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7 Attorney for Plaintiffs,
Asia Economic Institute,
8 Raymond Mobrez, and
Iliana Llaneras
9

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 ASIA ECONOMIC INSTITUTE, a California)
LLC; RAYMOND MOBREZ an individual;)
13 and ILIANA LLANERAS, an individual,)

14 Plaintiffs,)

15 vs.)

16 XCENTRIC VENTURES, LLC, an Arizona)
LLC, d/b/a as BADBUSINESS BUREAU)
17 and/or RIP OFF REPORT and/or)
18 RIPOFFREPORT.COM; BAD BUSINESS)
19 BUREAU, LLC, organized and existing under)
the laws of St. Kitts/Nevis, West Indies;)
20 EDWARD MAGEDSON an individual, and)
DOES 1 through 100, inclusive,)

21 Defendants.)
22)
23)
24)
25)
26)
27)
28)

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

**DECLARATION OF ILIANA LLANERAS
PURSUANT TO THE COURT'S ORDER
ON APRIL 19, 2010 REGARDING
PLAINTIFFS' RICO AND EXTORTION
CAUSES OF ACTION**

Judge: Stephen V. Wilson
Trial Date: August 3, 2010
Time: 9:00 AM
Courtroom: 6

Asia Economic Institute BADBUSINESSBUREAU.COM

Doc. 27

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

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

7 2. I am a principal of Asia Economic Institute ("AEI"). AEI had been in business in
8 California for the past nine years. At the time the defamatory posts were posted on Ripoff
9 Report, AEI operated as a free on-line, non-governmental publication of current news and
10 events.
11

12 3. In early or mid-February of 2009, I and Mr. Mobrez conducted a search on
13 Google.com ("Google") and/or Yahoo.com ("Yahoo") using the following terms: Raymond
14 Mobrez, Mobrez, Iliana Llaneras, Llaneras, and AEI. Within the first few search results, our
15 names appeared in association with a "Ripoff Report." The resulting text also claimed that we
16 had exploited our employees and warned search engine users not to work for AEI.
17

18 4. I have never spoken with Ed Magedson. However, I witnessed the conversations
19 that took place between Mr. Mobrez and Mr. Magedson on May 5th and 12th, 2009. Specifically,
20 I listened in on the conversation from my office telephone.
21

22 5. Mr. Mobrez's Declaration is a true and accurate rendition of the conversations
23 that I witnessed between Mr. Mobrez and Mr. Magedson.

24 6. Attached hereto as EXHIBIT A is a true and accurate copy of the handwritten
25 notes I took during these conversations as they occurred.
26

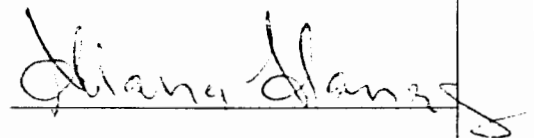
27 7. During these phone conversations, Mr. Magedson warned Mr. Mobrez against
28 bringing legal action. Specifically, on May 5, 2009, at approximately 11:30 a.m., Mr. Magedson
bragged about his legal team and warned Mr. Mobrez that he would "lose!"

1 8. Furthermore, I witnessed the conversation that took place on May 5, 2009 at
2 approximately 1:00 p.m., during which Mr. Magedson requested \$5,000 plus an additional
3 monthly fee to enroll in what Mr. Magedson referred to as the "CAP." On May 12, 2009, Mr.
4 Magedson described this "CAP" as the "negative goes away – see positive!"
5

6 9. To date, there are six reports regarding myself, Mr. Mobrez, and AEI on Mr.
7 Magedson's Web site. At this time, we have not been able to hire any new employees. These
8 false accusations have severely injured our reputations and halted each of our businesses.
9

10
11 Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury under the laws of
12 the United States of America that the foregoing is true and correct.
13

14 EXECUTED ON: May 3, 2010
15
16

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18 

19
20 Iliana Llaneras
21
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28

CERTIFICATE OF SERVICE

I certify that on May 3, 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:

David S. Gingras
Gingras Law Office, PLLC
4072 E. Mountain Vista Drive
Phoenix, AZ 85048
Attorney for Defendants

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

EXHIBIT A

55-09

11:27 am

Z Ahmed
Report Report

Report report

Editor = Ed M. (Boss)

Read cap?

Help.

Federal Army has demands

Legal team to fight

Don't try! - will lose!

Class action?

5/5/09 1 pm

Report
part

Agar on 24-11

2 pages
Figure 1
ED

→ Size + mutly(?)
→ Some Hubs

Pay 1 time = 10

Report ~~left~~
5-12-09 2:45 pm

NOT use CAP!

guy several "single".

Prague
E E Report

We Don't know names on postings.
but HE does.

called upon "Lib Core"
"more on"

What for fee?

We will see Script for cap.
dog goes away - see poster!

→ Cost \$1000 to posting - not true

What? Degree of Sign Fil forms
need to take - what?

Part of Power Mike → other or
Dog Bark → Report

What - End Doc