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Asia Economic Institute, LLC
Raymond Mobrez, and
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

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

Plaintiffs,

vs.

XCENTRIC VENTURES, LLC, an
Arizona LLC, d/b/a as BADBUSINESS
BUREAU and/or
BADBUSINESSBUREAU.COM
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

**PLAINTIFFS' FIRST SET OF
REQUESTS FOR ADMISSIONS TO
DEFENDANT, XCENTRIC
VENTURES, LLC**

Plaintiffs' First Set of RFAs to Xcentric Ventures, LLC

1 Pursuant to Federal Rule of Civil Procedure 36, Plaintiffs, ASIA
2 ECONOMIC INSTITUTE LLC, RAYMOND MOBREZ, and ILIANA
3 LLANERAS (“Plaintiffs”), propound the following requests for admission to
4 Defendant, XCENTRIC VENTURES, LLC (“Xcentric” or “YOU”), each of
5 which is to be answered fully and separately, in writing, under oath and within
6 thirty (30) days from the date of service. These requests are continuing
7 requests pursuant to Federal Rule of Civil Procedure 26(e), and your answers
8 must be supplemented in accordance with Rule 26(e).

9 **INSTRUCTIONS**

- 10
- 11 1. Terms that are capitalized are defined and/or explained in the
12 Definitions
 - 13 2. Unless terms have been given a specific definition or
14 explanation herein, each term shall be given its usual and
15 customary dictionary definition or explanation as used in
16 proper English grammar except where such terms have a
17 specific custom and usage definition in your profession, trade
18 or industry, in which case they shall be interpreted in
19 accordance with such usual custom and usage definition in your
20 profession, trade, or industry, of which you are aware. In
21 construing the requests herein: (i) the singular shall include the
22 plural and the plural shall include the singular; and (ii) a
23 masculine, feminine, or neuter pronoun shall not exclude the
24 other genders, all to the end that the interpretation which is
25 applied to the requests shall result in more expansive response
26 to this request.
 - 27 3. Unless otherwise stated, these Requests refer to the time period
28 of June 4, 2004 to the present.

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DEFINITIONS

1. “YOU” or “YOUR” means DEFENDANT XCENTRIC VENTURES, LLC and its directors, officers, investigators, agents, employees or other representatives, where applicable.
2. “DEFENDANTS” mean XCENTRIC VENTURES, LLC and ED MAGEDSON, unless otherwise specifically stated.
3. “PLAINTIFFS” means ASIA ECONOMIC INSTITUTE LLC, RAYMOND MOBREZ, and ILIANA LLANERAS.
4. “PERSON” can mean either a natural person or an incorporated or unincorporated business entity or partnership, including but not limited to a limited liability company, a limited liability partnership, general partnership, joint partnership, joint venture, sole proprietorship, “doing business as,” and/or public limited company.

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REQUESTS FOR ADMISSION

1. Admit that YOU currently charge an initial fee of Seven Thousand Five Hundred Dollars (\$7,500) for a PERSON to enroll in the Corporate Advocacy Program (hereinafter, “CAP”).
2. Admit that the \$7,500 fee for a PERSON to enroll in CAP is currently the same for all members.
3. Admit that YOU require PERSONS that enroll in CAP to enter into a 36-month agreement (“CAP Agreement”).
4. Admit that YOU require PERSONS that enroll in CAP to pay a monthly fee.
5. Admit that the monthly fee for a CAP member is a fixed fee between \$100 a month and \$3,500 per month.

- 1 6. Admit that the monthly fee is a fixed rate over 36 months under
2 the CAP Agreement.
- 3 7. Admit that YOU caused one or more telephone conversations
4 between EDWARD MAGEDSON and PLAINTIFF, RAYMOND
5 MOBREZ on April 12, 2010 to be recorded.
- 6 8. Admit that YOU caused a telephone conversation between
7 EDWARD MAGEDSON and PLAINTIFF, RAYMOND
8 MOBREZ on April 27, 2010 to be recorded.
- 9 9. Admit that YOU caused a telephone conversation between
10 EDWARD MAGEDSON and PLAINTIFF, RAYMOND
11 MOBREZ on May 5, 2010 to be recorded.
- 12 10. Admit that YOU caused a telephone conversation between
13 EDWARD MAGEDSON and PLAINTIFF, RAYMOND
14 MOBREZ on May 9, 2010 to be recorded.
- 15 11. Admit that since January 1, 2009, YOU have been aware of
16 YOUR practice of recording telephone conversations with
17 PERSONS that call YOU.
- 18 12. Admit that YOU quoted an enrollment fee of \$7,500 to at least one
19 prospective applicant to CAP.
- 20 13. Admit that YOU quoted an enrollment fee of less than \$7,500 to at least
21 one prospective applicant to CAP.
- 22 14. Admit that YOU quoted an enrollment fee of more than \$7,500 to at least
23 one prospective applicant to CAP.
- 24 15. Admit that YOU have quoted an enrollment fee of \$7,500 for CAP to at
25 least one PERSON in the State of California.
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- 1 16. Admit that YOU have quoted an enrollment fee for CAP to at least one
2 PERSON in the State of California.
- 3 17. Admit that YOU have offered to enter into the CAP Agreement with at
4 least one PERSON in the State of California.
- 5 18. Admit that YOU have entered into the CAP Agreement with at least one
6 PERSON in the State of California.
- 7 19. Admit that YOU redact portions of Ripoff Reports for PERSONS that
8 enroll in CAP.
- 9 20. Admit that JOHN BECK is a member of CAP.
- 10 21. Admit that participation in CAP requires monthly payments.
- 11 22. Admit that YOU will not consider a PERSON for enrollment in CAP
12 unless they fill out two questionnaires.
- 13 23. Admit that YOU publish “Ripoff Reports” on the Internet about
14 PLAINTIFFS.
- 15 24. Admit that YOU have made changes to portions of the RipoffReport.com
16 website from January 1, 2009 to June 4, 2010.
- 17 25. Admit that the fees for enrolling in CAP are based upon the number of
18 “Ripoff Reports” filed.
- 19 26. Admit that at least one PERSON that entered into the CAP Agreement
20 with YOU failed to make at least one monthly payment.
- 21 27. Admit that on at least one occasion, YOU have attempted to cause a CAP
22 member that failed to perform its obligation under the CAP Agreement to
23 make monthly payments, to perform such obligation.
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DATED: June 4, 2010

By: /s/ Lisa J. Borodkin

DANIEL F. BLACKERT
LISA J. BORODKIN
Attorneys for Plaintiffs,
Asia Economic Institute,
Raymond Mobrez, and Iliana
Llaneras



Lisa Borodkin <lborodkin@gmail.com>

AEI v. Xcentric: AEI's First Set of RFAs to Xcentric

Lisa Borodkin <lisa@lisaborodkin.com>

Fri, Jun 4, 2010 at 6:00 PM

To: david@ripoffreport.com, Maria Crimi Speth <mcs@jaburgwilk.com>

Cc: Daniel Blackert <blackertesq@yahoo.com>, kristi@asiaecon.org, alexandra@asiaecon.org

David and Maria,

Please find attached Plaintiff AEI's first set of Requests for Admission to Defendant Xcentric Ventures LLC.

Lisa

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Lisa J. Borodkin

lisa@lisaborodkin.com

323-337-7933



023-Ps first set of RFAs.pdf

26K
