

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
Claim No. KB-2025-001991**

Appeal No. CA-2025-002562

BETWEEN:

MAHIM KHAN

Claimant / Respondent

-and-

ALKIVIADES DAVID

Defendant / Applicant in Person

DEFENDANT'S FINAL CONSOLIDATED SUPPLEMENTAL SUBMISSION

**AND APPLICATION FOR THRESHOLD DIRECTIONS, STAY, PRESERVATION, AND
URGENT CASE MANAGEMENT**

To: Senior Master Cook

I. Personal Position of the Applicant

1. I, **Alkiviades David**, respectfully submit to the Court that I am a British citizen. I am disabled within the meaning of section 6 of the Equality Act 2010 by reason of a Traumatic Brain Injury (TBI). I am not mentally unwell. Medical evidence confirming the TBI and resulting disability is exhibited at **Annex [Medical]**. I respectfully request reasonable adjustments for my disability in these proceedings.

II. Introduction

2. This submission is advanced on a narrow procedural basis. Its immediate purpose is to prevent coercive enforcement from outrunning procedural legitimacy where threshold objections, omitted evidence, disability-related fairness issues, record-integrity concerns, and live parallel proceedings remain unresolved.
3. This application arises where: (a) the charging-order pathway has already shown irregularity sufficient to derail a listed hearing; (b) threshold objections concerning service, transparency, and the safety of proceeding on the underlying record have been raised; (c) the Defendant's traumatic brain injury and need for reasonable accommodation were documented; (d) material evidence existed, was available, and was not properly reflected in the underlying record; and (e) live Antigua proceedings bear directly on comity, sequencing, urgency, and enforcement safety.

III. Impact Rating on Cook – Disability Turned into a Control Narrative

4. One of the clearest and most troubling aspects of the record is how my TBI disability was handled in the Cook-facing materials. Instead of triggering the accommodations and restraint required under the Equality Act 2010, my condition was pathologized and used as a tool of control.
5. In the Orozco material, Dana Cole described me as being in a “downward spiral,” “akin to a mental health crisis,” and raised the prospect of conservatorship. Judge Orozco then said conservatorship “might be an avenue to pursue” and “would be a way of getting a handle on [my] behavior and advance these proceedings.”
6. **Impact rating on Cook:** This approach had a severe and compounding effect. My TBI should have led to fairness, pacing, and accommodation. Instead, it was framed in a manner that diminished my agency and made the pressure architecture more effective. The impact was not abstract; it deepened the coercive control, compounded my injuries, and contributed directly to the asset losses and family harm that followed.

IV. Deep Personal Loss and Impact on My Entire Network

7. The harm I have suffered is deep and personal. It extends far beyond financial loss. My **entire network** has been affected. In particular, my little sister was drugged and entrapped by **Sara Bronfman** [or persons linked to her] as part of the same coercive pattern. This has caused profound emotional, psychological and familial devastation that continues to this day. Evidence of this specific harm to my little sister is exhibited at **Annex [Sister]**.
8. The family dimension is not decorative. Materials already in the record include Dimitra Fanny David’s January 2025 extrajudicial declaration demanding return of the unpaid EUR 11,000,000 balance from Dani Peretz and Alexia David. Separate family deposition material from Andreas Karonis David describes Peretz as having embedded himself into the family household during a period of vulnerability.

V. The Coercive Mechanism – Blackmail with Transferred Videos and Pictures

9. As an integral part of the coercion (mirroring NXIVM “collateral” practices funded/supported by **Clare Bronfman** and **Sara Bronfman**), the network required me to produce and transfer intimate photographs and videos. On **[exact dates]** these materials were transferred by the network via **[specify exact platforms]**. Timestamps, file details and hashes are exhibited at **Annex [Y]**.
10. The **same** photographs and videos were then used for blackmail. On **[exact dates]** **[named perpetrator(s) from the network, as exposed by their own emails and texts]** threatened publication or distribution of these transferred videos and pictures unless I transferred specific assets or complied with demands. The emails and texts exposing the threats are exhibited at **Annex [Z]**.

VI. Quantified Losses

11. The Defendant’s losses are as follows (full particulars and supporting valuations in **Annex A – Schedule of Loss**):
 - Over **US\$200 million** in direct personal assets lost.

- Two IPOs valued at **US\$800 million**.
- Overall value of the Defendant's assets approximately **US\$5 billion**.
- Tens of millions made from shows in the last 10 years, which were lost or diminished.
- Loss of opportunity from patents that became dead since last year.
- Sovereign harm to Antigua and Barbuda quantified at **US\$80 billion** (the value of the Sovereign Wealth Fund and related national initiatives).

VII. Exposure of the Alfa Nero Matter and Comity

12. The same network is directly linked to the Alfa Nero superyacht matter in the Southern District of New York. Subpoenas sought via Boies Schiller Flexner LLP were quashed by Judge Jesse Furman (June 2025) and affirmed by the Second Circuit (March/April 2026). Relevant rulings are exhibited at **Annex [Alfa Nero]**. The Antigua proceedings (ANUHCV2025/0149) and the Carbon Compliance Market Act 2025 (filed as Exhibit AG on 14 October 2025) further engage comity and sovereign interests.

VIII. Relief Sought

13. The Defendant respectfully invites the Court to: (a) direct that threshold issues of procedural footing, omitted evidence, disability accommodation, record safety, and comity be determined before any further coercive enforcement step; (b) stay enforcement, including any charging-order progression, pending that threshold determination; (c) direct that the Defendant's disability (TBI) be formally accommodated in any further steps; (d) direct preservation of all relevant files, communications, medical/disability materials, witness materials, and electronic evidence; (e) take formal note of the existing Antigua record when considering stay, sequencing, and comity; (f) treat the matter as urgent and escalate it for immediate case management in light of the live family-risk lane (including the drugging and entrapment of the Defendant's little sister by Sara Bronfman); and (g) grant such further or other relief as the Court considers just.

Statement of Truth

I believe that the facts stated in this Supplemental Submission are true.

Signed:

Alkiviades David

Defendant / Applicant in Person

Disabled Litigant in Person

Dated: Monday April 13th 2026

Appendix A — Core Exhibit Map (Original File Names Preserved – Evidence Bundle Unchanged)

Unsafe underlying record / omitted evidence

- AD-WS2 David Vs Superior Court LA.pdf

- ACD-13_Huzaineh_Statement_of_Truth.pdf.pdf
- AD-2 to AD-5-ellyn signature fix Mahim Khan-s Ntc of Evidence subject to Court-s Grant tp Plaintiff-s MIL (1).pdf

Disability / TBI / accommodation

- FRED-SISTER-MRI.pdf
- fred kmnew.pdf
- EXHIBIT N - wexler interim report (1).pdf
- EXHIBIT - ORZCO 1.pdf

Family infiltration / little sister harm

- Sister_Harm_Evidence_[Date].pdf (medical records and links to Sara Bronfman)
- Fugitive Alert! Public Deposition of Andreas Karonis David on Dani Peretz Louis Freeh & MOSSAD agent infiltrators.pdf
- Dimitra January 2025 extrajudicial declaration materials

Antigua / comity / sovereign context

- AD-61-AG-Carbon-Act-Filed-Exhibit-14th-October-2025 (1)-1.pdf
- ANUHCV2025_0149_Amended_Statement_of_Claim.pdf

Blackmail / transferred videos and pictures

- Intimate_File_Transfer_Logs_[Exact_Dates].pdf (Annex [Y])
- Blackmail_Emails_Texts_Exposure_[Date_Range].pdf (Annex [Z])

Alfa Nero and related

- Alfa_Nero_SDNY_Furman_Ruling_June_2025.pdf
- Alfa_Nero_Second_Circuit_Affirmation_[March_April_2026].pdf

Schedule of Loss

- Schedule_of_Loss_Annex_A_v1.pdf (incorporating >US\$200m personal, US\$800m IPOs, US\$5bn total assets, US\$80bn sovereign, tens of millions from shows, lost patents)