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7 Attorneys for Plaintiffs,
 Asia Economic Institute, LLC,
 8 Raymond Mobrez, and
 Iliana Llaneras

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

12 ASIA ECONOMIC INSTITUTE, a)
 California LLC; RAYMOND)
 13 MOBREZ an individual; and ILIANA)
 LLANERAS, an individual,)
 14 Plaintiffs,)
 15 vs.)

Case No.: 2:10-cv-01360-SVW-PJW
**DECLARATION OF KRISTI
 JAHNKE IN OPPOSITION TO
 DEFENDANTS' MOTION FOR
 SUMMARY JUDGMENT**

16)
 17 XCENTRIC VENTURES, LLC, an)
 Arizona LLC, d/b/a as BADBUSINESS)
 18 BUREAU and/or)
 BADBUSINESSBUREAU.COM)
 19 and/or RIP OFF REPORT and/or)
 RIPOFFREPORT.COM; BAD)
 20 BUSINESS BUREAU, LLC, organized)
 and existing under the laws of St.)
 21 Kitts/Nevis, West Indies; EDWARD)
 MAGEDSON an individual, and DOES)
 22 1 through 100, inclusive,)

23 Defendants.
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1 I, Kristi L. Jahnke, declare under penalty of perjury as follows:

2 1. My name is Kristi Jahnke. I am a United States Citizen, a resident of
3 the State of California, am over 18 years of age, 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 upon my own personal knowledge unless otherwise
6 stated.

7 2. I am currently employed as a Law Clerk with Plaintiff Asia Economic
8 Institute, LLC ("AEI"). I have been assisting Plaintiffs' counsel with the present
9 litigation since its inception. I have possession of Plaintiffs' files with respect to
10 this case and I am personally familiar with the contents thereof.

11 3. In preparation for Plaintiffs' March 29, 2010 Opposition to
12 Defendants' Special Motion to Strike (DN-11), I conducted an online search of the
13 Plaintiffs using Google.com and the following keyword: "Asia Economic
14 Institute." The following appeared within the first three search results:

15 "Ripoff Report: Asia Economic Institute, AEI,
16 WorldEcon: Raymond ...

17 Asia Economic Insitute, AEI, WorldEcon: Raymond
18 Mobrez And Iliana Llaneras Complete Exploitation
19 as an employee. Do not work for the Asia
20 Economic..."

21 4. I then pursued an investigation into the meta tag data embedded into
22 the HTML script of each "Ripoff Report" regarding the Plaintiffs.

23 5. In doing so, I discovered the Defendants' Answer in Certain Approval
24 Programs, LLC v. Xcentric Ventures, case number CV08-1608-PHX-MHB, and
25 attached hereto as Exhibit 1. In that case, Defendants admit the following:

26 a. "Admit that Xcentric's servers automatically create certain HTML
27 code for each page on www.RipoffReport.com. Admit that every
28 webpage on the Website containing a 'report' has a title meta tag that
contains 'Rip-off Report.'" Defendants' Answer ¶ 33

1 b. "Admit that Xcentric's servers automatically create certain tags which
2 contain information about the contents of each web page for indexing
3 and searching purposes... Admit that Xcentric's servers automatically
4 include the words 'rip-off,' 'ripoff' and 'rip off' in certain tags..."
5 Defendants' Answer ¶ 35.

6 c. "Admit that Xcentric's servers automatically included 'Rip-off
7 Report:' in the title tag..." Defendants' Answer ¶ 42.

8 d. "Admit that Xcentric's servers automatically created a description tag
9 which contains certain content provided solely by the author of the
10 report." Defendants' Answer ¶ 43

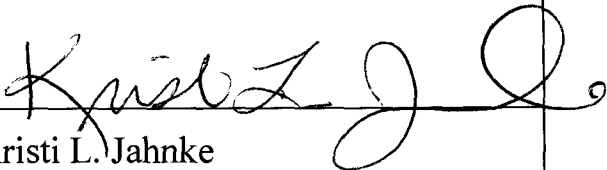
11 6. To view the HTML script of each Ripoff Report, I took the following
12 steps: (1) Using Internet Explorer Version 6, I clicked on the drop-down menu
13 entitled "View" in the upper left corner of the window, and selected "View
14 Source"; (2) I then viewed the new window that opened as a text file displaying the
15 HTML script for the webpage.

16 7. The title, keyword, and description meta tags appeared on the first
17 page of the text files associated with each Ripoff Report. Attached hereto as
18 EXHIBIT 1 is a true and accurate copy of the text files for the Ripoff Reports Nos.
19 417493, 423987, 457433, 502429, 564331, and 571232 in this action as they
20 appeared on or about March 29, 2010 when I assisted in preparing the Opposition
21 to Defendants' Motion to Strike. The meta tags are highlighted in yellow for this
22 Court's convenience.

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24 Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury under
25 the laws of the United States of America that the foregoing is true and correct.
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EXECUTED ON: June 4 2010


Kristi L. Jahnke