

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

In re:

Chapter 11

GOLIATH VENTURES INC. (FL),
GOLIATH VENTURES INC. (WY),

Case No. 26-13174-RAM
Case No. 26-13176-RAM
Jointly Administered

Debtors.

/

AGREED MOTION FOR TURNOVER OF ESTATE PROPERTY

Goliath Ventures Inc., a Wyoming corporation (“*Goliath WY*”), and Goliath Ventures Inc., a Florida corporation f/d/b/a Gen-Z Venture Firm, Inc. (“*Goliath FL*,” and together with Goliath WY, “*Debtors*”), by and through undersigned counsel, file this agreed motion pursuant to 11 U.S.C. §§ 105, 541, & 542 and F.R.B.P. 9014 (“*Motion*”) for entry of an order directing turnover of estate property. In support, the Debtors state as follows:

1. On March 3, 2026 and March 5, 2026, Michael S. Budwick was appointed as receiver (“*Receiver*”) for the Debtors. *See* Dkt. No. 20, Composite Exhibit 1.
2. The Receiver immediately began his investigation and identified that Wealth MD, LLC (“*Wealth MD*”) had a relationship with the Debtors.
3. On March 9, 2026, the Receiver sent a demand letter to Wealth MD for, among other things, turnover of property.
4. On March 16, 2026 (“*Petition Date*”), the Debtors initiated these bankruptcy cases by filing voluntary petitions for relief under Chapter 11 of the Bankruptcy Code.
5. The estates are being jointly administered. *See* Dkt. No. 7.
6. Post-petition, Wealth MD communicated with the Debtors, and among other things advised the Debtors that it is holding \$141,412 (“*Funds*”) that should be properly turned

over to the Debtors. The Funds are held in a commercial checking account at TD Bank, the named account holder is Wealth MD, and the last four digits of the account are 9363.

7. Section 541 of the Bankruptcy Code broadly defines property of the estate, and Section 542 of the Bankruptcy Code instructs that an entity holding property of the estate “shall” deliver that property to the debtor.

8. Neither the Debtors nor Wealth MD shall be prejudiced or affected in any way by this Motion, other than the mere fact that the Funds will be turned over to the Debtors. For the avoidance of doubt, neither the Debtors nor Wealth MD shall be deemed to have released, waived, forfeited, abandoned, or relinquished any rights, or deemed to have taken any factual position, by virtue of the turnover of these Funds to the Debtors. This Motion does not seek to adjudicate any rights or facts, other than the mere fact that the Funds shall be turned over to the Debtors. All rights and positions of any party are expressly reserved.

9. Wealth MD **agrees** to the relief requested in this Motion.

10. A proposed order granting the requested relief in this Motion is attached as Exhibit A.

WHEREFORE, the Debtors respectfully request entry of an order substantially in the form attached as Exhibit A that grants this Motion and (i) directs Wealth MD to immediately turn over the Funds to the Debtors; and (ii) grants such other and further relief as the Court deems just and proper.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on April 14, 2026, via the Court's Notice of Electronic Filing upon the Registered Users listed on the attached Exhibit 1 and on the Court's Master Service List pursuant to Local Rule 2002-1(H)(1) attached as Exhibit 2.

Dated: April 14, 2026

/s/ Alexander E. Brody
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*Attorneys for the Receiver and
Proposed Attorneys for Debtors*

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Chapter 11

GOLIATH VENTURES INC. (FL),
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Case No. 26-13174-RAM
Case No. 26-13176-RAM
Jointly Administered

Debtors.

ORDER GRANTING AGREED MOTION FOR TURNOVER OF ESTATE PROPERTY

THIS MATTER came before the Court upon the *Agreed Motion for Turnover of Estate Property* [Dkt. No. ____] (the “*Motion*”). The Court, having reviewed the Motion, and finding good cause therefor,

ORDERS as follows:

1. The Motion is **GRANTED**.

2. Wealth MD, LLC shall immediately turn over the Funds to the Debtors.¹

3. Neither the Debtors nor Wealth MD shall be affected in any way by this Order, other than the mere fact that the Funds will be turned over to the Debtors. Neither the Debtors nor Wealth MD shall be deemed to have released, waived, forfeited, abandoned, or relinquished any rights, or be deemed to have taken any factual position, by virtue of the turnover of the Funds to the Debtors. The only item adjudicated by this Order is that the Funds shall be turned over to the Debtors. The Debtors and Wealth MD have reserved all other rights and positions.

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Submitted By:

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Proposed Counsel for Debtors
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Telephone: (305) 358-6363
Telecopy: (305) 358-1221

Copies Furnished To:

Alexander E. Brody, Esquire, is directed to serve copies of this Order on all parties in interest and to file a Certificate of Service.

¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion.

Mailing Information for Case 26-13174-RAM

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
- **Jonathan S. Feldman** feldman@katiephang.com, service@katiephang.com
- **Solomon B Genet** sgenet@melandbudwick.com,
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- **Office of the US Trustee** USTPRegion21.MM.ECF@usdoj.gov
- **Steven D Schneiderman** Steven.D.Schneiderman@usdoj.gov

MASTER SERVICE LIST PER LOCAL RULE 2002-1(H)

U.S. Trustee: *(Notice provided via NEF)*

Office of The United States Trustee
51 SW First Avenue, Room 1204
Miami, FL 33130

Hannah Watson, AUSA
35 SE 1st Avenue, Suite 300
Ocala, Florida 34471
Via email: hannah.watson@usdoj.gov

Debtors-in-Possession: *(via NEF)*

Goliath Ventures Inc.
c/o Michael S. Budwick, Receiver
200 South Biscayne Blvd., #3200
Miami, Florida 33131

Jordan A. Cortez
Sean O'Neill
Alan Maza
Securities & Exchange Commission
Division of Enforcement
Miami Regional Office
801 Brickell Avenue, Suite 1950
Miami, Florida 33131
Via email: cortezjo@sec.gov
Via email: oneills@sec.gov
Via email: mazaa@sec.gov

Debtor-in-Possession's Attorney:
(Notice provided via NEF)

Solomon B. Genet, Esquire
Alexander E. Brody, Esquire
Meland Budwick, P.A.
3200 Southeast Financial Center
200 South Biscayne Boulevard
Miami, Florida 33131

Joint Committee of Creditors:

John D. Euliano Revocable Trust
c/o Jordan A. Shaw, Esq.
110 SE 6th Street, Suite 2900
Ft. Lauderdale, FL 33301
Via email: jshaw@shawlewenz.com

Secured Creditors:

Attn: BMW Financial Services
NA, LLC Department
AIS Portfolio Services, LLC
Account: XXXXXX0990
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118

ECLYFE LLC
c/o Jordan A. Shaw, Esq.
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Ft. Lauderdale, FL 33301
Via email: jshaw@shawlewenz.com

Attn: BMW Financial Services
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AIS Portfolio Services, LLC
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Oklahoma City, OK 73118

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Via email: jerrystanley10@gmail.com

United States and its agencies:

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Philadelphia, PA 19101-7346

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MASTER SERVICE LIST PER LOCAL RULE 2002-1(H)

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Notice of Appearances:

*(Notice provided via NEF
Upon Registered Users)*

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