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By email and Certified mail

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Dear Sirs,

We act for and behalf of Mr. Gaston Browne personally and in his capacity as the Prime Minister of Antigua and Barbuda and Minister of Finance and Corporate Governance.

Our Client is a widely known regional leader and political figure who has championed many regional and international issues including, Climate Change, Reparations, Mental Health, Youth Development, and Reform of the International Financial architecture among others. He is the Chairman of the SIDS Commission on Climate Change and International Law that obtained a favorable advisory opinion on climate from the International Tribunal for the Law of the Sea. Our Client has chaired a United Nations expert group on the development of the Multi-dimensional Vulnerability Index.



Our Client is also currently a governor of the World Bank and the Caribbean Development Bank, and a member of the Eastern Caribbean Central Bank Monetary Council. Presently, he is the Incoming Chair in office for the Commonwealth Heads of Government Meeting 2026, which will be held in Antigua and Barbuda and the Chairman in office for Small Island States - Antigua & Barbuda Agenda for SIDS. Our client also currently serves as the Chairman of the Organization of Eastern Caribbean States, and the Eastern Caribbean Central Bank. He is an international speaker in many regional, hemispheric and international bodies including: United Nations, Organization of American States, CELAC, CARICOM, and Conferences of the Parties (COP), among others.

Our client has instructed us that on or about March 11, 2025 and thereafter, in relation to the sale of the yacht styled *Alfa Nero* Attorney Martin DeLuca representing Yulia Guryeva-Motlokhova as an agent and employee of Boies, Schiller, Flexner made several statements that were directed towards our Client. Following are the statements made by Mr. DeLuca which are highly defamatory and the subject of this correspondence:

(1) On the Sale of *Alfa Nero* and Financial Transparency

**“The disappearance of millions from the sale of the *Alfa Nero* is just the beginning.”**

You made this statement in connection with a U.S. federal court filing seeking access to financial records of Antigua and Barbuda officials, including our Client, his wife, their son, the Accountant General, and the Ports Manager, as well as twelve (12) other entities. The filing alleges a lack of transparency in the US\$40 million sale of the *Alfa Nero* yacht, which was initially valued at US\$120 million. You added to the foregoing statement that the discovery seeks to uncover whether any alleged backroom deals for personal enrichment took place.<sup>1</sup> The clear imputation of this statement is that our Client is guilty of corruption, misappropriation of public funds, fraud, and/or misfeasance in public office.

(2) On the Alleged Sale Price of *Alfa Nero* (March, 2025)

**“The question is simple: did the government really sell *Alfa Nero* for just \$40m when all bids in the public auction were much higher than that – or is that just what was officially recorded.”**

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<sup>1</sup> Sources: Associated Press (AP News), March 12, 2025; ABC News, March 11, 2025; Antigua Observer Newspaper, March 12, 2025; Newsweek, March 12, 2025. See following links: <https://apnews.com/article/antigua-russia-yacht-alfa-nero-guryev-bac7a1c879b9cf0814adacf39845658d>; <https://antiguaobserver.com/yulia-guryeva-motlokhov-turns-to-us-court-seeking-financial-disclosure-following-the-sale-of-alfa-nero/>



You made this statement in an email to the publication known as *Superyacht Investor*, questioning the reported US\$40 million sale price of the *Alfa Nero* yacht to a Turkish buyer in July 2024, especially since earlier bids, such as one from former Google CEO Eric Schmidt for \$67 million, were significantly higher.<sup>2</sup> Again, the clear imputation of this statement is that our Client is guilty of corruption, misappropriation of public funds, fraud, and/or misfeasance in public office.

(3) On Allegations of Lack of Transparency and Political Motivations (March 18, 2025)

**“This isn’t about politics. It’s about following the money. Browne’s personal attacks won’t change the fact that real financial records — not his statements — will expose what happened to the Alfa Nero proceeds.”**

You responded to our client’s dismissal of allegations that his administration lacked transparency in the sale of the *Alfa Nero*. This statement was made to the Associated Press following a New York federal judge’s decision on March 17, 2025, to grant permission for subpoenas to access financial records of our client and other officials.<sup>3</sup> Once again, the clear imputation of this statement is that our Client is guilty of corruption, misappropriation of public funds, fraud, and/or misfeasance in public office.

The foregoing statements in their natural and ordinary meaning, and in context, are understood to mean and otherwise infer that our Client in the discharge of his public office as the Prime Minister and Minister of Finance and Corporate Governance dishonestly, corruptly and illegally appropriated millions of dollars from the sale of the vessel to and for his personal benefit, and therefore committed the criminal offences of corruption, breach of his fiduciary duties, fraud and misfeasance in public office contrary to law including the relevant anti-corruption Acts of Antigua and Barbuda.

These statements were made by Mr. DeLuca intentionally to harm the reputation of our Client and/or recklessly without first seeking comments from our Client or presenting the allegations upon which you purported to rely on, before making your baseless comments.

Further, your utterances and harm done to our Client were aggravated by the fact that you, as Counsel for a litigant, a member of a prestigious law firm, and an officer of the court, leveraged your professional standing to deliberately lend unwarranted credibility to these false and malicious allegations.

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<sup>2</sup> Source: *Superyacht Investor*, March 20, 2025. See following link:  
<https://www.superyachtinvestor.com/news/antigua-to-challenge-us-jurisdiction-over-alfa-nero-sale/>

<sup>3</sup> Source: AP News, March 18, 2025; Newsday, March 18, 2025;  
<https://www.newsday.com/news/nation/antigua-yacht-russia-browne-m27024;>



Further, our Client has noted your reliance on the without notice order made in relation to the subpoenas. However, you failed to mention that the subpoenas were subsequently discharged and set aside by the learned Judge. Any implication of wrongdoing based on that initial order is therefore null and void. We are further instructed that your multiple allegations that our Client appropriated millions of dollars from the sale of the *Alfa Nero* yacht as alleged or at all, are patently false and highly defamatory of our Client. More importantly, your defamatory statements were made, published and re-published internationally and in Antigua and Barbuda despite the repeated denials by our Client to include the following publications:

#### DEFAMATORY REPUBLICATION AND AMPLIFICATION

1. Associated Press (AP News)

March 11, 2025: Reported that attorneys for Yulia Guryeva-Motlokhov, including Martin De Luca, filed a U.S. federal court motion in Puerto Rico seeking financial records of our Client, his wife, son, and other officials, alleging a lack of transparency in the \$40 million *Alfa Nero* sale, initially valued at \$120 million. The article quotes you Mr. De Luca: *"The disappearance of millions from the sale of the Alfa Nero is just the beginning,"* implying that our Client and/or his administration may have misappropriated funds.

<https://antiguaobserver.com/pm-threatens-legal-action-over-alfa-nero-sale-allegations-one-media-entity-retracts-article/>

<https://financialpost.com/pmnl/us-attorneys-for-a-russian-woman-seeking-to-recover-a-megayacht-target-antigua>

March 18, 2025: Quoted you Mr. De Luca stating, *"This isn't about politics. It's about following the money. Browne's personal attacks won't change the fact that real financial records — not his statements — will expose what happened to the Alfa Nero proceeds,"* suggesting our Client's claims of transparency are unreliable and implying potential financial misconduct. <https://financialpost.com/pmnl/us-attorneys-for-a-russian-woman-seeking-to-recover-a-megayacht-target-antigua>

The AP articles report on the court filing and your statements, presenting them as part of Guryeva-Motlokhov's legal challenge. The allegations are amplified by quoting you Mr. De Luca and detailing the subpoena request targeting our Client's finances.

2. Antigua Observer Newspaper

March 12, 2025: Reported on the AP story, repeating your claim that *"the disappearance of millions from the sale of the Alfa Nero is just the beginning"* and noting the subpoena request targeting our Client and others, implying potential misconduct in the sale. <https://antiguaobserver.com/pm-threatens-legal-action-over-alfa-nero-sale-allegations-one-media-entity-retracts-article/>



July 26, 2024: Quoted [Government] Opposition Attorney, Leon Symister, expressing concern about the sale price (\$40 million vs. \$120 million valuation or Eric Schmidt's \$67.6 million bid), stating, *"We have had a plethora of incidents, and mismanagement of our resources by this government,"* implying that our Client's administration mishandled or undervalued the sale for improper reasons. <https://antiguaobserver.com/alfa-nero-proceeds-already-spent-on-debts-government-dubs-lawsuit-by-claimed-owner-frivolous/>

Undated (When Silence Speaks, Part III): Stated, *"Court filings exist—real ones—lodged in the United States, naming Gaston Browne directly in connection to the Alfa Nero sale,"* and criticized our Client for not resigning despite allegations, implying he is avoiding accountability for potential misconduct. The article questions the transparency of the sale and suggests our Client's involvement in a scandal. <https://antiguaobserver.com/when-silence-speaks-part-iii-the-resignations-he-asked-for-and-the-one-he-wont-offer/>

The Antigua Observer covered the *Alfa Nero* case extensively, often quoting opposition figures or court filings that challenge our Client's handling of the sale.

### 3. Yahoo News

March 11, 2025: Republished the AP article, including your statement, *"The disappearance of millions from the sale of the Alfa Nero is just the beginning,"* and details of the subpoena request targeting our Client's financial records, implying potential financial misconduct. <https://financialpost.com/pmnl/us-attorneys-for-a-russian-woman-seeking-to-recover-a-megayacht-target-antigua>

March 18, 2025: Our Client was quoted stating, *"She [Guryeva-Motlokhov] and her attorneys have made scandalous, malicious and entirely false accusations in order to further her illicit ends. The principal targets of her defamatory comments have been myself, and members of my family,"* acknowledging the allegations' defamatory nature while repeating the context of the subpoena request, which implies our Client's involvement in questionable dealings. Your damaging claims continued to be disseminated.

### 4. Newsweek

March 12, 2025: Reported on the U.S. court filing, stating that Guryeva-Motlokhov's attorneys sought financial records of the Client and others, quoting your *"disappearance of millions"* statement, and noting the yacht's \$120 million valuation versus the \$40 million sale price, thereby implying potential financial misconduct or corruption. Newsweek's coverage presented your statements as reflecting credible claims in a high-profile case.



##### 5. Antigua News Room

April 27, 2025: Reported our Client's defense against allegations that "US\$10 million went missing" from the *Alfa Nero* sale, quoting him dismissing the claims as "utter rubbish" and our Client accusing [Government] Opposition figures of colluding with foreign actors to fabricate corruption claims. The article's mention of the \$10 million allegation, even while quoting our Client's rebuttal, repeats the implication of financial misconduct. <https://antiguanewsroom.com/browne-defends-integrity-dismisses-10m-alfa-nero-allegations-as-fabricated-nonsense/>

July 21, 2024: Quoted our Client, "An entity plans to challenge the government in court next week to seize the \$40 million collected from the sale of the *Alfa Nero*," and included reader comments calling our Client a "dictator" and accusing him of "stealing" the yacht, implying greed or corruption. <https://antiguanewsroom.com/pm-says-an-entity-is-planning-to-go-to-court-to-seize-alfa-nero-40m-payment/>

Antigua News Room covers local reactions and our Client's statements, but by repeating allegations of missing funds and publishing inflammatory reader comments, it amplifies potentially defamatory claims.

We are further instructed that notwithstanding our Client's denials of your allegations, you continued to make false allegations against our Client, and therefore maliciously compounded the damage he has already suffered because of your intentional or reckless statements. Your continued and repeated publication of these demonstrably false allegations across numerous platforms (including publications in Antigua and Barbuda) evidences an intent to cause unwarranted professional and personal damage to our Client. You repeatedly posted malicious statements about our Client with the intent to cause maximum damage to him both personal and professionally in every possible forum you could find to repeat your baseless statements.

The statements are:

On or about March 11, 2025, you posted the following statement on the platform X (formerly known as Twitter), that is to say:

*"Antiguan Prime Minister @gastonbrowne gov't seized a \$120M yacht, called it "abandoned," & sold it for pennies. Millions vanished.*

*Now, we seek to uncover the financial web behind this scandal & Browne's ties to foreign interests hostile to the U.S."*



On or about March 14, 2025, you posted the following on the platform X (formerly known as Twitter), that is to say:

*"@gastonbrowne won't show up in U.S. court-but he's ready to threaten defamation lawsuits against anyone questioning his secret below-market sale of a misappropriated \$120M yacht.*

*Too bad for him, financial records don't lie.  
Caribbean.loopnews.com/content/antigu...*

On or about March 17, 2025, you posted the following on the platform X (formerly known as Twitter), that is to say:

*"A leaked U.S. travel ban draft names Antigua over lack of transparency, the same issue of the Alfa Nero corruption scandal. Seems like @gastonbrowne corruption may drag every Antiguan passport holder down."*

On or about March 17, 2025, you further posted the following on the platform X (formerly known as Twitter), that is to say:

*"A U.S. federal judge has granted full discovery into the Alfa Nero scandal, forcing @gastonbrowne to face real scrutiny.*

*No more dodging, no more defamation threats-the evidence will speak for itself."*

On or about April 1, 2025, you posted the following statement on the platform X (formerly known as Twitter), that is to say:

*"For years, Antigua was sold to the highest bidder-passports, banking licences, diplomatic posts, all handed to criminals while its people were told to stay quiet.*

*Now, Antiguanans are demanding better and the world should stand with them."  
From antiguantrumpet.com"*

Our Client, therefore, believes that you intended or recklessly calculated that it would resound to your client's and your personal benefit at the expense of our Client, by exposing him to hatred, contempt and public ridicule personally, and as the holder of the Office of Prime Minister of Antigua and Barbuda and Minister of Finance and Corporate Governance.



Your statements have caused our Client severe financial and reputational harm. This is unacceptable to him.

In the circumstances, our Client demands that you immediately:

1. Cease to have any of your false allegations published;
2. Cause the words complained of to be removed from all the above-mentioned publications;
3. Cease and desist from further publishing these or similar allegations concerning our Client in any forum or manner;
4. Issue an apology to our Client in terms to be approved by us, on and in all the above-mentioned publications over the electronic/social media, and on the front page of *The Daily Observer Newspaper* and all other above-mentioned newspapers;
5. Compensate our Client in the appropriate sum of US\$10 million for the damage he has suffered.
6. Pay Attorneys' fees and costs on an indemnity basis.

It must be clearly understood that it is not our intention to restrict or censor your legitimate right to defend your client. However, our Client simply cannot allow you to use, or continue to use allegations which are completely baseless, patently and absolutely false, and which he has consistently denied.

Please also note that given you were at all material times acting as an employee and agent of Boies Schiller Flexner LLP, our Client intends to hold Boies Schiller Flexner LLP vicariously liable for your actions. The said law firm shall, therefore, be made a co-party to any contemplated lawsuit.

Do be advised that should you fail to act as demanded our Client will institute proceedings to seek compensation on the footing of aggravated damages and costs against you, Boies Schiller Flexner LLP and every person or entity responsible for publishing the statements with the words complained of by our Client.

In the meantime, our client reserves all rights in respect of any further allegation which may be made by you.

Yours faithfully



Rika A. Bird

cc:

Honourable Gaston Browne, Prime Minister, Minister of Finance and Corporate Governance