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12 Attorney for Plaintiffs

13 Asia Economic Institute, LLC,

14 Raymond Mobrez, and

15 Iliana Llaneras

16 **UNITED STATES DISTRICT COURT**

17 **CENTRAL DISTRICT OF CALIFORNIA**

18 ASIA ECONOMIC INSTITUTE, LLC,)
19 a California LLC; RAYMOND)
20 MOBREZ an individual; and ILIANA)
21 LLANERAS, an individual,)

22 Plaintiffs,

23 vs.

24 XCENTRIC VENTURES, LLC, an)
25 Arizona LLC, d/b/a as BADBUSINESS)
26 BUREAU and/or)
27 BADBUSINESSBUREAU.COM)
28 and/or RIPOFF REPORT and/or)
RIPOFFREPORT.COM; BAD)
BUSINESS BUREAU, LLC, organized)
and existing under the laws of St.)
Kitts/Nevis, West Indies; EDWARD)
MAGEDSON an individual, and DOES)
1 through 100, inclusive,)

Defendants.

Case No.: 2:10-cv-01360-SVW-PJW

The Honorable Stephen V. Wilson

**DECLARATION OF TINA
NORRIS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
RECONSIDERATION OF ORDER
OF JULY 19, 2010 GRANTING
PARTIAL SUMMARY
JUDGMENT ON PLAINTIFFS
RICO CLAIMS PREDICATED ON
EXTORTION AND FOR
RECONSIDERATION OF ORDER
DENYING RELIEF UNDER RULE
56(F)**

Date: September 20, 2010

Time: 1:30 p.m.

Ctrm: 6

1 I, Tina Norris, hereby declares as follows:

2 1. I am a resident of the State of Iowa, over 18 years of age, and not a
3 party to this lawsuit. I have first-hand, personal knowledge of the facts set forth
4 below and, if called as a witness, I could and would testify competently thereto.

5 2. I have provided documents in this action to Plaintiffs and a
6 declaration in support of Plaintiffs' Opposition to Defendants' Motion for
7 Summary Judgment.

8 3. Over the past several years, an individual named Guadeloupe Alsidez,
9 posted over 300 negative reports about me and my company, TNT Management,
10 on RipoffReport.com.

11 4. Mr. Alsidez has a criminal record stemming from the early 1970s. He
12 has been harassing, extorting and cyber-bullying me since December 2006. His
13 wife was murdered looking through the peephole of her apartment in July of 2008.
14 Mr. Alsidez's criminal record, the personal threats and harassment I've endured,
15 and the murder of his wife concern me gravely.

16 5. I have hired three 3 law firms to stop Mr. Alsidez from the daily
17 assaults and threats he imposed on my company and life. I filed complaints against
18 Mr. Alsidez in the San Antonio, Texas Police Department, the Des Moines Iowa
19 Police Department, with the Federal Bureau of Investigation and the Victims
20 Department of the Arizona State Attorney General's Office.

21 6. I had written several times to Ripoff Report to have the reports
22 submitted by Mr. Alsidez taken down. Attached hereto as **Exhibit "A"** is a true
23 and correct copy of Report Number 242952 as it appeared on February 20, 2009.
24 This is one of the over 300 reports Mr. Alsidez posted about me and my company,
25 TNT, over the years. Report Number 242952 is filed under C Taylor, but it
26 discusses TNT Management extensively and provides my business address and
27 phone numbers. Report Number 242952 was submitted on or about April 8, 2007.
28

1 7. In or around September 2008, I was attempting to post rebuttals to all
2 of the approximately 300 reports about me by Lupe Alsidez, on the advice of my
3 lawyer. Many did not post, and for at least three weeks I was unable to log in or
4 access the site.

5 8. I had posted Mr. Alsidez's criminal record as a rebuttal to several of
6 the reports he posted on RipoffReport.com about me and my company. On pages
7 5 to 11 of Exhibit A is my rebuttal to Report Number 242952, which I submitted
8 on December 15, 2008 and which Ripoff Report posted on December 17, 2008.

9 9. On June 3, 2010 at 2:52 PM Central Time, I telephoned counsel for
10 the Defendants, David Gingras at (480) xxx-xxxx. My telephone records show
11 that our call lasted 13 minutes. During our 13-minute conversation, Mr. Gingras
12 advised me that he would be willing to provide assistance in removing the negative
13 postings as well as providing the IP addresses of the anonymous posters of the
14 reports about me on RipOffReport if I provided him with case files that I had
15 previously obtained against an individual who was stalking me. Mr. Gingras stated
16 that he would discuss the matter of removing my negative items with Ed
17 Magedson.

18 10. During the course of this conversation, Mr. Gingras asked me if I was
19 recording the call. I told him I was not recording it and Mr. Gingras told me he was
20 not recording the call either. Attorney Gingras led me to believe that it was
21 possible to have items removed.

22 11. Mr. Gingras further stated that he would talk to Magedson and that he
23 would help to take down the reports and photographs of me posted on Ripoff
24 Report. Mr. Gingras told me that he would talk to Ed Magedson about providing
25 the IP addresses of the poster. Mr. Gingras asked me to provide the FBI case files
26 and lawsuits for the persons that is cyber-stalking me, including an individual
27 named Molli Funk.
28

1 12. I spent the entire Saturday of June 5, 2010 gathering FBI documents
2 and case files to provide to Mr. Gingras.

3
4
5 13. I understand that on June 8, 2010, Plaintiffs took the deposition of Ed
6 Magedson and that many of my documents were used.

7 14. I have provided Mr. Gingras with my civil case files against the
8 individuals who have been cyberstalking, bullying and harassing me over the
9 years.

10 15. On June 9, 2010 at 3:02 p.m., I received an email from Mr. Gingras, a
11 true and correct of which is attached hereto as **Exhibit "C."**

12 16. In the he June 9, 2010 email, Mr. Gingras stated:

13
14 "Tina,

15 I have received all of your emails over the last week and, if possible, will
16 respond to you further once I have a chance to review them; unfortunately
17 this won't be for a little while.

18 However, before I do so, I need to ask you something – do you believe that
19 you have been the victim of extortion or attempted extortion by Mr.
20 Magedson or the Ripoff Report? I have recently learned that you may be
21 making such a claim and if that's so, I need to understand the basis for that
22 allegation as well as your intentions before I can move forward with
23 responding to your emails.

24 David Gingras, Esq."

25 Exhibit C (emphasis added).

26 17. I did not respond to Mr. Gingras' email. I have not had any contact
27 with Mr. Gingras since then, by phone, email or otherwise.
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18. The reports about me on Ripoff Report remain. They have not been removed or redacted, even though I provided Mr. Gingras with all my civil case files as he requested.

Pursuant to 28 U.S.C., Section 1746, I declare under penalty of perjury under the Laws of the United States of America that the foregoing is true and correct.

Executed: ^{Aug} July 23, 2010 at Des Moines, Iowa


Tina Norris