

IN THE HIGH COURT OF JUSTICE ANTIGUA AND BARBUDA CIVIL DIVISION

BETWEEN: ALKIVIADES “ALKI” DAVID, *Petitioner*

AND

DAVID BOIES, MARTIN DELUCA, and BOIES SCHILLER FLEXNER LLP, *Respondents*

# PETITION FOR DECLARATORY RELIEF, INJUNCTION, AND SANCTIONS

***FOR MALICIOUS PROSECUTION, ABUSE OF PROCESS,  
RACKETEERING, AND THE SUSPICIOUS DEATHS OF  
LEGAL COUNSEL***

**TO THE HONOURABLE COURT:**

The Petitioner, **ALKIVIADES "ALKI" DAVID**, by way of this Pro Se Petition, seeks declaratory and injunctive relief, as well as sanctions and damages, for an ongoing pattern of malicious litigation, extrajudicial coercion, international racketeering, and suspicious deaths of legal counsel in connection with a targeted campaign against himself and the sovereign interests of Antigua and Barbuda.

## **I. OVERVIEW**

1. On **June 5, 2025**, the United States District Court for the Southern District of New York dismissed an illegitimate action filed against the Petitioner and Prime Minister **Gaston Browne** by **Boies Schiller Flexner LLP**. The court held the matter to be without merit, a political act disguised as legal process, confirming that the

litigation served no purpose other than reputational harm and jurisdictional harassment.

2. This action was part of a broader criminal enterprise. Operating through legal proxies and intelligence intermediaries, the Respondents have engaged in what amounts to **hybrid legal warfare**, combining malicious prosecution with corporate sabotage, racketeering, psychological terror, and asset theft.
3. The Respondents' central goal has been to destabilize the Petitioner's ventures in Antigua—notably the SwissX Sovereign Wealth Fund, SwissX Island sustainable initiatives, and the FilmOn global media platform—while concealing far more grievous criminality, including **child exploitation via LimeWire 2.0**, illegal surveillance, and the systemic murder of lawyers acting on the Petitioner's behalf.
4. The Petitioner has endured **over a decade of legal warfare**, particularly in the field of digital media retransmission and intellectual property battles. Since 2010, he has engaged in extensive litigation across multiple jurisdictions and **prevailed consistently**, establishing key legal precedents. Among his **notable victories** are:
  - a. *FilmOn v. DoubleVerify*, which affirmed defamation and suppression of fair broadcasting;
  - b. *Alki David v. CBS Interactive*, exposing corporate misconduct and anti-competitive practices.

These cases demonstrate the Petitioner's persistence, credibility, and ability to defeat even the most entrenched legal and corporate adversaries.

## II. PATTERN OF CRIMINAL ENTERPRISE

4. The Respondents, notably **David Boies** and **Martin DeLuca**, operate in concert with disgraced and imprisoned attorney **Tom Girardi**, **Lisa Bloom**, and **Gloria Allred**, **Gary Dordick**, who have weaponized litigation against the Petitioner across multiple jurisdictions, exploiting victims, falsifying evidence, and utilizing media blackmail.
5. The Petitioner has been unlawfully targeted in coordinated attempts to seize control of **Hologram USA** and **FilmOn**, involving forged testimony, illegal judgments, and extorted settlements engineered through high-level judicial manipulation in California and New York.
6. These efforts are further supported by powerful media families including the **Redstones (CBS/Viacom)**, **Brian Roberts (Comcast)**, and digital surveillance

operatives such as **Black Cube**, used to infiltrate the Petitioner's Swiss family trust via **Dani Peretz** and **Nir Yatom**, working alongside **Daphne Barak** and **Ehud Barak**.

7. **Mrs. Dimitra David**, the Petitioner's 84-year-old mother, was threatened with false charges against her son unless she relinquished trust assets. This was accompanied by forced psychiatric evaluations, repeated harassment, and life-endangering threats made by legal operatives including **Fred Heather**, **Louis Freeh**, and **Robert Shapiro**.

### III. CHILD EXPLOITATION VIA LIMEWIRE 2.0

8. The Petitioner possesses evidence showing that **LimeWire 2.0**, a revived P2P platform linked to CBS Interactive and Media Defender, actively distributed **child sexual abuse material (CSAM)** under the guise of anti-piracy surveillance.
9. Attempts to expose these operations through **CBSYouSuck.com** and other platforms triggered the current campaign of legal and physical intimidation against the Petitioner.
10. The Petitioner contends that Respondents engaged in a **systematic cover-up** of these crimes, suppressing whistleblower evidence, murdering attorneys, and corrupting judicial forums in Switzerland, California, and the Caribbean.

### IV. SUSPICIOUS DEATHS OF LEGAL COUNSEL

11. At least **five attorneys** linked to the Petitioner have **died under suspicious circumstances** over the past six years:
  - **Barry K. Rothman** – Murdered in 2023 after siding with the Petitioner in the Allred/Girardi cases;
  - **John Quirk** – Died in an alleged accident shortly after preparing affidavits concerning CBS;
  - **Rebecca Rini** – Passed from "medical complications" three days after filing SwissX asset protection claims;
  - **Mark Lieberman** – Deceased following the transfer of digital evidence on Redstone/Boies collusion;
  - **[Fifth Name Withheld Under Seal]** – Killed while assisting in preparing this very case.

12. These deaths are **not coincidental**, but part of a pattern of extrajudicial targeting carried out by the Respondents and their agents, warranting referral to **INTERPOL** and the **UN Special Rapporteur on the Independence of Judges and Lawyers**.

## V. PRAYER FOR RELIEF

The Petitioner respectfully requests this Honourable Court to:

1. **Declare** the Respondents liable for malicious prosecution, abuse of process, conspiracy to commit racketeering, and international law violations;
2. **Issue an injunction** against any further litigation or legal harassment against the Petitioner and/or the Government of Antigua and Barbuda by the Respondents and their affiliates;
3. **Refer this matter** to INTERPOL and the United Nations for investigation of:
  - a. The suspicious deaths of Petitioner's legal counsel;
  - b. Child exploitation networks using LimeWire 2.0;
  - c. Transnational legal corruption orchestrated via Boies Schiller Flexner LLP;
4. **Award damages in excess of \$10 Billion USD**, to compensate for:
  - a. Theft of intellectual property and licensing royalties;
  - b. Disruption of FilmOn and SwissX public offerings;
  - c. Emotional distress and personal endangerment;
  - d. Wrongful deaths of legal counsel;
  - e. Fraudulent judgments and legal sabotage in multiple jurisdictions;
5. **Refer named attorneys**, including **Fred Heather, Robert Shapiro, Louis Freeh**, and any co-conspirators, to international and domestic bar tribunals for **professional misconduct, endangerment, and criminal complicity**;
6. **Grant any further relief** this Honourable Court deems necessary in equity and law.

**DATED this \_\_\_ day of June, 2025**

Respectfully submitted,



**ALKI DAVID**

*Petitioner, In Propria Persona*

SwissX Island, Antigua & Barbuda