

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
www.flsb.uscourts.gov

In re:

GOLIATH VENTURES INC. (FL),

Chapter 11
Case No. 26-13174-RAM

GOLIATH VENTURES INC. (WY),

Case No. 26-13176-RAM
Jointly Administered

Debtors.

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**DISCLOSURE STATEMENT PURSUANT TO FED. R. BANKR. P. 2019
FOR GROUP REPRESENTATION OF INDIVIDUAL CREDITORS**

Daniel M. Coyle, Esq. of Sequor Law, P.A., pursuant to Fed. R. Bankr. P. 2019, files this verified Disclosure Statement in connection with the above-captioned jointly administered Chapter 11 case (the “Chapter 11 Case”) and states as follows:

I. Preliminary Statement

1. The Group is comprised of the individuals (“Group Members”) listed in the chart attached hereto as **Exhibit A**.

2. This Rule 2019 Disclosure Statement is intended to provide the disclosures required for representation of multiple creditors by a counsel in a Chapter 11 case, including disclosures regarding the nature and amount of claims, the identity of the represented parties, and the circumstances of the Group's formation and authority.

3. The Group Members are individual creditors who assert they are victims of an alleged Ponzi scheme conducted by, through, or in connection with Debtor, and who hold claims against Debtor arising from such alleged conduct.

II. Description of the Group and the Nature of Representation

4. The Group is an *ad hoc* group of individual creditors (the "Group Members") who have retained the undersigned to represent them in connection with the Chapter 11 Case.

5. The Group Members are individuals who assert claims against Debtor arising from investments, transfers, deposits, or other transactions by them with Debtor in which they were defrauded as victims of a Ponzi scheme.

6. The purpose of the Group is to coordinate participation in the Chapter 11 Case, including, as applicable:

1. Monitoring case developments.
2. Reviewing pleadings and proposed relief affecting creditor recoveries.
3. Appearing and being heard on matters affecting the Group Members' interests.
4. Communicating with Debtor's Counsel, the Office of the United States Trustee, Counsel for the Official Creditor's Committee, and other parties in interest.
5. Evaluating and, where appropriate, supporting or opposing proposed plans, settlements, asset sales, claims reconciliation procedures, and avoidance actions.
7. The Group is not an official committee appointed under 11 U.S.C. § 1102, and nothing herein is intended to suggest otherwise.

III. Disclosures Regarding Claims and Economic Interests

8. Each Group Member asserts a claim against Debtor arising from alleged Ponzi scheme-related conduct.

9. The claims are for fraud, breach of contract, unjust enrichment, rescission, securities-related claims, restitution, constructive trust, and/or conversion.

10. Pursuant to Bankruptcy Rule 2019, the attached Exhibit A lists each Group Member's address and the nature and amount of each disclosable economic interest if any, held by each Interested Party.

11. No Group Member has transferred any claim against Debtor.

IV. Reservation of Rights

12. Nothing contained in this Rule 2019 Statement is intended to, or should be construed:

1. to waive any Interested Party's right to have any final order entered by, or other exercise of the judicial power of the United States performed by, an Article III court;
2. to waive any Interested Party's right to have final orders in non-core matters entered only after de novo review by a United States District Judge;
3. as consent to the jurisdiction of the Court over any matter;
4. as an election of remedy by any Interested Party;
5. as a waiver of any Interested Party's right to trial by jury in any proceeding so triable;
6. as a waiver of any Interested Party's right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal;
7. as a waiver of any privilege or protection against disclosure including without limitation the attorney client privilege or the attorney work product doctrine; or
8. as a waiver of any other rights, claims, actions, defenses, setoffs, or recoupments to which the Interested Parties or the Firm are or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved. Additionally, nothing herein should be construed as a limitation upon, or waiver of, any rights of any Interested Party to assert, file, and/or amend any proof of claim in accordance with applicable law and any order entered in these chapter 11 cases.

13. The Group Members reserve all rights, claims, defenses, and arguments in the Chapter 11 Case, including with respect to:

1. The allowance, priority, classification, and treatment of claims;
2. Any asserted rights to specific property, tracing, constructive trust, or other equitable remedies (to the extent applicable), and;
3. Any plan, disclosure statement, settlement, sale, or other transaction proposed in the Chapter 11 Case.

14. The Filing Party and Group Members each reserves the right to amend or supplement this Rule 2019 Disclosure Statement as required by Fed. R. Bankr. P. 2019, applicable local rules, or further order of the Court.

15. The information contained herein is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other purpose or use.

WHEREFORE, The Filing Party and Group Members respectfully request that this Court accept this Rule 2019 Disclosure Statement as satisfying the disclosure requirements of Fed. R. Bankr. P. 2019 to the extent applicable, subject to supplementation and amendment.

Verification

I, Daniel M. Coyle, declare under penalty of perjury that I have reviewed this Rule 2019 Disclosure Statement and the information contained herein and in the attached exhibit(s), is true and correct.

/s/ Daniel M. Coyle
Daniel M. Coyle

Dated: June 5, 2026

SEQUOR LAW
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By: /s/ Daniel M. Coyle
Daniel M. Coyle
Florida Bar No.: 55576
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed via electronic filing using the CM/ECF system with the Clerk of the Court which sent e-mail notification of such filing to all CM/ECF participants in this case and via regular US mail to all participants who are not on the list to receive e-mail notice/service for this case as indicated on the service list on June 23, 2026.

/s/ Daniel M. Coyle

Daniel M. Coyle

SERVICE LIST

Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- **Alexander E. Brody** abrody@melandbudwick.com, ltannenbaum@melandbudwick.com;mrbnfs@yahoo.com;ltannenbaum@ecf.courtdrive.com;phornia@ecf.courtdrive.com
- **Elizabeth R. Brusa** ebrusa@shumaker.com, mkulczycke@shumaker.com
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- **Office of the US Trustee** USTPRegion21.MM.ECF@usdoj.gov
- **Steven D Schneiderman** Steven.D.Schneiderman@usdoj.gov
- **Christian Somodevilla** Christian.Somodevilla@usdoj.gov, shannon.patterson@usdoj.gov;bridgett.moore@usdoj.gov
- **Jeffrey R Sonn** jsonn@sonnlaw.com

Manual Notice List

BMW Financial Services NA LLC
c/o AIS Portfolio Services, LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118

James L. Hager, JR
2306 Fancy Free Drive
Sebring, FL 33872

Steven A Wolf
GlassRatner Advisory & Capital
Group, LL
1675 N. Military Trail, Suite 650
Boca Raton, FL 33486

EXHIBIT A

<u>Name</u>	<u>Address</u>	<u>Nature of Claim</u>	<u>Amount of Claim</u>	<u>Claim No.</u>
James Deppoleto	1600 Paramount Dr., Waukesha, WI	Ponzi Scheme Victim	\$1,342,060.79	406
Home First 369, LLC	1600 Paramount Dr., Waukesha, WI	Ponzi Scheme Victim	\$1,500,000.00	405
Dave Anderson	W283 N4865 Roosevelts Quay, Pewaukee, WI	Ponzi Scheme Victim	\$100,000.00	414
Rodney Dent	700 E Kilbourn Ave Apt 1014, Milwaukee, WI	Ponzi Scheme Victim	\$980,000.00	415
TJ Dillashaw/ Brighter Journey Development, LLC	7945 Morningside Drive, Granite Bay, CA	Ponzi Scheme Victim	\$600,000.00	413
Hal Dillashaw	PO Box 294, Altaville, CA	Ponzi Scheme Victim	\$280,848.00	pending