CUBE LTD
[9] LIMEWIRE NFT HOLDINGS
[10] EDGAR BRONFMAN
[11] JOHN BRANCA
[12] JOHN MCCLAIN
[13] DOES 1-100

Defendants

**THE ATTORNEY GENERAL OF ANTIGUA AND
BARBUDA**

Amicus Curiae

Appearances:

The Claimant in person

Carla Brookes-Harris Deputy Solicitor General and Zachary Phillips- amicus curiae

2026: January 16th;
May 6th.

Ruling on Forum Non-Conveniens

[1] **WILLIAMS, J.:** This is the Court's decision on threshold issues identified by the Court's order dated 29th October 2025. By that order, the Court directed the Claimant and the Honourable Attorney General, appearing as amicus curiae, to file submissions on two matters, namely:

1. Whether the Court has jurisdiction in 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 Antigua and Barbuda; and
2. Whether the allegations contained in the claim disclose any reasonable cause of action in accordance with the laws of Antigua and Barbuda against the defendants.

[2] The same order further provided that the Claimant was barred from filing any other documents in the matter except the written submissions required by the order, without leave of the Court. The matter was adjourned to 16th January 2026 for hearing when both parties made further oral submissions.

[3] The claim, both as originally filed and as amended, is sprawling in conception, diffuse in form and directed against a large body of foreign persons and entities. The claim is also made in respect of allegations which, on their face, are predominantly concerned with conduct which is alleged to have occurred outside Antigua and Barbuda.

Procedural history

[4] There have been numerous filings in this matter on the part of the Claimant. Most of these documents are extensive and contain material which is not necessary to consider for present purposes. The relevant procedural history is as follows:

1. The claim was filed on 17th April 2025.

2. An Amended Statement of Claim was filed on 24th September 2025.
3. No Acknowledgment of Service or Defence has been filed by any Defendants to the Claim, although there appears to be proof of service of the claim on at least some Defendants.
4. At a hearing on 29th October 2025, the Court acting on its own initiative sought the assistance of the Claimant and the Honourable Attorney General in relation to the issues identified at paragraph 2 above.
5. The Honourable Attorney General filed written submissions with authorities on 15th December 2025 and the Claimant filed additional material on 2nd February 2026.

The Pleadings

- [5] The Claim Form and Statement of Claim as originally filed on 17th April 2025, describes the Claimant as 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. The Claimant appears Pro Se.
- [6] Defendants Nos. 1-12 are all individuals and two corporate entities who all seem to reside outside Antigua and Barbuda as mentioned in the Claim Form itself. For example, the First Defendant David Boies, is the founding partner of the firm of Boies Schiller Flexner LLP headquartered in New York City, the Second Defendant Gloria Allred, is also a prominent lawyer who practises in the United States of America whilst the Fourth Defendant Shari Redstone, is a media executive associated with Paramount Holdings.
- [7] Only the Eleventh and Thirteenth Defendants have any direct connection with Antigua and Barbuda. In this regard, the Eleventh Defendant, John Branca is

described as having residence in Antigua, namely on Jumby Bay Island. The Thirteenth Defendant is named as The Executive Members of the United Progressive Party (UPP) although the members are not individually named.

[8] The corporate entities are the Eighth Defendant Black Cube Ltd. who is described as an Israeli-owned private intelligence agency based in London and Tel Aviv, Israel. The Ninth Defendant is Limewire NFT Holdings which the Claimant describes as having assets and servers in the Caribbean.

[9] On 24th September 2025, the Claimant filed an Amended Claim Form and Statement of Claim. According to the said documents, the amendment was made under Part 20 of the Civil Procedure Rules to expand the Defendant list and the Particulars of Damage. This amended statement of case names an extraordinary range of persons and entities in a Schedule. The Schedule is as follows:

1. **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.
2. **Plaintiffs in Fraudulent Claims:** Elizabeth Taylor; Mahim Khan; Lauren Reeves; Chasity Jones; Marguerita Nichols (Jane Doe).
3. **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.
4. **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.
5. **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 Korner (former)/UBS - Sergio Ermotti; Prudential — Charles Lowrey; ICICI Prudential - Anup Bagchi.
6. **Enforcers/Fixers:** Anthony Pellicano.

7. **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.

[10] The causes of action are pleaded at paragraph 5 of the Statement of Claim as follows:

“Defamation: Publication of false and damaging statements globally.
Civil Conspiracy: Collusion between lawyers, banks, media entities, and political actors.
Tortious Interference: Disruption of sovereign agreements and carbon credit projects.
Fraud & Misrepresentation: False lawsuits and weaponized litigation.
Breach of Sovereign Economic Rights: Obstruction of Antigua’s carbon-credit sovereignty.”

[11] At paragraphs 4 to 6 of the Statement of Claim the facts upon which the Claimant relies are pleaded as follows:

- “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.”

[12] At paragraphs 7 and 8 of the Amended Statement of Claim, the Claimant further outlines the Defendants’ alleged actions by stating:

- “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, and 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.”

[13] The particulars of loss are pleaded at paragraphs 14 to 17 of the Amended Statement of Claim as follows:

“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.”

[14] Although the Amended Statement of Claim is very brief, the Claimant has filed a large number of further documents, including re-issued written submissions, letters, notices of factual clarification and other material. However, the Claimant has not made it clear how these materials are referenced in the Amended Statement of Claim.

Issues

[15] The issues for determination are as follows:

1. Whether Antigua and Barbuda is the proper or appropriate forum for the trial of this action; and
2. Whether the amended statement of claim discloses any reasonable cause of action known to the law of Antigua and Barbuda.

Discussion

Forum Non Conveniens

- [16] As outlined above, the majority of Defendants are resident outside of Antigua and Barbuda and have taken no part in the proceedings. Thus, the Court is concerned as to whether Antigua and Barbuda is the appropriate forum to hear this matter. The Court is empowered by **Rule 26.2** of the **Civil Procedure Rules (Revised Edition) 2023** to make orders of its own initiative provided that the parties are given an opportunity to make representations before the court does so. In the absence of any participation by the Defendants, the Court therefore invited the Honourable Attorney General to make submissions on the issues identified above.
- [17] The fact that a party resides outside the State does not automatically mean that the Court does not have jurisdiction. In this regard, **CPR Rule 7.3(4)** may be applicable since the Amended Statement of Claim refers primarily to torts allegedly committed by the Defendants. This rule provides as follows:
- “(4) Court process may be served out of the jurisdiction if a claim in tort is made and the act causing the damage was committed within the jurisdiction or the damage was sustained within the jurisdiction.”
- [18] Even assuming without deciding, that the Claimant can bring himself within **CPR Rule 7.3(4)** on the basis that some damage is alleged to have been sustained within Antigua and Barbuda that does not answer the distinct question of whether this jurisdiction is the proper or appropriate forum for the trial of the action. This requires consideration of the doctrine of forum non conveniens.
- [19] Forum non conveniens is a common law doctrine by which a court may stay proceedings because another court, in another jurisdiction, is clearly the more appropriate place for the dispute to be tried. The leading authority on this doctrine

is the House of Lords decision in **Spiliada Maritime Corporation v. Cansulex Ltd.**¹ where Lord Goff stated:

“The basic principle is that a stay will only be granted on the ground of forum non conveniens where the court is satisfied that there is some other available forum, having competent jurisdiction, which is the appropriate forum for the trial of the action, i.e. in which the case may be tried more suitably for the interests of all the parties and the ends of justice.”

[20] In **IPOC International Growth Fund Ltd. v. LV Finance Group Ltd.**² Gordon JA giving the judgment of the Court of Appeal outlined the relevant principles from **Spiliada v. Cansulex** as follows:

“(i) The starting point, or basic principle, is that a stay on the grounds of forum non conveniens will only be granted where the court is satisfied that there is some other available forum, having competent jurisdiction, which is the appropriate forum for the trial of the action. In this context, appropriate means more suitable for the interests of all of the parties and the ends of justice.

(ii) The burden of proof is on the defendant who seeks the stay to persuade the court to exercise its discretion in favour of a stay. Once the defendant has discharged that burden, the burden shifts to the claimant to show any special circumstances by reason of which justice requires that the trial should nevertheless take place in this jurisdiction. Lord Goff opined that there was no presumption, or extra weight in the balance, in favour of a claimant where the claimant has founded jurisdiction as of right in this jurisdiction, save that “where there can be pointers to a number of different jurisdictions” there is no reason why a court of this jurisdiction should not refuse a stay. In other words, the burden on the defendant is two-fold: firstly, to show that there is an alternate available jurisdiction, and, secondly, to show that that alternate jurisdiction is clearly or distinctly more appropriate than this jurisdiction.

(iii) When considering whether to grant a stay or not, the court will look to what is the “natural forum” as was described by Lord Keith of Kinkel in **The Abidin Daver**,³ “that with which the action has the most real and substantial connection”. In this connection the court will be mindful of the availability of witnesses, the likely languages that they speak, the law governing the transactions or to which the fructification of the transactions might be

¹ [1986] 3 All ER 843 at 854

² Civil Appeal No 20. of 2003 decided 19th September 2005 at paragraph 27 (unreported)

³[1984] A.C. 398

subject, in the case of actions in tort where it is alleged that the tort took place and the places where the parties reside and carry on business. The list of factors is by no means meant to be exhaustive but rather indicative of the kinds of considerations a court should have in exercising its discretion.

(iv) If the court determines that there is some other available and prima facie more appropriate forum then ordinarily a stay will be granted unless there are circumstances by reason of which justice requires that a stay should nevertheless not be granted. Such a circumstance might be that the claimant will not obtain justice in the appropriate forum. Lord Diplock in the **Abidin Daver** made it very clear that the burden of proof to establish such a circumstance was on the claimant and that cogent and objective evidence is a requirement.”

[21] In the usual case, a defendant applies for a stay and bears the burden of demonstrating that another available forum. However, this case arises in an unusual circumstance in that no defendant has appeared. The Court, acting on its own initiative pursuant to **CPR Rule 26.2** and having given the Claimant an opportunity to be heard, is required to consider whether the proceedings should continue where the pleadings themselves disclose an overwhelmingly foreign controversy. In that context, the Court is not reversing the Spiliada burden but is asking whether the available material establishes that Antigua and Barbuda is the natural forum.

[22] In their amicus submissions, the Attorney General’s Chambers identified factors which demonstrate that Antigua and Barbuda is not the appropriate forum for hearing this claim. These are as follows:

1. The fact that most of the Defendants reside out of the jurisdiction.
2. The claims do not appear to be governed by Antigua and Barbuda law.
3. There is no factual connection between the allegations underlying the claim and the jurisdiction of Antigua and Barbuda.
4. The cost and challenges of conducting proceedings in this jurisdiction, due to the Defendants and possible witnesses being both based overseas.

- [23] These must of course be weighed against the fact that the Claimant resides in Antigua and Barbuda and appears to be engaged in business within the jurisdiction. As previously mentioned, the claim also alleges significant losses which have been suffered in Antigua and Barbuda. Another relevant factor is that the executive members of the United Progressive Party (UPP) who are also named Defendants reside in Antigua and Barbuda.
- [24] The narrow question is therefore whether this claim has a real and substantial connection with Antigua and Barbuda. The claim is directed largely to foreign lawyers, media organisations, financial institutions, business figures, and concerns alleged conduct occurring chiefly outside Antigua and Barbuda. The pleaded acts are said to include defamatory publications, fraudulent litigation, media suppression, banking obstruction and an international campaign by foreign actors. The material witnesses and documents would therefore, on the Claimant's own pleaded case, be predominantly foreign.
- [25] The Claimant relies on asserted local harm and local political connections. Those are relevant but not decisive. In this case the allegation is that the local Defendants have conspired with the foreign-based Defendants to cause loss. However, as outlined at paragraphs 7 and 8 of the Amended Statement of Claim, the main actors seem to be the foreign defendants.
- [26] The Claimant's own materials identify related proceedings in California and the United Kingdom arising out of substantially overlapping subject matter. Those proceedings point away from this jurisdiction and raise obvious risks of duplication, fragmentation, inconsistent decisions and procedural disorder if this Court were to entertain the claim.
- [27] The United States of America appears, on the Claimant's own pleaded case, to be one of the jurisdictions with the closest connection to the substantial controversy. A significant number of the named defendants are United States lawyers, media

personalities, financial institutions, entertainment executives or entities. The pleadings and the additional material filed by the Claimant refers to litigation in California, media activity involving United States entities, and alleged conduct by United States-based attorneys and corporations. Those matters are not incidental. They form the central basis of the claim.

[28] If the Claimant's case is that he was injured by defamatory publication, fraudulent litigation, media suppression, banking obstruction or a coordinated campaign involving American lawyers, courts, media corporations and financial institutions, the United States is plainly a forum with a real and substantial connection to the dispute. The relevant witnesses, litigation documents, corporate and publication records are likely to be located there. The courts of the United States are also better placed to determine questions arising from alleged abuse of United States legal proceedings, alleged misconduct by United States attorneys, and alleged publications or corporate conduct occurring in that jurisdiction.

[29] This is particularly important because a court trying this claim would be required to examine not merely the consequences of the alleged conduct, but the conduct itself. The place where the alleged damage is said to have been felt is relevant, but it is not determinative. In a claim of this nature, the Court must consider where the alleged wrongful acts occurred, where the defendants reside or carry on business, where the evidence is located, what law is likely to govern the alleged wrongs, and which court can most efficiently and fairly adjudicate the controversy. On those connecting factors, the United States has a substantially stronger connection than Antigua and Barbuda.

[30] The United Kingdom may also be a more appropriate forum for at least part of the controversy pleaded by the Claimant. The Eighth Defendant, Black Cube Ltd, is pleaded as being based in London and Tel Aviv. The Claimant's own case therefore connects part of the alleged intelligence, investigative or reputational campaign to the United Kingdom. To the extent that the allegations concern conduct undertaken

by, through, or from entities based in London, the English courts would be better placed to adjudicate the lawfulness of that conduct, compel relevant evidence, and resolve any issues concerning English law.

Why Antigua and Barbuda is not the natural forum

- [31] The Claimant relies on his residence in Antigua and Barbuda, the asserted presence of some business activity here, alleged damage to Antigua-based projects and the inclusion of members of the United Progressive Party as defendants. Those are matters which the Court has considered. However, they do not outweigh the foreign centre of gravity of the pleaded claim. The Amended Statement of Claim does not identify with sufficient clarity any specific act done in Antigua and Barbuda by any specific defendant which could sensibly make this jurisdiction the natural forum for the trial of the action. Nor does it plead a coherent factual basis showing that the alleged foreign defendants actionable conduct into Antigua and Barbuda in a way which would make this Court the most suitable court to try the claim.

Fragmentation

- [32] There is also a serious risk of fragmentation and procedural unfairness if the claim proceeds in this jurisdiction. The Court would be required to adjudicate allegations against a large number of foreign defendants, many of whom appear to have no demonstrated presence in Antigua and Barbuda. The practical difficulties of service, participation, disclosure, witness attendance and enforcement would be considerable. The trial would likely require examination of foreign legal proceedings, foreign professional conduct, foreign corporate records and foreign publications. Those are matters more appropriately managed by courts in the jurisdictions where the defendants, records and events are located.
- [33] Further, the existence of related proceedings in California and the United Kingdom points strongly away from Antigua and Barbuda as the natural forum. If this Court were to entertain the present claim, there would be a real risk of duplicative proceedings, inconsistent factual findings, overlapping determinations and

procedural disorder. The Court identified these concerns on both occasions when this matter came on for hearing. The doctrine of forum non conveniens exists to avoid precisely that kind of fragmentation where another available forum is clearly more appropriate.

- [34] Accordingly, it appears that these proceedings could be more conveniently brought in the United States of America or the United Kingdom where the majority of Defendants reside and carry on business. No sufficient basis has been shown for concluding that justice cannot be obtained in these more closely connected jurisdictions. Antigua and Barbuda is therefore not the proper or appropriate forum, and the proceedings should be stayed on the ground of forum non conveniens.

Reasonable Cause of Action

- [35] Accordingly, it is unnecessary to determine finally the second issue identified by the order of 29th October 2025, namely whether the allegations disclose any reasonable cause of action in accordance with the laws of Antigua and Barbuda. However, it must be observed that the Amended Statement of Claim does not comply with **CPR Rule 8.7(1)**, in that it does not set out the facts upon which the Claimant relies.

- [36] It is not enough to attach a legal label to a grievance. To assert “defamation”, “conspiracy”, “fraud”, or “interference” is not to plead those causes of action. The pleading must contain the constituent material facts necessary to support them. An example of this is the defamation pleading which fails to set out the alleged defamatory words, and also does not outline the defamatory meaning which should be assigned to the said words. The conspiracy pleaded also fails to specify how the Defendants conspired with each other or with other persons to harm the Claimant’s interests.

- [37] Furthermore, the Amended Statement of Claim alleges loss of carbon credits and loss of tourism investment. However, it seems that these alleged losses have been

suffered by the Government of Antigua and Barbuda and not the Claimant. Accordingly, even if the claim were not stayed on grounds of forum non conveniens, the Amended Statement of Claim could still have been struck out as disclosing no reasonable grounds for bringing the claim.

Order

[38] Accordingly, it is ordered that:

1. The instant proceedings are stayed on the basis that Antigua and Barbuda is not the proper or appropriate forum for the trial of the claim.
2. Service of the Claim Form and Statement of Claim is set aside.
3. The Claimant is prohibited, without leave of the Court, from filing any further documents in these stayed proceedings, save for any application for leave to appeal or any document strictly required for the prosecution of such application.
4. There shall be no order as to costs.
5. The Claimant shall have carriage of this order.

Rene Williams
High Court Judge



By The Court

Deputy Registrar

EXHIBIT B

Antigua Service Statement / Service List Coordinated Through Kent Legal UK

High Court of Justice – Antigua and Barbuda

Case No: ANUHCV2025/0149

BETWEEN :-

Alkiviades David

Claimant

-and-

Attorneys & Cartel Operators

1. Lisa Bloom
2. Joseph Chora
3. Nathan Goldberg
4. Renee Mochkatel
5. Dolores Leal
6. Carole Lieberman
7. Louis Freeh
8. Robert Shapiro
9. Eric Wexler
10. Fred Heather

Plaintiffs Identified in Fraudulent / Coordinated Claims

1. Elizabeth Taylor
2. Mahim Khan
3. Lauren Reeves
4. Chasity Jones
5. Marguerita Nichols (Jane Doe)

Judicial Machinery / Forums (Service via Clerk of Court)
Los Angeles Superior Court Judges

- Michelle Williams
- Terry Green

- Christopher Lui
- Rafael Ongkeko
- Yolanda Orozco
- Thomas Falls

California Court of Appeal – Second District

- Elwood Lui (Presiding Justice, retired)

Media Corporations & Executives

- Paramount Global
Office of the CEO: George Cheeks / Brian Robbins / Chris McCarthy
- CBS Interactive
Jim Lanzone
- Red Ventures
- CNET
- Disney
- ABC
- Vivid Entertainment
- Warner Music Group
- Vivendi
- Universal Music Group
- Sony Music
- Sony Pictures
Ravi Ahuja
- Fox Corporation
Lachlan Murdoch
- News Corp
- Comcast
Brian L. Roberts
- NBCUniversal
- Sipur Entertainment (Israel)

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 (now UBS) – Sérgio Ermotti / Ulrich Körner (former)
- Prudential – Charles Lowrey
- ICICI Prudential – Anup Bagchi

Enforcers / Fixers

- Anthony Pellicano (Los Angeles)

STATEMENT of SERVICE

I, Martin Wilson, Process Server are currently employed in this matter to effect service by Kent Legal UK, my place of work is at 8th St, Los Angeles, CA 90014, USA I will say as follows.

1. I am of over 18 years of age.
2. I am authorised to make this Affidavit on behalf of the Claimant in this action.
3. I make this Affidavit from my own knowledge except where stated otherwise.
4. I make this affidavit in support of the personal service of proceedings upon the Defendants listed in EXH A attached
5. The following documents:
 - (i) LAWSUIT Authorization codes.pdf
 - (ii) LAWSUIT Cover page and Docs_Alkiviades David.pdf
 - (iii) LAWSUIT mage_evidence_Alkiviades David.pdf
 - (iv) LAWSUIT Claim Form (6).pdf

- (v) LAWSUIT Further Exhibits.pdf
- (vi) Particulars of Claim QR Code (incorporating exhibits).

6. I believe that service has been duly affected in accordance with the procedural rules and applicable international treaties/laws.

Statement of Truth

I believe that the facts stated in this Affidavit are true. I understand 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.

I am duly authorised by the Claimant to sign this Statement of Truth.

Name and position:

Signed: *Martin Wilson*

Dated: 01st November 2025

Place: New York



Exhibit A - Service Addresses:

1) ATTORNEYS & RELATED OPERATORS — Service Addresses (firm / employer)

- **Lisa Bloom**
The Bloom Firm, P.C.
Address: 20700 Ventura Blvd., Suite 301, Woodland Hills, CA 91364
- **Joseph Chora**
Chora Young LLP (or counsel of record)
Address: 650 Sierra Madre Villa Ave., Suite 304, Pasadena, CA 91107
- **Nathan Goldberg**
(Serve via counsel / firm — if representing Allred matters serve Allred firm)
Suggested service: **Allred, Maroko & Goldberg / Gloria Allred related office**
Address: 6300 Wilshire Blvd., Suite 1500, Los Angeles, CA 90048
- **Renee Mochkatel**
(Serve via counsel/firm)
Suggested service: Rust, Armenis & Schwartz (or counsel of record)
Address: 15760 Ventura Blvd., Suite 700, Encino, CA 91436
- **Dolores Leal**
The Law Offices of Dolores Leal (or counsel of record)
Address: 611 West 6th St., Suite 1675, Los Angeles, CA 90017
- **Dr. Carole Lieberman (psychiatry)**
Professional office (serve via practice or via counsel)
Address: 435 North Bedford Drive, Suite 406, Beverly Hills, CA 90210
- **Louis Freeh**
Freeh Sporkin & Sullivan LLP (or Freeh Group addresses)
Address: 1055 Thomas Jefferson St NW, Suite 204, Washington, DC 20007
- **Robert Shapiro**
Glaser Weil LLP (or counsel of record)
Address: 10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067
- **Dr. Eric Wexler (psychiatry / UCLA-affiliated)**
Serve via UCLA Health Risk Management / legal counsel for service.
Address for service: UCLA Health Risk Management, 10920 Wilshire Blvd., Suite 700, Los Angeles, CA 90024
(Alternatively: serve via UCLA Health legal counsel / Office of General Counsel at UCLA)

- **Fred Heather**
(If counsel at Gibson Dunn or related firm): Gibson, Dunn & Crutcher LLP
Address: 3161 Michelson Drive, Irvine, CA 92612
- **Anthony Pellicano** (enforcer/fixer)
Serve via known business / counsel address (public):
Address: 9601 Wilshire Blvd., Suite 1200, Beverly Hills, CA 90210
(If represented, serve the attorney of record.)

2) PLAINTIFFS (serve via their counsel / attorney of record; if unknown, serve via Clerk)

- **Elizabeth Taylor** — Serve via counsel of record; if represented by Gloria Allred / firm:
Address: Allred, Maroko & Goldberg (or counsel of record) — 6300 Wilshire Blvd., Suite 1500, Los Angeles, CA 90048
- **Mahim Khan** — Serve via counsel (e.g., The Bloom Firm if represented):
Address: The Bloom Firm, P.C., 20700 Ventura Blvd., Suite 301, Woodland Hills, CA 91364
- **Lauren Reeves** — Serve via counsel of record (e.g., The Bloom Firm): same as above
- **Chasity Jones** — Serve via counsel of record (e.g., Chora Young LLP): 650 Sierra Madre Villa Ave., Suite 304, Pasadena, CA 91107
- **Marguerita Nichols (Jane Doe)** — If counsel of record (Tom Girardi previously represented), serve via counsel; otherwise:
Clerk of Court (LA Superior Court) — service via court clerk (address below)

If plaintiff counsel is not listed or is in dispute, effect service through the Clerk of the Court handling the action (see Court addresses section).

3) JUDICIAL MACHINERY / FORUMS — Service via Clerk of Court

Los Angeles Superior Court (Clerk for service on matters within LA Superior)
Stanley Mosk Courthouse
111 North Hill Street
Los Angeles, CA 90012

California Court of Appeal — Second District (Clerk for service)
300 South Spring Street
Los Angeles, CA 90013

Note: Judges (Michelle Williams, Terry Green, Christopher Lui, Rafael Ongkeko, Yolanda Orozco, Thomas Falls, Elwood Lui) are NOT personally served; filings and any service are routed through the court clerk and proper court processes.

4) MEDIA CORPORATIONS & EXECUTIVES — Registered Agent / Corporate Service (U.S.)

For corporations, the safe method is service on the **Registered Agent (RA)** in the state of incorporation or via CT/CSC as the corporate RA where applicable.

- **Paramount Global**
Registered Agent: CSC – Corporation Service Company (or state-specific RA)
Suggested RA address (CA/NY filings): 2710 Gateway Oaks Dr., Suite 150N, Sacramento, CA 95833
(Also service at Paramount Global HQ for business address: 555 Fifth Avenue, New York, NY 10017)
- **CBS Interactive / CNET**
Registered Agent: CT Corporation System
RA address: 330 N. Brand Blvd., Suite 700, Glendale, CA 91203
(Corporate HQ: 51 W. 52nd St., New York, NY 10019 — use RA for formal service.)
- **Red Ventures**
Registered Agent: CT Corporation System (or local RA)
RA address: 330 N. Brand Blvd., Suite 700, Glendale, CA 91203 (use RA service)
- **CNET** (see CBS Interactive above)
- **Disney / ABC**
Registered Agent: CT Corporation System
RA address: 818 W. 7th St., Suite 930, Los Angeles, CA 90017
- **Vivid Entertainment**
Serve at corporate office: 3599 Cahuenga Blvd. West, Suite 400, Los Angeles, CA 90068
- **Warner Music Group / Universal Music Group / Sony Music**
Registered Agent: CT Corporation System (use RA)
RA address: 330 N. Brand Blvd., Suite 700, Glendale, CA 91203
- **Vivendi** (U.S. registered presence) — service via registered agent or corporate counsel (use local RA)
- **Fox Corporation**
Registered Agent: CSC – Corporation Service Company
RA address: 2710 Gateway Oaks Dr., Suite 150N, Sacramento, CA 95833
- **News Corp**
Registered Agent: CSC or CT Corporation (use RA for the state of service)
- **Comcast / NBCUniversal**
Registered Agent: CT Corporation System
RA address: 818 W. 7th St., Suite 930, Los Angeles, CA 90017
- **Brian L. Roberts (Comcast)** — Serve corporate matters via Comcast’s registered agent above or Comcast Corp HQ: Comcast Center, 1701 John F Kennedy Blvd, Philadelphia, PA 19103

- **Sipur Entertainment (Israel)** — Serve via corporate HQ/registered foreign agent; use international service via Hague Convention or local Israeli agent (use counsel to effect service)
- **Sony Pictures Entertainment** (Ravi Ahuja office) — service via RA (CT Corp): 330 N. Brand Blvd., Suite 700, Glendale, CA 91203 (or Sony Pictures HQ: 10202 Washington Blvd., Culver City, CA 90232)

5) FINANCIAL INSTITUTIONS — HQ (service via Registered Agent / Corp Counsel acceptable)

- **Bank of America** (Brian Moynihan) — Bank of America Corporate Center, 100 N. Tryon St., Charlotte, NC 28255 (or service via Bank of America Corporation Registered Agent in relevant jurisdiction)
- **Wells Fargo** (Charles Scharf) — Wells Fargo HQ, 420 Montgomery St., San Francisco, CA 94104
- **Deutsche Bank** (Christian Sewing) — Deutsche Bank AG US offices: 1 Columbus Circle, New York, NY 10019 (use RA / counsel as appropriate)
- **Citibank** (Jane Fraser) — Citigroup Center, 399 Park Ave., New York, NY 10022
- **JPMorgan Chase** (Jamie Dimon) — JPMorgan Chase Tower, 383 Madison Ave., New York, NY 10179
- **HSBC** (Noel Quinn) — HSBC North America HQ: 452 Fifth Ave., New York, NY 10018
- **UBS / Credit Suisse** (Sergio Ermotti / Ulrich Körner (former)) — UBS Americas HQ: 1285 Avenue of the Americas, New York, NY 10019
- **Prudential** (Charles Lowrey) — Prudential Financial, 751 Broad St., Newark, NJ 07102
- **ICICI Prudential** (Anup Bagchi) — Serve at ICICI Prudential corporate address in India or via RA in the jurisdiction where suit is filed (use international service rules)

6) ENFORCERS / FIXERS

- **Anthony Pellicano** — Public business / counsel address (use counsel of record if he is represented): 9601 Wilshire Blvd., Suite 1200, Beverly Hills, CA 90210 (public-facing address historically associated; always attempt service via attorney of record first)

EXHIBIT C

Filed Antigua and Barbuda Carbon Compliance Market Act Exhibit
Submitted and Filed October 14, 2025

Case Number : ANUHCV2025/0149

EXHIBIT AG

Submitted Date: 14/10/2025 09:46

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

Fees Paid: 17.00

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

1. Short Title

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

2. Purpose

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

3. Definitions

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

4. Establishment of National Carbon Market Authority

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

5. Authorization of Project Developers

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

6. Eligible Projects

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

7. Verification and Certification

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

8. Ownership and Transfer

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

9. Government Revenue and Benefit-Sharing

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

10. Integration with International Systems

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

11. Legal Recognition of Digital Tokens

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

12. Offences and Penalties

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

13. Transitional Provisions

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

14. Regulations


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

15. Commencement

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

Explanatory Memorandum

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


Tammie Gage
Commissioner of Oath
Antigua and Barbuda