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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, )

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

**DECLARATION OF ILIANA LLANERAS**

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; EDWARD )  
MAGEDSON an individual, and DOES )  
1 through 100, inclusive, )

Defendants.

Asia Economic Institute et al v Xcentric Ventures LLC et al

Doc. 161

1 I, Iliana Llaneras, declare under penalty of perjury as follows:

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3 1. My name is Iliana Llaneras and I am a plaintiff in this action. I am a  
4 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 am a licensed real estate broker. A significant amount of my  
12 business income comes from commissions received on real estate transactions  
13 where I assist owners of real estate in obtaining financing for their real estate  
14 properties. I am involved in the finance process from the initial time of locating a  
15 specific lender to approve the loan until the loan closes, at which time I am paid a  
16  
17 commission by the owner of the real estate property for my services provided. The  
18  
19 commission amount paid to me is 1% of the total loan amount obtained for the  
20  
21 owner.

22 4. My income from Commercial Real Estate Finance Transactions prior  
23 to the negative postings ranged from approx. \$250,000 to \$750,000 per year. Such  
24 as, in 2004, the income was \$253,858; in 2005, the income was \$839,250; in 2006,  
25 the income was \$360,715; in 2007, the income was \$286,000.  
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1           5.     In late 2007 and early 2008, I focused my time on Asia Economic  
2 Institute to help launch the seminar and conference business that was going to be a  
3 new source of revenue. In mid-2008, I again focused my time back to primarily my  
4 finance business. I was receiving new loan requests from new clients and I was  
5 working with lenders that were actively lending in the market. Therefore, I had a  
6 flow of business coming in as previously. However, oddly enough, none of the  
7 transactions were closing. A pattern quickly developed where I would receive a  
8 new loan request and shortly thereafter, I would not hear back from the client. It  
9 was as if everything suddenly stopped. As a result, I did not make any income in  
10 2008 and 2009 and currently to date in 2010.

15           6.     In summary, after the negative postings, I have not been able to  
16 generate any income even though I try every day and work almost 12 hours a day  
17 including weekends. I continue my efforts to generate income and I am either  
18 working around the clock on Finance transactions or attending business  
19 conferences trying to generate more business. All apparently, to no avail. Even  
20 during the past two years which was the worst financial markets in history, I was  
21 working with financial institutions that were still lending in the market where other  
22 lenders were on the sidelines; and I was receiving 3 to 5 loan requests per week  
23 from clients wanting to borrow. So, I was constantly receiving new business and  
24 had the ability to generate income, compared to other similar professionals in the  
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1 Finance sector. However, based on an unusual pattern that continued to lurk  
2 around me for the past year or two, I noticed it has prevented me from closing any  
3 transactions.  
4

5 7. I continue to be involved in new Finance transactions with new  
6 clients eager to obtain their financing. However, shortly after I begin the review  
7 process on a transaction, the client stops all communications with me both calls  
8 and emails. It is like a sudden emergency brake is placed and they refuse to do  
9 business with me, even though they are eager to obtain the loan being offered. This  
10 has happened several times and I have noticed a distinctive pattern repeating itself  
11 when comparing the business flow and closings now and prior to the negative  
12 postings were reflected.  
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16 8. As a result of these negative postings, I have lost enormous  
17 commissions on many transactions that would have closed and business owners  
18 that I could have helped. A few that come to mind immediately, which I found odd  
19 for them to stop communications since they were so eager for me to expedite the  
20 loan closings are the following transactions, in which I had constant daily  
21 interactions with the clients in processing their loan requests and they suddenly  
22 stopped without a word.  
23  
24  
25

26 A). Fitness and Retail Center – Refinance of \$10,000 – Commission Loss of 1%  
27 (\$100,000)  
28

1 B). Medical Office Building – \$25 million development project:

2 - Construction Loan of \$18 million – Commission Loss of 1% (\$180,000);

3  
4 - Permanent Long Term Loan of \$22 million – Commission Loss of 1%  
5 (\$220,000).  
6

7 9. All I know is that I had numerous clients wanting to do business with  
8 me and the minute they read the negative untrue comments online, they never  
9 called me again. The statements taint my reputation and cause speculation and  
10 caution those initially eager to work with me. This character assassination is the  
11 first thing people read when searching online.  
12

13  
14 10. I have also not been able to recruit the necessary persons to work for  
15 me. This is a severe hardship on my business and on me personally.  
16

17 11. I would always receive calls back when I left a message or sent an  
18 email to new clients. However, now when I provide my complete name or  
19 company, I never receive returned calls or emails. I have noticed this pattern  
20 occurring more widely within the past year. Even when I attend conferences and  
21 hand out my business cards to people who tell me they want to refer business to  
22 me, I never receive further communications from them. It has happened so often  
23 that I am reluctant to hand out cards anymore and I do not provide my complete  
24 name or company when I leave messages. If I do, I never receive responses. This  
25 attack being inflicted on me and my business has created an enormous hardship.  
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1 Pursuant to 28 U.S.C., Section 1746, I declare under penalty of perjury under  
2 the laws of the United States of America that the foregoing is true and correct.  
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5 EXECUTED ON: October 1, 2010

6 A handwritten signature in black ink, appearing to read "Iliana Llaneras", written over a horizontal line.

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8 Iliana Llaneras  
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