



IN THE HIGH COURT OF JUSTICE

Submitted Date:15/09/2025 10:34

ANTIGUA AND BARBUDA

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Claim No: ANUHCV2025/0149

Fees Paid:22.00

BETWEEN

ANTIGUA & BARBUDA

(Claimant, by and through the Attorney General, with Sheriff-at-Large Alkiviades David)

-and-

THE MEDIA CARTEL

(Defendants: David Boies, Shari Redstone, Gloria Allred, Anthony Pellicano, Tom Girardi, Michael Avenatti, Gary Dordick, CBS Interactive, Antigua Observer, et al.)

ADDENDUM COMPLAINT AGAINST ANTIGUA OBSERVER

To: The Registrar, High Court of Justice – Antigua & Barbuda

The Claimant respectfully files this **Addendum Complaint** in the above-captioned matter, placing on record further particulars of defamation and sovereignty interference by the *Antigua Observer* newspaper.

1. Publication at Issue

On or about **September 2025**, the *Antigua Observer* published an article entitled: **“U.S. Court clears path for corruption probe into PM Browne’s finances to proceed.”**

This article falsely and misleadingly suggested that the Prime Minister of Antigua & Barbuda remains subject to an active corruption probe in the United States.

2. Material Omission of Binding U.S. Court Decision

The *Observer* failed to report that on **June 9, 2025**, the **United States District Court for the Southern District of New York** (Hon. Jesse M. Furman, J.) **dismissed all subpoenas, vacated its prior order, and ordered the destruction of all materials obtained**, holding that the applicant “failed to meet the statutory requirements for relief” under 28 U.S.C. § 1782.

3. Connection to Media Cartel

The false framing by the *Observer* mirrors a broader **mainstream media narrative** orchestrated by:

- **Shari Redstone’s Paramount/CBS Interactive,**
- **Comcast (NBCUniversal/DoubleVerify),**
- **Fox Corporation,**
- **Disney (ABC),**
- **Daily Mail Group,**

and their legal allies **David Boies, Gloria Allred, Anthony Pellicano, Tom Girardi, Michael Avenatti, and Gary Dordick.**

This coordinated strategy of **lawfare and misreporting** constitutes a deliberate assault on Antigua’s sovereignty.

4. Defamation and Sovereignty Breach

By omitting the binding U.S. Federal Court ruling, the *Antigua Observer*:

- committed **defamation by omission** against Antigua’s Prime Minister and Government;
 - undermined **public trust** in Antigua’s institutions;
 - and aided the Media Cartel’s broader attempt to **erode the sovereignty and international standing** of Antigua & Barbuda.
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5. Relief Sought

The Claimant respectfully requests:

1. A declaration that the *Antigua Observer* is **liable in defamation** and complicit in the Media Cartel’s sovereignty attack.
2. An order requiring the *Observer* to issue an **immediate correction and apology**, prominently in print and online, acknowledging the U.S. Federal Court ruling of June 9, 2025.

3. **Damages** for reputational harm caused to the Government and people of Antigua & Barbuda.
 4. **Costs** of this addendum complaint.
 5. Such further or other relief as this Honourable Court deems just.
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STATEMENT OF TRUTH

I believe that the facts stated in this Addendum Complaint are true.

Dated this **14th day of September 2025**

Electronically Signed:

/s/ Alkiviades David
Sheriff-at-Large
On behalf of Antigua & Barbuda

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