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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, a
19 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

**CORRECTED AFFIDAVIT OF
RAYMOND MOBREZ PURSUANT
TO THE COURT'S ORDER ON
APRIL 19, 2010 REGARDING
PLAINTIFFS' RICO AND
EXTORTION CAUSES OF ACTION**

Asia Economic Institute et al v. Xcentric Ventures LLC et al

Doc. 38 Att. 1

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

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

8 2. I make this declaration to correct the record in this case and my prior
9
10 declaration made and filed on May 3, 2010. I filed that Declaration pursuant to the
11 Court's April 19, 2010 Order. I have since learned that at the time I filed my May
12 3, 2010 Declaration, I was mistaken as to the substance of the six phone
13
14 conversations between myself and Mr. Magedson on April 27, 2009, May 5, 2009,
15 and May 12, 2009 described my May 3, 2010 declaration. There were a number
16
17 of calls made by me to Ripoff Report. In addition, there were a number of
18 incoming calls to me from Ripoff Report.. However, I make this Declaration to
19
20 correct any inaccurate testimony that I mistakenly provided.

21 3. After reviewing certain documents that were in Defendants' sole
22
23 control at the time of my prior declaration, my recollection of these events has
24
25 been refreshed.

26 4. I now realize that the prior declaration I made was mistaken in some
27
28 of the details of the times of the calls. I had also confused some of what was said in
my telephone conversations with what was written in the e-mail correspondence

1 between myself and Mr. Magedson. Specifically, in the telephone calls, Mr.
2 Magedson referred to his emails, and Mr. Magedson's emails contain a link to a
3 portion of the RipoffReport.com website that describes in more detail the
4 Defendants' Corporate Advocacy Program. On Defendants' website the CAP is
5 described, including fees associated with it. I now realize that the statement that
6 the charges are based on the size of the company may not have been in a telephone
7 call, but in a portion of the RipoffReport.com website to which Mr. Magedson's
8 email of May 12, 2010 refers. Attached hereto as Exhibit M is a true and correct
9 printout from the web address
10 <http://www.ripoffreport.com/CorporateAdvocacy/HowItWorks.aspx> as it appeared
11 on May 13, 2010. To the best of my recollection, that portion of the website
12 provided the same information in and about May 2010 as contained in Exhibit M.
13

14
15
16
17
18 5. I do specifically recall a telephone conversation with someone who
19 mentioned "five grand" as the cost for joining the Corporate Advocacy Program. I
20 do not remember the exact time or date of the call. I believe it was to or from me. I
21 do not know whether the speaker was Ed Magedson or not. I do remember that
22 this person was a fast talker
23
24

25 6. I sincerely apologize to this Honorable Court, Defendants and counsel
26 for my confusion and lapse in judgment in attempting to reconstruct my
27 conversations with Ripoff Report from the office phone records I had. Exhibit L to
28

1 my prior declaration were not notes taken at the time, but notes of my confused
2 efforts to reconstruct the exact details of the calls, based on a combination of
3 imperfect memory, documents I located at the time, and erroneous assumptions
4 drawn from Mr. Magedson's prior declarations.
5

6
7 7. I also wish to correct the statement in paragraph 5 of my prior
8 declaration that "rebuttals" do not appear as results on Internet search engines such
9 as Google and Yahoo. It is more accurate to say that in my previous searches, my
10 "rebuttal" for the Asia Economic Institute sometimes appears and sometimes does
11 not appear among the search results.
12

13
14 8. Aside from the above, my declaration of May 3, 2010 is true.

15 **Pursuant to 28 U.S.C., Section 1746, I declare under penalty of perjury under**
16 **the laws of the United States of America that the foregoing is true and correct.**
17

18
19 EXECUTED ON: May 20, 2010.
20

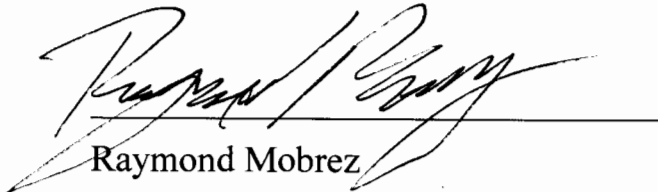
21
22 
23 Raymond Mobrez
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EXHIBIT M

...by consumers, for consumers ...scams, consumer complaints, and frauds reported. File a report, post your review or experience!



[Register to File a Report](#) | [Login](#) | [Help](#)

Don't let them get away with it.® Let the truth be known!

HOME



SEARCH COMPANY OR REPORT #

Use Advanced Search Latest Reports

- Our Program
- How It Works
- Benefits of Joining
- What Customers Say
- Application To See If You Qualify

Corporate Advocacy Program

How It Works:

If you've had a negative complaint filed about your company on the Internet, help is just a click away. Ripoff Report's Corporate Advocacy Program is a Web-based program that helps you put a restitution plan in place to right customer wrongs, turn bad buyer experiences into good customer service, and prove to your customers that your business is committed to their satisfaction.

Turn negative customer service experiences into positive opportunities for your business.

Businesses of all sizes have customer complaints and can benefit from Ripoff Report's Corporate Advocacy Program, from sole proprietorships to large multinational corporations.

Ripoff Report's Corporate Advocacy Program...

1. Verifies all reports and rebuttals, determines the truthfulness of the complaints and exposes those posted erroneously or maliciously.
2. Sends a positive email that we draft together to each person who posted a report about your company, notifying them your firm has offered to negotiate in good faith to resolve their complaint.
3. Updates all reports with your commitment to right customer wrongs.
4. Gives you, our member business, the opportunity to provide your side of the story and link to your own website, where you may post your commitment.

When you demonstrate your commitment to improving the relationships you have with your customers, you build goodwill inside and outside the company. If you heard a company say, "We are glad this came to our attention, and we want unhappy customers to contact us because we're committed to 100% customer satisfaction, and we're taking actions that will ensure this never happens again," you'd think well of the company, and so would its prospective customers.

Few are able to admit their involvement in any wrongdoing. Few are willing to go so far in pleasing their customers. Not everyone is up to the task. Are you?

Take responsibility for your business and your customers by [becoming a member today](#).

Note on Qualification:

- Fees for enrolling in the program are based upon the number of Reports filed, the number of offices you have, and/or the size of an average sale. Additionally, there is a flat set-up fee to offset the costs associated with programming and contract legalities. Rate sheets will be sent upon completion and verification of the intake questionnaire.
- If participation in this program would honestly create a financial hardship, but you desire to participate, we will work with you to find a way to make it work. This may require providing financial documents proving hardship.

[Read why consumers want to do business with a member](#)

Do-it-guide

Ripoff Report

Ripoff Report verified & safe

BUSINESSES YOU CAN TRUST

Ripped Off Get Your Money Back

GONOW!

BitterBuyer.com

Victim of a Rip-off Don't get m

Impossible IQ Question

Bet you can't get it right!

96.7% get this question wrong

what separates a

good business

bad business

now

help keep this site free

of the Corporate Advocacy Program.

Ripoff Report

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