David S. Gingras, CSB #218793 Gingras Law Office, PLLC 4072 E Mountain Vista Dr. Phoenix, AZ 85048 Tel.: (480) 668-3623 Fax: (480) 248-3196 David.Gingras@webmail.azbar.org Maria Crimi Speth, (Admitted Pro Hac Vice) Jaburg & Wilk, P.C. 3200 N. Central Ave., Suite 2000 Phoenix, AZ 85012 Tel: (602) 248-1000 Fax: (602) 248-0522 mcs@jaburgwilk.com Attorneys for Defendants Xcentric Ventures, LLC and **Edward Magedson** UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA ASIA ECONOMIC INSTITUTE, LLC, et al., Plaintiffs, VS.

XCENTRIC VENTURES, LLC, et al.,

Defendants.

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

DECLARATION OF DAVID S. GINGRAS IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Hearing Date: Nov. 1, 2010 Time: 1:30 PM

Courtroom: 6 (Hon. Stephen Wilson)

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#### I, David S. Gingras declare as follows:

- My name is David Gingras. I am a United States citizen, a resident of the State of Arizona, am over the age of 18 years, and if called to testify in court or other proceeding I could and would give the following testimony which is based upon my own personal knowledge unless otherwise stated.
- 2. I am an attorney licensed to practice law in the States of Arizona and California, I am an active member in good standing with the State Bars of Arizona and California and I am admitted to practice and in good standing with the United States District Court for the District of Arizona and the United States District Court for the Northern, Central, and Eastern Districts of California.
- 3. Since July 2009, I have been employed as General Counsel for Plaintiff Xcentric Ventures, LLC. In my capacity as counsel for Xcentric Ventures I have been involved in the litigation of this action since its inception. I have possession of Xcentric's files relating to this case, and I am personally familiar with the contents thereof.
- 4 On May 7, 2010, I took the deposition of Plaintiff Raymond Mobrez in Los Angeles, California. Attached hereto as **Exhibit A** is a true and correct copy of portions of the condensed transcript from Mr. Mobrez's deposition which has been highlighted to identify certain portions of testimony as set forth in Defendants' Separate Statement of Facts In Support of Defendants' Motion for Summary Judgment. Exhibit A also includes true and correct copies of certain exhibits to Mr. Mobrez's deposition which reflect the same exhibit identifiers as were used during the course of the deposition.
- Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.
- EXECUTED ON: September 27, 2010.

/S/David S. Gingras David S. Gingras

#### **CERTIFICATE OF SERVICE**

I hereby certify that on September 27, 2010 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:

Mr. Daniel F. Blackert, Esq. Ms. Lisa J. Borodkin, Esq. Asia Economic Institute 11766 Wilshire Blvd., Suite 260 Los Angeles, CA 90025 Attorneys for Plaintiffs

And a courtesy copy of the foregoing delivered to: Honorable Stephen V. Wilson U.S. District Judge

/s/David S. Gingras

## UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

ASIA ECONOMIC INST	ITUTE, LLC,	)	
et al.,		)	
		)	Case No.:
	Plaintiffs,	)	2:10-CV-01360-
		)	SVW-PJW
V.		)	
		)	
XCENTRIC VENTURES,	LLC, et al.,	)	
		)	
	Defendants.	)	
		)	

DEPOSITION OF RAYMOND MOBREZ
Los Angeles, California
May 7, 2010

Reported by:
Yaelle Daneshrad
CSR No. 11754

1 1 fact? O Okav. 2 2 A They believe in that they are -- have A Basic information. 3 3 Q It's common knowledge, then? nothing to do with what the content and the way it's 4 coming from Ripoff Report to them. They asked me to 4 A Yes. 5 5 contact back again with Ripoff to take this down. Okay. Do you, do you know any witness who 6 6 will testify that Mr. Magedson or anyone associated Q Did anybody at Google tell you that Ripoff 7 7 with Xcentric Ventures wrote the title that you've Report was violating Google's terms of service? 8 8 marked on Exhibit 1A or any of the other titles in A I don't know -- I'm sure there is some 9 9 any of the other exhibits about AEI? letter or e-mail has been exchanged between me and 10 A Well, if you have a -- you can design your 10 Google. 11 website that the party can go and put a subject 11 Q Did you -- you corresponded with them via matter, and then you will post the other things. 12 12 e-mail? 13 13 When you do that, then you have a -- you A I think it's a letter. 14 14 are creating a -- you are the one who are putting O In a written letter? 15 this up to the website. They are not the one they 15 A Letter. 16 are putting on the website. 16 Q And did you get a written response? When you say "they," you mean the author? 17 17 A I believe some response came in. But when 18 18 A Author. Author is only can do is to fill I called, they are the one they were saying that, 19 19 in the forms and the blanks that you have -- you this is basically he was saying, if they are doing 20 provided. They do not have access to your 20 this, which they are doing this, violating our terms 21 21 technology, how that -of services. 22 Q The code? 22 Q In what way does creating meta tags 23 A Exactly. 23 violate Google's terms of service? What terms of 24 24 Q Right. But the actual information that service are you referring to? 25 25 appears on that line, don't you agree that that A Well, I'm not an expert, but I know just a 98 100 originated with the author? Not Ed Magedson or 1 common knowledge that by creating a -- you're taking 1 2 2 **Xcentric?** somebody's good name or at least a name that is 3 A I don't know that. 3 attractive to the web and using that to your website 4 Q You don't know either way? 4 to go up, pulling you up there. 5 5 For example, I, somebody will write A Yes. 6 Q Okay. 6 "'Westlaw' is terrible." Westlaw is on top of 7 A All I can tell you, it's there. 7 search engine. And it's always, it's people that 8 8 Q It is there. I agree with you. Let's are in it and that demands highest as possible. And 9 look at paragraph, subparagraph D of paragraph 22 on 9 somebody like Ripoff is using this methodology or 10 10 page 10 of your complaint, which is Exhibit 10. the name to pull their name up. It's basically meta 11 A Okay. Paragraph D on page 10. 11 tag or, in a way, linking to that particular name 12 12 Q Again, you appear to be alleging there or, or the phrase or whatever it is. 13 13 that defendants create meta tags for reports which Q I don't have a clue if that was responsive 14 14 make those reports rank higher on search engines and to what I asked you but --15 15 then there's, there's some additional claims there. A I apologize. 16 16 The last sentence looks like it says Q No, it's okay. Some of this is a little 17 17 "Defendants author and use these so-called meta tags complicated. I get that. But what evidence do you 18 in violation of Google's terms of service." 18 have that Ed Magedson or Xcentric Ventures created 19 19 What is your factual basis for making that any meta tags for the specific reports at issue in 20 20 allegation? this case? Do you think that Ed Magedson sat down 21 A Google, I contacted them. 21 and typed the computer code that you're referring to 22 22 Q Did you? as meta tags? 23 23 A Yes. And --A It's not a computer code. It's very easy. Q When did you do that? 24 24 In fact, when I called Google and Yahoo, they both 25 A I believe in March of 2009. 25 said that there's no way we can take this out other 99 101

1 than Ripoff Report. 1 there beginning --2 2 A Exhibit 10? Q You're saying that Google and Yahoo 3 wouldn't agree to remove anything from their search 3 Q Exhibit 10, paragraph 22, subparagraph E. 4 engine index and that, if you wanted it to disappear 4 Beginning with the word "solicit." It's the 5 5 from there, you had to ask Ripoff Report to take it complaint which is there. 6 down and they would have to do that? 6 A It's in the complaint? 7 7 A Yes, that's right. The complaint --8 8 A I apologize. You said in the exhibit. Q But that's not quite what I asked you. I 9 9 asked you what evidence do you have that Ed Magedson Page 10? 10 personally created any meta tags at all for the 10 Q Page 10, paragraph 22, subparagraph E. 11 11 A Page 10, D? reports about your company or you in this case? How 12 12 do you know that he did that? I understand that you "E" as in "Edward." Q 13 think that he did, but I'm asking for evidence that 13 Α Go ahead. 14 supports that. 14 Q Beginning with the word "solicit," do you 15 15 see where it appears that you're alleging that A There's nobody else -- you're creating in 16 16 a conspiracy theory here. We are talking about defendants solicit individuals to submit so-called 17 specifics. He is the owner of this website. It 17 Ripoff Reports with the promise that so-called 18 18 seem to me it's a one-man show, its own operation in individuals may receive compensation in exchange for 19 19 a way, gave and take. And he's -- there's nobody their posts. 20 else is doing these things. Unless you want to say 20 Do you have any evidence that Ed Magedson 21 21 there is a conspiracy theory here. or anyone associated with Xcentric Ventures, LLC, 22 Q Well, but the author could be doing that, 22 specifically asked somebody to post anything about 23 23 couldn't they? you, AEI or Ms. Llaneras? 24 24 A Author how they can do it? A Answer to that is Ripoff Report has -- we 25 Q By inputting information --25 have a copy of that page I believe. I can provide 102 104 A Author does not have access to your 1 that to you, which it says is he --1 2 2 database information, content management system. Q What do you mean by that page? Oh, you're 3 You have the access to your content management 3 saying where it says submit a report and receive 4 4 system. compensation? 5 5 A It says submit a report, you will be Q Let me just ask you this: Is it your 6 position that Mr. Magedson using a keyboard typed in 6 interviewed by media and even you would be 7 7 any of the information in anything that you would compensated. 8 8 call a meta tag relating to the reports at issue in Q First of all, I think there's a footnote 9 this case? 9 to your own complaint that says defendants have 10 10 removed this content from their website. A Yes. 11 11 Q Do you have any evidence to support that? But it sounds to me like even if it was 12 12 still there, that's a general reference, is it not? 13 13 Q Other than your own speculation. I I mean, they're not saying submit a report about AEI 14 14 understand that you're speculating. That's fine. and --15 15 MR. BLACKERT: Objection. Mischaracterize A They're saying about everybody. 16 O Generally, yes --16 the witness's testimony. 17 17 BY MR. GINGRAS: A I'm everybody there. 18 Q Do you have witnesses or documents that 18 Q Is it your position that anything on the 19 19 Ripoff Report website ever said, if you submit a support your theory? 20 20 A There is no one can go to that website report about AEI, Raymond Mobrez or Iliana Llaneras, 21 other than Mr. Magedson. You're going universal on 21 that money would be paid to the author? Do you have 22 22 something which is he's the only person who has any proof that that's true? 23 23 A It is part of the Ripoff Report. access to his content management. 24 Q Let's look at subparagraph E of paragraph 24 0 Where? 25 25 22 in Exhibit 10. Okay? Do you see what it says We just, we just discussed that. It's in 103 105

1	our website sp	ecifically says that	1	Do you see the text quoted there, yeah, in those
2	-	AEI or in general?	2	subparagraphs? 28A through O?
3	_	body. "Come on and do it."	3	A Correct.
1	•	u would agree with me, sir, that	4	Q Beginning with, quote, "Asia Economic
		er has never been, is not now, has	5	Institute lie, cheat, tax fraud," and then there's
-		the past anything that specifically	6	other text there. Do you see that?
7		o post about AEI, you or your wife?	7	A Yes.
3		that. It's invitation	8	Q Do you believe that Ed Magedson or anybody
)	Q It says		9	associated with Xcentric Ventures, LLC, created that
)	A No.		10	text as in specifically wrote it?
		generally, doesn't it?	11	A I can't speak of that. I don't know who
		"Come on and do it."	12	wrote it.
	Q Okay.	Come on and do it.	13	Q Do you have any evidence that Ed Magedson
	A It's invi	tation	1 4	did so?
		have any evidence that the authors	15	A I can't speak of that. He may did.
		ix reports at issue in this case	16	Q He may have, but he may not have; right?
	-	ey wrote because they believed they	17	A I don't know. I don't know who did this.
		•	18	Q Okay. Turning to paragraph 30 on the next
	were going to	peak of that.	19	page, 13, paragraph 30 talks about defendants I
		•	20	assume you mean Mr. Magedson "informed you tha
	Q I know	•		
		on to page 12, please, of	21 22	they would not remove the defamatory posts even if they were false. Defendants further offered to
		eginning with the heading "The		-
		Do you see that?	23 24	enroll plaintiffs in the CAP program for a fee of at
	A Correct		25	least \$5,000 plus a monthly monitoring fee."
	Q Do you	see where it says "The Shakedown"?		When did that statement occur in paragraph
	A Correct.		1	30? When did that happen?
		what you understand the term	2	A Well, it could be on April 2009.
	"shakedown"		3	Q Okay. And we'll get to your declaration.
	A In nutsh		4	I think you're more specific, so don't worry if you
	Q Yeah.	cii.	5	don't recall right now.
	-	own to me is a nutshell. All the	6	But definitely defendants Ed Magedson or
	facts.	will to life is a nutshell. All the	7	Xcentric, I guess, offered to enroll you in the CAP
		know what that means, but I'll	8	program for \$5,000?
	accept, I'll acc	•	9	A Yes.
		one, you have to understand, maybe	10	Q Okay. And then you referred to an e-mail.
	this is a legal te	•	11	I guess we'll get to that in just one second, dated
	_	didn't write it?	12	May 12th. Did the May 12th e-mail that you received
	A Huh?	unum t Wille it.	13	from Mr. Magedson cause you to feel any fear?
		not write that term?	14	
	-	rite legal paper.	15	A Absolutely.  Q Why?
		believe, as you understand that	16	A He's saying go and enroll to this, it's a
		whatever you think it means, do you	17	pressure. He's persistent about
		hakedown occurred in this case?	18	Q Wait a minute. Hold on. Oh, that is 12.
			19	-
		quite sure what you're saying.		That's okay. I don't want to go out of order.
	_	either. I don't know what the	20	We'll get to that e-mail in a minute. I think I
	word means.	The subsection of	21	confused May 12th with Exhibit 12.
		ve on. The subsections of	22	I'm sorry, I interrupted you. You were
	paragraph 28,	there are A through O, which appear to	23	talking about why that e-mail made you feel fear.
			0 4	
		rom one or more of the reports which through 6A and B of your deposition.	24 25	A It says "You're driving me crazy, you've got to go and do this."

1 weeks from now.	1	BY MR. GINGRAS:
2 Q That's right.	2	Q Sure. Let's just use your own words,
A Okay. So we have three weeks to go.	3	okay? Okay. On page 23, beginning with paragraph
4 Q Mr. Mobrez, your complaint includes a	4	72 of Exhibit 10.
5 couple of allegations of conspiracy. Do you believe	5	A Yes.
6 that Mr. Magedson and/or Xcentric have conspired	6	Q Ignore paragraph 72. Look at paragraph
7 with somebody else to harm you?	7	73:
8 A I can't speak of that.	8	"Defendants and persons unknown to the
9 MR. BLACKERT: Objection. Calls for a	9	plaintiffs at this time have had a common
0 legal conclusion.	10	design by means of concerted action to solicit,
1 BY MR. GINGRAS:	11	develop, create and publish on defendant's
2 <b>Q</b> Are you aware of any evidence that shows	12	websites false and defamatory statements about
3 Mr. Magedson or Xcentric or anyone associated with	13	the plaintiffs."
4 Xcentric conspiring to harm you?	1 4	My question to you is I understand at the
5 MR. BLACKERT: Objection. Calls	15	time you wrote this you said the defendants and
6 BY MR. GINGRAS:	16	people who you did not know have done these bad
7 Q I'm asking about evidence that you know	17	things. As we sit here now, have you gained any
8 <b>of.</b>	18	further insight into who those unknown people are?
9 MR. BLACKERT: Objection. Calls for a	19	A You have to give me your information so I
0 legal conclusion.	20	can find out who they are.
THE WITNESS: I have to see evidence. You	21	Q And imagine our response is "I don't know.
2 have the evidence. I have to see your evidence	22	No such person. We didn't conspire with anyone."
so I can see who you were involved.	23	Assuming that's our response, which it
4 BY MR. GINGRAS:	24	will be, what evidence do you have to show anything
5 Q Well, I know what our evidence is on that	25	contrary to that? Anything?
174		1
point, which is zero, and I'm not here to testify,	1	MR. BLACKERT: Objection. Argumentative.
2 so that's meaningless to you.	2	THE WITNESS: I don't know. This is a
3 <b>But I want to know what evidence you have.</b>	3	legal question.
4 Because in theory you shouldn't bring a lawsuit with	4	BY MR. GINGRAS:
serious claims like that without evidence. Wouldn't	5	Q Oh, it's purely factual, Mr. Mobrez. What
you agree with me?	6	I'm asking you is, let's say John Brewington called
7 Move to strike that. That was	7	you up and said, "I've been conspiring with Ed
8 argumentative.	8	Magedson. He asked me to post these things about
A Let me clarify the statement you just	9	AEI, and I did that because he gave me an ice cream
0 made. When I say "to you," it means Ed Magedson or	10	cone," since we've been talking about ice cream.
Ripoff Report. I don't mean to you personally.	11	That would be a factual issue that I'd
2 <b>Q Right.</b>	12	like to know about if you have any evidence like
A So I appreciate you understand that.	13	that. If you don't have any evidence like that, I'm
4 Q But I'm talking about your conspiracy	14	also interested in that. Okay?
5 claim specifically. Conspiracy in my mind, you	15	MR. BLACKERT: Objection. Vague and
6 can't enter into a conspiracy with yourself. You're	16	ambiguous.
referring to a conspiracy with somebody else. And	17	BY MR. GINGRAS:
8 I'm asking you who is that somebody else.	18	Q As you sit here today, I understand when
9 MR. BLACKERT: Objection. Calls for a	19	you filed this complaint you did not know who these
0 legal conclusion.	20	unknown people were. As you sit here today, do you
1 THE WITNESS: (I can you be clear about)	21	know who they are?
2 your statement, or can you rephrase it and ask	22	A You are going back again to guessing game.
me any other shape and form so I can be able to	23	We I can't guess anything until you provide me
	24	all your evidence, all your information.
4 respond to it adequately?	PC 4	
respond to it adequately?	25	Q So as we sit here today, the name of this

1	unknown person you don't know?	1	A It's whatever it is. We have a track
2	A No.	2	record of it obviously.
3	Q Okay.	3	Q Okay. But AEI didn't sell any products,
4	A I can guess a million things. It's not a	4	so it's not like you built prototype widgets and
5	guessing game.	5	that cost 100,000 and then you spent money on that.
6	Q What is the total amount of damages that	6	Because of the nature of what the business
7	you're seeking in this case?	7	was, giving seminars, I guess my question is what
8	MR. BLACKERT: Objection. Calls for a	8	did you spend money on specifically to do that?
9	legal conclusion.	9	MR. BLACKERT: Objection. Asked and
10	THE WITNESS: We have not compiled all of	10	answered.
11	our numbers yet. But we have a huge loss here.	11	BY MR. GINGRAS:
12	BY MR. GINGRAS:	12	Q I don't know what money a person needs to
13	Q In a ballpark figure, what do you believe	13	spend in order to build the type of business as
14	that loss to be?	1 4	you've described AEI trying to be. I don't know
15	MR. BLACKERT: Objection. Calls for a	15	what you would spend it on. Lawyers I don't know
16	legal conclusion. Asked and answered.	16	what you would spend it on, so I'm asking you to
17	BY MR. GINGRAS:	17	help me.
18	Q Are we talking about a million dollars or	18	A You just mentioned something very
19	one dollar or something in between?	19	important. You said you will spend the time and to
20	MR. BLACKERT: Objection	20	build a gadget or midget or whatever you call it.
21	THE WITNESS: Something above a million	21	Q Widget, widget, thank you. And after you
22	dollars.	22	build that, I would just break it. What would you
23	BY MR. GINGRAS:	23	do with it after that? Why did you waste your time
24	Q A million dollars?	24	to build that?
25	A And more.	25	A Answer is all inside of that same widget.
	178		180
-			
1	Q How much money did you spend investing in		Q But in the widget example, you might be
2	the building of AEI, if you will?	2	able to point to a receipt for a machine that you
3	A That's we're going to collect that through	3	had to buy or a
4	our tax returns and other accounting informations.	4	A That's what you're going to get.
5	That you will have that in the next three weeks as	5	Q A receipt for machines?
6	you said	6	A Yeah.
7	Q You said "collect that." You're not going	7	Q And don't you still have those things?
8	to recover that money, you said you're going to	8	A We still have all the, whatever we spended
9	gather that information?	9	on AEI.
10	A Information.	10	Q But you're unable to use that in any
11	Q Right.	11	meaningful way because of the reports?
12	A And you asked for information.	12	A It's finished. It's burned the house.
13	Q Right.	13	You're saying, after we built the house, somebody
14	A You didn't ask for the money.	14	burned it and let's see how we can see if we can use
15	Q Do you have any idea as you is sit here	15	the house again.
16	now how much money you spent building AEI?	16	I can use the picture, but I can't use the
17	A I would say	17	house back again. It's been burned to the ground.
18	MR. BLACKERT: Objection. Asked and	18	Q Okay. Mr. Mobrez, I think we covered this
19	answered.	19	before, that, that you told me that your reputation
20	You can answer.	20	and your wife's reputation and your business's
21	THE WITNESS: I would say over a million	21	reputation, they've all been harmed as a result of
22	dollars.	22	these postings; right?
23	BY MR. GINGRAS:	23	A Yes.
24	Q And that would be, like, what would you	24	Q And can you quantify that loss as we sit
25	have spent that money on?	25	here today?
1	179	1	181

		_		
1	want to fix this, we can take care of this right	1	MR. BLACKERT: No, that's okay.	
2	now"?	2	THE DEPOSITION OFFICER: Do you want	· a
3	A It's that's what I'm saying. I have, I	3	•	. а
		1	copy of the transcript?	
4	believe there has to be one more phone call is	4	MR. BLACKERT: Yes, yes, yes.	
5	missing in this whole picture.	5	(Deposition session concluded at 5:12 P.M.)	
6	Q Your phone bills would show it, and they	6	-000-	
7	sure don't.	7	\\\\	
8	A Let me explain to you. Because if I	8	\\\	
9	didn't know there is exchange of money, I would have	9		
10	not said, "We have to do this differently."	10		
11	Q Mr. Mobrez, you testified under oath	11		
12	repeatedly that on May 5th Mr. Magedson asked you	12		
13	for \$5,000. Why did you ask him in the recorded	13		
14	phone call that you didn't know was being recorded	14		
15	on May 12th, why did you say to him, "I don't know	15		
16	what the cost of the program is"? Why did you say	16		
17	that?	17		
18	If Mr. Magedson asked you for money on	18		
19	May 5th, which we know he didn't, why would you ask	19		
20	him on May 12th that you don't know what the cost of	20		
21	the program is? You didn't know on May 12th because	21		
22	he never asked you; isn't that true?	22		
23	A No, I can't say that because I don't know	23		
24	what the cost is.	24		
25	MR. GINGRAS: I know you don't.	25		
	298			300
1	All right. I think I'm going to call this	1		
2	a day. I know we scheduled the deposition of	2		
3	your wife today. I'd like to go on the record	3	***	
4	as saying that I am suspending that deposition	4		
5	in light of what has happened here today.	5		
6	I want your lawyer has certain	6		
7	obligations under his duties to the State Bar	7	I do solemnly declare under penalty of perjury	
8	and to our court, and I do not want to put him	8	that the foregoing is my deposition under oath; that these	
9	in a position, assuming, as I hope, that he is	9	are the questions asked of me and my answers thereto; that I	
10	an innocent victim of your conduct and your	10	have read same and have made the necessary corrections,	
11	crimes, I do not want to put him in a position	11	additions, or changes to my answers that I deem necessary.	
12	where he will lose his license if he continues	12		
13	to represent you knowing, as he knows now, that	13	In witness thereof, I hereby subscribe my name	
14	you have committed perjury in this case.	14	this day of, 20	
15	For that reason and only that reason, I am	15	·	
16	suspending your wife's deposition. I will	16		
17	retake it at a later time if this case	17		
18	continues past today, which I certainly expect	18		
19	it will not. Okay? And I'll give your lawyer	19		
20	notice of that when and if we decide to. Okay?	20		
21	That's it. We're off the record.	21		
22	THE VIDEOGRAPHER: The time is 5:12, and	22	Witness Signature	
23	we're going off the record.	23		
24	THE DEPOSITION OFFICER: Mr. Blackert, are	24		
25	you requesting review of the transcript?	25		
2	you requesting review of the transcript:			301
1	223	1		

1	STATE OF CALIFORNIA )	
_		
	) ss.	
2	COUNTY OF LOS ANGELES )	
	)	
3		
4	I, Yaelle Daneshrad, Certified Shorthand	
5	Reporter, Certificate No. 11754, for the State of	
6	California, hereby certify:	
7	I am the deposition officer that	
	i ani the deposition officer that	
8	stenographically recorded the testimony in the	
9	foregoing matter;	
	D' 1 1 1 1	
10	Prior to being examined, the witness was	
11	by me first duly sworn;	
12	The foregoing transcript is a true record	
13	of the testimony given.	
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http://www.ripoffreport.com/employers/asia-economic-instit/asia-economic-institute-aei-ef3f4.htm

Report: #417493

## Report: Asia Economic Institute, AEI, WorldEcon

Reported By: (Los Angeles California)

Asia Economic Institute, AEI, WorldEcon: Raymond Mobrez And Iliana Llaneras Complete exploitation as an employee. Do not work for the Asia Economic Institute its a SCAM! West Los Angeles California Don't let him win.

### Asia Economic Institute, AEI, WorldEcon

Www.asiecon.org West Los Angeles California 90034 U.S.A. Phone: Web Address:

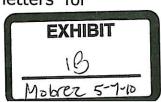
Category: Employers

**Submitted:** Wednesday, January 28, 2009 Last posting: Monday, August 17, 2009

This is a fair warning. If you or somebody you know is thinking about working or interning at the Asia Economic Institute or anything associated with the Asia Economic Institute, please read on. I have known and worked with many people from that same institute and the collective feeling is quite the same.

The Asia Economic Institute was supposedly found in 1999 by Raymond Mobrez and Iliana Llaneras, former bankers as far as I know. It is privately funded by the two who co-currently run another business that leverages their connections in the real estate industry. Asia Economic Institute has never made money and has gone back and forth as a non-profit to a for profit company many times.

The one thing they succeed at doing well is hiring vulnerable recent grads and international students to join this "firm." They have promised many previous workers work visas, reference letters for



university, and numerous raises and they have failed to deliver every time. Not only have they failed their employees on their promises, they also reduce pay illegally according to the laws of California, and fight any unemployment benefit claim that would be brought up after termination of employment. They knowingly take advantage of workers who think that these types of things are common practice. Most of my previous co-workers term it as an "internet sweatshop."

The irony of it all is that once you start working, nothing ever gets done. On one hand they want as many workers as possible, but on the other, given the complete disorganization and no plan to make money, nothing ever moves forward.

There are a couple of theories that could explain this paradox. One is that they are laundering money and writing off the Asia Economic institute as a loss to prop up their other real estate business. Logically, it would fit that they would keep hiring people to show they are trying to keep the business alive. Another reason, which I believe as equally as any other, is that they have no idea to run any business and just continue to ruin people's lives in the process.

Furthermore, the credentials of Raymond Mobrez, Director of the Institute, and Iliana Llaneras, are as muddled as they can possibly be. He claims to be a Ph.D. in Human Resources or something of the other to increase his ability to reel you in during an interview. The truth is that there are no credentials to back up the scheme that they are running.

Please stay away from this place.

Ray Los Angeles, California

U.S.A.

#### **REBUTTALS & REPLIES:**

1Author1Consumer5Employee Undates & Rebuttals:

#1

Consumer Comment

Respond to this report! 3

I would like to know more about this company

Chief - Los Angeles (U.S.A.)

SUBMITTED: Wednesday, February 04, 2009POSTED: Thursday, February 05, 2009

Can you shed more light on Raymond?

#2

Ex-Employee

Respond to this report! 3

Completely Agreed

Bbx - Terrance (U.S.A.)

SUBMITTED: Friday, February 20, 2009POSTED: Friday, February 20, 2009

I used to work for this "company" and I have to completely agree with everything you said. Mobrez and Llaneras deserve serious legal punishment for ruining my life the same way you explained.

Where is justice when you need it?

#3

Ex-Employee

Respond to this report! ?

Also...

Bbx - Los Angeles (U.S.A.)

SUBMITTED: Friday, February 20, 2009POSTED: Friday, February 20, 2009

Check this out:

http://www.ripoffreport.com/reports/0/423/RipOff0423987.htm

Another person who feels just like we do about Asia Econ.

#4

Ex-Employee

Respond to this report! 3

Shed more light on Raymond Mobrez??

Charles - Los Angeles (U.S.A.)

SUBMITTED: Wednesday, March 04, 2009POSTED: Thursday, March 05, 2009

Nah--for the same reason we keep our sewage in underground septic tanks, rather than letting it bask in the sunlight. Unless you're a psychologist or documentary filmmaker, I wouldn't waste your time with unscrupulous, mendacious, buffoonish cretins. #5

Ex-Employee

Respond to this report! 7

Your Report is Spot On -- Raymond and Iliana are Grade A Jerks The Instigator - North Hollywood (U.S.A.)

SUBMITTED: Thursday, March 26, 2009POSTED: Thursday, March 26, 2009

I completely agree with your report. It perfectly describes the modus operandi of Raymond Mobrez and Iliana Llaneras. As you noted, they routinely igmore employment laws, and treat their employees like dirt. Since Raymond is a member of the Mortgage Bankers Association, that organization should be notified of the shady business practices in which he and Iliana engage.

#6

Owner of Company

Respond to this report! ?

Asia Economic Institute is saddened by the false allegations posted on this "RipOff "Internet gossip site

Asia Economic Institute - Los Angeles (U.S.A.)

SUBMITTED: Friday, April 03, 2009POSTED: Friday, April 03, 2009

The Asia Economic Institute is distressed and profoundly saddened by the false allegations posted on this "RipOff "Internet gossip site. Particularly as they may reflect on the many fine people who have worked with and for us over the years, including the Directors, Raymond Mobrez and Iliana Llaneras and the numerous respected and trusted public servants in the international banking system who count us as friends and associates, and the various Government institutions that rely on our integrity. We know that the truth will come out and are confident that appropriate remedies will be found by our attorneys. If you have been similarly injured by this site, we would like to hear from you. Please email us at Legal@AsiaEcon.org or call us at (310) 806-3000.

#7

Ex-Employee

Respond to this report! 0

well put, Ray

Humblevictim - Los Angeles (U.S.A.)

SUBMITTED: Monday, June 01, 2009POSTED: Monday, June 01, 2009

This is an accurate portrayal of Raymond and Iliana Mobrez.

Do not work for them. They are terrible human beings.

#### #8

### Respond to this report! 3

Don't let him win.

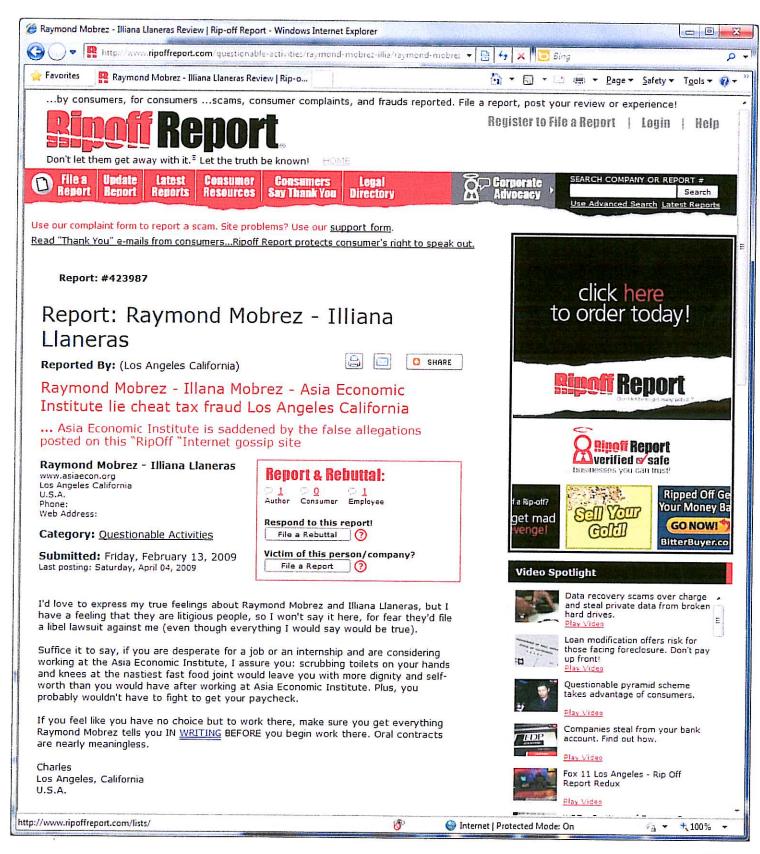
Buttalhurts - Los Angeles (USA)

SUBMITTED: Monday, August 17, 2009POSTED: Monday, August 17, 2009

Everyone who has been ripped off by this son of a bitch, fill out this forum, I am willing and already started filing a suit against this scumbag, I had contact with the BBB (Better Business Bureau) and will be forwarding every name I have in my list to make sure this bastard pays.

http://spreadsheets.google.com/viewform?hl=en&formkey=dE1YMmg1RXRqYUF0SmhBenVYanE1NXc6MA

fill it out, ill send you a email, give you updates towards what has been completed so far.





http://www.ripoffreport.com/questionable-activities/raymond-mobrez-illia/raymond-mobrez-illana-mobrez-2m9xm.htm

Report: #423987

Report: Raymond Mobrez - Illiana Llaneras

Reported By: (Los Angeles California)

Raymond Mobrez - Illana Mobrez - Asia Economic Institute lie cheat tax fraud Los Angeles California ... Asia Economic Institute is saddened by the false allegations posted on this "RipOff "Internet gossip site

#### Raymond Mobrez - Illiana Llaneras

www.asiaecon.org Los Angeles California U.S.A. Phone: Web Address:

Category: Questionable Activities

**Submitted:** Friday, February 13, 2009 Last posting: Saturday, April 04, 2009

I'd love to express my true feelings about Raymond Mobrez and Illiana Llaneras, but I have a feeling that they are litigious people, so I won't say it here, for fear they'd file a libel lawsuit against me (even though everything I would say would be true).

Suffice it to say, if you are desperate for a job or an internship and are considering working at the Asia Economic Institute, I assure you: scrubbing toilets on your hands and knees at the nastiest fast food joint would leave you with more dignity and self-worth than you would have after working at Asia Economic Institute. Plus, you probably wouldn't have to fight to get your paycheck.

If you feel like you have no choice but to work there, make sure you get everything Raymond Mobrez tells you IN WRITING BEFORE you begin work there. Oral contracts are nearly meaningless.

Charles Los Angeles, California U.S.A.



## **Updates & Rebuttals:**

#1

Ex-Employee Respond to this report! 7

#### **Agreed**

#### Bbx - Terrance (U.S.A.)

SUBMITTED: Friday, February 20, 2009 POSTED: Friday, February 20, 2009

Charles, I want you to know you're not alone. I agree with you 100% on everything you said about Mobrez and Ilaneras. Also, I found another post on this website from another person just like us. Check it out:

http://www.ripoffreport.com/reports/0/417/ripoff0417493.htm

I hope Raymond finally gets a taste of his own medicine through legal justice one day.

#2

Owner of Company Respond to this report! 7

#### What's This?

Asia Economic Institute is saddened by the false allegations posted on this "RipOff "Internet gossip site

Asia Economic Institute - Los Angeles (U.S.A.)

SUBMITTED: Saturday, April 04, 2009 POSTED: Saturday, April 04, 2009

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5-7-10

http://www.ripoffreport.com/employers/asia-economic-instit/asia-economic-institute-wor-d642c.htm

Report: #457433

## Report: Asia Economic Institute - WorldEcon -AsiaEcon - Raymond Mobrez Raymond Mobarez, Iliana Llaneres

Reported By: (Los Angeles California)

Asia Economic Institute - WorldEcon - AsiaEcon - Raymond Mobrez - Raymond Mobarez - Iliana Llaneres Unethical Practices, Employee Manipulation, Employee Rights Violation, Exploitation Los Angeles California 100% the truth

## Asia Economic Institute - WorldEcon - AsiaEcon - Raymond Mobrez Raymond Mobarez, Iliana Llaneres

www.asiaecon.org Los Angeles California 90025 U.S.A. Phone: 310-8063000

Web Address:

Category: Employers

**Submitted:** Monday, June 01, 2009 Last posting: Monday, July 20, 2009

I was an employee of the Asia Economic Institute and a victim of their unethical, often illegal practices. Some of the practices are simply assennine, rather than illegal.

Here are a few of the practices which you can expect if you "work" for the Asia Economic Institute.

1. Underpaying for time worked - Raymond "refuses" to pay over-time, and yet expects his employees to arrive early and stay late. This is expected in a salary situation, however it is ILLEGAL in an hourly wage situation. If you show up for work 15 minutes late, they will dock your pay .25 hours. However, if you work late, do not expect overtime. This is illegal. It will happen to you if you work for them.



- 2. Deducting state taxes, but not paying the state I was kept off of the <u>payroll</u> for as long as possible so Iliana could avoid paying out State Taxes. These, however, were deducted from my paycheck each pay period. At the end of the year, I owed the State extra money which had already been deducted & never payed to the state or me. They will cut every corner possible to not pay you.
- 3. Raymond promises pay increases verbally, but refuses to act on them. This is perhaps one of the worst things that can happen to a young recent grad. You are working hard, told you have value, promised a raise, and then an excuse is made.

The same thing happened when some employees were promised health insurance. The promise was not kept and excuses were made.

4. If you are hired, Raymond or Iliana may fire you for no apparent reason within 1 to 5 days. I saw this happen to <u>accounting</u>assistants, as well as content producers. Ask anyone who manages to stick around for a few months and they will back me up. Do not stop looking for work just because Raymond gave you an offer. He always offers everyone a job. He just doesn't keep you around.

After all this, I'd like to air more dirty laundry, because it makes me feel better after all the abuse I suffered at the hand of these robbers & cowards that run the Asia Economic Institute. I have no evidence as to the truth of any of these accusations except my own memory of conversations with Raymond, other employees, and my own perception of their actions.

Allegation #1 - Raymond explained to me that he hires & fires based on race, religion, gender, etc. Raymond told me girls are good for administrative tasks, especially Filipinas, because they do what they are told. Raymond told me not to trust Persians and Muslims. He told me the "blacks" only want to work in entertainment so you should not hire them. This is offensive and illegal. Obviously.

Allegation #2 - Raymond and Iliana are secretly married, but hide this fact very poorly. If you work there for a while and are trying to understand the nature of their relationship, it explains everything except for WHY they hide the nature of the relationship. Trust me, it makes no sense.

Allegation #3 - Iliana and Raymond \*MAY\* be using the Asia Economic Institute to funnel money out of Iliana's successful structured

finance <u>business</u>, into Asia Economic Institute with the purpose to avoid paying taxes. I have no evidence of this, but after working there, you begin to wonder why the company exists in the first place.

Allegation #4 - Iliana and Raymond \*ARE\* absolutely batsh\*\* crazy. They live in a strange fantasy land in which they are normal, decent people. This could not be further from the truth. Working together, running their business together, living together, the two have become so delusional they think its OK to abuse employees. Furthermore, they are germophobes who spend more time worrying about hand sanitization than managing their little project.

Please keep in mind that this is only one opinion. Many other opinions can be found by searching for Asia Economic Institute on this site if you would like other opinions.

Humblevictim Los Angeles, California U.S.A.

## **Updates & Rebuttals:**

#### #1

Ex-Employee

### Respond to this report! 3

100% the truth

Ex Aei Employee - Santa Barbara (U.S.A.)

SUBMITTED: Monday, July 20, 2009POSTED: Monday, August 17, 2009

I back you up , they are indeed crazy as hell or evil as hell or both. I worked there for a while , and the day i stopped working there was one of the best days of my life. I hope they both end up in jail, or worse.

#### #2

### Respond to this report! 7

Raymond isnt going to sucker me!

Buttalhurts - Los Angeles (USA)

SUBMITTED: Monday, August 17, 2009POSTED: Monday, August 17, 2009

Everyone who has been ripped off by this son of a bitch, fill out this forum, I am willing and already started filing a suit against this scumbag, I had contact with the BBB (Better Business Bureau) and will

be forwarding every name I have in my list to make sure this bastard pays.

http://spreadsheets.google.com/viewform?hl=en&formkey=dE1YMmg1RXRqYUF0SmhBenVYanE1NXc6MA

fill it out, ill send you a email, give you updates towards what has been completed so far.



http://www.ripoffreport.com/financial-services/asia-economic-instit/asia-economic-institute-aei-6e24c.htm

Report: #502429

# Report: Asia Economic Institute, AEI, WorldEcon

Reported By: jmgrip3 ()

USA

Asia Economic Institute, AEI, WorldEcon Asia Economic Institute, AEI, WorldEcon Potential Internship - Don't do it! I was swayed by this website Los Angeles, California Your gut feeling was correct.

### Asia Economic Institute, AEI, WorldEcon

West LA Los Angeles California United States of America Phone: Web Address:

Category: Financial Services

Submitted: Wednesday, September 30, 2009

Last posting: Friday, October 09, 2009

I was considering starting a position at this company after having an interview with Raymond. I was put off when I spoke to him previously on the phone and he didn't give his last name or his company name. I had an in-person interview today and found out his last name. During the interview I had a gut feeling that he was operating a very shady business, and the fact that I disagreed with the majority of his viewpoints on the real estate market did not help. I then came home and googled his name, and found all these bad reports. He told me to come into the office tomorrow at 11am to start work, but as a result of these reports I am going to blow him off. I am looking for work, but am not that desperate to get involved in a shady situation that will ultimately lead to disaster. I know it is hard to find a position in today's market, but this should not stand. In today's internet world, Raymond's tactics will not work!!!! Everyone knows that you can't escape your reputation, and the likelihood that all these strangers with nothing in common would jointly agree that he is a lunatic without ever knowing one another is minuscule.

Raymond, get a life, stop taking advantage of people.



#### **REBUTTALS & REPLIES:**

1Author1Consumer0Employee
Updates & Rebuttals:
#1

Consumer Comment

Respond to this report! 3

Your gut feeling was correct.

bigdaddycooool - Wickliffe (USA)

SUBMITTED: Friday, October 09, 2009POSTED: Friday, October 09, 2009

These people are EXCELLENT talkers! Yes, don't get me wrong, I do mean that in a POSITIVE manner. When my colleague and I interviewed with the company Raymond would start talking about his career highlights, travels, Asia Connections, etc. and that of Iliana's and it did indeed sound impressive, but quite BORING. We think it was his soft feminine voice with a hint of an accent that lost us within the first 6 minutes. We were dying to get out of there so that we could be put out of our misery. Had we known he had a passive and soft, feminine voice, we would have gotten a few drinks before the interview so that our senses would be dulled and the boredom would not be so intense.

The most entertaining part of the whole interview process was when Iliana would interrupt Raymond and interject additional information. She wanted to impress us and to sound intelligent at the same time but it was a real turn-off. She presented herself not to be intelligent, but a complete idiotic fool, a buffoon if you may. But in her defense, when she did interjected, what she contributed to the conversation was utterly ridiculous and it did make us laugh inside (at her and at Raymond too as he just sat there probably thinking how can I stiffle her).

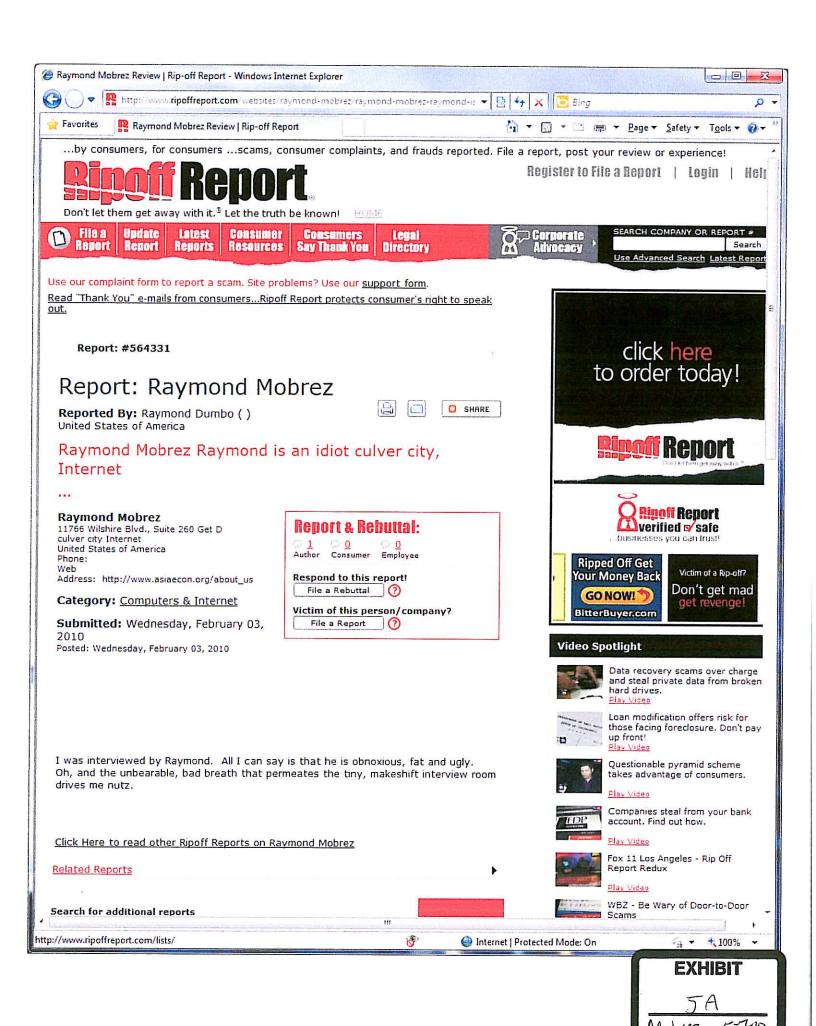
Raymond and Iliana do make the PERFECT co-worker team in this company. He seems passive and she seems aggressive; he has a passive voice and she has a strong voice; he seems to be smart (but not that much smarter than her, don't let the Dr. title fool you) and she seems to be not as smart; you get the picture.

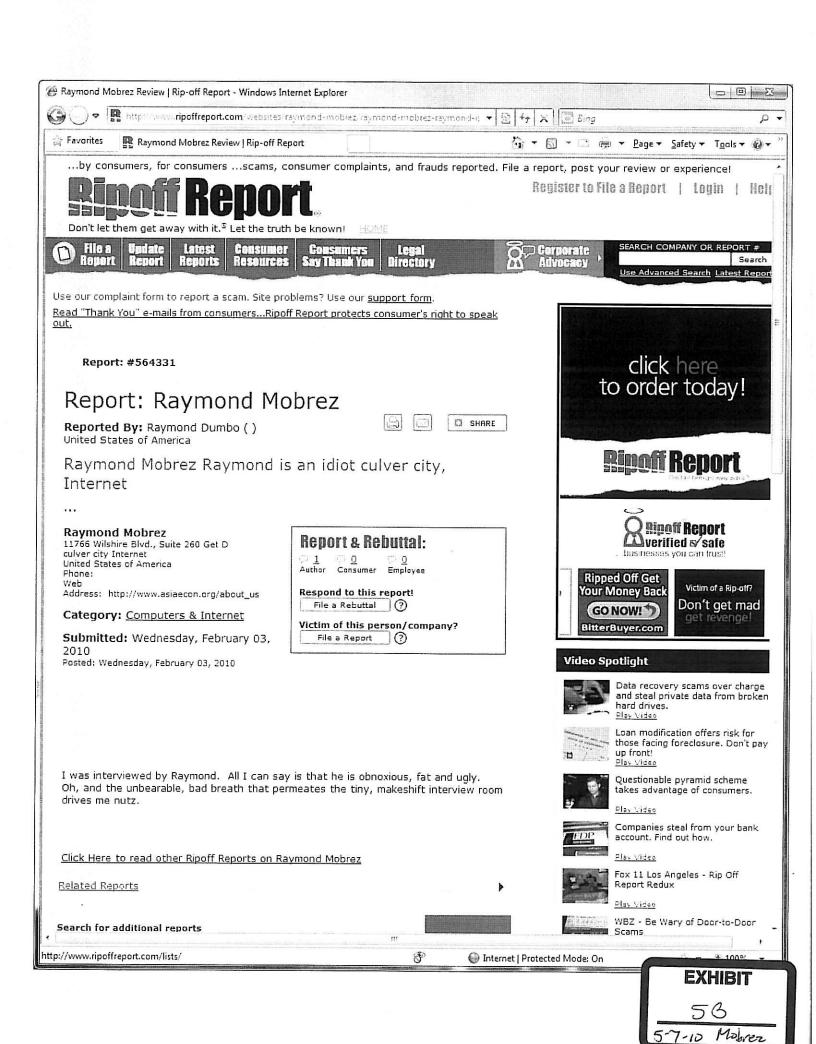
In reality they are not that bad. They are just trying to survive in this recessionary world like everyone of us. If they are trying to rip-off employees, vendors, etc. as one of the remarks seem to point then Capitalism is still alive; however, what comes around goes around.

I am not sure what their business operations are but they can't be doing too bad as they are in a nice building in a nice neighborhood. If they are losing money then they must be doing something horribly wrong or they are unaware of what each other is doing. It would be ironic if one of them was pulling the wool over the others eyes. This way we can test our hypothesis to see which is the clever of the two to get away with it. Wouldn't it also be ironic if Dr. Raymond was not the clever one of the two; i.e., he is a PhD of some sort.

Ok, I am becoming just as BORING as Dr. Raymond and I appologize for that.

If anyone has interviewed with them, worked for them, or is owed any money from them, please post it here so we can have a discussion about these two wonderful human beings, Raymond Mobarez and Iliana Llaneras.







EXHIBIT

6 A

Mobrer 5-1-10

http://www.ripoffreport.com/internet/raymond-mobarz-asia/raymond-mobarz-asia-economic-b4a5b.htm

Report: #571232

# Report: Raymond Mobarz, Asia Economic Institute

Reported By: Too Nice (New York New York)

United States of America

Raymond Mobarz, Asia Economic Institute Interviewed me for a job that was already filled, called me the next day with an opportunity Los Angeles, California

Raymond Mobarz, Asia Economic Institute

11766 Wilshire Blvd Suite 260 Los Angeles California 90025 United States of America Phone: 301-801-5161

Web Address:

Category: Computers & Internet

Submitted: Thursday, February 18, 2010

Posted: Friday, February 19, 2010

Raymond is a charming man. I could learn a lot from this guy, I thought, because he was very smart and I felt lucky that he seemed to like me. He said more than once that it was destiny that brought me to his office, because he had a great opportunity for me. He reminded me of my second husband, a brilliant psycopathic con man, and just like before I felt strangely drawn to him.

After the first interview Raymond bombarded me with <a href="emails">emails</a> with links to websites and articles that I should read. The position I first applied for was legal researching and writing and he was offering 16 per hour which was decent. I am licensed, but have been out of work for awhile and Raymond said I could leap over the break in my work <a href="mailto:history">history</a> by getting involved in internet law. I stopped working on the freelance brief I was writing for someone else and got engrossed in the multiple links he sent me. It would be a hard subject to master, but I am ready to start earning and I got excited about the money I would make.

The con-man connection occured to me at the time, but I didn't put it all together until after he called me the next day. He wanted me to pop over again for another interview because it was something he could not discuss on the phone. He talked in generalities about "opportunities" he had for me to get involved in, but I said I was flat broke and couldn't afford any "opportunities". He told me to forget about the appointment then, and he would think further about how he could help me.



In the middle of this conversation it occurred to me that I didn't know Raymond's last name and I asked him for it. I jokingly asked him what I would find when I googled him. It was an appropriate question since we had been discussing internet law and the ways that you can use the <u>internet</u> to smear someone or build them up, and the appropriate answer would have been to praise me for my dilligence, but his reaction spoke volumes. "What do you mean," he asked suspciously. Red flag. I googled him immediately after I hung up and found this site. Well, well.

There were warning signs of <u>course</u>. The fact that we were talking about internet issues and his own website did not have any active links and looked like it was built in an hour. The practically empty suite of offices with his tiny office right by the door. Also Raymond was way too complimentary about me and my accomplishments which is exactly what con men do. MY <u>web site</u> is basic, and I know it, but he made it sound like I had a career in writing code. He never read my blog, but he complimented me on how creative a writer I was. When I left his office I was on cloud nine. Please let this be real, I said to myself, but that in itself was a bad sign. When something seems too good to be true, and you have to lift your eyes upward and beg for it to be real, you can bet that it isn't.

Another flag was the lack of talk about personal things. I spoke about my son and myself, but Raymond made no mention of a wife or family or where he lived. When I asked him where his accent was from, he admitted to being Persian, but seemed angry and said that he had lived mostly in Europe. Con men have a deep self-loathing and like to blur their true identities. Some, like my ex-husband create completely different identities and life stories. They also don't discuss family because want you to think of them as alone and available which is a way to get vulnerable single women to follow them. When you see a man with no family pictures around your radar should go up.

People ask me why I don't hate my ex-husband, but Raymond is small potatoes next to him and I am grateful for all that he taught me. Having learned from the best, I couldn't go to long without spotting the red flags that Raymond puts up. Of course I should have googled him sooner and saved myself the trip over there, but it was only a 16 dollar an hour job and I can't be too hard on myself. Google is a great tool, and lack of <u>internet presence</u> is another red flag. Raymond has none, of course, except for this site.