

Electronically Filed
8/5/2024 5:05 PM
Steven D. Grierson
CLERK OF THE COURT



DECL
ROBERT A. RABBAT (Nevada Bar #12633)
TERI T. PHAM (CA Bar #193383 – *Pro Hac Vice Pending*)
ENENSTEIN PHAM GLASS & RABBAT LLP
11920 Southern Highlands Parkway, Suite 103
Las Vegas, Nevada 89141
Telephone: (702) 468-0808
Facsimile: (702) 920-8228
rrabbat@epgrlawyers.com; tpham@epgrlawyers.com

*Attorneys for Specially Appearing Defendants,
Global Tech Industries Group, Inc.,
David Reichman, Kathy M. Griffin, Frank Benintendo,
Donald Gilbert, and Global Tech Industries Group, Inc.*

DISTRICT COURT
CLARK COUNTY, NEVADA

WHITE ROCKS (BVI) HOLDINGS INC., et al.)	Case No. A-24-896359-B
)	Dept. No. 16
Plaintiffs,)	
)	DECLARATION OF AFSHIN LUKE
vs.)	RAHBARI IN OPPOSITION TO
)	PLAINTIFFS' EX PARTE MOTION TO
DAVID REICHMAN, KATHY M. GRIFFIN,)	APPOINT RECEIVER AND ISSUE A
FRANK BENINTENDO, DONALD)	TEMPORARY RESTRAINING ORDER
GILBERT, DOES I THROUGH X,)	ON AN ORDER SHORTENING TIME
INCLUSIVE, and ROE CORPORATIONS I)	
THROUGH X, inclusive,)	
)	
Defendants,)	
)	
)	
)	

DECLARATION OF AFSHIN LUKE RAHBARI

I, Afshin Luke Rahbari, declare as follows:

1. I am the Chief Executive Officer of Global Tech Industries Group, Inc. ("GTII"). I have personal knowledge of the facts stated herein, and if called as a witness, I could and would competently testify thereto.

2. I was initially hired as a management consultant to GTII, effective December 1, 2023. I was engaged to assist the GTII's Board of Directors in refocusing its short and long-term corporate goals, including a retirement and succession plan for its senior management.

3. On April 7, 2024, GTII created the new executive position of Chief Operating Officer. I was appointed to serve in that position by GTII's Board of Directors, effective May 1, 2024.

4. On August 1, 2024, GTII's Board of Directors appointed me to serve as GTII's Chief Executive Officer.

5. From 1993 to 2001, I was registered with a major US based regulated exchange (Chicago Board Option Exchange) as a runner, clerk, market maker, and specialist.

6. From 2001 to the present, I have held various securities licenses both in the US and UK.

7. I maintain a spotless regulatory record. I have never been charged with any violations by any regulatory agency.

8. I have not been involved in helping any "shorts" drive the price of GTII stock down. I have no interest in seeing GTII go bankrupt as alleged by Richard Hofman in his public postings. In fact, I am suing Mr. Hofman for defamation and libel in California relating to these claims.

9. I have reviewed the Complaint filed by Plaintiffs White Rocks (BVI) Holdings et. al. against David Reichman, Kathy M. Griffin, Frank Benintendo, Donald Gilbert, and GTII (Case No.: A-24-896359-B). I did not participate in any of the purported transactions alleged in the Complaint, most of which took place prior to my hiring by GTII.

10. I have been apprised of the unfortunate issues relating to GTII's former auditor, BF Borgers CPA PC and its sole audit partner, Benjamin F. Borgers CPA (collectively, "BF Borgers"). As indicated in the Declaration of Sasha Ablovatskiy, GTII has retained the law firm of Shecter Foley Ablovatskiy, which are experts in SEC matters, to assist with bringing GTII in compliance with all SEC regulations in

light of the issues caused by BF Borgers.

11. As also stated in Mr. Ablovatskiy's declaration, within days of the SEC's ban of BF Borgers, GTII retained a new certified auditing firm, Fortune CPA ("Fortune"). Fortune is in the process of re-auditing GTII's financial statements and has advised that it expects to complete its re-audits by the third quarter. Attached hereto as **Exhibit "A"** is true and correct copy of a letter from Fortune advising the same.

12. For these reasons, I do not believe that the appointment of a Receiver for GTII is warranted or appropriate. In fact, a turnover of management at this juncture would likely cause further delay in the audit process and detriment to the Company. However, in the event that the Court finds the appointment of a Receiver necessary, I am ready, willing, and able to serve as Receiver for GTII.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct. Executed on this 5th of August, 2024, at Afshin Luke Rahbari, Connecticut.

Signed by:

F873785B0BF741A...
 Afshin Luke Rahbari

EXHIBIT “A”

EXHIBIT “A”



333 City Blvd W 3rd Floor Orange, CA 92868
Phone (714)-820-3316 Fax (714)-333-4992

To Whom it may concern,

We were engaged by Global Tech Industries Group, Inc. (GTII) on May 7, 2024, as the new auditor for the Company to perform the Q1 2024 review due to the SEC investigation and removal of the prior auditor, BF Borgers CPA. We are in the process of performing the reaudits for the years 2022 and 2023 handled by BF Borgers CPA and will also review the December 31, 2021 audit from Pinnacle Accountancy Group as part of our audit procedures. We estimate that the audits will be completed at the end of Q3 2024, contingent on all required audit procedures being completed with the assistance of the Company. We expect the Company, and its management are fully cooperating with our reaudits.

Sincerely,

Fortune CPA Inc

CERTIFICATE OF SERVICE

Pursuant to Nev.R.Civ.P. 5(b), I hereby certify that on August 5, 2024, I served a true and correct copy of the foregoing:

DECLARATION OF AFSHIN LUKE RAHBARI IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFFS' EX PARTE MOTION TO APPOINT RECEIVER AND ISSUE A TEMPORARY RESTRAINING ORDER ON AN ORDER SHORTENING TIME

electronically via the court's e-filing system Odyssey eFileNV, including the following interested parties named below:

Chad F. Clement, Esq.
Alexander K. Calaway, Esq.
Marquis Aurbach
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
clement@maclaw.com
acalaway@maclaw.com
Attorneys for Plaintiff

/s/Lauren A. Verbanik

Lauren Verbanik, *Paralegal*

DECLARATION OF AFSHIN LUKE RAHBARI IN OPPOSITION TO PLAINTIFFS' EX PARTE MOTION TO APPOINT RECEIVER AND ISSUE A TEMPORARY RESTRAINING ORDER ON AN ORDER SHORTENING TIME