

## RESPONDENT'S REPLY TO APPLICANT'S SUBMISSIONS

CIV-2025-059-000176 – Ellis v De Hek

**Filed by:** Danny de Hek – Respondent

**Date:** 23 Oct 2025

1. I have reviewed the applicant's written submissions dated 22 October 2025. I reject the characterisations and allegations made against me.
2. I have never promoted, endorsed, or participated in any cryptocurrency or multi-level marketing opportunity. I am an investigative journalist whose work focuses on exposing fraudulent schemes. My reporting has been published or referenced by *The New York Times*, *Bloomberg*, *The Guardian*, *news.com.au* and the *New Zealand Law Society*, which profiled my success in defending a \$3.85 million SLAPP-type gag lawsuit brought to silence whistle-blowing.
3. The material complained of is factual, evidence-based, and presented in the public interest. The applicant himself now admits in paragraph 2 of his submission that he "falsified a reference for a potential new client." That admission confirms that the central statements in my publication were substantially true.
4. The applicant's further references to a person named Matthew Edwards and "Mars Digital" are irrelevant to this proceeding and have no connection to the matters before the Court. I have never harassed the applicant or any associate; I have simply reported verifiable information.

4A. The applicant's reference to "Matthew Edwards of Mars Digital" and the claim that I was "ordered to remove a defamatory article and video" are entirely false. No police complaint was ever made or upheld, and I have never been ordered by any authority or court to remove any content. The YouTube video referred to was geo-restricted by YouTube in response to a standard privacy complaint lodged via Google's internal process, not by police or judicial order. The content remains available to international viewers at the same URL (<https://youtu.be/ZhDhquwe9gl>).

5. The suggestion that I would record or publish court proceedings is unfounded and offensive. I have the utmost respect for the judicial process and would never breach a court order or protocol.
6. Preparing this affidavit and evidential bundle has required more than 24 hours of work. As a self-represented respondent with dyslexia, I relied on external assistance to ensure clarity and accuracy. I request that the Court note the time and cost burden placed on me by what appears to be a misuse of process, intended to discourage legitimate investigative reporting. At my standard professional rate of NZ \$120 per hour + GST, I seek reimbursement of NZ \$2,880 + GST for time incurred in responding to this unfounded application.
7. I respectfully submit that the application should be dismissed in its entirety. The applicant's own admission and the documentary evidence filed demonstrate that my reporting was truthful, responsible, and within the

bounds of fair comment and public interest.

**Signed:** 

Danny de Hek – Respondent

Christchurch, New Zealand