



KEY CONTRADICTIONS SUMMARY

(Appellant’s Evidence vs Record Relied Upon Below)

Claim No: KB-2025-001991

Appellant: Alkiviades David

PURPOSE

This summary identifies **material contradictions** between:

- the evidential narrative relied upon in the proceedings leading to the contempt finding; and
- the evidence now before the Court.

It is provided to assist the Court in determining whether the finding is **safe at the criminal standard**.



1. WITNESS SUPPORT

RECORD RELIED UPON	EVIDENCE NOW BEFORE THE COURT	IMPACT
Allegations supported by workplace witnesses	Shoefield: no testimony; no support	Corroboration undermined
Witness participation assumed	Calendar: not present; no support	Witness structure unreliable



2. AVAILABILITY OF WITNESSES

RECORD RELIED UPON	EVIDENCE NOW BEFORE THE COURT	IMPACT
Stable witness support implied	Rizzo: “No one is willing to be a witness”	Lack of independent support
Coherent narrative assumed	Rizzo: attempts to secure witnesses	Instability in evidence



3. EVIDENTIAL COMPLETENESS

RECORD RELIED UPON	EVIDENCE NOW BEFORE THE COURT	IMPACT
Court relied on available record	400+ emails not presented	Record incomplete
Defence evidence absent	Evidence existed but unused	Distorted evidential picture



4. PROCEDURAL INTEGRITY

RECORD RELIED UPON	EVIDENCE NOW BEFORE THE COURT	IMPACT
Documents treated as agreed	Garofalo: altered after execution	Integrity compromised
Signatures assumed valid	Signature reused without authority	Reliability in doubt



5. APPELLANT'S PARTICIPATION

RECORD RELIED UPON	EVIDENCE NOW BEFORE THE COURT	IMPACT
Fully able litigant assumed	Medical: cognitive impairment	Participation impaired
No adjustments required	No accommodations provided	Inequality of arms



CUMULATIVE EFFECT

These contradictions demonstrate:

- lack of reliable witness corroboration;
- instability in the evidential narrative;
- incomplete evidential record;
- irregularity affecting document integrity;
- impaired effective participation.



CONCLUSION

At the **criminal standard applicable to contempt**, these contradictions:

create a real and substantial doubt as to the safety of the finding.

The Appellant respectfully submits that the contempt order should be **set aside or reconsidered**.

(End of Summary - 1 Page Document)