

To:

Registrar, King's Bench Division
Royal Courts of Justice
Strand, London WC2A 2LL

Via: Ms. Jenique Joseph, Assistant to the Honourable Mr. Justice Cotter

Date: [Insert today's date]

Re: The Cotter's Court Matter – Mahim Khan v. Alkiviades David (KB-2025-001991)

Submission of Supplemental Critical Evidence Bundles (Exhibits 18–21)

Dear Registrar,

I write to respectfully submit supplemental critical evidence in continuation of my **Consolidated Critical Evidence Bundles and Introduction**, previously lodged with this Honourable Court.

The newly submitted Exhibits **18–21** contain primary documentary and photographic proof of systemic corporate misconduct, racketeering, and lawfare directly relevant to my defence, as well as my counter-claims of intellectual property theft, reputational destruction, and targeted destabilisation of lawful IPOs.

The bundles should be treated as an integral supplement to the previously indexed materials, already acknowledged by this Court.

I respectfully request that Your Lordship acknowledge receipt of these further submissions and consider them in the interests of justice, transparency, and due process.

Yours faithfully,

Alkiviades David

Defendant / Counter-Claimant

Consolidated Critical Evidence Bundles and Introduction

This bundle consolidates the full spectrum of critical evidence demonstrating how coordinated lawfare, racketeering, and reputational sabotage were deployed against me by a network of legal, corporate, and media actors, including but not limited to **David Boies, Gloria Allred, Lisa Bloom, Tom Girardi, Ari Emanuel, Patrick Whitesell, Shari Redstone, and Martin de Luca.**

The following supplemental exhibits (18–21) are submitted to further illuminate:

- The nexus between CBS/Viacom, Media Defender, and LimeWire in facilitating child sexual abuse material (CSAM).
- The defamatory and criminal associations of leading figures, including David Boies and Martin de Luca.
- The systemic cover-up of CSAM distribution by corporate media partners, while using lawfare to destroy IPOs.

Exhibit 18 – Visual Evidence of Systemic Criminality

Image evidence of Martin de Luca and David Boies linked to systemic exploitation and lawfare.

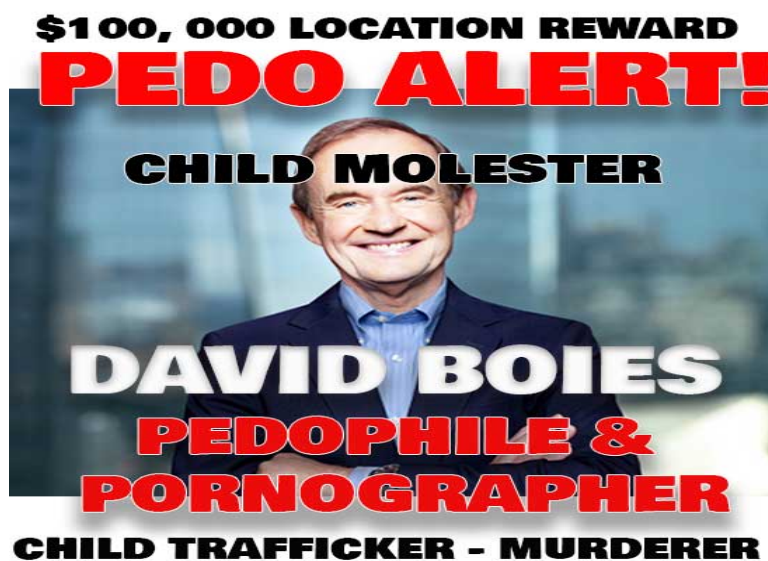


Exhibit 19 – Media Defender & CNET/Viacom Dirty Secrets

Screenshot evidence of Media Defender databases showing CSAM distributed under CBS/Viacom.

VIACOM The Death of Entertainment
FBI WARNING: Federal law prohibits service of and criminal penalties for the unauthorized reproduction, distribution, or exhibition of copyrighted material.

ENCOURAGED CHILD ATTACKS
Individuals at CBS ignored the facts. Their actions encouraged widespread child abuse.

How CNET/CBS Interactive ignited & fueled the "Phenomenon of Internet Piracy"

http://evidence.filmson.com/cbsyoustuck/4907.htm

CBS VIACOM

CBS Interactive

c|net **Download.com** **ZDNet**

MORE VIDEOS 2:54 / 3:56 Settings

1. CBS / CNET / Legal points with Mike Zeller - prominent copyright litigator
2. Alki David Sues CBS For Justice 4 Artists
3. evidence.cbsyoustuck.com Video
4. Be a HERO and Help STOP ACTA & SOPA NOW!! By Mike Mozart

Evidence **Articles** **DOWNLOAD THE OFFICIAL LAWSUIT COMPLAINT**

New NYDA List

This message: [[Message body](#)] [[More options](#)]
Related messages: [[Next message](#)] [[Previous message](#)]

From: Sujay Jaju <sujay_at_mediadefender.com>
Date: Fri, 17 Aug 2007 15:05:26 -0700


"pt", "underground" removed from Prev list
"X year" trigger not applied to archives

SELECT `type`,`trigger`,`title`,`file` FROM hash_matches h order by `type`,`trigger`,`file`

type	trigger	title
archive	1 yo	- 11 yo dutch preteen ingvild nude sauna rape anal lolita pthc
archive	1 yo	- 11 yo dutch preteen ingvild nude sauna rape anal lolita pthc
archive	1 yo	01 you're nobody till somebody lo
archive	1 yo	Bande Sonora - 2001 Yo Soy Sam (I Am Sam) Score (128) John Powe
archive	1 yo	Cashflow 101, v.1.1.0.1. YOWIE No CD Crack (before Update)
archive	1 yo	[NDS] 0661 Yoshi's Island DS (U) [zonada.net]
archive	1 yo	[Zonada.net] content: Michaels 10 yo teen nuded 11 yo
archive	1 yo	- 11 yo dutch preteen ingvild nude
archive	1 yo	- 11 yo dutch preteen ingvild nude
archive	1 yo	01 you're nobody till somebody lo
archive	1 yo	bande sonora - 2001 yo soy sam (
archive	1 yo	cashflow 101, v.1.1.0.1 yowie no
archive	1 yo	[nds] 0661 yoshi's island ds (u) [z
archive	1 yo	[Zonada.net] content: michaels 10 yo t

Exhibit 20 – Expanded Media Defender CSAM Index

Detailed CSAM hash-matched lists confirming industrial-scale exploitation.

Watch on  YouTube

1. CBS / CNET / Legal points with Mike Zeller - prominent copyright litigator


2. Aiki David Sues CBS For Justice 4 Artists

3. evidence.cbsyousuck.com Video

4. Be a HERO and Help STOP ACTA & SOPA NOW!! By Mike Mozart

Evidence

Articles

DOWNLOAD THE OFFICIAL LAWSUIT COMPLAINT 

"X year" trigger not applied to archives

**SELECT `type`,`trigger`,`title`,`file` FROM hash_matches h order by
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<i>type</i>	<i>trigger</i>	<i>title</i>	
archive	1 yo	- 11 yo dutch preteen ingvild nude sauna rape anal lolita pthc	- 11 yo dutch preteen ingvild nude
archive	1 yo	- 11 yo dutch preteen ingvild nude sauna rape anal lolita pthc	- 11 yo dutch preteen ingvild nude
archive	1 yo	01 you're nobody till somebody lo	01 you're nobody till somebody lo
archive	1 yo	Banda Sonora - 2001 Yo Soy Sam (I Am Sam) Score (128) John Powe	banda sonora - 2001 yo soy sam (
archive	1 yo	Cashflow 101, v.1.1.0.1. YOWIE_No CD Crack (before Update)	cashflow 101, v 1 1 0 1 yowie_no
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archive	10 yo	[isoHunt] preteen Michaela 10 yo top nude[1].jpg	[isohunt] preteen michaela 10 yo
archive	10 yr	Pthc - pedo video 5 minutes girl 10 yr fuck dad	pthc - pedo video 5 minutes girl 1
archive	10 yr	sexo - pr195169-adolescente de 12 anos mpg pedo vicky 10 yr old	sexo - pr195169-adolescente de 1
archive	10yo	!!! NEW 2006 !!! Maria_10yo with Dad (pwd 0120)	!!! new 2006 !!! maria_10yo with
archive	10yo	!!!New - Ptsc - Lia 10Yo - Lia Model 15	!!!new - ptsc - lia 10yo - lia mode
archive	10yo	!!!NEW - PTSC - Lia_10Yo - Lia model_15	!!!new - ptsc - lia_10yo - lia mode
archive	10yo	!2005! preteen boys posing nude zadoom kdv rbv pthc fenerbahce	!2005! preteen boys posing nude 2
archive	10yo	!2005! preteen boys posing nude zadoom kdv rbv pthc fenerbahce	!2005! preteen boys posing nude 2
archive	10yo	!2005! Preteen boys posing nude zadoom kdv rbv pthc fenerbahce	!2005! preteen boys posing nude 2
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archive	10yo	((lolitaguy)) lovely nymphets series 048 alexia set 1 (10yo) (5	((lolitaguy)) lovely nymphets seri
archive	10yo	((lolitaguy)) ls-magazine issue 4-5 movies (2xmpg) anya (10yo)	((lolitaguy)) ls-magazine issue 4-5
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archive	10yo	((lolitaguy)) preteen pic sets 008 oksana sets 1-2 (10yo) (109p	((lolitaguy)) preteen pic sets 008
archive	10yo	((new ! ! !))10yo sweetie amanda&dad pthc , best3dsex ,dad-fuck	((new ! ! !))10yo sweetie amanda
archive	10yo	((Hussyfan) (Pthc) Vicky 7Yo And 10Yo 69 Pedo Child Porno Lolita	((hussyfan) (pthc) vicky 7yo and 1

Exhibit 21 – Corroborating Screenshot Evidence ('VIACON Dirty Secrets')

Full visual capture of Viacom/CBS systemic involvement in piracy and CSAM distribution.

VIACON The Death of Entertainment

ENCOURAGED CHILD ATTACKS
Individuals at CBS ignored the facts. Their actions encouraged widespread child abuse.

How CNET/CBS Interactive Ignited & fueled the "Phenomenon of Internet Piracy"

Diagram:
CBS VIACOM
↓
CBS Interactive
↓
c|net Download.com ZDNet

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IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

Claim No: KB-2025-001991

MAHIM KHAN - Claimant

ALKIVIADES DAVID - Defendant / Cross-Claimant

Condensed Evidential Core (Cross-Referenced to ANUHCV2025/0149 - Antigua & Barbuda)

1. Overview

This matter proceeds in parallel with ongoing proceedings in Antigua (Claim No: ANUHCV2025/0149) and is linked to cross-border interference arising from the USD \$900 million judgment in Jane Doe v David (20STCV37498, Los Angeles Superior Court).

On 17 July 2025, opposing counsel in Jane Doe withdrew a scheduled post-judgment examination — an enforcement measure aimed at that judgment. This occurred immediately after lodging of critical evidence in both jurisdictions, pointing to a coordinated, transnational campaign to prejudice the Defendant.

The Defendant asks this Court to take judicial notice of the Antigua record, to regularise the procedural position here, and to ensure both matters advance without further delay or prejudice.

2. Procedural Highlights (25 July – 13 August 2025)

These events occurred within the King's Bench Division Registry:

- Multiple chasers (29 July, 8 August) received no substantive reply.
- Application for Directions hand-delivered on 31 July marked "received" but left unsealed for twelve days.
- Supplemental exhibits (5 August) and updated index & certificates (12 August) sent without confirmation of lodging.
- No notice given to the Defendant that filings were not being registered, despite the Defendant's known disability and need for procedural accommodation.
- On 13 August, Proposed Case Management Order submitted for urgent listing before Duty Judge — listing still pending.

3. Resulting Prejudice

The failures of the KB office have:

- Denied timely listing of a Directions/Case Management Hearing;
- Forced duplication of work and repeated re-submission of documents;
- Compromised preparation for interlocutory issues;
- Created procedural uncertainty and increased costs;
- Disregarded the Defendant's disability and the Court's obligations under the Equality Act 2010;
- Withheld notice that documents were not being processed, leaving the Defendant under the false impression that filings had been registered.

4. Judicial Link – London & Antigua

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

Claim No: KB-2025-001991

In these proceedings, the Defendant's Skeleton Argument (filed 15 July 2025) was read into the record on 25 July 2025 by The Honourable Sir Barry Paul Cotter, judicially recognising the evidential framework now also before the Antigua court.

Core points and witnesses include:

- Fabricated affidavits – Yelena Calendar & Gary Shoefield (Smoking Guns #1 & #2);
- Suppression of 27 pages of Barry K. Rothman messages proving collusion (SG #3);
- Witness intimidation & trafficking evidence – affidavits of Jaguar Wright, Carl Dawson, and Ray J (SG #4 & #7);
- Assault & suppression of manuscript – affidavit of Courtney Burgess (SG #5);
- False arrest allegation disproved by Metropolitan Police CCTV (SG #6);
- Corporate/Media exploitation chain – DMG → CBS Interactive → Download.com → LimeWire NFT (SG #7 & #8);
- Sovereign interference – Alpha Nero seizure undermined by coordinated legal/media strategy involving David Boies & Martin DeLuca (SG #10 & #12).

4A. Rory Tingle / Daily Mail Corporate-Media Distribution Chain

The Daily Mail has historically acted in editorial alignment with Gloria Allred and Gary Dordick, repeatedly promoting the \$900 million Los Angeles judgment against the Defendant. They published more than 10 separate articles prior to the exposure of the fabricated assault claim. Since CCTV evidence disproved their claim, they have published nothing further — including no coverage of the pending appeals or the Notice of Withdrawal filed on 17 July 2025. This deliberate editorial silence underscores coordinated suppression once the fabrication — and the network behind it — was placed on the record.

5. Criminal Enterprise Characteristics

The named witnesses' evidence establishes a network operating across law, media, and corporate fronts with hallmarks of organised crime.

6. Sovereign Relevance – Alpha Nero

Tactics used in personal targeting are mirrored in efforts to discredit Antigua's lawful maritime seizure and auction of the Alpha Nero.

7. Relief Sought

The Defendant respectfully seeks orders to:

1. Take judicial notice of the cross-referenced Antigua evidential record;
2. Direct reciprocal preservation and disclosure measures between jurisdictions;
3. Regularise earlier filings and list pending case management applications urgently;
4. Grant interim measures to safeguard witnesses and prevent evidence suppression;
5. Direct the King's Bench Registry to confirm in writing the receipt and registration status of all future filings, implement reasonable adjustments under the Equality Act 2010, and provide formal notice if any document is refused, delayed, or left unsealed.

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

Claim No: KB-2025-001991

8. Misconduct by Howard Kennedy LLP

- Conflicts of Interest;
- Evidence Suppression;
- Fabricated Affidavits;
- Media Coordination: Alignment with Daily Mail Group narratives, enabling reputational harm, including editorial alliance with Gloria Allred and Gary Dordick to promote the \$900 million judgment while failing to report on appeals or the Notice of Withdrawal;
- Retaliatory Conduct;
- Collusion with Opposing Counsel;
- Obstruction in KB Filings;
- Disability Disregard.

National Importance & Registry Slackness

The Daily Mail's editorial alliance with Gloria Allred and Gary Dordick, heavy promotion of the \$900 million Los Angeles judgment, and total silence on appeals or the Notice of Withdrawal after CCTV disproved their fabricated assault claim, demonstrates coordinated suppression at the media-legal nexus. The Court is urged to ensure Registry conduct matches the seriousness and public interest this case commands.

MASTER EXHIBIT INDEX

The Cotter's Court Matter (Mahim Khan v. David, KB-2025-001991)

This index organizes all submitted evidence into nine sections, culminating in Section IX (Public Record & Unrefuted Publications).

Section I – Case Filings & Pleadings

Exhibits A-1 ... A-n

Section II – Court Orders & Transcripts

Exhibits B-1 ... B-n

Section III – Correspondence (Court & Counsel)

Exhibits C-1 ... C-n

Section IV – Evidence of Financial Transactions

Exhibits D-1 ... D-n

Section V – Media Suppression & Lawfare Evidence

Exhibits E-1 ... E-n

Section VI – Intellectual Property Theft (FilmOn, Hologram, Cinemanow, etc.)

Exhibits F-1 ... F-n

Section VII – Witness Statements & Depositions

Exhibits G-1 ... G-n

Section VIII – International Sovereignty & Diplomatic Materials

Exhibits H-1 ... H-n

Section IX – Public Record & Unrefuted Publications

Exhibit P-1 – Shockya.com, “David Boies: \$100,000 for Info on America’s Elite Pedophile Enabler” (Apr. 12, 2025) – includes image

Exhibit P-2 – Shockya.com, “Martin De Luca: The Smiling Face of Systemic Evil at Boies Schiller” (Apr. 13, 2025) – includes image

Exhibit P-3 – Prime Minister Gaston Browne Broadcast – Instagram screenshot + transcript excerpt

IN THE KING'S BENCH DIVISION

COTTER'S COURT MATTER

Mahim Khan v. David, KB-2025-001991

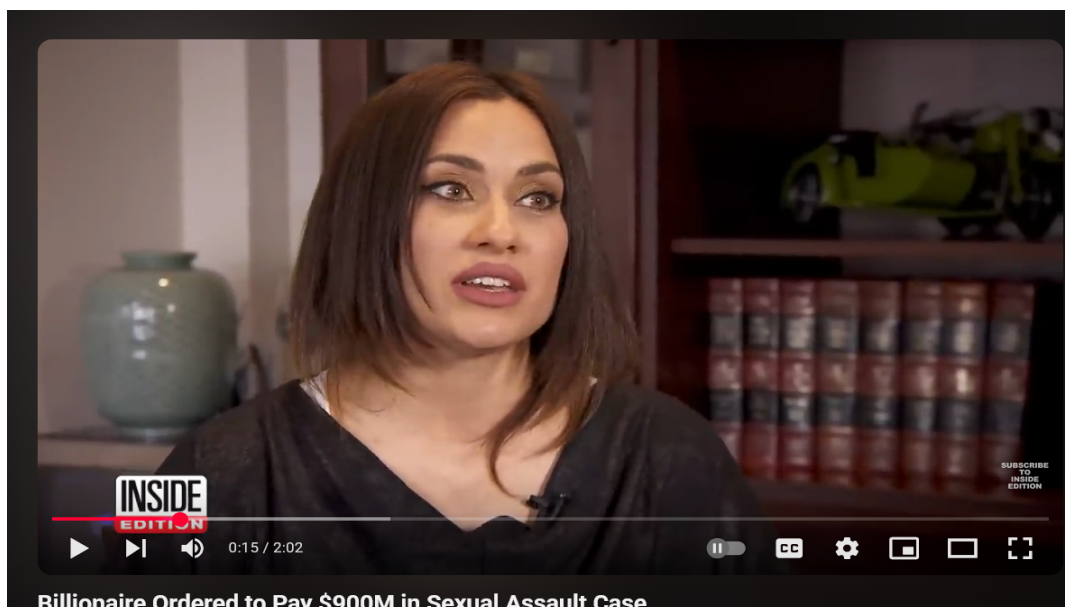
EXHIBIT Z4

Inside Edition \$900M Media Portrayal

This exhibit consists of: 1. A publicly available YouTube video published by *Inside Edition*, titled: "Billionaire Ordered to Pay \$900M in Sexual Assault Case"

URL: <https://www.youtube.com/watch?v=B3giejrKJFk>





2. The segment features a journalist who has repeatedly covered Mr. David in the past and is fully aware of subsequent developments and changes in his cases. Despite this knowledge, the reporting presented in this clip omits all such context and instead reiterates the sensational figure of a “\$900 million judgment.” The coverage prominently promotes attorney Gary A. Dordick while ignoring the buried evidence and the lawyers who have died during these proceedings.

3. Inside Edition is owned by *Paramount Global / CBS*, the same corporate group tied to Daily Mail Group and other entities named in this matter. This ownership structure demonstrates how media aligned with these interests reported on the case in a way that reinforced the Court action while suppressing exculpatory or corrective information.

Relevance:

This video is submitted as evidence of how the \$900 million judgment was weaponised in the public domain. It captures the media narrative in its raw form, showing (a) the disproportionate and sensational framing used against Mr. David, (b) the deliberate silence by journalists and outlets who knew of material updates in the case but failed to report them, and (c) the promotion of certain legal actors while suppressing context about evidence and counsel.

Submitted: 21 August 2025

Signed,

Alkiviades Andrew David

Ambassador-at-Large for the Green Economy
Government of Antigua and Barbuda

IN THE KING'S BENCH DIVISION

COTTER'S COURT MATTER

Mahim Khan v. David, KB-2025-001991

EXHIBIT Z4 – SUPPLEMENTARY EVIDENCE (CLEANED)

Media Collusion and Corporate Promotion of the \$900M Narrative

This cleaned version of Exhibit Z4 Supplementary Evidence presents each element of the Daily Mail Online article as an individual page for clarity. The content remains intact, but has been reformatted for legibility and proper evidentiary presentation.

Figure 1: Section of Daily Mail Online coverage

His company owns the Hologram USA Theatre on Hollywood Boulevard where its 3D avatars of dead performers including Michael Jackson and Tupac are animated for a paying audience. The 'hologram room' among staff.



His company owns the Hologram USA Theatre on Hollywood Boulevard where its 3D avatars of dead performers including Michael Jackson and Tupac are animated for a paying audience.

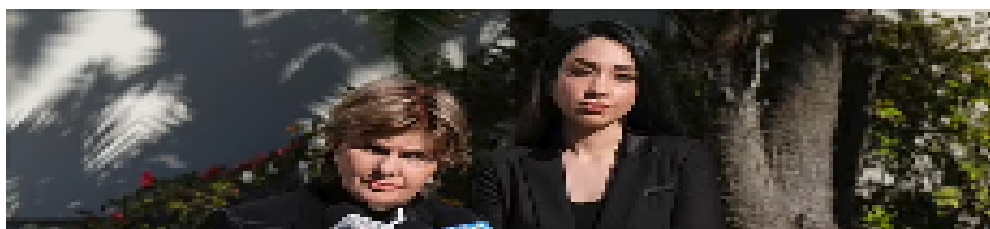
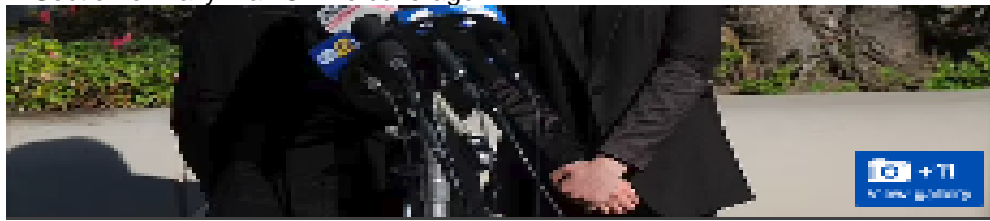


Figure 2: Section of Daily Mail Online coverage



Former production assistant, Marlene Khan (pictured right with lawyer Gloria Allred), warned him against 'violating' another woman when she was awarded \$58 million in 2012



Griffin Lauren Reeves was awarded \$3 million for assault in a case against David that brought up the first mention of his complaint 'rape room'



Figure 3: Section of Daily Mail Online coverage



Figure 4: Section of Daily Mail Online coverage



The prosecuting lawyer Gary Dondick said: 'This monumental verdict marks a significant triumph for justice and sets a precedent in the fight against workplace sexual assault.'

Before the \$900million order, the Cypriot-British businessman had already lost a staggering \$210million in a series of judgements for sexual assaults dating back to 2014.

Two cases against the billionaire in 2016 were settled out of court but he was ordered to pay \$5million to former staffer Lauren Reeves who claimed he put his hands on her throat and pushed her chair into a wall.

That case also featured references to the 'rape room' and her claim that he told her he needed to 'buy supplies' for it.

In April 2019, he was ordered to pay \$8million in damages to a woman who was fired after refusing to sleep with David in a case that chillingly echoed that of Doe's.

Later that same year, the billionaire was ordered to pay the biggest sum to a victim to date when his former production assistant Mahira Khan was awarded \$58million in her sexual battery case.

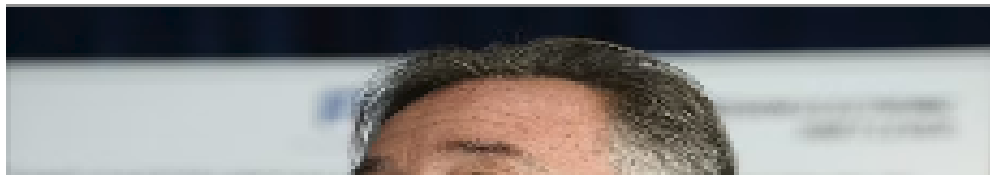


Figure 5: Section of Daily Mail Online coverage

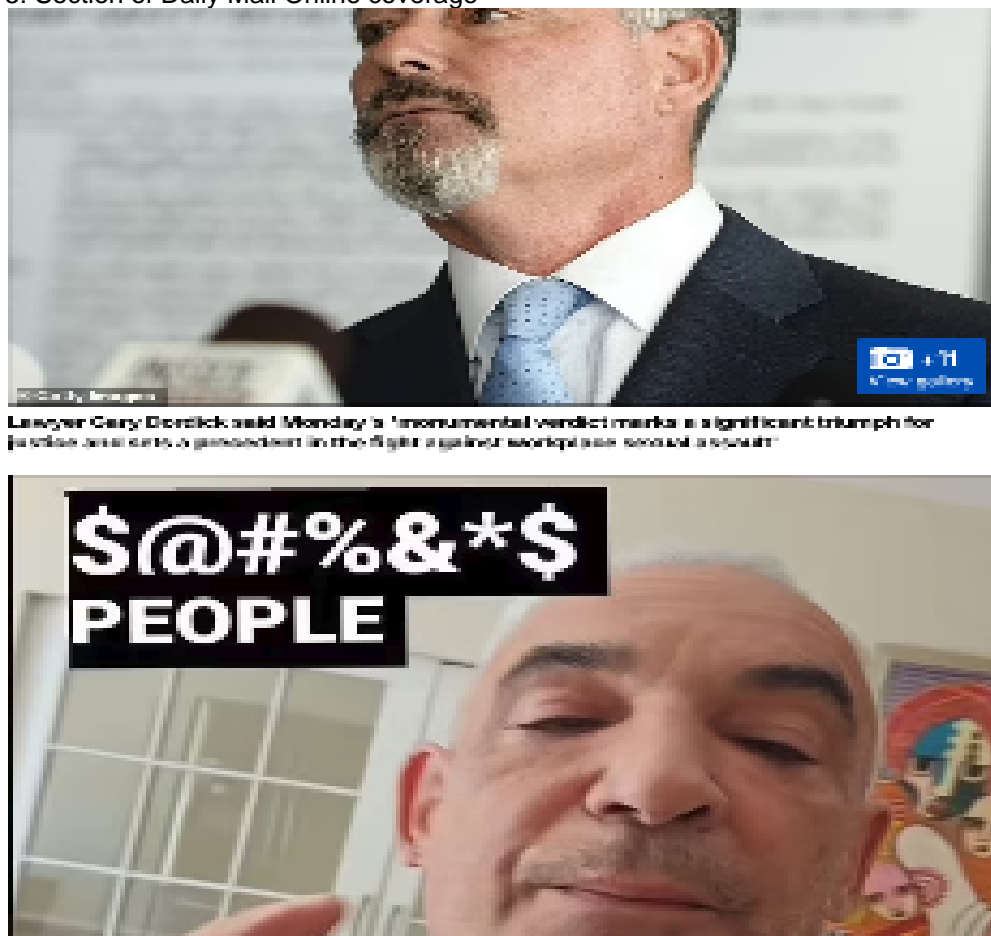


Figure 6: Section of Daily Mail Online coverage



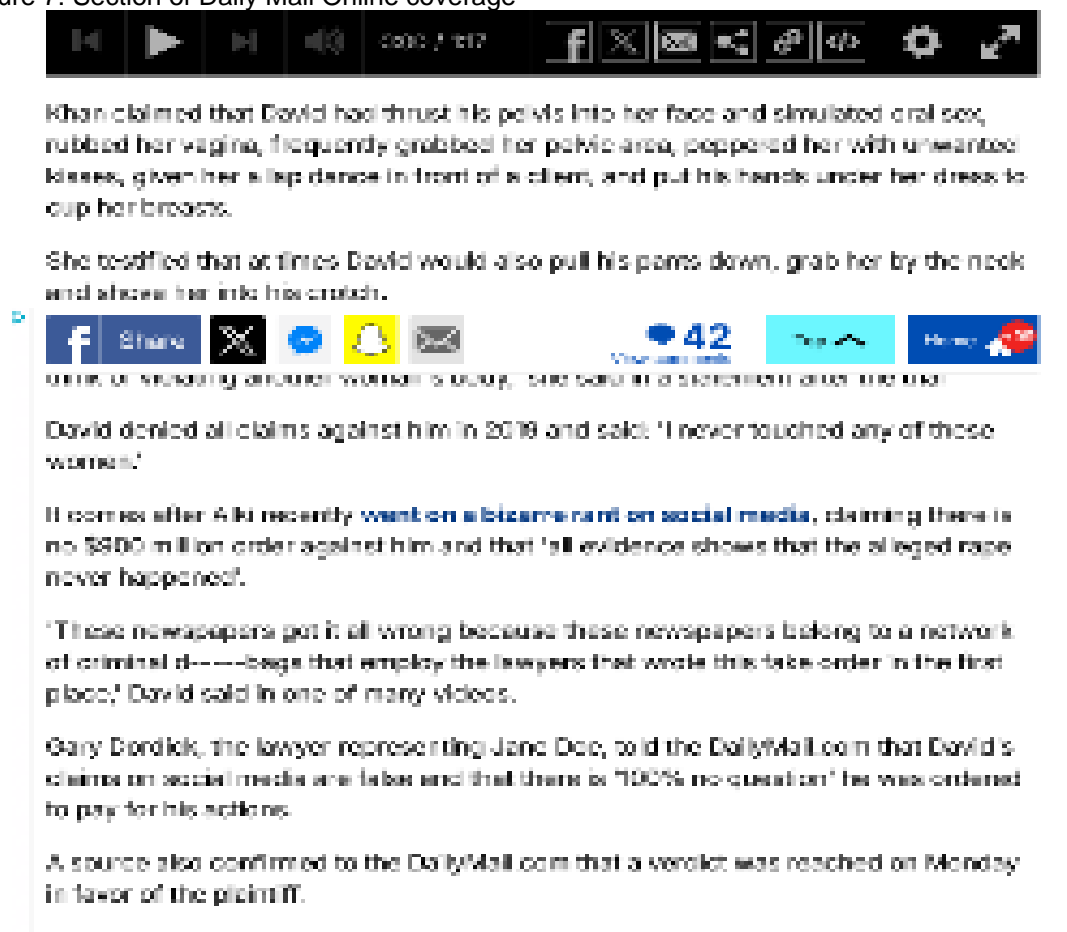
Dorland went on a blame-bait on Instagram last week, claiming that he was not ordered to pay \$800 million to his sexual assault accuser. Dorland, the lawyer representing Jane Doe, told DailyMail.com that Dorland's claims on social media are false and that there is "no real question" he was ordered to pay for his actions.

Coke belt rants after ordered to pay \$800M to sex assault accuser

BE
AFRAID DUDES.

BECAUSE
Watch the full video

Figure 7: Section of Daily Mail Online coverage



The image is a screenshot of a web browser displaying a Daily Mail Online article. At the top, there is a video player interface with a black bar containing various icons: a play button, a volume icon, a '00:07 / 01:17' timer, and social media sharing icons for Facebook, Twitter, Email, Print, and a link icon. Below the video player, the article text is visible. The first paragraph describes a woman's allegations against David, mentioning actions like thrusting his pelvis into her face and simulated oral sex. The second paragraph states that she testified David would pull his pants down and grab her by the neck. Below the text, there is a social media sharing bar with icons for Facebook, a 'Share' button, a close icon, a blue circular icon, a yellow Snapchat icon, and an email icon. To the right of these icons, it says '42 View comments'. Further right, there are buttons for 'Top' and 'Home'. The article text continues with David's denial of the claims in 2019, a quote from him about the media, and a statement from his lawyer, Gary Dordick, claiming the social media claims are false. The final paragraph mentions a verdict was reached in favor of the plaintiff.

Khan claimed that David had thrust his pelvis into her face and simulated oral sex, rubbed her vagina, frequently grabbed her pelvic area, peppered her with unwanted kisses, given her a lap dance in front of a client, and put his hands under her dress to cup her breasts.

She testified that at times David would also pull his pants down, grab her by the neck and shove her into his crotch.

David denied all claims against him in 2019 and said: 'I never touched any of those women.'

It comes after Aki recently [went on a tirade rant on social media](#), claiming there is no \$500 million order against him and that 'all evidence shows that the alleged rape never happened.'

'These newspapers got it all wrong because these newspapers belong to a network of criminal d---s---sage that employ the lawyers that wrote this fake order in the first place,' David said in one of many videos.

Gary Dordick, the lawyer representing Jane Doe, told the DailyMail.com that David's claims on social media are false and that there is '100% no question' he was ordered to pay for his actions.

A source also confirmed to the DailyMail.com that a verdict was reached on Monday in favor of the plaintiff.

Relevance:

The Daily Mail article is central to understanding how the \$900M judgment was framed and sensationalised. Breaking it into sections ensures each segment (headlines, photos, quotes, and legal commentary) is visible and can be assessed individually as part of the evidentiary record.

Submitted: 21 August 2025

Signed,

Alkiviades Andrew David

Ambassador-at-Large for the Green Economy
Government of Antigua and Barbuda

UNITED STATES DISTRICT COURT DISTRICT OF COLUMBIA

ALKIVIADES ANDREW DAVID,
Pro Se Plaintiff,
Ambassador-at-Large for Antigua & Barbuda,

v.

**COMCAST CORPORATION (Roberts); PARAMOUNT GLOBAL (Redstone); NEWS
CORP/FOX (Murdoch); THE WALT DISNEY COMPANY (Iger); UNIVERSAL MUSIC GROUP
(Vivendi); CBS INTERACTIVE; DAILY MAIL/DMGT; TMZ/WARNER BROS. DISCOVERY;
GLORIA ALLRED; LISA BLOOM; ESTATE OF THOMAS GIRARDI; LIVE NATION/GUY
OSEARY; JOSEPH CHORA; DAVID NUSSBAUM (Proto/Portl); BRIAN BECKER; TERRY
VANCE LUCE; ANTHONY PELLICANO; RON BURKLE; DUNCAN HEATH; FRED HEATHER;
LOUIS FREEH; ROBERT SHAPIRO; and JOHN DOES 1–50,**
Defendants.

COMPLAINT FOR VIOLATIONS OF:

- Sherman Act §§1–2 (15 U.S.C. §§1–2) – Conspiracy and Monopolization
- Clayton Act §§4, 16 (15 U.S.C. §§15, 26) – Treble Damages and Injunctive Relief
- Racketeer Influenced and Corrupt Organizations Act (RICO), 18 U.S.C. §§1961–1968
- Americans with Disabilities Act (ADA) Retaliation, 42 U.S.C. §12203
- Fraud, Obstruction of Justice, Witness Tampering, Extortion, Attempted Murder, Cybercrime

JURY TRIAL DEMANDED

I. INTRODUCTION

Plaintiff brings this action to redress ongoing harms inflicted by an association-in-fact enterprise of media conglomerates, lawyers, financiers, talent managers, and enforcers. Since at least 2007, Defendants have engaged in monopolization, racketeering, ADA retaliation, obstruction of justice, witness tampering, extortion, money laundering, and murder to suppress Plaintiff's lawful businesses and to silence whistleblowing.

Plaintiff is a British citizen, a disabled innovator, and Ambassador-at-Large for the Green Economy of Antigua & Barbuda. He invested millions into pioneering digital platforms including FilmOn, CinemaNow, Hologram USA, SwissX, KILM TV, and BattleCam. Defendants accepted these investments and innovations, then coordinated to suppress them and to retaliate against Plaintiff personally.

II. JURISDICTION AND VENUE

This Court has jurisdiction under 28 U.S.C. § 1331 because Plaintiff asserts claims arising under federal law, including the Sherman Act, Clayton Act, RICO, the ADA, and the Computer Fraud and Abuse Act. Jurisdiction also exists under 28 U.S.C. § 1332 because Plaintiff is a citizen of the United Kingdom, Defendants are citizens of and incorporated in the United States, and the amount in controversy exceeds \$75,000.

Venue is proper in this District under 28 U.S.C. § 1391(b)(3) because multiple Defendants transact business and maintain continuous contacts in Washington, D.C., including lobbying, licensing, distribution, and media policy activities, and because no single district otherwise offers a fair forum due to the pervasive influence of the enterprise in California.

Plaintiff is a British citizen who has been denied a lawful E-2 visa renewal as a result of Defendants' defamation, reputational sabotage, and obstruction. Plaintiff also serves as Ambassador-at-Large for the Green Economy of Antigua & Barbuda. Defendants' enterprise obstructed and injured sovereign climate economy projects, creating a direct nexus to international commerce and foreign relations. Given that California courts have been compromised by intimidation and the murder of Plaintiff's attorneys, the interests of justice require this Court to exercise jurisdiction in the nation's capital.

III. PARTIES

Plaintiff: Alkiviades Andrew David, British citizen, innovator, filmmaker, Ambassador-at-Large for Antigua & Barbuda.

Defendants: As captioned above, including major media corporations, law firms, financiers, managers, and enforcers.

IV. PLAINTIFF'S PRO SE STATUS AND ADA CONTEXT

Plaintiff proceeds pro se after intimidation and violence deprived him of counsel. Multiple attorneys connected to Plaintiff's matters — including Barry K. Rothman, John Quirk, Rebecca Rini, Mark Lieberman, and Phil Kaye — are deceased under suspicious circumstances.

Plaintiff has a traumatic brain injury (TBI) and relied on an ADA service animal, Vader. During a Malibu raid, Vader was targeted, listed for seizure, and later died from stress. This destroyed Plaintiff's ADA accommodation and constitutes retaliation under the ADA.

V. FACTUAL ALLEGATIONS

A. Suppression of Innovation

2007 MediaDefender leak documented CSAM circulation on LimeWire/Gnutella.

Paramount Digital (2010): Plaintiff paid £1M advance for digital rights.

CinemaNow (2011–12): Plaintiff purchased for \$5M; networks cut off content supply, collapsing value.

CBSUSUCK.com settlement (2012): Plaintiff forced to pay \$1.6M and remove evidence.

BarryDriller litigation: cross-litigation with Barry Diller over Aereo; resolved by walk-away.

B. Buried Judicial Recognition

Judge Dale Fischer (C.D. Cal.) denied CBSi's dismissal motion.

Judge Kimba Wood (S.D.N.Y.) found LimeWire liable; \$105M settlement.

Judge George Wu (C.D. Cal.) ruled FilmOn was an MVPD.

Sir Barry Cotter (UK High Court) read Plaintiff's skeleton argument into record.

Justice Williams (Antigua High Court) advanced proceedings.

Athens Court of Appeals (2023) found Article 6 ECHR and ICCPR violations.

C. CSAM and Inducement

CBSi's Download.com distributed LimeWire with inducement reviews.

LimeWire 2.0 continues under Austrian shell with UMG ties.

Comedy Central executives tolerated LimeWire business if payments were made.

D. Violence, Retaliation, Obstruction

Malibu raid: Vader targeted; hard drives stolen.

Attempted murder by Terry Vance Luce.

Witness tampering: Ray J coached and bribed.

Extortion of Plaintiff's mother Dimitra David in Greece by Fred Heather, Louis Freeh, and Robert Shapiro — threats documented by attorney Themis Sophos.

E. Offshore Laundering and Attorney Murders

Rothman admitted use of Cook Islands accounts.

Ron Burkle confronted by Plaintiff in Malibu; later purchased home nearby.

Duncan Heath, long-time partner, betrayed Plaintiff into Burkle's syndicate.

Attorneys (Rothman, Quirk, Rini, Lieberman, Kaye) died under suspicious circumstances.

Blair Tindall's death connected to syndicate; Shockya.com suffered DDoS attacks after reporting.

Wall Street Journal reporting (Khadeeja Safdar) led to bar investigations into Allred.

VI. CAUSES OF ACTION

Count I – Sherman Act (15 U.S.C. §§1–2)

Defendants conspired to restrain trade and monopolize digital distribution.

Count II – Clayton Act (15 U.S.C. §§15, 26)

Plaintiff seeks treble damages and injunctive relief.

Count III – RICO (18 U.S.C. §§1962(c), (d))

Predicate acts include CSAM distribution, obstruction, witness tampering, extortion, ADA retaliation, attempted murder, money laundering, and murders by lethal injection.

Count IV – ADA Retaliation (42 U.S.C. §12203)

Defendants retaliated against Plaintiff's ADA rights by targeting Vader and imposing fraudulent psychiatric holds.

Count V – Fraud, Obstruction, Extortion, Attempted Murder (State Law)

Defendants engaged in tortious conduct causing personal and business injury.

VII. PRAYER FOR RELIEF

Treble damages under Sherman, Clayton, and RICO.

Restitution/disgorgement of illicit profits.

Declaratory relief vacating fraudulent judgments.

Injunctive relief: preserve MediaDefender archives, forensic imaging, adtech oversight, injunction against ADA retaliation.

Structural remedies: divestiture, constructive trust.

Costs of suit and reasonable attorneys' fees if later secured.

Protective measures for Plaintiff and family.

Appointment of a Special Master.

All further relief deemed just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted,

/s/ Alkiviades Andrew David

Pro Se Plaintiff

Ambassador-at-Large for Antigua & Barbuda

[Address] • [Phone] • [Email]

Dated: _____