

1 DANIEL F. BLACKERT, ESQ., CSB No. 255021

2 LISA J. BORODKIN, ESQ. CSB No. 196412

3 **Asia Economic Institute LLC**

4 11766 Wilshire Blvd., Suite 260

5 Los Angeles, CA 90025

6 Telephone (310) 806-3000

7 Facsimile (310) 826-4448

8 Daniel@asiaecon.org

9 Blackertesq@yahoo.com

10 lisa@asiaecon.org

11 lisa\_borodkin@post.harvard.edu

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 RIP OFF 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

**DECLARATION OF RAYMOND  
MOBREZ**

1 I, Raymond Mobrez, declare under penalty of perjury as follows:

2 1. My name is Raymond Mobrez and I am a plaintiff in this action. I am  
3  
4 a resident of the State of California, and am over the age of 18, and if called to  
5 testify in court or other proceeding I could and would give the following testimony  
6  
7 which is based on my own personal knowledge unless otherwise stated.

8 2. I make this declaration in opposition to Defendants' Motion for  
9  
10 Summary Judgment.

11 3. I have been a licensed real estate broker since January 1995 and a  
12  
13 Business and Commercial Real Estate Consultant for the past 25 years. In addition  
14 to Asia Economic Institute as a project, the majority of my income was from real  
15 estate and business transactions for the past 15 years. My income comes from  
16  
17 commissions received on business and commercial real estate transactions, where I  
18 assist clients to acquire or sell commercial real estate properties. I also consult on  
19  
20 Commercial Real Estate Finance assisting borrowers on their financing  
21 procurement, where I identify specific lenders to provide loans for the borrower's  
22  
23 specific property and I am involved throughout the processing of the loan until it  
24 closes.

25 4. My income comes from commissions paid by clients on services that I  
26  
27 provide for them on commercial real estate properties. The amount ranges  
28 depending on what services I provide. Such as, if I provide services to a client to

1 procure a purchase or sale transaction as a broker, the commission earned ranges  
2 from 2% to 6% of the total amount of the sale or purchase, depending on the size,  
3 nature and complexity of the transaction. In a finance transaction, the commission  
4 is 1% of the total loan amount provided. The client pays my commission when the  
5 transaction closes.  
6  
7

8 5. Although in prior years I was able to generate revenue, clients no  
9 longer wanted to work with me after the negative postings were reflected on  
10 Google and other search engines when they searched my name or company online.  
11

12 6. In particular, I was working on specific transactions during 2008 and  
13 2009 that suddenly halted due to the investors and their agents seeing negative  
14 postings about me reflected on Google and other search engine results when they  
15 did an online search on my name and company.  
16  
17

18 7. I specifically lost commissions on the following transactions that I  
19 was working on during 2008 and 2009 as a result of the negative posting online:  
20

21 A) Marriott Hotel Purchase Price \$85 million – Commissions lost of 1%  
22 (\$850,000).  
23

24 B) Angleno Hotel – Purchase Price \$35 million – Commissions lost of 1%  
25 (\$350,000).  
26

27 8. Prior to the negative statements posted on online, I used to get  
28 numerous calls from various existing and new business contacts regarding business

1 ventures and transactions. However, since the postings, I do not receive any more  
2 business opportunities or return calls. It is like the light bulb turned off.  
3

4 9. I learned of this trend while attending a conference in Asia in 2009. A  
5 new business contact was very interested to work together on some business  
6 projects. However, he stepped away for a few minutes to apparently do an online  
7 search on me and when he came back he told me there is negative information  
8 about me on the internet and that it would be difficult for anyone to work with me  
9 since my reputation would be in question and no one would trust me in any  
10 business transactions. He suggested that I get an Attorney right away regarding  
11 this matter. He never contacted me after that communication.  
12  
13  
14

15 10. Since that timeframe to date, I continue on a daily basis every day to  
16 contact people for new business, but they no longer return my calls or emails.  
17

18 11. I attend many business conferences to try to generate income on  
19 business transactions and I meet and connect with many business contacts. They  
20 are initially eager and interested to do business with me, however, after I give them  
21 a business card, I never hear back from them, even if they were very interested in  
22 working together.  
23  
24

25 12. My personal and business life has been devastated/destroyed and  
26 dramatically impacted as a direct result of these negative postings reflected on  
27  
28

1 Google and other search engines when someone searches my name or company  
2 online.  
3

4 13. People mistrust me after they view the online negative statements and  
5 presume I have done something wrong. They formulate an opinion even before  
6 they further discuss or do business with me and automatically disregard my over  
7 25 year spotless reputation in business.  
8

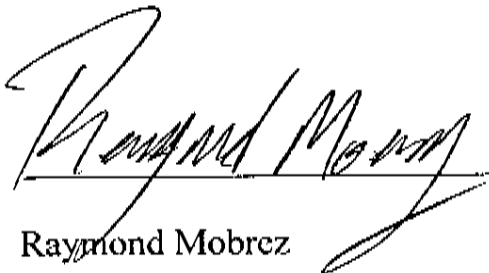
9 14. I even have trouble hiring new employecs. During the in-person or  
10 phone interview, they seem eager, serious and committed to start work. But then,  
11 they do not follow up or never show up for work. This has continuously happened  
12 since the negative postings have been reflected online in the Google and other  
13 search engines.  
14  
15

16 15. These online postings have interfered with my business and livelihood  
17 and continue to damage me from generating income.  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**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 ON: October 1, 2010

  
Raymond Mobrez