

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 6:26-mj-1240-LHP

CHRISTOPHER ALEXANDER DELGADO

**UNITED STATES' MOTION FOR ADDENDUM  
TO APPEARANCE BOND (DOCS. 13-14)**

The United States of America, pursuant to 18 U.S.C. § 3142(c)(3), moves this Honorable Court to require the defendant, Christopher Alexander Delgado, to surrender the following assets to the United States in accordance with the Court's order (Docs. 13-14):

**A. Vehicles Located in the United States<sup>1</sup>**

1. 2025 Escalade V, Vehicle Identification Number ("VIN")  
1GYS9HR95SR147650, registered to Goliath Ventures, Inc.;
2. 2024 Rolls Royce Ghost, VIN SCATD6C02RU222648, registered to  
Goliath Ventures, Inc. and Christopher Delgado;
3. 2024 Lamborghini Huracán, VIN ZHWUT4ZFXRLA26330, registered  
to Christopher Delgado;

---

<sup>1</sup> Christopher Delgado has agreed to surrender these vehicles and all keys/key fobs to a Special Agent of the Internal Revenue Service, Criminal Investigation not later than March 6, 2026, or March 16, 2026, if the vehicle is currently used by a family member. The United States has already taken possession of the 2024 Rolls Royce Ghost.

4. 2024 Bentley Bentayga, VIN SJAHT2ZV0RC025272, registered to Christopher Delgado;
5. 2024 Lincoln Navigator L, VIN 5LMJJ3TG2REL19131, registered to Goliath Ventures, Inc.;
6. 2023 Rolls Royce Cullinan, VIN SLATV4C02PU217321, registered to Christopher Delgado;
7. 2022 Mercedes Benz Sprinter, VIN W1X8EC3Y6NT121984, registered to Goliath Ventures, Inc.;
8. 2017 Mercedes Benz C300, VIN 55SWF4JBXHU230429, registered to A.S.;
9. 2022 GMC Sierra HD, VIN 1GT49PEY2NF310721, registered to D.S.;  
and
10. 1951 Mercury, VIN 51DA24185M, registered to D.S.;

**B. Foreign Assets**

11. 2023 Ferrari 296 GTS, VIN ZFF01SMB000291713;
12. 2023 Cadillac Escalade, VIN 1GYS47KLXPR263920;<sup>2</sup> and
13. Watches and Jewelry<sup>3</sup>

---

<sup>2</sup> The United States and Christopher Delgado agree that it is impracticable to repatriate these vehicles. Therefore, the parties have agreed that Christopher Delgado shall arrange for the vehicles to be sold at a price approved by the United States and the funds transferred directly to the Internal Revenue Service-Criminal Investigation.

<sup>3</sup> Christopher Delgado, through an authorized representative, shall deliver these items and any related documents (including, but not limited to, receipts, warranty information, registration documents, and original packaging) to an Internal Revenue

*a. Watches*

- i. Audemars Piguet Royal Oak Selfwinding Chronograph watch with smoked blue “Grande Tapisserie” dial and diamond bezel;
- ii. Audemars Piguet Royal Oak Frosted Gold Double Balance Wheel Openworked watch;
- iii. Audemars Piguet Royal Oak Selfwinding Chronograph pink gold watch fully set with brilliant-cut diamonds;
- iv. Audemars Piguet Royal Oak Concept Split-Seconds Chronograph GMT Large Date carbon and gold watch;
- v. Audemars Piguet Royal Oak “Jumbo” Extra-Thin gold watch with a smoked yellow-gold-toned “Petite Tapisserie” dial;
- vi. Rolex Daytona watch with rainbow bezel;
- vii. Rolex Yacht-Master Oysterflex “Cotton Candy” Baguette Diamond white gold watch;
- viii. Rolex Oyster Perpetual Day-Date watch in gold with a chocolate, diamond-set dial, diamond-set bezel, and diamond-set President bracelet;

---

Service, Criminal Investigations Attaché at the United States Embassy.

- ix. Rolex Oyster Perpetual Day-Date platinum watch with Arabic dial, trapeze diamond-set bezel, and a President bracelet;
- x. Rolex Oyster Perpetual Day-Date 40mm white gold watch with Mother of Pearl dial, diamond-set bezel, and a President bracelet;
- xi. Rolex Yacht-Master 40 mm Everose gold watch with diamond-paved dial and Oysterflex bracelet;
- xii. Rolex Oyster Perpetual Day-Date 40 mm watch in 18kt yellow gold, with a diamond-paved dial, diamond-set bezel, and a President bracelet;
- xiii. Rolex Oyster Perpetual Day-Date 36 mm watch in platinum, with an ice-blue, diamond-set dial, diamond-set bezel, and a President bracelet;
- xiv. Rolex Oyster Perpetual Day-Date 36 mm platinum watch with silver dial, trapeze diamond-set bezel, and a President bracelet;
- xv. Rolex Oyster Perpetual Day-Date 40 mm watch in 18 kt yellow gold, fluted bezel, with champagne-colour dial, fluted bezel, and a President bracelet;

- xvi. Jacob & Co. Astronomia Solar Bitcoin 44 mm Watch in titanium blacked out with DLC, black alligator leather band;
- xvii. Jacob & Co. Casino Roulette Tourbillon Watch with black alligator leather band; and
- xviii. Jean Schlumberger by Tiffany & Co. Bird on a Rock Diamond watch with black leather band;

*b. Necklaces*

- i. Tiffany & Co. Titan by Pharrell Williams Necklace in Titanium, Gold, and Diamonds;
- ii. Tiffany & Co. HardWear Graduated Link Necklace in White Gold with Pavé Diamonds;
- iii. Tiffany & Co. Jean Schlumberger Gold and Diamond Necklace;
- iv. Tiffany & Co. Titan by Pharrell Williams Necklace in 18k Yellow Gold with Diamonds;
- v. Tiffany & Co. Tiffany 1837 Makers I.D. Tag Pendant in yellow gold with Goliath logo on a yellow gold beaded chain;

*c. Cufflinks*

- i. Three pairs of Goliath Logo Cufflinks;
- ii. One pair of Rolls Royce Cufflinks;

- iii. One pair of Christian Dior Logo Cufflinks; and
- iv. One pair of Louis Vuitton Cufflinks;
- v. One pair of round Cartier Santos-style Cufflinks;

d. *Bracelets*

- i. Tiffany & Co. Titan by Pharrell Williams Bracelet in Titanium, Gold, and Diamonds;
- ii. Tiffany & Co. Titan by Pharrell Williams Bracelet in 18k Yellow Gold with Diamonds;
- iii. Tiffany & Co. Jean Schlumberger Gold and Diamond Bracelet;
- iv. Tiffany & Co. Tiffany T1 bangle in white gold with baguette and pavé diamonds;
- v. Tiffany & Co. Tiffany T1 wide diamond hinged bangle in white gold with emeralds;
- vi. Tiffany & Co. Tiffany T1 wide diamond hinged bangle in white gold;
- vii. Tiffany & Co. Tiffany Lock bangle in white gold with full pavé diamonds;
- viii. Tiffany & Co. Tiffany T pavé diamond square bracelet in yellow gold;
- ix. Bvlagari Serpenti Viper Bracelet in 18k white gold set with full pavé diamonds;

- x. Bvlagari Serpenti Viper Bracelet in 18k rose gold set with full pavé diamonds;
- xi. Van Cleef & Arpels Vintage Alhambra Bracelet, 5 Motifs in 18K yellow gold, diamond, and malachite;
- xii. Van Cleef & Arpels Vintage Alhambra Bracelet, 5 Motifs in 18K gold, diamond, mother-of-pearl (dark);

*e. Earrings*

- i. One pair of Louis Vuitton Princess Cut Diamond Stud Star cut Earrings; and
  - ii. One pair of Louis Vuitton Volt One Stud White Gold and Diamond Earrings;
- f. Tiffany & Co. Jean Schlumberger Gold and Gem Set Fish Brooch; and
- g. Men's Diamond Encrusted Goliath Logo Ring.

This motion is unopposed. As the United States continues to review the defendant's assets, the undersigned may move this Honorable Court to include more assets.

WHEREFORE, the United States respectfully requests this Honorable Court enter an order amending the defendant's conditions of pretrial release to include surrendering the above-listed assets to the United States.

Respectfully submitted,

GREGORY W. KEHOE  
United States Attorney

By: /s/ Hannah Watson  
Hannah Watson  
Assistant United States Attorney  
Florida Bar No. 0123632  
35 SE 1st Avenue, Suite 300  
Ocala, Florida 34471  
Telephone: (352) 547-3600  
Facsimile: (352) 547-3623  
E-mail: Hannah.Watson@usdoj.gov

**U.S. v. Christopher Alexander Delgado**

**Case No. 6:26-mj-1240-LHP**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 2, 2026, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

Sean P. Shecter, Esq

Maurice A. Johnson, Esq.

I hereby certify that on March 2, 2026, a true and correct copy of the foregoing document and the notice of electronic filing were sent by Hand Delivery to the following non-CM/ECF participant(s):

N/A

/s/ Hannah Watson

Hannah Watson

Assistant United States Attorney

Florida Bar No. 0123632

35 SE 1st Avenue, Suite 300

Ocala, Florida 34471

Telephone: (352) 547-3600

Facsimile: (352) 547-3623

E-mail: Hannah.Watson@usdoj.gov