

CIVIL COVER SHEET

Clark County, Nevada

Case No.

(Assigned by Clerk's Office)

A- 14- 698267- C

XXX

I. Party Information

Plaintiff(s) (name/address/phone): Opinion Corporation, a New York Corporation, d/b/a Pissed Consumer, 111 Eighth Avenue, New York, NY 10011.

Defendant(s) (name/address/phone): Nevada Corporate Headquarters, Inc., 101 Convention Center Drive, Suite 700, Las Vegas, NV 89109

Phone: (702) 873-3488

Attorney (name/address/phone): Marc J. Bandazza and J. Mahmud Devoy, Randazza Legal Group, 3625 S. Town Center Drive, Suite 150, Las Vegas NV 89135

Attorney (name/address/phone): Kurt Harris, Harris Law Office, 10120 S. Eastern Avenue, Suite 204, Henderson, NV 89052

Phone: (702) 420-2001

Phone: (702) 492-4909

II. Nature of Controversy (Please check applicable bold category and applicable subcategory, if appropriate)

Arbitration Requested

Civil Cases

Grid for Civil Cases with categories: Real Property, Torts, Negligence, and Product Liability. Includes checkboxes for various subcategories like Landlord/Tenant, Negligence - Auto, and Product Liability.

Grid for Probate and Other Civil Filing Types. Includes checkboxes for Summary Administration, Construction Defect, Breach of Contract, and Appeal from Lower Court.

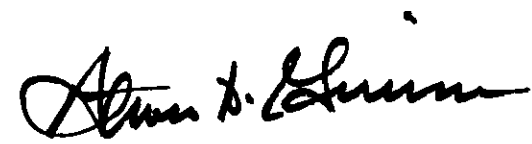
III. Business Court Requested (Please check applicable category; for Clark or Washoe Counties only.)

Grid for Business Court Requested with categories: NRS Chapters 78-88, Investments, Enhanced Case Mgmt/Business, etc.

3/26/2014

Date

Signature of initiating party or representative



CLERK OF THE COURT

COMP

Marc J. Randazza (Nevada Bar No. 12265)
J. Malcolm Devoy IV (Nevada Bar No. 11950)
RANDAZZA LEGAL GROUP
3625 S. Town Center Drive, Suite 150
Las Vegas, NV 89135
Telephone: 888-667-1113
Fax: 305-437-7662
ecf@randazza.com

Counsel for Plaintiff

**IN THE DISTRICT COURT
FOR THE STATE OF NEVADA, COUNTY OF CLARK
EIGHTH JUDICIAL DISTRICT**

OPINION CORPORATION., a New York
corporation, d/b/a PISSED CONSUMER,

Plaintiff,

vs.

NEVADA CORPORATE HEADQUARTERS,
INC., a Nevada corporation,

Defendant.

Case No.: A- 14 - 698267 - C

Dept. No.: XXX

**PLAINTIFF'S INITIAL COMPLAINT
FOR**

- **DAMAGES PURSUANT TO
N.R.S. 41.670**
- **ABUSE OF PROCESS**

**ARBITRATION EXEMPTION
REQUESTED: DEMAND IN
EXCESS OF \$50,000.00**

PLAINTIFF'S INITIAL COMPLAINT

Plaintiff OPINION CORPORATION brings this Complaint against Defendant NEVADA CORPORATE HEADQUARTERS, INCORPORATED, and alleges as follows:

I. INTRODUCTION

Plaintiff Opinion Corporation ("Opinion Corp.") is a consumer review service that provides a forum for consumers to post their experiences, good and bad, about companies with whom other consumers may do business. Defendant Nevada Corporate Headquarters, Inc. ("NVCHQ") has engaged in an apparent campaign to scrub consumer review sites of any negative reviews by filing baseless lawsuits against the consumer review sites. NVCHQ does this in the

1 hopes of intimidating consumer review sites or otherwise suppressing their First Amendment rights
2 by confronting them with a choice between removing only negative reviews of their services or
3 facing legal bills for defending the integrity of its review site.

4 NVCHQ has filed at least two of these suits in the past, and as a result was well-educated
5 on the fact that these kinds of consumer review sites are fully protected under 47 U.S.C. § 230.
6 Despite this actual knowledge of the fact that its cases were legally and factually unsupportable,
7 NVCHQ still filed a strategic lawsuit against public participation, a “SLAPP” suit, against Opinion
8 Corp. in order to improperly suppress negative reviews of its business. (*See* Justice Court
9 Complaint, attached as Exhibit A)

11 Opinion Corp. moved to dismiss NVCHQ’s lawsuit under the Nevada Anti-SLAPP statute.
12 (*See* Plaintiff’s Special Motion to Dismiss, attached as Exhibit B) Predictably, Opinion Corp.
13 prevailed on this motion. (*See See* Referee’s Findings, attached as Exhibit C) However, since the
14 matter was brought in small claims court, the small claims judge determined that she did not have
15 jurisdiction to award attorneys’ fees as provided for in N.R.S 41.670, but she did not deny the
16 attorneys’ fee award on its merits. Under the Nevada Anti-SLAPP statute, an award of attorneys’
17 fees and costs to a successful movant is mandatory.

19 N.R.S 41.670 provides relief to the victims of SLAPP suits both through a special motion
20 to dismiss and, to deal with situations like the one at hand, it also provides for a positive cause of
21 action against plaintiffs who file SLAPP suits. Since the applicability of N.R.S 41.670 and 47 U.S.C.
22 § 230 to Plaintiff has already been determined, the entitlement to damages under N.R.S 41.670 is
23 already determined.

25 Opinion Corp. has a right to be made whole after expending significant fees to dispense
26 with the meritless SLAPP suit, which NVCHQ knew full well was meritless. However, this
27 litigation is not entirely about the fees incurred, but is also about manifesting this state’s clear public
28

1 policy against SLAPP suits, and deterring NVCHQ from filing similar baseless SLAPP suits in the
2 future. Merely losing these cases has not been a sufficient deterrent for NVCHQ. NVCHQ must
3 be made to account for the damage it caused despite possessing actual knowledge that Opinion
4 Corp. had no liability. NVCHQ should be publicly rebuked with a judgment in Opinion Corp's
5 favor, lest NVCHQ and other similar censorious parties operate under the mistaken impression
6 that there are no consequences for filing SLAPP suits, as long as they are filed in small claims court.
7

8 **II. THE PARTIES**

9 1. Plaintiff Opinion Corporation operates a website entitled <pissedconsumer.com>,
10 an online forum where consumers discuss their experiences with products and services to warn
11 other consumers of negative experiences, and where consumers may also report positive
12 experiences.
13

14 2. Plaintiff is incorporated in the state of New York. Plaintiff's address is 111 Eighth
15 Avenue, New York, NY 10011.

16 3. Plaintiff is informed and believes that Defendant Nevada Corporate Headquarters is
17 a business that advertises services offering asset protection and reduced tax exposure by helping
18 customers incorporate in Nevada.
19

20 4. Defendant is a corporation incorporated in the state of Nevada, and whose primary
21 place of business is Nevada. Defendant's address is 101 Convention Center Drive, Suite 700, Las
22 Vegas, NV 89109.

23 **III. JURISDICTION AND VENUE**

24 5. This Court has jurisdiction over this matter because Defendant NVCHQ is located
25 in and conducts business in Nevada.
26
27
28

1 6. Moreover, the events giving rise to the causes of action alleged herein took place in
2 Nevada; namely, NVCHQ pursued a claim in Justice Court, based on Plaintiff's protected speech,
3 that NVCHQ knew to be groundless.

4 7. The amount in controversy, represented by actual and consequential damages to
5 Plaintiff, and possible punitive damages, exceeds \$10,000.00. This Court therefore has jurisdiction
6 over this matter.

8 8. Venue is proper before this Court, as Defendant resides in this county.

9 **IV. FACTS RELEVANT TO ALL CLAIMS**

10 9. On October 9, 2013, Defendant filed a claim against Plaintiff in the Justice Court,
11 Las Vegas Township, Clark County, Nevada, alleging damages for defamation, business
12 disparagement, false light, and civil extortion. (*See* Exhibit A) The complaint also sought an
13 unlawful prior restraint of speech by seeking removal of content posted by users of
14 <pissedconsumer.com> from said website. (*Id.*)

16 10. The underlying basis for these claims was content posted by users of the website
17 <pissedconsumer.com> that was critical of Defendant. (*Id.*)

18 11. Plaintiff filed a Special Motion To Dismiss Defendant's claims with prejudice,
19 pursuant to N.R.S. 41.660(a)(1) on December 16, 2013. (*See* Exhibit B)

21 12. The Justice Court granted plaintiff's Special Motion To Dismiss on January 22, 2014.
22 (*See* Exhibit C) The court explicitly found that Plaintiff was entitled to immunity from these claims
23 under 47 U.S.C. § 230, and that attorneys' fees were not recoverable in small claims court. (*Id.*)

24 13. Defendant brought the Justice Court action against Plaintiff despite having brought
25 identical claims in the same court against Xcentric Ventures, LLC a/k/a Ripoff Report on April 9,
26 2013. (*See* Ripoff Report Complaint, attached as Exhibit D) The underlying basis for NVCHQ's
27 claims against Ripoff Report was identical to its original action against Plaintiff. (*See Id.*)
28

1 14. Defendant’s claims against Ripoff Report were dismissed with prejudice. (*See Ripoff*
2 *Report* Referee’s Findings, attached as Exhibit E) The Referee in his findings of fact and
3 conclusions of law determined that, based on *federal law*, i.e., 47 U.S.C. § 230, Ripoff Report had
4 immunity from Defendant’s claims. (*See Id.*; *See also* Xcentric Ventures LLC’s Motion to Dismiss at
5 ¶3, attached as Exhibit F (arguing that NVCHQ’s “allegations are not sufficient to state a claim
6 because pursuant to federal law, specifically . . . 47 U.S.C. § 230(c)(1), Xcentric is absolutely
7 immune from any/all claims that arise from the publication of content from third parties.”))
8

9 **V. FIRST CLAIM FOR RELIEF:**

10 **ANTI-SLAPP ACTION PURSUANT TO N.R.S. 41.670(1)(C)**

11 15. Plaintiff repeats and realleges each and every allegation of the Complaint as if herein
12 again set forth in full.

13 16. Defendant brought its Justice Court claims against Plaintiff for the purpose of
14 stifling good faith communications made in furtherance of the right to free speech in direct
15 connection with an issue of public concern.
16

17 17. Plaintiff brought a special motion to dismiss Defendant’s Justice Court claims under
18 N.R.S. 41.660.
19

20 18. The Justice Court granted the Anti-SLAPP motion.

21 19. Under N.R.S. 41.670(1)(c), Plaintiff is now entitled to bring a separate cause of
22 action against Defendant based on Defendant’s Justice Court claims.

23 20. Due to Defendant’s actions in violation of Nevada’s anti-SLAPP statute, Plaintiff is
24 entitled to recover actual and consequential damages against Defendant, in an amount in excess of
25 \$10,000.00.
26

1 21. Defendant deliberately brought an action against Plaintiff it knew to be groundless
2 and in violation of N.R.S. 41.660, as evidenced by the dismissal of its earlier identical action against
3 Ripoff Report.

4 22. Even if the Defendant had not received virtually identical orders in the past, any
5 reasonable party would know, or should have known, that Opinion Corp. was immune from
6 liability.

7 23. The Defendant implicitly acknowledged that the claims were legally baseless by
8 submitting an opposition to the Anti-SLAPP motion that was devoid of even a single citation to any
9 authority. (*See* Opposition to Plaintiff's Special Motion to Dismiss, attached as Exhibit G)

10 24. At oral argument, Defendant similarly failed to present any such authority before the
11 court. (*See* Transcript of Hearing on Special Motion to Dismiss at 7-8, attached as Exhibit H)

12 25. Defendant knowingly and intentionally brought groundless claims against Plaintiff
13 for the purpose of suppressing protected speech, and Plaintiff is therefore entitled to an award of
14 punitive damages.

15 26. Because the Justice Court did not have jurisdiction to award Plaintiff attorneys' fees
16 in defending itself against Defendant's Justice Court claims, Plaintiff is entitled to recover
17 reasonable attorneys' fees incurred in that action as damages pursuant to N.R.S. 41.670.

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21 **VI. SECOND CLAIM FOR RELIEF: ABUSE OF PROCESS**

22 27. Plaintiff repeats and realleges each and every allegation of the Complaint as if herein
23 again set forth in full.

24 28. Defendant brought its Justice Court claims against Plaintiff with the ulterior motive
25 and improper purpose of attempting to eliminate protected speech critical of Defendant.

26 29. Defendant abused the Justice Court's process by serving Plaintiff with its original
27 complaint for the illegitimate purpose of attempting to stifle protected speech.
28

1 30. As a result of Defendant's conduct in bringing its initial claims for wrongful
2 purposes, Plaintiff has suffered monetary damages.

3 **VII. PRAYER FOR RELIEF**

4 31. Based upon the foregoing facts, Plaintiff requests judgment against Defendant
5 awarding the following:

6 A. For actual and consequential damages incurred by Plaintiff resulting from
7 Defendant's Justice Court claims in excess of \$10,000.00, including attorneys' fees incurred in
8 defending against Defendant's Justice Court claims;

9 B. For punitive damages, as allowed by N.R.S. 41.670, in excess of \$10,000.00;

10 C. For statutory damages of *up to* \$10,000 as authorized by N.R.S. 41.670(1)(b);

11 D. For an award of attorneys' fees and costs incurred by Plaintiff in bringing this
12 action, as provided under N.R.S 41.670(1)(c)(3); and
13

14 E. All further relief this Court deems just and proper.

15 **ARBITRATION EXEMPTION DEMAND**

16 The total of Plaintiff's claims herein, exclusive of interests and costs, which the judge
17 and/or jury is likely to award, exceeds \$50,000.00. Accordingly, it is exempt from arbitration and
18 Plaintiff demands that exemption. NEV. ARB. R. 3(A).
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Dated March 26, 2014

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RANDAZZA LEGAL GROUP
/s/ Marc J. Randazza

Marc J. Randazza
J. Malcolm Devoy

Attorneys for Plaintiff
Opinion Corporation

EXHIBIT A

JUSTICE COURT, LAS VEGAS TOWNSHIP
Clark County, Nevada

Case No. 13A003332

Name and Address of Plaintiff(s)
Nevada Corporate Headquarters/Cort Christie
101 Convention Center Drive, Suite 700
Las Vegas, Nevada 89109
(800) 508-1890
FAX: (702) 405-2465

Department No. 7

**SMALL CLAIMS
COMPLAINT**

(Plaintiff's) Telephone Number

VERSUS

Name and Address of Defendant(s)
Pissed Consumer
Media Relations
1562 First Ave #205-1942
New York, NY 10026
United States
262-674-6466

(Defendant's) Telephone Number

STATE OF NEVADA)
COUNTY OF CLARK)

I, Kurt Harris, Esq. STATE THAT Defendant owes Plaintiff the sum of \$ 750.00 for defamation, business disparagement, false light and civil extortion. Plaintiff is additionally seeking specific performance of the removal of information from a web site. Defendant owns and operates a website which has false information posted thereon. Efforts have been made by Plaintiff to have the information corrected and removed; however, Pissed Consumer requires payment to remove any information. Defendant permits the publications to be made by anonymous persons who cannot be held accountable for their false and inflammatory statements; that numerous efforts have been made to rectify the false publications and Defendant refuses; that a letter demanding payment has been sent; that Defendant(s) refuses to pay; and that Defendant(s) either currently resides, works or does business in the Las Vegas Township, County of Clark, State of Nevada.

I am requesting a court-appointed interpreter because:

I have a communications disability (deaf/blind/etc.)

I am not fluent in English and I need an interpreter for the following language: _____

* * * * *

(Signature) *Kurt Harris* (Date) October 9, 2013
Print Name Kurt Harris Attorney for Nevada Corp Headquarters

You MUST have this affidavit notarized (check on the left) or sign the unsworn declaration per NRS 53.045 (check on the right):

OR: UNSWORN DECLARATION: Per NRS 53.045

"I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct."

(Date) October 9, 2013

Kurt Harris
(Typed or printed name) KURT HARRIS

The Plaintiff(s) must serve three (3) documents: (Small Claims Complaint, Instructions to Plaintiff or Defendant, and Small Claims Answer), on each Defendant.

To the above-named DEFENDANT(S):

A SMALL CLAIMS ACTION HAS BEEN COMMENCED AGAINST YOU!

YOU ARE DIRECTED TO E-FILE (electronically file), with the Las Vegas Justice Court Clerk's Office, AN ANSWER WITHIN TWENTY (20) CALENDAR DAYS from the date of service of the Complaint. Use the attached ANSWER form. You must mail a copy of your Answer to Plaintiff(s) immediately after E-Filing your Answer with the Las Vegas Justice Court. Your failure to Answer (respond to) the Complaint within 20 calendar days may result in the Plaintiff(s) filing a Motion for Default Judgment against you. This means the Referee or Judge may grant a Judgment for the Plaintiff(s) based on the claims/allegations in the Complaint and without considering your possible defense(s) or explanation(s).

Original-File Copy-Plaintiff Copy-Defendant

LVJCVL Form -15 Revised 4/12

INSTRUCTIONS TO PLAINTIFF OR DEFENDANT

Read Carefully

1. **Before filing a Small Claims Complaint**, the PLAINTIFF must do the following:

- Send a demand letter, with return receipt requested, to the DEFENDANT. The demand letter must instruct the DEFENDANT to pay the amount due within 10 days of the date that the letter is sent, or the PLAINTIFF will file a Small Claims case against the DEFENDANT.
- Wait at least 10 days from the date the demand letter is sent before filing a Small Claims case against the DEFENDANT.
- Include a copy of the demand letter along with the signed return receipt (as proof of mailing) with the Small Claims Complaint when the Small Claims case is filed against the DEFENDANT.

If the PLAINTIFF does not follow the steps above, including filing a copy of the demand letter and proof of mailing, or waiting 10 days from the date the demand letter is sent before filing a Small Claims case, the Referee or Judge may dismiss the Small Claims case and/or impose another sanction.

2. The PLAINTIFF must file a Small Claims action in the township where the DEFENDANT currently resides, works, or does business.

3. The PLAINTIFF cannot sue in Small Claims court for more than \$7,500.00, excluding interest and costs. Payment by the losing party of the attorney's fees of the winning party is not allowed except in cases involving shoplifting.

4. The PLAINTIFF must show the complete name and address of the DEFENDANT in the caption (*Name & Address of Defendant(s)*) to ensure service on the DEFENDANT. If there are two DEFENDANTS and they reside at different addresses, the PLAINTIFF must include both addresses.

5. The PLAINTIFF may serve the DEFENDANT by licensed private process server, a disinterested third party, or the Constable. The PLAINTIFF, himself or herself, may not serve the Small Claims Complaint on the DEFENDANT. The fully completed Affidavit of Service Form must be filed immediately after the Complaint is served.

6. If a Small Claims Complaint is not served for one year after it is filed, the Judge or Clerk may dismiss the case without prejudice (this means the case may be refiled within the statute of limitations for such cases, but a new filing fee would be required).

7. The PLAINTIFF must pay court costs at the time of filing this Complaint. If a Plaintiff cannot afford the costs, he or she may apply for a fee waiver.

8. The DEFENDANT may electronically file the Answer, no later than 20 calendar days from the date of service of the Complaint, making any defense to the claim. The Defendant may electronically file the Answer, (\$3.50 charge using credit or debit card) at:

<http://wiznet.wiznet.com/clarknv>, or the Defendant may come to the Court and electronically file, for free, the original copy of the Answer. A copy of this Answer **must be mailed by U.S. Mail, first-class postage, to PLAINTIFF immediately after E-Filing the Answer with the Las Vegas Justice Court.**

9. If an Answer is filed, the Court will schedule the case for hearing/trial and will notify all parties of the date, time, and location by mail. If the DEFENDANT fails to appear for the scheduled hearing/trials, a judgment may be entered against the DEFENDANT.

10. Standard forms are supplied in order to expedite the handling of Small Claims cases. The forms are designed to cover the most common claims but are not specifically designed for any individual case.

11. If DEFENDANT believes the case should be dismissed, DEFENDANT may petition the Court to dismiss the case and must explain the reasons for the request. A Motion to Dismiss form is available for use. It is designed to cover the most common reasons for dismissal but is not specifically designed for any individual case.

12. Hearings in Small Claims cases are informal and are designed to promote fair and speedy justice. The PLAINTIFF and DEFENDANT may offer evidence, including witnesses, to support their arguments.

13. If English is not your first language and you would like someone to interpret for you during your court appearance, you are encouraged to use a volunteer language interpreter. You may ask a friend, relative, or coworker to come to court to interpret for you. Bringing your own interpreter with you is both effective and efficient and will allow you to better understand the proceedings.

14. If a court-appointed interpreter is needed for a party who does not speak English, or for a party with a communications disability, that party must file a written motion to request an interpreter, and the compensation for that interpreter shall be paid as provided by law.

15. A party incarcerated in a prison or jail or a party living outside Clark County may participate by telephone conference or video conference. The party must contact the Las Vegas Justice Court Clerk's Office in advance of the hearing/trial to make necessary arrangements.

16. **The Las Vegas Justice Court Clerks can neither give legal advice nor assist in completing Court forms. The staff of the Self-Help Center, located on the 1st floor of the Regional Justice Center, can assist in providing information and forms for people who are representing themselves in Court. If you need more detailed assistance, you should consult an attorney.**

Original-File

Copy-Plaintiff(s)

Copy-Defendant(s)

JUSTICE COURT, LAS VEGAS TOWNSHIP Clark County, Nevada	Case No. _____
Name of Plaintiff(s) _____	Department No. _____
(Plaintiff's(s) Telephone Number) _____	SMALL CLAIMS ANSWER
VERSUS	
Name of Defendant(s) _____	
(Defendant's(s) Telephone Number) _____	<input type="checkbox"/> NRS 97 (consumer debt/credit card) <input type="checkbox"/> NRS 604A (payday loans collections) <input type="checkbox"/> Nevada Department of Corrections cases involving inmates

There is no statutory filing fee for filling a Small Claims Answer. Each Defendant must file his or her own Answer and must pay any applicable E-Filing fee imposed by the Court.

PLEASE TYPE OR PRINT LEGIBLY.

Defendant's Answer to the Small Claims Complaint:

1. Are you currently a resident of the Las Vegas Township? Yes No
2. Do you currently do business in the Las Vegas Township? Yes No
3. Are you currently employed within the Las Vegas Township? Yes No

Please check the applicable box below.

- I agree that I owe the amount of money claimed by the Plaintiff(s).
- I do not agree that I owe the amount of money claimed by the Plaintiff(s), for the following reasons:

Answering Defendant's Address: _____ Phone Number: _____

Check here if you need more space. Add additional sheet(s) of paper and attach to this form with "SMALL CLAIMS ANSWER" on top.

TO DEFENDANT: Your original Answer must be filed with the Las Vegas Justice Court Clerk's Office and a copy provided to the Plaintiff(s) within 20 calendar days of service of the Complaint. Your failure to answer (respond to) the Complaint within 20 calendar days from service of the Complaint, may result in the Plaintiff filing a Motion for Default Judgment against you. This means the Referee or Judge may grant a Judgment for the Plaintiff based on the claims/allegations in the Complaint without considering your possible defense(s) or explanation(s).

You may electronically file your Answer, (\$3.50 charge) at: <http://wiznet.wiznet.com/clarknv>, or you may come to the Court and electronically file, for free, the original copy of your Answer at either:

Self-Help Center Regional Justice Center, 1 st Floor 200 Lewis Avenue, Las Vegas, NV 89155-2511	Justice Court Clerks' Office, Las Vegas Township Regional Justice Center, 2 nd Floor 200 Lewis Avenue, Las Vegas, NV 89155-2511
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Please check the applicable box below.

- In conjunction with the filing of the Answer, I am mailing a copy of the Answer to the Plaintiff(s) at the following address: _____

Both the Plaintiff(s) and Defendant(s) will be notified by mail of the date and time that the Court has scheduled this case for hearing/trial.

You MUST have this affidavit notarized (block on the left) or sign the unsworn declaration per NRS 53.045 (block on the right):

SUBSCRIBED AND SWORN to before me this _____ day of _____, 20____.

NOTARY PUBLIC in and for the
County of _____, State of _____

OR UNSWORN DECLARATION: Per NRS 53.045

"I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct."

Signature: _____
(Typed or printed name): _____
(Date): _____

EXHIBIT B

Karen Elizabeth Heron

CLERK OF THE COURT

JUSTICE COURT, LAS VEGAS TOWNSHIP
Clark County, Nevada

Case No. 13A003332

Nevada Corporate Headquarters/Cort Christie
101 Convention Center Drive, Suite 700
Las Vegas, NV 89109
(800) 508-1890
Fax: (702) 405-2465

Department No. 7

VERSUS

**SPECIAL MOTION TO
DISMISS PURSUANT TO
N.R.S. 41.660(1)(a)**

Pissed Consumer
Media Relations
1562 First Ave. #205-1942
New York, NY 10028
United States
262-674-6466

COMES NOW, the undersigned Defendant, who hereby requests that this case be dismissed

With Prejudice Without Prejudice

This case be dismissed for the following reason(s) (you MUST check one of the following boxes):

- The Defendant is not a current resident of this township, is not currently doing business in this township, and is not currently employed in this township, as required by NRS 73.010.
- Plaintiff sought additional remedies that are not authorized in small claims cases:

- Plaintiff's case is barred by the expiration of the applicable statute of limitations.
- Plaintiff has already recovered a money judgment against the Defendant in the following case:
_____. Therefore, the instant case is barred by theories of claim preclusion and/or issue preclusion.
- Pursuant to JCRCP 93, this case be dismissed without prejudice because the Affidavit of Complaint has not been served upon the Defendant within one year of the Affidavit's filing date.
- Plaintiff has failed to state a valid claim upon which relief can be granted.
- The debt alleged by Plaintiff has been discharged in Bankruptcy Court.
- Plaintiff did not appear for the scheduled, mandatory Small Claims Mediation session held on the following date:

- Other: Plaintiff has brought its claim against defendant based upon a good faith communication in furtherance of right to free speech in direct connection with an issue of public concern, and the action must be dismissed under N.R.S. 41.670. Please see attached memorandum in support.

Per NRS 53.045, "I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct."

Laura M. Tucker
(Signature) Laura M. Tucker, Randazza Legal Group

12/16/2013
(Date)

CERTIFICATION OF MAILING

The Undersigned certifies on the 16 day of December, 2013, a copy of the foregoing Defendant's MOTION TO DISMISS SMALL CLAIMS CASE was mailed to Nevada Corporate Headquarters at 101 Convention Center Drive, Suite 700, Las Vegas, NV 89109 by depositing a copy in the United States Mail in an addressed sealed envelope, postage prepaid.

(Date) 12/16/2013 (Type or Print Name) Laura M. Tucker (Signature) *Laura M. Tucker*

Per NRS 53.045, "I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct."

Laura M. Tucker
(Signature) Laura M. Tucker

12/16/2013
(Date)

DEFENDANT OPINION CORP. D/B/A PISSED CONSUMER'S MEMORANDUM IN
SUPPORT OF SPECIAL MOTION TO DISMISS

INTRODUCTION

Defendant Opinion Corp., d/b/a Pissed Consumer (“Opinion Corp.”) is not a proper party to this suit. NCH’s claims are barred by the First Amendment to the United States Constitution and by 47 U.S.C. § 230, which protects website operators from tort claims brought as a result of third-party conduct.

Plaintiff filed its grievance for a nominal amount in the Small Claims Department of the Las Vegas Township Justice Court with the intention of receiving a quick judgment in its favor that it hoped would force Opinion Corp. to take down all references to NCH — when, in fact, federal law bars the claims and supports a finding that NCH should be suing the posters themselves, not Opinion Corp. Furthermore, the Plaintiff’s improper claims require the Plaintiff pay the Defendant’s costs in defending the meritless action.

In May 2013, the Nevada Legislature revised existing law to prevent suits such as this from being filed. Senate Bill 286, which took effect in October 2013, revises Nevada’s existing anti-SLAPP statute (N.R.S. 41.635-41.670) to bar lawsuits challenging conduct in furtherance of free speech. Because NCH’s lawsuit threatens free speech rights, the statute requires Plaintiff to establish, by clear and convincing evidence, that it will prevail on the merits. NCH cannot meet its burden, and this suit should be dismissed.

I. Statement of Facts

Defendant Opinion Corp., a New York company, operates a website entitled “pissedconsumer.com,” which is an online forum where consumers discuss their experiences with products and services to warn other consumers of negative experiences. Opinion Corp.

does not target any businesses in particular, and it does not remove posts absent a court order or notarized letter written by the poster. (See Pissed Consumer FAQ at page 3, attached as Exhibit A).

Plaintiff Nevada Corporate Headquarters, a Nevada company, is a business that advertises services offering asset protection and reduced tax exposure by helping customers incorporate in Nevada. (See Exhibit B, NCH homepage).

II. Legal Argument

Under Nevada law, a defendant who “engages in a good faith communication ... in furtherance of free speech” is immune from civil liability based upon that communication. N.R.S. 41.650. If a lawsuit is brought forth for this purpose, the defendant may file a special motion to dismiss. N.R.S. 41.660(1)(a). This document is such a motion.

The motion is evaluated in two steps. First, the moving party must show, by preponderance of the evidence, that the claim is based upon a good faith petition in furtherance of free speech. N.R.S. 41.660(3)(a). If the moving party meets its burden, it is up to the plaintiff to show, by clear and convincing evidence, the probability of prevailing on the claim. N.R.S. 41.660(3)(b). If the court grants a special motion to dismiss, the prevailing party shall receive reasonable attorneys fees and costs, and up to \$10,000 in damages. N.R.S. 41.670(1)(a)-(b).

As set forth below, Opinion Corp. can easily meet the first prong, while Plaintiff NCH cannot meet its burden. Accordingly, this Court should grant Opinion Corp.’s special motion to dismiss and award Defendant’s reasonable fees and costs.

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A. Plaintiff's claims arise from Opinion Corp.'s conduct in furtherance of free speech in connection with issues of public interest.

Nevada's anti-SLAPP statute contemplates Opinion Corp.'s operation of Pissedconsumer.com as protected conduct as defined in N.R.S. 41.637(4): "Communication made in direct connection with an issue of public interest in a place open to the public or in a public forum." Opinion Corp. can show by a preponderance of the evidence that its conduct was in furtherance of free speech in connection with issues of public interest.

1. PissedConsumer.com is operated "in furtherance of free speech."

The First Amendment to the United States Constitution and Article 1, Section 9 of the Nevada Constitution protect the right of freedom of speech, including the right to engage in expressive activity. This right is not limited to public addresses, but protects "every form and manner of dissemination of the ideas ...that appear best fitted to bring such ideas and views to the attention of the general populace, and to the attention of those most concerned with them." *State ex rel. Culinary Workers Union v. Eighth Judicial Dist. Court*, 66 Nev. 166, 173 (Nev. 1949), *overruled in part by Vegas Franchises, Ltd. v. Culinary Workers Union*, 83 Nev. 422 (Nev. 1967). Although Nevada's law is new, and thus has not yet expressly addressed the issue, other jurisdictions have found that websites that are accessible to the general public are a public forum for the purposes of an anti-SLAPP motion. *See Cole v. Patricia A. Meyer & Associates, APC*, 206 Cal. App. 4th 1095, 1121 (Cal. App. 2012); *Piping Rock Partners, Inc. v. David Lerner Assocs.*, 2013 U.S. Dist. LEXIS 70660, *10 (N.D. Cal. 2013); *Higher Balance, LLC v. Quantum Future Group, Inc.*, 2008 U.S. Dist. LEXIS 102611 *8 (D. Ore. 2008), *citing ComputerXpress, Inc. v. Jackson*, 93 Cal. App. 4th 993, 113 Cal. Rptr. 2d 625, 638 (Cal. App. 2001) and *Global Telemedia International, Inc. v. Doe*, 132 F.Supp.2d 1261, 1264 (C.D. Cal.

2001). Even where an individual website offers only one viewpoint, it still operates as part of a public forum because others can publish their own websites within the same medium of the World Wide Web. *Wilbanks v. Wolk*, 121 Cal. App. 4th 883, 897 (Cal. App. 2004) (finding a consumer watchdog site was a public forum, despite not posting both viewpoints); *see also Vogel v. Felice*, 127 Cal. App. 4th 1006, 1015 (Cal. App. 2005) (finding a website that posted “top ten dumb asses” list was a public forum).

Opinion Corp. operates a website where third-party users post reviews about various companies. Although Opinion Corp. does not participate in the content of its website, it provides a publically accessible forum through which information about businesses may be exchanged by the public. Opinion Corp.’s operation is similar to Yelp! and other consumer review sites, which allow users to post about their experience. As such, PissedConsumer.com operates in furtherance of free speech.

2. NCH’s business practices are a matter of public concern for the purposes of consumer reporting.

Under Nevada law, for the purposes of a review, businesses that “actively advertise and seek commercial patronage” are public figures, “at least for the purpose of consumer reporting on their goods and services.” *Pegasus v. Reno Newspapers, Inc.*, 118 Nev. 706, 721 (Nev. 2002). When a party is a limited-purpose public figure, that party has voluntarily injected itself into the public concern. *Id.* at 720.

NCH is a Nevada business that actively advertises and seeks commercial patronage. NCH hosts a website where it posts a product and services guide, testimonials, and instructional videos to seek clients. (See Exhibit B, Plaintiff’s homepage). NCH also utilizes social networking sites, such as Facebook, Twitter, and LinkedIn, (See Exhibit C, Plaintiff’s social

networking websites) and posts video advertisements on its own YouTube channel. (See Exhibit D, Plaintiff's YouTube channel). Clearly, NCH is at least a limited-purpose public figure, and any reviews regarding the quality of its services would be considered to be an issue of public interest. Therefore, because Opinion Corp. provides a public forum through which consumers can post reviews about Plaintiff's business, these consumer reports are a matter of public interest.

Because Opinion Corp. can show that it is more probable than not that its conduct was made in furtherance of free speech regarding a matter of public concern, Defendant has met the burden necessary to meet the first prong of Nevada's anti-SLAPP statute.

B. Plaintiff cannot establish by clear and convincing evidence that it will prevail on its claims.

Once the moving party has shown that its conduct was made in furtherance of the right to free speech, the burden falls to the non-moving party to show, by *clear and convincing evidence*, that it will prevail on its claims. N.R.S. 41.660(3)(b). Because Opinion Corp. is 100 percent protected by federal law, NCH will not prevail on its claims.

Opinion Corp. serves only as host to the content appearing on PissedConsumer.com and is not the author or editor of the reviews. Because it is a service provider and not a publisher, Opinion Corp. is immune from state-law liability under 47 U.S.C. § 230 (the "Communications Decency Act"). In enacting Section 230, Congress made a choice not to discourage "speech through the separate route of imposing tort liability on companies that serve as intermediaries for other parties' potentially injurious messages." *Zeran v. America Online, Inc.*, 129 F.3d 327, 330-31 (4th Cir. 1997). Because Opinion Corp. mainly provides a forum for which third parties can post ideas, it falls directly within Section 230's immunity, and Plaintiff's claims against it will not be successful. *See, e.g., Batzel v. Smith*, 333 F.3d 1018, 1030 (9th Cir. 2003); *Zeran*, 129 at

331; *Barrett v. Rosenthal*, 40 Cal. 4th 33, 63 (Cal. 2006); *Best Western Int'l., Inc. v. Furber*, 2008 U.S. Dist. LEXIS 70552, *31-*33 (D. Ariz. 2008); *Gaston v. Facebook, Inc.*, 2012 Dist. LEXIS 23895, *16-*17 (D. Ore. 2012).

In order to qualify as a service provider under Section 230, (1) the defendant must be a provider or user of an interactive computer service; (2) the cause of action must treat the defendant as a publisher or speaker of information; and (3) the subject information must be provided by another information content provider. *Gentry v. eBay, Inc.*, 99 Cal. App. 4th 816, 830 (2002). Opinion Corp. easily meets all three of the criteria under Section 230.

Opinion Corp. is a provider of an interactive computer service. An interactive computer service is defined as an “information service, system, or access software provider that provides or enables computer access by multiple users or a computer server, including specifically a service or system that provides access to the Internet.” 47 U.S.C. § 230(f)(2). Courts adopt a broad view in interpreting “interactive computer service,” including those services that use Internet access to distribute information to an audience. *Batzel*, 333 F.3d at 1030. Opinion Corp. is included within this broad definition, as it provides access to a website where “multiple users” can present and read information about various businesses.

Most importantly, Section 230 protects interactive computer services, but does not give immunity to a publisher or speaker of content. 47 U.S.C. §§ 230(c)(1), (e)(3). An interactive computer service shall not “be treated as the publisher or speaker of any information provided by another information content provider.” § 230(c)(1). When determining if Section 230 applies to a cause of action, courts must ask “whether the duty that the plaintiff alleges the defendant violated derives from the defendant’s status or conduct as a ‘publisher or speaker.’ If it does, section 230(c)(1) precludes liability.” *Barnes v. Yahoo, Inc.*, 570 F.3d 1096, 1102 (9th Cir.

2009). Specifically, the U.S. Court of Appeals for the Ninth Circuit has determined that “publication” includes “reviewing, editing, and deciding whether to publish or to withdraw from publication third-party content.” *Id.*

Plaintiff’s claim seeks to treat Defendant as the publisher of the third-party posts and to hold it liable for the content. However, Defendant does not write any of the reviews that appear on PissedConsumer.com. Additionally, despite Plaintiff’s contentions that Defendant charges money to remove reviews, this is not the case; it is Opinion Corp.’s policy that it will not remove content absent a court order or notarized letter from the user retracting the post. (See Exhibit A, PissedConsumer FAQ). Merely making the content available to the public is not enough to make it a content provider. *See Parisi v. Sinclair*, 774 F.Supp.2d 681 (D.D.C 2011) (finding that Barnes & Noble is not a content provider of book descriptions listed on its website); *Corbis Corp. v. Amazon.com, Inc.*, 351 F.Supp.2d 1090 (W.D. Wash. 2004) (holding Amazon.com is not a content provider of information posted by third-party vendors). In fact, courts have held that Opinion Corp. is an interactive computer service under Section 230. *See Ascentive, LLC v. Opinion Corp.*, 842 F.Supp.2d 450, 476 (E.D.N.Y. 2011). Therefore, Opinion Corp. is an interactive computer service and not a publisher.

Because Opinion Corp. has satisfied all three elements of Section 230 immunity, Plaintiff cannot show by clear and convincing evidence that it will prevail on its claims. Therefore, its claims should be dismissed.

C. Defendant Opinion Corp. is entitled to attorney’s fees and costs.

In the event a court grants a special motion to dismiss under Nevada’s anti-SLAPP statute, the court “shall award reasonable costs and attorney’s fees to the person against whom

the action was brought.” N.R.S. 41,670(1)(a). Defendant respectfully requests the court award reasonable attorneys fees and costs to Opinion Corp. for the cost of preparing this motion.

III. Conclusion

As set forth above, Defendant has shown by a preponderance of the evidence that Plaintiff’s claims are based upon conduct by the Defendant made in furtherance of free speech in connection with an issue of public interest. Furthermore, Plaintiff cannot show, by clear and convincing evidence, that will succeed on its claims. Accordingly, Defendant Opinion Corp. respectfully requests that the Court dismiss Plaintiff’s claims and award reasonable attorneys fees and costs to Defendant.

EXHIBIT A



[Home \(/\)](#) → [Publications & White Papers by Pissed Consumer](#)

<http://www.pissedconsumer.com/static/publications.html> →

Pissed Consumer Questions and Answers (FAQ)

Over the years, Pissed Consumer has received multiple inquiries from our users, companies and legal professionals. On a regular basis we receive emails with common queries that we decided to address in this FAQ section. Here we have attempted to address as many questions as possible.

General Questions

1. Is a login required to post on the website?

While Pissed Consumer encourages users to create accounts, users are able to submit postings anonymously. Therefore, a login is not required to submit a posting on the website.

2. How long will my posting remain on the website?

Provided that a posting complies with our Terms of Service, it shall remain active on our website indefinitely.

3. What happens if the same article or comment is reposted on Pissed Consumer several times?

Upon review of the posting, PissedConsumer.com may classify such posts as spam and remove duplicate entries.

For Posters

4. How do I edit/remove reviews I have posted previously?

At present, Pissed Consumer does not offer users the opportunity to edit or remove prior postings. You can add supplemental information to the review if review was created under your account. Please login into your account and go to the review to add supplemental information.

5. What happens if I misrepresented the facts in a prior posting (posted false information)?

Users should be advised that Pissed Consumer does not endorse the posting of false information. If you have made a false posting on our website previously and wish that your prior post be removed, submit a notarized letter outlining the details below.

Notarized letter must include the following:

1. A statement that you are the user who posted the information that you now seek to remove;
2. A statement that the information previously posted by you was incorrect at the time it was posted;
3. Your full name, mailing address, email address and signature;
4. The URL (Address) of the subject post as it appears on PissedConsumer.com;
5. The statement "I declare under penalty of perjury that the information provided in this request is true and accurate to the best of my knowledge."
6. Legible notary stamp (please make sure we can read commission or id number).

Please send all the documents to our mailing address that you can find on [Contact Us \(http://www.pissedconsumer.com/contact.html\)](http://www.pissedconsumer.com/contact.html) Page. Please also notify us via form located on the same page.

PissedConsumer.com will review submitted documents and make determination. Such review may take up to 2 weeks.

Please follow the link to watch online instructions: <http://www.youtube.com/watch?v=ZToobE7IHjE> (<http://www.youtube.com/watch?v=ZToobE7IHjE>).

6. How do I change my username?

Our system does not allow changing username after registration. But you are always welcome to create a new account with a user name you wish.

7. How do I change the email my Pissed Consumer account is associated with?

You can change an email address associated with your account on the "Settings" page:

- Log into your account;
- Click "Settings" at the top right corner of the screen;
- Type in your desired new email in the "Email Address" field;
- Press "Save" button to save the changes;

Your new email takes effect immediately.

8. How do I change my Pissed Consumer account password?

- If you want to change your password, please follow the steps below:

- Log into your account;
- Click "Settings" button on the toolbar;
- Type in your desired new password in the "Password" field.

Make sure you create a unique password to help keep someone from breaking in to your account.

- Confirm your new password in the "Verify Password" field;
- Press "Save" button to save your changes;

Your new password takes effect immediately.

For Companies and Individuals

9. Can we reply to a posting? Can we address the issue raised in the posting?

Yes. Under each posting made on the website there is an area for comments. A company wishing to engage with a consumer about a topic can submit a comment to original posting. We recommend that a company leave its customer service contact information: phone, name, etc. under the post for the benefit of all consumers who may have similar issues.

10. Can a review be removed from our website?

A post may be removed from our website either by order of a court or by a user complying with our removal procedures discussed above. PissedConsumer.com may also consider the removal of a posting, should we determine that a user is in violation of our Terms of Service.

11. What can a company do if it believes that the description posted at http://<company_name>.pissedconsumer.com is inaccurate or if the customer service information posted is outdated?

There are two options here:

- a) You can fill out "Suggest Changes" form found under each company description;
- b) You can send your concerns and/or suggested corrections using the form located at [Contact Us \(http://www.pissedconsumer.com/contact.html\)](http://www.pissedconsumer.com/contact.html). Pissed Consumer will review your request within 2 weeks. If your request is not addressed by Pissed Consumer within initial 2 week period, please resubmit your request.

12. Does Pissed Consumer investigate the postings published on the website?

PissedConsumer.com does not investigate the postings made by users.

13. What can we do if we believe that someone is slandering (<http://en.wikipedia.org/wiki/Slandering>) our organization on Pissed Consumer?

It would be advisable for you to speak to legal Professional about the situation. Pissed Consumer will comply with court orders.

For Legal Professionals

14. Where can I find information related to Pissed Consumer's civil subpoena policy?

Please contact us via form located at [Contact Us \(http://www.pissedconsumer.com/contact.html\)](http://www.pissedconsumer.com/contact.html) and we will send you the policy.

15. Will Pissed Consumer ask for the Legal Fees if we sue them using SLAPP techniques?

Yes. Please make sure your client knows and understands that Pissed Consumer will ask for the Attorney Fees at the end of the legal proceedings.

EXHIBIT B



For over 20 years, NCH has been the source for Nevada corporations, Nevada LLCs, asset protection strategies, business credit establishment and many other business/financial services. Unlike other companies, NCH prides itself on service and guidance for clients with a genuine desire to help you succeed. Whether you are thinking of incorporating a business or looking for asset protection strategies – look to NCH's In-house team of business and finance experts.

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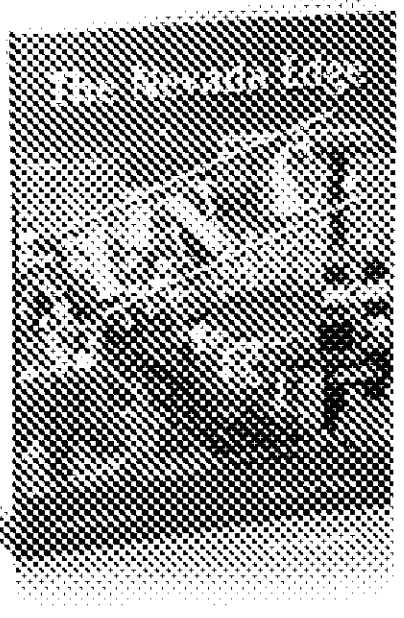
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The Nevada Edge - by Cort W. Christie
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I normally run my own business

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You can't afford to ignore the benefits a Nevada corporation or Nevada LLC brings. You can reduce taxes legally, gain valuable asset protection strategies, and stay private all by incorporating in Nevada.

CLIENT TESTIMONIAL

ROCKSTAR

NCH has filled all our varied needs at all times and we highly recommend them. In our dealings with NCH, they have guided us through many steps of incorporation and ultimately have given sound advice and references to seasoned tax professionals. We have returned to NCH for our business.

Nevada corporation services are our business; we've formed over 80,000 Nevada corporations during our 15 years in business. Take advantage of our experience -- call today -- speak to a Nevada incorporation specialist. Whether you seek a Nevada Corporation, a Nevada LLC or valuable asset protection strategies we have all the answers. Nevada Corporate Headquarters Incorporated - your number one source for Nevada corporation services.

Many people are unaware that each of the fifty states writes its own unique statutes regarding corporate structuring, operational requirements, legal protection (such as the corporate veil) and personal privacy protection. No state in the union has more business-friendly incorporation statutes than the state of Nevada. That's why you need to incorporate in Nevada!

- In 1998, Nevada made its first appearance on the top ten list of states with the highest number of incorporations, even though thirty-six states have larger populations
- Each month, more than 5,000 Nevada corporations and Nevada LLCs are formed, with more than 80% of them formed by people who live outside Nevada.

Almost without exception, you may form your Nevada corporation or Nevada LLC even though you operate your company in another jurisdiction.

For example, in the state of Nevada, the corporate veil may be pierced only if the owner of a company is deemed to have committed deliberate fraud. The corporate veil may be pierced much more easily in other states.

At NCH, we're so certain that Nevada law will provide you, your family and your business with maximum legal protection that we offer a \$100,000 guarantee that the corporate veil of your Nevada corporation will never be pierced. Get a Nevada corporation today!

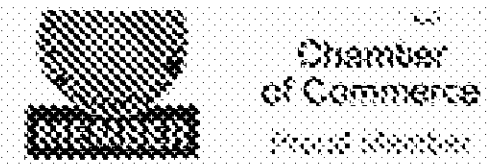
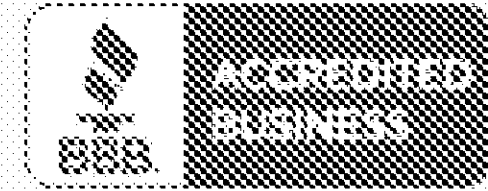
REMEMBER: Navigate through the complexity of incorporating a business with expert guidance -- Nevada corporations, asset protection strategies and Nevada LLC are our business.

You Can Live Anywhere and Still Incorporate in Tax Free, Lawsuit Proof, Private Nevada! Reduce your taxes and keep your personal assets safe. Schedule your free consultation today, call 1-800-508-1729 8:00am - 5:00pm, PT.

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Sincerely,

Janet A. Weiner
CFO & COO | Rockstar, Inc.



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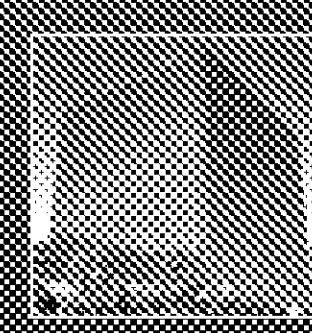
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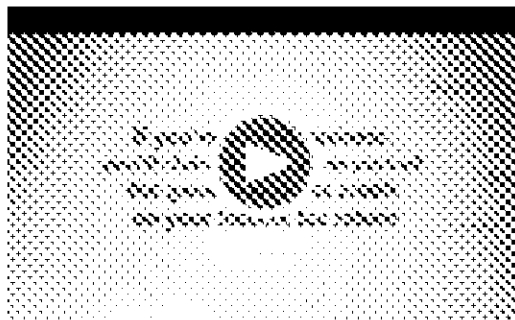


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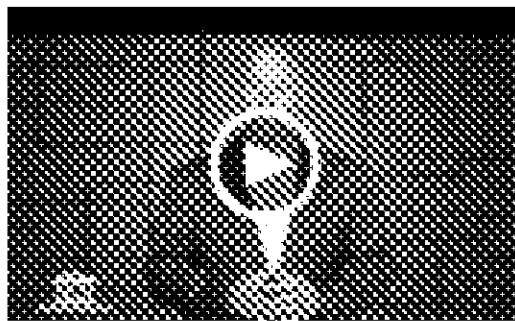


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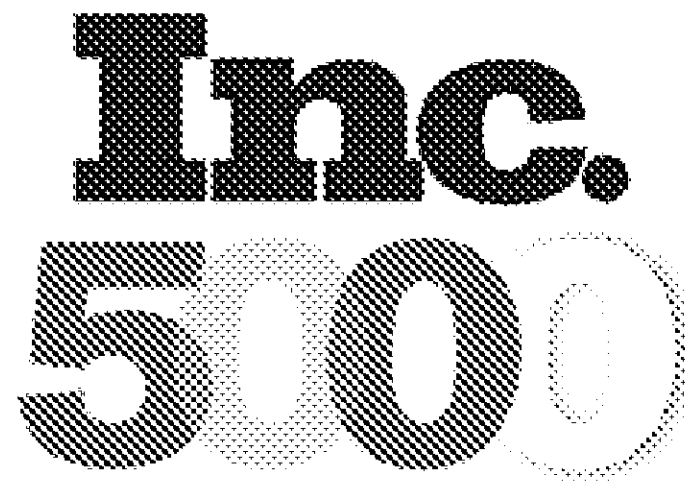
Company Size
51-200 employees

Website
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Industry
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Headquarters

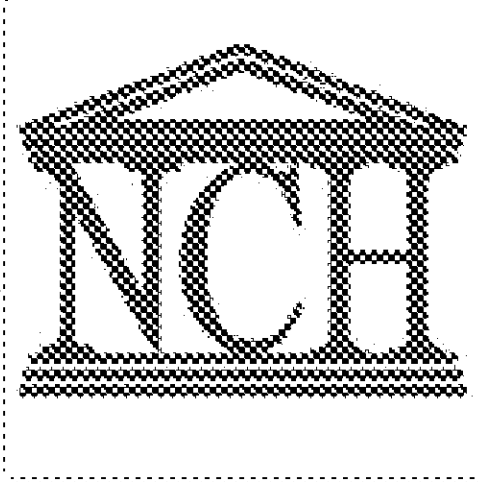
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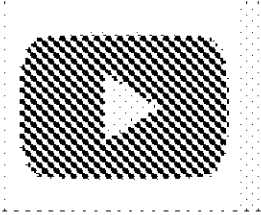
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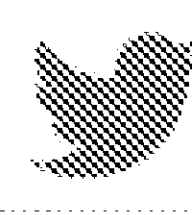
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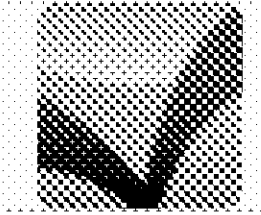
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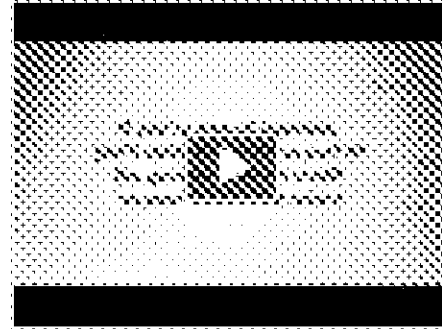
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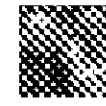


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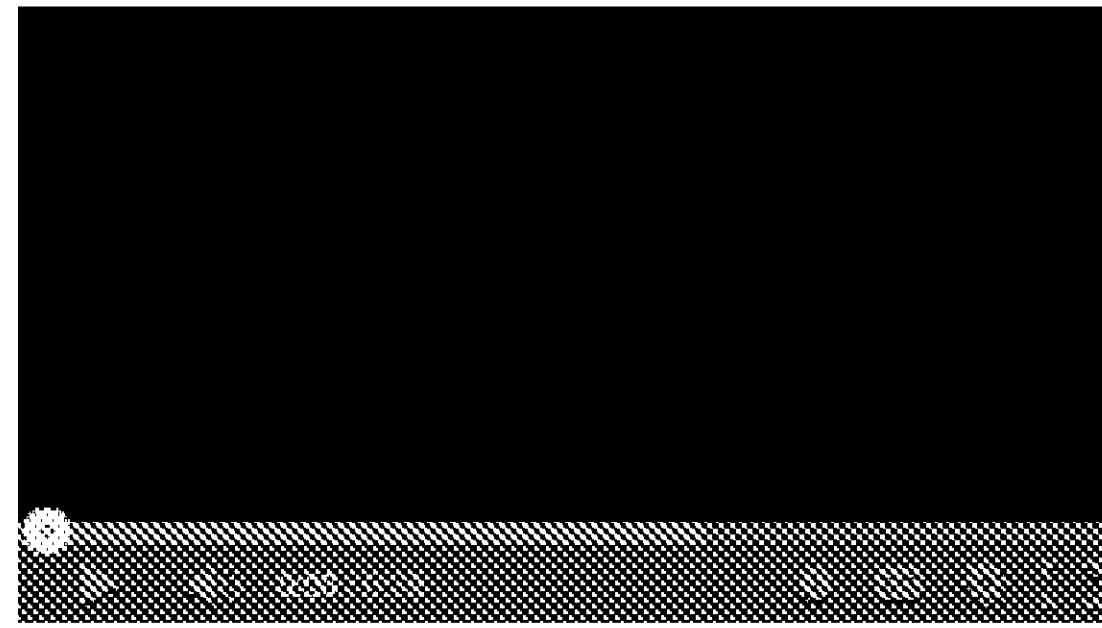


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<http://www.nchinc.com/>

Hi, I'm Cori Christie, Founder of Nevada Corporate Headquarters. I want to welcome you to our YouTube channel. Here, you will find dozens of free business tips to help you understand the many benefits of incorporating in Nevada. From building business credit to Nevada's unique liability protection, check out our...

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EXHIBIT C

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

13A003332

Nevada Corporate Headquarters, Cort
Christie, Plaintiff

vs.

Pissed Consumer, Media Relations,
Defendant(s)

LAS VEGAS JUSTICE COURT
Electronically filed

11:23:01 AM
REFEREE'S FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND
RECOMMENDATIONS
Clerk of the Court

After hearing the above matter, this referee submits the following:

FINDINGS OF FACT: Defendant is an information content provider as defined by statute and the comments were not posted by Defendant.

CONCLUSIONS OF LAW: Defendant is entitled to \$230 immunity. Accordingly, the Motion to Dismiss is granted. Attorneys fees are not recoverable in small claims court. NRS 73.090. No evidence of costs incurred provided.

REFEREE'S RECOMMENDATIONS:

- Plaintiff should be awarded _____ in damages and _____ in costs.
- Plaintiff should be awarded nothing against Defendant.
- Confession Default Dismissed With Prejudice Dismissed Without Prejudice
- Plaintiff should be awarded _____ in damages and _____ in costs on Defendant's Counterclaim (if applicable)
- Defendant should be awarded _____ in damages and _____ in costs on Defendant's Counterclaim (if applicable)
- Defendant should be awarded nothing on Defendant's Counterclaim (if applicable).
- Other: Motion to Dismiss granted.

DATED: 1/22/14 Referee: [Signature]
This form was HANDED TO MAILED TO THE PARTIES THE FRONT COUNTER on 1/23/14 by [Signature]

NOTICE

If either Plaintiff or Defendant has failed to appear for the scheduled court date, the party that failed to appear may not file a formal objection. Instead, relief must be sought from the referee who presided on that date.

If both the Plaintiff and Defendant have appeared for hearing before the referee, either party may object to the referee's findings of fact, conclusions of law, and recommendations by filing a formal objection within 5 days after the receipt of this document. Because of this rule, two outcomes are possible.

- (1) A timely objection can be filed, and a justice of the peace will review the matter by a trial de novo before issuing a final judgment.
- OR
- (2) If a timely objection is not filed, the Court will automatically accept these findings, and this referee's decision will become a judgment. At that time, copies of the final judgment can be obtained at the Justice Court Front Counter and the case can be appealed to District Court. However, a notice of appeal must be filed within 5 days from the entry of the judgment. (Detailed information relating to small claims appeals is contained in the small claims information packet).

PLEASE NOTE THAT THIS REFEREE'S DECISION DOES NOT BIND THE PARTIES AND IS NOT ENFORCEABLE IN ANY MANNER UNTIL THE FORMAL OBJECTION PERIOD HAS EXPIRED.

EXHIBIT D

Justice Court, Las Vegas Township

CLARK COUNTY, NEVADA

Handwritten: 4/22/13 11:00

Name: Nevada Corporate Headquarters, Inc.
Address: 101 Convention Center Drive, Suite 700
Las Vegas, Nevada 89109

Plaintiff,

CASE NO. LAS VEGAS JUSTICE COURT 13A001271/7

Electronically filed
04/09/2013 01:09:55 PM
Karen Handerson
AFFIDAVIT OF COMPLAINT
SMALL CLAIMS
CLERK OF THE COURT

--vs--

Name: Xcentric Ventures, LLC aka Ripoff Report
Address: 3200 North Central Avenue, Suite 2000
Phoenix, Arizona 85012

Defendant,

STATE OF NEVADA)
COUNTY OF CLARK)

Cort Christie

being duly sworn, states: that the Defendant owes the Plaintiff the

sum of \$ 750.00 and Specific Performance for defamation, business disparagement, false light and civil extortion. Defendant has posted or allowed postings of alleged, anomomous individuals about Plaintiff which are untrue and have been contested. Defendant has published or republished defamatory statements on the internet which have cast Plaintiff is a false light.

that demand for payment has been made; the Defendant refuses to pay; that the Defendant either resides, works or does business in the Township of Las Vegas, County of Clark, State of Nevada.

SUBSCRIBED AND SWORN to before me this

8th day of April, 2013
Deborah J. Kusiak



DEBORAH J. KUSIAK
NOTARY PUBLIC
STATE OF NEVADA
Date Appointed: Exp. 12/31/15
Certificate No. 12123456
[Signature]

PLAINTIFF

Phone Number: 800.508.1890

Date: _____

NOTARY PUBLIC

OR: ONE OF THE FOLLOWING: Per NRS 53.045

(a) If executed in this state (Nevada): "I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____
(Date)

(Signature)

(b) If executed outside of this state (Nevada): "I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct."

Executed on _____
(Date)

(Signature)

To the above-named DEFENDANT(S):

A SMALL CLAIMS ACTION HAS BEEN COMMENCED AGAINST YOU!

YOU ARE DIRECTED TO E-FILE (electronically file), with the Las Vegas Justice Court Clerk's Office, AN ANSWER WITHIN TWENTY (20) CALENDAR DAYS from the date of service of the Complaint. Use the attached ANSWER form. You must mail a copy of your Answer to Plaintiff(s) immediately after E-Filing your Answer with the Las Vegas Justice Court. Your failure to Answer (respond to) the Complaint within 20 calendar days may result in the Plaintiff(s) filing a Motion for Default Judgment against you. This means the Referee or Judge may grant a Judgment for the Plaintiff(s) based on the claims/allegations in the Complaint and without considering your possible defense(s) or explanation(s).

INSTRUCTIONS TO PLAINTIFF OR DEFENDANT

Read Carefully

1. Before filing a Small Claims Complaint, the PLAINTIFF must do the following:

- Send a demand letter, with return receipt requested, to the DEFENDANT. The demand letter must instruct the DEFENDANT to pay the amount due within 10 days of the date that the letter is sent, or the PLAINTIFF will file a Small Claims case against the DEFENDANT.
- Wait at least 10 days from the date the demand letter is sent before filing a Small Claims case against the DEFENDANT.
- Include a copy of the demand letter along with the signed return receipt (as proof of mailing) with the Small Claims Complaint when the Small Claims case is filed against the DEFENDANT.

If the PLAINTIFF does not follow the steps above, including filing a copy of the demand letter and proof of mailing, or waiting 10 days from the date the demand letter is sent before filing a Small Claims case, the Referee or Judge may dismiss the Small Claims case and/or impose another sanction.

2. The PLAINTIFF must file a Small Claims action in the township where the DEFENDANT currently resides, works, or does business.

3. The PLAINTIFF cannot sue in Small Claims court for more than \$7,500.00, excluding interest and costs. Payment by the losing party of the attorney's fees of the winning party is not allowed except in cases involving shoplifting.

4. The PLAINTIFF must show the complete name and address of the DEFENDANT in the caption (*Name & Address of Defendant(s)*) to ensure service on the DEFENDANT. If there are two DEFENDANTS and they reside at different addresses, the PLAINTIFF must include both addresses.

5. The PLAINTIFF may serve the DEFENDANT by licensed private process server, a disinterested third party, or the Constable. The PLAINTIFF, himself or herself, may not serve the Small Claims Complaint on the DEFENDANT. The fully completed Affidavit of Service Form must be filed immediately after the Complaint is served.

6. If a Small Claims Complaint is not served for one year after it is filed, the Judge or Clerk may dismiss the case without prejudice (this means the case may be refiled within the statute of limitations for such cases, but a new filing fee would be required).

7. The PLAINTIFF must pay court costs at the time of filing this Complaint. If a Plaintiff cannot afford the costs, he or she may apply for a fee waiver.

8. The DEFENDANT may electronically file the Answer, no later than 20 calendar days from the date of service of the Complaint, making any defense to the claim. The Defendant may electronically file the Answer. (\$3.50 charge using credit or debit card) at:

<http://wiznet.wiznet.com/clarknv>, or the Defendant may come to the Court and electronically file, for free, the original copy of the Answer. A copy of this Answer **must be mailed by U.S. Mail, first-class postage, to PLAINTIFF immediately after E-Filing the Answer with the Las Vegas Justice Court.**

9. If an Answer is filed, the Court will schedule the case for hearing/trial and will notify all parties of the date, time, and location by mail. If the DEFENDANT fails to appear for the scheduled hearing/trials, a judgment may be entered against the DEFENDANT.

10. Standard forms are supplied in order to expedite the handling of Small Claims cases. The forms are designed to cover the most common claims but are not specifically designed for any individual case.

11. If DEFENDANT believes the case should be dismissed, DEFENDANT may petition the Court to dismiss the case and must explain the reasons for the request. A Motion to Dismiss form is available for use. It is designed to cover the most common reasons for dismissal but is not specifically designed for any individual case.

12. Hearings in Small Claims cases are informal and are designed to promote fair and speedy justice. The PLAINTIFF and DEFENDANT may offer evidence, including witnesses, to support their arguments.

13. If English is not your first language and you would like someone to interpret for you during your court appearance, you are encouraged to use a volunteer language interpreter. You may ask a friend, relative, or coworker to come to court to interpret for you. Bringing your own interpreter with you is both effective and efficient and will allow you to better understand the proceedings.

14. If a court-appointed interpreter is needed for a party who does not speak English, or for a party with a communications disability, that party must file a written motion to request an interpreter, and the compensation for that interpreter shall be paid as provided by law.

15. A party incarcerated in a prison or jail or a party living outside Clark County may participate by telephone conference or video conference. The party must contact the Las Vegas Justice Court Clerk's Office in advance of the hearing/trial to make necessary arrangements.

16. The Las Vegas Justice Court Clerks can neither give legal advice nor assist in completing Court forms. The staff of the Self-Help Center, located on the 1st floor of the Regional Justice Center, can assist in providing information and forms for people who are representing themselves in Court. If you need more detailed assistance, you should consult an attorney.

Original-File

Copy-Plaintiff(s)

Copy-Defendant(s)

**JUSTICE COURT, LAS VEGAS TOWNSHIP
Clark County, Nevada**

Case No. _____

Name of Plaintiff(s)

Department No. _____

(Plaintiff's Telephone Number)

VERSUS

**SMALL CLAIMS
ANSWER**

Name of Defendant(s)

- NRS 604A (consumer debt/credit card)
- NRS 97A (payday loans collections)
- Nevada Department of Corrections cases involving inmates

(Defendant's Telephone Number)

There is no statutory filing fee for filing a Small Claims Answer. Each Defendant must file his or her own Answer and must pay any applicable E-Filing fee imposed by the Court.

PLEASE TYPE OR PRINT LEGIBLY.

Defendant's Answer to the Small Claims Complaint:

1. Are you currently a resident of the Las Vegas Township? Yes No
2. Do you currently do business in the Las Vegas Township? Yes No
3. Are you currently employed within the Las Vegas Township? Yes No

Please check the applicable box below.

- I agree that I owe the amount of money claimed by the Plaintiff(s).
- I do not agree that I owe the amount of money claimed by the Plaintiff(s), for the following reasons:

Answering Defendant's Address: _____ Phone Number: _____

Check here if you need more space. Add additional sheet(s) of paper and attach to this form with "SMALL CLAIMS ANSWER" on top.

TO DEFENDANT: Your original Answer must be filed with the Las Vegas Justice Court Clerk's Office and a copy provided to the Plaintiff(s) within 20 calendar days of service of the Complaint. Your failure to answer (respond to) the Complaint within 20 calendar days from service of the Complaint, may result in the Plaintiff filing a Motion for Default Judgment against you. This means the Referee or Judge may grant a Judgment for the Plaintiff based on the claims/allegations in the Complaint without considering your possible defense(s) or explanation(s).

You may electronically file your Answer, (\$3.50 charge) at <http://wiznet.wiznet.com/clarknv>, or you may come to the Court and electronically file, for free, the original copy of your Answer at either:

Self-Help Center
Regional Justice Center, 1st Floor
200 Lewis Avenue, Las Vegas, NV 89155-2511

Justice Court Clerks' Office, Las Vegas Township
Regional Justice Center, 2nd Floor
200 Lewis Avenue, Las Vegas, NV 89155-2511

Please check the applicable box below.

- In conjunction with the filing of the Answer, I am mailing a copy of the Answer to the Plaintiff(s) at the following address: _____

Both the Plaintiff(s) and Defendant(s) will be notified by mail of the date and time that the Court has scheduled this case for hearing/trial.

You MUST have this affidavit notarized (block on the left) or sign the unsworn declaration per NRS 53.045 (block on the right):

SUBSCRIBED AND SWORN to before me this _____ day of _____, 20____.

NOTARY PUBLIC in and for the County of _____ State of _____

OR UNSWORN DECLARATION: Per NRS 53.045
"I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct."

Signature: _____

(Typed or printed name): _____

(Date): _____

EXHIBIT E

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA



13A001271

Nevada Corporate Headquarters, Inc.,
Plaintiff

vs.

Xcentric Ventures LLC, Defendant(s)

LAS VEGAS JUSTICE COURT
FILED IN OPEN COURT
JUN 12 2013
BY: EG

REFEREE'S FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND
RECOMMENDATIONS

After hearing the above matter, this referee submits the following:

FINDINGS OF FACT:

The Court lacks jurisdiction to hear this matter because the Defendant has insufficient contacts with Nevada. Based on Federal Law the Defendant has immunity from the claims.

CONCLUSIONS OF LAW:

For these reasons the Defendant's motion to dismiss is granted.

REFEREE'S RECOMMENDATIONS:

- Plaintiff should be awarded _____ in damages and _____ in costs.
- Plaintiff should be awarded nothing against Defendant.
- Confession Default Dismissed With Prejudice Dismissed Without Prejudice
- Plaintiff should be awarded _____ in damages and _____ in costs on Defendant's Counterclaim (if applicable)
- Defendant should be awarded _____ in damages and _____ in costs on Defendant's Counterclaim (if applicable)
- Defendant should be awarded nothing on Defendant's Counterclaim (if applicable).

Other: Motion to dismiss granted

DATED: 6/12/2013

Referee: [Signature]

This form was HANDED TO MAILED TO THE PARTIES THE FRONT COUNTER on 6/12/13 by [Signature]

NOTICE

If either Plaintiff or Defendant has failed to appear for the scheduled court date, the party that failed to appear may not file a formal objection. Instead, relief must be sought from the referee who presided on that date.

If both the Plaintiff and Defendant have appeared for hearing before the referee, either party may object to the referee's findings of fact, conclusions of law, and recommendations by filing a formal objection within 5 days after the receipt of this document. Because of this rule, two outcomes are possible.

- (7) A timely objection can be filed, and a justice of the peace will review the matter by a trial de novo before issuing a final judgment.
- OR
- (8) If a timely objection is not filed, the Court will automatically accept these findings, and this referee's decision will become a judgment. At that time, copies of the final judgment can be obtained at the Justice Court Front Counter and the case can be appealed to District Court. However, a notice of appeal must be filed within 5 days from the entry of the judgment. (Detailed information relating to small claims appeals is contained in the small claims information packet).

PLEASE NOTE THAT THIS REFEREE'S DECISION DOES NOT BIND THE PARTIES AND IS NOT ENFORCEABLE IN ANY MANNER UNTIL THE FORMAL OBJECTION PERIOD HAS EXPIRED.

EXHIBIT F

Karen Grand Heron

CLERK OF THE COURT

**JUSTICE COURT, LAS VEGAS TOWNSHIP
Clark County, Nevada**

Case No. 13A001271/7

Name and Address of Plaintiff(s)
Nevada Corporate Headquarters, Inc.
101 Convention Center Drive, Suite 700
Las Vegas, NV 89109
(Plaintiff's(s) Telephone Number)

Department No. _____

VERSUS

**MOTION TO DISMISS
(for use by Defendants in
Small Claims Cases)**

Name and Address of Defendant(s)
Xcentric Ventures, LLC
3200 North Central Ave., Suite 2000
Phoenix, AZ 85012
(Defendant's(s) Telephone Number: (480) 264-1400

COMES NOW, the undersigned Defendant, who hereby requests that this case be dismissed

With Prejudice Without Prejudice

This case be dismissed for the following reason(s) *(you MUST check one of the following boxes):*

The Defendant is not a current resident of this township, is not currently doing business in this township, and is not currently employed in this township, as required by NRS 73.010.

Plaintiff sought additional remedies that are not authorized in small claims cases:
Specific performance/injunctive relief

Plaintiff's case is barred by the expiration of the applicable statute of limitations.

Plaintiff has already recovered a money judgment against the Defendant in the following case:
_____. Therefore, the instant case is barred by theories of claim preclusion and/or issue preclusion.

Pursuant to JCRCP 93, this case be dismissed without prejudice because the Affidavit of Complaint has not been served upon the Defendant within one year of the Affidavit's filing date.

Plaintiff has failed to state a valid claim upon which relief can be granted.

The debt alleged by Plaintiff has been discharged in Bankruptcy Court.

Plaintiff did not appear for the scheduled, mandatory Small Claims Mediation session held on the following date:

Other: See additional attached page(s).

Per NRS 53.045, "I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct."

(Signature)

David S. Gingras

(Type or print name)

May 13, 2013

(Date)

CERTIFICATION OF MAILING

The Undersigned certifies on the 13th day of May, 2013, a copy of the foregoing Defendant's MOTION TO DISMISS SMALL CLAIMS CASE was mailed to Plaintiff at 101 Convention Center Drive, Suite 700, Las Vegas, NV 89109

by depositing a copy in the United States Mail in an addressed sealed envelope, postage prepaid.

(Date) May 13, 2013 *(Type or Print Name)* David S. Gingras *(Signature)*

(Signature)

Per NRS 53.045, "I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct."

(Signature)

David S. Gingras

(Type or print name)

May 13, 2013

(Date)

Original-File

Copy-Defendant

Copy-Plaintiff

JUSTICE COURT, LAS VEGAS TOWNSHIP	Clark County, Nevada
<small>Name and Address of Plaintiff(s)</small> Nevada Corporate Headquarters, Inc. 101 Convention Center Drive, Suite 700 Las Vegas, NV 89109 <small>(Plaintiff's(s) Telephone Number)</small>	
VERSUS	
<small>Name and Address of Defendant(s)</small> Xcentric Ventures, LLC 3200 North Central Ave., Suite 2000 Phoenix, AZ 85012 <small>(Defendant's(s) Telephone Number: (480) 264-1400</small>	

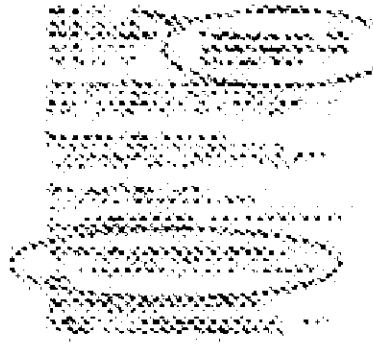
Defendant Xcentric Ventures, LLC respectfully moves the court for an order dismissing this case for the following additional reasons:

- 1.) Defendant is an Arizona-based LLC with its principal place of business in Tempe, Arizona. Defendant is not a resident of this township, does not conduct business in this township and is not employed in this township. As such, Defendant is not subject to this court's jurisdiction pursuant to N.R.S. § 73.010.
- 2.) Plaintiff's defamation claim appears to be based on statements posted on Defendant's website nearly seven years ago in June 2006. See Exhibit A attached hereto. The statute of limitation for defamation claims is two years pursuant to N.R.S. § 11.190(4)(c). As such, Plaintiff's defamation claim is barred by the statute of limitations.
- 3.) Plaintiff's Complaint fails to state a claim upon which relief may be granted because it seeks to impose liability for "publishing" or "allowing" "postings of alleged, anonymous individuals about Plaintiff which are untrue and have been contested." These allegations are not sufficient to state a claim because pursuant to federal law, specifically the Communications Decency Act, 47 U.S.C. § 230(c)(1), Xcentric is absolutely immune from any/all claims that arise from the publication of content from third parties. See *Global Royalties, Ltd. v. Xcentric Ventures, LLC*, 544 F.Supp.2d 929 (D.Ariz. 2008) (explaining Xcentric is entitled to absolute immunity for "publishing" content submitted to its website by third parties).

Exhibit A

relationship with star witnesses, allowing witnesses to knowingly lie. Tracey Richard Roberts (allegedly convicted, overwhelming evidence leads to estranged husband Michael Roberts, Rexallink failed polygraph, witness intimidation, evidence tampering, Iowa Division of Criminal Investigation corruption.

The New "Digital Extortion" is there a Ripoff Report on your



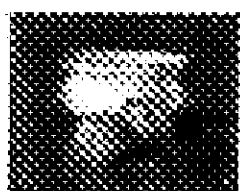
Reputation Management
SEO WARNING!
They might contact you next!

Fast Featured Reports

Ripoff Reports



Michael Roberts
Ripoff Report



Scottie Roberts
Ripoff Report

Scottie Roberts
Ripoff Report

Scottie Roberts
Ripoff Report

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Scottie Roberts
Ripoff Report

Scottie Roberts
Ripoff Report

*Consumer Comment: Scotty, get over it.

*UPDATE Employee: Utah State Tax Commission investigating Integrated Tax Solutions (ITS)

*UPDATE Employee: Utah State Tax Commission investigating Integrated Tax Solutions (ITS)

*UPDATE Employee: Utah State Tax Commission investigating Integrated Tax Solutions (ITS)

*UPDATE EX-employee responds: Keep away from NCH

*Consumer Comment: Reputable Company?

*UPDATE EX-employee responds: Why you were really fired

*UPDATE Employee: Sounds like You are an ex employee

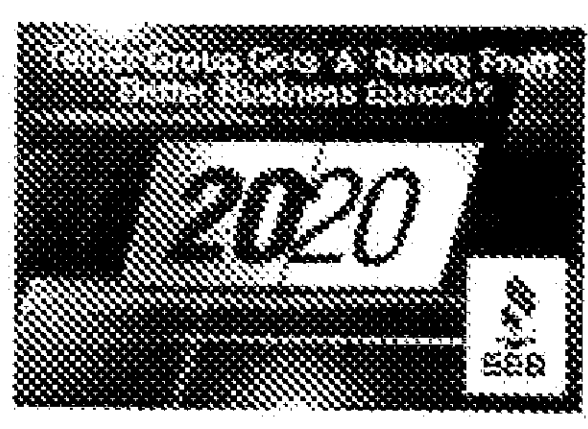
Recommend this on Google+ 5 | Tweet 3 | Like 5

REBUTTAL BOX | Respond to this Report

[Add Rebuttal to this Report](#) [Arbitrate & Set Record Straight](#)
[File New Report](#) [Repair Your Reputation](#)

This company advertises nationwide over several radio stations, including Michael Savage. This company will screw over its clients and employees. For example, a consultant will tell its client (who is merely thinking of starting a business) that he or she needs to have a corporation, corporate credit, a family security trust, a LLLP, and so on. This client is only THINKING about going into business.

Author: Consumer Employee/Owner



Does your business need a bad reputation? Fix it the right way. Corporate Advisors, Proven! SEO Reputation Management at its best!

The consultant will then push the client to buy right then and there for thousands. In case anyone who is reading this is unaware, a LLLP (Limited Liability Limited Partnership) is a legal entity set up to hold 1% of the stock of the newborn company, with the other 99% being held in the FST (Family Security Trust). Now WHY would someone need all of this when their corporate stock is worth absolutely nothing? The entities that they set up are also rarely set up correctly.

The credit program -- they don't actually have any proof that it works. They guarantee that you will have a AAA credit score in anywhere from 4-12 months for a small fee of either \$2500 or \$4000, or anywhere inbetween. How do they know the person has this credit score when they won't even pull the credit for the client to prove it and no one has finished the program?

The clients believe the consultants so much that several of them will be digging into their 401k or any kind of retirement fund just to pay for these entities. They advertise on the radio for corporate credit and a free book, only they won't send the free book if they don't think the person is going to buy.

The sales people will do anything to get the sale... anything, even insulting the potential client. The reason behind this is that they have a quota of \$6000 for the week and if not reached, the consultant is fired and told "it's just not working out". Employees are fired on a weekly basis.

There are about five people who have worked for this company more than a year, or even a year. They will fire people for any reason and give the reason that it's just not working out. The level of professionalism is unbelievable. The sales manager comes into the morning meeting usually swearing at the employees, setting a horrible example.

I would like to let everyone know that this company steals from anyone they can. They are the most unethical company I have ever been in contact with. I hope this helps anyone who reads it.

Also, if you need to set up a corporation and you want to do it in Nevada, just go to the Nevada Secretary of State website and they can guide you. If you're looking for business credit, go to Dun and Bradstreet directly.

Katie
Las Vegas, Nevada
U.S.A.

This report was posted on Ripoff Report on 06/01/2016 05:27 PM and is a permanent report located here: <http://www.ripoffreport.com/the-data-corp-credit-beatquarters-richlas-vegas-nevada>

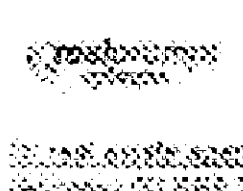
Learn more!
888-581-5816
Goldline
THE ALL-NEW 2013 Nissan PATHFINDER
STARTING AT \$28,650
CLICK FOR VIDEO
Sign Drive



Author: [Name]
 Location: [Location]
 Date: [Date]



Author: [Name]
 Location: [Location]
 Date: [Date]



Author: [Name]
 Location: [Location]
 Date: [Date]



Author: [Name]
 Location: [Location]
 Date: [Date]

Report Report in the Media



Report Report on [Topic]



Report Report on [Topic]



Report Report on [Topic]



Report Report on [Topic]



Report Report on [Topic]

[See more videos](#)

Special Features

Doctored Reviews

What patients don't know
 Why Medical Justice's are

Doctored Reviews is a website that provides reviews and ratings for medical services and products. It is a platform where patients can share their experiences and help others make informed decisions. The website is known for its detailed and often critical reviews of various medical services, including hospitals, doctors, and medical devices. It is a valuable resource for patients looking for quality care and for healthcare providers looking to improve their services.



The Democracy for the People logo is a symbol of the organization's commitment to transparency and accountability. It features a scale of justice, representing the organization's focus on ensuring that all people have a fair and equal voice in the political process. The logo is a powerful statement of the organization's values and its dedication to fighting for the rights of all citizens.



The BIBS logo is a symbol of the organization's commitment to supporting and empowering women. It features a stylized figure of a woman, representing the organization's focus on women's rights and issues. The logo is a powerful statement of the organization's values and its dedication to fighting for the rights of all women.

at least that is what he said his name was) who claimed to be some sort of dept. head since he had a whole 10 years of experience. He answered several of my questions and once I told him that I wanted to think about it and talk to my lawyer he attempted every high pressure ploy in the book - felt like I was buying a used car. He proceeded to claim that he had such vast knowledge in the field that he could "bury" any lawyer or CPA on the subject.

I don't like to hang up on anyone no matter who they are so, I told him no less than 10 times that I wanted to think about it and that I would call him back, although he was sure that I would never call back. This only fueled his arrogance and finally prompted him to tell me that if I did call again, he would make a note by my name that none of his sales people were to accept my \$997.00 if I decided to use them - he then hung up on me. If he was so sure I would never call back why did he say that? I would really like to see one of their salespeople actually refuse a payment from anyone! He also claimed that the time he spent with me on the phone he normally charged \$250.00 and hour for, however he did fail to tell me what type of qualifications he had to charge such a rate. Another claim he made was that NCH only would make \$50 of the deal!

He clearly did not want me to get off the phone and check into his company on sites such as this as then he knew I would never call back. Lusty is as fine an example of a con man who is so stupid they think everyone else is stupid.

FYI - Any legitimate salesperson/business will after 2 or 3 "no's" accept the "no" and will not fear for what you may find once you get off the phone or walk away from them. If you did happen to speak with these people - hopefully you didn't give them any \$ - if you did, dispute the charge immediately with your credit card company and they will see that you get your \$ back - even the all knowing Larry is no match for the credit card companies.

Respond to this report! [File a Rebuttal](#)

#3 Consumer Comment

Alternative and Trustworthy Incorporation Services

AUTHOR: Mental Midget Observer - (USA)

SUBMITTED: Tuesday, September 20, 2011

I find your opportunistic posting very unprofessional. That makes you the equivalent of being an ambulance chaser.

Do you crawl through the postings looking for opportunities? Look up the difference of "entrepreneur vs. opportunist!"

Respond to this report! [File a Rebuttal](#)

#4 Consumer Comment

Alternative and Trustworthy Incorporation Services

AUTHOR: Mental Midget Observer - (USA)

SUBMITTED: Tuesday, September 20, 2011

I find your opportunistic posting very unprofessional. That makes you the equivalent of being an ambulance chaser.

Do you crawl through the postings looking for opportunities? Look up the difference of "entrepreneur vs. opportunist!"

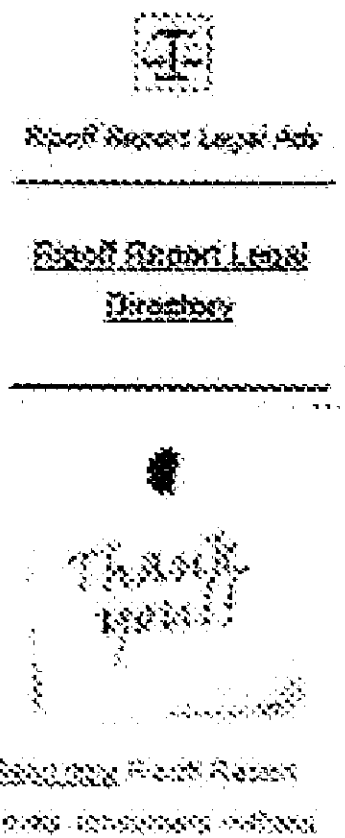
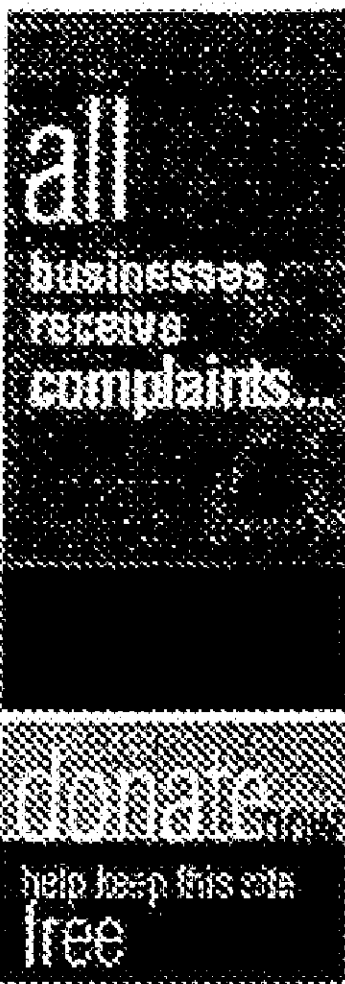
Respond to this report! [File a Rebuttal](#)

#5 Consumer Suggestion

Alternative and Trustworthy Incorporation Services

AUTHOR: MBe - (U.S.A.)

SUBMITTED: Wednesday, July 27, 2011



I'm president of Nationwide Incorporators and an attorney since 1972. Since starting my company in 1996 and exclusively providing entity formation services, I have been contacted by many former clients of NCH and similar NV-based incorporation services that promise tax advantages by incorporating in NV, misleading claims about privacy of officers, directors and shareholders, and unrealistic claims about obtaining credit lines for clients. Quite simply, there is absolutely NO tax advantage to incorporating in NV UNLESS the business is based and operates in NV! If the business is based in any other state and incorporates in NV, the business will still be subject to taxation in its home state—PERIOD! Confirm this with any accountant or tax attorney.

As an attorney, I can and do provide straightforward advice about advantages and disadvantages of S and C corporations, LLCs and other entities. Phone consultations are free, and information is also free to clients anytime after I form an entity for them. My company personalizes all forms and documents and processes with federal and state agencies. Everything is done completely and professionally. Feel free to contact Mike Ross at (800) 503-4443 or visit www.nationwide-incorporators.com.

Respond to this report! [File a Rebuttal](#)

#6 Consumer Comment

Thanks. I thought that was the story with NCH

AUTHOR: Gayle - (U.S.A.)

DATE POSTED: Tuesday, June 01, 2010

I know that you can incorporate via the internet through the Secretary of State's office for about \$150. I wondered what all the hype was. I will save a bundle now. Appreciate the info.

Respond to this report! [File a Rebuttal](#)

#7 Consumer Comment

I'm pulling my account

AUTHOR: Rob - (U.S.A.)

DATE POSTED: Wednesday, May 05, 2010

Holy mosby.

I've been reading the posts and am a current client of Nevada Corporate Headquarters and Integrated Tax Solutions who does my corporation and personal income taxes. I never realized the anger and level of unprofessionalism there. I doubt that my account is being professionally handled. I have my doubts and fears, now. My New York tax return was not filed properly and was corrected by an excellent employee of ITS in December who followed through and is no longer there. When I asked I was told he had a family emergency and had to leave. Hmmm. Sounds like a lie to me and obviously canned. I'm pulling my account, now because of a lack of response.

I attended the boot camp and never realized Cor's history. I do not want to be associated with a scam hag like this. He came off as friendly, but, wow, what a black history. Thank you Scotty, very much. I read your links. And, thank you Kafia. There's problems there.

The responses by the person called Sunshine tells me there's problems there. What I read, I'm pulling all my accounts and going with a competitor. If Sunshine, certainly an employee of Nevada Corporate Headquarters' attitude is any indication, I'm telling friends to leave and pull their accounts, too. Sunshine has a hateful attitude, not telling of a company that wants to serve its clients. Sunshine shape up, or the management there should ship you out. Sunshine you have a bad attitude. Holy matricial. And, they keep you on there? Tell me a lot about Nevada Corporate Headquarters.

Respond to this report! [File a Rebuttal](#)

#8 UPDATE EX-employee responds

Additional Information

AUTHOR: Scotty - (U.S.A.)

EXHIBIT G

1 Kurt K. Harris, Esq.
2 Nevada Bar No.: 5354
3 **HARRIS LAW OFFICE**
4 101 Convention Center Drive, Suite 700
5 Las Vegas, Nevada 89109
6 Tele: (702) 492-4909, Fax: (702) 405-2465
7 *Attorney/Corporate Representative*
8 *for Nevada Corporate Headquarters and*
9 *Cort Christie*

10 **JUSTICE COURT, LAS VEGAS TOWNSHIP**

11 **CLARK COUNTY, NEVADA**

12 NEVADA CORPORATE HEADQUARTERS,)
13 CORT CHRISTIE,) Case No.: 13A003332
14)
15 Plaintiffs,) **JC Department 7**
16)
17 vs.)
18)
19 PISSED CONSUMER, MEDIA RELATIONS,)
20)
21 Defendants.)

22 **OPPOSITION DEFENDANT OPINION CORP. D/B/A PISSED CONSUMER'S**
23 **MEMORANDUM IN SUPPORT OF SPECIAL MOTION TO DISMISS**

24 COMES NOW, Plaintiffs, NEVADA CORPORATE HEADQUARTERS and CORT
25 CHRISTIE, (hereinafter, NCH) by and through their attorney/Corporate Representative, KURT K.
26 HARRIS, ESQ., and hereby opposes Defendant's Special Motion to Dismiss ("Motion") as
27 follows:

28 This Opposition is made and based upon the memorandum of points and authorities
attached hereto, all papers and pleadings on file in this matter, and any arguments presented at the
time of hearing of this matter.

////

////

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 Defendant operates a website which is published in all states, particularly, Nevada. The
4 intention of Defendant's website is to get angry and often misguided persons to write claims,
5 which may or may not be true and correct. Defendant's very purpose is to solicit complaints and
6 not to serve as an aid to legitimate persons seeking to obtain information about a company or
7 service.
8

9 The very name, "PISSSED CONSUMER" denotes that the website seeks malcontents or
10 angry persons. If the name of the website were "Consumer Reports" or Consumer Ratings or
11 something of the like, it would not, by its very name, solicit a negative connotation. Clearly, the
12 very purpose of Defendant's website is to attract angry persons, be their mythical or legitimate, if
13 either? There is no way to verify one way or the other.
14

15 Due to the name and the nature of the solicitation, PISSED CONSUMER does not enjoy
16 the protections of the first amendment or 47 U.S.C Section 230. They have formed a business out
17 of soliciting angry consumers or mythical angry consumers. There is no way for them to prove
18 the same due to the fact that the postings on PISSED CONSUMER are all anonymous. PISSED
19 CONSUMER cannot hide behind the constitution since they are a business in the business of
20 providing angry posts and not legitimate consumer information.
21

22 **II. FACTS**

23 Plaintiff's claims are not barred by the Constitution nor are they barred by 47 U.S.C.
24 Section 230. Defendant formed their website with the very purpose of soliciting complaints, not
25 legitimate reports. They are not seeking positive reports, hence the name, "PISSSED
26 CONSUMER". They are soliciting the very negative and angry.

27 Defendant encourages complaints and since their site is anonymous, there is no way to
28

1 verify the truth or the falsity of any of the statements contained on the website. PISSED
2 CONSUMER could be making it all up. PISSED CONSUMER entices complaints so that they
3 may extract funds from businesses who want to mediate the problem in their homespun arbitration
4 program. If a company is willing to pay, they can have the negative post removed or rebutted.
5 Since this is the business model of PISSED CONSUMER, they do not enjoy the protections of the
6 First Amendment.
7

8 Contrary to Defendant's statement of the facts, pissedconsumer.com is not an online forum
9 designed for consumers to discuss their experiences. It is an online complaint forum. Due to the
10 name, they are not seeking discussion of experiences as is incorrectly set forth in their Motion.
11 Their very name belies the truth of their formation.

12 III. ARGUMENT

13 PISSED CONSUMER does not solicit free speech, they solicit negative speech. They
14 solicit complaints. They are not seeking unbiased referrals or information. They want only what
15 is bad. Moreover, there is no way to verify if any of the speech is even legitimate. PISSED
16 CONSUMER cannot hide behind the furtherance of free speech because they are not doing the
17 speaking. They have formed a website as a means from profiteering. If there are no complaints,
18 they would cease to exist, one would think. Therefore, there is a strong incentive for them to
19 either seek out complainers or potentially make up complaints, which cannot be validated.
20

21 Moreover, due to the nature and name of the site, PISSED CONSUMER has not, "in good
22 faith" furthered free speech. The service is provided for profit, not in good faith as is required by
23 Nevada Law, NRS 41.650. Since negative speech is their business, they cannot set forth that they
24 have immunity based upon the furtherance of free speech. This is not the case and the motion
25 should be denied.
26

27 Due to the anonymity contained in the website, there is no way to verify whether any of
28

1 the statements are true or false. The posts contained on the website with regard to NCH cannot be
2 verified internally and appear to be fabricated. Free speech cannot be fabricated. Defendant
3 should know this. Moreover, their site seeks to solicit biased speech at best and offers only one,
4 highly charged viewpoint, "PISSSED". This is their business. It does not serve a public service,
5 only themselves as they attempt to make money off of the posts.
6

7 Likewise, Defendant's allegations that somehow NCH's business practices are a matter of
8 public concern for the purposes of public reporting are misguided. There are not any allegations
9 which speak to business practice. They do not appear to be directed toward the public and
10 certainly have not been verified to any degree by Defendant. In reality, Defendant does not appear
11 to care whether the post is truthful or not.
12


13 V.

14 **CONCLUSION**

15 Based upon the foregoing, Defendant cannot hide behind the shield of the First
16 Amendment. Therefore, Plaintiffs respectfully requests this Honorable Court deny the Motion to
17 Dismiss.

18 DATED this 31st day of December, 2013.

19 HARRIS LAW OFFICE

20
21 
22 Kurt K. Harris, Esq.
23 Nevada Bar No.: 005354
24 101 Convention Center Drive, Suite 700
25 Las Vegas, NV 89109
26 (702) 492-4909
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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b) I hereby certify that I am an employee of HARRIS LAW OFFICE, and that on the 21ST day of December, 2013, I served a true and correct copy of the **OPPOSITION TO DEFENADNT'S MOTION TO DISMISS** by depositing for mailing, in a sealed envelope, U.S. postage prepaid, in Clark County, Nevada.

Laura Tucker, ESQ.
RANDAZZA Legal Group
3625 S. Town Center Drive
Las Vegas, Nevada 89135

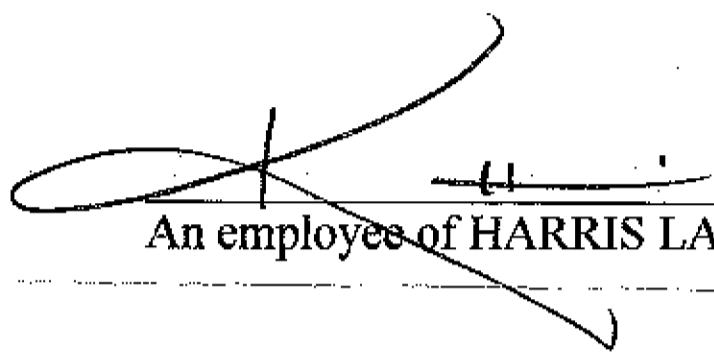

An employee of HARRIS LAW OFFICE

EXHIBIT H

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JUSTICE COURT, LAS VEGAS TOWNSHIP

CLARK COUNTY, NEVADA

NEVADA CORPORATE)
HEADQUARTERS, CORT CHRISTIE,)
Plaintiff,)

vs.)

PISSED CONSUMER, MEDIA)
RELATIONS,)
Defendants.)

CASE NO.: 13A003332
DEPT NO.: JC 7

SMALL CLAIMS COURT
SMALL CLAIMS REFEREE MOTION
MOTION TO DISMISS

Thursday, January 9, 2014
At 1:40 p.m.

At 200 Lewis Avenue, Department 5H
Las Vegas, Nevada

REPORTED BY: JEAN DAHLBERG, RPR, CCR NO. 759, CSR 11715

1 APPEARANCES:

2 PRESIDING JUDGE:

3 THE HONORABLE MELANIE MORGAN

4

5 For the Plaintiffs:

6 HARRIS LAW FIRM
7 BY: KURT K. HARRIS, ESQ.
8 101 Convention Center Drive, Suite 700
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12 kharris@702law.com

10

11 For the Defendants:

12 RANDAZZA LEGAL GROUP
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14 BY: LAURA M. TUCKER, ESQ.
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18 (702) 420-2003 (Facsimile)
19 mjr@randazza.com

16

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E X H I B I T S

21

NUMBER

DESCRIPTION

PAGE

22

(Exhibits were not offered.)

23

24

25

1 LAS VEGAS, NEVADA; THURSDAY, JANUARY 9, 2014

2 1:40 P.M.

3 -oOo-

4 Whereupon --

5 THE COURT: Nevada Corporate Headquarters, Cort
6 Christie versus Pissed Consumer, Media Relations.

7 MR. HARRIS: Good afternoon. Kurt Harris on
8 behalf of Cort Christie and Nevada Corporate
9 Headquarters.

10 THE COURT: Thank you.

11 MR. RANDAZZA: Good morning, Your Honor. Marc
12 Randazza on behalf of Pissed Consumer. And my
13 associate, Laura Tucker.

14 THE COURT: Thank you. This is the defendant's
15 motion to dismiss --

16 MR. RANDAZZA: It is, Your Honor.

17 THE COURT: All right. So I read through the
18 Motion and Opposition to Reply. It looks like the issue
19 is whether Pissed Consumer is protected as an
20 interactive service provider; correct?

21 MR. RANDAZZA: That is one part of it,
22 Your Honor, yes; so that's the first question. I think
23 that question is very easily answered in the
24 affirmative. There is a litany of case law that I could
25 tie everybody up here going through, or we have provided

1 it in our papers. We have provided some examples in our
2 courtesy binder for you.

3 So it is protected as an interactive service
4 provider. None of the content is provided by the
5 company. It simply operates like any other web site
6 that has interactive services such as Craigslist or eBay
7 or, you know, anything that you might be otherwise
8 familiar with.

9 So it seems that the plaintiffs' theory is that
10 because of its name, that takes it out of Section 230
11 protection. That argument has no foundation in the
12 statute, and it actually was raised previously in a
13 nearby state, in Arizona; and I have provided this case
14 to you and --

15 THE COURT: Is that the one that's about rip-off
16 reports?

17 MR. RANDAZZA: It is. Global Royalties versus
18 Excentric, yes. So that theory was -- I just don't see
19 how that takes any interactive service provider out of
20 the protection in the Section 230.

21 Now, this is not simply a motion to dismiss
22 under Section 230, but it is -- your courtroom has been
23 ennobled as the first courtroom to have the new
24 Anti-Slap Statute argued in it.

25 This statute provides that if a plaintiff brings

1 an action that impacts free-speech statutes, that it
2 must then show by clear and convincing evidence that it
3 can prevail. This statute was modeled after
4 California's, Oregon's, and Washington's, and I don't
5 think that they'd be able to do that because we get back
6 to Section 230.

7 So we are not only seeking dismissal, but we are
8 seeking reimbursement of our fees as provided for by
9 this new law.

10 THE COURT: All right. Plaintiffs.

11 MR. HARRIS: Thank you. May it please the
12 Court -- and I appreciate the opportunity to come here
13 and discuss this. And I've seen the case law, and I
14 know there's considerable amount of case law.

15 And obviously my client has concerns as to, I
16 think, everyone here in the courtroom and public because
17 you're in this position where you have these web sites
18 that name themselves negatively. And that's why I do --
19 that's why I believe that it doesn't fall within the
20 statute, as I stated in my opposition. Because they're
21 not soliciting free speech. They're soliciting negative
22 speech, just by the very connotation of the name of the
23 web site.

24 THE COURT: But can't free speech be negative?

25 MR. HARRIS: Absolutely. It could be. And

1 that's why if it is a case of Consumer Reports or some
2 kind of a nonsuggestive type of web site, I think it
3 does fall under that. I think you are fostering free
4 speech. I don't believe you have any immunity for
5 content that's going on in discussions by and between
6 parties on your Internet. I get that.

7 And I get where Google's at with that as well.
8 Because what is said on the Internet, you know, the
9 can't be responsible for that just because they provide
10 the platform. But here, the very platform is the
11 moneymaker. The platform is the business. They have
12 provided a business that is the platform, and that
13 business specifically solicits negative speech.
14 Wherein, if you don't like what's said about you on the
15 Internet, you can go on there and you can pay, and then
16 you're able to get that removed, or at least able to
17 post some kind of a rebuttal so long as you dole out
18 money.

19 Because Pissed Consumers, as well as some of
20 these other Internet providers, they're there to solicit
21 the negatives a means of providing profit. It's not
22 fostering free speech. It's not the public marketplace.
23 It's not out there speaking in the public and talking
24 and discussing freely ideas that are going back and
25 forth. It's specifically tailored and targeted towards

1 businesses, towards individuals, and towards people
2 where they are soliciting this information, which
3 whether they verify it or dont verify it.

4 There's no way for one to know where the URL
5 comes from, if it's legitimate or not. I'm not saying
6 that Mr. Randazza's client is illegitimate or isn't.
7 I'm --

8 THE COURT: Are you trying to say that they
9 participated in the comments in any way, or they just
10 provided the forum?

11 MR. HARRIS: I don't know, I guess, whether they
12 participate in the comments or not. They can post a
13 comment quite easily about you. There would be no way
14 to validate it. There's no way for you to know. They
15 can pretty much say anything about it, then hide behind
16 the shield of immunity and you can't get at it. You
17 can't find out whether it's legitimate or not
18 legitimate, as far as the comment goes.

19 THE COURT: Well, let me ask you this: Do you
20 have any case law that supports your theory that they
21 were encouraging -- because they were encouraging
22 negative feedback that it would nullify the immunity?

23 MR. HARRIS: No, I don't. And I realize I'm
24 here trying to create law. I'm trying not necessarily
25 trying to create law. I'm trying to -- we're looking at

1 this from a public service, a public protection policy,
2 in saying there's really no way to address it. There is
3 no case law out there specifically that said it's gone
4 the other direction. But there are suits, and they are
5 coming out and they are piling up. And there is some
6 protection of free speech, which we all appreciate and
7 we all know the importance of that.

8 But this isn't free speech. This isn't speech
9 out in the public place and people talking and
10 exchanging ideas. It's specifically solicited for the
11 intention of soliciting the business of people that's
12 being talked about in order to pay to participate in
13 their arbitration processes in order to try and clear
14 your name. Whether it's true or not true, it doesn't
15 make any difference.

16 And people are entitled to say whatever they
17 want to say. They have an opinion, and there's nothing
18 wrong with that. It's just that this very platform is
19 not a free speech platform. It doesn't fall to free
20 speech; it solicits negative speech for the very purpose
21 of making money. It is their business. It's how they
22 make money.

23 THE COURT: Yeah, I understand. I guess where
24 I'm getting caught up is that the solicitation of -- or
25 negative speech is also free speech.

1 MR. HARRIS: Absolutely. It is. And I'm
2 really -- I'm hanging onto Pissed Consumer. You know,
3 those aren't happy customers that are coming forward --

4 THE COURT: No.

5 MR. HARRIS: -- or people that are there to say
6 happy things. It's not a nonbiased, and I did cite in
7 my opposition a Consumer Reports kind of thing where
8 it's pretty generic. And if you go on Consumer Reports,
9 you're going to see negative speech about certain
10 businesses, and you're going to see positive speech.

11 THE COURT: But by that same token, wouldn't you
12 think that that would cause someone to read it and say,
13 Well, of course they're just on that web site. It
14 doesn't have credibility. It's called Pissed Report, as
15 opposed to Consumer Report, which has -- carries with
16 it, perhaps, more credibility?

17 MR. HARRIS: And one would very much hope that,
18 I guess. You can't believe everything you read. I
19 don't know how many times my parents have told me that,
20 and I've gone through life that way. One would hope
21 that.

22 It's just that by its very nature, when you try
23 to address it, and the only way that you're able to
24 provide your forum to express a -- to address it or to
25 have it removed or to do something about it, it requires

1 that you pay money.

2 THE COURT: I see.

3 MR. HARRIS: And that really is the big
4 difference here. It isn't a matter of just being able
5 to write a letter or somehow try to correct a statement
6 in the free speech forum. It requires you to pay to
7 participate to have that removed, whether it's true or
8 false. There's no way of knowing, and there's no way of
9 knowing where it comes from due to the unanimity of the
10 posting.

11 So we would just -- we would request for this to
12 move forward. We would like to do some discovery to see
13 if it is legitimate, to be able to at least address it
14 one way or another in some form, and have some ability
15 to participate without having the federal statutes
16 raised as a shield at all times, saying that somehow
17 this is a fostering of free speech when, in fact, it's
18 really a business.

19 And these web sites and more are popping up all
20 the time and will continue to flourish on the Internet.
21 They are a business and they're there to make money, and
22 it's not their fault it's free speech.

23 THE COURT: Nevada Corporation.

24 MR. RANDAZZA: Your Honor, if I may respond to
25 some of that.

1 Yes, this is a business, like Yelp, like
2 Craigslist, like any other interactive service provider.
3 And the proliferation of these sites that my colleague
4 has raised, well, that was Congress's intent these sites
5 to proliferate.

6 Now, he's saying that there's no way to know who
7 actually posted it. Well, there is. We do cases like
8 this all the time. You file against John Doe, you seek
9 a motion for early discovery, you get the IP
10 information, you get it from the service provider, and
11 then you proceed against the speaker.

12 The statements about my client charging to
13 respond are not true. If you look at Tab 2 in the
14 binder that I gave you -- I have a declaration from my
15 client -- they do not charge to take things down, they
16 do not charge for responses. In fact, they have been
17 offered significant amounts of money by companies, from
18 time to time, to take down negative reviews. They've
19 always refused. These reviews are not for sale.

20 Now, one thing that I -- I'm sorry, I only have
21 one copy, but I'll provide it to you -- this is the
22 actual page. And as you can see, there is an entire
23 discussion about this company, many different people
24 speaking about the company, many different screen names.
25 Some are saying things that are negative; some are

1 saying things that are positive. Some of them there
2 says that they used to work there and everything that
3 these people are saying about it is true; some people
4 are saying otherwise, that they got great service from
5 them.

6 I have no opinion of this company. My client
7 has no opinion of this company. The fact that -- you
8 know, the name of the site is really the last thing
9 we're down to here. And, you know, if this said, you
10 know, Shiny Happy Unicorn Consumer, I mean, would that
11 then put us into 1030 protection according to my
12 colleague's argument? That's really not what Congress
13 intended. That's not what any case law says. And the
14 reason that there is no case law on this side of the
15 table is because universally every case has knocked down
16 every one of these arguments.

17 Thank you.

18 THE COURT: All right. Are these the cases that
19 are cited to? Are these just copies of cases?

20 MR. RANDAZZA: Yes. We have our pleadings in
21 here, and I've given you a copy of Giordano versus
22 Romero. That's one from the Court of Appeals in
23 Florida.

24 THE COURT: Uh-huh.

25 MR. RANDAZZA: You know, it's certainly not

1 binding here. But in that one, that's dealing with a
2 web site called Ripoff Report, which Your Honor may or
3 may not be familiar with.

4 THE COURT: Oh, yeah, I read something about it.

5 As long as -- what I'm trying to get at is: If
6 these are cases that are cited in your briefing, then I
7 don't need this and I'll give it back to you.

8 MR. RANDAZZA: Okay.

9 THE COURT: I don't want to unnecessarily make
10 this more document-intensive than it needs to be. So I
11 can look these up.

12 MR. RANDAZZA: Thank you.

13 THE COURT: What I'm going to do is issue a
14 written ruling, and you'll get it in about a week or so.

15 MR. RANDAZZA: Thank you very much, Your Honor.

16 MR. HARRIS: Thank you very much, Your Honor.

17 THE COURT: Thank you.

18 (Thereupon the proceedings were adjourned at
19 1:51 p.m.)

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CERTIFICATE OF REPORTER

STATE OF NEVADA)
)SS:
COUNTY OF CLARK)

I, Jean M. Dahlberg, a duly commissioned and licensed Court Reporter, Clark County, State of Nevada, do hereby certify:

That I reported in shorthand (Stenotype) the proceedings had in the above-entitled matter at the place and date indicated.

That I thereafter transcribed my said shorthand notes into typewriting, and that the typewritten transcript is a complete, true and accurate transcription of my said shorthand notes.

IN WITNESS HEREOF, I have hereunto set my hand, in my office, in the County of Clark, State of Nevada, this 14th day of January, 2014.

JEAN M. DAHLBERG, RPR, CCR 759, CSR 11715

IAFD

Marc J. Randazza (Nevada Bar No. 12265)
J. Malcolm Devoy IV (Nevada Bar No. 11950)
RANDAZZA LEGAL GROUP
3625 S. Town Center Drive, Suite 150
Las Vegas, NV 89135
Telephone:888-667-1113
Fax: 305-437-7662
ecf@randazza.com

Counsel for Plaintiff

IN THE DISTRICT COURT
FOR THE STATE OF NEVADA, COUNTY OF CLARK
EIGHTH JUDICIAL DISTRICT

OPINION CORP., a New York corporation)
d/b/a PISSED CONSUMER,)
Plaintiff,)
vs.)
NEVADA CORPORATE HEADQUARTERS,)
INC., a Nevada corporation,)
Defendant.)

Case No.: _____

**INITIAL APPEARANCE FEE
DISCLOSURE**

[NEV. REV. STAT. CH. 19]

1 **INITIAL APPEARANCE FEE DISLCOSURE (N.R.S. CHAPTER 19)**

2 Pursuant to Nevada Revised Statutes Chapter 19, as amended by Senate Bill 106, filing fees
3 are submitted for parties appearing in the above entitled action as indicated below:
4

New Complaint Fee	1st Appearance Fee
<input type="checkbox"/> \$1530 <input type="checkbox"/> \$520 <input type="checkbox"/> \$299 <input checked="" type="checkbox"/> \$270.00	<input type="checkbox"/> \$1483.00 <input type="checkbox"/> \$473.00 <input type="checkbox"/> \$223.00

7 Name: OPINION CORPORATION, d/b/a
8 PISSED CONSUMER

9 X \$270

10 \$30

11 Total of Continuation Sheet Attached \$

12 TOTAL REMITTED: Total Paid \$ 270

13 Dated: March 26, 2014 Respectfully submitted,

14 Marc J. Randazza

15 RANDAZZA LEGAL GROUP

16

17 By: /s/ Marc J. Randazza
18 Marc J. Randazza
19 J. Malcolm DeVoy

20 Attorneys for Plaintiff

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Counsel for Plaintiff

IN THE DISTRICT COURT
FOR THE STATE OF NEVADA, COUNTY OF CLARK
EIGHTH JUDICIAL DISTRICT

OPINION CORP., a New York corporation,
d/b/a/ PISSED CONSUMER,

Plaintiff,

vs.

NEVADA CORPORATE HEADQUARTERS,
INC., a Nevada corporation

Defendant.

Case No.: _____

Dept. No.: _____

DISCLOSURE STATEMENT

[NEV. R. CIV. PROC.7.1]

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DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Nevada Rules of Civil Procedure, Plaintiff Opinion Corporation here discloses that it has no parent corporation or any publicly held corporation owning 10% or more of its stock.

Dated: March 26, 2014

Respectfully submitted,

Marc J. Randazza
RANDAZZA LEGAL GROUP

By: /s/ Marc J. Randazza
Marc J. Randazza
J. Malcolm DeVoy

Attorneys for Plaintiff,
Opinion Corp.