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9

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

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

15 Plaintiffs,

16 vs.

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

23 Defendants.
24

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

DECLARATION OF TINA NORRIS

1 I, Tina Norris, declare under penalty of perjury as follows:

2 1. My name is Tina Norris. I am a resident of the State of Iowa, not a
3 party to this action, am over the age of 18 years, and if called to testify before this
4 Honorable Court or other proceeding I could and would give the following
5 testimony which is based on my own personal knowledge unless otherwise stated.

6 2. I am the owner, President and Chief Executive Officer of TNT
7 Management ("TNT"), a full service promotional staffing agency located in Des
8 Moines, Iowa.

9 3. I have operated as a licensed talent agent nearly 16 years. I am proud
10 to report that for 14 years, my company had not received a single complaint, until
11 Rip-Off Report.

12 4. My case is extreme. One individual, Guadeloupe Alsidez, posted over
13 300 negative reports about me and my company on RipoffReport.com.

14 5. Mr. Alsidez has a criminal record stemming from the early 1970s. He
15 has been harassing, extorting and cyber-bullying me since December 2006. His
16 wife was murdered looking through the peephole of her apartment in July of 2008.
17 Mr. Alsidez's criminal record, the personal threats and harassment I've endured,
18 and the murder of his wife concern me gravely.

19 6. I have hired three law firms to stop Mr. Alsidez from the daily
20 assaults and threats he imposed on my company and life. I filed complaints against
21 Mr. Alsidez in the San Antonio, Texas Police Department, the Des Moines Iowa
22 Police Department, with the Federal Bureau of Investigation and the Victims
23 Department of the Arizona State Attorney General's Office.

24 7. On of about February 19, 2009, I wrote to Editor@RipoffReport.com
25 requesting the IP addresses of persons who wrote false, inflammatory and
26 defamatory negative reports about me on RipoffReport.com. A true and correct
27 copy of my February 19, 2010 email and the responses is attached as "Exhibit 1."
28

1 8. The response I received from Ripoff Report advised me to read about
2 the Corporate Advocacy program "CAP."

3 On or about March 25, 2009 I wrote to Editor@RipoffReport.com
4 requesting to have reports about me and TNT by Mr. Alsidez taken down.
5 Attached hereto as "Exhibit 2" is a true and correct copy of my March 25, 2009
6 email.

7 9. Ripoff Report did not take down the reports from Mr. Alsidez.

8 10. On or about March 26, 2009, I wrote to Editor@RipoffReport.com
9 requesting to have reports about my 15-year-old niece and my 70-year-old mother
10 taken down. Attached hereto as "Exhibit 3" is a true and correct copy of my
11 March 26, 2009 email.

12 11. Ripoff Report did not take down the reports.

13 12. On or about March 2, 2010, I filled out a questionnaire provided by
14 Ripoff Report regarding the CAP. Attached hereto as "Exhibit 4" is a true and
15 correct copy of the questionnaire, my answers, and the email in which they were
16 provided. At the request of Ripoff Report, I also had to provide an email beginning
17 with the following statement:

18 "Dear Rip-off Report, I understand I could file rebuttals to the one or small
19 and full of reports I have. I would still like to understand the program that
20 Rip-off Report has created to try and help businesses gain consumer trust,
21 whether or not the reports are true or false. I realize, with or with out Rip-off
22 Report we would get complaints somewhere. I have already filled out the
23 form which is below for your review. Please send me the RATES and
24 whatever information you think I need to know about the benefits of joining
25 Rip-off Report Corporate Advocacy Program."
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27 Exhibit 4.
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13. On or about May 20, 2010, I received a rate sheet from Ripoff Report about the cost of joining the CAP. Attached hereto as "Exhibit 5" is the rate sheet sent to me, the sample letter that Ripoff Report suggests to send the authors of the reports and the covering email.

14. My experience with filing the "rebuttals" that Ripoff Report recommends as a first step is that they do not solve the problem. After I wrote a rebuttal, the reports against me on RipoffReport.com increased.

15. On or about June 5, 2010, I wrote to Editor@ripoffreport.com

"Financially, I am currently on the verge of bankruptcy because of your site. I am very proud of the fact that I have been able to provide for myself through my work ethics and good business practices. For me to join the corporate advocacy program, at the rate proposed, I would need to negotiate the rates you have proposed. I have over 400 reports - so many - I can't afford the program unless I can negotiate a monthly fee."

I received an email response that stated in part "You have over 400 reports? What is it you are doing wrong?" Attached as "Exhibit 6" is my June 5, 2010 email and the replies.

16. Prior to the negative reports about me on RipoffReport.com, I was a successful small business owner, operating legitimately, paying taxes, incorporated through the Secretary of State, tied into local Community boards and events.

17. Currently I am on the verge of bankruptcy, cannot make my mortgage payments, and have lost business clients and talent alike due to the excessive complaints written daily by Guadelupe Alsidez on RipoffReport.com.

18. Since the harassment through RipoffReport.com began, my company has lost an estimated \$399,000 in profits and business from the following clientele:

Client	Gross Revenues	TNT Net Profit
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1	DMJ Group – Carmike	\$650,000 Gross Revenue	\$195,000 Net Profit
2	Theatres		
3	Coca-Cola NASCAR	\$306,000 Gross Revenue	\$75,000 Net Profit
4	Daytona Weekend		
5	United States Marketing	\$450,000 Gross Revenue	\$90,000 Net Profit
6	& Promotions		
7			
8	The Talent Pool, Inc.	\$120,000 Gross Revenue	\$24,000 Net Profit
9	The C Taylor Agency	\$75,000 Gross Revenue	\$15,000 Net Profit

10 19. The negative reports on RipoffReport.com made it difficult to
11 impossible to recruit talent for our client events. TNT receives replies declining
12 work opportunities due to our bad reputation on the Internet, or being a “rip-off”
13 agency or reading things on websites creating an image that TNT conducts shady
14 business. We are unable to staff client events with talent that formerly worked with
15 us. As a result, clients have gone to agencies that can staff client events.

16 20. In the agency business, there are 4 marketing companies that utilize
17 event staffing agencies such as TNT. United States Marketing & Promotions listed
18 above will no longer use TNT due to our recent inability to staff events in a timely
19 fashion and missing deadlines, which has been caused by our difficulty in
20 recruiting talent as caused by the negative listings about TNT on
21 RipoffReport.com.
22

23 21. I have hired three law firms to stop the Internet Predators who write,
24 defame, libel and harass me, TNT and my family. Over time, each withdrew from
25 representing me because of a lack of funds or because negative reports began to
26 surface on RipoffReport.com against these attorneys.

27 22. It can be difficult to gain assistance in telling my side of the story
28 because people are afraid to get involved in anything involving RipoffReport.com.

1 At least one such person advised me that they were afraid that negative reports
2 would go up on the RipoffReport.com website about them if they tried to help me,
3 and for that reason decided not to get involved.

4 23. On or about June 3, 2010, I spoke with David Gingras over the phone,
5 who I understand is counsel for Ed Magedson and Xcentric Ventures, LLC, the
6 owner of the RipoffReport.com website. Among other things, Mr. Gingras advised
7 me that he would be willing to provide the IP addresses of the anonymous posters
8 of the reports about me on RipOffReport.com. I have provided Mr. Gingras with
9 my case files against the individuals who have been cyberstalking, bullying and
10 harassing me over the years and await receipt of the IP addresses from the
11 RipOffReport.com website.
12

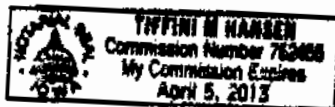
13 Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury under the
14 laws of the United States of America that the foregoing is true and correct.
15

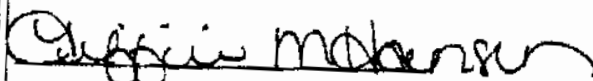
16 EXECUTED ON: June 10, 2010, at Des Moines, Iowa
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19 Tina Norris

20 Witnessed:



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23 Notary Public

24 Date: 6/10/10
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