EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

HERMAN & RUSSO, P.C.;
MELISSA A. HERMAN;
DAVID A. RUSSO,

      Plaintiffs,

      v.

XCENTRIC VENTURES, LLC, and
EDWARD MAGEDSON, and JOHN
OR JANE DOE,

      Defendants.

Case No: 10-CV-0398-CAP

DECLARATION OF JUSTIN CROSSMAN

I, JUSTIN CROSSMAN hereby declare as follows:

1.   My name is Justin Crossman. I am a resident of the State of Arizona, am over the age of 18 years, and if called to testify in court I could and would truthfully testify to the following information based upon my own personal knowledge.

2.   As an independent contractor I provide computer information technology services to Xcentric Ventures, LLC relating to the operation of the Ripoff Report website. I have provided such services to Xcentric and the previous operator of the Ripoff Report for over two years. As part of the services I provide to the Ripoff Report site, I am extremely familiar with the technical aspects of the

site's operations including the manner in which reports, rebuttals, updates, and similar submissions to the site are created. I am also extremely familiar with the meta tags, HTML, and other coding used on the site.

3.   I understand that as part of their papers filed in response to a Motion for Summary Judgment filed in this matter, the Plaintiffs have made the following assertion of fact:

> 32.   Separate from the title of the report, Defendants create the title tag for the webpage containing the report based on the following template: "Ripoff Report: [Name of Company or Individual the report is about][Brief description of what they did][City][State]".

4.   This statement is incorrect and highly misleading insofar as it suggests that Defendants have any involvement in the creation of the original content *within* "title tag" as that term is used in the example above. This is not true.

5.   As with any website, it is true that Defendant Xcentric's webservers automatically create various HTML code in order to format and display content submitted to the site by third parties. As such, it is technically accurate to say that in a generic sense, the code for reports, including the "meta tags", "title tags" and

"description meta tags", is "created" by Xcentric because Xcentric's server does in fact create this code.   However, the <u>actual original content</u> within the code, including the original content within every "title tag" (as that term is used in Plaintiffs' example above) on the Ripoff Report website is "created" entirely and exclusive by the authors who submits reports to the Ripoff Report site.
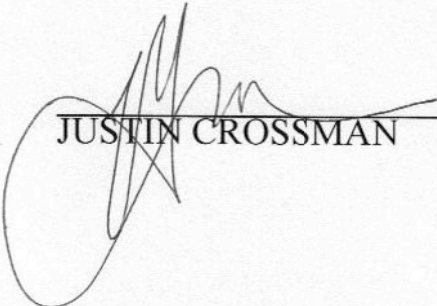
6.   As for the "title tag" example given by Plaintiffs, it is not true nor is it accurate to say that Defendant Xcentric created all of the following:

> <title>Ripoff Report: Herman And Russo, Mellissa A. Herman And David Herman And Russo, Mellissa A. Herman and David A. Russo Incompetent Legal Services at Best – Blatant Legal Malpractice Woodstock Georgia</title>

In this example, the generic HTML code shown in gray "<u><title></u>" and "<u></title></u>" was created by Xcentric. In addition, the words shown in gray "<u>Ripoff Report:</u>" were created by Xcentric. This code is highly generic and it appears on all 600,000+ pages on the Ripoff Report site. However, none of the *original* text in this example was created by Defendants. All of this material was created entirely by the author of the report, not by Defendants. This is true as to all HTML codes on the site including the "title meta tag" and the "description meta tag".

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 the 4th day of October 2010 in Phoenix, Arizona.

JUSTIN CROSSMAN

4