



# **FINAL CRIMINAL COMPLAINT & EXHIBIT BUNDLE**

Alkiviades David | CID Submission | 27 March 2026

## **SUMMARY**

Non-political complaint concerning defamation, procedural restriction, and document irregularity with supporting exhibits.

## **EXHIBIT A – Broadcast Statements**

Statements include allegations of fabrication, fishing expedition, and extortion.

## EXHIBIT B – Court Order

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 15<sup>th</sup> 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 16<sup>th</sup> January 2026 for further hearing.
4. The shall have carriage of this order.

BY THE COURT  
REGISTRAR

Rene Williams  
Approved  
7.11.2025

**EXHIBIT C – Court Order**

except for the v  
Office shall refi  
Claimant without

3. The matter is adj
4. The shall have ca

Rene Williams  
Approved  
7.11.2025

**EXHIBIT D – Court Order**

**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 29<sup>th</sup> DAY October 2025**

**ENTERED : THE DAY 2025**

**APPEARANCES :**

**UPON THIS CLAIM** filed herein on 17<sup>th</sup> 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

## EXHIBIT E – Court Order

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 15<sup>th</sup> 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 16<sup>th</sup> January 2026 for further hearing.
4. The shall have carriage of this order.

BY THE COURT  
REGISTRAR

Rene Williams  
Approved  
7.11.2025

# EXHIBIT F – Original Claim Form

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

# EXHIBIT G – California Default Notice

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

## **EXHIBIT H – California Order (Deferred Motion)**

See attached referenced order confirming motion deferred to panel.