

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3

4 ASIA ECONOMIC INSTITUTE, LLC, a)
California LLC; RAYMOND MOBREZ,)
5 an individual; and ILIANA)
LLANERAS, an individual,)
6)
Plaintiffs,)
7)

vs.)

Case No:

2:10-cv-01360-SVW-PJW

8 XCENTRIC VENTURES, LLC, an)
9 Arizona LLC, d/b/a as BADBUSINESS)
BUREAU and/or)
10 BADBUSINESSBUREAU.COM and/or)
RIP OFF REPORT and/or)
11 RIPOFFREPORT.COM; BAD BUSINESS)
BUREAU, LLC, organized and)
12 existing under the laws of)
St. Kitts/Nevis, West Indies;)
13 EDWARD MAGEDSON, an individual,)
and DOES 1 through 100,)
14 Inclusive,)
15 Defendants.)

16
17 THE 30(B)(6) VIDEOTAPED DEPOSITION OF
18 EDWARD MAGEDSON was taken on June 2, 2010 at the
19 offices of Jaburg & Wilk, P.C., 3200 North Central
20 Avenue, Suite 2000, Phoenix, Arizona, commencing at the
21 hour of 10:54 a.m. before Marcella Daughtry, a
22 Registered Professional Reporter and Arizona Certified
23 Reporter, in and for the State of Arizona.
24

25 Pages 1 - 201

1 Q There's no question pending.

2 A I know there is no question pending. You are
3 gonna just try and make it look bad. That's your goal,
4 is to try --

5 Q No question pending.

15:02:14

6 Now, when you ask -- when Xcentric asks
7 for a 36-month commitment through these contracts, who
8 exactly asks for the commitment from -- who at
9 Xcentric -- strike that.

10 When Xcentric asks for a 36-month

15:02:47

11 commitment through a contract, who at Xcentric asks for
12 that commitment?

13 A Me.

14 Q You. Anyone else?

15 A No.

15:02:57

16 Q No. Just you?

17 A Just me.

18 Q Okay. How many of these contracts have you
19 sent out and reviewed? How many -- strike that.

20 How many of these contracts have you

15:03:13

21 been involved with? By you, I mean Xcentric.

22 A Without a protective order, I don't want to
23 answer that question.

24 Q So you are refusing to answer it?

25 A Without a protective order, I don't want to

15:03:25

1 answer that question.

2 Q I'm not asking you about specific people. I'm
3 not asking you about specific businesses, no addresses,
4 no nothing, just a number. That's it.

5 A No, because -- I'm not going to explain why.

15:03:35

6 But it's -- it's already caused a problem in the past,
7 and I'm not going to explain -- I'm not going to give
8 that unless there is a protective order in place.

9 Q Are you afraid to give that information?

10 MR. GINGRAS: Objection.

15:03:49

11 Don't answer that question.

12 THE WITNESS: I won't.

13 Q BY MR. BLACKERT: Okay. Walk me through how
14 it -- the steps -- how it gets from the rebuttal
15 e-mails to the business actually becoming enrolled in

15:04:18

16 the CAP.

17 A You would have to ask that again.

18 Q Okay. Walk me through the steps after the
19 rebuttal e-mail that the business gets enrolled into
20 the CAP program.

15:04:37

21 MR. GINGRAS: Objection. I don't think
22 this accurately reflects his testimony.

23 THE WITNESS: I'm not even understanding
24 your question.

25 Q BY MR. BLACKERT: Okay. Fine. I will

15:04:45

1 rephrase it.

2 MR. GINGRAS: I think we first need
3 to clarify what you are referring to as the rebuttal
4 e-mail. We have talked about filing rebuttals and then
5 sending e-mails. Those are two different things.

15:04:56

6 Q BY MR. BLACKERT: You testified earlier that
7 you -- strike that.

8 You testified earlier that you send an
9 e-mail after -- you send an e-mail suggesting that an
10 individual file a rebuttal, correct, an individual at a

15:05:06

11 business?

12 A Correct.

13 Q What happens next?

14 A I can't speculate on what happens next. I
15 don't know what you mean. What do you mean what

15:05:21

16 happens next?

17 Q If the individual or business wants to go
18 forward with the CAP program --

19 A Okay.

20 Q -- what's your next contact with them?

15:05:29

21 A They want to go next?

22 Q Yes.

23 A If they say they want to join the program, I
24 send them a more detailed questionnaire about the
25 company.

15:05:39

1 Q Is that questionnaire different from the
2 questionnaire on your website, on Ripoff Report's
3 website?

4 A Yes.

5 Q It is different. Okay.

15:05:49

6 And you said it's more detailed?

7 A Yes.

8 Q How is it more detailed?

9 A It gets into -- and this is still -- they
10 haven't been approved yet.

15:06:02

11 Q Right.

12 A So it depends on how they answer the questions
13 to these -- to this e-mail, but there is questions
14 like, why did you get complaints? What was the cause
15 of the complaints? What improvements? I want -- I

15:06:23

16 want information right now, you know. How are you
17 going to make -- what improvements have you made? What
18 was -- what were the problems and what are you doing to
19 avoid those problems in the future? The name of the
20 person who will be signing the agreement. What's the

15:06:44

21 name of the company that the agreement's gonna be in?
22 Why do you feel -- I think it's, why do you feel -- I
23 forget. I can't.

24 Q That's fine.

25 A I can't remember. I can't remember.

15:07:18