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Fees Paid: 52.00

IN THE HIGH COURT OF JUSTICE
EASTERN CARIBBEAN SUPREME COURT
ANTIGUA AND BARBUDA
CIVIL DIVISION

ALKIVIADES ANDREW DAVID (also known as Alki David) <i>Claimant in person</i>	Claim No.: [TO BE ASSIGNED]
- and -	
(1) THE ATTORNEY GENERAL OF ANTIGUA AND BARBUDA (2) STEADROY BENJAMIN (3) ZACHARY PHILLIPS <i>Defendants</i>	

CLAIM FORM AND PARTICULARS OF CLAIM

**DOCUMENT-PROVENANCE, PUBLIC-OFFICE, PRESERVATION,
PROCEDURAL-ACCESS, AND FORENSIC-DISCLOSURE CLAIM**

Core proposition: This case concerns the integrity of the judicial record. The Claimant seeks an authentic record, a complete audit trail, preservation of evidence, targeted disclosure, reasonable procedural access, and adjudication on evidence rather than assumption. Broader political, commercial, environmental, media, and international matters are pleaded only as context, motive, notice, preservation pathways, or matters requiring investigation - not as adjudicated facts.

IMPORTANT: The Claimant must insert the assigned claim number, address for service, and any required filing fee or fee-relief material before lodgment.

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1. BRIEF DETAILS AND VALUE

The Claimant seeks declaratory, preservation, disclosure, procedural-access, forensic-document, and damages relief arising from the alleged handling of disputed court documents; the alleged absence of a complete audit trail; the response to repeated notice; and related public-office conduct.

The claim exceeds EC\$5,000. Personal damages are reserved for assessment and expert proof. Any national, environmental, or public-project relief is sought only to the extent the Claimant establishes standing, lawful authority, causation, and a recognized cause of action. No asserted development valuation is pleaded as a presently liquidated or adjudicated public debt.

The principal immediate relief is narrow and practical: identify the authentic record; preserve the native evidence; disclose the chain of custody; identify each custodian and decision-maker; provide reasonable accommodations; and permit the disputed facts to be tested fairly.

2. PARTIES, CAPACITY, AND MATERIAL QUALIFICATIONS

1. The Claimant is a media and technology entrepreneur, environmental project developer, and litigant in person with a documented traumatic brain injury. The condition does not prevent him from litigating, but it requires clear written directions, reasonable time, accessible scheduling, breaks, and other proportionate procedural adjustments.

2. The Claimant states that Prime Minister Gaston Browne appointed him to serve as Ambassador to the Green Economy for the Government of Antigua and Barbuda. In that capacity, he developed, promoted, and represented green-economy, carbon-market, environmental-restoration, and national-development initiatives. He will rely on the appointment instrument, government correspondence, public statements, and witness evidence to establish the appointment's scope and duration.

3. The Claimant relies on the appointment and project records only to explain his personal involvement, notice, and interest in preservation. He does not in this claim assert authority to bind the Government, enforce any sovereign order, or recover public assets absent a specific legal instrument and proof of standing. Any legal effect of the appointment remains a matter for evidence and applicable law.

4. The Claimant is the author of the Carbon Compliance Market Act 2025 placed on the court record in ANUHCV2025/0149. He relies on it as contemporaneous evidence of the framework he developed for Antigua and Barbuda's green economy, not as enacted legislation unless formal enactment is proved. The First Defendant is the proper Crown or public-office defendant. The Second and Third Defendants are sued personally only for conduct lawfully attributable to them individually; official participation alone is not pleaded as wrongdoing.

3. PROCEDURAL BACKGROUND AND PRIOR FORMAL NOTICE

5. On 17 April 2025, the Claimant filed the original Claim Form and Statement of Claim in ANUHCV2025/0149. The Claimant states that the original document named fourteen defendant categories, including at Defendant No. 13 the Executive Members of the United Progressive Party (UPP), Antigua and Barbuda, and at Defendant No. 14 DOES 1-100.

6. On 3 February 2026, the Claimant filed a Notice of Factual Clarification identifying the UPP executive defendants, the asserted local nexus, and judicial-comity context. The filing was intended to preserve the Claimant's position concerning the original parties and completeness of the record.

7. The Claimant has repeatedly placed the disputed provenance, preservation, and alleged omission issues before court personnel, the Attorney General's Chambers, law-enforcement recipients, CID personnel, government recipients, and other relevant custodians.

8. The Claimant does not ask the Court to infer deliberate falsification from a visual difference alone. He asks for authentication, native files, metadata, version history, chain of custody, transmission records, document hashes, and testimony.

4. ORIGINAL RECORD, UPP DEFENDANTS, AND CONTESTED VERSION

9. The side-by-side comparison exhibited in the bundle shows the original filed defendant list and a later court-facing or draft-order caption. The original image visibly includes the UPP executive category; the later image proceeds from John McClain to DOES 1-100.

10. The Claimant alleges that the omission was capable of affecting the analysis of residence, local nexus, forum convenience, jurisdiction, and judicial comity. The precise legal consequence remains for the Court.

11. The requested determination is forensic and neutral: which version was filed; which version was supplied to chambers; who supplied it; what changes occurred; when they occurred; which systems preserved the files; and whether any judicial decision relied upon an incomplete or different version.

5. ATTORNEY GENERAL PARTICIPATION, NOTICE, AND DOCUMENT PROVENANCE

12. In ANUHCV2025/0149, the Attorney General appeared officially as amicus curiae through legal representatives, including Crown Counsel Zachary Phillips, and addressed jurisdiction and reasonable cause of action.

13. That official participation establishes direct institutional notice and makes the Attorney General's Chambers a likely custodian of submissions, correspondence, instructions, bundle versions, drafts, indexes, cover emails, and transmission records within its possession or control.

14. The Claimant relies upon communications involving court or chambers personnel concerning the source, assembly, supply, or curation of relevant documents. Each communication will be exhibited in full and quoted accurately.

15. The Claimant alleges that, after express notice of the discrepancy, the responsible public officers did not provide a complete and satisfactory audit trail. He seeks Registry-stamped originals; every amended or converted version; all native Word and PDF files; metadata; document hashes; bundle indexes; draft orders; and records identifying each person who selected, edited, converted, transmitted, received, reviewed, or relied upon the materials.

16. The Claimant further relies upon an apparent inconsistency between documented official participation and a later statement attributed to Steadroy Benjamin that he had never been involved in any matter concerning the Claimant. The inconsistency is pleaded as a matter requiring clarification and disclosure, not as proof of criminal conduct.

6. JUSTICE FOR ASOT MICHAEL AND PRESERVATION OF EVIDENCE

17. The late Honourable Asot Michael was the Claimant's close friend and business or project partner. The Claimant states that he and Mr. Michael were expected to be together on the day of Mr. Michael's death. This gives the Claimant a direct personal connection to the surrounding chronology and a profound interest in ensuring that all relevant evidence is preserved and properly investigated.

18. Following Mr. Michael's death, the Claimant spoke with attorney Leon Chaku Symister, who represents Alexta Francis, the person charged in connection with Mr. Michael's death, and with Nigel Michael, Mr. Michael's son. The Claimant recalls discussing with Mr. Symister whether the circumstances could indicate political motivation. This recollection is not pleaded as an admission, a formal position of counsel, or an adjudicated fact.

19. The Claimant states that Nigel Michael shares the concern that Mr. Francis had no ordinary or legitimate reason to be present in the house at the relevant time. The Claimant further states that concerns were raised that Mr. Francis may have been coerced, manipulated, directed, or used by others. These are serious matters requiring investigation, not established findings, and the Claimant does not ask this civil Court to determine Mr. Francis's guilt or innocence.

20. The Claimant has identified communications, project records, political and commercial conflicts, witness pathways, and other material that he believes warrant independent examination. He seeks preservation and lawful disclosure of relevant communications, telephone records, financial records, witness accounts, movements, instructions, relationships, and evidence capable of establishing why Mr. Francis was present, whether he acted independently, and whether any other person influenced, assisted, directed, or benefited from the events.

21. Despite repeated notice, the Claimant has not received a substantive account demonstrating that these evidentiary pathways have been fully preserved, referred, and independently investigated. The Claimant does not allege in this civil claim that the Attorney General personally committed or directed the homicide. His complaint is that no adequate preservation, referral, investigation record, or substantive response has been disclosed to him.

22. The Claimant therefore respectfully seeks justice for Asot Michael through a lawful, independent, evidence-led investigation, together with preservation, disclosure, referral, and accountability sufficient to ensure that no relevant record, witness account, financial trail, communication, or project interest is ignored or lost.

7. MOTIVE AND ALTERNATIVE INFERENCES REQUIRING DISCLOSURE

24. The Claimant does not plead that the precise subjective motive of any Defendant has been conclusively established. Motive is pleaded as an inference from the chronology, official participation, notice, disputed record, responses, and identified interests. The alternatives below may be cumulative or mutually exclusive and require disclosure.

A. Institutional self-protection

If personnel within the Attorney General's Chambers received, assembled, supplied, or relied upon a materially incomplete version, there would be an institutional incentive to minimize involvement, resist disclosure, or avoid creating an audit trail exposing administrative or professional failure.

B. Preservation of the amicus litigation position

Because the Attorney General's representatives addressed jurisdiction and reasonable cause of action, the omitted local-defendant category may have complicated the position advanced. A possible motive for resistance to correction would be avoidance of reopening the forum or jurisdiction analysis.

C. Political sensitivity

The omitted category concerned executive members of a major political party. The presence or absence of that category could carry political consequences and could create incentives to limit scrutiny, exposure, or adjudication.

D. Reputational and institutional exposure

Acknowledging an incomplete record or an inability to account for its provenance could expose the Attorney General's Chambers, the Registry, or other institutions to criticism. The Claimant pleads this as a possible explanation for distancing, delay, or minimization.

E. Commercial and intellectual-property relationships

The Claimant's filings identify entertainment, hologram, media, licensing, offshore intellectual-property, and related commercial pathways. Any motive based on protecting such relationships must be tested through specific communications, agreements, payments, ownership records, and disclosure rather than assumed.

F. Control of green-economy and national-development opportunities

The Claimant alleges that his projects and his partnership with Asot Michael involved potentially substantial national opportunities. Political or commercial actors may have had incentives to control, redirect, appropriate, delay, or diminish those opportunities. This remains an investigatory pathway requiring primary evidence.

G. Personal hostility or retaliation

The Claimant alleges that direct confrontation, removal from an office, dismissive responses, and failure to engage meaningfully may support an inference of hostility. Hostility is legally relevant only if it influenced a public

Consolidated inference: The circumstances provide a proper basis for targeted disclosure and forensic examination to determine whether the conduct resulted from mistake, institutional defensiveness, political pressure, commercial alignment, personal retaliation, or deliberate misuse of public office. The Claimant further states that materials identified in his SDNY filings raise a broader concern - pleaded only as an inference requiring investigation - that coordinated private actors and internationally connected interests may have sought to destabilize or improperly influence Antigua and Barbuda's institutions and development priorities. He specifically relies on alleged courtroom and litigation activity by persons he associates with Daphne Barak. No foreign court is said to have adopted that contention, and the Claimant seeks disclosure and authentication rather than a finding based on assertion alone.

8. DALLAS / EASTERN DISTRICT OF TEXAS NOTICE AND EVIDENTIARY USE

25. The Claimant is also a pro se plaintiff or interested litigant in proceedings in the United States District Court for the Eastern District of Texas, Sherman Division, including Civil Action No. 4:23-cv-00435-SDJ-BD.

26. The Claimant intends to notify that Court of this Antiguan filing and, where permitted, rely upon the filing and its authenticated exhibits as evidence of chronology, notice, preservation demands, asserted motive, witness-custodian pathways, and the relationship between Antigua-based events and his Texas allegations.

27. This pleading does not ask the Antiguan Court to decide the merits of the Texas case, and it does not represent that the Texas Court has adopted the Claimant's allegations. Likewise, any use in Texas remains subject to the Federal Rules of Evidence, applicable procedure, judicial notice standards, authentication, relevance, privilege, and the orders of that Court.

28. To facilitate legitimate cross-court use, the Claimant seeks a reliable certified record, stable exhibit numbering, native-file preservation, document hashes where available, and clear identification of each custodian and source.

9. DIRECT NOTICE, PUBLIC DISSEMINATION, AND PROCEDURAL ACCESS

29. The Claimant alleges sustained direct notice to Legal Affairs, court personnel, CID, named investigators, government recipients, political figures, and custodians through filings, emails, messages, attachments, and personal communications.

30. Public articles and notices are relied upon only for publication, chronology, consistency, notice, and opportunity to respond. Publication is not pleaded as proof that every underlying allegation is true and is not a substitute for formal service.

31. The Claimant gave notice of his documented TBI and requested practical adjustments needed for meaningful participation. He does not seek relaxation of substantive pleading or evidentiary standards. He seeks equal procedural access.

10. CAUSES OF ACTION

A. Mifeasance in Public Office

32. The Claimant alleges that personally named public officers exercised or purported to exercise public functions in connection with receipt, assembly, transmission, presentation, retention, investigation, or response to the contested materials. The Claimant alleges targeted bad faith or reckless indifference only insofar as it can reasonably be inferred from identified notice, custody, responses, continued conduct, and disclosure. Official participation, silence, administrative error, or an adverse legal position alone is not pleaded as sufficient.

B. Declaratory, Preservation, and Record-Integrity Relief

33. The Claimant seeks declarations and preservation relief concerning the identity, provenance, completeness, custody, authenticity, and use of the disputed court documents and related records.

C. Negligence or Breach of Duty - Alternative Pleading

34. If Antiguan law recognizes a private duty in the pleaded circumstances, the Claimant alleges negligent handling, preservation, communication, or referral of identified records after actual notice of a foreseeable risk of procedural or personal injury.

D. Procedural Access and Reasonable Accommodation

35. The Claimant seeks prospective case-management accommodations. Any damages claim will be confined to a recognized constitutional, statutory, or common-law cause of action and particularized against the responsible decision-maker.

E. Ancillary Disclosure Concerning Asot Michael and Related Evidence

36. The Claimant seeks disclosure and preservation concerning his partnership with Asot Michael and official responses to the Claimant's referrals, not a civil determination of criminal responsibility for the homicide.

11. CAUSATION, PREJUDICE, AND LOSS

37. The Claimant alleges that use of or reliance upon a materially incomplete record, together with failure to provide an audit trail after notice, impaired his ability to present the local nexus, protect claims, seek review, authenticate evidence, and maintain confidence in the official record.
38. The Claimant will provide an event-by-event causation schedule identifying the alleged act, date, responsible person, immediate procedural consequence, corrective work, expense, lost opportunity, medical effect, and supporting exhibit.
39. Personal losses may include reasonable reconstruction and litigation costs, delay-related losses, specific lost transactions, impairment of reputation or financing supported by third-party records, and medically supported injury or aggravation.
40. National, environmental, or public-project losses will not be recovered by the Claimant unless standing and authority are proved. Otherwise, those matters are relied upon only as motive, context, and evidence of the scale of the opportunities allegedly impaired.

12. RELIEF SOUGHT

1. A declaration identifying the authentic original and provenance of each contested version;
2. Preservation of native files, emails, attachments, pleadings, indexes, metadata, audit logs, Registry records, chambers correspondence, Attorney General's Office communications, CID records, and device or cloud backups;
3. Forensic comparison of all relevant versions, subject to lawful privilege and confidentiality protections;
4. Identification of each person who selected, edited, converted, transmitted, received, reviewed, relied upon, investigated, or declined to investigate the contested materials;
5. Preservation and targeted disclosure concerning Asot Michael, his partnership and green-economy plans with the Claimant, their communications, project structures, ownership or succession interests, and official responses to the Claimant's referrals;
6. Production of records showing what scrutiny, referral, preservation, or investigation was undertaken after the Claimant placed the Attorney General and other authorities on notice;
7. Prospective reasonable procedural accommodations for the Claimant's documented TBI;
8. Damages for any properly pleaded and proved cause of action;
9. Interest, costs, and such further or other relief as the Court considers just.

13. STATEMENT OF TRUTH

I believe that the facts stated in these Particulars of Claim are true. Where matters are identified as allegations, inferences, estimates, or the Claimant's position, I honestly believe there is a proper basis for placing them before the Court. I understand 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.

Signed: 

ALKIVIADES ANDREW DAVID
Claimant in person

Dated: 14 July 2026

Address for service: [INSERT BEFORE FILING]

11A. WILLIAMS ORDER, PROCEDURAL DEFAULTS, APPEAL, AND RESERVED LOSS CLAIM

41. The Claimant relies on the order of the Honourable Justice Rene Williams dated 6 May 2026 in Claim No. ANUHCv2025/0149 (the Williams Order). The Claimant characterizes it as an order of the High Court of Antigua and Barbuda entered in proceedings brought in his name and involving asserted national-development interests.

42. The Williams Order stayed the Antiguan proceedings on forum grounds. The Claimant pleads that it did not determine the truth or falsity of the substantive allegations, did not adjudicate liability or damages, and did not exonerate any defendant on the merits. The Claimant further pleads that the Order identified the United States or England as the forum in which the substance of the dispute should proceed, subject to the precise terms of the sealed order.

43. The Claimant states that the Williams Order expressly authorized or preserved an appellate route. The Claimant therefore pleads that the stay, the status of the parties, the record-integrity issues, and the consequences of any defaults remain capable of appellate review and have not been extinguished by a merits judgment.

44. The Claimant states that seventy-three defendants had failed to respond or defend in the Antiguan proceedings. He relies on the Registry record, affidavits of service, certificates, docket entries, and related materials to establish the exact procedural status of each defendant. For avoidance of doubt, a procedural default is not pleaded as identical to a final default judgment unless and until the court record establishes that judgment was entered.

45. The Claimant alleges that the pattern of non-response was coordinated or orchestrated. That allegation is pleaded as an inference requiring disclosure and proof, not as an adjudicated finding. Relevant evidence includes communications among defendants or counsel, common instructions, funding arrangements, litigation coordination, service responses, and conduct surrounding the forum application.

46. The Claimant states that an operative order should have been issued or perfected following proceedings on or about 16 January 2026, but was not issued until later. He alleges that the delay impaired his ability to rely on the Antiguan record, pursue appellate or foreign-forum relief, obtain financing, protect transactions, and preserve commercial and national-development opportunities.

47. The Claimant reserves a claim for personal, commercial, and delay-related loss directly caused by any legally actionable delay, record failure, public-office misconduct, or obstruction proved against a proper defendant. He will provide an event-by-event causation and quantum schedule identifying the date, act or omission, responsible person, immediate consequence, mitigation, lost transaction or opportunity, and supporting third-party evidence.

48. The Claimant does not plead that the Williams Order itself awarded damages or converted projected public or development value into an immediately enforceable debt. He relies on it as a binding, appealable, non-merits forum order whose legal effect, together with the default record and alleged delay, must be preserved and accurately presented in Antigua, the United States, or England.

49. The Claimant seeks: (a) certification of the Williams Order and the complete docket; (b) identification of the procedural status of each of the seventy-three defendants; (c) preservation of service, default, correspondence, and forum-application records; (d) clarification that the stay was not a merits adjudication; (e) preservation of appellate and foreign-forum rights; and (f) leave to prove any recoverable loss through proper evidence and legal causes of action.

Important qualification: *The precise wording of the sealed Williams Order, the Registry record, and any appellate authorization controls over this summary. A certified copy should be exhibited before final reliance.*

16. SHORT PRAYER AND FORENSIC SUMMARY

- 50.** This claim is deliberately narrow. The Claimant does not ask the Court, at this stage, to determine broad political, criminal, commercial, or cross-border allegations. He asks the Court to identify the authentic record, preserve the native evidence, disclose the audit trail, determine who handled each material version, and permit disputed facts to be tested by admissible evidence.
- 51.** The immediate questions are forensic: what was filed; what was later supplied or relied upon; whether any material category or party was omitted; when and by whom any alteration, conversion, transmission, or substitution occurred; what systems retain the native files and metadata; and what corrective action followed notice.
- 52.** The Claimant respectfully prays for proportionate relief limited to authentication, preservation, targeted disclosure, identification of custodians and decision-makers, reasonable procedural accommodations, certification of the operative orders and docket, and such damages as may later be proved under a recognized cause of action.

PRAYER

May the Court protect the integrity of its own record, preserve the evidence before it is lost, permit the truth to be tested without assumption or prejudice, and ensure that every party - including a litigant with a documented traumatic brain injury - receives fair and meaningful procedural access.

This prayer is not offered as evidence and does not enlarge the pleaded causes of action. It summarizes the narrow forensic and procedural relief sought.

EXHIBIT X - DRAFT EVENT-BY-EVENT CAUSATION AND PREJUDICE SCHEDULE

This high-level schedule supplements paragraph 38. Each entry remains subject to certified records, invoices, correspondence, medical evidence, third-party transaction documents, standing, duty, causation, remoteness, mitigation, admissibility, and proof.

Date / event	Act or omission requiring proof	Immediate consequence	Prejudice / evidence to be supplied
17 Apr 2025	Original claim filed with fourteen defendant categories.	Operative pleading and local nexus placed on record.	Registry-stamped claim, filing receipt, native file, and service materials.
2025-2026	A later court-facing or draft-order version allegedly omitted the UPP category.	Possible distortion of the jurisdiction and forum record.	Native files, metadata, hashes, version history, cover emails, and custody evidence.
16 Jan 2026	Claimant states an operative order should have issued or been perfected.	Delay in reliance on the court outcome.	Minute, transcript, draft order, correspondence, and proof of the expected date.
3 Feb 2026	Notice of Factual Clarification filed identifying the discrepancy.	Direct notice to court and relevant custodians.	Filed notice, service evidence, acknowledgments, and delivery records.
6 May 2026	Williams Order stayed the Antigua claim on forum grounds without deciding merits.	Foreign-forum reliance and appeal steps became necessary.	Certified order, reasons, appellate language, docket, and related correspondence.
Default period	Claimant states seventy-three defendants failed to respond after service.	Claimant says default-related rights and strategy were affected.	Defendant-by-defendant service/default schedule and Registry certification.
After repeated notice	No complete audit trail was provided to the Claimant.	Additional reconstruction work, delay, and uncertainty.	Preserved correspondence, requests, responses, invoices, and time records.
Cross-jurisdictional use	Claimant sought to rely on the authenticated Antigua record abroad.	Authentication and evidentiary barriers arose.	Texas/SDNY filings, court directions, certification requests, and associated costs.
Medical / access impact	Claimant states delay and uncertainty aggravated TBI-related litigation burdens.	Additional stress, repetition, and accommodation needs.	Focused medical excerpt, accommodation requests/orders, and treating-professional evidence.
Commercial / lost opportunity	Claimant reserves specific delay-related transaction losses.	Potential financing, transaction, or project prejudice.	One transaction at a time: contract, lender record, valuation method, causation, and mitigation.

No item in this schedule is pleaded as a liquidated loss or adjudicated fact. The schedule identifies the evidence required to convert asserted prejudice into provable causation.

INDEX OF EXHIBITS

Exhibit	Date	Description	Bundle page
A-001 / A	17 Apr 2025	Original claim caption and comparison with the contested later version.	12
B-001 / B	3 Feb 2026	Filed Notice of Factual Clarification concerning UPP defendants, geographical nexus, and comity.	13-14
C-001 / C	14 Oct 2025	Claimant-authored Carbon Compliance Market Act 2025, filed as Exhibit AG; not pleaded as enacted law unless enactment is proved.	15-16
D-001 / D	Mar-Jul 2026	Public-notice article and preserved printout, relied on for chronology and notice rather than proof of every assertion.	17-24
E-001	To be certified	Exact amicus order, appearance record, or transcript showing Attorney General participation through Crown Counsel.	To insert
F-001	Various	Court, chambers, Registry, and Attorney General communications concerning source, assembly, custody, and transmission.	To insert
G-001	Various	Asot Michael communications and project records supporting friendship, partnership, chronology, and preservation pathways.	To insert
H-001	Various	Official referral and investigation records concerning evidence supplied after Asot Michael's death.	To insert
I-001	2023-2026	EDTX and SDNY materials relied on only for notice, chronology, alleged relationships, and evidentiary pathways; not foreign-court findings.	To insert
J-001	2023-2026	Focused TBI medical excerpt, MRI summary, or prior accommodation order.	To insert
X-001	13 Jul 2026	Draft Event-by-Event Causation and Prejudice Schedule supplementing paragraph 38.	10

Attorney General participation. A certified amicus order, appearance transcript, or Registry record should replace any secondary description before final evidentiary reliance.

TBI support. Exhibit J-001 should be limited to the diagnosis or imaging finding, functional litigation impacts, and accommodations previously recommended or ordered.

Consistent naming. The Attorney General is sued in the appropriate representative capacity. Steadroy Benjamin and Zachary Phillips are named individually only for specific acts, knowledge, decisions, or states of mind pleaded against them.

14. SCHEDULE A - MASTER EVIDENCE MATRIX

ID	Item	Proposition	Custodian / Status
A-001	Original Claim Form - 17 Apr 2025	Original fourteen-category caption and UPP category	Registry / certify
A-002	Contested later version	Omission and provenance issue	Chambers / AG / Registry
B-001	Notice of Factual Clarification - 3 Feb 2026	Preserves original naming and local nexus	Filed ECSC record
C-001	Carbon Compliance Market Act exhibit	Contemporaneous green-economy framework	
D-001	Public-notice article and preserved printout	Publication, chronology, notice	Truth disputed
E-001	Court / chambers / Joseph communications	Source, assembly, or curation of materials	Exact originals required
F-001	Attorney General amicus order / appearance record	Official participation and institutional notice	Certified order required
G-001	Asot Michael communications and project records	Partnership, introduction, green-economy plans, preservation	Claimant / government / third parties
H-001	Official homicide investigation and referral records	Scope of scrutiny, preservation, and response	Police / CID / Legal Affairs
I-001	ED Texas filings and docket materials	Cross-court notice, chronology, and evidentiary use	Federal docket; not findings
J-001	TBI medical evidence and accommodation requests	Procedural access and prejudice	Medical custodians / filed notices

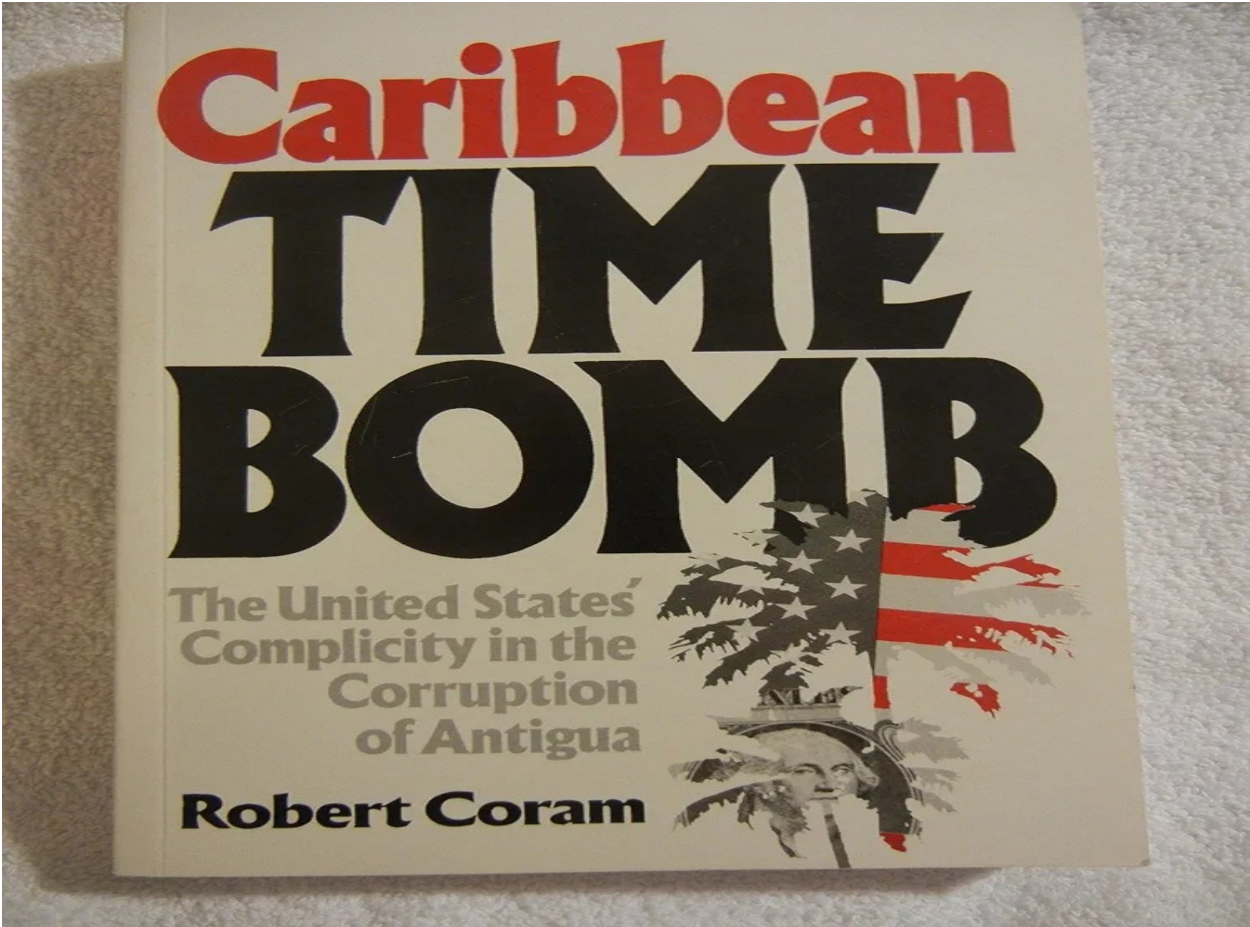
15. EXHIBITS

The exhibits appended after this page are reproduced from the previously assembled filing bundle. Their inclusion establishes the content and existence of the source materials. Disputed factual assertions remain subject to authentication, admissibility, and proof.

Exhibit navigation: Use the PDF bookmark panel or the clickable menu. The appended exhibits retain their original page appearance.

EXHIBIT E - COURT ORDER RECORDING ATTORNEY GENERAL PARTICIPATION

Image supplied by the Claimant. It should be replaced with a certified or Registry-issued copy before final evidentiary reliance if available.



EXHIBITS

The following exhibits are reproduced for review. Their inclusion establishes the content and existence of the source material; disputed factual assertions remain subject to proof.

EXHIBIT A - SIDE-BY-SIDE CAPTION COMPARISON

ANTIGUA AND BARBUDA

Claim No: [To be assigned by Registry]

BETWEEN:

ALKIVIADES DAVID

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

Claimant

— AND —

1. DAVID BOIES, of Boies Schiller Flexner
2. GLORIA ALLRED, of Allred, Maroko & Co
3. DANI PERETZ, of Geneva, Switzerland &
4. SHARI REDSTONE, of Paramount Glob
5. DAPHNE BARAK, of Beverly Hills, Calif
6. MICHAEL AVENATTI, formerly of Eagan
7. TOM GIRARDI, incarcerated at Federal I
- USA
8. BLACK CUBE LTD, on Israeli-owned pri
- and Tel Aviv, Israel
9. LIMEWIRE NFT HOLDINGS, with assets
10. EDGAR BRONFMAN SR. (Deceased), &
11. JOHN BRANCA, of West Hollywood and
12. JOHN MCCLAIN, music executive, of Lo
13. THE EXECUTIVE MEMBERS OF THE UN
- Antigua & Barbuda
14. And DOES 1-100

Defendants

H COURT OF JUSTICE

49

VIADES 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
3. DOES 1-100

Defendant

DRAFT ORDER

LE JUSTICE RENE WILLIAMS (IN

DAY October 2025

DAY 2025

Demonstrative comparison of the original filed defendant list and a later draft-order caption. The underlying source documents, not the composite image alone, must be authenticated and compared.

Case Number :ANUHCV2025/0149



IN THE HIGH COURT OF JUSTICE
EASTERN CARIBBEAN SUPREME COURT
ANTIGUA AND BARBUDA

Submitted Date:03/02/2026 09:50

Claim No.: ANUHCV2025/0149

Filed Date:03/02/2026 09:51

BETWEEN
ALKIVIADES DAVID
Claimant

Fees Paid:12.00

-and-

[DEFENDANTS AS ORIGINALLY NAMED]

**NOTICE OF FACTUAL CLARIFICATION
(UPP EXECUTIVE DEFENDANTS, GEOGRAPHICAL NEXUS, AND JUDICIAL COMITY)**

1. The Claimant files this Notice solely to assist the Court by clarifying factual matters apparent on the record concerning the parties originally named, geographical nexus, and practical context relevant to forum convenience and judicial comity.

A. ORIGINAL NAMING OF THE UPP EXECUTIVE DEFENDANTS

2. The Original Claim Form filed on 17 April 2025 named fourteen (14) Defendants.
3. Defendant No. 13 is expressly pleaded as: *“THE EXECUTIVE MEMBERS OF THE UNITED PROGRESSIVE PARTY (UPP), Antigua & Barbuda.”*
4. The designation above constitutes the executive branch of the United Progressive Party, named as a Defendant class resident within Antigua and Barbuda.
5. Defendant No. 14 was pleaded separately as *“AND DOES 1–100”* and was later assigned to Gary Dordick and Dordick Law.

B. GEOGRAPHICAL NEXUS AND PRACTICAL ACCESSIBILITY

6. The Defendants include persons resident in Antigua and Barbuda as well as persons situated across multiple international jurisdictions.
7. Antigua and Barbuda is a jurisdiction that is practically accessible to international parties by modern means of travel, electronic communication, and remote participation, and presents no material impediment to engagement with the proceedings.
8. The proceedings are properly seized in this jurisdiction, and the presence of locally resident Defendants establishes a clear territorial nexus.

C. JUDICIAL COMITY AND CONTEXT

9. The Claimant notes, as factual context, that determinations arising from these proceedings have relevance to, or are of interest in, other jurisdictions where related civil or federal proceedings exist or are contemplated.
10. In that context, the orderly exercise of jurisdiction by this Honourable Court serves the interests of judicial comity, legal certainty, and coordinated administration of justice, rather than fragmenting related issues across multiple forums.

11. This Notice is filed without submission or argument, without criticism of any party or amicus, and solely to ensure the accuracy and completeness of the Court record.

Dated: 03 February 2026

Filed by:

/s/ **ALKIVIADES DAVID**

Claimant in Person

Digitally signed by Alkiviades David on 03 February 2026

Exhibit B, source page 2

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

Exhibit C, source page 2

Mon, Jul 13th, 2026 6:10:59 AM



REAL TALK

NEWS

STEADROY BENJAMIN – ANTIGUA’S TRAITOR: A Court Record, a Complaint, and a Question That Won’t Go Away.

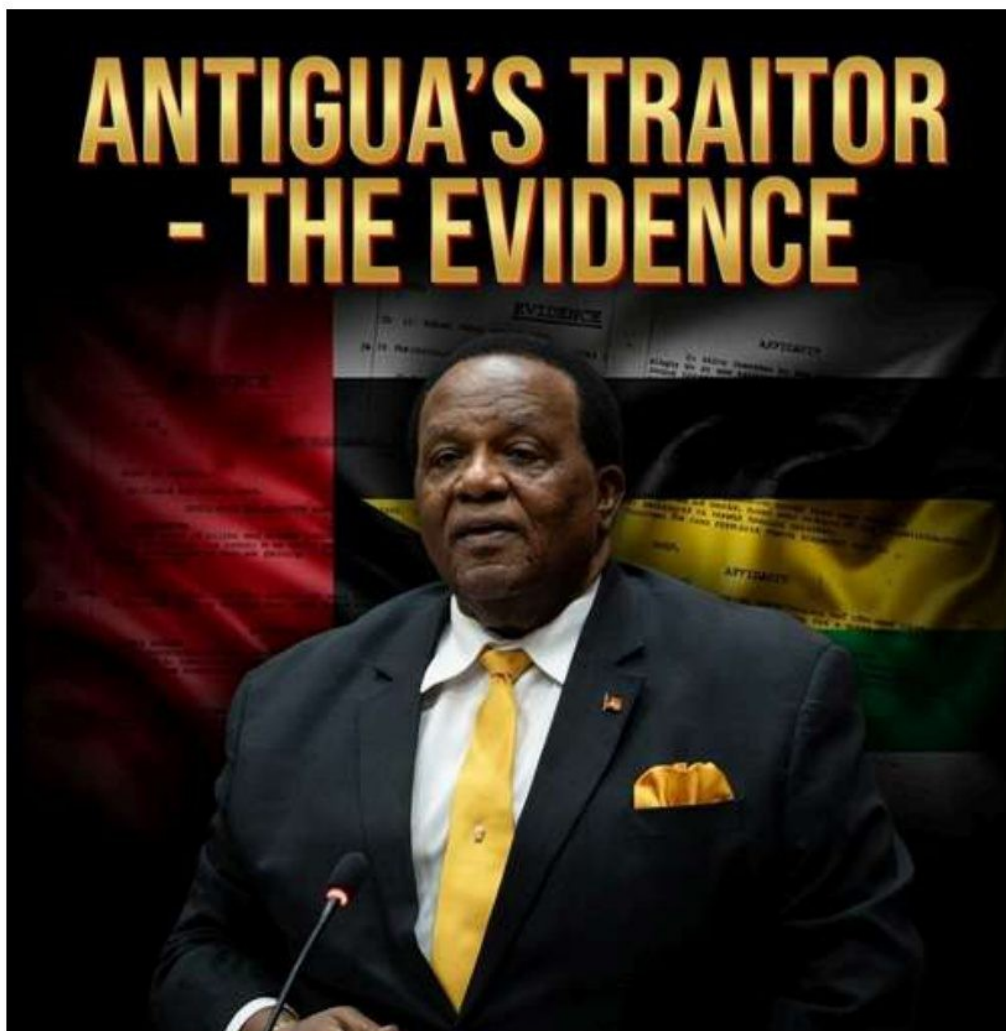


By Alki David

MAR 31, 2026

How can I help you?

Exhibit D, source page 1



Here it is...

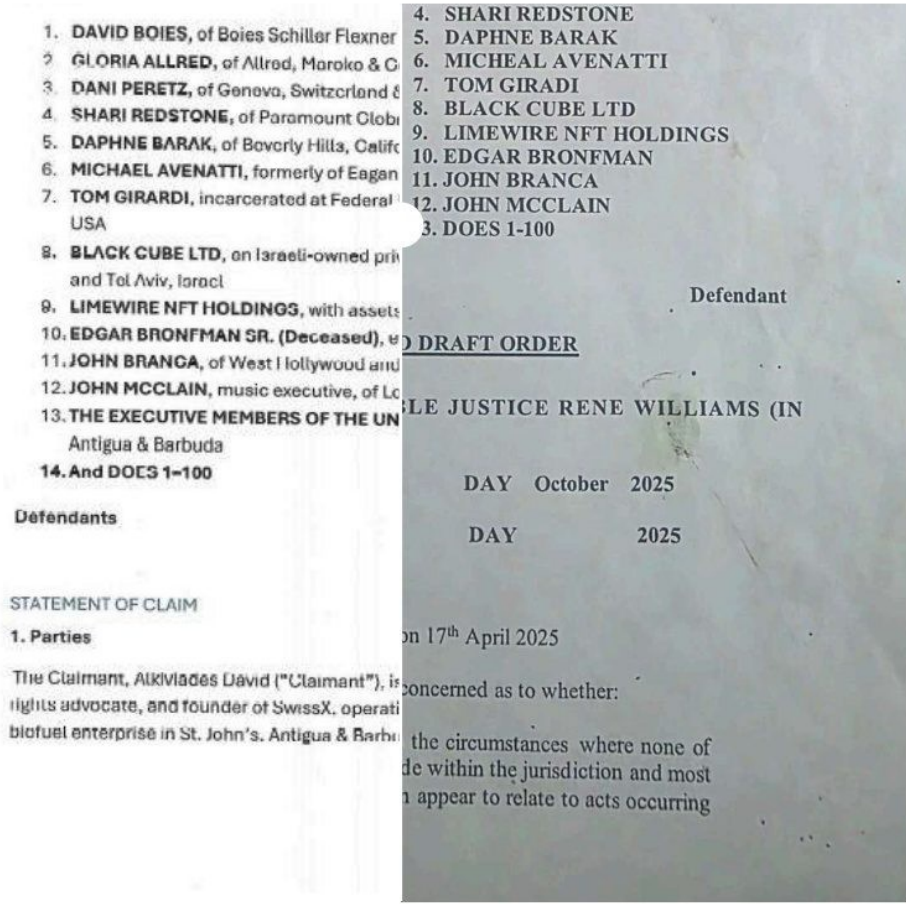
The question posed to the court and to AG Steadroy Benjamin. Still waiting for an answer.

Case Number :ANUHCV2025/0149	
IN THE HIGH COURT OF JUSTICE	
ANTIGUA AND BARBUDA	
Claim No: [To be assigned by Registry]	
BETWEEN:	
ALKIVIADES DAVID	
<i>of SwissX Island, St. John's, Antigua & Barbuda</i>	
Claimant	
— AND —	

ANTIGUA AND BARBUDA SUPREME COURT	
H COURT OF JUSTICE	
49	
VIKIADES DAVID	
And	Claimant
1. DAVID BOIES	
2. GLORIA ALLRED	
3. DANI PERETZ	

How can I help you?

Exhibit D, source page 2



This side-by-side comparison shows why the dispute matters. The UPP and six executive members were removed from the contested version of the document, not accidentally, but in a way that directly affected the jurisdiction of the claim. Remove them, and the lawsuit risks being shut down on jurisdictional grounds, forcing the claimant to start again from scratch — a reset that would likely have killed the case altogether.

For context, I raised this issue directly at the Attorney General's Chambers.



This is no longer a local dispute. The multi-jurisdictional consequences now extend into the United States, where Attorney General Mac Warner of the US Department of Justice – Civil Division – is aware of the escalating appellate record, including Prime Minister Gaston Browne's (and mine as well as I was duly named in the suit), recent Southern District of New York win against defamation arising from the Alpha Nero matter. That record does not stand in isolation; it connects directly into the broader Diddy Combs and Pellicano – David Boies network already exposed across multiple proceedings.

When I attended Antigua's AG Office / Benjamin – to seek clarification on the discrepancy, the response was immediate and hostile. I was ordered to leave, and the Assistant Commissioner of Antigua's Police was invoked as a form of personal enforcement. The Attorney General expressed clear outrage at being questioned on the matter at all.

That interaction did not resolve the issue. It reinforced it.

 How can I help you?

Exhibit D, source page 4

[Released for public scrutiny: Confidential report – Jeffers](#) [Download](#)



At the governmental level, contact has also been made between the Dallas Police Department and the Royal Police Force of Antigua and Barbuda. That communication underscores that these issues are not being treated as isolated local complaints, but as part of a wider law-enforcement picture with cross-border implications. The filings and supporting materials provided to Commissioner Jeffers therefore sit within a broader matrix of simultaneous proceedings, investigations, and reported criminal events spanning multiple jurisdictions.

At its heart is one clear, serious question:

Was a document in a live High Court proceeding altered?

The Carbon Act is the prize. It is the gateway to energy independence, sovereign carbon value, and a new economic order for Antigua and Barbuda. That is why the old-world fossil-fuel bullies want it buried, discredited, and strangled before it can stand. This warfare. It is an attempt to crush a nation's right to power itself.

[How can I help you?](#)

Exhibit D, source page 6

Case Number :ANUHCV2025/0149

FILED
HIGH COURT
ANTIGUA AND BARBUDA

EXHIBIT AG Submitted Date:14/10/2025 09:46

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

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3. Definitions

Carbon Credit means a tradable certificate representing one metric ton of carbon dioxide reduced.

[AG-Carbon-Act-Filed-Exhibit-14th-October-2025 \(1\)](#) Download

A Carbon Union built around Antigua could unlock **up to \$8 billion a year** in new value by turning restoration, biofuel, biochar, carbon credits, and sovereign island production into protected national assets — giving Antigua a path to jobs, ownership, energy independence, and real economic freedom for its people.

THE ISSUE IS SIMPLE — AND THAT'S WHY IT MATTERS

This is not about global conspiracies or personal disputes.

It is about something every Antiguan understands at a fundamental level:

If the court record cannot be trusted, nothing else can be.

The complaint arises directly from proceedings in **Claim No. ANUHCV2025/0149**, part of broader litigation involving jurisdictions in Antigua, the United States, and the United Kingdom.

A specific document now under scrutiny is alleged to differ materially from the version originally filed with the court.

That is not a minor technicality.

It marks the line between:

- justice and manipulation
- proper process and abuse of process

FINAL WORD

This is not noise.

It is a recorded escalation: across courts, across jurisdictions, and now within law enforcement.

Handled correctly, it strengthens Antigua's institutions. Ignored or sidelined, it weakens them.

In a small nation where trust in the justice system is everything, that distinction matters more than ever.

The file now rests with the Commissioner of Police.

The next step is not commentary. **It is verification.**

🕒 How can I help you?

Exhibit D, source page 7

The official record will do one of two things: confirm the integrity of the system — or expose a failure that cannot be ignored.

Antigua and Barbuda deserves a justice system its people can trust without reservation.



<< Miami Attorney Ariel Mitchell Suspended After Pleading Guilty to Misconduct in Sean 'Diddy' Combs Related Case

EXCLUSIVE: THE EPSTEIN CLASS DIES ON THE RECORD — History Will Remember This Week >>

By Alki David



Alki David — Publisher, Media Architect, SIN Network Creator - live, direct-to-public communication, media infrastructure, accountability journalism, and independent distribution. Born in Lagos, Nigeria; educated in the United Kingdom and Switzerland; attended the Royal College of Art. Early internet broadcaster — participated in real-time public coverage during the 1997 Mars landing era using experimental online transmission from Beverly Hills. Founder of FilmOn, one of the earliest global internet television networks offering live and on-demand broadcasting outside legacy gatekeepers. Publisher of SHOCKYA — reporting since 2010 on systemic corruption inside the entertainment business and its expansion into law, finance, and regulation. Creator of the SIN Network (ShockYA Integrated Network), a federated media and civic-information infrastructure spanning investigative journalism, live TV, documentary, and court-record reporting. Lived and worked for over 40 years inside global media hubs including Malibu, Beverly Hills, London, Hong Kong and Gstaad. Early encounter with Julian Assange during the first Hologram USA operations proved a formative turning point — exposing the realities of lawfare, information suppression, and concentrated media power. Principal complainant and driving force behind what court filings describe as the largest consolidated media-legal accountability action on record, now before the Eastern Caribbean Supreme Court. Relocated to Antigua & Barbuda and entered sustained legal, civic, and informational confrontation over media power, safeguarding, and accountability at Commonwealth scale.

Archives

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REAL TALK

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How can I help you?

Exhibit D, source page 8