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Donald Gilbert, and Global Tech Industries Group, Inc.*

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

WHITE ROCKS (BVI) HOLDINGS INC., et al.)	Case No. A-24-896359-B
)	Dept. No. 16
Plaintiffs,)	
)	
vs.)	SUPPLEMENTAL DECLARATION OF
)	AFSHIN LUKE RAHBARI IN SUPPORT
DAVID REICHMAN, KATHY M. GRIFFIN,)	OF MOTION FOR
FRANK BENINTENDO, DONALD)	RECONSIDERATION OF ORDER
GILBERT, DOES I THROUGH X,)	APPOINTING RECEIVER AND
INCLUSIVE, and ROE CORPORATIONS I)	TEMPORARY RESTRAINING ORDER
THROUGH X, inclusive,)	
)	
Defendants,)	
)	
)	
)	

SUPPLEMENTAL DECLARATION OF AFSHIN LUKE RAHBARI

I, Afshin Luke Rahbari, declare as follows:

1. I am the new and current CEO of Global Tech Industries Group, Inc. (“GTII”).

2. I had no involvement in the actions complained of by the Plaintiffs, in this action.

3. Since assuming my role, I have been actively working to restructure and reorganize GTII, addressing issues caused in part by certain parties who failed to deliver on deals that never materialized, reneged on promised financial contributions, and withheld intellectual property, as well as sales and marketing support.

4. I was appointed to this role after serving as a consultant starting in December 2023, then as Chief Operating Officer in April 2024, and finally as CEO in August 2024.

5. GTII initially approached me because the board and management recognized the need for assistance, not only with due diligence for potential deals and partnerships but also with the successful execution and ongoing operations of any agreements entered into.

6. Since joining GTII, I have undertaken several significant initiatives to improve the company’s operations and financial health:

i. I assisted in securing a new auditor for GTII and requested that the audits for 2022 and 2023 be conducted by our new auditor, Fortune.

ii. I also tasked Fortune with completing the 2024 audit. I initiated a comprehensive review of existing contracts and deals, deciding either to move forward with viable agreements or terminate several that were not beneficial to the company.

iii. I began actively pursuing outstanding debts owed to GTII by various entities and working on collecting those debts.

iv. I agreed with management that over 36 million shares should be returned to the company, as two critical deals had not been completed.

v. I concurred with the board and management that 20 million shares held by corporate counsel for AI Commerce Group LLC (“AI Commerce”) should be returned to the treasury, as AI Commerce had failed to meet its obligations to GTII. For further details, please refer to President Kathy Griffin’s declaration. AI Commerce is a party to the

lawsuit and signed an affidavit under penalty of perjury, claiming ownership and possession of these shares, which they clearly did not have, as the GTII Board canceled the shares.

vi. The cancellation of these shares directly challenges the plaintiffs' and their legal team's claim of 10% ownership. It is clear that the plaintiffs and their attorneys knew, under Nevada law, that they did not possess the shares and had, in effect, attempted to fraudulently seize control of the company through these false claims. It is also incredibly disingenuous that certain parties, who failed to fulfill their contractual obligations to GTII, have joined the lawsuit and now claim that GTII "does not want to conduct business" when, in fact, they are the ones in breach of their contracts.

vii. I have dedicated considerable time and effort to implementing positive changes at GTII. Contrary to the false statement made in court, I was not with the company during the period when shares were issued to management.

viii. To my knowledge, Plaintiffs' proposed receiver, Paul Strickland, has never successfully turned a firm around, and Mr. Hofman has no experience managing a company. If the Court does not see me as a viable option to act as a receiver for GTII and its shareholders, I respectfully request that a neutral, impartial receiver be appointed, rather than placing the company in the hands of disgraced lawyers and con-men.

7. The lead plaintiff in this case, Richard Hofman, is a YouTuber and attorney based in California.

8. He has previously filed lawsuits in several other cases, seemingly in an attempt to position himself as a notable figure in legal and capital markets circles.

9. To my knowledge, his previous filings—such as in the META MATLS Pref Shs ("MMTLP") case, another stock with a significant retail following—have not yielded any results.

10. Mr. Hofman has used his social media platforms, including Twitter and YouTube, to make false and derogatory accusations against me, GTII, and my role within the company.

11. To my knowledge, no entity or individual has approached GTII with a "billion-dollar deal" that management has refused.

12. Furthermore, Mr. Hofman has repeatedly failed to provide any specifics—such as names, figures, or actual deals—to substantiate his claims on social media.

13. If Mr. Hofman had knowledge of such deals, it raises the question: why would these parties communicate with Mr. Hofman instead of GTII’s management?

14. When I first joined GTII, I participated in a due diligence meeting regarding a potential mining deal in Chile.

15. This meeting included GTII Chairman David Reichman, me, three representatives claiming to hold the mining rights, President Kathy Griffin via Zoom, another individual from Chile on Zoom, and a friend of Mr. Reichman.

16. This group claimed to hold mining rights known as “Trento” in Chile and touted the deal as a “multi-billion-dollar” opportunity for GTII. They requested 50 million shares of GTII stock and other considerations in exchange for these rights.

17. However, during the meeting, the Trento group was unable to present a coherent or consistent narrative. In fact, they changed their story about who owned the mining rights three times during the same discussion.

18. After several weeks of back-and-forth and their continued failure to produce any credible documentation, I decided to bring the negotiations to a close. From what we understand, this decision made the Trento group very upset with both me and GTII.

19. What is particularly concerning is that GTII management later discovered that the Trento group had created a website, “Trento Global Group,” using GTII’s corporate address in New York.

20. Even more alarming, our legal team in California, which is handling the defamation lawsuit against Mr. Hofman, received messages from individuals using a Trento email address offering to settle the lawsuit against Mr. Hofman.

21. It is important to note that the email address in question is rhofman@trentoglobalgroup.com.

22. Additionally, Mr. Michelangelo Russo, one of the participants in the meeting held in New York regarding Trento, was also involved in these communications.

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23. One of the claims made by the lead plaintiff is that GTII management has ignored “billion-dollar deals.” I question whether the Trento deal is one of these so-called “billion-dollar deals” that the plaintiff alleges we refused to act on.

24. Despite facing false claims and ongoing legal battles, my priority has always been to act in the best interests of GTII and its shareholders.

25. If the Court does not view me as the appropriate leader for GTII, I respectfully request the appointment of a neutral, impartial receiver to oversee the company, rather than allowing it to fall into the hands of those with questionable motives.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct. Executed on this 6th of September 2024, at West Port, Connecticut.

Signed by:

Afshin Luke Rahbari

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Luke Rahbari

CERTIFICATE OF SERVICE

Pursuant to Nev.R.Civ.P. 5(b), I hereby certify that on September 6, 2024, I served a true and correct copy of the foregoing:

**SUPPLEMENTAL DECLARATION OF AFSHIN LUKE RAHBARI IN SUPPORT OF
MOTION FOR RECONSIDERATION OF ORDER APPOINTING RECEIVER AND
TEMPORARY RESTRAINING ORDER**

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

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