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1/20/15 9:35 am
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Attorneys for Plaintiff

SUPERIOR COURT OF ARIZONA
COUNTY OF MARICOPA

XCENTRIC VENTURES, LLC, an
Arizona limited liability company,

Plaintiff,

v.

MICHAEL ROBERTS d/b/a
AuthorizedStatement.org; KIRILL U.
VIKTOROVICH ; A BHAR SONS,
LTD., a Seychelles corporation d/b/a
badforpeople.org; COMMON
DECENCY, INC., an Iowa corporation,

Defendants.

Case No. CV2013-012936

DEFAULT JUDGMENT

This matter having come on regularly before the Court sitting without a jury, the Plaintiff appearing by and through its attorneys, Jaburg & Wilk, P.C., by Maria Crimi Speth, the Defendant Kirill U. Viktorovich appearing neither in person nor by counsel, and it appearing to the Court that the Defendants were duly served with a Summons and First Amended Complaint, that the time allowed by law having expired and no appearance or answer having been made and default having been entered against Defendant Viktorovich;

1 THE COURT HEREBY FINDS that:

2 1. Plaintiff Xcentric Ventures, LLC operates Ripoffreport.com (“Ripoff
3 Report”);

4 2. Defendant Kirill U. Viktorovich is the registrant of www.scamgroup.com
5 (“Scamgroup.com”);

6 3. Scamgroup.com is populated with fictitious reviews about Ripoff Report’s
7 customers (the “Defamatory Content”);

8 4. Scamgroup.com was created for the purpose of interfering with Ripoff
9 Report’s contracts and business expectancies;

10 A. The Scamgroup.com website boasts a large banner on its homepage
11 that inquires, “Paying Ripoff Report to hide negative reviews?” which then flashes to
12 “We will Hunt you Down and Destroy your Business!” See www.scamgroup.com.

13 B. Virtually every business “reviewed” on Scamgroup.com is a
14 customer of Ripoff Report or associated with Ripoff Report .

15 C. Scamgroup.com warns customers and potential customers of
16 Ripoff Report: “Remember! No money should be ever paid to Ripoff Report, or your
17 business will be completely DESTROYED!!!” See
18 <http://www.scamgroup.com/business-demolition>.

19 5. The Defamatory Content on Scamgroup.com are false and fake reviews.

20 6. As a result of this improper interference with Plaintiff’s contracts and
21 business expectancies through the Defamatory Content, Plaintiff has expended
22 considerable time and resources to retain customers and advertisers victimized by the
23 scheme.

24 7. As a result of this improper interference with Plaintiff’s contracts and
25 business expectancies through the Defamatory Content, Plaintiff has been damaged.

26

1 IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that Judgment
2 be entered in favor of Plaintiff Xcentric Ventures, LLC, and individually against
3 Defendant Kirill U. Viktorovich as follows:

4 ~~A. For actual damages in the amount of \$ _____.~~

5 ~~B. For punitive damages in the amount of \$ _____.~~

6 C. For declaratory judgment that the Defamatory Content, listed in
7 Exhibit A and posted on Scamgroup.com, is, in fact false and defamatory and was
8 posted for the purpose of interfering with Xcentric Ventures' contracts and business
9 expectancies;

10 D. For injunctive relief enjoining Defendant Viktorovich from
11 contacting, harassing, defaming, and/or threatening Plaintiff Xcentric Ventures'
12 customers and advertisers;

13 E. For an order that Defendant Viktorovich immediately remove from
14 publication on the internet all Defamatory Content appearing on Scamgroup.com;

15 F. For Plaintiff Xcentric Ventures, LLC's attorneys' fees and costs
16 incurred herein; and

17 G. For interest on Plaintiff Xcentric Ventures, LLC's attorneys' fees
18 and costs at the legal rate of 4.25% per annum from the date of this Judgment until paid
19 in full.

20 IT IS FURTHER ORDERED that the Plaintiff may submit this Judgment to
21 Google, Yahoo, Bing, or any other Internet search engine to have the Defamatory
22 Content removed from that search engine's results. The Plaintiff may submit this
23 Judgment to any Internet Service Provider to cause the Defamatory Content to be
24 removed or otherwise de-indexed at any time nor or in the future;

25 IT IS FURTHER ORDERED that if Scamgroup.com changes the URLs which
26 contain the Defamatory Content to circumvent this Judgment, Plaintiff may modify

JABURG WILK
Attorneys at Law

1 Exhibit A to reflect the new URL(s) which contain the Defamatory Content and
2 resubmit this Judgment to the Internet search engines;

3 IT IS FURTHER ORDERED that this judgment resolves all claims as to
4 Defendant Viktorovich only. Claims against Michael Roberts d/b/a
5 AuthorizedStatement.org; A Bhar Sons, Ltd., a Seychelles corporation d/b/a
6 badforpeople.org; and Common Decency, Inc., an Iowa corporation remain to be
7 adjudicated. There being no just reason for delay, this Judgment shall be entered as a
8 final order pursuant to the provisions of the Arizona Rule of Civil Procedure 54(b).

9 DATED this 20 day of January, 2015

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13 Honorable James Morrow
Commissioner, Maricopa County Superior Court

14 *None of the factual findings in this*
15 *Default Judgment are meant to be*
16 *binding against any other*
17 *defendants.*
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EXHIBIT A

1. <http://www.scamgroup.com/100/west-coast-funding-and-real-estate-services-inc>
2. <http://www.scamgroup.com/101/tmp-nevada-and-crush-llc>
3. <http://www.scamgroup.com/102/freedom-debt-relief>
4. <http://www.scamgroup.com/103/mortgage-investors-corporation>
5. <http://www.scamgroup.com/104/dean-graziosi>
6. <http://www.scamgroup.com/104/dean-graziosi>
7. <http://www.scamgroup.com/106/resort-ownership>
8. <http://www.scamgroup.com/107/medpro-inc>
9. <http://www.scamgroup.com/108/american-business-systems-llc>
10. <http://www.scamgroup.com/109/viaviente>
11. <http://www.scamgroup.com/110/vehiclehistory-com>
12. <http://www.scamgroup.com/111/off-lease-only>
13. <http://www.scamgroup.com/115/zophin-agency-and-american-income-life>
14. <http://www.scamgroup.com/116/people-helping-people>
15. <http://www.scamgroup.com/117/lexicon-senior-healthcare>
16. <http://www.scamgroup.com/118/rue-educational-publishers>
17. <http://www.scamgroup.com/119/marko-rubel>
18. <http://www.scamgroup.com/119/marko-rubel>
19. <http://www.scamgroup.com/120/skw-central>
20. <http://www.scamgroup.com/121/automotive-training-institute>
21. <http://www.scamgroup.com/122/j-t-foxx>
22. <http://www.scamgroup.com/122/j-t-foxx>
23. <http://www.scamgroup.com/123/strategic-tax-advisors>
24. <http://www.scamgroup.com/125/a-1-air>
25. <http://www.scamgroup.com/126/c-amp-r-boger-construction>

26. <http://www.scamgroup.com/127/altig-international>
27. <http://www.scamgroup.com/128/sito-marketing-and-rylo-products>
28. <http://www.scamgroup.com/129/quorum-productions>
29. <http://www.scamgroup.com/130/goldline-international>
30. <http://www.scamgroup.com/131/eas-technologies>
31. <http://www.scamgroup.com/132/david-weinstein>
32. <http://www.scamgroup.com/133/mike-moreno-and-medpro-inc>
33. <http://www.scamgroup.com/134/taylor-wingate>
34. <http://www.scamgroup.com/135/prosper-inc>
35. <http://www.scamgroup.com/136/hycite-and-royal-prestige>
36. <http://www.scamgroup.com/137/netbrands-media-corp>
37. <http://www.scamgroup.com/137/netbrands-media-corp>
38. <http://www.scamgroup.com/138/1-800-vending>
39. <http://www.scamgroup.com/139/nmr>
40. <http://www.scamgroup.com/140/playbackclothing-com>
41. <http://www.scamgroup.com/143/endeavor-telecom>
42. <http://www.scamgroup.com/143/endeavor-telecom>
43. <http://www.scamgroup.com/144/u-s-beef>
44. <http://www.scamgroup.com/145/united-surplus-buyers>
45. <http://www.scamgroup.com/146/simplastics>
46. <http://www.scamgroup.com/148/merchant-first>
47. <http://www.scamgroup.com/149/merchant-growth-capital>
48. <http://www.scamgroup.com/15/dr-jay-calvert>
49. <http://www.scamgroup.com/15/dr-jay-calvert>
50. <http://www.scamgroup.com/150/the-business-finance-store>
51. <http://www.scamgroup.com/151/pivotal-payments>
52. <http://www.scamgroup.com/152/vanguard-funding>

53. <http://www.scamgroup.com/153/true-build-credit>
54. <http://www.scamgroup.com/154/lucas-car-care>
55. <http://www.scamgroup.com/155/omni-tech-support>
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59. <http://www.scamgroup.com/155/omni-tech-support/page/4>
60. <http://www.scamgroup.com/155/omni-tech-support/page/5>
61. <http://www.scamgroup.com/155/omni-tech-support/page/6>
62. <http://www.scamgroup.com/156/pmi>
63. <http://www.scamgroup.com/157/international-profit-associates>
64. <http://www.scamgroup.com/158/arise-virtual-solutions>
65. <http://www.scamgroup.com/159/philip-x-tirone>
66. <http://www.scamgroup.com/16/michael-moreno-medpro-lasers>
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68. <http://www.scamgroup.com/160/the-business-finance-store>
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82. <http://www.scamgroup.com/168/stewart-cooper-amp-coon-inc>
83. <http://www.scamgroup.com/169/lucas-car-care>
84. <http://www.scamgroup.com/17/dr-sherri-worth>
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121. <http://www.scamgroup.com/221/platinum-web-training>
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152. <http://www.scamgroup.com/258/the-haworth-institute>
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165. <http://www.scamgroup.com/28/cartvertising-rtui-registered-tapes-unlimited>
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168. <http://www.scamgroup.com/31/clary-solar>
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182. <http://www.scamgroup.com/48/vivint>
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200. <http://www.scamgroup.com/64/lexicon-senior-healthcare>
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204. <http://www.scamgroup.com/78/zophin-agency>
205. <http://www.scamgroup.com/80/oil-field-finder>
206. <http://www.scamgroup.com/84/home-equity-lending-inc-and-daniel-peterson>
207. <http://www.scamgroup.com/85/profitgrabber-marko-rubel>
208. <http://www.scamgroup.com/86/out-estate-investments>
209. <http://www.scamgroup.com/87/reliance-first-capital>
210. <http://www.scamgroup.com/88/primerica>
211. <http://www.scamgroup.com/89/pleasant-valley-mortgage>
212. <http://www.scamgroup.com/91/emily-s-rentals>

213. <http://www.scamgroup.com/92/property-direct-usa>
214. <http://www.scamgroup.com/93/wei-mortgage>
215. <http://www.scamgroup.com/94/epay>
216. <http://www.scamgroup.com/95/dr-jay-calvert>
217. <http://www.scamgroup.com/96/dr-sherri-worth>
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233. <http://www.scamgroup.com/214/gw-equity-and-generational-equity>
234. <http://www.scamgroup.com/202/vanguard-funding-llc>