

1 DAVID C. SHONKA
2 Acting General Counsel

3 SARAH SCHROEDER, Cal. Bar No. 221528
4 ROBERTA TONELLI, Cal. Bar No. 278738
5 EVAN ROSE, Cal. Bar No. 253478
6 Federal Trade Commission
7 901 Market Street, Suite 570
8 San Francisco, CA 94103
9 sschroeder@ftc.gov, rtonelli@ftc.gov, erose@ftc.gov
10 Tel: (415) 848-5100; Fax: (415) 848-5184

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

12 FEDERAL TRADE COMMISSION,

13 Plaintiff,

14 vs.

15 AMERICAN FINANCIAL BENEFITS
16 CENTER, a corporation, also d/b/a AFB and AF
17 STUDENT SERVICES;

18 AMERITECH FINANCIAL, a corporation;

19 FINANCIAL EDUCATION BENEFITS
20 CENTER, a corporation; and

21 BRANDON DEMOND FRERE, individually
22 and as an officer of AMERICAN FINANCIAL
23 BENEFITS CENTER, AMERITECH
24 FINANCIAL, and FINANCIAL EDUCATION
25 BENEFITS CENTER,

26 Defendants.

Case No. 4:18-cv-00806-SBA

**DECLARATION OF LIBERTY
HOLTON IN SUPPORT OF
FEDERAL TRADE COMMISSION'S
MOTION FOR PRELIMINARY
INJUNCTION**

DECLARATION OF LIBERTY HOLTON

1
2 1. My name is Liberty Holton. I am a paralegal specialist for the Federal Trade
3 Commission. As an FTC paralegal, my duties include investigating persons or companies
4 suspected of engaging in deceptive practices in violation of the Federal Trade Commission Act
5 and other laws or rules enforced by the FTC. The following statements are within my personal
6 knowledge and if called as a witness I could and would competently testify thereto.

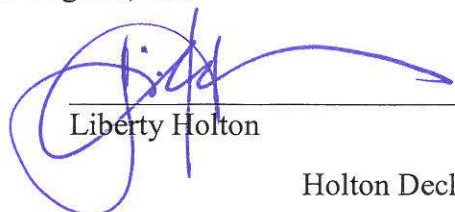
7 2. On February 6, 2017, the FTC's Bureau of Consumer Protection authorized me to
8 tape record telephone conversations, preambles, and other messages during calls placed to or
9 received from phone numbers associated with American Financial Benefits Center and related
10 entities.

11 3. On March 2, 2017, I placed an undercover call to (888) 402-4006. This toll free
12 number appeared on a student debt relief mailer. Attached hereto as **Holton Attachment A** is a
13 true and correct copy of my March 2, 2017 undercover call recording to (888) 402-4006.

14 4. On April 25, 2017, For The Record, Inc., an independent court reporting
15 company, provided a transcript of my March 2, 2017 undercover call. I reviewed the transcript
16 for accuracy and attached hereto as **Holton Attachment B** is a true and correct transcript of my
17 undercover call to (888) 402-4006.

18 5. The representative who answered my March 2, 2017 call to (888) 403-4006 told
19 me he would email me information about the student debt relief company he worked for. I gave
20 the representative my undercover email account. On March 2, 2017, I received an email at my
21 undercover account from an Ameritech Financial email account. The email was titled "Student
22 Loan Relief Info." Attached hereto as **Holton Attachment C** is a true and correct copy of the
23 March 2, 2017 email I received from Ameritech Financial, with my undercover email address
24 redacted.

25 6. I declare under penalty of perjury that the foregoing is true and correct. Executed
26 on May 17, 2017, in Los Angeles, CA.

27
28 
Liberty Holton

Holton Declaration

Holton Attachment A is in physical form only, and maintained in the case file at the Clerk's office.

If you are a participant on this case, this Attachment will be served in physical form.

For information on retrieving this filing directly from the court, please see the court's main web site at <http://www.cand.uscourts.gov> under Frequently Asked Questions (FAQ).

This Attachment was not efiled for the following reason:

Non Graphical/Textual Computer File (audio, video, etc.) on CD or other media.

Holton Attachment B

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OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO. 1723027

TITLE AMERICAN FINANCIAL BENEFITS CENTER

DATE RECORDED: MARCH 2, 2017

TRANSCRIBED: APRIL 25, 2017

PAGES 1 THROUGH 25

TELEPHONE CALL TO AMERICAN FINANCIAL BENEFITS CENTER

WS710083

For The Record, Inc.

(301) 870-8025 - www.ftrinc.net - (800) 921-5555

FEDERAL TRADE COMMISSION

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RECORDING:

PAGE:

Telephone Call

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FEDERAL TRADE COMMISSION

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In the Matter of:)
American Financial Benefit) Matter No. 1723027
Services)
-----)

March 2, 2017

The following transcript was produced from a digital file provided to For The Record, Inc. on April 6, 2017.

For The Record, Inc. (301) 870-8025 - www.ftrinc.net -
(800) 921-5555

P R O C E E D I N G S

- - - - -

MS. HOLTON: My name is Liberty Holton. I am a paralegal specialist with the Federal Trade Commission in Los Angeles, California, and this is a taping session. Today is March 2nd, 2017, and the time is approximately 12:22 p.m. I am preparing to call American Benefits Center. The phone number I will be dialing is 1-888-402-4006.

TELEPHONE CALL FROM LIBERTY HOLTON

RECORDING: This call may be recorded for quality and training purposes. Thank you for calling. To speak with an account specialist regarding an important notice you've received, please stay on the line. Thank you for your patience. The next available representative will be with you shortly.

RECORDING: Hold for the next available agent.

(On-hold music.)

SHANE: Good afternoon. This is Shane. How can I help you?

MS. HOLTON: Hi, Shane.

SHANE: Mm-hmm.

MS. HOLTON: I received a postcard in the For
The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

1 mail, and I wanted to get more information on student
2 loan payment reduction.

3 SHANE: Sure, I can help you with that. Is
4 there a reference number on there that you can read
5 off for me, please?

6 MS. HOLTON: Well, I don't have it with me.
7 I'm currently at work.

8 SHANE: Gotcha, okay. What is your first
9 name, please?

10 MS. HOLTON: [REDACTED].

11 SHANE: All right, and the spelling of your
12 last name, please?

13 MS. HOLTON: [REDACTED] [sic], [REDACTED].

14 SHANE: Okay. And you said [REDACTED], I [REDACTED]
15 [REDACTED]

16 MS. HOLTON: That's correct.

17 SHANE: Okay. All right. And what -- what
18 state are you in, [REDACTED]?

19 MS. HOLTON: I'm sorry? Los Angeles.

20 SHANE: What state are you in?

21 MS. HOLTON: Oh, California. California.

22 SHANE: California, gotcha, okay.

23 Is that nice, California?

24 MS. HOLTON: I'm sorry? Los Angeles,

25 California, sir. For The Record, Inc. (301) 870-8025 -

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1 SHANE: Los Angeles, okay. Well, we have
2 two [REDACTED] here, one in Van Nuys and then the
3 other one -- anyhow, I'll just -- I'll jump right to
4 it and let you know why you got the letter. So the
5 reason you got the notification is because the federal
6 loans that you have in your name may be eligible to
7 take advantage of benefits that are being offered
8 through the Department of Education for payment
9 reduction and potential loan forgiveness. Okay?

10 MS. HOLTON: Okay.

11 SHANE: So, essentially, the repayment plans
12 are designed to make your student loan debt more
13 manageable by reducing your monthly payment. And what
14 happens is after you make a series of what they call
15 qualified minimum payments, okay, that's going to be
16 decided by the Department of Education based on
17 qualifiers.

18 After making a series of qualified minimum
19 payments for either 10 or 25 years, depending on the
20 program you qualify for, any remaining balance is what
21 may be eligible for forgiveness by the Department of
22 Education, after you've satisfied those payments.
23 Okay?

24 MS. HOLTON: Okay.

25 SHANE: So what we do -- the reason we sent For
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1 you the notification is because we work with our
2 clients directly, and we prepare the application for
3 them, we help them fill out all the federal
4 documentation, and then, ultimately, we submit the
5 package to the Department of Education on your behalf.
6 Okay?

7 MS. HOLTON: Okay.

8 SHANE: So, essentially, just for the sake
9 of time, I'll just kind of cut right down to it. I
10 understand you're at work, so I don't want to suck up
11 too much of your time.

12 MS. HOLTON: Thank you.

13 SHANE: I'll just ask you a few questions to
14 determine if you might qualify and figure out what
15 benefits are available, and we can just kind of go
16 from there.

17 MS. HOLTON: Sure.

18 SHANE: All right. So we have your home
19 address here of [REDACTED] [REDACTED]?

20 MS. HOLTON: No. It's [REDACTED].

21 SHANE: Okay. Is [REDACTED] one or two
22 words?

23 MS. HOLTON: [REDACTED] is one word.

24 SHANE: Okay. And you said the city was Los
25 Angeles, correct?

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1 MS. HOLTON: That's correct.

2 SHANE: Okay. We're in the same time zone.

3 We're in Sacramento.

4 MS. HOLTON: I'm sorry?

5 SHANE: Not too far. I said same time.

6 We're in Sacramento.

7 MS. HOLTON: Oh, great.

8 SHANE: All right. And the phone number
9 you're calling in on, is that the best number to reach
10 you at generally, or do you have another one you
11 prefer to put on file.

12 MS. HOLTON: It's -- what do you have on --
13 that's showing there?

14 SHANE: [REDACTED].

15 MS. HOLTON: That's correct. That's a good
16 number.

17 SHANE: Okay. Okay. All right, so
18 (inaudible) do you have an idea of about how much you
19 owe in federal student loans exactly?

20 MS. HOLTON: Let me see --

21 SHANE: We have an estimate of about 42,000,
22 and I just wasn't sure if that was correct.

23 MS. HOLTON: It's -- around that area, yes.

24 SHANE: Okay. And what are your monthly

25 payments currently? For The Record, Inc. (301) 870-8025

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1 MS. HOLTON: Currently, I am paying about
2 350.

3 SHANE: Okay. And do you by chance know who
4 your loan servicer is?

5 MS. HOLTON: Yes, it's Navient.

6 SHANE: Okay. And as far as you're aware,
7 all of your loans are current, nothing is delinquent
8 or in default, correct?

9 MS. HOLTON: That's correct.

10 SHANE: Okay. All right, and then what is
11 it that you do for a living? What's your occupation
12 title?

13 MS. HOLTON: Well, I work for a private
14 company, entertainment, in marketing.

15 SHANE: Is that your job title,
16 entertainment and marketing?

17 MS. HOLTON: Yes.

18 SHANE: Okay. All right, and the name of
19 the employer you work for?

20 MS. HOLTON: I'm sorry?

21 SHANE: The name of your employer?

22 MS. HOLTON: Well, I -- I didn't want to
23 disclose too much information until I get more info on
24 -- regarding this company.

25 SHANE: Okay. Well, what would you -- what For

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1 would you like to know? I apologize. I don't mean to

2 --

3 MS. HOLTON: Yeah.

4 SHANE: -- I don't mean to sound short or
5 anything like that. We're just exceptionally busy
6 here, and we have a very, very high volume of -- of
7 individuals that call in. So the process that we have
8 is very streamlined, and it's very -- it's very --

9 MS. HOLTON: Okay. Well, I'm trying to
10 figure out --

11 SHANE: -- strategic, so to speak, so if you
12 need -- so if you need more time to -- to think about
13 it or research the company, I'd be more than happy to
14 send you an email with some (inaudible) links that we
15 have to AFSLR, which is the Association for Student
16 Loan Relief. It's an organization. It's a nonprofit
17 organization that backs us up as far as what we do and
18 who we are.

19 You can read some articles in regards to one
20 of our certified associations, actually a multitude of
21 them. We're also recommended by the College Investor.
22 If you've never heard of them, it's a publication that
23 basically helps guide and direct college students or
24 graduates in terms of how to get loan relief and
25 things of that nature, basically educate people on

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1 things they weren't educated about. So let's go that
2 route because at this point I just -- I don't want to
3 make anybody feel uncomfortable about anything that
4 we're doing, and if you're not willing to divulge
5 employment information, then you're definitely not
6 going to want to give me anything else regarding --

7 MS. HOLTON: Well, I -- I'm just checking to
8 see --

9 SHANE: -- figuring out whether we can help
10 you or not, so --

11 MS. HOLTON: Okay. Shane, what -- basically
12 what I'm trying to get info on is what sort of program
13 am I qualified for.

14 SHANE: I'm sorry, your phone was a little
15 muffled. Do you mind repeating that?

16 MS. HOLTON: Oh, I'm sorry. What sort of
17 program am I qualified for?

18 SHANE: Well, essentially, that's why I'm
19 going through the questionnaire that I am now, to
20 figure that out.

21 MS. HOLTON: Well, with the information that
22 I gave you, the loan amount --

23 SHANE: Well, I still need -- yeah, so
24 there's a few other things that I still need in order
25 to figure out what you qualify for. These -- and mind

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For

1 you, these are not our programs, okay? These are
2 federal programs, so there's a mandate that we have to
3 follow in order to figure out what somebody qualifies
4 for.

5 So that's just -- that's unfortunately just
6 the way that it goes. So there's something called
7 family size that we need to discuss. We need to know
8 roughly what your income is, what your marital status
9 is, whether your spouse makes money, things of that
10 nature because these are all income-based repayment
11 programs.

12 MS. HOLTON: Oh, okay.

13 SHANE: So they're offered through the
14 federal government, so that's -- that's how this
15 works.

16 MS. HOLTON: Okay.

17 SHANE: So we also have to make sure, you
18 know, of certain things. The reason we ask for
19 employment information is because depending on the
20 type of industry and the type of employment that you
21 have, you may qualify for additional benefits, all of
22 which, you know, I'm not just -- not just going to
23 throw numbers at you and -- and hope that you like
24 what -- what we have to say and build fluff. That's -

25 - that's not what we're about. For The Record, Inc.

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1 So as I mentioned, you know, we -- we also
2 have a reputation to uphold as far as reliable
3 information being given.

4 MS. HOLTON: Okay.

5 SHANE: So I'll tell you what, what's the
6 best email that you have, and I can go ahead and just
7 shoot you over some information, give you some
8 opportunity to do some research.

9 MS. HOLTON: Okay.

10 SHANE: And if you have any questions, write
11 them down, and if you feel necessary, go ahead and
12 give me a call back.

13 MS. HOLTON: Okay.

14 SHANE: And I can be more than happy to go
15 from there with you.

16 MS. HOLTON: Okay. Oh, I -- oh, geez, I
17 need to get the information soon so that I can talk to
18 my husband in terms of what I can do with this loan.
19 Okay.

20 SHANE: Okay, well, how about this, I'll
21 tell you what. Because I have -- I have about seven
22 other calls in my queue, and I apologize to rush you,
23 but I just -- like I said, I got to kind of keep the
24 ball rolling here. Do you have a pen and paper, I'll
25 go ahead and give you my direct information and the

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1 company's name, and you can go ahead and research us
2 on your own at a later date and time.

3 MS. HOLTON: So if you were to -- okay. If
4 you need my company name, I -- I work for Paramount
5 Pictures. Does that help?

6 SHANE: Sure. That's fine. But -- but like
7 I said, [REDACTED], I'll just go ahead and give you my
8 information.

9 MS. HOLTON: Sure.

10 SHANE: Give you an opportunity to speak
11 with your husband and do some research on the program.
12 We'll give you some links to government websites that
13 you can go to and just build your knowledge a little
14 bit better, and that way I'll also give you an
15 opportunity, if you have any questions later on, we
16 can address those at that time.

17 MS. HOLTON: So I still have additional
18 questions, though.

19 SHANE: Mm-hmm, sure.

20 MS. HOLTON: Is this a government agency?

21 SHANE: No. No, absolutely not. We're a
22 standalone, third-party service, very much like the
23 company that you make a payment to now, Navient.
24 They're not affiliated with the government or the
25 Department of Education either. As a matter of fact,

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For

1 they're a third-party, for-profit debt collector
2 that's been contracted by the Department of Ed to
3 retain payment from you.

4 So because how -- how this works, the reason
5 that loan servicers even exist is because there's not
6 enough financial resources within the federal
7 government to delegate to collect debt, so they hire
8 out these companies and pay them, you know, a service
9 fee for doing what they do.

10 MS. HOLTON: Hmm.

11 SHANE: The service fee is essentially the
12 interest that you -- that you pay on your loan, goes
13 to Navient, and the remainder goes to the Department
14 of Education towards your loans.

15 MS. HOLTON: Oh, okay. Well, geez. So --
16 so currently I am paying around 350 for my loan
17 payment with Navient. Is there any way -- I mean, I'm
18 just kind of curious in terms of what my cost, if I
19 was to --

20 SHANE: Right, right. And that's -- that's
21 what I was getting into. The questions that I asked
22 you --

23 MS. HOLTON: Oh, okay.

24 SHANE: -- are -- there's a strategy to it.

25 MS. HOLTON: Oh, okay. For The Record, Inc.

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1 SHANE: So --

2 MS. HOLTON: Oh, okay. Let's --

3 SHANE: -- (inaudible) -- so if there's --
4 you know, if you're not comfortable divulging basic
5 information, then there's no way we'll be able to
6 figure out --

7 MS. HOLTON: Well, I -- what sort of basic
8 information --

9 SHANE: -- what we can do for you?

10 MS. HOLTON: -- what sort of basic
11 information do you need? Let's -- let's get, you
12 know...

13 SHANE: Okay. Well, I need to have an idea
14 of about what you and your husband make annually
15 individually. So we'll start there.

16 MS. HOLTON: Well, I make around -- sheesh,
17 \$110, okay, annually.

18 SHANE: Yeah, annually?

19 MS. HOLTON: Mm-hmm.

20 SHANE: I'm -- I'm sorry, I didn't get that
21 number for you.

22 MS. HOLTON: Yes. Yes. 1 1 0. 110.

23 SHANE: Gotcha. All right. And do you have
24 an idea of about how much your husband makes annually?

25 MS. HOLTON: My husband, I believe is maybe

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1 around -- last time -- 80,000.

2 SHANE: Okay. And -- and you guys obviously
3 file your taxes jointly, correct, together?

4 MS. HOLTON: Yes.

5 SHANE: Okay. All righty. Well, I can tell
6 you -- I can tell you right now that because you guys
7 file your taxes jointly and your income is so
8 significant, the -- this program is really not going
9 to yield any sort of a benefit to you. The number I
10 have here right now -- and remember, these programs
11 are based on income, okay? So it has nothing to do
12 with, you know, anything else aside from primarily
13 income. So the number that is pulling up right now,
14 just based on your income, not combined income, is a
15 payment of 1,834.65, which provides zero benefit to
16 you if you're already paying \$350 a month.

17 MS. HOLTON: Hmm. Wow.

18 SHANE: So that -- yeah, so that -- that
19 absolutely makes no sense. The only other way to --
20 so there's one other option here, and even with this
21 option being at its maximum potential, you're still
22 looking at a payment of about \$765 per month, so even
23 then. So there's two primary -- three primary things
24 that these programs go off of. One is your income,
25 and the other is your type of employment, and then the

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1 third is something called family size.

2 Now, family size, according to the
3 Department of Education, is very different than what
4 the IRS considers family size, okay? So when you're
5 filing your taxes, your family size would pertain to
6 only your spouse and your dependents. Well, according
7 to the Department of Education, when they mean the
8 word family size, what they mean by that is anybody
9 that receives a form of help, aid, assistance, or
10 support from you and/or who may be living with you in
11 addition to your dependents. Okay?

12 Now, the maximum number that the Department
13 of Education allows for any one single individual or a
14 couple to state is the number 14. That's the highest
15 that they'll go. Or that's the highest that they'll
16 allow you to state that you help, okay? So just
17 running the numbers with a -- if you and your husband
18 were to file your taxes separately and we were just
19 going off of your \$110,000 annual income --

20 MS. HOLTON: Mm-hmm.

21 SHANE: -- with a family size of 14, you're
22 still looking at a payment of 775.64 per month. So in
23 which case obviously provides no -- no financial
24 benefit or relief to you. So, you know, in that case,
25 this program would absolutely not be a good fit for

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1 you.

2 MS. HOLTON: Great. Well, hmm.

3 SHANE: So, quite honestly, your best would
4 just be stay doing what you're doing. Well, here's --
5 here's also the other downside, okay? Because you
6 work -- because you don't work for a nonprofit or a
7 publicly funded organization, okay, you wouldn't --
8 you would qualify for a 25-year repayment program,
9 okay? The program -- the payment program you're in
10 right now, making a \$350 payment on this \$42,000 loan
11 roughly, you're on a ten-year repayment term. So that
12 would be the other downside.

13 And it wouldn't make sense for us to put you
14 in a program that extends out your loan term for 15
15 additional years. That -- that in itself is not
16 providing a benefit to our client. So that -- that in
17 itself isn't -- isn't helping you in any way, shape,
18 or form, aside from the amount of income that you
19 make.

20 So to be quite frank with you, I think that
21 the situation you're in right now is probably going to
22 be the best opportunity that you have for these loans.

23 MS. HOLTON: Hmm, okay. Hmm. All right.

24 Okay, Shane. I guess that's the best. I guess
25 there's nothing else you guys can do for me, then.

For

26 The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

1 Okay. Hmm. Well, thank you so much for your call.

2 SHANE: All right, well -- yeah, of course.

3 You're very welcome. I apologize that we weren't able
4 to do more for you, but if you ever have any questions
5 or comments, concerns about anything, you know, down
6 the road, please feel free to give us a call back.
7 We're always willing to help out in any way that we
8 can.

9 If there's anyone else that you know that
10 might be in a financially stressful situation and
11 maybe not able to afford their payment, or maybe
12 they're just out of school and kind of getting their
13 feet wet with their new career or what have you, you
14 know, we -- we would love the opportunity to try and
15 help them out and to educate them and keep them out of
16 hot water.

17 MS. HOLTON: Mm-hmm, I see. Okay, you know,
18 your postcard, when I saw it, which I left at home,
19 there's a BBB-approved -- are you guys approved by
20 BBB?

21 SHANE: No. Well, that's actually a really
22 good question. I'm glad you asked because here's the
23 thing. As of last July, we discontinued our
24 involvement with the Better Business Bureau.

25 MS. HOLTON: Hmm. For The Record, Inc. (301)
26 870-8025 - www.ftrinc.net - (800) 921-5555

1 SHANE: Simply because -- and this is what
2 we found out through -- and we were a long-time member
3 of the Better Business Bureau -- until they basically
4 told us that they -- we -- we currently service over
5 32,000 clients in the United States alone, okay, so
6 we're very widespread, service a very widespread
7 business. And we're very well known in the community
8 of document preparation and student aid relief and all
9 that kind of stuff.

10 The way that the Better Business Bureau
11 works is, one, they're not one corporate entity, and
12 they're individually -- it's a franchise. So it's
13 individually ran by region and by area, okay? Well,
14 the Better Business Bureau that we were registered
15 with in our local area basically told us -- and this
16 is the way that the BBB works -- is someone can have
17 terrible service, they can provide horrible -- they
18 can have horrible reviews and still be registered with
19 an A-plus rating because they paid for one.

20 Now, that didn't match up with our business
21 ethics, and we didn't feel comfortable paying more
22 money to have an A-plus rating, because that's false.
23 And we would rather let our clients and our service
24 and our reputation serve best as far as how we perform
25 and how people are satisfied with our business. So as

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For

1 of last July, we discontinued our involvement with the
2 Better Business Bureau for that reason, among other --
3 other reasons. Then telling us that unless we pay a
4 higher fee amount, they're not going to give us a
5 better rating is, I guess, to my knowledge,
6 technically extortion.

7 MS. HOLTON: Aah.

8 SHANE: So we -- we chose -- we chose to
9 discontinue our service with them --

10 MS. HOLTON: Okay.

11 SHANE: -- for that reason. On good terms,
12 no hard feelings, just didn't agree with the way that
13 they did business, so...

14 MS. HOLTON: Okay. So, okay, now -- okay,
15 great. Thank you for that info. When -- I -- can you
16 still send me some info regarding your company by --

17 SHANE: Yeah.

18 MS. HOLTON: -- I can give you my email.

19 SHANE: Sure. I would be more than happy
20 to.

21 MS. HOLTON: Thank you.

22 SHANE: What's the best email for you?

23 MS. HOLTON: Is [REDACTED]
24 [REDACTED]@yahoo.com.

25 SHANE: Okay. Yeah, I can go ahead and send

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For

1 you some just basic information with some links to
2 TheCollegeInvestor.com, which is a online publication
3 that talks about student loan forgiveness and the
4 industry leaders and it talks a little bit about how,
5 you know, consolidating your student loans works and
6 how these programs work. I'll also send you a link in
7 there to -- we're accredited with the Association for
8 Student Loan Relief, which stands for -- the acronym
9 is AFSLR, and they are the leading association for
10 professionals associated with the sole purpose of
11 assisting Americans' burden with this type of -- this
12 type of debt. Okay?

13 MS. HOLTON: Okay, okay.

14 SHANE: So I'll include that link in there
15 and you can read up on them and all that kind of good
16 stuff, so --

17 MS. HOLTON: Okay, thank you.

18 SHANE: -- but please, you know, like I said
19 -- what's that? I'm sorry.

20 MS. HOLTON: Thank you so much. And thank
21 you for -- for your time, Shane.

22 SHANE: You're very, very welcome. Sure,
23 absolutely, not a problem at all.

24 MS. HOLTON: Great. Thank you. I'll be
25 looking forward to your email. For The Record, Inc.

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1 SHANE: All right. Sounds good, [REDACTED].

2 MS. HOLTON: Okay. You, too.

3 SHANE: Take care.

4 MS. HOLTON: You, too. Bye-bye.

5 SHANE: Bye-bye.

6 (The call was concluded.)

7 MS. HOLTON: This concludes the taping

8 session.

9 (The recording was concluded.)

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26 (800) 921-5555

1 CERTIFICATE OF TRANSCRIPTIONIST

2
3
4 I, Sara J. Vance, do hereby certify that the
5 foregoing proceedings and/or conversations were
6 transcribed by me via CD, videotape, audiotape or
7 digital recording, and reduced to typewriting under my
8 supervision; that I had no role in the recording of
9 this material; and that it has been transcribed to the
10 best of my ability given the quality and clarity of
11 the recording media.

12 I further certify that I am neither counsel
13 for, related to, nor employed by any of the parties to
14 the action in which these proceedings were
15 transcribed; and further, that I am not a relative or
16 employee of any attorney or counsel employed by the
17 parties hereto, nor financially or otherwise
18 interested in the outcome of the action.

19
20
21 DATE: 4/25/17

22 SARA J. VANCE, CERT

23
24
25 For The Record, Inc. (301) 870-8025 - www.ftrinc.net -
26 (800) 921-5555

Holton Attachment C

The screenshot shows a browser window displaying the Yahoo Mail interface. At the top, there is a navigation bar with links for Home, Mail, Search, News, Sports, Finance, Celebrity, Weather, Answers, Flickr, Mobile, and More. Below this is the Yahoo Mail logo and a search bar with the text "search your mailbox". To the right of the search bar are buttons for "Search Mail" and "Search Web".

The main content area shows an inbox with three emails:

From	Subject	Time
Shane Banning	Student Loan Relief Info	12:46 PM
Yahoo	Password change for your Yahoo account	12:14 PM
Yahoo	Sign in notification from Yahoo	12:13 PM

Below the inbox, a large message reads: "Hello, [redacted]. Let us help you get the most from your mailbox. You're already **25% done** setting it up." This is followed by four promotional cards:

- Create Account**: Create a fast, easy Yahoo Mail address with 1,000 GB of free storage. Button: [Create]
- Add all your email addresses**: Connect your Gmail, Outlook or AOL address to get all your email in one place. Button: [Connect]
- Enable notifications**: Receive alerts on your computer for new emails, even if you're not looking at Mail. Button: [Enable]
- Get Yahoo Mail for mobile**: Get the beautifully designed, lightning fast and easy-to-use app for iOS or Android. Button: [Install]

At the bottom of the setup section, there is a link that says "Finish setup later".

Holton Attachment C - 1

File Edit View Favorites Tools Help

Home Mail Search News Sports Finance Celebrity Weather Answers Flickr Mobile More

YAHOO! MAIL

search your mailbox Search Mail Search Web

Home

Compose Archive Move Delete Spam More

Add Gmail, Outlook, AOL and more

Inbox (2)

Drafts

Sent

Archive

Spam

Trash

Smart Views

Unread

Starred

People

Social

Shopping

Travel

Finance

Folders

Recent

Student Loan Relief Info

Shane Banning <shane.banning@ameritechfinancial.com> Today at 12:46 PM

To: [REDACTED]

This message contains blocked images. Show Images Change this setting

Hi [REDACTED]

Below are links and information regarding student loan repayment and forgiveness options. The following message will contain links verifying our credibility & hopefully give you piece of mind in knowing, you're dealing with *thee* industry leader in student loan assistance. The College Investor personally recommends our company as a trusted source of student loan forgiveness help.

<http://thecollegeinvestor.com/16429/is-your-student-loan-repayment-company-a-scam/>
<http://thecollegeinvestor.com/11616/consolidate-your-student-loans/>

We are accredited with the Association for Student Loan Relief (AFSLR) the leading association of professionals associated with the sole purpose of assisting Americans burdened with student loan debt.

<http://www.afslr.org>

I have been certified with the International Association of Professional Debt Arbitrators (IADPA) as a Certified Student Loan Specialist. As such, I professionally advise consumers on student loan debt relief.

<http://www.iapda.org/search.php>

What we do is simple, maximize your savings, prepare and file all the required documentation and keep you on track for loan forgiveness.

www.ameritechfinancial.com

I can be reached directly at [916-585-8393](tel:916-585-8393)

-- Very best

Shane Banning
 Ameritech Financial
 Direct Line: (916) 585-8393
 Email: shane.banning@ameritechfinancial.com

1101 Investment Blvd. Suite 290
 El Dorado Hills, CA 95762

Phone: [\(800\) 792-8621](tel:800-792-8621)
 Fax: [\(866\) 818-9026](tel:866-818-9026)
 Referral Program: refer.ameritechfinancial.com
 Customer Service: customer.service@ameritechfinancial.com
 Submit Documents: income.doc@ameritechfinancial.com
 Web: www.ameritechfinancial.com

Our Client Promise: 100% Client Satisfaction - 100% of The Time

NOTICE: The information contained in (and attached to) this e-mail is intended only for the personal and confidential use of the designated recipient(s) named above. If the reader of this message is not the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution or copying of this message is strictly prohibited. If you received this communication in error, please notify us immediately by reply e-mail, and delete the original message (including attachments). All participants in Ameritech

Holton Attachment C - 2

The screenshot shows a web browser window displaying the Yahoo! Mail interface. At the top, there is a navigation bar with links for Home, Mail, Search, News, Sports, Finance, Celebrity, Weather, Answers, Flickr, Mobile, and More. Below this is the Yahoo! Mail logo and a search bar with the text "search your mailbox". To the right of the search bar are buttons for "Search Mail" and "Search Web".

The main content area shows an email titled "Student Loan Relief Info" from "Shane Banning" at "Ameritech Financial". The sender's contact information is listed as: Direct Line: (916) 585-8393, Email: shane.banning@ameritechfinancial.com. The address is 1101 Investment Blvd. Suite 290, El Dorado Hills, CA 95762. Contact numbers are Phone: (800) 792-8621 and Fax: (866) 818-9026. Links are provided for the Referral Program, Customer Service, and Submit Documents.

The email includes a bolded section: "Our Client Promise: 100% Client Satisfaction - 100% of The Time". Below this is a notice: "NOTICE: The information contained in (and attached to) this e-mail is intended only for the personal and confidential use of the designated recipient(s) named above. If the reader of this message is not the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution or copying of this message is strictly prohibited. If you received this communication in error, please notify us immediately by reply e-mail, and delete the original message (including attachments). All participants in Ameritech Financial's referral program must agree to the Terms & Conditions of the program, reviewable at refer.ameritechfinancial.com."

At the bottom of the email, there are buttons for "Reply", "Reply to All", "Forward", and "More". Below the email content is a text input field and a "Send" button.

Attachment C - 3