

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA  
SECOND APPELLATE DISTRICT  
EVA McCLINTOCK, CLERK

DIVISION 1    March 17, 2026

Ebby S. Bakhtiar  
Livingston & Bakhtiar  
3435 Wilshire Blvd., Suite 1669  
Los Angeles, CA 90010

Gary A. Dordick  
Dustin Zal Moaven  
Dordick Law Corporation  
1122 Wilshire Blvd.  
Los Angeles, CA 90017

JANE DOE,  
Plaintiff and Respondent,  
v.  
ALKIVIADES DAVID et al.,  
Defendants and Appellants.

B341119 consolidated with B345361  
Los Angeles County Super. Ct. No. 20STCV37498

NOTICE TO ALL COUNSEL RE RESPONDENT'S DEFAULT

This form has been mailed to all counsel to advise that counsel for respondent has failed to file a timely respondent's brief and that notice of default has issued.

Counsel for respondent(s) Jane Doe is hereby notified that if the brief is not on file within 15 days after the date of this notice, or good cause shown for relief from default, the appeal will be submitted for decision upon the record and appellant's opening brief. (Cal. Rules of Court, rule 8.220(a)(2).)

***Respondent(s) should take note that failure to file a brief will be deemed a waiver of oral argument.***

Very truly yours,  
Eva McClintock, Clerk

by: \_\_\_\_\_  
Deputy Clerk

cc: James G. Bohm  
Cecilia Preciado  
File

FILED

Mar 16, 2026

EVA McCLINTOCK, Clerk

Jlozano

Deputy Clerk

2nd Civil B341119  
Consolidated Appeal No. B345361

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA  
SECOND APPELLATE DISTRICT, DIVISION ONE

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JANE DOE,

Plaintiff and Respondent

v.

ALKIVIADES DAVID,

Defendant and Appellant

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Superior Court of the State of California  
County of Los Angeles, Case No. 20STCV37498  
Honorable Christopher K. Lui, Judge

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**ORDER**

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The Court has read and considered the respondent's Motion to Dismiss Appeal and Motion for Judicial Notice, both filed February 19, 2026; appellant's opposition to the motion to dismiss, filed March 6, 2026; and respondent's reply to the opposition, filed March 10, 2026.

Respondent's motion for judicial notice is granted. Ruling on respondent's motion to dismiss is deferred to the panel.

Dated: Mar 16, 2026



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Acting Presiding Justice

High Court of Justice – Antigua and Barbuda

Case No: ANUHCV2025/0149

**BETWEEN :-**

**Alkiviades David**

**Claimant**

**-and-**

**Attorneys & Cartel Operators**

1. Lisa Bloom
2. Joseph Chora
3. Nathan Goldberg
4. Renee Mochkatel
5. Dolores Leal
6. Carole Lieberman
7. Louis Freeh
8. Robert Shapiro
9. Eric Wexler
10. Fred Heather

**Plaintiffs Identified in Fraudulent / Coordinated Claims**

1. Elizabeth Taylor
2. Mahim Khan
3. Lauren Reeves
4. Chasity Jones
5. Marguerita Nichols (Jane Doe)

**Judicial Machinery / Forums (Service via Clerk of Court)**  
**Los Angeles Superior Court Judges**

- Michelle Williams
- Terry Green

- Christopher Lui
- Rafael Ongkeko
- Yolanda Orozco
- Thomas Falls

**California Court of Appeal – Second District**

- Elwood Lui (Presiding Justice, retired)

**Media Corporations & Executives**

- Paramount Global  
Office of the CEO: George Cheeks / Brian Robbins / Chris McCarthy
- CBS Interactive  
Jim Lanzone
- Red Ventures
- CNET
- Disney
- ABC
- Vivid Entertainment
- Warner Music Group
- Vivendi
- Universal Music Group
- Sony Music
- Sony Pictures  
Ravi Ahuja
- Fox Corporation  
Lachlan Murdoch
- News Corp
- Comcast  
Brian L. Roberts
- NBCUniversal
- Sipur Entertainment (Israel)

**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 (now UBS) – Sérgio Ermotti / Ulrich Körner (former)
- Prudential – Charles Lowrey
- ICICI Prudential – Anup Bagchi

**Enforcers / Fixers**

- Anthony Pellicano (Los Angeles)

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**STATEMENT of SERVICE**

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I, Martin Wilson, Process Server are currently employed in this matter to effect service by Kent Legal UK, my place of work is at 8th St, Los Angeles, CA 90014, USA I will say as follows.

1. I am of over 18 years of age.
2. I am authorised to make this Affidavit on behalf of the Claimant in this action.
3. I make this Affidavit from my own knowledge except where stated otherwise.
4. I make this affidavit in support of the personal service of proceedings upon the Defendants listed in EXH A attached
5. The following documents:
  - (i) LAWSUIT Authorization codes.pdf
  - (ii) LAWSUIT Cover page and Docs\_Alkiviades David.pdf
  - (iii) LAWSUIT mage\_evidence\_Alkiviades David.pdf
  - (iv) LAWSUIT Claim Form (6).pdf

- (v) LAWSUIT Further Exhibits.pdf
- (vi) Particulars of Claim QR Code (incorporating exhibits).

6. I believe that service has been duly affected in accordance with the procedural rules and applicable international treaties/laws.

Statement of Truth

I believe that the facts stated in this Affidavit are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised by the Claimant to sign this Statement of Truth.

Name and position:

Signed: *Martin Wilson*

Dated: 01<sup>st</sup> November 2025

Place: New York



**Exhibit A - Service Addresses:**

**1) ATTORNEYS & RELATED OPERATORS — Service Addresses (firm / employer)**

- **Lisa Bloom**  
The Bloom Firm, P.C.  
**Address:** 20700 Ventura Blvd., Suite 301, Woodland Hills, CA 91364
- **Joseph Chora**  
Chora Young LLP (or counsel of record)  
**Address:** 650 Sierra Madre Villa Ave., Suite 304, Pasadena, CA 91107
- **Nathan Goldberg**  
(Serve via counsel / firm — if representing Allred matters serve Allred firm)  
Suggested service: **Allred, Maroko & Goldberg / Gloria Allred related office**  
**Address:** 6300 Wilshire Blvd., Suite 1500, Los Angeles, CA 90048
- **Renee Mochkatel**  
(Serve via counsel/firm)  
Suggested service: Rust, Armenis & Schwartz (or counsel of record)  
**Address:** 15760 Ventura Blvd., Suite 700, Encino, CA 91436
- **Dolores Leal**  
The Law Offices of Dolores Leal (or counsel of record)  
**Address:** 611 West 6th St., Suite 1675, Los Angeles, CA 90017
- **Dr. Carole Lieberman (psychiatry)**  
Professional office (serve via practice or via counsel)  
**Address:** 435 North Bedford Drive, Suite 406, Beverly Hills, CA 90210
- **Louis Freeh**  
Freeh Sporkin & Sullivan LLP (or Freeh Group addresses)  
**Address:** 1055 Thomas Jefferson St NW, Suite 204, Washington, DC 20007
- **Robert Shapiro**  
Glaser Weil LLP (or counsel of record)  
**Address:** 10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067
- **Dr. Eric Wexler (psychiatry / UCLA-affiliated)**  
Serve via UCLA Health Risk Management / legal counsel for service.  
**Address for service:** UCLA Health Risk Management, 10920 Wilshire Blvd., Suite 700, Los Angeles, CA 90024  
*(Alternatively: serve via UCLA Health legal counsel / Office of General Counsel at UCLA)*

- **Fred Heather**  
(If counsel at Gibson Dunn or related firm): Gibson, Dunn & Crutcher LLP  
**Address:** 3161 Michelson Drive, Irvine, CA 92612
- **Anthony Pellicano** (enforcer/fixer)  
Serve via known business / counsel address (public):  
**Address:** 9601 Wilshire Blvd., Suite 1200, Beverly Hills, CA 90210  
(*If represented, serve the attorney of record.*)

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## **2) PLAINTIFFS (serve via their counsel / attorney of record; if unknown, serve via Clerk)**

- **Elizabeth Taylor** — Serve via counsel of record; if represented by Gloria Allred / firm:  
**Address:** Allred, Maroko & Goldberg (or counsel of record) — 6300 Wilshire Blvd., Suite 1500, Los Angeles, CA 90048
- **Mahim Khan** — Serve via counsel (e.g., The Bloom Firm if represented):  
**Address:** The Bloom Firm, P.C., 20700 Ventura Blvd., Suite 301, Woodland Hills, CA 91364
- **Lauren Reeves** — Serve via counsel of record (e.g., The Bloom Firm): same as above
- **Chasity Jones** — Serve via counsel of record (e.g., Chora Young LLP): 650 Sierra Madre Villa Ave., Suite 304, Pasadena, CA 91107
- **Marguerita Nichols (Jane Doe)** — If counsel of record (Tom Girardi previously represented), serve via counsel; otherwise:  
**Clerk of Court (LA Superior Court)** — service via court clerk (address below)

If plaintiff counsel is not listed or is in dispute, effect service through the Clerk of the Court handling the action (see Court addresses section).

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## **3) JUDICIAL MACHINERY / FORUMS — Service via Clerk of Court**

**Los Angeles Superior Court** (Clerk for service on matters within LA Superior)  
Stanley Mosk Courthouse  
111 North Hill Street  
Los Angeles, CA 90012

**California Court of Appeal — Second District (Clerk for service)**  
300 South Spring Street  
Los Angeles, CA 90013

**Note:** Judges (Michelle Williams, Terry Green, Christopher Lui, Rafael Ongkeko, Yolanda Orozco, Thomas Falls, Elwood Lui) are NOT personally served; filings and any service are routed through the court clerk and proper court processes.

## **4) MEDIA CORPORATIONS & EXECUTIVES — Registered Agent / Corporate Service (U.S.)**

For corporations, the safe method is service on the **Registered Agent (RA)** in the state of incorporation or via CT/CSC as the corporate RA where applicable.

- **Paramount Global**  
Registered Agent: CSC – Corporation Service Company (or state-specific RA)  
**Suggested RA address (CA/NY filings):** 2710 Gateway Oaks Dr., Suite 150N, Sacramento, CA 95833  
*(Also service at Paramount Global HQ for business address: 555 Fifth Avenue, New York, NY 10017)*
- **CBS Interactive / CNET**  
Registered Agent: CT Corporation System  
**RA address:** 330 N. Brand Blvd., Suite 700, Glendale, CA 91203  
*(Corporate HQ: 51 W. 52nd St., New York, NY 10019 — use RA for formal service.)*
- **Red Ventures**  
Registered Agent: CT Corporation System (or local RA)  
**RA address:** 330 N. Brand Blvd., Suite 700, Glendale, CA 91203 (use RA service)
- **CNET** (see CBS Interactive above)
- **Disney / ABC**  
Registered Agent: CT Corporation System  
**RA address:** 818 W. 7th St., Suite 930, Los Angeles, CA 90017
- **Vivid Entertainment**  
Serve at corporate office: 3599 Cahuenga Blvd. West, Suite 400, Los Angeles, CA 90068
- **Warner Music Group / Universal Music Group / Sony Music**  
Registered Agent: CT Corporation System (use RA)  
**RA address:** 330 N. Brand Blvd., Suite 700, Glendale, CA 91203
- **Vivendi** (U.S. registered presence) — service via registered agent or corporate counsel (use local RA)
- **Fox Corporation**  
Registered Agent: CSC – Corporation Service Company  
**RA address:** 2710 Gateway Oaks Dr., Suite 150N, Sacramento, CA 95833
- **News Corp**  
Registered Agent: CSC or CT Corporation (use RA for the state of service)
- **Comcast / NBCUniversal**  
Registered Agent: CT Corporation System  
**RA address:** 818 W. 7th St., Suite 930, Los Angeles, CA 90017
- **Brian L. Roberts (Comcast)** — Serve corporate matters via Comcast’s registered agent above or Comcast Corp HQ: Comcast Center, 1701 John F Kennedy Blvd, Philadelphia, PA 19103

- **Sipur Entertainment (Israel)** — Serve via corporate HQ/registered foreign agent; use international service via Hague Convention or local Israeli agent (use counsel to effect service)
- **Sony Pictures Entertainment** (Ravi Ahuja office) — service via RA (CT Corp): 330 N. Brand Blvd., Suite 700, Glendale, CA 91203 (or Sony Pictures HQ: 10202 Washington Blvd., Culver City, CA 90232)

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## **5) FINANCIAL INSTITUTIONS — HQ (service via Registered Agent / Corp Counsel acceptable)**

- **Bank of America** (Brian Moynihan) — Bank of America Corporate Center, 100 N. Tryon St., Charlotte, NC 28255 (or service via Bank of America Corporation Registered Agent in relevant jurisdiction)
- **Wells Fargo** (Charles Scharf) — Wells Fargo HQ, 420 Montgomery St., San Francisco, CA 94104
- **Deutsche Bank** (Christian Sewing) — Deutsche Bank AG US offices: 1 Columbus Circle, New York, NY 10019 (use RA / counsel as appropriate)
- **Citibank** (Jane Fraser) — Citigroup Center, 399 Park Ave., New York, NY 10022
- **JPMorgan Chase** (Jamie Dimon) — JPMorgan Chase Tower, 383 Madison Ave., New York, NY 10179
- **HSBC** (Noel Quinn) — HSBC North America HQ: 452 Fifth Ave., New York, NY 10018
- **UBS / Credit Suisse** (Sergio Ermotti / Ulrich Körner (former)) — UBS Americas HQ: 1285 Avenue of the Americas, New York, NY 10019
- **Prudential** (Charles Lowrey) — Prudential Financial, 751 Broad St., Newark, NJ 07102
- **ICICI Prudential** (Anup Bagchi) — Serve at ICICI Prudential corporate address in India or via RA in the jurisdiction where suit is filed (use international service rules)

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## **6) ENFORCERS / FIXERS**

- **Anthony Pellicano** — Public business / counsel address (use counsel of record if he is represented): 9601 Wilshire Blvd., Suite 1200, Beverly Hills, CA 90210 (public-facing address historically associated; always attempt service via attorney of record first)

**Case Number : ANUHCV2025/0149**



**IN THE HIGH COURT OF JUSTICE**

**ANTIGUA AND BARBUDA**

**Claim No: [To be assigned by Registry]**

**Submitted Date: 17/04/2025 13:21**

**Filed Date: 17/04/2025 13:21**

**BETWEEN:**

**Fees Paid: 52.00**

**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**

**1. Parties**

The Claimant, Alkiviades David (“Claimant”), is a dual-national entrepreneur, human rights advocate, and founder of SwissX, operating a sovereign wealth initiative and biofuel enterprise in St. John's, Antigua & Barbuda.

The Defendants, named and unknown, comprise a transnational syndicate of attorneys, intelligence agents, entertainment executives, political operatives, and private contractors who, acting in concert, have conducted a coordinated campaign of harassment, fraud, extortion, and racketeering against the Claimant. Many Defendants maintain residences, hold offshore accounts, and/or possess tangible and intellectual assets within the jurisdiction of Antigua & Barbuda or other Caribbean states including the Bahamas, St. Kitts & Nevis, Barbados, and St. Barthélemy.

## 2. Jurisdiction

This Honourable Court has **personal and subject-matter jurisdiction** under the laws of Antigua & Barbuda and the ECSC Civil Procedure Rules (Revised 2023), specifically where:

- Assets of the Defendants exist within Antigua & Barbuda (including real estate and bank accounts),
- Defendants have done business and committed tortious acts within the jurisdiction, and
- The harm suffered by the Claimant has had substantial effects locally, including reputational and economic damages impacting SwissX and its sovereign partnerships.

## 3. Factual Background

Between 2016 and 2025, the Defendants, jointly and severally, have:

- Filed and orchestrated **fraudulent lawsuits** across multiple jurisdictions including California, New York, and Europe, some of which have been **set aside or reversed** for procedural violations.
- Engaged in **conspiracy to defraud**, by fabricating witnesses, withholding exculpatory evidence, and tampering with court records and legal representatives.
- Directed **cyber and physical surveillance** operations using assets like Black Cube and Media Defender, targeting Claimant's businesses, legal advisors, and personal contacts.
- Illegally trafficked and monetized private data, music content, and intellectual property derived from the Claimant and Michael Jackson's estate via LimeWire and related platforms.
- Spread **false and defamatory narratives** in the international press and legal forums, harming the Claimant's reputation, interfering with government contracts, and deterring sovereign partners.

Notably, properties connected to the Defendants in **Jumby Bay, St. John's, Barbados**, and the **Bahamas** serve as conduits for laundering money, storing IP, and operating intelligence networks.

#### 4. Causes of Action

The Claimant brings this action under the common law and statutory principles of:

- **Conspiracy to injure**
- **Fraudulent misrepresentation**
- **Economic tort (unlawful interference with business)**
- **Defamation**
- **Breach of international and local fiduciary duties**
- **Conversion of intellectual property**
- **Tortious abuse of process**
- **Civil conspiracy**

#### 5. Relief Sought

The Claimant respectfully seeks:

- **General Damages** in the amount of **\$10,000,000.00 USD**, reflecting the magnitude of economic harm, reputational loss, and mental anguish.
- **Special Damages**, including loss of sovereign contracts, devaluation of intellectual property, and missed investment milestones.
- **Injunctive Relief**, restraining Defendants from further harassment, publication, or litigation relating to the matters herein.
- **Tracing and Recovery** of assets held in Caribbean jurisdictions under shell corporations or in trust.
- **Order for Disclosure** of all communications, financial documents, and related materials regarding Claimant.
- **Costs** of this proceeding.
- **Any further relief** this Honourable Court deems just and expedient.

#### 6. Verification

I, **Alkiviades David**, being the Claimant herein, affirm that the facts stated in this Statement of Claim are true to the best of my knowledge, information, and belief.

DATED this 17 day of April 2025.

  
\_\_\_\_\_  
**COMMISSIONER FOR OATH  
ANTIGUA & BARBUDA**

**Alkiviades David, Claimant**

*SwissX Island, St. John's, Antigua & Barbuda*

**Email:** [ceo@swissx.com](mailto:ceo@swissx.com)

**Phone:** +1 (268) 780-4133



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:

Fees Paid:42.00

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



IN THE HIGH COURT OF JUSTICE  
EASTERN CARIBBEAN SUPREME COURT  
ANTIGUA AND BARBUDA

**Submitted Date:03/02/2026 09:51**

**Claim No.: ANUHCV2025/0149**

**Filed Date:03/02/2026 09:51**

**BETWEEN**  
ALKIVIADES DAVID  
Claimant

**Fees Paid:12.00**

-and-

including executive members and officers of the  
**UNITED PROGRESSIVE PARTY**  
Defendants

**NOTICE OF CONTEMPT  
ACTUAL AND CONSTRUCTIVE NOTICE  
AND APPLICATION FOR DIRECTIONS**

The Claimant files this Notice to bring to the Court's attention the Defendants' persistent failure to acknowledge proceedings properly served and repeatedly publicised. The Defendants—thirteen (13) of fourteen—are senior UPP officers resident in Antigua and Barbuda. Their identities, roles, and residency are unchallenged on the record.

**Evidence of Actual Notice**

3. The Claimant personally informed Mr. Harold Lovell (former UPP Leader, practising attorney) of the claim, its filing date, and the UPP Defendants' involvement—on at least three separate occasions. Mr. Lovell acknowledged receipt and expressed no dispute.

No defence, acknowledgment, or appearance has been filed despite this direct oral notice from a senior party officer with direct knowledge of the Defendants and proceedings.

**Evidence of Constructive Notice**

5. The proceedings have been broadcast on three Antiguan national radio stations (names and dates on record) identifying the Court, claim number, Claimant, and UPP Defendants.

Shockya.com has published uninterrupted coverage for over three years—naming Defendants, quoting pleadings, and linking to the Court file.

On 12 May 2025, island.swissx.com published a detailed article mirroring the Claim Form, including the Court name, claim number, parties, and jurisdiction. That article remains live, accessible, and unretracted.

All Defendants reside within the Court's territorial reach; none has denied knowledge or challenged service.

**Prima Facie Contempt**

9. This conduct—knowing non-compliance by parties under the Court's jurisdiction—amounts to wilful disobedience and interference with justice.

**Relief Sought**

10. The Claimant therefore respectfully applies for:

- a. An order requiring the UPP Defendants to show cause, within seven (7) days, why they should not be cited for contempt;
- b. Costs of this application;
- c. Such further directions as the Court deems fit to secure compliance.

Filed in good faith. This Notice is not political; it is procedural. The Court's authority must not be ignored.

Dated: 3 February 2026

**Filed by:**  
ALKIVIADES DAVID  
Claimant in Person

Case Number :ANUHCV2025/0149



IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

Claim No. KB-2025-001991

Submitted Date:19/01/2026 13:51

Filed Date:19/01/2026 13:51

Fees Paid:22.00

Before Senior Master Cook



KB-2025-001991

Claimant

**BETWEEN**

Mahim Khan

- and -

Alkiviades David

(also known as Alki David)

Defendant

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**ORDER**

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**UPON** the application by the Claimant for a Third Party Debt Order filed on 5 November 2025 ("Application") and the Interim Third Party Debt Order dated 27 November 2025 ("Interim Order")

**AND UPON** the hearing of the Application having been listed for a remote hearing (via MS Teams) on 19 January 2026 at 10:30am to determine whether the Interim Order be made final, pursuant to the Notice of Hearing dated 22 December 2025

**AND UPON** the Third Party Bank, Revolut Ltd, having confirmed that it does not object to the Application and that it does not intend to appear at the hearing on 19 January 2026

**AND UPON** reading the evidence filed

**AND UPON** hearing Jamil Mustafa, Counsel for the Claimant, and the Defendant, appearing in person

**IT IS ORDERED THAT:-**

1. The hearing listed for 19 January 2026 at 10:30 a.m. be adjourned to the first available date after 19 February 2026.
2. Costs reserved.
3. A sealed copy of this Order shall be served by the Claimant on the Defendant and Revolut

**Dated this 19<sup>th</sup> day of January 2026**

**SERVICE OF THE ORDER**

The Court has sent sealed copies of this order to:

Howard Kennedy LLP  
No. 1 London Bridge  
London  
SE1 9BG