

1 Terence Geoghegan/Bar No. 169765
 2 THE LAW OFFICES OF TERENCE GEOGHEGAN
 3 A PROFESSIONAL CORPORATION
 4 5743 Corsa Avenue, Suite 208
 5 Westlake Village, CA 91362-6465
 6 (818) 991-3435
 7 (805) 435-7495 Fax
 8 tg@tgtriallawyer.com

9 Attorneys for Defendants:
 10 HAROLD KARAKA and HK ENTERPRISES

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 12 IN AND FOR THE COUNTY OF LOS ANGELES
 13 NORTHWEST DISTRICT

14 DR. ANTHONY NOBLES, an individual,)
 15 Plaintiff,)
 16 v.)
 17 KARL RYLL, *et al.*,)
 18 Defendants.)

Case No. LC 100903

Assigned for All Purposes to the
 Honorable Huey P. Cotton

Department D

Complaint Filed: October 11, 2013
 Discovery Cut-Off: Per Code
 Motion Cut-Off: Per Code
 Trial Date: October 20, 2014

DECLARATION OF HARRY MOLL IN
 SUPPORT OF DEFENDANTS' SPECIAL
 MOTION TO STRIKE COMPLAINT PURSUANT
 TO CALIFORNIA'S ANTI-SLAPP STATUTE
 (*Code of Civil Procedure* §425.16)

Date: Thursday, February 6, 2014
 Time: 8:30 a.m.
 Dept: D

24 **DECLARATION OF HARRY MOLL**

25 I, HARRY MOLL, declare:

26 1. I am over the age of eighteen, have personal knowledge of the facts contained
 27 herein and would and could testify competently thereto if called as a witness.
 28

1 2. I first met Anthony Nobles about 22 years ago at a medical conference in San
2 Francisco, California. He was introduced to me by John R. Crew, M.D., in an operating room.
3 At that time, Dr. Crew was the Director of Cardiovascular Surgical Research for the San
4 Francisco Heart Institute at Seton Medical Center.

5 3. My job at the time was to secure funding for companies trying to go public on the
6 Vancouver Stock Exchange. I personally represented a company at that time called Northfork
7 Ventures, Ltd.

8 4. Mr. Nobles claimed to be the founder, chairman and chief executive officer of
9 Surgical Visions Inc., of California. He described himself as an inventor of medical instruments
10 to assist in surgical procedures. At that time, Mr. Nobles told me that he was a physician and
11 surgeon. I often observed that he liked to wear surgical scrubs, the type of dress a medical
12 professional would wear while on rounds seeing patients or in a hospital. On several occasions
13 when I visited his offices, I personally observed that Nobles had no less than eight diplomas on
14 his wall, all bearing the name of Anthony Nobles, one of which appeared to be issued by the
15 State of California.

16 5. He also told me that he held advanced university degrees.

17 6. Mr. Nobles told me that he was interested in my efforts on behalf of Northfork,
18 and told me that he too was looking for capital to expand his medical instrument research
19 company and that he had invented a device to assist in surgery. I suggested to Mr. Nobles that I
20 might be able to arrange for investment money by way of merging his company into Northfork.
21 He agreed to do so.

22 7. When the merger took place and the stock was being offered on the Vancouver
23 Stock Exchange, it raised between 10 and 20 million dollars U.S.

24 8. In the course of preparing for a stock offering in the United States, certain due
25 diligence was required and we at Northfork hired Kroll Associates, a U.S. investigative
26 organization, to make certain the offering met all the requirements of the New York Stock
27 Exchange and the NASDAQ Stock Exchange.

28 ///

1 9. At our direction, Kroll reported directly to me and the board of directors of
2 Northfork Ventures, Ltd., that they had discovered facts that directly contradicted Mr. Nobles'
3 claims.

4 10. The report that was prepared at my direction stated that both UCLA and the
5 University of Texas confirmed that he did not have any advanced degrees for either institution.

6 11. The report also stated Nobles had attended the University of Texas for two years,
7 but never graduated. The report included declarations from officials of both universities as to the
8 facts presented in the report.

9 12. When confronted with these facts, Nobles claimed that the UCLA doctorate was
10 actually in cooperation with the University of Munich, in Germany. However, he produced no
11 documentation to support this claim. And he did not dispute the report that he did not have the
12 other degrees that he claimed to have had. It was not until the investigation by Kroll Associates
13 into Nobles's background, and the subsequent explanations offered by Nobles regarding his past
14 records, that I realized that the university diplomas on Nobles's office wall were fraudulent.

15 13. After the findings of the investigation by Kroll were given to me, I personally
16 confronted Nobles about the findings regarding his fraudulent claims of being a surgeon, and the
17 lack of any academic record of his ever having graduated from any university of which he had
18 claimed to be an alumnus. At that point, Mr. Nobles offered a truly strange explanation. He
19 claimed that he was working with the CIA, and that the CIA had purged all of his past records so
20 that his association with the CIA, and certain secret documents, and his work with aliens in
21 Roswell, New Mexico, would remain classified.

22 14. Upon discovery of these facts, Northfork promptly notified the Vancouver Stock
23 Exchange, and stock trading for Northfork was halted immediately.

24 15. The whole offering was later canceled, and many stock-holders lost their money.
25 The Vancouver Stock Exchange ordered Mr. Nobles never to do any stock trading business in
26 Canada again.

27 ///

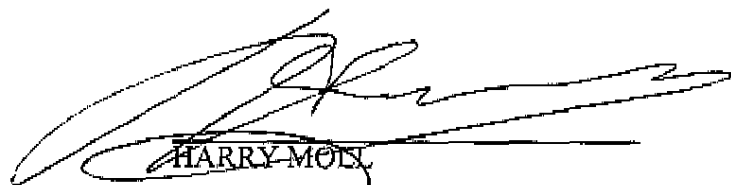
28 ///

1 16. I have personal knowledge of the order of the Vancouver Stock Exchange,
 2 because it directly affected the transaction that I, and Northfork, had invested in. I personally lost
 3 a large amount of money that I had invested in the deal. Later, I was personally sued by one
 4 investor, Dr. Litner, for my role in enabling Mr. Nobles to perpetrate this fraud. To settle the
 5 lawsuit, I was forced to turn over to Dr. Litner my ownership of my ski chalet in Whistler
 6 Mountain, British Columbia, Canada. This cost me approximately \$500,000.00, in addition to the
 7 money that I lost from my personal investment.

8 17. Because of the recklessness of Mr. Nobles, my reputation was tarnished and that
 9 failed event still follows me today. My ability to make a good living has been hurt by that
 10 Canadian stock exchange embarrassment.

11
 12 I declare under penalty of perjury under the laws of the State of California that the
 13 foregoing is true and correct.

14 Executed on January 31, 2014, at Palm Springs, California.

15
 16
 17 
 18 HARRY MOLL
 19
 20

21
 22
 23
 24
 25
 26
 27
 28 

TRANSMISSION VERIFICATION REPORT

TIME : 01/31/2014 14:39
NAME : GEOGHEGAN LAW OFFICE
FAX : 8054357495
TEL : 8189913435
SER. # : U62702K1N215623

DATE, TIME	01/31 14:36
FAX NO./NAME	19498332281
DURATION	00:02:52
PAGE(S)	06
RESULT	OK
MODE	STANDARD

THE LAW OFFICES OF
TERENCE GEOGHEGAN
A PROFESSIONAL CORPORATION

TELEPHONE
(805) 765-9360
(818) 991-3435

— TG@TGTRIALLAWYER.COM —

5743 CORSA AVENUE
SUITE 208
WESTLAKE VILLAGE
CALIFORNIA 91362-6465
WWW.TGTRIALLAWYER.COM

E-FAK
(805) 435-7495

FACSIMILE COVER SHEET

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED, AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING THE MESSAGE TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE, AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE, THANK YOU.

Date: **January 31, 2014**

To: **John D. van Loben Sels, Esq.**
WHGC, P.L.C.

Fax Number: **(949) 833-2281**

From: **Terence Geoghegan**

Fax Number: **(805) 435-7495**

re: **Nobles v. Ryll, et al.**
Los Angeles Superior Court Case No. LC100903