



IN THE HIGH COURT OF JUSTICE
ANTIGUA & BARBUDA

Submitted Date:24/09/2025 11:48

Case No: ANUHCV2025/0149

Filed Date:24/09/2025 11:49

BETWEEN:

ALKIVIADES ANDREW DAVID

Applicant

and

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

Respondents

AMENDED STATEMENT OF CLAIM

1. Introduction

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

2. The Parties

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

3. Background Facts

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

losses.

4. Fossil Fuel Motive and Conflicts of Interest

7. Many Respondents are directly tied to fossil fuel infrastructure through the banks and corporations they control. These banks (JP Morgan, Citibank, HSBC, UBS, Deutsche Bank, Prudential, ICICI, Wells Fargo, Bank of America) are leading financiers of oil, gas, and coal. Media entities (Paramount, Disney, Fox, Comcast, Sony, Vivendi, Warner) are historically funded through fossil-linked financing syndicates. Sipur Entertainment, controlled by Shari Redstone, receives capital linked to fossil fuel infrastructure.
8. These Defendants had a direct interest in obstructing Antigua's proof-of-concept as a sovereign, carbon-credit-driven economy.

5. Causes of Action

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

6. Particulars of Damage

14. Carbon Credit Losses: USD \$8 billion annually; USD \$80 billion per decade; USD \$400 billion over five decades. Losses caused by obstruction of the Antigua Carbon Registry.
15. Biofuel Production Losses: SwissX B100 biofuel production was delayed by three years due to defamation, causing lost revenues of USD \$1.5 billion over that period, with continuing opportunity losses.
16. Tourism & Investment: Reputational damage caused loss of multi-billion-dollar inflows.
17. Political Harm: Members of the UPP Executive knowingly colluded with foreign cartel actors to undermine sovereign projects for partisan gain.

7. Relief Sought

18. Judgment against Respondents jointly and severally.
19. Damages in excess of USD \$80 billion, plus continuing annual accrual.
20. Declaratory relief affirming Antigua's right to carbon sovereignty.
21. Costs, interest, and such other relief as the Court deems just.

Annex A – Schedule of Defendants

The Respondents include:

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

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

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

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

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

Enforcers/Fixers: Anthony Pellicano.

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

Respectfully submitted,

Digitally signed by:

ALKIVIADES ANDREW DAVID

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

Applicant in Person

Date: September 24, 2025