

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)

8 vs.)

Case No:

2:10-cv-01360-SVW-PJW

9 XCENTRIC VENTURES, LLC, an)
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,)
Defendants.)
15)

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

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1 MR. GINGRAS: Objection, form, and
2 beyond the scope of the 30(b)(6).

3 Q BY MR. BLACKERT: Okay. And it's your
4 practice not to remove posts?

5 A Correct.

14:34:23

6 Q Have you ever removed posts in the past?

7 A We don't have a practice of removing posts.

8 Q Okay. Now, when an aggrieved party, meaning
9 someone who has filed a -- someone -- strike that.

10 When someone has Ripoff Report filed

14:34:47

11 against them and they want to ascertain the identity of
12 the posters, how do they go through Xcentric to do
13 that?

14 MR. GINGRAS: Objection. Beyond the
15 scope of the 30(b)(6).

14:35:00

16 You can answer if you want to and if you
17 know the answer.

18 THE WITNESS: I think it's called
19 Mobrez.

20 MR. GINGRAS: Mobilisa.

14:35:12

21 THE WITNESS: Mobilisa. Okay. They
22 have to comply with Mobilisa. I forget. I can't
23 pronounce it.

24 Q BY MR. BLACKERT: Are you referring to like a
25 subpoena?

14:35:26

1 Q Okay. Is there any other ways you would take
2 these postings off Ripoff Report?

3 A The posting isn't removed.

4 Q Okay.

5 A I didn't say that.

14:39:30

6 Q Okay.

7 A The words -- those certain words, certain
8 offending words, would be redacted so the consumer
9 wouldn't -- it would just say redacted.

10 Q Okay. I understand now.

14:39:44

11 Are there any other cases where certain
12 words would be redacted?

13 A There could be. I'm just -- at this minute, I
14 can't think. So you are asking me questions, and when
15 you are sitting in the hot seat, you know, sometimes

14:39:56

16 you don't think clearly and you can't remember
17 everything. But -- but I can't think of anything. If
18 I do think of something, I will tell you.

19 Q Okay.

20 A Give me a second. I do want to think about

14:40:11

21 it. You are asking me, is there any other times
22 that -- that we would remove something?

23 Q That Ripoff Report would remove some, yes,
24 content part of the posting, not the posting itself?

25 A Yeah. I'm not thinking. We remove Social

14:40:28

1 Security numbers, threats of violence. And if
2 somebody -- a monitor misses it, which it could happen,
3 you know, the person contacts us, you know, Social
4 Security numbers, driver's license number, bank account
5 numbers, those kinds of things are redacted. The

14:40:48

6 report is not removed.

7 Q Got it.

8 A It's redacted.

9 Q Are there any other types of crimes that are
10 removed from the posting other than you've mentioned?

14:40:59

11 A There could be; I just -- just not coming to
12 mind right at this moment. So there could be. I don't
13 think there is anything, but there could be.

14 Q What about tax fraud?

15 A That would be up to the consumer. Even like

14:41:15

16 with criminal stuff, we try to get them to post and
17 redact certain things, but I would pretty much -- it's
18 possible, depending upon the nature of the -- of the --
19 possible. So I can't say for sure.

20 MR. GINGRAS: Just to be clear, I think

14:41:40

21 Dan might have been referring to something, and you
22 might have misunderstood, and I want to be sure I
23 understand. Is your question relating to allegations
24 of criminal wrongdoing or convictions? Because I think
25 Ed was talking about convictions. If a report says

14:41:56