

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**DR. MAX D. ANTOINE, PRO SE LITIGANT**

**114 BROUGHTON AVENUE**

**BLOOMFIELD, NEW JERSEY 07003**

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**"A Legal Issue Clearly Stated Is a Legal Issue Half Solved"**

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10-1392  
(WJM)

**DR. MAX D. ANTOINE, MAX ANTOINE,**

**AMERICAN CORPORATE SOCIETY,**

**Plaintiffs,**

**V.**

**CIVIL ACTION**

**XCENTRIC VENTURES, LLC,**

**(RIPOFF REPORT.COM),**

**JOHN DOES and JANE DOES,**

**DOCKET#**

**AND ED MAGEDSON, et al**

**Defendants,**

**(ONLINE CYBER DEFAMATION)**

**FEDERAL VIOLATIONS & JURY DEMAND**

**"COMPLAINT AGAINST CHARACTER ASSASSINATION"**

**By way of State and Federal Claims Against the above Said Foregoing Defendants,  
Plaintiffs Dr. Max D. Antoine or Max Antoine, and American Corporate Society,  
"Under Oath", truthfully State and factually allege as follows:**

**COUNT ONE**

**JURISDICTION AND VENUE**

1. This District Court has full vested jurisdiction of this Complaint under the Organized Crime Control Act of 1970, 18 U.S.C -1964 (a) and (c) (Racketeer Influenced and Corrupt Organization), also known as the Rico Act; the CDA Act, 47 U.S.C. 230, 28 U.S.C. et seq, 1331(**Federal Question and Issues**); and 28 U.S.C -1337 (**Commerce and Business**); and under the principles of supplemental jurisdiction under 28 – U.S.C 1367.

2. Conditional ground; Subject matter jurisdiction exists based on 28 U.S.C -1332, because the amount in controversy remarkably and apparently exceeds \$75,000.00, exclusive of accumulated business losses, financial ruins, loss of business income, future employment base income, interests, filing fees, and legal costs, and because the controversy is between Citizens of a State and Citizens of a foreign State, and possibly a foreign Country since Defendant Ed Magedson has recently fled the United States as a Fugitive. **(A District Court Federal Judge has issued a National Warrant for his immediate arrest for online crime extortions, SEE Exhibit #A)**
3. Personal jurisdiction over the Defendants is further proper based on New Jersey Civil Practice Law, the New Jersey law against Cyber defamation, the New Jersey LAD laws, and Rules 302 and Rule 4(h) of the Federal Rules of Civil Procedures.
4. Personal Jurisdiction and Venue in this action are predicated upon 18 U.S.C – 1965 and on 28 U.S.C 1391 (b), since these Defendants further transact their cyber affairs in the District of New Jersey, and further activities of the Defendants giving rise to this Complaint obviously took place in the District of New Jersey.

## COUNT TWO

### **DEFENDANTS' CONTACTS TO THE JURISDICTION OF THIS COURT**

5. Defendants maliciously, conspiratorially, egregiously, and/or recklessly published defamatory information about Plaintiffs, a New Jersey licensed business, the

American Corporate Society, and New Jersey resident; and published same via the Internet with New Jersey Citizens, the State of New Jersey, resulting in significant tortuous injuries, financial and psychological harms to Plaintiff Dr. Antoine and his excellent reputation, The bulk, if not all of the harm has occurred and will continue to occur in the State of New Jersey, which gives immediate rise to an undisputable claim cognizable in the state of New Jersey.

6. Defendants' tortuous and egregious conduct is proximately directed specifically towards Plaintiff American Corporate Society, which is a business based in New Jersey State, and **Max Antoine** who is a resident of the New Jersey state. As such, it is accurate, proper, equitable and sufficiently reasonable to lawfully require Defendants to defend this Complaint in New Jersey State.
7. While Defendants are based in Arizona State, the Websites they entirely owned, and proximately operate are interactive. Defendants and their websites solicit, and receive funds also from New Jersey residents as part of the financial activities of their web sites.
8. Defendants' racketeering and defamatory websites perform several activities which make the web sites interactive in nature; one of the activities of Defendants' websites is to maliciously encourage, promote, and egregiously authorize individuals or virtual entities to post fabricated reports, "rebuttals" and defamatory updates to maliciously report about everything from businesses such as Plaintiff, to "extra marital affairs" to

“corrupt government employees, police officers, discriminatory hates, racial hatreds, & negative politicians”. When individuals seek to post reports, rebuttals, or updates on Defendants’ websites they simply required to only register with the websites and provide fake identifying information such as fabricated names, **inflated stories**, email addresses and residential addresses.

9. Based on the aforesaid, Defendants’ websites frivolously invent interaction between Defendants and fictitious users, viewers, including ongoing financial business transactions. Remarkably, Defendants’ websites are interactive and commercial, and provide sufficient minimum contacts to subject Defendants to the jurisdiction of this most powerful District Court.

### **COUNT THREE**

#### **THE PARTIES**

10. Plaintiffs, **American Corporate Society**, (“ACS” is a corporate LLC entity duly authorized and organized under the **licensing** laws of the **State Secretary** of the State of New Jersey, Washington State, Florida, Georgia, Pennsylvania with its principal place of business in Essex County, the State of New Jersey. ACS’ main office is located at 114 Broughton Ave, Bloomfield, New Jersey 07003, USA.
11. Upon investigative information and proximate belief, Defendant, Xcentric Ventures, LLC (“Xcentric”) is a for-profit limited liability company, duly organized as a

criminal base enterprise under the laws of the State of Arizona, and has been making millions of unreported cash dollars since its initial inception by **Extortionist Ed Magedson**.

12. Upon investigative information, classified leads and proximate belief, Defendant, Xcentric Ventures, fabricates and publishes a website that is available and has been visited by online viewers in the State of New Jersey and throughout the United States of America and the business world.
13. Upon investigative information and proximate belief, Defendant Ed Magedson ("**Magedson**"), **Now a Fugitive on the Run**, was a resident of the State of Arizona prior to a Federal Court Warrant for his immediate Capture and Arrest. He is being sought by the Feds for the crime of being a repeated Financial Extortionist, "**using the world wide web**".
14. Upon investigative information and proximate belief, Defendant Ed Magedson is a Principle, Owner, Investor, Partner, Creator, Criminal Architect, Shareholder, Master brain, and Manager of Defendant Xcentric which is of course a **criminal enterprise** and has egregiously controlled and proximately directed the daily financial activities of Defendant Xcentric.
15. Jointly and severally, the Defendants Magedson and Xcentric own and operate these two conspiratorial websites, (I) 'The Rip-Report, "located at <http://.ripoffreport.com>

and at <http://.badbusinessbureau.com> (collectively [www.ripoffreport.com](http://www.ripoffreport.com)”) and (ii) and “Rip-off Revenge”, located at <http://www.ripoffrevenge.com>

16. Defendant Xcentric Ventures LLC is of course and remarkably the main Domain Name Registrant of the websites [www.ripoffreport.com](http://www.ripoffreport.com), and is physically located at P.O. Box 470, Tempe, Arizona 85280, and further physically located at 3443 N. Central Avenue, Suite 706, Phoenix Arizona 85012, Fax and Telephone number (602) 445-1850.
17. Ed Magedson is the actual Administrative and Billing Responsible contact for both domain names. Magedson has been listed as a Fugitive by U.S. Marshall’s Most Wanted List, is also the financial creator and self-proclaimed “**Chief-Editor**” of the website [www.ripoffreport.com](http://www.ripoffreport.com). Prior to being a Fugitive on the Run, Mr. Edward Magedson’s mailing address was at P.O. Box 310, Tempe, Arizona, 85280 and also at 3443 N. Central Ave, Suite 706, Phoenix, Arizona 85012.

#### **COUNT FOUR**

#### **FACTUAL AND UNDISPUTED ALLEGATIONS**

18. Plaintiff, American Corporate Society, “ACS” is based in Bloomfield, New Jersey, was founded in February 2005 as a full service multiple agency with a focus on Tax preparations, Real Estates, Mortgages, Title work, Credit Repair, and Immigration Service Provider. Its main website is address is located at

www.americancorporatesociety.com, and www.jlsecurity.biz, and  
www.tristatetitlesearch.info

19. Plaintiff spend thousands of dollars each year on infomercials, commercials, mass marketing, television and radio talk shows, and other advertising avenues to legitimately promote its authorized and licensed services.
20. As a further means to promote its products, Plaintiffs ACS and Max Antoine created an internet website, at <http://www.americancorporatesociety.com>, to prospectively enable Good-Faith Consumers to learn about Plaintiffs bona-fide services, and to provide a conduit for prospective and existing clients to acquire Plaintiffs' professional services.
21. Plaintiff relies on client's knowledge of its proximate name and services names learned from Plaintiff's television shows and advertising. Consumers can retain or locate Plaintiff's services on the above web addresses.
22. However, Defendants' fake egregious website **www.ripoffreport.com** appear as **Search Result** on various search engines when clients input Plaintiffs' names or his professional services in a in a internet search engine, such as; **Max Antoine, Dr Max D. Antoine, or American Corporate Society**, causing clients to be exposed to Defendants' fabricated defamatory statements regarding Plaintiffs and its professional multi services and causing clients to be maliciously, conspiratorially, mistakenly



diverted to Defendants' frivolous websites when they intended to access Plaintiff's Dr. Max Antoine, Max Antoine, or the American Corporate Society's website.

23. Defendant's website [www.ripoffreport.com](http://www.ripoffreport.com) **conspiratorially** held itself out to the public as a **"world wide web consumer reporting website and publication, by clients for clients"** to file and document consumer reporting website and publication, by client for client' to frivolously create, fabricate, egregiously defame, recklessly file and conspiratorially document clients' complaints about companies or individuals who rip off consumers".
24. The Defendants encourage "clients" to complain about companies such as Plaintiff's business. Defendants' actively and conspiratorially solicit these "clients or consumers" to recklessly fabricate these frivolous negative complaints about any company that has allegedly "ripped" the consumer off even without evidentiary proofs.
25. When Defendants receive these **inflated complaints** from the clients they conspiratorially review them and maliciously select which complaints to negatively blemish, embellish, publish on their website [www.ripoffreport.com](http://www.ripoffreport.com)
26. During the selection process, Defendants recklessly include a large number of fabricated negative comments **but conspiratorially delete, erase, de-eradicate, omit**

**a large number of positive comments about positive companies** or businesses such as the Plaintiffs herein.

27. Defendants' **racketeering** and **conspiratorial** publication of these clients base complaints is with reckless, careless, and with egregious disregard and disrespect for the truth as Defendants do not obviously verify and authenticate such Complaints for accuracy, proof, and merit; rather they conspiratorially publish the selected complaints; modify, edit, supplement, and include additional defamatory language to imply that it is an established fact that the business named in such complaint is "ripping off" the clients when it is never the factual truth.
28. In addition to failing to investigate, verify that accuracy of the selected complaints, Defendants often tailor, edit, add, supplement, accrue, actively coach, and libelously re-write the complaints themselves, supplementing words such as "**rip-off**", "**con - artist**", "**faker**", "**pretender**", "**fraudster**" and "**scam**". Notwithstanding the nature of the complaint, after which Defendants would have the actual "Client" anonymously post the Complaint on Defendant's racketeering websites.
29. If a defamed company ever contacts these Defendants to immediately remove, refute, or rebut the conspiratorial negative information on Defendants' racketeering websites, Defendants then either refuse to post the said rebuttals, or step up the campaign of further renewing, and **targeting the company with supplemental defamatory and**

**retaliatory complaints to further victimize and ultimately silence such rebuttal statements.**

30. Moreover, while on Defendant's website, [www.ripoffreport.com](http://www.ripoffreport.com), actual or prospective clients can further click open on a link titled "**Rip off Revenge**" where malicious bad-faith clients are proximately directed to Defendant's second website, [www.ripoffrevenge.com](http://www.ripoffrevenge.com), on [www.ripoffrevenge.com](http://www.ripoffrevenge.com) Defendants further conspiratorially offer products and services for sale to these very same clients.
31. Defendants conspiratorially publish and libelously make available for derogatory views, approximately 4 modified, false, fake, fabricated, libelous or inflated stories about Plaintiffs, Max Antoine, Dr max D. Antoine, American Corporate Society; the frivolous contents of which the Defendants themselves largely created, solely edited, maliciously fabricated with reckless stories and negative embellishments.
32. Defendants are conspiratorially publishing the said false and defamatory materials about Plaintiff for the sole purpose about, among other targeted factors, intentionally diverting actual "hits" and attention of Internet users, readers, and viewers initially searching for Plaintiff's professional top notch services, away from Plaintiff's bona-fide websites and maliciously re-directing them to Defendants own conspiratorial websites.

33. **Defendants' malicious and racketeering diversion of Plaintiff's prospective business traffic "hits"** and their publication of conspiratorial and defamatory "Complaints" about Plaintiff with careless, egregious and reckless disregard and factual disrespect for the truth of such "Complaints" has proximately resulted in numerous to mistaken beliefs that these Plaintiffs engage in false and deceptive business practices.
34. The contrived numerosity of these complaints apparently given the remarkable appearance of legitimacy to the complaints, and the multiple complaints are absorbed by Search Engines on the Internet causing higher placements of the defamatory and conspiratorial materials on Internet Search Engines or ISE. These actions enable the defamatory materials to be viewed or read by countless numbers of Plaintiff's own existing clients and potential customers.
35. Furthermore, Defendants' conspiratorial websites are the mass profit interactive websites that advertise, market, promote, excite, generate, solicit and **receive millions of cash on-line payments from consumers nationwide**, including in New Jersey, Florida, Georgia, Washington State, Pennsylvania, and New York States. Defendants profit proximately from their web-related activity also in the State of New Jersey.
36. Defendants' website, [www.ripoffreport.com](http://www.ripoffreport.com), offers advertising, and mass marketing promotion for which advertisers have paid Defendants massive monies and their

companies' names and logos will publicly appear on Defendants' websites and negative racketeering materials.

37. Furthermore, Defendants promote, excite, market, acquire, accept and solicit Internet viewers for "donations" for the high costs and fees of providing [the] service"

38. Upon investigative information from numerous classified sources, **Defendants also earn millions of cash dollars in referral fees from class action attorneys to whom they funnel cases that are OBVIOUSLY formed out of the posting on www.ripoffreport.com**

39. Through rip-off revenge, Defendants promote and conspiratorially offer to sell customers either a service wherein Defendants will "assist victims to collect in few days or hours". Or consumers may choose to of course buy a "do it yourself guide; how to get rip-off revenge and your money back too..."

40. Consequently, Defendants stand to massively profit by continually soliciting posting like the false conspiratorial, malicious, negatively defamatory and harmful postings regarding Dr Max D. Antoine, Max Antoine, American Corporate Society that can be found on Defendant's website. **(See Exhibits # B, Copies of Defamatory Contents Posted Against the Plaintiffs by Defendants)**

41. Remarkably, Defendants were lawfully aware of the negative conspiratorial effects, and far reach of these reports on their frivolous racketeering websites- then intend this damage to occur to the Plaintiffs. The more conspiratorial negative contents on their websites, the more viewers or users will visit their websites, thus increasing financial revenues for the Defendants in the form of donations. Books sales, Referral arrangements for Unethical fees with crooked attorneys and mass advertising. (**See Exhibit # C, Formal Notice of Cease and Desist Request to these Defendants prior to this lawsuit**)
42. The more defamatory or conspiratorial negativity Defendants can illicitly muster, the more money clients in New Jersey, New York, Florida, Georgia, Washington, Pennsylvania States and Nationwide will pay these racketeering Defendants, and the more class action Plaintiffs Defendants herein can funnel to crooked unethical lawyers around the Nation and in New Jersey State.

#### **COUNT FIVE**

#### **RICO ALLEGATIONS OF PREDICATE ACTS:**

#### **THREATENED EXTORTIONS AND WIRE FRAUD**

43. This Federal Complaint is constitutionally and statutorily brought by Plaintiffs Dr. Max D. Antoine, Max Antoine, American Corporate Society for a scheme implicating extreme wire Fraud, to tremendous extortions of money in connection with the operation, daily financial activity and criminality of Defendants' conspiratorial and

fabricated shame of Consumer Advocacy Internet website, [www.ripoffreport.com](http://www.ripoffreport.com).

The financial remedy sought by Plaintiffs includes Compensatory, Punitive, Consequential, Actual, Economic, Injunctive Relief and Equitable Redress, Damages for Emotional Pain and Sufferings, Treble Damages under both State and Federal law, Financial Restitutions, Costs of suit; interests, and all relative fees.

44. Defendants intentionally, frivolously, egregiously, libelously, and conspiratorially used their two websites as an ongoing scheme to obtain tremendous money from Plaintiffs and other businesses in the Nation. Defendants remarkably did so by creating, pretending, perjuring, faking, fabricating, selling, proposing, encouraging, promoting, marketing, and conspiratorially soliciting fake defamatory contents sufficiently injurious to Plaintiffs, by requesting Plaintiffs to pay a **\$150,500 Cash Advanced Fee** and **\$3,000.00** monthly retainer for five years. (**\$1,000.00 for each defamatory statement posted on their websites against Plaintiffs, crime of conspiratorial extortion**).

45. As part of this ongoing National Scheme to Conspiratorially Extort Money, Defendants illicitly promoted, solicited, criminally developed and intentionally published defamatory materials concerning Plaintiffs; referred to on Defendants' frivolous websites "rip off reports" the "Rip Off Reports" published by Defendants are intended to subject existing clients and potential customers searching the Internet for Plaintiffs' Bona-fide top notch professional services to defamatory and

conspiratorial materials concerning Plaintiffs and its multi States' licensed Businesses.

46. In furtherance of the terroristic conspiracy and criminal scheme of threatened extortion, Defendants have solicited Plaintiffs to enroll in Defendants' "Corporate Advocacy Program" whereby the perjured, fabricated and inflated stories against Plaintiffs on Defendants' two websites would be ameliorated, and ultimately modified and edited by same Defendants to positive selling remarks. However, the fees for Plaintiffs to enroll in Defendants' shameful "**Corporate Advocacy Program**" is a fee of \$150,500.00 (Divided by the number of "Rip off Reports" posted on Defendants' racketeering websites) and a monthly retainer for five years of \$3,000.00 (\$1,000.00 multiplied by the number of "Rip off Report" posted on Defendants' two criminal extorted websites).

### COUNT SIX

#### **TERRORISTIC THREAT OF ECONOMIC LOSSES (THREATENED EXTORTION)**

47. Redressing the publication of false, extorted, conspiratorial, defamatory, and inflated stories, which Defendants allegedly created, coached, edited, fabricated, inflated, promoted, marketed, and solicited, does not statutorily give Defendants the vested constitutional or statutory right to collect conspiratorial fees from Plaintiffs.



Consequently, the Defendants' egregious Conduct as factually alleged, is more than an offer to provide services for compensation or for illegitimate fees.

48. Defendants maliciously promote, market, publish, solicit and conspiratorially create defamatory "rip-off Report" with negative misleading false, derogatory, and defamatory contents and defamatory titles, scripts, and headings created, and additionally uploaded by Defendants for massive profits detrimental to Plaintiffs.
49. Defendants will only delete, revoke, suspend, nullify, erase, demote, discourage, disallow, edit, remove or modify those inflated derogatory and defamatory reports if paid a fee of **\$150,500** and a **monthly retainer of \$3,000.00 U.S. (SEE EXHIBIT # D, COPIES OF THE CHECKS)**
50. Subsequent to receiving a **\$150,500** check, Defendants would contact these unknown or inflated users who filed "Rip-off Reports" against Plaintiffs on Defendants' false extorted and misleading websites [www.ripoffreport.com](http://www.ripoffreport.com) and offer that Plaintiffs would refund all of their money paid to Plaintiffs. Defendants would then update the Rip-off Report and its title to show that the complaint was resolved, or would forever delete and remove the said inflated defamatory stories from their entire websites as if the contents were never initially posted.
51. In further exchange for the **\$150,500 check**, Defendants would additionally include and create a link to a statement, purportedly written by Plaintiffs, explaining or

detailing the obvious steps it virtually or fictitiously took to resolve the so called complaint.

52. Plaintiffs further ascertain that Defendants would require Plaintiffs to pay a **\$3,000.00 monthly retainer for five years**, in undisputed exchanges for Defendants notifying Plaintiffs of any new eventual or fictitious complaints; and giving Plaintiffs the benefits of the doubt to amicably resolve the complaints prior to uploading any new “Rip-off Reports” against Plaintiffs to be posted on Defendants’ conspiratorial two websites.
53. In further financial disguise for the said monthly retainer of \$3,000.00, Defendants additionally pledge to always factually verify and authenticate the authenticity of any new eventual or incidental consumer complaints and allegations against the Plaintiffs, similarly to the three nationally monitoring credit reporting bureaus (**Equifax, Trans-union, and Experian**).
54. Plaintiffs also ascertain that Defendants have threatened numerous other businesses in the same manner with this Disguised scheme see e.g., Hy Cite Corp vs. Badbusinessbureau.com LLC. 297 F.Supp.2d 1154, 1156 (W.D. Wis. 2004), also Manchanda Law Offices v. Xcentric Ventures, LLC, and Ed Magedson, **No Appearance**, District Court Docket# 06-cv-6590, United States District Court For the Southern District of New York, the Case was Settled prior to Jury Trial, Cambridge Who’s Who v. Xcentric LLC., and Ed Magedson, **No Appearance**, District Court

Docket# 06-cv-6590, United States District Court for the Eastern District of New York, this lawsuit was also settled prior to Jury Trial. (Worth nothing that Defendants have always offered Plaintiffs the disguised chance to enroll them in their shameful "Corporate Advocacy Program" scheme for an initial fee of \$30,000 and an additional \$20,000 fee at a subsequent date)

55. Therefore, Defendants illegitimately run a Scam Consumer Advocacy Website, and threatened extortions of tremendous monies from Plaintiffs. Plaintiffs factually claimed flagrant violations of federal law under the Racketeer influenced & Corrupt Organization Act ("RICO") 18 U.S.C. -1961, 1970, 18 U.S.C. 1961-1968 (1994), Section 1961, Section 1962 (c), the CDA Act, 47 U.S.C. 230, the F.T.C. Anti-trust, and Anti-Business Boycotting Act, New Jersey LAD laws, New Jersey Anti-Defamation laws, et seq., Common Defamation and Unfair Competition. Plaintiffs demand immediate equitable relief of severe injunctions and numerous damages and restitutions against the said Defendants.

### **COUNT SEVEN**

#### **WIRE FRAUD**

56. Defendants intentionally used their website two websites [www.ripoffreport.com](http://www.ripoffreport.com) and [www.badbusinessbureau.com](http://www.badbusinessbureau.com) as a shameful scam to acquire tremendous money from Plaintiffs and other similarly situated businesses by means of false, derogatory,

conspiratorial, and defamatory complaints created, egregiously inflated and solicited by Defendants.

57. Defendants posted, edited, wrote, coached, fabricated, created, and unlawfully uploaded false and inflated defamatory stories and sent by e-mail and told Plaintiffs via telephone communications a request that Plaintiffs pay a \$150,500 fee and \$3,000 monthly retainer, in return for which Defendants would immediately take actions related to the defamatory materials on their fictitious racketeering websites. The said posting of inflated reports on their own conspiratorial websites and the sending of e-mails factually require transmitting writings by means of wire.

### **COUNT EIGHT**

#### **(FIRST CAUSE OF ACTION)**

#### **Injury Actionable under RICO & CDA Acts**

58. Plaintiffs re-allege and repeat each and every factual allegation contained in Paragraph One through Paragraph 57, Count One through Count Seven, against all the Defendants, as though set forth in full herein.

59. WHEREFORE, as a result of the derogatory negative materials and malicious fabrication of lies published on Defendant's website, Plaintiffs have lost thousands of actual clients, some of them have even rescinded professional service contracts with American Corporate Society, Max Antoine, and Dr Max D. Antoine; **And Plaintiffs'**

**excellent top notch professional reputation has been severely injured and irreparably tarnished.** Furthermore, Defendants' egregious conduct or tort has proximately resulted in Plaintiffs dampening business sales.

60. Consequently, and as a result of the inflated defamatory materials maliciously and conspiratorially published on Defendants websites, Plaintiffs have even been unable to conclude business transactions including long term business loans that would have resulted in a capital investment in Plaintiffs by Third party Investors of approximately \$3,000,000.00, causing Plaintiffs to obviously lose the business, the American Corporate Society; and Plaintiff Dr. Max D. Antoine has personally been unable to even further locate other suitable income base employments elsewhere to support his family who remarkably depend on him for continued survival.

61. Plaintiffs' irreparable injuries, financial harms, insolvent ruins, and ongoing damages were proximately caused by Defendants' racketeering activities and conspiratorial daily operations on the World Wide Web.

62. Plaintiffs Dr. Max Denis Antoine, Max Antoine personally, American Corporate Society have consequently and therefore no sufficient remedy and equity at law and under the law.

**COUNT NINE****(SECOND CAUSE OF ACTION)****NO IMMUNITY UNDER THE COMMUNICATIONS DECENCY ACT (CDA)**

63. Plaintiffs repeat and re-allege each and every factual allegation contained in Paragraph One through Paragraph 62, Count One through Count Eight, against all the Defendants, as though set forth in full herein.
64. The instant claims of Plaintiffs are not lawfully barred by the Communication Decency Act (CDA) 47 U.S.C 230, and the RICO Act et seq; because Defendants are responsible for the creation, adding, writing, financing, racketeering or development of information “provided by individuals submitting Rip-off in response to Defendants’ racketeering solicitation.
65. Defendants are nevertheless Information Contents Providers (I.C.P) regarding their websites defamatory postings. Upon investigative information and classified beliefs, Defendants have also created fictional complaints, inflated stories and rebuttals themselves, which are then attributed to people with false names, or “anonymous” titles from fictional and remote base locations around the United States, despite knowing that such reports are false, defamatory, derogatory, malicious, and conspiratorially slanderous.

66. Furthermore, Defendants create, edit, add, prepare, draft, compose, and submit headings, report titles, and upload messages for most of their web reports or false perjured stories. **Defendant Ed Magedson is actually a Pioneer and an Expert** in doing these sorts of things according to numerous statements given under oath by his own former employees. Copies of these deposition statements are ready to be used against Defendants at trial.

67. Therefore and as a matter of law, Defendants are not entitled to immunity under the CDA or the RICO Acts in this instant federal cause of action. Defendants are lawfully bared by any statutory immunity defense including summary judgments.

### **COUNT TEN**

#### **THIRD CAUSE OF ACTION**

#### **(Racketeer Influenced and Corrupt Organization).**

68. Plaintiffs repeat and re-allege each and every claim of their factual allegations contained within Paragraph 1, Count One, through Paragraph 67 and Count Nine, as though set forth in full herein.

69. This has of course been a federal cause of action brought by the above Plaintiffs under the Organized Crime Control Act of 1970, Racketeer Influenced and Corrupt Organization, 18 U.S.C. 1961 ET seq, **The Civil Right Act of 1964 as enforced by**

**the E.E.O.C.**, the New Jersey **LAD laws**, the New Jersey Anti-Defamation Act, and the **federal CDA Act** as codified under 47 U.S.C. 230, et seq;

- A) Racketeering with others to commit fraud upon Plaintiffs
- B) Racketeering with others to commit libelous defamation
- C) Racketeering with others to commit bribery
- D) Racketeering with others to restrict competition
- E) Racketeering with others to commit financial extortions
- F) Racketeering with others to commit individual harms
- G) Racketeering with others to commit irreparable injuries
- H) Racketeering with others to boycott Plaintiffs business
- I) Attribution with others to commit **malicious prosecutions**
- J) Racketeering with others to force Plaintiffs out of business, and to bankruptcy
- K) Racketeering with others to tarnish Plaintiffs' **bona-fide reputation** using the world wide web
- L) Racketeering with others to publish false **INFLATED stories** about other individuals and bona-fide businesses
- M) Racketeering with others to commit the act of malice, perjury and libel
- N) Racketeering with others to massively profit from the said unlawful acts  
**(Being detrimental to others)**
- O) Racketeering with others to commit harmful schemes and financial scams and disaster to the Plaintiffs



- P) Racketeering with others to violate the Plaintiff's 1964 Civil rights as to obtain and secure meaningful employments elsewhere and further support his family
- Q) Racketeering with others to violate Plaintiffs' constitutional and statutory rights to privacy as vested under the federal Privacy Act of 1970
- R) Racketeering with others to violate the Plaintiffs' First Amendment rights under the United States Constitution
- S) Racketeering with others to commit conspiratorial persecutions, and judicial oppressions to Plaintiffs.

70. The Plaintiff Dr Max D. Antoine, or Max Antoine is a physical "person" within the meaning of 18 U.S.C 1961 (3) and 1964 (c), and American Corporate Society is a physical business entity, legally **invisible** and **indivisible**.

71. Every individual Defendant herein is a physical "**person**" or a physical corporate base entity within the meaning of 18 U.S.C 1961 (3) and 1962 (c) and (d), et seq.

72. Xcentric Ventures L.L.C. is of course and remarkably a corporate base "**Criminal Enterprise**" within the accurate or undisputed meaning of 18 U.S.C 1961 (4) and 1962 (c), et seq.

73. Every individual or joint Defendant conducted and participated by, or has duly been associated with a criminal enterprise, that is, of course, **Xcentric Ventures, LLC**, criminally engaged in the daily operations of which affected foreign and interstate business commerce, within the meaning of 18 U.S.C 1962 (c) of the United States of America.

74. Every Defendant or joint Defendant conduct or participated, proximately or indirectly, in the egregious conduct of the enterprise's criminal business affairs, and maliciously conspired with others to **profitably** do so, through a daily pattern of criminal racketeering activity within the meaning of 18 U.S.C – 1961(5), that is, wire fraud in violation of 18 U.S.C-1341 of the United States of America. Consequently Plaintiffs demand judgments against the Defendants.

### **COUNT ELEVEN**

#### **(FOURTH CAUSE OF ACTION)**

#### **NO IMMUNITY UNDER THE CDA ACT AND THE CIVIL RIGHTS**

#### **ACT OF 1964**

75. Plaintiffs repeat and re-allege each and every factual allegation claimed in Paragraph 1 through Paragraph 74, Count One through Count Ten, against all the Defendants as though set forth in full herein.

76. The Plaintiffs' factual claims are not statutorily barred by the Communication Decency Act (CDA) 47 U.S.C 230, and the Civil rights Act of 1964, because Defendants are statutorily responsible for the creation, writing, editing, inventing, adding, drafting, promoting, marketing, encouraging, uploading, tarnishing, blemishing or development of information "conspiratorially provided by individuals submitting Rip-off in response to Defendants' massive solicitation, and advertising campaigns.
77. Defendants are information content providers (ICP) with respect to their websites inflated postings. Upon investigative information and classified beliefs, Defendants further create fictional, defamatory, derogatory and frivolous complaints themselves, which are then attributed to people with false names or "anonymous" titles from fictional and remote locations around the United States and the Globe, despite knowing that such complaints are slanderously false and conspiratorial in nature.
78. Consequently, Defendants create, draft, fabricate, upload, falsify, forge, write, edit, eradicate the said headings, report the said titles, and derogatory messages for their defamatory reports and ongoing complaints.
79. Accordingly, Defendants are not lawfully entitled to any immunity under the CDA Act or the Civil Rights Act of 1964 et seq., in this pressing lawsuit. Consequently Plaintiffs demand judgment against the Defendants.

**COUNT TWELVE**

**FIFTH CAUSE OF ACTION**

**(Defamation Per se of Business Reputation)**

80. Plaintiffs re-allege and re-aver Paragraph 1 through 79, Count One through Count Eleven of their factual allegations against all the Defendants as if fully set forth herein.
81. Defendant's websites were edited, created, promoted, drafted, modified, updated, uploaded by Defendants for commercial and financial gains and thus the selected stories conspiratorially published by Defendants are designed to entice and force clients to purchase Defendants products, services and advertising defamatory opportunities.
82. The stories and headlines published by Defendants regarding Plaintiffs are false and were maliciously published with malice and reckless disregard for the factual truth or falsity of such inflated stories, with the sole intent to injure Plaintiffs, its business bona-fide reputation and to further illegally divert customers away from Plaintiffs.
83. The tarnishing stories and inflated headlines slanderously published by Defendants contain false fabricated information about specific services (**Immigration Service**) provided by the Plaintiffs, specifically claiming, **inter alia**,

- a) "ACS" immigration rip off, promised refunds, scam New Jersey residents  
 \*UPDATE ... still waiting on refund!  
<http://www.ripoffreport.com/Search/max-antoine.aspx>,<http://www.ripoffreport.com/Search/americancorporatesociety.aspx>, Rip-off report numbers 302 997, 179 751, and 179 987
- b) "Max Antoine Deceptive and Fraudulent Claims Bloomfield New Jersey, Max Antoine, Report No. 302 997 Con Artists: Max Antoine New Jersey 1/19/2010 author: South Hackensack, New Jersey 02/19/2008 Max Antoine is not a con man, he is a lunatic".
- c) "1/19/2010 time 2:39pm Max Antoine DBA American Corporate Society fraudulently obtained my \$3,000.00 under false pretexts that he was an attorney rip-off Bloomfield New Jersey \*Consumer comment...to Wilmore Author: Pickerington, Ohio".
- d) "Want to sue Rip-off Report? Do you really want to sue Rip-off Report? Want to sue Rip-off Report? **You should read this information before filing a lawsuit against Rip-off Report or the Founder Edward Magedson.**  
[www.ripoffreport.com/wantToSueRipoffReport.asp](http://www.ripoffreport.com/wantToSueRipoffReport.asp)".

84. The above false defamatory statements of fact published on Defendants' websites are conspiratorially unambiguous and when read and motivated by Internet users, readers or viewers searching for Plaintiffs' bona-fide professional services, the libelous nature of such Statement is clean.
85. As a direct and proximate result of Defendants false publication of the defamatory information, **Defendants have inflicted immeasurable damage and irreparable injuries** upon Plaintiffs' business and professional reputation, human character, including, but not limited to loss of significant profits, loss of income, loss of ongoing businesses, and loss of goodwill.
86. As Plaintiffs' principal place of business is located in New Jersey, the bulk of the irreparable damages or injuries to Plaintiffs' business and professional reputation has thus occurred in the state of New Jersey, and also in the **States of Florida, Georgia, Pennsylvania, Ohio, Washington, New York, Haiti, France, Colombia, and Jamaica** where most of the Plaintiffs' actual clients live or continue to reside.
87. Defendant's defamatory and racketeering statements have, at all times material hereto, been proximately directed and continue to be directed to residents of the above States and Countries. Therefore, Plaintiffs demand immediate judgments against all the Defendants with or without prejudice.

**COUNT THIRTEEN****(SIXTH CAUSE OF ACTION)****Unfair Competition**

88. Plaintiffs re-allege and re-aver Paragraphs 1 through 87, Count One through Count Twelve, against all the Defendants as if fully set forth herein.
89. Defendants' web sites contain false fabricated and also misleading representations concerning Plaintiffs' professional bona-fide business and character that are likely to be commercially detriment of Plaintiff's profits or success.
90. Defendants have failed and refused to cease and desist from publishing the said false, defamatory and inflammatory statements on their criminal websites and engaging in the acts described above in this cause of action. Although Plaintiffs have demanded they do so, unless enjoined by the Court from doing so, Defendants will continue this criminal activity and cause Plaintiffs and other similarly situated businesses further irreparable harms and injury.

**WHEREFORE**, Plaintiffs Dr. Max D. Antoine, Max Antoine and American Corporate Society demand immediate Judgments and irreparable Damages as follows:

- (I) On the First Cause of Action for **RICO** and the **CDA violations** a judgment of treble damages, compensatory damages, with costs in amount of at \$33,000,000.
- (II) On the Second Cause of Action for **CDA violations** a judgment of treble, compensatory damages with costs in the amount of \$33,000,000.
- (III) On the Third Cause of Action for violations of the **RICO Act** and the **Civil Rights Employment Act** a judgment of treble, compensatory damages with costs in the amount of at least \$20,000,000 and a **federal Court Order permanently enjoining Defendants** from further publishing the said Racketeering, inflammatory and defamatory statements on their criminal websites;
- (IV) On the Fourth Cause of Action for violations of the **CDA Act** and the **Civil Rights Employment Act** a judgment of treble, compensatory damages with costs in the amount of at least \$20,000,000 and a federal Court Order permanently enjoining and restraining Defendants **from publishing the said**



**false Racketeering, inflammatory and defamatory statements on their criminal websites; and**

- (V) On the 5<sup>th</sup> and 6<sup>th</sup> Causes of Action for **Defamation per se of Business reputation, Personal reputation, and Unfair competition** a judgment with costs in the amount of at least \$33,000,000 and a federal Court Order permanently restraining and enjoining Defendants from publishing the said false Racketeering, inflammatory, and defamatory statements on their criminal websites; and
- (VI) A judgment of at least \$33,333,333 with costs and financial Restitutions for Punitive damages, compensatory damages, damages for psychological pain and emotional sufferings, damages for ongoing humiliations on the world wide web, damages for socio-phobia, damages for intimidations among Plaintiffs' own professional peers, damages for criminalizing the Plaintiffs, damages for loss of businesses, loss of income, loss of employment, loss of profits, and for the Plaintiffs' irreparable financial ruins.
- (VII) A federal Court Order immediately compelling the Defendants to **forever** retract, erase, delete, prevent and remove the Said publishing, tarnishing, blemishing, defamatory, and inflammatory statements from their criminal websites with prejudice;

(VIII) Such **supplemental and further relief** as the District Court shall deem just, proper and equitable to the Plaintiffs.

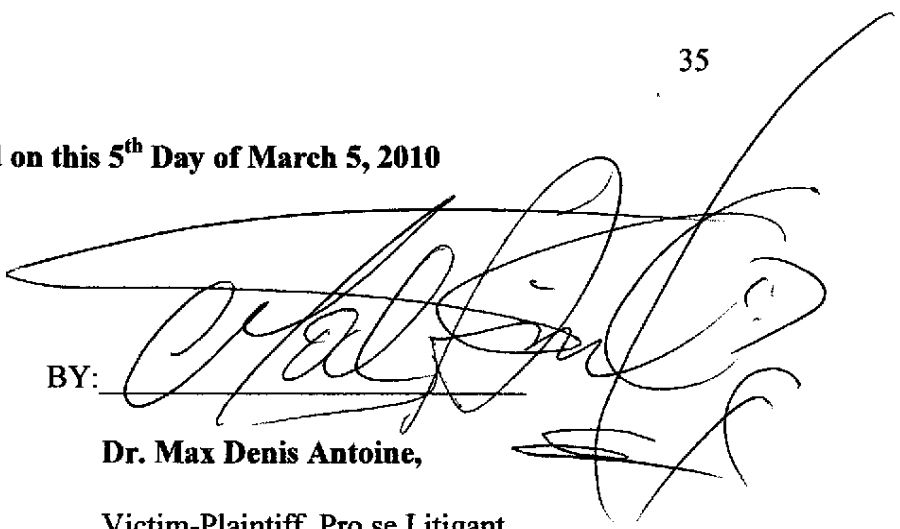
**“JURY TRIAL & JURY DEMAND”**

**PLAINTIFFS Dr. Max D. Antoine, Max Antoine, and American Corporate Society** herein hereby demand a speedy civil trial by federal jury on all the facts and violations statutorily alleged under color of both State and Federal law in the within cause of Action.

**COMPLAINT VERIFICATION**

I Dr. Max Denis Antoine, declare under Penalty of perjury under the laws of the State of New Jersey, that I am of course the managing member of American Corporate Society, a professional Limited Liability Company, **State registered under the New Jersey Secretary of State, and federally authorized under DHS, IRS, FCC and FTC,** to duly provide limited professional services in the State of New Jersey. That the information factually alleged in the foregoing Complaint is lawfully true, and factually accurate to the best of my proximate knowledge, and investigative belief, and that I am constitutionally authorized as a pro se litigant to make this Verification on behalf of myself or the Plaintiffs.

**Prepared and Submitted on this 5<sup>th</sup> Day of March 5, 2010**

A large, stylized handwritten signature in black ink, written over a horizontal line. The signature is highly cursive and difficult to decipher, but it appears to be the name of the signatory.

BY:

**Dr. Max Denis Antoine,**

**Victim-Plaintiff, Pro se Litigant**

**New Jersey State:**

