

IN THE HIGH COURT OF JUSTICE

ANTIGUA AND BARBUDA

Claim No. ANUHCV 2025/0149

BETWEEN

H.E. ALKIVIADES DAVID

(Ambassador-at-Large for the Green Economy, SwissX Island Authority)

— Claimant / Applicant —

AND

PARAMOUNT GLOBAL, SHARI REDSTONE, BRAD GREY (est.),

BRIAN GRADEN, HARVEY WEINSTEIN, and others

— Defendants —

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COMPOSITE MOTION AND VICTIM IMPACT SUMMARY

(Filed in support of judicial relief, victim protection, and trauma mediation initiatives under CPR Part 12 and Part 26)

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SECTION 1 – OVERVIEW

This Motion consolidates all previously filed victim-impact declarations, evidentiary exhibits, and affidavits of service forming part of the record in the above-captioned matter. The Claimant, H.E. Alkiviades David, respectfully submits that the Defendant parties have

engaged in a coordinated and systemic pattern of sexual assault, coercion, racketeering, and intimidation, as evidenced by the declarations of multiple victims and witnesses attached as Exhibits JD1, KC, MS, and PEL.

These declarations reveal a sustained enterprise of abuse and suppression extending across decades, facilitated by media executives, attorneys, and private investigators tied to the Paramount/Viacom structure and its affiliates. The evidence is consistent with the methods described in the 2008 Pellicano Victim Impact Statements (U.S. v. Pellicano, Case No. 2:05-cr-01046-DSF), which documented illegal surveillance, wiretapping, and intimidation of victims and witnesses.

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## SECTION 2 – VICTIM IMPACT SUMMARY

(Summarizing EXHIBITS JD1, KC, MS, and WhatsApp testimony from Rovier Carrington)

The Claimant incorporates into this record the sworn declarations of:

- John Doe (JD1): detailing underage sexual assault by Brian Graden, aided by attorney Larry Stein, including non-consensual filming and blackmail threats;
- Keenan Carter (KC): confirming knowledge by executives Sumner and Shari Redstone, Brad Grey, and Reno Logan of the abuse, as well as media complicity through Variety and other outlets;
- Mercedes Stanley (MS): verifying consistent reports of Graden and Weinstein's abuse of Rovier Carrington, corroborating conversations and threats witnessed first-hand;
- Rovier Carrington (WhatsApp and affidavit): affirming his role as primary witness and survivor of long-term abuse, alleging coercion during his U.S. proceedings, and further identifying attorney misconduct and witness intimidation.

The combined record forms a consistent evidentiary chain demonstrating not only individual crimes but the persistence of a coercive system maintained by powerful media and legal figures.

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### SECTION 3 – PARALLELS TO HISTORICAL PRECEDENTS

The methods employed mirror those documented in prior cases:

- Pellicano (2008): illegal wiretaps, threats, intimidation, and collusion between media and law enforcement to suppress victims;
- McGowan (2019): covert operations by Black Cube on behalf of Weinstein to manipulate and discredit accusers;
- Carrington (2020–2025): coerced filings, suppression of evidence, and weaponization of court procedure to discredit a victim.

These patterns confirm continuity in Hollywood’s exploitation network—a convergence of corporate power, lawfare, and surveillance designed to conceal systemic sexual and psychological abuse.

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### SECTION 4 – PROCEDURAL HISTORY

Since the initial filing of ANUHCV 2025/0149, multiple defendants have been duly served under international process standards. The record includes notarized Affidavits of Service for Paramount Global, Shari Redstone, Brian Graden, and others. Despite verified service, several defendants, including Ms. Redstone, have failed to appear, respond, or acknowledge the proceedings, resulting in procedural default.

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### SECTION 5 – SUPPORTING LEGAL FRAMEWORK

Under CPR Part 12 of the Eastern Caribbean Supreme Court Rules, default judgment is appropriate where a defendant fails to file acknowledgment of service or defence within the prescribed period following valid service. The Claimant now moves the Court to exercise this authority and issue judgment accordingly.

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SECTION 6 – NOTICE OF NON-APPEARANCE AND DEFAULT OF DEFENDANT SHARI REDSTONE

(Full narrative of double service, procedural default, and grounds for default judgment.)

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SECTION 7 – ESTABLISHMENT OF A SPECIAL COUNCIL FOR VICTIM TRAUMA AND PTSD MEDIATION

(Full SCVTM description and funding via seized defendant assets; alignment with HARCATTACK.)

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SECTION 8 – EXHIBITS INCORPORATED INTO RECORD

(Complete list of JD1, KC, MS, PEL, ROV1, Redstone.NY-1, and HARC-2024.)

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SECTION 9 – PRAYER FOR RELIEF

(Initial relief requests.)

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## SECTION 15 – INSTITUTIONAL COMPLICITY AND EXECUTIVE AWARENESS

The declarations, affidavits, and exhibits before this Honourable Court establish that the system of exploitation and concealment operated within a closed hierarchy of global media and financial elites, encompassing Paramount Global, Comcast, Disney, News Corporation, Access Industries, Oracle Corporation, and their affiliates.

Shari Redstone, Brian Roberts, Robert A. Iger, and Rupert Murdoch exercised managerial authority and fiduciary control during periods when acts of abuse, coercion, and suppression occurred under their watch. Evidence links these executives to Oracle’s Russian data operations, the Bronfman-Blavatnik network, and Ellison family ventures—demonstrating a single economic and ideological cartel financed through organized crime proceeds.

The Claimant demands forensic investigation and criminal referral coordinated with the DPP, SwissX Legal, AG Steadroy “Cutie” Benjamin, and partner courts in the UK and US, extending to officers, trustees, and financiers implicated in the abuse and suppression of victims.

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## SECTION 17 – SMOKING GUN EVIDENCE AND JUDICIAL NOTICE

The evidentiary record—comprised of Exhibits JD1, KC, MS, PEL, and Redstone.NY-1, together with digital declarations and recorded communications—constitutes prima facie proof of a coordinated criminal enterprise financed through organized-crime proceeds and protected by corporate influence across U.S. and international jurisdictions. These materials are hereby adopted in full as the Claimant’s “smoking gun evidence.”

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SECTION 18 – CONSOLIDATED COMPLAINT DIGEST (COTTER’S COURT – MAHIM KHAN v. DAVID, KB-2025-001991)

This Honourable Court is invited to take judicial notice of parallel proceedings before the High Court of Justice, King’s Bench Division (KB-2025-001991). The Consolidated Complaint Digest (Exhibit Z1) details the transnational misconduct, fabricated judgments, and coordinated lawfare targeting the Claimant and Antigua’s sovereign interests.

The Master Smoking Guns Index (SG-1 to SG-17) serves as a roadmap of this criminal enterprise, documenting MediaDefender-CSAM leaks, judicial suppression, attorney murders, and the Alpha Nero lawfare campaign against Antigua.

The Claimant requests consolidation of this record into Antigua proceedings and referral to:

- U.S. Department of Justice (DOJ)
- UK Metropolitan Police (Human Trafficking & Organized Crime Units)
- Attorney General of Antigua & Barbuda, Hon. Steadroy “Cutie” Benjamin

for coordinated prosecution, asset tracing, and sanctions enforcement.

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SECTION 19 – PRAYER FOR RELIEF

The Claimant respectfully requests that the Court:

1. Enter Default Judgment against all non-appearing Defendants;
2. Recognize victim-impact evidence as basis for criminal referral and sanctions;
3. Direct criminal referral before the DPP and international tribunals;
4. Approve formation of the Special Council for Victim Trauma and Mediation (SCVTM);
5. Grant orders for witness protection and whistleblower immunity.

Dated: October 2025

Filed by:

H.E. ALKIVIADES DAVID

Ambassador-at-Large for the Green Economy

SwissX Island Authority

In partnership with Legal & Pace Law School Consortium

[END OF MOTION]