

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

GLOBAL DIRECT SALES, LLC, PENOBSCOT)
INDIAN NATION, CHRISTOPHER RUSSELL)
and RYAN HILL,)

Case No.: 8:08-cv-02468

Plaintiffs,)

-v-)

**DECLARATION OF
AARON KROWNE**

AARON KROWNE, individually and d/b/a THE)
MORTGAGE LENDER IMPLD-O-METER and)
ML-IMPLD.COM, KROWNE CONCEPTS,)
INC., IMPLD-EXPLODE HEAVY)
INDUSTRIES, INC., JUSTIN OWINGS, KRISTA)
RAILEY, STREAMLINE MARKETING, INC. and)
LORENA LEGGETT,)

Assigned:

Hon. Deborah K. Chasanow

Defendants.)

**DECLARATION OF AARON KROWNE IN SUPPORT OF
KROWNE CONCEPTS, INC. & IMPLD-EXPLODE HEAVY INDUSTRIES, INC.’S
MOTION FOR JUDGMENT PURSUANT TO RULES 12(c) and 56**

I, Aaron Krowne, declare:

1. I am over 18 years of age and competent to testify in the matters below based on my personal knowledge.
2. I make the following statements based on my personal knowledge. If called to testify under oath in a court of law as to the matters set out herein, I could and would do so truthfully.
3. I am the chief executive officer of Implode-Explode Heavy Industries, Inc. and Krowne Concepts, Inc., both defendants in the present action.
4. The website at issue here, in its “About the Mortgage Lender Implode-O-Meter” page (<http://www.ml-implode.com/about.html>) held itself out as providing coverage of “the

housing finance sector, the economy and the country,” with a unique focus on the collapse of the mortgage industry as it existed.

5. Attached as Exhibit A are printouts of 11 ML-Implode Web discussion forum posts by Krista Railey (under the account name “Do_the_math”) critical of Green Credit Solutions (“GCS”). These posts are still and have always been public. The individual posts can be accessed on the World Wide Web at the URLs at the bottom right of each corresponding page.
6. The above posts are easily findable with searches for “GCS” or “Green credit” on the ML-implode.com forum system (<http://forum.ml-implode.com/search.php>), or with Google, using a site search restricted to ml-implode.com.
7. A web-wide Google search done at 10:37am, Saturday, August 17, 2013, for “green credit solutions implode” turned up as the first result the forum thread “BULLSH*T? - GREEN CREDIT SOLUTIONS?”, from which the core of Krista's anti-GCS posting originates.
8. IEHI editorial and forum moderation staff was always aware that these posts (and other Railey material critical of GCS) were public and easily-findable on the ML-Implode site(s).
9. While at times some of Railey's posts were adversely-moderated (moved to other public or non-public sections), this had the aim of keeping the overall forum discussion civil, not suppressing criticism of Green Credit. As the above posts demonstrate, it would be impossible for IEHI to be “suppressing criticism of GCS” while still leaving these posts public, given their quantity and “thrust.”
10. After Railey had communicated her concerns about GCS to I and other IEHI staff, her complaints were exhaustively followed up on, both with GCS and California Regulatory

Authorities. IEHI judged from the sum total of the responses and information from these sources that GCS was doing nothing ethically wrong and was legally-compliant with all applicable laws and regulations.

11. When I and other IEHI staff communicated this conclusion to Railey, she became hostile and aggressive, necessitating the forum moderation moves made against her.
12. When Railey persisted, rather than attempt to dissuade her from doing anything further, I suggested she follow up directly with the pertinent regulators with her remaining concerns. My sentiment, also expressed to her, was that it was clearly beyond IEHI's capability to further "adjudicate" a matter that was highly-specialized, had to do with the emerging area of large-scale loan modifications, and was completely within one state's complex and nuanced regulatory purview.

Pursuant to 28 USC § 1746, I declare under penalty of perjury under the laws of the State of Maryland and the United States that the foregoing is true and correct, and that this declaration was executed on August 17th, 2013 in Alexandria, VA.

A handwritten signature in black ink, appearing to read 'Aaron Krowne', written over a horizontal line.

Aaron Krowne