

**IN THE HIGH COURT OF JUSTICE**

ANTIGUA & BARBUDA

Claim No.: ANUHCV2025/0149

Alkiviades "Alki" David v. The Hollywood Media Cartel

**MEMORANDUM IN SUPPORT OF EXHIBIT – OPEN LETTER & FORMAL  
LEGAL NOTICE TO UCLA AND RELEVANT PARTIES**

## **1. Purpose of Submission**

This memorandum tenders into the record the Open Letter published August 10, 2025 on Shockya.com and syndication partners, serving as: a formal demand under law to UCLA and associated parties; a public notice of evidence preservation and discovery obligations; and a corroborating exhibit linking U.S. misconduct (psychiatric coercion, media suppression) to the broader Cartel enterprise at issue in this case.

## **2. Legal Framework**

### **a. California Statutory Authority**

- California Public Records Act (Gov. Code § 6250 et seq.) imposes a mandatory duty on UCLA, as a public institution, to disclose non-exempt records, including communications involving Dr. Wexler, Dr. Lieberman, and related psychiatric holds.
- California Evidence Code §§ 1040–1045 obliges disclosure of information relevant to public interest litigation and prevents suppression of evidence through over-broad privilege claims.
- Mandatory Reporting Laws under California Penal Code § 11160 et seq. obligate clinicians and institutions to report suspected abuse to law enforcement.

### **b. UK High Court Jurisdiction (Kahn v. David)**

The Open Letter demonstrates that psychiatric coercion tactics directly intersect with the London litigation, where Howard Kennedy LLP and affiliates have deployed procedural intimidation to suppress testimony. Under the Civil Procedure Rules (CPR, UK), discovery can extend to connected parties in foreign jurisdictions where justice so requires.

### **c. Antigua & Barbuda Jurisdiction**

As this action is brought on behalf of the Sovereign Interests of Antigua & Barbuda, the publication establishes constructive notice to Defendants. The Evidence Act (Antigua) allows for the admission of publicly available digital publications, where authenticity is proven and dissemination is global.

## **3. Key Findings in the Open Letter**

- Systemic abuse via psychiatric holds (5150) tied to Dr. Wexler, Dr. Lieberman, and Anthony Pellicano.
- Existence of the Malibu Mega Group, operating coercion and asset capture networks.
- Media-Tech nexus implicating CBS Interactive executives (Moonves, Bonnie, Smith, Mohn) in narrative control and exploitation.
- Direct victimisation of the Claimant through coerced meetings, false psychiatric labels, and medical harm.
- Precedent linking these abuses to Michael Jackson and his children, showing continuity of methods.

## **4. Judicial Significance**

The Open Letter functions as contemporaneous notice, creating liability for spoliation if UCLA or named parties destroy or withhold evidence. It demonstrates the continuity of coercive practices from the Jordan Chandler/Michael Jackson era to present litigation. It supports the Claimant's plea that the Court treat psychiatric abuse evidence as central to proving the Cartel's pattern of racketeering and intimidation.

## **5. Relief Sought**

The Claimant respectfully requests that this Honourable Court:

1. Admit the Open Letter (Aug 10, 2025) as Exhibit E in the record.
2. Recognise the CPRA demand as binding upon UCLA and monitor compliance.
3. Issue an order of judicial notice confirming that Defendants and affiliates are on record notice of their obligations.
4. Permit cross-jurisdictional discovery under the Court's inherent authority, tying UK and U.S. evidence to the Antigua proceedings.

Respectfully submitted,

Digitally Signed,

**Alkiviades “Alki” David**  
Claimant & Sheriff-at-Large  
(on behalf of the Sovereign Interests of Antigua & Barbuda)

**Exhibit E (attached separately):**

Open Letter & Formal Legal Notice to UCLA, Dr. Eric M. Wexler, Dr. Carole Lieberman, Guy Oseary & Relevant Oversight Authorities, published August 10, 2025 on Shockya.com and syndication partners.