

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.

Plaintiff's Initial Disclosures

Plaintiff, Goliath Ventures, Inc ("Goliath"), pursuant to Florida Rule of Civil Procedure 1.280, hereby provide their Initial Disclosures for this action.

I. Individuals with Discoverable Information (Fla. R. Civ. P. 1.280(a)(1)(A))

1. Chris Delgado

Address: c/o Perlman Bajandas Yevoli & Albright P.L., Attention Oliver Birman and David Robbins, 200 S. Andrews Avenue, Suite 600, Fort Lauderdale, FL 33301

Telephone: (954) 566-7117

Email: obirman@pbyalaw.com; drobbins@pbyalaw.com; jbordner@pbyalaw.com

Subjects of Information: Mr. Delgado has knowledge regarding the formation, operations, and business model of Goliath Ventures, Inc., including its investment strategies, client engagement practices, compliance protocols, and marketing initiatives. He is familiar with the company's cryptocurrency-related activities, including liquidity pool provisioning, mining operations, and partnerships. Mr. Delgado also has direct knowledge of the defamatory statements made by Defendant Danny De Hek, the impact of those statements on Goliath and its clients, and the resulting reputational and economic harm. In addition, he is familiar with Goliath's business relationships, contractual arrangements, and investor relations, including any communications with third parties regarding Defendant's accusations.

2. Corporate Representative of Goliath Ventures, Inc.

Address: c/o Perlman Bajandas Yevoli & Albright P.L., Attr: Oliver Birman and David Robbins, 200 S. Andrews Avenue, Suite 600, Fort Lauderdale, FL 33301

Telephone: (954) 566-7117

Email: obirman@pbyalaw.com; drobbins@pbyalaw.com; jbordner@pbyalaw.com

Subjects of Information: The corporate representative of Goliath Ventures, Inc.

possess knowledge concerning the structure and governance of the company, its compliance with regulatory obligations (including those related to FinCEN and securities laws), and the company's fidelity bond coverage and internal risk management processes. The representative is also expected to have knowledge of the specific contracts and joint venture agreements at issue, including the principal guarantee provisions, client onboarding practices, and how investment proceeds were used. Additionally, the representative can address Goliath's responses to De Hek's accusations, the nature and substance of Goliath's legitimate business operations, and the financial impact of De Hek's defamatory campaign.

3. Danny De Hek

Address: [REDACTED]

Telephone: Unknown at this time

Email: danny@dehek.com

Subjects of Information: Mr. De Hek possesses knowledge concerning the creation, publication, and distribution of multiple defamatory statements made against Goliath Ventures, Inc. through online platforms, including but not limited to LinkedIn and YouTube. This includes statements made in articles, posts, videos, and events from September 2, 2025, through at least September 17, 2025. Mr. De Hek is believed to have knowledge of the sources (or lack thereof) relied upon in creating the defamatory content, his communications with third parties about Goliath, and any financial or promotional arrangements with individuals or entities hostile to Plaintiffs. He is also expected to have knowledge of the intended audience and purpose of the defamatory campaign, including efforts to interfere with Plaintiffs' clients, investors, and business partners.

4. Matt Burks

Address: Unknown at this time

Telephone: Unknown at this time

Email: Unknown at this time

Subjects of Information: Mr. Burks is referenced throughout Defendant's defamatory articles as being affiliated with BlackBlock and allegedly involved in audits, compliance certifications, and internal operations of Goliath. He is falsely accused of "skimming profits" and participating in fraudulent conduct. Mr. Burks is expected to have discoverable information concerning: (a) the relationship between BlackBlock and Goliath; (b) the legitimacy of any audits or financial oversight performed; and (c) the falsity of the claims made by Defendant concerning Mr. Burks's involvement.

5. Nadia Bringas

Address: c/o Perlman Bajandas Yevoli & Albright P.L., Attn: Oliver Birman and David Robbins, 200 S. Andrews Avenue, Suite 600, Fort Lauderdale, FL 33301

Telephone: (954) 566-7117

Email: obirman@pbyalaw.com; drobbins@pbyalaw.com; jbordner@pbyalaw.com

Subjects of Information: Ms. Bringas is identified by Defendant as the bookkeeper for Goliath and is falsely associated with fraudulent activity solely based on that role. She is likely to possess information regarding: (a) the financial recordkeeping practices of Goliath; (b) the accuracy and transparency of internal books and accounting systems; and (c) the defamatory nature of Defendant's statements, including the false claims that she knowingly participated in a Ponzi scheme.

6. Sandeep M

Address: Unknown at this time

Telephone: Unknown at this time

Email: Unknown at this time

Subjects of Information: Sandeep M was specifically named in Defendant's online publications as having "fallen for" the alleged Ponzi scheme. Sandeep M is believed to have information regarding: (a) his relationship or dealings with Goliath; (b) whether he relied on or was affected by Defendant's statements; and (c) the reputational or economic impact of Defendant's campaign on actual or prospective client relationships.

7. Kush M

Address: Unknown at this time

Telephone: Unknown at this time

Email: Unknown at this time

Subjects of Information: Kush M was specifically named in Defendant's online publications as having "fallen for" the alleged Ponzi scheme. Kush M is believed to have information regarding: (a) his relationship or dealings with Goliath; (b) whether he relied on or was affected by Defendant's statements; and (c) the reputational or economic impact of Defendant's campaign on actual or prospective client relationships.

8. Dianna Desboyaux

Address: c/o counsel for non-party Desboyaux, Jack Andreas Brumbein, Esq., Krumbien Law PLLC, 12724 Gran Bay Parkway West, Suite 410, Jacksonville, FL 32258

Telephone: (407)800-7589

Email: jack@jackandreaskrumbein.com

Subjects of Information: Ms. Desboyaux was specifically named in Defendant's online publications and is believed to have information about : (a) his relationship or dealings with Goliath; (b) whether he relied on or was affected by Defendant's statements; and (c) the reputational or economic impact of Defendant's campaign on actual or prospective client relationships.

9. Neal Sandhu

[REDACTED]
[REDACTED]
[REDACTED]

Subjects of Information: Mr. Sandhu is anticipated to have information about how Mr. De Hek obtained any information about Goliath, the defamatory conduct of Mr. De Hek, Goliath's joint venture agreements, investments, and related issues.

II. Relevant Documents (Fla. R. Civ. P. 1.280(a)(1)(B))

A. In Plaintiff's Possession

1. All public false, defamatory comments
2. Copies of Goliath's Sample Joint Venture Agreements
3. Certain financials for Goliath, including quickbooks documents, bank statements, etc.
4. Premature withdrawals on joint venture investments based on the conduct described herein
5. All work performed by BlackBlock.
6. Goliath's Retention Policies
7. Any incorporating documents, corporate resolutions, and shareholder.

B. Not in Plaintiffs' Possession

1. All posts, videos, articles, or events concerning Goliath published in any way
2. Analytics and monetization data from Defendant's social media platforms
3. Communications with Alleged "Sources"
4. Non-privileged communications between Mr. De Hek and any third parties concerning the alleged defamatory statements
5. All documents that Mr. De Hek will rely on to substantiate that a Ponzi scheme is being committed.
6. Drafts and Internal Notes Related to Articles, Posts, Events, and Videos

III. Damages (Fla. R. Civ. P. 1.280(a)(1)(C))

1. Goliath has suffered significant economic harm due to Defendant's defamatory statements, including the withdrawal of hundreds of millions in client funds and investments. These withdrawals occurred following the publication and dissemination of false accusations that Goliath was operating a Ponzi scheme. Plaintiff reserves the right to amend and supplement this amount of as discovery progresses. Goliath seeks recovery of lost profits and investment returns that would have been earned had those funds remained under management. The precise measure of lost profit is subject to expert analysis and will be supplemented accordingly.

2. Defendant's campaign has caused severe reputational harm and damage to Plaintiff's business reputation and standing within the cryptocurrency, financial services communities, as well as in the Orlando area at large. Multiple business relationships have been disrupted or terminated. Goliath has experienced the loss of existing and prospective client relationships, as well as increased difficulty forming new partnerships.

3. Defendant's statements falsely accused Plaintiffs of criminal activity, fraud, and unethical business practices, constituting defamation *per se* under Florida law. As such, damages are presumed, and Plaintiffs seek recovery for emotional distress, humiliation, and damage to reputation even apart from economic losses.

4. As outlined in Count III of the Complaint, Defendant has tortiously interfered with specific client relationships, including but not limited to clients and prospects who terminated transactions or investment commitments after consuming Defendant's content. Defendant also tortiously interfered with Goliath's banking relationships and charity relationships. The amount of tortious interference damages that are separate and apart from the defamation damages will be substantiated through discovery and client testimony.

5. Plaintiff intends to seek leave to assert a claim for punitive damages under Florida law. Defendant acted with actual malice and willful disregard for the truth, publishing false and inflammatory content repeatedly over an extended period. Plaintiff will seek to punish and deter such conduct.

IV. Applicable Insurance Policies (Fla. R. Civ. P. 1.280(a)(1)(D))

None.

Certificate of Service

I Hereby Certify that a true and correct copy of the foregoing document was served via email to all counsel of record.

Dated: September 26, 2025

Respectfully submitted,

/s/ Oliver M. Birman

Oliver M. Birman (FBN 123750)

obirman@pbyalaw.com

David M. Robbins (FBN 1012340)

[drobbins@pbyalaw.com](mailto:d Robbins@pbyalaw.com)

PERLMAN, BAJANDAS, YEVOLI &
ALBRIGHT

283 S. Catalonia Ave.

Suite 200

Coral Gables, FL 33134

Attorneys for Plaintiffs