

1 **DECLARATION OF JOSEPH S. LITNER, M.D.**

2 I, Joseph S. Litner, M.D., Ph.D., F.A.C.E.P, declare:

3 1. I am over the age of eighteen, have personal knowledge of the facts contained
4 herein and would and could testify competently thereto if called as a witness.

5 2. I am a board-certified emergency physician. A copy of my C.V. is attached as
6 **Exhibit A.**

7 3. In 1992, I had been invited to Harry Moll’s office in Vancouver, British
8 Columbia, to see a presentation on Neuro Navigation, a company owned by a “Dr.” Anthony
9 Nobles. Northfork Ventures Ltd. was going to be making a press release the next day announcing
10 the acquisition of a 60% interest in Neuro Navigation.

11 4. Present at Harry Moll’s office were Patty McCleary and Chet Guzowski.
12 Sometime during this meeting David Hunter walked in. I had previously done business with
13 David Hunter in conjunction with the earlier investment. David Hunter touted the Northfork
14 Ventures deal and stated that the next day there would be an announcement of the acquisition of
15 a 60% interest in Neuro Navigational by Northfork Ventures. David Hunter urged me to buy the
16 stock and to buy 25,000 free trading shares the next day. (The stock had been at \$2.90 per share
17 but the order which David Hunter ultimately placed for me the next day was at \$3.30 per share.)
18 David Hunter touted the stock to me—saying it was an excellent deal; it certainly left me with the
19 impression that David Hunter had done some due diligence.

20 5. Several months later, after I had purchased the stock, I was finally able to meet
21 “Dr.” Anthony Nobles because he came to New Orleans to give a presentation to potential
22 investors. I attended with other physicians what could only best be described as a “dog and pony
23 show,” which left me with serious concerns about my investment.

24 6. After the presentation, I and two other physicians, Chet Guzowski, and “Dr.”
25 Anthony Nobles, together with other investors, went to dinner at Andrea’s Restaurant in
26 Metairie, Louisiana.

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1 7. During the dinner, “Dr.” Anthony Nobles also made another pitch for investment
2 in his company by taking a cantaloupe and several knives and began to demonstrate on the
3 cantaloupe how his “invention” actually worked. It made no sense. And when I queried Nobles
4 about basic physiology, Nobles seemed to lack understanding of even the most basic human
5 anatomy and physiology.

6 8. Chet Guzowski and Anthony Nobles made an offer to me to be on the board of
7 Nobles’s corporation. Because I was leery of Nobles’s incompetent responses to my basic
8 anatomical and physiological questions, I told them I would think about it.

9 9. A few months later, I was invited to California to tour Nobles’s “lab” and
10 facilities and offices. Present at the tour was with Nobles’s father, Ken Wynans, and Chet
11 Guzowski.

12 10. I was completely shocked when I toured the facilities. It was obviously a very
13 small operation and the facilities was not what one would have expected of a lab. I was shown a
14 crude prototype of an implement. The “lab” appeared to be a one-man machine shop and more
15 closely resembled nothing more than a garage.

16 11. After the tour of the offices, facilities, and “lab,” I went out to lunch with Nobles,
17 Nobles’s father, and Ken Winans, and others. The lunch lasted for two to three hours.

18 12. During this lunch, I again questioned “Dr.” Anthony Nobles again about the
19 “invention.” Again, Nobles was unable to answer even the most basic questions regarding the
20 usage and efficacy of this device.

21 13. Nobles informed me he had earned a degree in physics from the University of
22 Texas, a Bachelor of Science in Electrical Engineering from UCLA, and a PhD. in Biomedical
23 Engineering from UCLA in cooperation with the University of Munich. He also claimed that a
24 cardiovascular surgeon in Arizona was a great friend who had successfully used his invention.

25 14. After this meeting, and based upon Nobles’s lack of clear answers regarding the
26 use of his invention, and clear lack of medical expertise, I decided to do a thorough background
27 investigation on Anthony Nobles and his claims of having a doctorate.

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1 15. I believe I telephoned the cardiovascular surgeon Anthony Nobles had mentioned.
2 This gentleman stated he hardly knew Anthony Nobles.

3 16. Next, I contacted the University of Texas and was informed that no degree was
4 conferred upon Anthony Nobles at any time by their institution.

5 17. I also contacted Munich University and was informed they had never heard of
6 Anthony Nobles and no such degree was conferred.

7 18. After thoroughly investigating Anthony Nobles and his "résumé" that he was
8 presenting to investors and others, I came to the conclusion that I had been defrauded by Anthony
9 Nobles and Harry Moll.

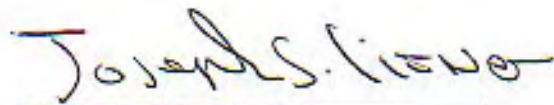
10 19. I requested the return of all monies that I had invested.

11 20. When no return of funds was forthcoming, I felt I had no choice but to file legal
12 actions against Harry Moll and Anthony Nobles for fraud. Both of these actions were ultimately
13 settled.

14 21. The stock fraud allegations as well as the fraudulent representations made by
15 Anthony Nobles regarding his background and education were extensively reported by a
16 investigative reporter named David Baines, who wrote for the *Vancouver Sun*.

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18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct.

20 Executed on December 31, 2013, at Vancouver, British Columbia, Canada.

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24 Joseph S. Litner, M.D.