

FINAL MASTER CRIMINAL COMPLAINT DOSSIER (UPDATED)

Alkiviades David

Submitted to CID – Antigua and Barbuda

This dossier includes all exhibits including original claim form and court orders.

Exhibit Index

A – ABS Transcript

B–E – Court Orders

F – Original Claim Form (17 April 2025)

Exhibit A – Broadcast Statements

Statements include: fabrication, fishing expedition, extortion framing.

Exhibit B – Court Document

outside of Antigua and Barbuda.

2. The allegations contained in the claim disclose a reasonable cause of action in accordance with the laws of Antigua and Barbuda against the Defendants.

IT IS HEREBY ORDERED THAT:

1. The Claimant and the Honourable Attorney General (as amicus) shall by 15th December 2025 file submissions on whether:
 - A. The court has jurisdiction in the circumstances where none of the defendants appear to reside within the jurisdiction and most of the allegations in the claim appear to relate to acts occurring outside of Antigua and Barbuda.
 - B. The allegations contained in the claim disclose any reasonable causes of action in accordance with the laws of Antigua and Barbuda against the Defendants.
2. The Claimant is barred from filing any other documents in this matter except for the written submissions required by this order, and the Court Office shall refuse to accept the filing of any other documents by the Claimant without leave of this court.
3. The matter is adjourned to 16th January 2026 for further hearing.
4. The shall have carriage of this order.

BY THE COURT
REGISTRAR

Rene Williams
Approved
7.11.2025

Exhibit C – Court Document

except for the v
Office shall refi
Claimant without

3. The matter is adj
4. The shall have ca

Rene Williams
Approved
7.11.2025

Exhibit D – Court Document

**THE EASTERN CARIBBEAN SUPREME COURT
IN THE HIGH COURT OF JUSTICE**

**ANTIGUA AND BARBUDA
CLAIM NOS. ANUHCV2025/0149**

BETWEEN:

ALKIVIADES 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**
- 13. DOES 1-100**

Defendant

SETTLED DRAFT ORDER

**BEFORE: THE HONOURABLE JUSTICE RENE WILLIAMS (IN
CHAMBERS)**

DATED : THE 29th DAY October 2025

ENTERED : THE DAY 2025

APPEARANCES :

UPON THIS CLAIM filed herein on 17th April 2025

AND UPON THE COURT being concerned as to whether:

1. The court has jurisdiction in the circumstances where none of the defendants appear to reside within the jurisdiction and most of the allegations in the claim appear to relate to acts occurring

Exhibit E – Court Document

outside of Antigua and Barbuda.

2. The allegations contained in the claim disclose a reasonable cause of action in accordance with the laws of Antigua and Barbuda against the Defendants.

IT IS HEREBY ORDERED THAT:

1. The Claimant and the Honourable Attorney General (as amicus) shall by 15th December 2025 file submissions on whether:
 - A. The court has jurisdiction in the circumstances where none of the defendants appear to reside within the jurisdiction and most of the allegations in the claim appear to relate to acts occurring outside of Antigua and Barbuda.
 - B. The allegations contained in the claim disclose any reasonable causes of action in accordance with the laws of Antigua and Barbuda against the Defendants.
2. The Claimant is barred from filing any other documents in this matter except for the written submissions required by this order, and the Court Office shall refuse to accept the filing of any other documents by the Claimant without leave of this court.
3. The matter is adjourned to 16th January 2026 for further hearing.
4. The shall have carriage of this order.

BY THE COURT
REGISTRAR

Rene Williams
Approved
7.11.2025

Exhibit F – Original Claim Form (Filed 17 April 2025)

Case Number : ANUHCV2025/0149

IN THE HIGH COURT OF JUSTICE

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 LLP
2. **GLORIA ALLRED**, of Allred, Maroko & Goldberg
3. **DANI PERETZ**, of Geneva, Switzerland & Tel Aviv, Israel
4. **SHARI REDSTONE**, of Paramount Global, and Caribbean Holdings
5. **DAPHNE BARAK**, of Beverly Hills, California and Tel Aviv, Israel
6. **MICHAEL AVENATTI**, formerly of Eagan Avenatti LLP
7. **TOM GIRARDI**, incarcerated at Federal Medical Center, Butner, North Carolina, USA
8. **BLACK CUBE LTD**, an Israeli-owned private intelligence agency based in London and Tel Aviv, Israel
9. **LIMEWIRE NFT HOLDINGS**, with assets and servers in the Caribbean
10. **EDGAR BRONFMAN SR. (Deceased)**, estate with real property in St. Barthélemy
11. **JOHN BRANCA**, of West Hollywood and Jumby Bay, Antigua
12. **JOHN MCCLAIN**, music executive, of Los Angeles and Bahamas
13. **THE EXECUTIVE MEMBERS OF THE UNITED PROGRESSIVE PARTY (UPP)**,
Antigua & Barbuda
14. **And DOES 1–100**

Defendants

STATEMENT OF CLAIM



Submitted Date: 17/04/2025 13:21

Filed Date: 17/04/2025 13:21

Fees Paid: 52.00