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 7  
 8 **IN THE UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF ARIZONA**

10  
 11 XCENTRIC VENTURES, LLC, an Arizona  
 12 corporation, d/b/a "RIPOFFREPORT.COM";  
 ED MAGEDSON, an individual

Case No: 2:07-cv-00954-NVW

13 Plaintiffs,

**MOTION FOR ORDER TO SHOW  
 CAUSE RE: CONTEMPT**

14 v.

15 WILLIAM "BILL" STANLEY, an  
 16 individual; WILLIAM "BILL" STANLEY  
 d/b/a DEFAMATION ACTION.COM;  
 17 WILLIAM "BILL" STANLEY d/b/a  
 COMPLAINTREMOVER.COM; WILLIAM  
 18 "BILL" STANLEY aka JIM RICKSON;  
 WILLIAM "BILL" STANLEY aka MATT  
 19 JOHNSON; ROBERT RUSSO, an  
 individual; ROBERT RUSSO d/b/a  
 20 COMPLAINTREMOVER.COM; ROBERT  
 RUSSO d/b/a DEFENDMYNAME.COM;  
 21 ROBERT RUSSO d/b/a QED MEDIA  
 GROUP, L.L.C.; QED MEDIA GROUP,  
 22 L.L.C.; QED MEDIA GROUP, L.L.C. d/b/a  
 DEFENDMYNAME.COM; QED MEDIA  
 23 GROUP, L.L.C. d/b/a  
 COMPLAINTREMOVER.COM;  
 24 DEFAMATION ACTION LEAGUE, an  
 unincorporated association; and INTERNET  
 25 DEFAMATION LEAGUE, an  
 unincorporated association;

26 Defendants.  
 27  
 28

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1 ROBERT RUSSO, an individual; QED  
2 MEDIA GROUP, L.L.C., a Maine limited  
liability corporation,

3 Counterclaimants,

4 v.

5 ED MAGEDSON, an individual,

6 Counterdefendant.  
7

8 Plaintiffs Xcentric Ventures, LLC (“Xcentric”) and Ed Magedson (“Magedson”)  
9 (collectively, “Plaintiffs”) hereby move this Court for an Order that Defendants William  
10 Stanley and Robert Russo appear and show cause why they should not be held in  
11 contempt of Court for having failed to fully comply with the Preliminary Injunction issued  
12 by this Court on June 21, 2007.

13 This Motion is supported by the following Memorandum and the entire record in  
14 this matter.

15 **MEMORANDUM OF POINTS AND AUTHORITIES**

16 **I. INTRODUCTION**

17 As articulated in the Findings of Fact & Conclusions of Law entered by this Court  
18 on June 21, 2007, a number of legal violations have been committed by all Defendants.  
19 The two individuals named in the Complaint, William Stanley and Robert Russo, are key  
20 in orchestrating the egregious activities directed at or relating to Plaintiffs. Unfortunately,  
21 despite clear instructions in the Preliminary Injunction, Defendants William Stanley and  
22 Robert Russo have continued to act personally and instruct the actions of others in direct  
23 violation of the Preliminary Injunction. Such conduct is of the exact type which the  
24 Preliminary Injunction was designed to prevent, and a contempt finding is appropriate.  
25

26 **II. WILLIAM STANLEY IS IN CONTEMPT**

27 Defendant William Stanley is a professional spam operator who displays his  
28 disdain for the legal system with reckless abandon. Stanley owns and operates a number

1 of spam-related websites, including videowebsites.com, complaintremover.com, remove-  
 2 rip-off-reports.com, repsavior.com, and ironserver.com, as well as a number of websites  
 3 identified in the Preliminary Injunction, such as jaburgwilksucks.com, using the trade  
 4 name “Reputation Management”<sup>1</sup>. Stanley has let it be known, in no uncertain terms, that  
 5 he will not comply with any order from this Court. (Exhibit “1”). True to his word,  
 6 Stanley has engaged in numerous activities which are in direct violation of the  
 7 Preliminary Injunction.

8 Although Defendant Stanley oftentimes claims to be located in Austria, he actually  
 9 resides in the United States. He has or had a driver’s license in Florida and he served time  
 10 in federal prison in Florida. (Exhibit “2”). He has operated companies and maintained  
 11 addresses in Texas. (Exhibit “3”). His websites are registered through various different  
 12 companies, listing various different locations for the registrant. Currently, his websites  
 13 show the following registration information:

Website Name	Domain Registrar	Registrant Name	Registrant Contact	IP Address	IP Location
defamationaction.com	Enom, Inc.	Reputation Management	8 Redetsky Strasse, Klagenfurt, Austria 9020	1.1.1.1	Unknown
videowebsites.com	Domaindiscover	William Stanley	8 Redetsky Strasse, Klagenfurt, Austria 90201	193.200.50.20	Bulgaria
ironserver.com	Enom, Inc.	Lumbermax	300 Gonzales, Austin, TX 78702	66.185.126.188	US – Illinois – Palatine
remove-rip-off-reports.com	Enom, Inc.	Reputation Management	8 Redetsky Strasse, Klagenfurt, Austria 9020	80.109.231.5	Austria – Wien – Vienna
repsavior.com	Enom, Inc.	Reputation Management	8 Redetsky Strasse, Klagenfurt, Austria 9020	80.109.231.5	Austria – Wien – Vienna
complaintremover.com	Communigal Communications Ltd.	Lea Schurz	P.O. Box 893 Tilden, TX 68781	1.1.1.1	Unkown
bryanvincentassociates.com	Enom, Inc.	Reputation Management	8 Redetsky Strasse, Klagenfurt, Austria 9020	80.109.231.7	Austria – Wien – Vienna
tiscalivatch.com	Enom, Inc.	Reputation Management	8 Redetsky Strasse, Klagenfurt, Austria 9020	80.109.231.7	Austria – Wien – Vienna
mariaspeth.com	Enom, Inc.	Reputation Management	8 Redetsky Strasse, Klagenfurt, Austria 9020	193.200.50.20	Bulgaria

<sup>1</sup> Defendant Stanley can be linked to the name “Reputation Management” through the email address given with the website registrations. The registrant “Reputation Management” lists his contact information as geographicalseo@gmail.com, which is a known email address for Stanley. Stanley has also been known to use the email addresses overstock@gmail.com and wssbill@yahoo.com, among others.

1	mariacrimispeth.com	Enom, Inc.	Reputation Management	8 Redetsky Strasse, Klagenfurt, Austria 9020	193.200.50.20	Bulgaria
2	pmgisucks.com	Enom, Inc.	Reputation Management	8 Redetsky Strasse, Klagenfurt, Austria 9020	80.109.231.7	Austria – Wien – Vienna
3	jaburgwilksucks.com	Enom, Inc.	Reputation Management	8 Redetsky Strasse, Klagenfurt, Austria 9020	193.200.50.20	Bulgaria

4  
 5 *See* Exhibit “4”, website registration information from NetworkSolutions. Six of these  
 6 websites are in violation of the Preliminary Injunction in numerous ways. The  
 7 Preliminary Injunction specifically addressed these six websites, requiring that two of  
 8 them be removed in their entirety (pmgisucks.com and jaburgwilksucks.com) and that the  
 9 remaining four remove all false and defamatory conduct. To date, all of the websites still  
 10 remain active with the false and defamatory content still present. This is a direct violation  
 11 of the Preliminary Injunction.

12 Stanley continues to propound the false and defamatory statements addressed in the  
 13 Preliminary Injunction. As noted in the Preliminary Injunction and the Findings of Fact,  
 14 false and defamatory statements had been posted on numerous websites and are  
 15 discoverable through search engines such as Google and Yahoo. Not only have most of  
 16 these statements not been removed, additional defamatory statements have recently been  
 17 discovered by Plaintiffs.

18 The new defamatory statements are in direct violation of the Preliminary Injunction  
 19 in numerous ways. Specifically, the Preliminary Injunction prohibits all Defendants,  
 20 including Stanley, from “[p]osting on an Internet website or using in a domain name any  
 21 false and defamatory statement or representation...” Stanley continues to do just that.  
 22 *See* List of Websites, Exhibit “5.”

23 All of the registration information provided by Stanley d/b/a Reputation  
 24 Management lists a telephone number of (512) 853-9790. A reverse telephone lookup  
 25 shows that this is a land line located in Austin, Texas.<sup>2</sup> Stanley has previously resided in  
 26

27  
 28 <sup>2</sup> Search performed on July 24, 2007 by using  
[whitepages.com/10001/search/ReversePhone?phone=%28512%29+853-9790](http://whitepages.com/10001/search/ReversePhone?phone=%28512%29+853-9790).

1 Austin, Texas, and there is a possibility he currently resides there, or least retains ties to  
 2 that area.

3 **III. ROBERT RUSSO IS IN CONTEMPT**

4 Defendant Robert Russo has engaged in technological subterfuge in an attempt to  
 5 hide his illegal activities from this Court. Continually, Russo has pointed the finger at  
 6 Stanley and has claimed a lack of relationship between the two parties, all the while  
 7 professing his supposed “innocence.” The preliminary injunction applies to Defendants  
 8 and their “agents” or “other persons acting under their supervision and control or at their  
 9 request.” There can be no dispute that if Stanley is acting as Russo’s agent or if Stanley’s  
 10 acts of contempt were performed under the supervision and control of Russo or at Russo’s  
 11 request, then Russo is in contempt as well. Although he has continually insisted to this  
 12 Court otherwise, a strong, demonstrable link can be made between Stanley and Russo.

13 Defendant Russo is the CEO and owner of QED Media Group, LLC. He admits  
 14 that he does business as defendmyname.com, interactiveivideosystems.com, and  
 15 internetdefamationleague.com. Russo’s internet activity leaves no doubt that Stanley is  
 16 acting as an agent of Russo, under Russo’s supervision and control, and at Russo’s  
 17 request. Russo and Stanley continue to act in concert to violate this Court’s Orders. The  
 18 internet activity of Russo is summarized accurately below, and provides the Court with  
 19 ample evidence to demonstrate the relationship between Russo and Stanley.

Website Name	Registrar	Registrant Name	Registrant Contact	IP Address	IP Location
Qedmediagroup.com	Network Solutions	QED Media Group	Robert Russo c/o Network Solutions	66.185.126.189	US – Illinois - Palatine
defendmyname.com	Enom, Inc.	QED Media Group, LLC	54 North St. Portland, ME 04101	66.185.126.189	US - Illinois - Palatine
interactiveivideosystems.com	Enom, Inc.	QED Media Group, LLC	1124 Brighton Ave, Suite 27 Portland, ME 04101	193.200.51.180	Bulgaria
internetdefamationleague.com	Communal Communications Ltd.	True Domain Privacy	95 Sterneck Strasse, Klagenfurt, Austria	80.109.231.7	Austria – Wien - Vienna

1 See Exhibit “6”, website registration information from NetworkSolutions. As the Court  
2 can see, the IP address for Russo’s website.defendmyname.com is nearly *identical* to the  
3 IP address for Stanley’s website ironserver.com. This is no coincidence. Additionally, the  
4 IP address for Russo’s website internetdefamationleague.com is *exactly the same* as the IP  
5 address for Stanley’s websites bryanvincentassociates.com, tiscaliwatch.com, and  
6 pmgisucks.com. Again, this is no coincidence.

7 “An IP address (Internet Protocol address) is a unique address that certain  
8 electronic devices use in order to identify and communicate with each other on a computer  
9 network utilizing the Internet Protocol standard (IP)—in simpler terms, a computer  
10 address.” [http://en.wikipedia.org/wiki/Internet\\_protocol\\_address](http://en.wikipedia.org/wiki/Internet_protocol_address) (visited August 20,  
11 2007). “IP addresses can appear to be shared by multiple client devices either because  
12 they are part of a shared hosting web server environment or because a network address  
13 translator (NAT) or proxy server acts as an intermediary agent on behalf of its customers,  
14 in which case the real originating IP addresses might be hidden from the server receiving  
15 a request.” [http://en.wikipedia.org/wiki/Internet\\_protocol\\_address](http://en.wikipedia.org/wiki/Internet_protocol_address) (visited August 20,  
16 2007).

17 Thus, that Stanley and Russo’s websites share an IP address indicates that either  
18 they emanate from the same computer server, or at least that they share a web host server.

19 Another strong indicia of the relationship between Stanley and Russo is shown  
20 through Stanley’s actions on May 23, 2007. As of May 16, 2007, the domain server for  
21 the websites jaburgwilksucks.com, mariacrimispeth.com and mariaspeth.com were  
22 ns1.xtrasupply.com. See Exhibit “7”, previous website registration information. When  
23 “ns1.xtrasupply.com” was entered as a website, the user was linked directly to  
24 videowebsites.com, a Russo website. See Exhibit “8”, previous website registration  
25 information. At the hearing on May 17, 2007, counsel for Plaintiffs explained the  
26 redirection of the websites to the Court. Stanley was not in attendance at this hearing, but  
27 Russo was. The contents of the hearing were not published anywhere. Yet on May 23,  
28 2007, just five days later, Stanley relocated the domain server for the website

1 jaburgwilksucks.com to ns10.xtrasupplycom, which does not directly link to  
2 videowebsites.com. See Exhibit “9”, website registration information from  
3 NetworkSolutions. The only way that Stanley could have known the link between the  
4 websites was raised as an issue was for Russo to tell him. More importantly, Russo had  
5 enough control over Stanley to cause Stanley to re-direct the server and remove that link  
6 between Russo and Stanley.

7 Various websites allow spammers such as Stanley and Russo to post their  
8 propaganda for free. In April, 2006, an advertisement was posted for Stanley’s website  
9 ironserver.com at <http://lists.open-bio.org/pipermail/ontologies/2006-April.txt>. See  
10 Exhibit “10”, printout from website. This advertisement was posted from “unix at  
11 techfiesta.com”. See Exhibit “10”. In the posting, a telephone number is provided for  
12 individuals interested in his website to contact him. The listed telephone number is (207)  
13 899-2332. See Exhibit “10”. The subsequent posting at this website is also from “unix at  
14 techfiesta.com”. See Exhibit “10”. This second posting was made on behalf of  
15 defendmyname.com, which is Russo’s website. See Exhibit “10”. In this second posting,  
16 the telephone number provided is shown as (207) 899-2332. See Exhibit “10”. Thus,  
17 Stanley and Russo posted ads one after the other, both from unix at techfiesta and both  
18 using the same telephone number is used to contact both Stanley and Russo. Without a  
19 doubt, they have and continue to be working together as a singular entity.

20 Similarly, the registration for interentdefamationleague.com (Russo’s group) lists  
21 the registrant as residing in Klagenfurt Austria, the same city as Stanley lists in his  
22 registrations and uses the identical telephone number as that provided by Stanley for a  
23 vast number of his website registrations. See Exhibits “11, 4”, website registrations from  
24 NetworkSolutions.

25 Another connection between Stanley and Internet Defamation League can be  
26 shown through the email which Stanley sent to Prolexic, the former host for the ROR  
27 websites. In his email, Stanley signed his name “Internet Defamation League.” See  
28



1 Email from Stanley to Prolexic, Exhibit “12”. Stanley represented himself to be an agent  
2 of Russo’s group.

3 Another telephone number can also link Stanley’s complaintremover.com to  
4 Russo’s defendmyname.com. As shown on both websites, the telephone number provided  
5 is identical – 1-866-268-5588. *See* Exhibits “13, 14”, printout from Complaint Remover  
6 and DefendMyName. This telephone number is also the same telephone number provided  
7 by Russo on the website for his company, QED Media Group. *See* Exhibit “15”, printout  
8 from QED Media Group. Indeed, the content on Stanley’s “Complaint Remover” website  
9 quotes only one person in support of the business – Robert Russo.

10 That toll free number is not the only link between Stanley’s videowebsites.com and  
11 Russo’s interactivevideosystems.com. The content on these two websites are identical.  
12 *See* Exhibit “16, 17”, printout from InteractiveVideoSystems and VideoWebsites. Also,  
13 more importantly, the content on Stanley’s website states that the copyright is owned by  
14 InteractiveVideoSystems, “a division of qedmediagroup LLC”. *See* Exhibit “8”, printout  
15 from InteractiveVideoSystems and VideoWebsites. The relationship between Stanley and  
16 Russo is an ongoing one, with their association going back for a number of years.

17 Another connection can also be made between Stanley and Russo by exploring  
18 Stanley’s website IronServer.com. The IronServer.com website is hosted by  
19 qedhosting.com. *See* Exhibit “18”, printout from IronServer.com. QED is the name of  
20 Russo’s company, although the registration of qedhosting.com lists the registrant as  
21 “Database” located in Suceava, Texas and the IP location as Vienna Austria. *See* Exhibit  
22 “19.”

23 It is entirely disingenuous for Russo to claim that Stanley is not his agent or that  
24 Stanley’s acts of contempt are not under his supervision or control. The two parties have  
25 a long history of sharing and acting on shared information, sharing computer servers,  
26 sharing website content, and using the same telephone numbers. Moreover, Stanley began  
27 his attack on Plaintiff with a letter he signed as an agent of Russo’s company.  
28



1 **IV. REASONABLE EFFORTS HAVE BEEN MADE BY PLAINTIFFS TO**  
2 **OBTAIN COMPLIANCE WITH THE PRELIMINARY INJUNCTION**

3 Between July 12, 2007 and July 30, 2007, Plaintiffs mailed, e-mailed, and faxed  
4 letters to all known and discoverable contacts for all websites expressly identified in the  
5 Preliminary Injunction. A sample copy of one of the letters that went out is attached  
6 hereto as Exhibit "20". Certain companies and/or individuals have responded favorably to  
7 the letters, and some of the websites have had the content removed. However, a large  
8 number of the companies who host the websites with the infringing content have chosen  
9 not to acknowledge the authority of this Court to require the specifically identified content  
10 to be removed. Further, after the letters were sent, the same content continues to be  
11 posted on additional websites. A list of websites whose content remains unabated by the  
12 Preliminary Injunction is attached hereto as Exhibit "5", and was current as of August 21,  
13 2007.

14 **V. CONCLUSION**

15 It is appropriate for the Court to order the Defendants William Stanley and Robert  
16 Russo to show cause why an order of civil contempt should not be issued against them  
17 and to award Plaintiffs their reasonable damages proximately caused by Defendants'  
18 contempt of court. Plaintiffs request that the Court set a hearing ordering Defendants  
19 William Stanley and Robert Russo to appear and show cause why they should not be held  
20 in contempt of court.

21 DATED this 30<sup>th</sup> day of August, 2007

22 **JABURG & WILK, P.C.**

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24  
25 s/ Maria Crimi Speth  
26 Maria Crimi Speth  
27 Attorneys for Plaintiffs  
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**Certificate of Service**

I hereby certify that on August 30, 2007, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing, and for transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Teresa Kay Anderson  
Snell & Wilmer LLP  
One Arizona Center  
400 E Van Buren  
Phoenix, AZ 85004

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Attorneys for Defendants Robert Russo,  
QED Media Group, LLC and Internet  
Defamation League

With a COPY of the foregoing emailed on this 30<sup>th</sup> day of August, 2007, to:

William "Bill" Stanley  
defamationaction@gmail.com  
geographicalseo@gmail.com

With a COPY of the foregoing hand delivered on the 30<sup>th</sup> day of August, 2007, to:

Honorable Neil V Wake  
United States District Court  
District of Arizona

s/Debra Gower