

1 DANIEL F. BLACKERT, ESQ., CSB No. 255021  
 2 LISA J. BORODKIN, ESQ. CSB No. 196412  
 3 **Asia Economic Institute LLC**  
 4 11766 Wilshire Blvd., Suite 260  
 5 Los Angeles, CA 90025  
 6 Telephone (310) 806-3000  
 7 Facsimile (310) 826-4448  
 8 Daniel@asiaecon.org  
 9 Blackertesq@yahoo.com  
 10 lisa@asiaecon.org  
 11 lisa\_borodkin@post.harvard.edu

12 Attorney for Plaintiffs,  
 13 Asia Economic Institute LLC,  
 14 Raymond Mobrez, and  
 15 Iliana Llaneras

16 **UNITED STATES DISTRICT COURT**  
 17 **CENTRAL DISTRICT OF CALIFORNIA**

18 ASIA ECONOMIC INSTITUTE LLC,  
 19 a California LLC; RAYMOND  
 20 MOBREZ an individual; and ILIANA  
 21 LLANERAS, an individual,

Case No.: 2:10-cv-01360-SVW-PJW  
**DECLARATION OF LAURA J. SNOKE**

22 Plaintiffs,

23 vs.

24 XCENTRIC VENTURES, LLC, an  
 25 Arizona LLC, d/b/a as BADBUSINESS  
 26 BUREAU and/or  
 27 BADBUSINESSBUREAU.COM  
 28 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.

1 I, Laura J. Snoke, declare under penalty of perjury as follows:

- 2 1. My name is Laura J. Snoke. I am a United States Citizen, a resident of the  
3 State of California, I am over 18 years of age, and if called to testify in 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  
6 otherwise stated.
- 7 2. I am extremely interested in the outcome of this case. I attended the hearing  
8 in this matter on July 12, 2010. I am hoping there will be a trial so that  
9 people like me can at least tell my side of the story in a public hearing.
- 10 3. I am an educated and professional woman. I received my Juris Doctor  
11 Degree from Loyola Law School and my B.A. from California State  
12 University at Northridge I am a member of the California BAR and have  
13 been since I was admitted in 1981.
- 14 4. I am an attorney with an office at the Law Offices of Laura J. Snoke, 1801  
15 Century Park East, Suite 2400, Los Angeles, California 90067.
- 16 5. In or around September of 2007, a client came into my office and notified  
17 me that there was an anonymous posting on the Rip-off Report about me. It  
18 is Report # 241047. The report is substantively untrue and, I believe, was not  
19 posted by a client but by an adversary. This man is a jailhouse lawyer who  
20 unsuccessfully sued several of my clients. I represented these individuals.  
21 This "gentleman" was ultimately sent back to jail as a result of fraudulent  
22 filings with the court.
- 23 6. After reviewing this report, my husband went online and spent several hours  
24 researching Rip-off Report. He told me that Rip-off Reports sets forth in  
25 their on-line literature that nothing can be done to remove reports or  
26 postings.
- 27 7. I have received periodic faxes and at least one (1) telephone call from  
28 individuals who claim that they can "remove" the report or make sure it

1 doesn't display so prominently by moving "down" several pages. I received  
2 one approximately one to three weeks before the day of the hearing, July 12,  
3 2010. They quote fees for such services ranging from \$12,000 to \$16,000.

4 8. In meeting with new potential clients for consultation, some have raised  
5 mentioned this Rip-off Report.

6 9. Specifically as a result of this Rip-off Report about me, I have spent  
7 approximately \$3,000 to set up a website with LexisNexis. I pay monthly  
8 maintenance fees of \$277 for this website. I also have joined other online  
9 services such as LinkedIn and Naymz in an effort to cause this Rip-off  
10 Report posting to go lower on the search engines.

11 10. My understanding is that filing a rebuttal to a Rip-off Report is  
12 counterproductive, because it is only likely to increase the Rip-off Report  
13 about me in search engine rankings and bring more web traffic to my Rip-off  
14 Report. I also believe that filing a rebuttal does not address the main harm  
15 because the way the Rip-off Reports are displayed in Google search engine  
16 results, only the negative information in the title of the Ripoff Report is  
17 visible and not the rebuttal. This is enough for a potential client to form a  
18 bad impression of me.

19 11. I met Plaintiffs' counsel, Lisa Borodkin and Daniel Blackert for the first  
20 time after the hearing in this matter on July 12, 2010. It was only after then  
21 that I told them the experiences that I have written about in this declaration.

22 **Pursuant to 28 U.S.C., Section 1746, I declare under penalty of perjury under**  
23 **the Laws of the United States of America that the foregoing is true and**  
24 **correct.**

25  
26 Dated: July 26, 2010

27   
28 Laura J. Snoke