

EXHIBIT A

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Attorneys for Plaintiffs

10 **IN THE UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF ARIZONA**

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

Case No: 07-954-PHX-NVW

Plaintiffs,

DECLARATION OF RICK GELBER

v.

17 WILLIAM "BILL" STANLEY, an individual;
 18 WILLIAM "BILL" STANLEY d/b/a
 19 DEFAMATION ACTION.COM; WILLIAM
 20 "BILL" STANLEY d/b/a
 21 COMPLAINTREMOVER.COM; WILLIAM
 22 "BILL" STANLEY aka JIM RICKSON;
 23 WILLIAM "BILL" STANLEY aka MATT
 24 JOHNSON; ROBERT RUSSO, an individual;
 25 ROBERT RUSSO d/b/a
 26 COMPLAINTREMOVER.COM; ROBERT
 27 RUSSO d/b/a DEFENDMYNAME.COM;
 28 ROBERT RUSSO d/b/a QED MEDIA GROUP,
 L.L.C.; 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

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1 association;
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 3 Defendants.

4 I, RICK GELBER, declare the following upon my personal knowledge:

5 1. I am the President of the Taylor Wingate Group, a corporation located in
6 San Diego, CA.

7 2. On November 6, 2007, during a telephone conversation, Robert Russo
8 stated that because I paid money to Xcentric Ventures LLC's Corporate Advocacy
9 Program who he claims are extortionists, I committed an illegal act. Also, he stated that
10 he and five other parties involved in the law suit would be subpoenaing my phone, email
11 and financial records related to the matter.

12 3. As a result of a posting about Taylor Wingate Group on
13 www.ripoffreport.com, my company opted to participate in Xcentric's Corporate
14 Advocacy Program. Xcentric investigated the substance of the report, and worked with
15 me to try to resolve the consumer's complaint. Although I was doubtful about the program
16 at first, I am very pleased with the results I have received from the Corporate Advocacy
17 Program. Although the entire complaint against Taylor Wingate remains posted on the
18 www.ripoffreport.com website, as part of the Corporate Advocacy Program, Xcentric
19 placed an editorial statement in a position associated with the report so consumers know
20 that Taylor Wingate works to resolve customer complaints in a fair manner.

21 4 Approximately 3-4 weeks ago, I Googled "Taylor Wingate" and discovered
22 that the original report from www.ripoffreport.com had been re-posted on the website
23 www.repsavior.com without the editorial statement explaining how my company works to
24 resolve consumer complaints.

25 5. I contacted the telephone number listed on www.repsavior.com and spoke
26 with a man named Robert Russo. Mr. Russo told me that I should email William Stanley
27 to get the report about Taylor Wingate removed from www.repsavior.com. Mr. Russo
28 also told me that he would follow up with Mr. Stanley to get the report removed. I spoke

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1 with Mr. Russo numerous times about getting the report removed from
2 www.repsavior.com.

3 6 Approximately, on Wednesday, October 31, 2007, Mr. Russo called me to
4 let me know that the report had been taken down from www.repsavior.com.

5 7 Ed Magedson told me about the lawsuit that was going on against William
6 Stanley and Robert Russo. After Mr. Russo had the report removed from
7 www.repsavior.com, I told Ed Magedson and his attorney, Maria Speth, about the
8 removal. I also explained to both of them my conversations with Robert Russo that led to
9 the removal of the report. I asked Maria Speth to keep my name out of the lawsuit.

10 8 On November 6, 2007, I did a Google search for "Rick Gelber Taylor
11 Wingate" to make sure the report was still not appearing on www.repsavior.com. I
12 discovered that the report now appeared on another website, called
13 complaintremover.com. The report appeared as the very first search result on Google, on
14 the website www.repsavior.com.

15 9 I immediately called Robert Russo to let him know that the report was back
16 up.

17 10 When Mr. Russo answered the phone, I asked him, "How are you doing?"
18 His response was, "*A lot better than you.*"

19 11 During our phone conversation, Mr. Russo told me that Maria Speth had
20 mentioned my name and the name of my company during the November 1st hearing and
21 disclosed that I participated in the Corporate Advocacy Program.

22 12 Mr. Russo told me that he had nothing to do with re-posting the report and
23 that I should again contact Mr. Stanley to get the posting removed.

24 13 Mr. Russo stated that he was going to call me to deposition, and subpoena
25 my corporate records including phone, email and financial records relevant to this matter.
26 He further stated that that a great number of companies angry with Xcentric Ventures
27 LLC would also subpoena and depose me in support of their cause.
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14. On November 7, 2007, I told Ed about the conversation that I had with Rob Russo the previous day. I also told Ed that I was angry with him and with Maria Speth for mentioning my name in court in conjunction with this matter.

15. My conversation with Robert Russo made me feel threatened, both personally and professionally. I fear that I will be entangled in other party's litigation, or subject to internet attacks or other harassments orchestrated by Mr. Russo and/or William Stanley. I now fear for the well-being of my company, and the livelihood of my employees and my family.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 9th day of November, 2007.


Rick Gelber

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