

**IN THE CIRCUIT COURT IN AND FOR ESCAMBIA COUNTY,
FLORIDA**

DEEPGULF, INC. and
TOKE OIL AND GAS, S.A.

Plaintiffs,

vs.

MARC M. MOSZKOWSKI

Defendant.

Case No.: 2018 CA 000543

Division: "E"

Marc Moszkowski
Le Verdos
83300 Châteaudouble, France
m.moszkowski@deepgulf.net
April 21 , 2025

Braden K. Ball, Jr.
Counsel for Plaintiffs
Florida Bar No. 89000
Litvak Beasley Wilson & Ball, LLP
40 Palafox Place, Suite 300
Pensacola, Florida 32502

Via Florida Courts E-Filing Portal and Email

**RE: FORMAL DEMAND FOR INSPECTION AND ELECTRONIC
DELIVERY OF CORPORATE RECORDS**

Pursuant to Florida Statutes § 607.1602 and § 607.1604

Dear Mr. Ball,

Pursuant to **Florida Statutes § 607.1602**, I hereby make formal demand for **inspection and delivery of electronic copies** of all accounting and financial records of DeepGulf, Inc. from **July 1, 2019 through the present date**, including but not limited to:

- General ledgers and balance sheets,
- Income statements,
- Bank statements and reconciliation reports,
- Accounts payable and receivable ledgers,
- Expense reports and tax filings,
- Records of shareholder distributions and equity transactions,
- Any other financial documents required to be maintained under Florida law.

As a **Director** and nearly **49.9% shareholder** of DeepGulf, Inc., I am entitled to this access under § 607.1602(1). That statute further permits a corporation to satisfy this obligation **via electronic delivery**, which I expressly request pursuant to **§ 607.1602(5)**.

Despite repeated requests over several years, I have not received any updated accounts since July 2019, when they were released under threat of subpoena. Since then, either my requests have been ignored or I have been told, sarcastically and in bad faith, that I am "free to come to the office" to review them. Given that I am indigent, reside 5,000 miles away and have documented medical constraints which prevent travel, such a position is not only impractical but knowingly obstructive.

Florida law **does not require in-person review**, especially where it is not feasible. The refusal to provide records electronically, when doing so imposes no hardship on the corporation and fulfills a lawful obligation, reflects ongoing bad faith and potential concealment.

I therefore demand that all responsive documents be delivered to me in PDF or equivalent electronic format **within ten (10) business days** of this notice. Failure to comply will compel me to seek judicial relief under **§ 607.1604**, including the imposition of costs and sanctions.

Please confirm your receipt of this demand and identify the date by which full delivery of records will be made.

Respectfully,

Marc M. Moszkowski

Defendant, pro se

April 21, 2025

A handwritten signature in blue ink that reads "M. Moszkowski". The signature is written in a cursive, flowing style.