

**SWISSX | FILMON | HOLOGRAM USA
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

ALKIVIADES DAVID,
Plaintiff,

v.

COMCAST CORP., et al.,
Defendants.

Civil Action No. 4:23-cv-00435-SDJ

**EMERGENCY MOTION FOR PRESERVATION OF
EVIDENCE, TEMPORARY RESTRAINING ORDER
AS TO DROPBOX / DOWNLOAD.COM
DISTRIBUTION, LEAVE FOR SEALED/IN CAMERA
SUBMISSION, REFERRAL TO LAW
ENFORCEMENT, AND REQUEST FOR INTER-
COURT ASSISTANCE - DKT. 28**

**EMERGENCY SUPPLEMENT TO DKT. 28 AND REQUEST FOR IMMEDIATE
PROTECTIVE ACTION**

Plaintiff Alkiviades David submits this emergency supplement in support of Dkt. 28. Plaintiff asks for immediate preservation, a temporary restraining order aimed at preventing further Dropbox/cloud or Download.com/CNET-related distribution, leave to submit sensitive materials under seal or in camera, referral of appropriate sealed materials to law enforcement, and inter-court assistance concerning the SDNY Alfa Nero/Furman record.

This filing is not a request for premature merits findings. It is a request to protect the record, protect witnesses, prevent spoliation, prevent further distribution of suspected unlawful materials, and allow the truth to be tested through lawful process before evidence disappears.

Plaintiff further states that this filing is only an emergency summary. There is substantially more evidence, including texts, emails, recordings, witness materials, source records, repository information, and sealed evidence believed to be in or around the SDNY Alfa Nero/Furman record, available for sealed or in camera review.

RELIEF REQUESTED

1. Permit sealed or in camera submission of witness-safety, victim-safety, CSAM-related, trafficking-related, intimidation-related, Alfa Nero-related, Asot Michael-related, court-assault-related, Download.com/CNET-related, Dropbox/cloud-repository-related, and cross-border evidence.
2. Refer appropriate sealed materials to the FBI, Homeland Security Investigations, Dallas law enforcement, Antigua CID, child-protection authorities, cybercrime units, or any other proper authority.
3. Order immediate identification and preservation of custodians, repositories, devices, cloud accounts, Dropbox accounts, Download.com/CNET distribution records, law-firm files, metadata, communications, payment records, family-office records, retainer materials, court-security records, CCTV footage, and source materials relevant to these emergency concerns.
4. Enter a temporary restraining order prohibiting any person with notice from distributing, uploading, downloading, linking to, indexing, promoting, monetizing, mirroring, deleting, altering, or transferring any Dropbox/cloud or Download.com/CNET-related materials that are alleged to contain or relate to Camila / NXIVM / Bronfman / CSAM evidence pathways, except through sealed lawful forensic or law-enforcement channels.
5. Suspend deletion, wiping, auto-destruction, alteration, transfer, sale, or destruction of relevant materials and require sworn certification of compliance before further proceedings.
6. Prohibit intimidation, retaliation, harassment, coercion, or pressure directed at witnesses, victims, family members, reporting sources, or persons assisting with lawful preservation.
7. Seek appropriate inter-court assistance, or authorize such process as the Court deems proper, to obtain SDNY Alfa Nero/Furman records mentioning or relating to Alkiviades David / Alki David, including any sealed evidence, filings, transcripts, exhibits, declarations, and materials concerning the Nielson / Boies Schiller statements.

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**TEMPORARY RESTRAINING ORDER REQUEST - DROPBOX / DOWNLOAD.COM / CNET
DISTRIBUTION PATHWAY**

Plaintiff requests immediate temporary restraining relief because the Camila / NXIVM / Bronfman / MediaDefender / Dropbox / Download.com pathway involves potential child-safety, witness-safety, and evidence-integrity concerns that cannot be handled as ordinary civil discovery.

Plaintiff does not ask the Court, civil parties, counsel, clerks, or the public to open, view, copy, or circulate any suspected illegal material. Plaintiff asks the Court to stop further distribution and secure the records through lawful sealed forensic and law-enforcement channels.

Plaintiff asks that no person with notice of the Order distribute, upload, download, index, promote, monetize, mirror, transfer, delete, alter, or destroy any Dropbox-hosted, cloud-hosted, Download.com/CNET-derived, LimeWire-style, P2P, repository, metadata, hash, filename, access-log, upload/download-log, marketing, indexing, or suppression record connected to the Camila / NXIVM / Bronfman pathway.

Plaintiff further asks that Download.com/CNET-related records be preserved because Plaintiff alleges that the historical distribution architecture, reviews, how-to materials, P2P tools, indexing, download pages, links, traffic data, monetization records, and related platform records are central to showing how file-sharing distribution systems operated and who used or benefited from them.

This TRO request is targeted. It does not seek a broad prior restraint on speech. It seeks emergency control of alleged evidence pathways and suspected unlawful material so that records can be preserved without public circulation and reviewed only by qualified authorities.

PERSONAL EMERGENCY STATEMENT

Your Honor,

I am writing this plainly because this is now bigger than me.

We are many victims. Some are deceased. Some are injured. Some are under threat. Some are too afraid to speak. I am asking for the Court's intervention before more evidence disappears and before more people are harmed.

The immediate problem begins with the Nielson / Boies Schiller lie. Scott Nielson and Boies Schiller advanced or repeated the false implication that I was a "sanctioned criminal" in the federal Alfa Nero proceeding before Judge Furman in New York - a case that had nothing to do with me.

That was not my case. I did not own the Alfa Nero. I did not finance it. I did not sell it. I did not seize it. I did not transfer it. I was not sanctioned over it. I was not a broker, buyer, seller, port actor, government actor, or sanctions actor. I had zero substantive role in that yacht dispute.

Yet my name was dragged into it and criminalized.

I deny being a criminal. I deny being an OFAC-sanctioned person. I have no criminal conviction record supporting that label. I am not a rapist. I am not a trafficker. I am not the criminal caricature that has been painted of me.

I am not claiming to be perfect. I have made mistakes in life like any other person. But I believe in justice through evidence, due process, and the rule of law. People should be judged by facts, records, and proof - not rumors, labels, coordinated narratives, or guilt by association.

I come from a long line of Cypriot farmers. I was raised to believe in God, hard work, personal responsibility, and the sanctity of the earth. Tell the truth. Keep your word. Respect other people. Care for animals. Leave the land better than you found it.

That is still who I am.

In Antigua, I spend much of my time caring for more than eighty rescued animals on a property being lent to me by a friend who has seen the injustice I am facing. Many of these animals were abandoned, neglected, injured, or left to die. I feed them, rehabilitate them, and nurse them back to health. The work is difficult and humbling, but it keeps me grounded.

The animals help create a sustainable cycle through natural manure and soil-enhancement processes that support the land around us. That work is not a luxury or publicity image. It is how I stay steady while defending my name, my life, and my evidence.

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I am a cognitively disabled man who built a substantial asset pool through media, technology, streaming, hologram, wellness, and sovereign-facing ventures. I allege that those assets were stripped, diverted, or impaired by competing forces, including members of my own family and related family-office actors. I specifically identify my sister Alexia David, her husband Dani Peretz, Bronfman-family pathways, and my cousin Christo Leventis as persons or pathways requiring preservation, custodian identification, and discovery concerning asset control, trust structures, legal instructions, communications, payments, transfers, and reputational attacks.

My evidence will show that I have tried to do everything by the book. I went to courts. I reported to authorities. I preserved records. I used public filings, evidence bundles, and lawful channels rather than private retaliation.

At the same time, assets I built through years of work have disappeared, been diverted, or been impaired under color of law before the real facts were ever adjudicated. I allege that legal process, reputational labeling, disability pressure, family-office control, and litigation machinery were used to strip value while making it appear lawful.

The Alfa Nero matter shows how this happens.

Prime Minister Gaston Browne has publicly stated that I was added to the Alfa Nero narrative even though my only connection was that I rented his Jolly Harbour home. He described the allegations as fabricated and as an attack on him and Antigua and Barbuda. So this is not just me saying I was falsely dragged in. Antigua's own leadership has said the Alfa Nero narrative was being used as national defamation.

Asot Michael brought me to Antigua and introduced me to Prime Minister Browne. That is the true origin of my Antigua connection.

Asot later told me that high-profile lawyers and powerful interests were after him. He asked me for help. He connected me with people because he hoped I could help him protect the record and understand what was happening around him.

Asot was later killed.

I am not asking this Court to adjudicate Asot Michael's murder. I am telling the Court why this is not ordinary civil litigation to me. Witness safety, source protection, chain of custody, intimidation, and evidence loss are real.

Daphne Barak told me on three separate occasions, in multiple conversations, that Asot Michael owed her \$1.5 million. She was brought into my life through actor Corey Feldman. I also identify Corey Feldman and Brandon Howard as witnesses or relationship-pathway persons connected to Barak's media, entertainment, and politically charged transaction network.

I am working with Leon Symister in Antigua, counsel connected to one of the alleged accused persons, and with CID-related channels to better understand the facts surrounding Asot Michael's death. I am also working with Everton Jeffers, the head of police in Antigua, and CID officers to understand what I believe is an organized assault on Antigua, its leadership, its reputation, and persons connected to the Alfa Nero / Asot Michael / sovereign-interest pathway.

I have direct proof and witness-safety materials that I believe connect Daphne Barak, David Boies / Boies Schiller-related actors, and aligned intermediaries to the Antigua / Alfa Nero / media-pressure pathway Asot feared. Because these materials involve witness safety, potential criminal issues, and sensitive source protection, I respectfully request leave to submit them under seal or in camera, and to have appropriate materials referred to qualified law-enforcement authorities for lawful review.

I also identify Sean "Diddy" Combs, Jonathan Hay, Chastity Jones, Joseph Chora, Anthony Pellicano, Danny Kapon, and the deaths of Aaron Cain McKnight and my attorney Mark J. Lieberman in Dallas as related preservation and witness-safety pathways.

I identify Jonathan Hay as a material witness. After I published the ShockYa article concerning Hay's role as "John Doe" in a Sean "Diddy" Combs-related lawsuit, multiple people contacted me after many years with additional information, witness leads, and corroborating materials. Hay's witness knowledge, communications, source materials, and Dallas-related statements should be preserved and reviewed through lawful process.

I identify Ryan Baker as a material witness. Baker represented me in major FilmOn, DoubleVerify, Supreme Court, and CBSi-related matters, and I believe Baker has relevant knowledge concerning the Dallas / Aaron Cain McKnight witness-safety pathway. I request preservation of Baker's non-privileged files, communications, notes, call records, emails, witness contacts, and related materials.

I allege that Combs and affiliated entities benefited from or misappropriated technology, patent, likeness, media, hologram, or entertainment-industry assets connected to my work. I further allege that Jonathan Hay, Chastity Jones,

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Joseph Chora, Anthony Pellicano, Danny Kapon, and related intermediaries appear within overlapping entertainment, business, media, witness, intimidation, enforcement, and asset-control pathways requiring preservation and review.

I am saying this plainly because this is how it has come to me through witnesses, records, threats, and fear. These are not abstract names to me. They appear in the same intimidation, reputation-management, witness-pressure, and intermediary pathways that keep coming back around my cases, my family, my assets, and the people trying to help me.

I further identify Joseph Chora because I am informed and believe there were threats, pressure, intimidation, or disputes involving my attorney Mark J. Lieberman shortly before his death. I am not asking this Court to solve Mark's death in this civil case. I am asking the Court to preserve the records before they disappear.

I further request immediate preservation of all CCTV footage, security-camera recordings, court security logs, incident reports, entry and exit records, witness statements, and related materials concerning the assault on me in Sir Barry Paul Cotter's court on July 25.

I allege that I was assaulted by attorney Ajay Founellier and that the incident was witnessed by two CPS officers identified to me as Officers 10 and 26. I respectfully request that the identities of those officers be preserved, that their notes and observations be secured, and that all related footage and records be immediately preserved before they are overwritten, deleted, altered, or lost.

I further identify the NXIVM / Camila / Bronfman pathway as a public-record and sealed forensic issue. Federal prosecutors brought child-exploitation-related charges against Keith Raniere, and Camila-related evidence became part of the federal criminal record. I have also preserved filename inventories showing repeated "Camila" references inside P2P-style and cloud/distribution naming patterns, including "Kely & Camila," "camila14," "camilacamila," and embedded variants.

I do not ask any civil party, clerk, or court staff to open, view, copy, or circulate any suspected illegal material. My concern is the distribution architecture: filenames, hashes, metadata, Dropbox/cloud repositories, Download.com / CNET distribution records, LimeWire-style file-sharing pathways, marketing or indexing systems, access logs, upload/download histories, repository ownership, and suppression records. Those records can show who stored, promoted, indexed, monetized, suppressed, or distributed materials without exposing anyone to prohibited content.

This is why preservation alone is not enough.

I respectfully ask for real protective action.

I ask the Court to permit sealed or in camera submission of witness-safety, victim-safety, CSAM-related, trafficking-related, intimidation-related, Alfa Nero-related, Asot Michael-related, court-assault-related, Download.com/CNET-related, Dropbox/cloud-repository-related, and cross-border evidence.

I ask the Court to refer appropriate sealed materials to the FBI, Homeland Security Investigations, Dallas law enforcement, Antigua CID, child-protection authorities, cybercrime units, or any other proper authority.

I ask the Court to order immediate identification of custodians, repositories, devices, cloud accounts, Dropbox accounts, law-firm files, metadata, communications, payment records, family-office records, retainer materials, platform records, court-security records, CCTV footage, Download.com/CNET distribution records, and source materials relevant to these emergency concerns.

I ask the Court to suspend deletion, wiping, auto-destruction, alteration, transfer, sale, distribution, linking, reposting, indexing, or destruction of those materials and to require sworn certification of compliance before further proceedings.

I ask the Court to prohibit intimidation, retaliation, harassment, coercion, or pressure directed at witnesses, victims, family members, reporting sources, or persons assisting with lawful preservation.

ADDITIONAL REQUEST FOR INTER-COURT ASSISTANCE

Because the false criminal labeling and related allegations originate from, appear in, or were repeated in the Alfa Nero-related proceedings in the Southern District of New York before Judge Jesse M. Furman, I respectfully request that this Court seek appropriate inter-court assistance, or otherwise authorize such process as the Court deems proper, to obtain any records, filings, transcripts, exhibits, sealed materials, sealed evidence, or other materials in those proceedings that mention or relate to me, Alkiviades David / Alki David.

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I respectfully request that any such materials be unsealed only as appropriate, protected where necessary, and transmitted or made available to this Court for use in this litigation, subject to any protective order this Court or the SDNY may require.

This inter-district assistance is necessary so that the truth concerning the Nielson / Boies Schiller statements, my lack of involvement in the Alfa Nero matter, and the surrounding reputational, witness-safety, and asset issues can be properly tested in this forum as part of the multi-jurisdictional facts at issue.

I am not asking this Court to rule on the SDNY matter or to disturb Judge Furman's orders. I am asking only that relevant records not remain siloed across districts while my name, safety, assets, and access to justice remain impaired.

For years I have published evidence, witness leads, and preservation records through Shockya.com, CBSYOUSUCK.com, and submissions to authorities worldwide. I did this because I believed evidence was being buried and victims were not being heard. Instead of protection, I have faced reputational destruction, legal pressure, witness intimidation, disability exploitation, asset interference, and what I believe to be a perversion of justice.

Living in Antigua has taught me to turn the other cheek, but keep account of the damage.

I am not asking for revenge. I am asking for lawful protection.

I am not asking the Court to believe every allegation today. I am asking the Court to preserve the record, protect witnesses, allow sealed review, obtain relevant inter-court records, restrain further Dropbox/Download.com-related distribution of sensitive evidence pathways, and let the truth be tested before evidence disappears.

If I am wrong, preserved evidence will show that.

But if the evidence is deleted, altered, transferred, wiped, hidden, sealed away, redistributed, or destroyed before review, then neither I nor this Court will ever be able to test the truth.

Respectfully submitted,

/s/ Alkiviades David

Alkiviades David, Pro Se

[Address / contact information on file]

Date: May 30, 2026

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PROPOSED ORDER

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TEXAS

SHERMAN DIVISION

**[PROPOSED] TEMPORARY RESTRAINING AND PRESERVATION ORDER ON
EMERGENCY SUPPLEMENT TO DKT. 28**

Before the Court is Plaintiff Alkiviades David's Emergency Supplement to Dkt. 28 requesting preservation of evidence, temporary restraining relief, sealed/in camera submission, law-enforcement referral, protective relief, and inter-court assistance. Having considered the filing, the Court ORDERS as follows:

1. Plaintiff may submit sensitive witness-safety, victim-safety, CSAM-related, trafficking-related, intimidation-related, Alfa Nero-related, Asot Michael-related, court-assault-related, Download.com/CNET-related, Dropbox/cloud-repository-related, cross-border, and related materials under seal or in camera, subject to further order.
2. No party, counsel, custodian, platform, repository holder, or person with notice of this Order shall delete, wipe, alter, transfer, sell, conceal, destroy, redistribute, upload, download, mirror, link to, index, promote, monetize, or permit routine auto-destruction of records, devices, files, cloud accounts, Dropbox accounts, Download.com/CNET distribution records, metadata, communications, payment records, source files, hashes, filenames, access logs, upload/download logs, repository ownership records, or suppression records relevant to the matters identified in Plaintiff's emergency filing.
3. No suspected child-exploitation material or potentially prohibited material shall be opened, copied, circulated, attached publicly, or reviewed by civil parties except through lawful sealed forensic, law-enforcement, or Court-authorized procedures.
4. Any person or entity with custody or control of relevant records shall preserve source files, metadata, hashes, access logs, upload/download logs, communications, drafts, filings, declarations, media contacts, payment records, retainer materials, family-office materials, platform records, court-security records, CCTV footage, Download.com/CNET records, Dropbox/cloud records, and related non-privileged factual materials.
5. Within seven days of this Order, relevant parties and custodians who receive notice shall certify preservation steps taken and identify, to the extent known, the custodians, repositories, devices, accounts, retention systems, and auto-delete policies implicated by this Order.
6. The Court authorizes appropriate inter-court assistance, or such process as may be necessary, to request from the Southern District of New York records, filings, transcripts, exhibits, sealed materials, sealed evidence, or other materials in Alfa Nero / Furman proceedings that mention or relate to Alkiviades David / Alki David.
7. The Court may, if appropriate, refer sealed materials to the FBI, Homeland Security Investigations, Dallas law enforcement, Antigua CID, child-protection authorities, cybercrime units, or any other proper law-enforcement or safeguarding authority.
8. This Order makes no merits findings and does not adjudicate any criminal allegation, foreign proceeding, SDNY matter, or third-party claim. It is entered solely to restrain further distribution or destruction of sensitive evidence pathways, preserve evidence, protect the record, and permit lawful review.
9. All other relief is reserved pending further order of the Court.

SO ORDERED.

Date: _____

UNITED STATES DISTRICT JUDGE

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EXHIBIT INDEX / PRESERVATION ROADMAP

Exhibit A: Dkt. 28 and related leave-to-amend materials - supports procedural posture and request for emergency review.

Exhibit B: SDNY Alfa Nero / Furman record - records, filings, sealed materials, transcripts, exhibits, declarations, and communications mentioning Alkiviades David / Alki David.

Exhibit C: Antigua / Prime Minister Gaston Browne transcript - supports national-defamation and false Alfa Nero association context.

Exhibit D: DOJ NXIVM / Camila public-record materials - supports sealed forensic and law-enforcement handling.

Exhibit E: Camila / NXIVM / Bronfman filename inventory - data-only inventory; no civil party is asked to open or view suspected prohibited material.

Exhibit F: Download.com / CNET / LimeWire-style distribution architecture records - listings, download links, how-to guides, reviews, traffic data, monetization, indexing, and platform records.

Exhibit G: Dropbox / cloud repository records - hashes, metadata, repository ownership, access logs, upload/download logs, links, mirrors, suppression/takedown records, and account records.

Exhibit H: ShockYa / Jonathan Hay article and witness-trigger materials - records showing post-publication witness contacts and Dallas-related leads.

Exhibit I: Asot Michael / Antigua CID / witness-safety materials - sealed or in camera only.

Exhibit J: Court-assault CCTV request - Sir Barry Paul Cotter court, July 25, attorney Ajay Founellier allegation, CPS Officers 10 and 26.

Exhibit K: Ryan Baker witness and custodian materials - FilmOn, DoubleVerify, Supreme Court, CBSi, and Dallas/Aaron Cain McKnight pathways.