

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

DOCKETED
OCT 12 2004

DECLARATION OF RACHEL M. KINDSTRAND

I, Rachel M. Kindstrand, have personal knowledge of the facts alleged herein, am competent to testify, and if called as a witness, would testify as follows:

1. I am an attorney licensed and in good standing with the State Bar of Illinois, and I am admitted to practice before the General Bar of the United States District Court for the Northern District of Illinois, Eastern Division.

2. I have entered an appearance as counsel for Plaintiff George S. May International Company in the above-captioned case.

3. I make this declaration in support of the Exhibits which are attached to this Declaration. This Declaration is made in support of Plaintiff's Brief in Support of Preliminary Injunction.

4. On October 6, 2004, I personally went to Defendants' website, www.ripoffreport.com. I inputted "George S. May" into the search request dialogue box. A

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number of entries for reports involving Plaintiff were generated. I viewed and printed several of the reports which are attached as Exhibit A to this Declaration:

a. A report entitled "George S. May International deceptive company, false promises, raped & pillaged us, ripoff...";

b. A report entitled "George S. May ripoff 'The Prostitute of the Consulting Business...'"

5. On October 6, 2004, I selected a website link to www.edmagedson.com which was located on the Ripoff Report website. I printed off a number of pages which describe Defendant Ed Magedson, and are attached as Exhibit B.

6. On October 6, 2004, I ran a search in the search engine "Google" using the keyword "Ed Magedson." I selected a search result entitled "GoodBusinessBureau.com," viewed the results, and printed the material attached as Exhibit C.

7. On October 6, 2004, I personally went to Defendants' website, www.ripoffreport.com, and printed off the "home page" which provides instructions to consumers. These pages are attached as Exhibit D.

8. On October 6, 2004, I personally went to Defendants' website, www.ripoffreport.com, and linked to the "revenge guide" link on Defendants' home page. I viewed the material which was located at www.ripoffrevenge.com and printed that material, which is attached as Exhibit E.

9. On October 6, 2004, I personally went to Defendants' website, www.ripoffreport.com, and linked to the "donations" link on Defendants' home page. I viewed the material soliciting donations, and printed the material which is attached as Exhibit F.

10. On October 6, 2004, I personally went to Defendants' website, www.ripoffreport.com, and linked to the "ripoff reporters" link on Defendants' home page. I viewed the material soliciting ripoff reporters, and printed the material which is attached as Exhibit G.

11. On October 6, 2004, I personally went to Defendants' website, www.ripoffreport.com. I inputted "George S. May" into the search request dialogue box. A number of entries for reports involving Plaintiff were generated. A number of entries for reports involving Plaintiff were generated. I viewed the reports, and printed an example of the dialogue box found at the end of the reports which allows companies to post a rebuttal and the rebuttal rules. This material is attached as Exhibit H.

12. On October 6, 2004, I personally went to Defendants' website, www.ripoffreport.com. I linked to the section of the website entitled "FAQ," (Frequently Asked Questions), viewed the material and printed the material attached as Exhibit I.

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

Executed on October 6, 2004
Chicago, Illinois.


Rachel M. Kindstrand

**See Case File for
Exhibits**