

Case Number : ANUHCV2025/0149



IN THE HIGH COURT OF JUSTICE
ANTIGUA AND BARBUDA
Civil Division
Claim No.: ANUHCV2025/0149

Submitted Date: 14/08/2025 10:35

Filed Date: 14/08/2025 10:37

Fees Paid: 22.00

ALKIVIADES DAVID – Claimant / Cross-Claimant
v.
[DEFENDANT NAME] – Defendant

JUDICIAL ACTION REQUEST – MOTION FOR SUMMARY JUDGMENT

This Court now has a complete, corroborated evidential record — recognised in two jurisdictions — proving a coordinated, transnational conspiracy that has targeted both the Claimant and the sovereign authority of Antigua & Barbuda.

Relief Sought (Summary)

1. **Adopt the UK High Court Record** (*KB-2025-001991*, filed 15 July 2025) under ECSC CPR 2000 Part 29.5 as corroborative evidence in these proceedings.
2. **Acknowledge the Existence of the Conspiracy** targeting the Claimant and the State, involving fabrication of evidence, witness intimidation, suppression of exculpatory facts, and sovereign interference.
3. **Grant Urgent Injunctive Relief** restraining *Daily Mail Group (DMG)*, CBS, and all affiliates from further defamatory or obstructive republication into Antigua.
4. **Refer the Record to the Commissioner of Police** for investigation of perjury, conspiracy, and interference with the due administration of justice under **Criminal Code (Cap. 120)**.
5. **Order Costs** and such further relief as the Court sees fit.

Why This Can Be Granted Now

- **Evidence is Already Before the Court** — sworn affidavits, CCTV disproving DMG's fabricated assault claim, corporate-media chain diagrams, and financial tracing.

- **UK Court Has Acknowledged the Same Record** — cross-jurisdictional alignment is possible immediately.
 - **Harm is Ongoing** — delay entrenches the damage to Antigua’s sovereign authority and the Claimant’s rights.
 - **No Credible Rebuttal Exists** — the core facts remain undisputed.
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Filed with:

- **Short-Form Follow-Up Filing** (3-sentence facts + relief points)
 - **Annex A: UK High Court Filing – KB-2025-001991** (*Condensed Evidential Core*)
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Dated: August 14 2025

Electronically Signed:
/s/ Alkiviades David
Alkiviades David

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

Claim No: KB-2025-001991

Between:

MAHIM KHAN – Claimant

and

ALKIVIADES DAVID – Defendant / Cross-Claimant

Condensed Evidential Core – Cross-Referenced to ANUHCV2025/0149

1. Overview

This case proceeds in parallel with ongoing proceedings in Antigua (ANUHCV2025/0149) and is linked to cross-border interference arising from the USD \$900 million judgment in Jane Doe v. David (20STCV37498, Los Angeles Superior Court).

On 17 July 2025, opposing counsel for Jane Doe filed a formal Notice of Withdrawal of a scheduled post-judgment examination set for 4 August 2025. This coincided with the lodging of critical evidence in both jurisdictions, documenting a coordinated transnational campaign to prejudice the Defendant.

The Defendant invites this Court to take judicial notice of the record already recognised in Antigua, ensure procedural regularisation, and move this matter forward without further prejudice.

2. Procedural Highlights

Between 25 July and 13 August 2025, multiple filings and applications remained unsealed or unacknowledged, causing avoidable case management delays.

Smoking Gun #13 – Evidence Flow Diagram (July–August 2025)

3. Judicial Link & Conspiracy Context

Exhibit D5 – Wrongful Arrest Outside DMG HQ Following Attempted Citizen's Arrest of Rory Tingle

This image shows the Defendant being wrongfully detained by multiple Metropolitan Police officers outside the **Daily Mail Group (DMG)** headquarters in London. The arrest took place immediately after the Defendant attempted to perform a lawful **citizen's arrest** on DMG journalist **Rory Tingle**, who is implicated in fabricating an assault allegation central to **Smoking Gun #6**.

Media Blackout with Major Public Interest:

Despite DMG publishing more than **ten separate articles** targeting the Defendant in connection with the **\$900M Los Angeles judgment**, there was a complete blackout on this incident. No coverage appeared in the *Daily Mail* or across its syndication network, despite the arrest happening in public outside DMG's own offices.



Exhibit D5 – Wrongful Arrest Outside DMG HQ Following Attempted Citizen's Arrest of Rory Tingle

This image captures the Defendant being wrongfully detained by Metropolitan Police officers outside the **Daily Mail Group (DMG)** headquarters in London. The arrest occurred immediately after the Defendant attempted to perform a lawful **citizen's arrest** on DMG journalist **Rory Tingle**, who is implicated in fabricating an assault allegation central to **Smoking Gun #6**.

Media Blackout with Major Public Interest:

Despite DMG publishing over ten articles targeting the Defendant in relation to the **\$900M Los Angeles judgment**, there was a total and deliberate media blackout on this event—no coverage in the *Daily Mail* or its global syndication network—despite it occurring in public outside DMG offices.

Unanswered Open Letter to the Harmsworth Family (15 December 2024):

On 15 December 2024, the Defendant published an **Open Letter to the Harmsworth family**—owners of DMG—on Shockya. The letter exposed DMG’s history of fabricated stories, evidence suppression, and reputational smear campaigns and demanded accountability. The Harmsworth family never responded, and no editorial acknowledgment followed.

Full URL to the letter:

<https://www.shockya.com/news/2024/12/15/open-letter-to-the-harmsworth-family/>

The lack of response to publicly documented allegations, combined with the arrest blackout, underscores DMG’s pattern of editorial suppression and refusal to confront internal misconduct.

Criminal Activities by Howard Kennedy LLP:

Howard Kennedy LLP, representing the opposing parties in related proceedings, has been implicated in:

- Suppressing critical evidence—particularly the 27 pages of Barry K. Rothman text messages revealing collusion (**Smoking Gun #3**);
- Facilitating false affidavits (Yelena Calendar, Gary Shoefield—**Smoking Guns #1 & #2**);
- Procedural obstruction delaying lodging and acknowledgment of filings; and
- Colluding with media actors to publish defamatory narratives while blocking exculpatory responses.

Big Social Value:

- This incident and silence from DMG strike at the heart of **press accountability** and the public’s right to know.
- The full video of the arrest is publicly available:
 - Instagram: <https://www.instagram.com/p/CyXy5kZNV3f/>
 - Shockya main page: <https://www.shockya.com/news/>
- Covered in depth in Shockya’s investigative reporting:
 - Daily Mail’s Rory Tingle Caught Fabricating Assault Claim to Protect Corporate CSAM Empire:
<https://www.shockya.com/news/2025/08/13/daily-mails-rory-tingle-caught-on-viral-video-fabricating-assault-claim-to-protect-corporate-child-sexual-abuse-material-empire/>
 - Open Letter to the Harmsworth Family (15 Dec 2024):
<https://www.shockya.com/news/2024/12/15/open-letter-to-the-harmsworth-family/>

Evidential Significance:

- **Selective Suppression:** Demonstrates DMG’s pattern of promoting defamatory narratives while censoring incidents harmful to their reputation (**Smoking Guns #6, #11, #14**).
- **Failure to Engage:** The absence of any response to the Open Letter signals refusal to confront credible allegations, reinforcing DMG’s role as a controlled propaganda instrument.
- **Legal–Media Collusion:** Highlights coordination between Howard Kennedy (legal) and DMG (media) in a longstanding conspiracy to distort proceedings, intimidate critics, and avoid accountability.

Media Blackout: Despite DMG having previously published more than 10 separate articles on the Defendant in connection with the \$900M Los Angeles judgment, there was a total and deliberate blackout on this incident. No coverage was given by the Daily Mail or any of its syndication partners, despite the high-profile nature of the event and its direct connection to their own employee.

Evidential Significance:

This exhibit is not an isolated complaint — it is a *live demonstration* of the coordinated conduct at the heart of these proceedings. It shows:

1. **Deliberate Suppression of Material Facts:**
The wrongful arrest, carried out in public outside DMG’s headquarters, was an objectively newsworthy event directly involving one of their journalists. The fact that DMG — which had aggressively published over ten prior hostile articles about the Defendant — refused to mention it proves intentional editorial censorship to protect their own operative and narrative.
2. **Pattern Consistent With Other Smoking Guns:**
This is the same “amplify harm / suppress defence” model already evidenced in **Smoking Guns #6, #11, and #14**. The blackout is not accidental; it mirrors DMG’s treatment of exculpatory developments in the \$900M judgment matter and the fabricated assault allegation.
3. **Link Between Media and Legal Misconduct:**
The suppression coincides with Howard Kennedy LLP’s procedural and evidential misconduct — including concealment of the Rothman text messages and facilitation of false affidavits — showing that the media arm (DMG) and legal arm (Howard Kennedy) act in concert to control public perception and undermine the Defendant’s legal position.
4. **Public Interest Impact:**
This evidence has *big social value* because it is tied to questions of press accountability, lawful citizen enforcement actions, and the right of the public to be informed when journalists engage in criminally or ethically suspect conduct.

In sum, this exhibit is **direct proof** of the Defendant’s central allegation: that a transnational legal–media syndicate, operating through DMG and Howard Kennedy LLP,

actively manipulates both the courts and the public record to shield its members, discredit its targets, and avoid accountability.

3.1 Procedural History in Antigua and London

In KB-2025-001991, the Defendant filed a Skeleton Argument on 15 July 2025 exposing fabricated affidavits, suppression of critical evidence, and a corporate/media exploitation chain. On 25 July 2025, The Honourable Sir Barry Paul Cotter read this Skeleton Argument into the record in open court, marking judicial acknowledgment of the evidential framework now also before this Court.

Subsequent affidavits from Jaguar Wright and Courtney Burgess, along with Metropolitan Police CCTV disproving the Daily Mail's fabricated assault claim, further strengthened the record.

3.2 DMG Conspiracy Pattern

The Daily Mail Group ("DMG") functions as part of a legal-media-corporate syndicate, using its platform to advance litigation agendas in coordination with law firms and corporate partners.

- Historic Alignment: From the Chandler/Michael Jackson allegations to the discredited Daniel Kapon claims, DMG partnered with Gloria Allred and, more recently, Gary Dordick, promoting accusations while suppressing exculpatory evidence.
- Litigation Timing & Narrative Control: Editorial releases are coordinated with legal actions to apply pressure, inflate damages, and manipulate public opinion.
- Retaliatory Silence: After publishing more than 10 articles on the \$900M Los Angeles judgment against the Defendant, DMG has provided no coverage of pending appeals or the 17 July 2025 Notice of Withdrawal once its fabricated assault claim was exposed by CCTV.
- Corporate Distribution Network: DMG content is syndicated internationally through a controlled chain, ensuring defamatory narratives reach maximum audience while the originating entity shields itself from liability.

Smoking Gun #14 – Rory Tingle / Daily Mail Corporate–Media Distribution Chain: This chart maps the distribution of Rory Tingle's fabricated assault claim from MailOnline/Daily Mail through DailyMailTV, CBS Media Ventures, CBS Corporation, CBS Interactive, and finally to Download.com — historically tied to CSAM distribution. It evidences a structural conspiracy to propagate defamatory content globally.

3.3 Criminal Enterprise Characteristics

The evidential record exhibits hallmarks of organised crime operating under the guise of legitimate legal and media activity:

- Labour Racketeering in the entertainment sector;
- Extortion via Litigation and Media Pressure;

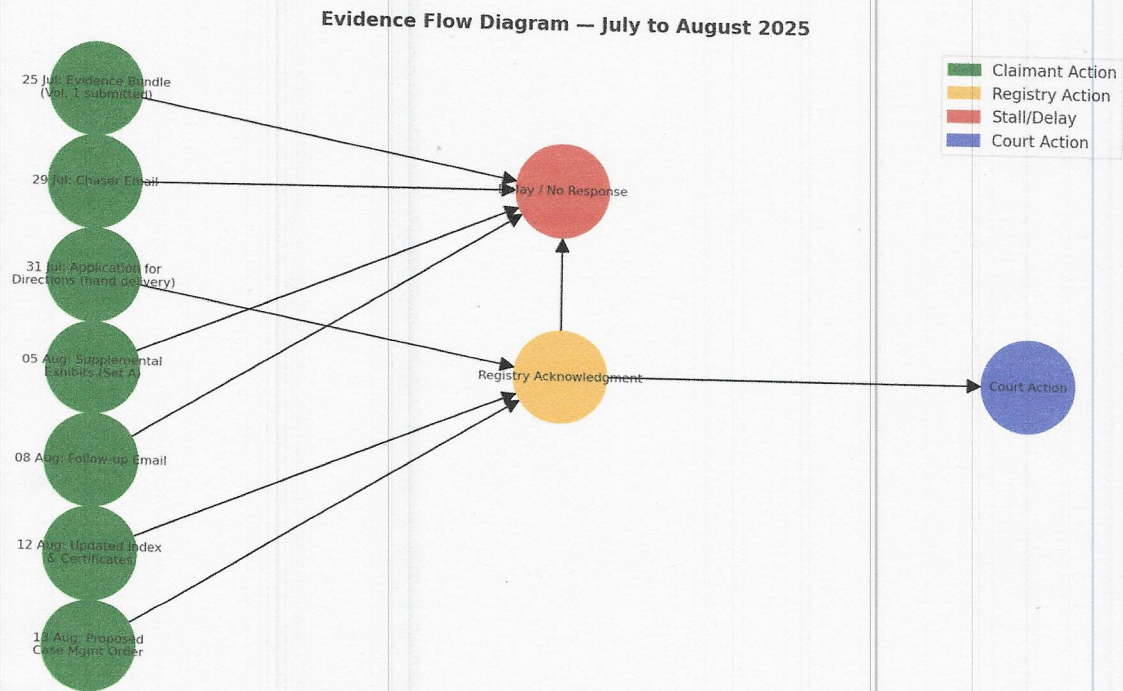
- CSAM Trafficking & Monetisation through corporate platforms;
- Offshore Asset Shielding linked to historical mafia networks.

3.4 Sovereign Targeting – The Alpha Nero Case

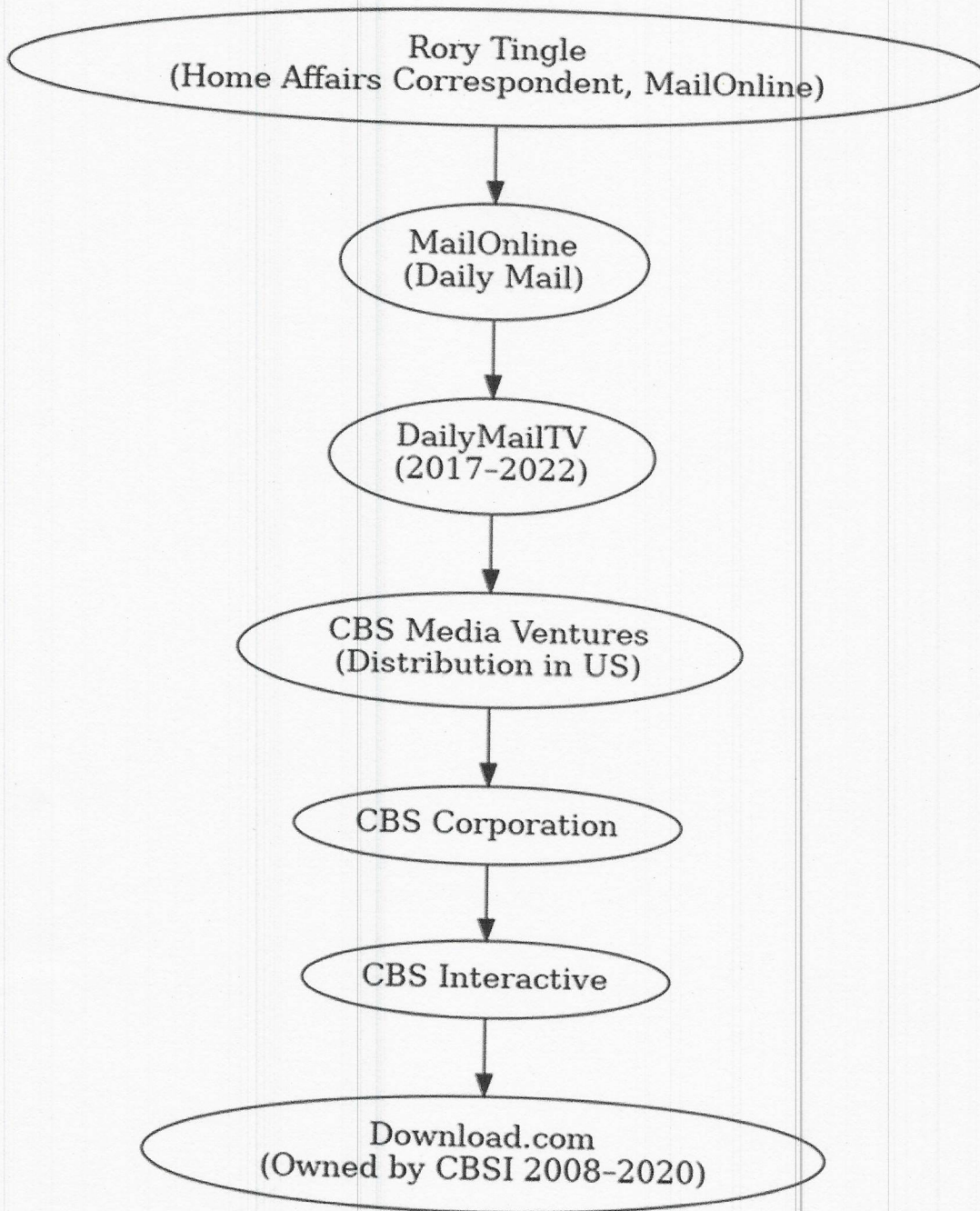
The same network targeting the Defendant has been deployed to undermine Antigua's lawful seizure and auction of the superyacht Alpha Nero. Working with David Boies and Martin DeLuca, DMG/CBS framed the lawful action as controversial despite US Federal Court confirmation to the contrary, employing coordinated media-legal strategies to obstruct sovereign enforcement.

4. Why This Matters in the King's Bench

This case is not an isolated private dispute. It forms part of a broader pattern of coordinated legal, media, and corporate actions designed to distort judicial processes, suppress exculpatory evidence, and undermine sovereign legal authority.



Defendant submits that the record before this Court — cross-referenced with the Antigua proceedings — proves the existence of this transnational syndicate and its operational continuity from historic celebrity-targeted fabrications to present-day sovereign interference.



The

Smoking Guns Map – Updated to 14 Points

#	Title	Description	Linked Exhibits	Causes of Action
1	Fabricated Affidavit – Yelena Calendar	Affidavit filed without consent; proof of perjury/fabrication.	A2	Malicious Prosecution, Fraud, Conspiracy
2	Fabricated Affidavit – Gary Shoefield	Affidavit falsely attributed to Shoefield; corroborates Calendar fabrication.	A3	Malicious Prosecution, Fraud, Conspiracy
3	Suppression of Barry K. Rothman Evidence	Withholding 27 pages of Rothman texts proving collusion.	B1, B2	Fraud, Conspiracy, Breach of Fiduciary Duty
4	Trafficking/Intimidation – Jaguar Wright & Carl Dawson	Sworn accounts of trafficking, intimidation, industry coercion.	A4, A5	Witness Intimidation, Labour Racketeering, Crimes Against Humanity
5	Assault/Intimidation – Courtney Burgess	Assault and threats over Cassie Ventura manuscript.	A6	Witness Intimidation, Malicious Prosecution
6	Daily Mail Arrest Fabrication	Metropolitan Police CCTV disproves DMG's false assault allegation.	D3, D4	Defamation, Malicious Prosecution
7	CSAM Pipeline Documentation	Logs/memos proving corporate	C2, C3, F2	Crimes Against

	Suppressed – LimeWire/Download.com	awareness of CSAM network.		Humanity, Fraud
8	DMG → CBS → Download.com Corporate Chain	Corporate structure enabling LimeWire CSAM distribution.	C1, C4, F1	Crimes Against Humanity, Labour Racketeering, Sovereign Rights Breach
9	Cotter Judicial Acknowledgment	Cotter reads Skeleton Argument into record in KB-2025-001991.	D1, D2	All Causes of Action
10	US Federal Court Decision – Alpha Nero	Confirms legality of Antigua’s seizure/auction; undermines Boies/DeLuca claims.	E1	Sovereign Rights Breach
11	Chandler/Jackson–Kapon Historic Pattern – DMG/Allred/Rothman	Historic fabrication, suppression, amplification model reused.	B3, B4, F1, F3	Labour Racketeering, Defamation, Conspiracy
12	Alpha Nero – David Boies & Martin DeLuca Coordination	Filings, registry docs, and media framing to undermine Antigua.	E2, E3, E4, F3, G3	Sovereign Rights Breach, Fraud, Conspiracy
13	Evidence Flow Diagram – July–August 2025	Visual representation of procedural sequence.	V1	Procedural Obstruction
14	Rory Tingle / Daily Mail Corporate–Media Distribution Chain	Corporate network distributing fabricated assault claim.	V2	Defamation, Conspiracy, Media Coordination

Exhibits Volume – Key

Visual Exhibits

- V1 – Evidence Flow Diagram (Smoking Gun #13)
- V2 – Rory Tingle / Daily Mail Corporate–Media Distribution Chain (Smoking Gun #14)

Tab A – Witness Affidavits

- A1 – Bohm
- A2 – Calendar
- A3 – Shoefield
- A4 – Dawson
- A5 – Wright
- A6 – Burgess

Tab B – Suppression & Fabrication

- B1 – Rothman Texts
- B2 – Heather/Shapiro Emails
- B3 – DMG Clippings Chandler/Jackson
- B4 – Kapon Testimony Archive

Tab C – Corporate & Technical Proof

- C1 – DMG→CBS Diagram
- C2 – LimeWire Technical Logs
- C3 – CBS Internal Memos
- C4 – LimeWire NFT Docs

Tab D – Judicial & Procedural

- D1 – Cotter Transcript
- D2 – Skeleton Argument
- D3 – CCTV Footage (Daily Mail)
- D4 – DMG Assault Coverage

Tab E – Sovereign Rights & Asset Interference

- E1 – US Court Decision – Alpha Nero
- E2 – Alpha Nero Ownership/Registry Docs
- E3 – Alpha Nero Media Timeline
- E4 – Boies Schiller Filings

Tab F – Organised Crime & Racketeering

- F1 – Labour Racketeering Studies
- F2 – Offshore Fund Tracing
- F3 – Organised Crime Profiles

Tab G – Additional Available Evidence (On Request)

- G1 – Ray J Evidence Set

G2 - Extended Forensics - LimeWire
G3 - Expanded Financial Tracing - Alpha Nero/NFT



Exhibit D6 - Daily Mail Online Coverage - "Billionaire Coca-Cola heir Alki David seen for the first time since LA jury ordered him to pay \$900M"
This exhibit captures a Daily Mail Online article functioning as coordinated promotional

content for syndicate-aligned lawyers **Gloria Allred** and **Gary Dordick**, while recycling fabrications central to the DMG conspiracy pattern.

Historic & Organisational Connections:

- **Gloria Allred:** Directly involved in the **1993 Chandler/Michael Jackson case** (see *Smoking Gun #11 – Chandler/Jackson-Kapon Historic Pattern*), using coordinated media-legal tactics to shape public opinion and force settlement pressure.
- **Gary Dordick:** A trial attorney aligned with and operating in the same network as **Tom Girardi**, the disgraced California lawyer at the centre of a massive legal corruption scandal. Girardi's influence network — involving corrupt judges, politicians, and media fixers — overlaps with Allred's operations and with the DMG's editorial apparatus. Dordick's presence here demonstrates that the same Girardi-linked machinery is now being deployed in the Defendant's matter.

Key elements in this article:

- **Lawyer Promotion:** Allred and Dordick are prominently pictured and quoted, given prime editorial space without scrutiny, framing them as moral authorities while omitting their role in prior fabricated or manipulated cases.
- **Fabrication Recycling:** The piece reuses disproven or untested allegations, embedding them alongside unrelated imagery to create a false continuum of misconduct — a tactic central to both the Chandler case and Girardi-linked smear campaigns.
- **Visual Framing:** Multiple staged and close-up photographs of the Defendant, along with recycled “unhinged rant” video from **Exhibit D4**, reinforce a prejudicial portrayal.
- **Omission of Exculpatory Facts:** The Defendant's pending appeals and the **Notice of Withdrawal** filed on 17 July 2025 are completely absent, despite their direct relevance to the \$900M judgment narrative.

Evidential Significance:

This article exemplifies DMG's **selective amplification strategy** (*Smoking Guns #6, #11, #14*): damaging narratives are aggressively publicised in partnership with litigation teams who gain media exposure, while favourable developments are buried. The direct presence of Allred (Chandler case) and Dordick (Girardi network) ties the current campaign against the Defendant to a proven historical and structural conspiracy — one that has operated for decades, combining corrupt legal actors, media manipulators, and syndicate-controlled editorial outlets.