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IN THE UNITED STATES DISTRICT COURT

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FOR THE DISTRICT OF ARIZONA

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XCENTRIC VENTURES, LLC, an  
Arizona Corporation, d/b/a  
"RIPOFFREPORT.COM"; ED  
MAGEDSON, an individual,

No. CV-07-0954-PHX-NVW

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**PRELIMINARY INJUNCTION**

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Plaintiffs,

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vs.

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WILLIAM "BILL" STANLEY, an  
individual; WILL "BILL" STANLEY  
d/b/a DEFAMATION ACTION.COM;  
WILL "BILL" STANLEY d/b/a  
COMPLAINTREMOVER.COM;  
WILLIAM "BILL" STANLEY aka JIM  
RICKSON; WILLIAM "BILL"  
STANLEY aka MATT JOHNSON;  
ROBERT RUSSO, an individual;  
ROBERT RUSSO d/b/a  
COMPLAINTREMOVER.COM;  
ROBERT RUSSO d/b/a  
DEFENDMYNAME.COM; ROBERT  
RUSSO d/b/a QED MEDIA GROUP,  
L.L.C.; QED MEDIA GROUP, L.L.C.)  
d/b/a DEFENDMYNAME.COM; QED  
MEDIA GROUP, L.L.C. d/b/a  
COMPLAINTREMOVER.COM;  
DEFAMATION ACTION LEAGUE, an  
unincorporated association; and  
INTERNET DEFAMATION LEAGUE,  
an unincorporated association,

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Defendants.

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1 The court having received Plaintiffs' Application for Preliminary Injunction (Doc. #  
2 2), heard argument and evidence from the parties, and issued its findings of fact and  
3 conclusions of law,  
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5 IT IS ORDERED that Plaintiffs' Application for a Preliminary Injunction (Doc. # 2)  
6 is GRANTED.

7 IT IS FURTHER ORDERED that Defendants and their officers, agents, employees,  
8 independent contractors, or other persons acting under their supervision and control or at  
9 their request are preliminarily enjoined from:

10 1. Intentionally communicating or causing to be communicated any threat  
11 of an unlawful act of violence against any of the following:

- 12 a. Ed Magedson
- 13 b. Xcentric Ventures, LLC
- 14 c. Any entity or individual that provides a business or legal  
15 service to Xcentric Ventures
- 16 d. Any entity or individual that advertises on  
17 Ripoffreport.com
- 18 e. Any customer of Xcentric or Ripoff Report
- 19 f. Any customer of any company or individual that  
20 provides a business or legal service to Xcentric Ventures
- 21 g. Any customer of any company or individual that  
22 advertises on Ripoffreport.com

23 2. Causing a distributed denial of service ("DDoS") attack against the  
24 computer server or servers of any of the following:

- 25 a. Ed Magedson
- 26 b. Xcentric Ventures, LLC
- 27 c. Any entity or individual that provides a business or legal  
28 service to Xcentric Ventures

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- d. Any entity or individual that advertises on Ripoffreport.com
  - e. Any customer of Xcentric or Ripoff Report
  - f. Any customer of any entity or individual that provides a business or legal service to Xcentric Ventures
  - g. Any customer of any entity or individual that advertises on Ripoffreport.com
3. Knowingly making, or causing to be made, and transmitting to any third party any false and defamatory statement or representation concerning any of the following:
- a. Ed Magedson
  - b. Xcentric Ventures, LLC
  - c. Any entity or individual that provides a business or legal service to Xcentric Ventures
  - d. Any entity or individual that advertises on Ripoffreport.com
  - e. Any customer of Xcentric or Ripoff Report
  - f. Any customer of any entity or individual that provides a business or legal service to Xcentric Ventures
  - g. Any customer of any entity or individual that advertises on Ripoffreport.com
4. Posting on an Internet website or using in a domain name any false and defamatory statement or representation concerning any of the following:
- a. Ed Magedson
  - b. Xcentric Ventures, LLC
  - c. Any entity or individual that provides a business or legal service to Xcentric Ventures

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- d. Any entity or individual that advertises on Ripoffreport.com
- e. Any customer of Xcentric or Ripoff Report
- f. Any customer of any entity or individual that provides a business or legal service to Xcentric Ventures
- g. Any customer of any entity or individual that advertises on Ripoffreport.com

5. Sending unsolicited spam email to any of the following:

- a. Ed Magedson
- b. Xcentric Ventures, LLC
- c. Any entity or individual that provides a business or legal service to Xcentric Ventures
- d. Any entity or individual that advertises on Ripoffreport.com
- e. Any customer of Xcentric or Ripoff Report
- f. Any customer of any entity or individual that provides a business or legal service to Xcentric Ventures
- g. Any customer of any entity or individual that advertises on Ripoffreport.com

6. Hacking into or otherwise unlawfully accessing any computer files of any of the following:

- a. Ed Magedson
- b. Xcentric Ventures, LLC
- c. Any entity or individual that provides a business or legal service to Xcentric Ventures
- d. Any entity or individual that advertises on Ripoffreport.com
- e. Any customer of Xcentric or Ripoff Report

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- f. Any customer of any entity or individual that provides a business or legal service to Xcentric Ventures
  - g. Any customer of any entity or individual that advertises on Ripoffreport.com
7. Willfully using without authorization copyrighted material owned by any of the following:
- a. Ed Magedson
  - b. Xcentric Ventures, LLC
  - c. Any entity or individual that provides a business or legal service to Xcentric Ventures
  - d. Any entity or individual that advertises on Ripoffreport.com
  - e. Any customer of Xcentric or Ripoff Report
  - f. Any customer of any entity or individual that provides a business or legal service to Xcentric Ventures
  - g. Any customer of any entity or individual that advertises on Ripoffreport.com
8. Inundating any of the following with telephone calls or emails for the purposes of harassment and the disruption of business:
- a. Ed Magedson
  - b. Xcentric Ventures, LLC
  - c. Any entity or individual that provides a business or legal service to Xcentric Ventures
  - d. Any entity or individual that advertises on Ripoffreport.com
  - e. Any customer of Xcentric or Ripoff Report
  - f. Any customer of any entity or individual that provides a business or legal service to Xcentric Ventures

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- g. Any customer of any entity or individual that advertises on Ripoffreport.com
- 9. Publicizing online any private information pertaining to the personal residence or financial affairs of any of the following:
  - a. Any individual that provides a business or legal service to Xcentric Ventures
  - b. Any individual that advertises on Ripoffreport.com
  - c. Any customer of Xcentric or Ripoff Report
  - d. Any customer of any entity or individual that provides a business or legal service to Xcentric Ventures
  - e. Any customer of any entity or individual that advertises on Ripoffreport.com
- 10. Knowingly sending or causing to be sent any email communications that falsely represent to be from any of the following:
  - a. Ed Magedson
  - b. Xcentric Ventures, LLC
  - c. Any entity or individual that provides a business or legal service to Xcentric Ventures
  - d. Any entity or individual that advertises on Ripoffreport.com
  - e. Any customer of Xcentric or Ripoff Report
  - f. Any customer of any entity or individual that provides a business or legal service to Xcentric Ventures
  - g. Any customer of any entity or individual that advertises on Ripoffreport.com

IT IS FURTHER ORDERED that Stanley remove all content incompatible with this preliminary injunction from the following websites:

- a. bryanvincentassociates.com

- 1           b.     tiscaliwatch.com
- 2           c.     mariaspeth.com
- 3           d.     mariacrimispeth.com

4           IT IS FURTHER ORDERED that Stanley take down the following websites:

- 5           a.     pmgisucks.com
- 6           b.     jaburgwilksucks.com

7           To the extent that the content of either of these two websites is not inconsistent with  
8 this preliminary injunction, it may be re-posted on a website with a domain name that is also  
9 not inconsistent with this preliminary injunction.

10          IT IS FURTHER ORDERED that Stanley make reasonable efforts to remove or have  
11 removed any content incompatible with this preliminary injunction from the following  
12 websites:

- 13           a.     members.greenpeace.org/gpblog/xmlsrv/rss2.php?blog=10169
- 14           b.     my.opera.com/mariaspeth/blog/
- 15           c.     mariaspeth.blogspot.com/
- 16           d.     members.greenpeace.org/blog/maria\_speth
- 17           e.     mariaspeth.blogspot.com/atom.xml
- 18           f.     maria-speth.blog-city.com/read\_about\_maria\_speth\_here.htm
- 19           g.     forums.treemedia.com/fb/archive/index.php/t-634.html
- 20           h.     claimid.com/speth-maria
- 21           i.     mariaspeth.alkablog.com/archive.html
- 22           j.     express-press-release.com/16/RIPOFF%20REPORT%20VICTIMS-  
23                 %20ARE%20YOU%20A%20VICTIM%20OF%20THE%20RIPOF  
24                 F%20REPORT%20AND%20ED%20MAGEDSON.php
- 25           k.     www.sta.gov.ua/forum/viewtopic.php?=3156&sid=59c099781a21bd  
26                 17ac49887a6f7c3f0e
- 27           l.     www.cchc.org/cchcforums/viewtopic.php?t=8251&sid=4e70b4c46e  
28                 59b8651532e9ef42ff7b7f

- 1 m. [kinja.com/user/beasiswa/default/all](http://kinja.com/user/beasiswa/default/all)
- 2 n. [www.kommersant.comch.ru/forum/viewtopic.php?p=5995&sid=898](http://www.kommersant.comch.ru/forum/viewtopic.php?p=5995&sid=89876dfc2ec09a95f8e972031a10d9f0)
- 3 [76dfc2ec09a95f8e972031a10d9f0](http://www.kommersant.comch.ru/forum/viewtopic.php?p=5995&sid=89876dfc2ec09a95f8e972031a10d9f0)
- 4 o. [elec.chandra.ac.th/forum/viewtopic.php?t=2314](http://elec.chandra.ac.th/forum/viewtopic.php?t=2314)
- 5 p. [www.habib.myfreebb.com/viewtopic.php?p=900&sid=494a2df12b4](http://www.habib.myfreebb.com/viewtopic.php?p=900&sid=494a2df12b48a1e8fdca8ae0e7bfb752)
- 6 [8a1e8fdca8ae0e7bfb752](http://www.habib.myfreebb.com/viewtopic.php?p=900&sid=494a2df12b48a1e8fdca8ae0e7bfb752)
- 7 q. [www.digg.com/view/world\\_business/upcoming/page144](http://www.digg.com/view/world_business/upcoming/page144)
- 8 r. [harrypotterworld.myfreebb.com/viewtopic.php?p=1693&sid=494a2d](http://harrypotterworld.myfreebb.com/viewtopic.php?p=1693&sid=494a2df12b48a1e8fdca8ae0e7bfb752)
- 9 [f12b48a1e8fdca8ae0e7bfb752](http://harrypotterworld.myfreebb.com/viewtopic.php?p=1693&sid=494a2df12b48a1e8fdca8ae0e7bfb752)
- 10 s. [www.alkablog.com/profil\\_mariaspeth.html](http://www.alkablog.com/profil_mariaspeth.html)
- 11 t. [bloop.org/board/viewforum.php?f=1&sid=de117ba3612a98bd04b78](http://bloop.org/board/viewforum.php?f=1&sid=de117ba3612a98bd04b7882b1f7c508d)
- 12 [82b1f7c508d](http://bloop.org/board/viewforum.php?f=1&sid=de117ba3612a98bd04b7882b1f7c508d)
- 13 u. [www.changsdomain.net/forum/search.php?search\\_id=unanswered&s](http://www.changsdomain.net/forum/search.php?search_id=unanswered&sid=720766454895e6a007993bf05a032d56)
- 14 [id=720766454895e6a007993bf05a032d56](http://www.changsdomain.net/forum/search.php?search_id=unanswered&sid=720766454895e6a007993bf05a032d56)
- 15 v. [warning-thievesatfastbucks.com](http://warning-thievesatfastbucks.com)
- 16 w. [www.alkablog.com/annuaire\\_business\\_5\\_0.html](http://www.alkablog.com/annuaire_business_5_0.html)
- 17 x. [www.sta.gov.ua/forum/search.php?search\\_author=additional2&sid=](http://www.sta.gov.ua/forum/search.php?search_author=additional2&sid=c2cd4dcb555cff8f6cbb41ec5332675a)
- 18 [c2cd4dcb555cff8f6cbb41ec5332675a](http://www.sta.gov.ua/forum/search.php?search_author=additional2&sid=c2cd4dcb555cff8f6cbb41ec5332675a)
- 19 y. [clearblogs.com/spethmaria](http://clearblogs.com/spethmaria)
- 20 z. [digg.com/business\\_finance/Maria\\_Speth](http://digg.com/business_finance/Maria_Speth)
- 21 aa. [design.netscape.com/story/2007/05/12/maria-speth](http://design.netscape.com/story/2007/05/12/maria-speth)
- 22 bb. [maria-speth.blog-city.com](http://maria-speth.blog-city.com)
- 23 cc. [claimid.com/mariaspeth](http://claimid.com/mariaspeth)
- 24 dd. [maria-speth.blog-city.com/index.cfm?d=12&m=5&y=2007](http://maria-speth.blog-city.com/index.cfm?d=12&m=5&y=2007)
- 25 ee. [digg.com/business\\_finance/Maria\\_Speth\\_2](http://digg.com/business_finance/Maria_Speth_2)
- 26 ff. [20six.co.uk/maria-speth/contact](http://20six.co.uk/maria-speth/contact)
- 27 gg. [members.greenpeace.org/gpblog/?pview=recent&limit=more](http://members.greenpeace.org/gpblog/?pview=recent&limit=more)
- 28 hh. [mariaspeth.bloggerteam.com](http://mariaspeth.bloggerteam.com)



- 1 ii. mariaspeth.alkablog.com
- 2 jj. secureusa.greenpeace.org/gpblog
- 3 kk. forums.treemedia.com/fb/showthread.php?goto=newpost&t=3299
- 4 ll. kinja.com/user/beasiswa/default/all
- 5 mm. www.alkablog.com/profil\_mariaspeth.html
- 6 nn. www.voyblogs.com/default.asp

7 IT IS FURTHER ORDERED that Defendants shall ensure that all of their officers,  
8 agents, members, employees, independent contractors, or other persons acting under their  
9 supervision and control or at their request receive a copy of this preliminary injunction and  
10 are appropriately advised as to its terms and conditions.

11 IT IS FURTHER ORDERED that this preliminary injunction applies to Defendants  
12 regardless of the name or names they use or go by or may in the future use or go by.

13 IT IS FURTHER ORDERED that Defendants shall not delete or destroy any  
14 evidence, including but not limited to computer reproduced or saved data or any other form  
15 of evidence pertaining to Xcentric, Magedson, or Ripoff Report.


16 IT IS FURTHER ORDERED that Plaintiffs will provide a copy of this order to each  
17 Defendant who has not appeared in this case as soon as possible.

18 IT IS FURTHER ORDERED that the court may grant additional injunctive relief in  
19 the future if shown to be necessary.

20 IT IS FURTHER ORDERED that the \$5,000 temporary restraining order bond  
21 previously posted in this case shall serve as the preliminary injunction bond under Fed.  
22 R.Civ. P. 65. This preliminary injunction is effective immediately.

23 DATED this 21<sup>st</sup> day of June, 2007.

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Neil V. Wake  
United States District Judge