

EXHIBIT 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

GEORGE S. MAY)
INTERNATIONAL COMPANY,)
)
Plaintiff,)
)
-vs-)
)
XCENTRIC VENTURES, LLC,)
RIP-OFF REPORT.COM)
BADBUSINESSBUREAU.COM,)
ED MAGEDSON, VARIOUS)
JOHN DOES, JANE DOES AND)
ABC COMPANIES,)
)
Defendants.)

Case Number 04-C-6018

Judge Norgle

DECLARATION OF ISRAEL KUSHNIR IN SUPPORT OF PLAINTIFF GEORGE S. MAY INTERNATIONAL COMPANY’S RESPONSE IN OPPOSITION TO DEFENDANTS’ MOTION FOR PARTIAL SUMMARY JUDGMENT AND IN SUPPORT OF GEORGE S. MAY INTERNATIONAL COMPANY’S STATEMENT OF ADDITIONAL FACTS PURSUANT TO RULE 56.1(b)

I, Israel Kushnir, under penalty of perjury, declare and state as follows:

1. I am the President of George S. May International Company, (“GSMIC”) which is headquartered in Park Ridge, Illinois.
2. I have been employed by GSMIC since 1981, and have been President since 2002. As President, I oversee all aspects of the administration and operations of the company including, sales, human resources and finances.
3. I began my career at GSMIC as a business analyst. In my 26 years with the company, I progressed to an executive analyst position, managing director of GSMIC’s Western American Division, managing director of GSMIC’s Headquarters American Division, and finally, to president of GSMIC. As a result of my current position and my many years as an

employee of GSMIC, I have full knowledge of, and I am competent to testify to, all matters stated herein. This declaration is based on my own personal knowledge of GSMIC's business practices, procedures, and financial status. If called upon as a witness, I would competently testify to the following:

4. GSMIC is one of the largest and oldest management consulting firms in the country, and has been in business since 1925.

5. Dorothy May Campbell is the majority shareholder/owner of George S. May International Company and is alive.

6. GSMIC's business is, essentially, its people; its team of personnel advises businesses on ways to effectively and efficiently manage their businesses by reducing waste, streamlining operations, increasing profits, and improving responsiveness to the market.

7. Because it is a service-based business as opposed to, for example, a manufacturer, GSMIC relies heavily on the good reputation of its business and its sales force to stay competitive.

8. GSMIC has been the target of several false and deceptively misleading postings on the websites, www.ripoffreport.com and www.badbusinessbureau.com.

9. The websites and the postings therein are publicly accessible by anyone with an internet connection.

10. The false, deceptively misleading, and defamatory statements on the websites, including, but not limited to the posting annexed as Exhibit A and B to Defendants' Statement of Uncontested Facts are, therefore, particularly damaging to GSMIC and affect its ability to obtain and retain customers.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 27, 2006
Park Ridge, Illinois

A handwritten signature in black ink that reads "Israel Kushnir". The signature is written in a cursive style with a large initial 'I' and a long horizontal stroke at the end.

Israel Kushnir