

JUN 23 2026 PM 8:10
FILED - USDC - FLMD - ORL

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 6:26-cr- **158-GAP-NWH**
18 U.S.C. § 1349
18 U.S.C. § 1343
18 U.S.C. § 1957

CHRISTOPHER ALEXANDER DELGADO

INFORMATION

The United States Attorney charges:

COUNT ONE
(Conspiracy to Commit Wire Fraud)

A. Introduction.

1. At all times relevant to this Information, Christopher Alexander Delgado (DELGADO) was the founder, president, and chief executive officer of Goliath Ventures, Inc. (GOLIATH), a company incorporated first in Florida and later in Wyoming. Delgado represented to the public that Goliath was a joint-venture cryptocurrency investment enterprise operating decentralized finance liquidity pools. In truth, GOLIATH was a large-scale Ponzi scheme through which DELGADO and others, known and unknown to the United States, solicited at least \$250 million from over 1,000 victim investors through materially false and fraudulent pretenses, representations, and promises.

B. General Allegations

2. The defendant, Christopher Alexander DELGADO was a citizen of the United States who primarily resided in Orlando, Florida.

3. Goliath Ventures, Inc. (“Goliath”), formerly known as Gen-Z Venture Firm, was a Florida corporation, later reincorporated in Wyoming, that purported to invest in blockchain and cryptocurrency projects.

4. Christopher Alexander DELGADO served as the President and Chief Executive Officer of Goliath and held ultimate control over Goliath’s finances and business decisions.

5. From at least January of 2023 and continuing through at least January of 2026, Goliath, through DELGADO and co-conspirators known to the United States, began promoting purported investment opportunities in liquidity pools.

6. Goliath required investors to sign “Joint Venture Agreements” with Goliath, become “Partners,” and invest money, typically a minimum of \$100,000, to gain access to these purported opportunities.

7. Investors were led to believe that after transferring their money to Goliath’s bank accounts, their money would be converted into cryptocurrency, transferred to an “encrypted ledger,” and then placed into cryptocurrency liquidity pools.

8. Goliath represented that the liquidity pools would generate guaranteed monthly returns which investors could either withdraw or leave in the liquidity pools to generate even greater returns.

9. Between January 2023 and January 2026, at least 1,000 investors transferred at least \$250 million to Goliath for investment in liquidity pools.

10. A portion of the funds were converted into cryptocurrency and retained within Goliath's cryptocurrency wallets; the majority of the funds sat as cash in Goliath's bank accounts.

11. Goliath did not invest the cash or cryptocurrency funds but instead used the money to pay for DELGADO's and his co-conspirators' luxury travel and purchases, lavish corporate events, Goliath's officers and employees' salaries and commissions, and to pay out distributions to investors which Goliath falsely represented had been generated through cryptocurrency liquidity pools.

C. The Conspiracy

12. Beginning no later than in or about January 2023 and continuing until at least January 2026, in the Middle District of Florida and elsewhere, the defendant,

CHRISTOPHER ALEXANDER DELGADO,

and others known to the United States, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit wire fraud in violation of 18 U.S.C. § 1343.

D. Manner and Means of the Conspiracy

13. The manner and means by which the defendant and other conspirators sought to accomplish the conspiracy included, among others, the following:

a. It was part of the conspiracy that the conspirators would solicit prospective investors in person and over the internet to enter “Joint Venture Agreements” with Goliath.

b. It was further part of the conspiracy that the conspirators would falsely represent to investors that funds invested through the Joint Venture Agreements would be converted into cryptocurrency, be invested in cryptocurrency liquidity pools, and would generate guaranteed monthly returns.

c. It was further part of the conspiracy that the conspirators would create an online portal and mobile application which would display fictitious balance and return information to investors, creating the illusion of profitable returns.

d. It was further part of the conspiracy that rather than invest the investors’ funds as represented, the conspirators would retain the investors’ money as cash or cryptocurrency in Goliath’s bank accounts and cryptocurrency wallets.

e. It was further part of the conspiracy that the conspirators would use the investors’ money to pay for luxury travel, events, vehicles, and other goods for their personal enrichment and to lure in additional investors through a projected image of success.

f. It was further part of the conspiracy that the conspirators would use the investors’ remaining funds to pay monthly distributions to investors, falsely representing that the distributions were returns generated by investment activity.

In violation of 18 U.S.C. § 1349.

COUNT TWO
(Wire Fraud)

A. Introduction

1. The paragraphs in Sections A and B of Count One of this Information are hereby realleged and incorporated by reference as though fully set forth herein.

B. Scheme and Artifice

2. From at least in or about January 2023, through at least in or about January 2026, in the Middle District of Florida and elsewhere, the defendant,

CHRISTOPHER ALEXANDER DELGADO,

did knowingly and intentionally devise and participate in a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises about material facts.

C. Manner and Means

3. The manner and means by which the defendant sought to accomplish the scheme and artifice, included, among others, the paragraphs in Section D of Count One of this Information, said paragraphs are hereby realleged and incorporated by reference as though fully set forth herein.

D. Interstate Wire

On or about September 3, 2025, in the Middle District of Florida and elsewhere, the defendant,

CHRISTOPHER ALEXANDER DELAGO,

knowingly and intentionally executed the aforesaid scheme and artifice, by transmitting and causing to be transmitted, by means of wire and radio communications in interstate and foreign commerce, the writings, signs, signals, pictures, and sounds, to wit: an electronic wire transfer in the amount of \$500,000 from Victim Investor #1's bank account ending in 3883 at Financial Institution #2 to Goliath's bank account ending in 1353 at Financial Institution #1.

In violation of 18 U.S.C. § 1343.

COUNT THREE

The paragraphs in Counts One and Two of this Information are hereby realleged and incorporated by reference as though fully set forth herein.

On or about September 5, 2025, in the Middle District of Florida and elsewhere, the defendant,

CHRISTOPHER ALEXANDER DELGADO,

knowingly engaged and attempted to engage in a monetary transaction that affected interstate commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, within the United States, that is, wire fraud, in violation of 18 U.S.C. § 1343, to wit, the purchase of real property located in Windermere, Florida, for approximately \$8,500,000.

In violation of 18 U.S.C. § 1957(a) and (b).

FORFEITURE

1. The allegations contained in Counts One through Three of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture, pursuant to the provisions of 18 U.S.C. §§ 981(a)(1)(C), 982(a)(1), and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 18 U.S.C. §§ 1349 or 1343, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

3. Upon conviction of a violation of 18 U.S.C. § 1957, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property.

4. The property to be forfeited includes, but is not limited to, an order of forfeiture for at least \$250 million, which represents the proceeds Delgado obtained from the wire fraud scheme charged in Counts One and Two, as well as the following assets which constitute or are derived from proceeds of those counts:

I. Real Property

1. The real property located at 5271 Isleworth Country Club Drive, Windermere, Florida 34786;¹
2. The real property located at 141 S. Phelps Avenue, Winter Park, Florida 32789;

¹ This property is also subject to forfeiture as property involved in the illegal monetary transaction charged in Count Three.

3. The real property located at 17416 Bal Harbour Drive, Winter Garden, Florida 34787;
4. The real property located at 222 Pawnee Trail, Kissimmee, Florida 34747;
5. The real property located at 189 S. Orange Avenue, Units 1800S, 1810S, 1820S, and 1870S, Orlando, Florida 32801, and all associated parking spaces;
6. The real property located at 7333 Bella Foresta Place, Sanford, Florida 32771;
7. The real property located at 746 Cavan Drive, Apopka, Florida 32703 (approximately \$77,800.00 in proceeds was used to pay the mortgage on this property); and
8. The real property located at 2142 Country Side Drive, Apopka, Florida 32712 (approximately \$89,949.53 in proceeds was used to pay the mortgage on this property).

II. Vehicles

1. 2025 Lamborghini Revuelto, VIN: ZHWUC1ZM9SLA02300;
2. 2024 Rolls Royce Ghost, VIN: SCATD6C02RU222648;
3. 2024 Bentley Bentayga, VIN: SJAHT2ZV0RC025272;
4. 2024 Lamborghini Huracán EVO Spyder, VIN: ZHWUT4ZFXRLA26330;
5. 2025 Cadillac Escalade V, VIN: 1GYS9HR95SR147650;
6. 2024 Lincoln Navigator L, VIN: 5LMJJ3TG2REL19131;
7. 1951 Mercury, VIN: 51DA24185M;
8. 2017 Mercedes Benz C300, VIN: 55SWF4JBXHU230429;
9. 2023 Rolls Royce Cullinan, VIN: SLATV4C02PU217321;

10. 2022 Mercedes Benz Sprinter, VIN: W1X8EC3Y6NT121984;
and
11. 2022 GMC Sierra HD, VIN: 1GT49PEY2NF310721.

III. Wire Transfers

1. \$166,861.35 from Goliath Ventures International Account 30000849574 wired to the Internal Revenue Service (“IRS”) from Christopher Delgado on or about February 25, 2026;
2. \$596,532.00 wired to the IRS from Christopher Delgado’s Emirates NBD High Interest Yield Account 1015880399401 on or about February 27, 2026;
3. \$585,099.00 from Emirates NBD High Interest Yield Account 1015880399401 deposited by Christopher Delgado into the Court Registry on or about June 2, 2026, plus any accrued interest;
4. Net proceeds from the sale of the 2023 Ferrari 296 GTS, Vehicle Identification Number, VIN: ZFF01SMB000291713; and
5. Net proceeds from the sale of the 2023 Cadillac Escalade, VIN: 1GYS47KLXPR263920.

IV. Cryptocurrency

1. 2.116437636 Ethereum (ETH) in MetaMask Wallet Address 0xDec...9CA7;
2. 77,123,760 Medieval Empires (MEE) tokens in MetaMask Wallet Address 0xDec...9CA7; and
3. 8,709.08 USD (USDC) in MetaMask Wallet Address 0xDec...9CA7nt.

V. Return of Charitable Donations

1. \$255,000.00 Cashier’s Check from Alliance Bank of Arizona, which represents a donation returned from Victoria’s Voice Foundation;

2. \$10,000.00 Cashier's Check from PNC Bank, which represents a donation returned from Life and Liberty; and
3. \$25,000.00 Cashier's Check from PNC Bank, which represents donation returned from Conservative Solutions for Florida.

VI. Personal Property

All personal property purchased with fraud proceeds, including clothing, shoes, handbags, luggage, home furnishings and decor, jewelry, wine, spirits, and other luxury goods, including but not limited to:

A. Domestic Personal Property

Watches

1. Rolex Oyster Perpetual Datejust, two-tone bracelet, silver dial;
2. Rolex Oyster Perpetual Datejust, two-tone bracelet, white dial;
3. Rolex Sky-Dweller Oyster Perpetual, rubber bracelet, gold casing and bezel, black dial;
4. Rolex Oyster Perpetual Superlative Chronometer Cosmograph Daytona, seafoam green dial;
5. Rolex Oyster Perpetual Day-Date, gold, dark green dial;
6. Rolex Oyster Perpetual Day-Date, gold and diamond bracelet, gold bezel, turquoise dial;
7. Rolex Oyster Perpetual Day-Date, gold bracelet, diamond bezel, caramel dial;
8. Rolex Oyster Perpetual Day-Date, gold, dark brown dial;
9. Audemats Piguet watch, black leather strap, black dial with exposed gears;
10. Louis Vuitton watch case containing a Louis Vuitton watch, black leather strap, gold case, pewter dial, numbered 1 of 100;

11. Louis Vuitton watch case containing a Louis Vuitton watch, brown leather strap, clear dial with brown glitter, Louis Vuitton spin time anniversary edition 1 of 50; and
12. Louis Vuitton watch case containing a Louis Vuitton desk clock/watch.

Necklace and Bracelets

1. Tiffany & Co. turquoise Pokémon box containing a silver Pikachu necklace;
2. Tiffany & Co. turquoise box containing gold bracelet with diamonds, inscribed: Au750Italyd 4.37ct; and
3. Audemars Piguet green box containing a gold and diamond bracelet.

Luggage, Purses, Cases, and Wallets

1. Louis Vuitton watch briefcase;
2. Hermes Birkin B25 Rose Sakura with palladium hardware;
3. Hermes Mini Kelly Black Epsom with gold hardware;
4. Hermes Mini Kelly Rose Pouppe Ostrich with palladium hardware;
5. Hermes B20 Mini Birkin Vert D'eau Matte Alligator with gold hardware;
6. Hermes Birkin B25 Black Matte Noir Alligator with gold hardware;
7. Hermes Black Kelly 25 Depeches Pouch Men's;
8. Hermes Birkin B25 Green Emerald Shiny Crocodile with gold hardware;
9. Hermes Birkin B30 Himalaya Crocodile;

10. Hermes B20 Mini Birkin Farbourg Bag Crocodile; and
11. Louis Vuitton white crocodile leather wallet with tag (Certificate No. FR2509502432-R, Model: N98109);
12. Louis Vuitton black leather wallet and tag (Model: N94450);
13. Louis Vuitton white python skin wallet (Certificate No. FR2509508386-R. Model: N89148);
14. Louis Vuitton orange alligator wallet (Certificate No. FR2209513716-R, Model: N81511);
15. Louis Vuitton gray bi-fold wallet;
16. Louis Vuitton dark green bi-fold wallet;
17. Louis Vuitton light gray bi-fold wallet;
18. Louis Vuitton white large wallet (Certificate No. PF.BRAZZA NM EX.PY.MNG.W, Model: N89150);
19. Louis Vuitton black wallet;
20. Louis Vuitton large white wallet with lock;
21. Louis Vuitton small brown round purse or watch case with belt;
22. Louis Vuitton black and white roller luggage suitcase (broken zipper);
23. Louis Vuitton teal and gray roller luggage suitcase;
24. Louis Vuitton checkered roller luggage suitcase;
25. Louis Vuitton teal leather tote bag containing wallet;
26. Louis Vuitton black and white bag (Speedy 40) with attached wallet;
27. Louis Vuitton black leather tote bag (Certificate No. FR2509507111, Model: N87491);

28. Louis Vuitton black leather tote bag (Certificate No. FR2509504169, Model: N87491);
29. Louis Vuitton black small purse;
30. Louis Vuitton white crocodile handbag (Certificate No. FR2407503111, KEEP.25BA.EX.NI.M.SN, Model: N82083);
31. Louis Vuitton teal (Speedy 50) handbag (Model: M11565);
32. Louis Vuitton dark teal alligator handbag (Certificate FR2409516270, Model: N87350);
33. Christian Louboutin white handbag with red interior;
34. Louis Vuitton pink (Speedy 40) handbag containing matching wallet (Model: M11563);
35. Christian Louboutin black handbag with red interior (Sneakender 1235134 B674 W53);
36. Louis Vuitton brown glitter handbag;
37. Louis Vuitton blue jean handbag;
38. Louis Vuitton checkered handbag containing matching toiletry bag;
39. Louis Vuitton gray and teal containing matching toiletry bag (interior stains);
40. Christian Louboutin black backpack with gold spikes;
41. Louis Vuitton brown leather handbag containing matching wallet;
42. Louis Vuitton black with jewels (Speedy 30) handbag containing matching wallet;
43. Louis Vuitton white alligator skin leather handbag;

44. Louis Vuitton dark teal alligator handbag (Certificate No. FR2409516990, Model: N87365);
45. Louis Vuitton dark blue python skin handbag (CAPUCI.MINI.EX.PY.SAPH, Certificate No. FR2509500596, Model: N87388);
46. Louis Vuitton forest green alligator leather handbag (Certificate No. FR2509503827, Model: N92891);
47. Louis Vuitton true blue alligator leather handbag;
48. Louis Vuitton black (Speedy 30) handbag "Shibuya Paris" containing matching wallet;
49. Louis Vuitton white and black duffle bag;
50. Louis Vuitton black crocodile handbag (CAPUCI.MINI EX.NI.B.SRB, Certificate No. FR2307512035, Model: N86112);
51. Louis Vuitton white crocodile leather handbag (Certificate No. FR2509503243);
52. Louis Vuitton pale blue alligator leather handbag (Certificate No. FR2509515284, Model: N89133);
53. Louis Vuitton Mykonos brown PVC bag containing matching PVC wallet;
54. Christian Louboutin black single strap backpack;
55. Christian Louboutin black single strap backpack containing black pouch;
56. Louis Vuitton orange box containing a pink alligator skin bag (Speedy 30), strap, and matching wallet (Certificate No. FR2509512202-R); and
57. Assorted Louis Vuitton and other luxury luggage and purses in the possession of Christopher Delgado or purchased by him for others.

Other Property

1. Louis Vuitton Billiard Monogram GM pool table;
2. Jewelry safe with watch winders;
3. Tiffany Taxi Clock;
4. Tiffany silverware;
5. Tiffany china;
6. Crystal and glassware;
7. Louis Vuitton Coffee Trunk in Pharrell Williams' Monogram Heritage canvas with gold-colored Alessi coffeemaker, eight Splendor cups and saucers, and eight Rivet spoons;
8. Louis Vuitton Montgolfière Aéro clock;
9. 2024 Epic E60L Golf Cart, Serial No. 7R4CL4BA3RC700493;
10. Wine and spirit collection; and
11. Sports and Celebrity Memorabilia.

B. Foreign Personal Property

Watches

1. Audemars Piguet Royal Oak Selfwinding Chronograph watch with smoked blue "Grande Tapisserie" dial and diamond bezel;
2. Audemars Piguet Royal Oak Frosted Gold Double Balance Wheel Openworked watch;
3. Audemars Piguet Royal Oak Selfwinding Chronograph pink gold watch fully set with brilliant-cut diamonds;
4. Audemars Piguet Royal Oak Concept Split-Seconds Chronograph GMT Large Date carbon and gold watch;

5. Audemars Piguet Royal Oak “Jumbo” Extra-Thin gold watch with a smoked yellow-gold-toned “Petite Tapisserie” dial;
6. Rolex Daytona watch with rainbow bezel;
7. Rolex Yacht-Master Oysterflex “Cotton Candy” Baguette Diamond white gold watch;
8. Rolex Oyster Perpetual Day-Date watch in gold with a chocolate, diamond-set dial, diamond-set bezel, and diamond-set President bracelet;
9. Rolex Oyster Perpetual Day-Date platinum watch with Arabic dial, trapeze diamond-set bezel, and a President bracelet;
10. Rolex Oyster Perpetual Day-Date 40mm white gold watch with Mother of Pearl dial, diamond-set bezel, and a President bracelet;
11. Rolex Yacht-Master 40 mm Everose gold watch with diamond-paved dial and Oysterflex bracelet;
12. Rolex Oyster Perpetual Day-Date 40 mm watch in 18kt yellow gold, with a diamond-paved dial, diamond-set bezel, and a President bracelet;
13. Rolex Oyster Perpetual Day-Date 36 mm watch in platinum, with an ice-blue, diamond-set dial, diamond-set bezel, and a President bracelet;
14. Rolex Oyster Perpetual Day-Date 36 mm platinum watch with silver dial, trapeze diamond-set bezel, and a President bracelet;
15. Rolex Oyster Perpetual Day-Date 40 mm watch in 18 kt yellow gold, fluted bezel, with champagne-color dial, fluted bezel, and a President bracelet;
16. Jacob & Co. Astronomia Solar Bitcoin 44 mm Watch in titanium blacked out with DLC, black alligator leather band;

17. Jacob & Co. Casino Roulette Tourbillon Watch with black alligator leather band;
18. Jean Schlumberger by Tiffany & Co. Bird on a Rock Diamond watch with black leather band;

Necklaces

1. Tiffany & Co. Titan by Pharrell Williams Necklace in Titanium, Gold, and Diamonds;
2. Tiffany & Co. HardWear Graduated Link Necklace in White Gold with Pavé Diamonds;
3. Tiffany & Co. Jean Schlumberger Gold and Diamond Necklace;
4. Tiffany & Co. Titan by Pharrell Williams Necklace in 18k Yellow Gold with Diamonds; and
5. Tiffany & Co. Tiffany 1837 Makers I.D. Tag Pendant in yellow gold with Goliath logo on a yellow gold beaded chain.

Cufflinks

1. Three pairs of Goliath Logo Cufflinks;
2. One pair of Rolls Royce Cufflinks;
3. One pair of Christian Dior Logo Cufflinks;
4. One pair of Louis Vuitton Cufflinks; and
5. One pair of round Cartier Santos-style Cufflinks.

Bracelets

1. Tiffany & Co. Titan by Pharrell Williams Bracelet in Titanium, Gold, and Diamonds;
2. Tiffany & Co. Titan by Pharrell Williams Bracelet in 18k Yellow Gold with Diamonds;

3. Tiffany & Co. Jean Schlumberger Gold and Diamond Bracelet;
4. Tiffany & Co. Tiffany T1 bangle in white gold with baguette and pavé diamonds;
5. Tiffany & Co. Tiffany T1 wide diamond hinged bangle in white gold with emeralds;
6. Tiffany & Co. Tiffany T1 wide diamond hinged bangle in white gold;
7. Tiffany & Co. Tiffany Lock bangle in white gold with full pavé diamonds;
8. Tiffany & Co. Tiffany T pavé diamond square bracelet in yellow gold;
9. Bvlgari Serpenti Viper Bracelet in 18k white gold set with full pavé diamonds;
10. Bvlgari Serpenti Viper Bracelet in 18k rose gold set with full pavé diamonds;
11. Van Cleef & Arpels Vintage Alhambra Bracelet, 5 Motifs in 18K yellow gold, diamond, and malachite; and
12. Van Cleef & Arpels Vintage Alhambra Bracelet, 5 Motifs in 18K gold, diamond, mother-of-pearl (dark).

Earrings

1. One pair of Louis Vuitton Princess Cut Diamond Stud Star cut Earrings; and
2. One pair of Louis Vuitton Volt One Stud White Gold and Diamond Earrings.

Other Jewelry

1. Tiffany & Co. Jean Schlumberger Gold and Gem Set Fish Brooch; and

2. Men's Diamond Encrusted Goliath Logo Ring.

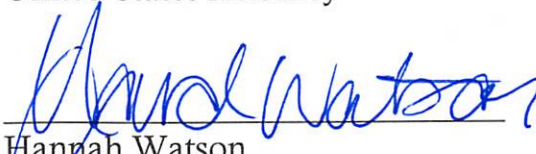
5. If any of the property described above, as a result of any act or omission of the defendant:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,


the United States shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c). The substitute assets to be forfeited in satisfaction of the order of forfeiture include, but are not limited to, any equity in the following real properties not traceable to proceeds:

1. The real property located at 746 Cavan Drive, Apopka, Florida 32703; and
2. The real property located at 2142 Country Side Drive, Apopka, Florida 32712.

GREGORY W. KEHOE
United States Attorney

By: 
Hannah Watson
Assistant United States Attorney

By: 
Richard Varadan
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