

**IN THE CIRCUIT COURT OF THE NINTH JUDICIAL
CIRCUIT IN AND FOR ORANGE COUNTY, FLORIDA**

GOLIATH VENTURES, INC.,

CASE NO.: 2025-CA-009246-O

Plaintiff,

v.

DANNY DE HEK,

Defendant.

DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT

Defendant Danny de Hek ("de Hek"), appearing pro se, moves to dismiss Plaintiff's Complaint pursuant to Florida Rules of Civil Procedure 1.140(b)(2) for lack of personal jurisdiction, 1.140(b)(5) for insufficiency of service of process, 1.140(b)(6) for failure to state a claim upon which relief can be granted, Florida Statutes § 768.295 (Florida's anti-SLAPP statute), and § 607.1502(1) for lack of capacity to sue as an unregistered foreign corporation. In support thereof, de Hek states as follows:

INTRODUCTION.

1. This action arises from de Hek's online publications, including blog posts, LinkedIn articles, and YouTube videos, in which he expressed opinions and commentary on publicly available information regarding Plaintiff Goliath Ventures, Inc. ("Goliath"), a

Wyoming-registered entity that is not registered to do business in Florida. de Hek's content, created and published from New Zealand, critiques Goliath's business model as potentially indicative of a "Ponzi scheme" based on disclosed public sources, such as its website, marketing materials, and investor testimonials.

2. de Hek, a New Zealand resident with no offices, agents, property, or systematic business activities in Florida, has insufficient contacts with Florida to support personal jurisdiction. Moreover, there is no credible evidence that de Hek was properly served in New Zealand in accordance with the Hague Service Convention, including an apparent attempt by an unidentified individual entering a private place of business, rendering the Complaint procedurally defective. Even if jurisdiction and service were proper, the Complaint fails to state viable claims for defamation or tortious interference, as de Hek's statements constitute protected opinion, fair comment on matters of public concern, and lack the requisite falsity or malice. Furthermore, this lawsuit is a quintessential Strategic Lawsuit Against Public Participation ("SLAPP") under § 768.295, Fla. Stat., designed to chill de Hek's free speech on cryptocurrency scams, a topic of widespread public interest.

3. Additionally, Goliath, as a foreign corporation transacting business in Florida without a certificate of authority, lacks capacity to maintain this suit under § 607.1502(1), Fla. Stat. Public records confirm Goliath is not registered as a foreign corporation in Florida, despite alleging a principal place of business and ongoing operations in Orange County.

4. Accordingly, the Complaint should be dismissed with prejudice, and de Hek should be awarded costs pursuant to § 768.295(4).

ARGUMENT

I. THE COURT LACKS PERSONAL JURISDICTION OVER DE HEK (FLA. R. CIV. P. 1.140(b)(2))

5. Florida courts apply a two-step inquiry to determine personal jurisdiction over a nonresident defendant: (1) whether the complaint alleges sufficient facts to bring the action within Florida's long-arm statute (§ 48.193, Fla. Stat.); and (2) whether exercising jurisdiction comports with constitutional due process under the Fourteenth Amendment. *Venetian Salami Co. v. Parthenais*, 554 So. 2d 499, 502 (Fla. 1989). Plaintiff bears the initial burden, but de Hek rebuts it here with affidavits and evidence showing insufficient contacts. *See Internet Sols. Corp. v. Marshall*, 39 So. 3d 1201, 1207 (Fla. 2010).

6. **The Long-Arm Statute Does Not Apply.** Plaintiff alleges jurisdiction under § 48.193(1)(a)(2) (committing a tortious act in Florida) and § 48.193(1)(a)(6) (causing injury in Florida from out-of-state acts while soliciting services). Neither applies.

a. **Section 48.193(1)(a)(2) – Tortious Act in Florida.** A nonresident commits a “tortious act” in Florida via electronic communications if the content is accessed in Florida and the tort arises therefrom. *Marshall*, 39 So. 3d at 1208. However, Plaintiff's allegations are insufficient: de Hek's content was published globally on platforms like YouTube and LinkedIn, not targeted at Florida. Mere accessibility in Florida does not suffice, especially where Goliath is a Wyoming-registered entity not registered in Florida, and the content critiques a Wyoming-based business model. *See Walden v. Fiore*, 571 U.S. 277, 285 (2014) (contacts must tie to the forum, not just the

plaintiff). Plaintiff provides no evidence of substantial Florida views or that the content was “published” (i.e., accessed) primarily in Florida. Recent cases confirm narrow application: In *Alexander v. Trump*, No. 4D2024-1983 (Fla. 4th DCA Feb. 12, 2025), jurisdiction failed where defamatory posts were not expressly aimed at Florida despite some local access. Similarly, in *Doe v. Smith*, No. 2:24-cv-567 (M.D. Fla. July 15, 2025), jurisdiction was denied over online defamation claims against nonresidents where content lacked Florida-specific targeting.

b. Section 48.193(1)(a)(6) – Injury from Solicitation. This requires injury in Florida from products or solicitation activities. de Hek did not solicit services in Florida. His calls for “intel” or donations were global and incidental. As part of a global investigation into Goliath, de Hek sent emails and made or received phone calls from New Zealand to businesses, charities, and informants, including some in Florida, for investigative purposes only, seeking public information about Goliath’s dealings, not for commercial solicitations or to establish business relationships in Florida. These were part of a worldwide effort. Goliath’s operations in Florida do not transform de Hek’s New Zealand-based commentary or inquiries into Florida solicitation. Moreover, as a Wyoming entity not registered in Florida (per Florida Department of State records), Goliath’s claimed “Florida injury” is attenuated.

7. Due Process Is Not Satisfied. Even if the statute applies, de Hek lacks “minimum contacts” with Florida such that jurisdiction would offend “traditional notions of fair play and substantial justice.” *Int’l Shoe Co. v. Washington*, 326 U.S. 310, 316 (1945). For intentional torts like defamation, the *Calder* “effects test” requires: (1) an intentional tort; (2)

expressly aimed at Florida; and (3) harm suffered primarily in Florida. *Calder v. Jones*, 465 U.S. 783, 789–90 (1984).

a. de Hek’s content was not “expressly aimed” at Florida. It discusses a Wyoming-registered company, global crypto issues, and uses public sources without Florida-specific outreach. de Hek received unsolicited tips from individuals across the U.S., Canada, and elsewhere, including Florida, and sent investigative emails and made or received phone calls to businesses, charities, and informants for non-commercial purposes as part of a global effort, not to target Florida’s market. These actions, initiated from New Zealand, do not constitute purposeful availment. *See Walden*, 571 U.S. at 285 (knowledge of plaintiff’s forum ties insufficient without forum-directed conduct). Recent 2024–2025 cases reinforce this: In *Johnson v. Global News*, No. 3:24-cv-789 (M.D. Fla. Sept. 10, 2025), jurisdiction was dismissed over online defamation where the defendant had no active Florida ties beyond global posting. In *U.S. v. Asbury*, No. 2:24-cv-432 (M.D. Fla. July 10, 2025), similar claims failed for lack of targeting.

b. Fairness weighs against jurisdiction: The burden on de Hek (a New Zealand resident) is severe, involving international travel and unfamiliar laws, while Florida’s interest is minimal for a non-Florida-registered entity. *Burger King Corp. v. Rudzewicz*, 471 U.S. 462, 477 (1985).

8. de Hek intends to submit an affidavit (**Exhibit 1**) attesting to his lack of Florida contacts, clarifying that investigative emails and phone calls to informants were for

non-commercial purposes and not directed at Florida, shifting the burden to Plaintiff for an evidentiary hearing. *Venetian Salami*, 554 So. 2d at 503. Dismissal is warranted.

II. THE COMPLAINT FAILS TO STATE A CLAIM UPON WHICH RELIEF CAN BE GRANTED (FLA. R. CIV. P. 1.140(b)(6))

9. **Counts I and II (Defamation and Defamation by Implication):** To state a defamation claim, Plaintiff must allege: (1) a false statement of fact; (2) published to a third party; (3) with knowledge of falsity or reckless disregard (actual malice for public figures/matters); and (4) damages. *Jews for Jesus, Inc. v. Rapp*, 997 So. 2d 1098, 1106 (Fla. 2008). Pure opinion, however, is not actionable. *Turner v. Wells*, 879 F.3d 1254, 1262 (11th Cir. 2018) (applying Florida law).

a. de Hek's statements (e.g., "Ponzi theatre," "house of cards") are opinions based on disclosed public facts, such as Goliath's marketing, contracts, and lack of verifiable proof. Florida law protects such commentary: In *Miami Herald Pub. Co. v. Ane*, 458 So. 2d 239, 241 (Fla. 1984), opinions on public concerns are non-actionable if not implying undisclosed defamatory facts. Recent cases confirm: Online critiques labeling businesses as "scams" are opinions if hyperbolic and based on public info. *See Pollard PLLC on Defamation Per Se* (discussing failure to state claim for opinion on social media, accessed Oct. 9, 2025). Plaintiff admits de Hek relied on "open-source material," negating falsity. No actual malice is pled beyond conclusory allegations.

b. As a limited-purpose public figure in crypto investments, Plaintiff must plead actual malice with specificity, which it fails to do. *Michel v. NYP Holdings, Inc.*, 816 F.3d 686, 702 (11th Cir. 2016).

10. **Count III (Tortious Interference):** Requires: (1) existing business relationship; (2) defendant's knowledge; (3) intentional unjustified interference; and (4) damages. *Ethan Allen, Inc. v. Georgetown Manor, Inc.*, 647 So. 2d 812, 814 (Fla. 1994). de Hek's protected speech cannot be "unjustified" interference. Moreover, no specific relationships are identified beyond vague "clients," failing to state a claim.

III. THIS IS A SLAPP SUIT SUBJECT TO EXPEDITED DISMISSAL UNDER § 768.295, FLA. STAT.

11. Florida's anti-SLAPP statute protects free speech on public issues by allowing expedited dismissal of meritless suits. § 768.295(1), Fla. Stat. (public policy against SLAPP suits chilling petition/speech rights). The statute applies to defamation claims where speech addresses public concerns like consumer protection or fraud. *See The Florida Supreme Court Expands Anti-SLAPP Protections* (Apr. 30, 2025, accessed via legal blogs). de Hek's content—exposing alleged crypto scams—is protected under the First Amendment and Art. I, § 4, Fla. Const., as commentary on public interest matters. *See Institute for Free Speech 2025 Report* (anti-SLAPP covers scam exposés, accessed Oct. 9, 2025).

12. This suit is a SLAPP: Filed to silence de Hek's criticism, lacking merit as shown above. de Hek requests an expedited hearing, dismissal, and costs. § 768.295(3)-(4).

IV. DISMISSAL FOR LACK OF CAPACITY TO SUE AS AN UNREGISTERED FOREIGN CORPORATION (FLA. R. CIV. P. 1.140(b)(6))

13. Independent of the above grounds, the Complaint must be dismissed because Goliath lacks capacity to maintain this action. As a Wyoming-incorporated corporation with its principal place of business in Orange County, Florida (Compl. 5), Goliath is a foreign corporation transacting business in Florida without a certificate of authority may not maintain a proceeding in any court in this state until it obtains a certificate of authority.”

14. Goliath admits it is Wyoming-registered but alleges ongoing operations in Florida, including a principal office, blockchain investments, local banking relationships (e.g., Merrill Lynch, Morgan Stanley), and sponsorships like the Vault 2025 Conference in Orlando (Compl. ¶¶ 13-14, 31). These activities constitute “transacting business” under § 607.1501(1), which includes maintaining offices, conducting intrastate operations, or engaging in continuous business. Public records confirm Goliath has no certificate of authority in Florida: A search on the Florida Department of State’s Sunbiz.org database yields no active registration for “Goliath Ventures, Inc.” as a foreign corporation (**Exhibit 2**).

15. Florida courts enforce this “door-closing” provision strictly, dismissing suits by unregistered foreign corporations without prejudice to refiling after compliance. *See Nat’l Fiber Corp. v. Thru-Pass Tech. Corp.*, 604 So. 2d 884, 885 (Fla. 3d DCA 1992) (dismissing for non-registration); *Tavistock Corp. v. Josephthal & Co.*, 534 So. 2d 752, 753 (Fla. 3d DCA 1988) (maintaining Florida office requires registration). Recent applications in 2025 unpublished Orange County cases have dismissed similar claims by out-of-state entities with Florida principal

places of business. Goliath's failure to allege or prove registration is fatal, rendering the Complaint deficient on its face.

16. This defect cannot be cured by amendment without registration, warranting dismissal. de Hek intends to submit an affidavit and Sunbiz search results as evidence.

V. DISMISSAL FOR INSUFFICIENCY OF SERVICE OF PROCESS (FLA. R. CIV. P. 1.140(b)(5))

17. Independent of the above grounds, the Complaint must be dismissed for insufficiency of service of process, as there is no credible evidence that Plaintiff properly served de Hek in New Zealand in accordance with the Hague Service Convention and Florida law. New Zealand is a party to the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters (1965), effective since June 1, 2020, and service on a New Zealand resident in a civil action must comply with its protocols. *See Volkswagenwerk Aktiengesellschaft v. Schlunk*, 486 U.S. 694, 698 (1988); *Fla. R. Civ. P. 1.070*.

18. The Hague Convention requires service through New Zealand's Central Authority (the Ministry of Justice) or an alternative method permitted by New Zealand, such as registered mail with certified translations or private process servers under New Zealand's High Court Rules (Part 6), provided formalities (e.g., court approval, proper documentation) are met. *See Hague Convention, Arts. 5, 10; New Zealand High Court Rules 6.8*. Plaintiff must file proof of service, such as a Central Authority certificate or affidavit, with the Court. *See Hague Convention, Art. 6; Fla. R. Civ. P. 1.070(f)*. To date, there is no court record or credible information indicating that

Plaintiff served de Hek through the Central Authority or any approved method, nor has Plaintiff filed proof of service as required.

19. de Hek is aware of an incident on or about October 10, 2025, where an unidentified individual entered a private place of business in Christchurch, New Zealand, where de Hek is employed, and claimed to serve court papers related to this case. This individual provided no proof of authority, such as credentials identifying them as an authorized process server, nor any documentation indicating compliance with the Hague Service Convention, such as a Central Authority certificate, certified translations, or court-endorsed documents. de Hek intends to submit an affidavit (**Exhibit 3**) attesting that he has not been properly served through the Hague Convention's procedures and that any documents received, including during the shop incident, were delivered via improper means, which do not constitute valid service under the Convention or Florida law. *See Banco Latino, S.A.C.A. v. Gomez Lopez*, 17 F. Supp. 2d 1327, 1330 (S.D. Fla. 1998) (informal notice insufficient). Without proper service, the Court lacks jurisdiction over de Hek, and the Complaint must be dismissed. *See Thompson v. Doe*, 596 So. 2d 1178, 1180 (Fla. 5th DCA 1992).

20. This defect warrants dismissal without prejudice or, alternatively, a stay until Plaintiff effects proper service. de Hek reserves the right to request an evidentiary hearing if Plaintiff claims service was proper. *See Robles-Martinez v. Diaz, Reus & Targ, LLP*, 88 So. 3d 177, 179 (Fla. 3d DCA 2011) (plaintiff bears burden of proving service).

**VI. MOTION FOR PROTECTIVE ORDER AGAINST PLAINTIFF'S
PREMATURE DISCOVERY (FLA. R. CIV. P. 1.280(c))**

21. Plaintiff has filed a Notice of Taking Deposition Duces Tecum, scheduling a deposition of the Records Custodian of OpenAI, LLC for November 4, 2025, to obtain oral testimony and documents (per Exhibits A and B of the Notice). This discovery is premature and unduly burdensome, as the Court has not yet established jurisdiction over de Hek or confirmed proper service of process. See *Venetian Salami*, 554 So. 2d at 502 (jurisdictional issues resolved before discovery); *Banco Latino*, 17 F. Supp. 2d at 1330 (improper service halts proceedings). Under Fla. R. Civ. P. 1.280(c), the Court may issue a protective order to prevent discovery that causes undue burden or expense. The deposition imposes significant burdens on de Hek, a pro se defendant residing in New Zealand, including costs and logistical challenges of participating in discovery across jurisdictions before the Court's jurisdiction is confirmed. de Hek requests that the Court quash the deposition or stay discovery until the motion to dismiss is resolved.

CONCLUSION

For the foregoing reasons, the Complaint should be dismissed with prejudice for lack of personal jurisdiction, insufficiency of service of process, failure to state a claim, and violation of Florida's anti-SLAPP statute, or without prejudice for lack of capacity to sue as an unregistered foreign corporation and improper service. Additionally, de Hek requests a protective order to quash or stay Plaintiff's Notice of Taking Deposition Duces Tecum until jurisdictional and service issues are resolved. Alternatively, dismissal without prejudice is warranted under § 607.1502 and Rule 1.140(b)(5) until Goliath registers and effects proper service.

WHEREFORE, de Hek respectfully requests this Court grant this Motion, dismiss the Complaint with prejudice, or in the alternative without prejudice as to Counts IV and V, issue a protective order quashing or staying Plaintiff's depositions scheduled for November 4, 2025, award de Hek costs pursuant to § 768.295(4), Fla. Stat., and grant such other relief as the Court deems just and proper. In the event the Court determines that dismissal is not warranted on the grounds presented, de Hek respectfully pleads with the Court to grant a 60-day extension of time to respond to the Complaint so that de Hek, as a pro se defendant residing in New Zealand, may retain appropriate legal counsel to adequately defend against this action.

Dated: October 20, 2025

Respectfully submitted,

/s/ Danny de Hek
Danny de Hek, Pro Se

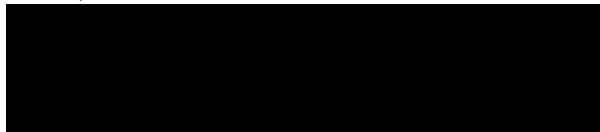


EXHIBIT 1

**IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT IN AND FOR
ORANGE COUNTY, FLORIDA**

GOLIATH VENTURES, INC.,

CASE NO.: 2025-CA-009246-O

Plaintiff,

v.

DANNY DE HEK,

Defendant.

_____ /

**AFFIDAVIT OF DANNY DE HEK IN
SUPPORT OF MOTION TO DISMISS FOR
LACK OF PERSONAL JURISDICTION**

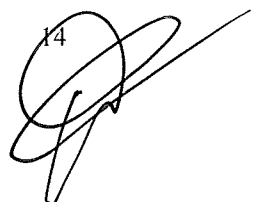
I, Danny de Hek, being of lawful age and duly sworn, depose and state as follows:

1. I am the Defendant in the above-captioned case, appearing pro se, and I reside in Christchurch, Canterbury, New Zealand. I make this affidavit based on personal knowledge to support my Motion to Dismiss the Complaint for lack of personal jurisdiction.
2. I am a citizen and resident of New Zealand and have never resided in the State of Florida.
3. I do not own, lease, or maintain any property, offices, or facilities in Florida.

A handwritten signature in black ink, consisting of a large, stylized 'D' followed by a series of loops and a final vertical stroke.

4. I do not have any employees, agents, or representatives conducting business on my behalf in Florida.
5. I do not conduct systematic or continuous business activities in Florida, nor have I ever maintained a business presence in Florida, such as a bank account, office, or registered agent.
6. The online content referenced in the Complaint, including blog posts, LinkedIn articles, and YouTube videos, was created and published from New Zealand using global platforms accessible worldwide. These materials were not specifically directed at Florida residents or businesses.
7. The content critiques the business model of Goliath Ventures, Inc., a Wyoming-registered corporation, based on publicly available information, such as its website, marketing materials, and investor testimonials. The content addresses global cryptocurrency issues and was not targeted at Florida.
8. I have not solicited business, services, or donations specifically in Florida. Any calls for “intel” or donations in my content were made globally via public platforms and were not directed at Florida residents.
9. As part of my global investigation into Goliath Ventures, Inc., I have received unsolicited tips and communications from individuals across the United States, Canada, and other countries, including some from Florida residents. In response, I sent emails and made or received phone calls from New Zealand to several businesses, charities, and informants, including some in Florida, for investigative purposes only, seeking publicly available information about their dealings with Goliath Ventures. These emails and phone calls were not commercial solicitations but part of a journalistic effort to gather information on Goliath’s activities and were not intended to establish business relationships or solicit services in Florida.

14



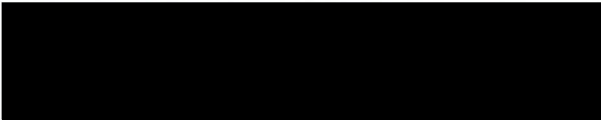
10. Other than the investigative emails and phone calls noted above and responses to unsolicited global communications, I have no contacts with Florida that would subject me to the jurisdiction of Florida courts under the long-arm statute (§ 48.193, Fla. Stat.) or constitutional due process requirements.
11. Defending this lawsuit in Florida would impose a severe burden on me as a New Zealand resident, requiring international travel and engagement with an unfamiliar legal system.

I declare under penalty of perjury under the laws of the State of Florida that the foregoing is true and correct to the best of my knowledge.

Executed on this 20th day of October, 2025, in Christchurch, New Zealand.

/s/

Danny de Hek, Pro Se



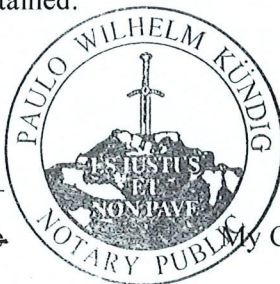
NOTARY CERTIFICATE

On this 20th day of October, 2025, before me, a Notary Public/~~Justice of the Peace~~, personally appeared Danny de Hek, known to me (or satisfactorily proven) to be the person whose name is subscribed to the foregoing instrument, and acknowledged that he executed the same for the purposes therein contained.

[Notary Seal]

/s/

Notary Public/~~Justice of the Peace~~



My Commission Expires: is for life.

Paulo Wilhelm Kündig
Notary Public (New Zealand)
Enrolled Barrister and Solicitor of the High Court
of New Zealand

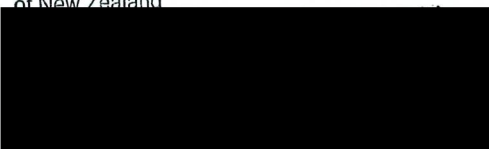


EXHIBIT 2

Detail by Entity Name

DIVISION OF CORPORATIONS



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Search by Entity Name](#) /

Detail by Entity Name

Florida Profit Corporation
GOLIATH VENTURES INC

Filing Information

Document Number	P19000013806
FEI/EIN Number	83-3619628
Date Filed	02/15/2019
State	FL
Status	INACTIVE
Last Event	VOLUNTARY DISSOLUTION
Event Date Filed	09/03/2025
Event Effective Date	09/03/2025

Principal Address

189 S ORANGE AVENUE
1800
ORLANDO, FL 32801

Changed: 04/22/2025

Mailing Address

189 S ORANGE AVENUE
1800
ORLANDO, FL 32801

Changed: 04/22/2025

Registered Agent Name & Address

SAMUELS, HARRY M
2901 STIRLING ROAD
308
FORT LAUDERDALE, FL 33312

Address Changed: 03/20/2023

Officer/Director Detail

Name & Address

Title PRESIDENT

<https://search.sunbiz.org/inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=GOLIATH...>

1/2

Detail by Entity Name

DELGADO, CHRISTOPHER
189 S ORANGE AVENUE
1800
ORLANDO, FL 32801

Annual Reports

Report Year	Filed Date
2023	03/20/2023
2024	04/30/2024
2025	04/22/2025

Document Images

09/03/2025 -- VOLUNTARY DISSOLUTION	View image in PDF format
04/22/2025 -- ANNUAL REPORT	View image in PDF format
04/30/2024 -- ANNUAL REPORT	View image in PDF format
03/20/2023 -- ANNUAL REPORT	View image in PDF format
04/23/2022 -- ANNUAL REPORT	View image in PDF format
09/13/2021 -- Name Change	View image in PDF format
04/20/2021 -- ANNUAL REPORT	View image in PDF format
04/10/2020 -- ANNUAL REPORT	View image in PDF format
02/15/2019 -- Domestic Profit	View image in PDF format

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[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Search By Entity Name](#) /

[Next List](#)

Entity Name List

Corporate Name	Document Number	Status
GOLIATH VENTURES, INC.	P05000053984	INACT
GOLIATH VENTURES INC	P17000005903	INACT
GOLIATH VENTURES INC	P19000013806	INACT
GOLIATH VOLUSIA HOLDINGS LLC	L19000281771	Active
GOLIATH MASSAGE AND REHAB. INC	P11000025459	INACT
GOLIATH MEDICAL SERVICES INC	P95000077090	INACT
GOLIATH TRUCKS INC	P21000095942	INACT
GOLIBART INC.	P21000077307	Active
GOLIBER INTERNATIONAL, INC.	P04000100896	INACT
GOLIC EXPRESS LLC	L22000438910	Active
THE GOLIC GROUP, INC.	P94000004594	INACT
GOLICH GLASS AND SHELVING, INC.	F07000000260	INACT
GOLICK LLC	L10000099707	NAME HS
GOLICO INC	355359	INACT
GO LIDER CORP	N22000006256	INACT
GOLIE, INC.	P15000075468	INACT
GOLIEB, LLC	L12000149030	INACT
GOLIERI GROUP L.L.C.	L18000137841	InActive
GOLIFE, LLC	L18000148973	Active
GO LIFE BELFORT LLC	L21000211843	Active

[Next List](#)

Florida Department of State, Division of Corporations

EXHIBIT 3

**IN THE CIRCUIT COURT OF THE NINTH JUDICIAL
CIRCUIT IN AND FOR ORANGE COUNTY, FLORIDA**

GOLIATH VENTURES, INC.,

CASE NO.: 2025-CA-009246-O

Plaintiff,

v.

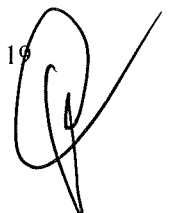
DANNY DE HEK,

Defendant.

**AFFIDAVIT OF DANNY DE HEK
IN SUPPORT OF MOTION TO DISMISS
FOR INSUFFICIENCY OF SERVICE OF PROCESS**

I, Danny de Hek, being of lawful age and duly sworn, depose and state as follows:

1. I am the Defendant in the above-captioned case, appearing pro se, and I reside in Christchurch, Canterbury, New Zealand. I make this affidavit based on personal knowledge to support my Motion to Dismiss the Complaint for insufficiency of service of process.
2. To the best of my knowledge, I have not been served with the Complaint in *Goliath Ventures, Inc. v. Danny de Hek* through New Zealand's Central Authority (the Ministry of Justice) or any method compliant with the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters (1965), to which New Zealand is a party.

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3. On or about October 10, 2025, an unidentified individual entered a private place of business in Christchurch, New Zealand, where I am employed, and claimed to serve me with court papers related to this case. This individual provided no proof of authority, such as credentials identifying them as an authorized process server, nor any documentation indicating compliance with the Hague Service Convention, such as a Central Authority certificate, certified translations, or court-endorsed documents.
4. To the best of my knowledge, the documents delivered during this incident, if any, were not served in accordance with the Hague Service Convention's requirements, including service through the New Zealand Central Authority or alternative methods permitted under New Zealand's High Court Rules (Part 6), such as registered mail with certified translations or private process servers with proper authorization.
5. I have not received any other documents related to this case through methods compliant with the Hague Service Convention or Florida law, such as *Fla. R. Civ. P. 1.070*.
6. I have not seen any proof of service, such as a Central Authority certificate or affidavit of service, filed with the Court to indicate that proper service was effected.
7. Based on the foregoing, I have not been properly served with the Complaint, and the Court lacks jurisdiction over me in this matter.

A handwritten signature in black ink, located in the bottom right corner of the page. The signature is stylized and appears to be a cursive representation of a name.

I declare under penalty of perjury under the laws of the State of Florida that the foregoing is true and correct to the best of my knowledge.

Executed on this 20th day of October, 2025, in Christchurch, New Zealand.

/s/

Danny de Hek, Pro Se



NOTARY CERTIFICATE

On this 20th day of October, 2025, before me, a Notary Public/~~Justice of the Peace~~, personally appeared Danny de Hek, known to me (or satisfactorily proven) to be the person whose name is subscribed to the foregoing instrument, and acknowledged that he executed the same for the purposes therein contained.

[Notary Seal]

/s/

Paulo Wilhelm Kündig
Notary Public/~~Justice of the Peace~~ My Commission Expires: is for life.



Paulo Wilhelm Kündig
Notary Public (New Zealand)
Enrolled Barrister and Solicitor of the High Court



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been furnished directly via e-mail to the Plaintiff's counsel of record, as noted below, and via Florida Courts e-Filing Portal.

Plaintiff's Counsel of Record:

Oliver Birman, Esq.,
obirman@pbyalaw.com

Designated E-Service:
eserviceftl@pbyalaw.com

Perlman, Bajandas, Yevoli & Albright, P.L.
200 S. Andrews Avenue, Suite 600
Fort Lauderdale, Florida 33301

Dated: October 20, 2025

Respectfully submitted,

/s/ Danny de Hek
Danny de Hek, Pro Se

A solid black rectangular box used to redact the signature of Danny de Hek.

danny@dehek.com