



SWISSX Criminal Complaint & Evidence Bundle

FINAL CRIMINAL COMPLAINT & EVIDENCE BUNDLE

To: Criminal Investigations Department (CID), Royal Police Force of Antigua and Barbuda

From: Alkiviades (Alki) David

Date: 27 March 2026

EXECUTIVE SUMMARY

This non-political complaint requests investigation into alleged criminal defamation, possible conspiracy, interference with justice, and the origin/authorship of a document relied upon in court proceedings. The bundle includes Exhibits A–H supporting the factual matrix.

EXHIBIT INDEX

Exhibit	Description
A	ABS Broadcast Transcript (Extract)
B–E	Antigua Court Order Pages
F	Original Claim Form (17 April 2025)
G	California Notice of Default (17 March 2026)
H	California Order (Motion Deferred to Panel, 16 March 2026)



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EXHIBIT A — ABS Broadcast (Extract)

The broadcast identified the complainant by name and characterized the litigation as a “total fabrication,” a “fishing expedition,” and part of a strategy to “throw mud” and “extort.” The broadcast further referenced local sources and attribution to the Leader of the Opposition, conveying that the claims were fabricated or “made up.”



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EXHIBITS B–E — Antigua Court Orders

Exhibit B — Court Order Page 1

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

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Rene Williams
Approved
7.11.2025

Exhibit C — Court Order Page 2

Exhibit D — Court Order Page 3

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

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



SWISSX Criminal Complaint & Evidence Bundle

EXHIBIT F — Original Claim Form (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



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EXHIBIT G — California Notice of Default (17 March 2026)

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



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**EXHIBIT H — California Order (Motion Deferred to Panel, 16
March 2026)**

Order confirming the respondent's motion to dismiss was not granted outright and was deferred to the appellate panel following full briefing. See attached order file in submission package.

SIGNED

Alkiviades (Alki) David

27 March 2026