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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 MARK DANT IN
SUPPORT OF FEDERAL TRADE
COMMISSION'S MOTION FOR
PRELIMINARY INJUNCTION**

DECLARATION OF MARK DANT

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1. My name is Mark Dant and I reside in California. The following statements are within my personal knowledge and if called as a witness I could and would competently testify thereto.

2. I started working for American Financial Benefit’s Center on or around February of 2015. Approximately two to three months later, Brandon and Tyler terminated me for not enrolling enough clients and insubordination.

3. In the short time that I was at the company, I worked in the sales department where I took calls from people that were struggling with their student loans and wanted to reduce their payments.

4. Prior to starting, my training lasted approximately one week. The first red flag was the quality of the training and the fact that it took place between two sets of doors at the entrance of an office building. We were never taught specifics about the student loan process and were simply told to follow the script.

5. When people called, I would qualify them for our program based off income, occupation, and family size. Since occupation and income are hard to falsify due to the IRS, we were told to focus on exaggerating the family size to help people qualify for our program.

6. I recall Cameron, a manager, telling us off script that we had to embellish family size and that anyone the potential client gave gifts to could be considered a family member. The idea behind this was that if you told the government you had many dependents, there was a higher likelihood that your student loan payments would be reduced. The highest family size I saw get approved was certainly in the double digits, somewhere between 12-15 family members.

7. The fees we collected were a document preparation fee and a monthly service fee. I don’t recall how much the document preparation fee was but I do know the monthly fee ranged from approximately \$49-\$99 a month. This fee would be paid indefinitely until a client’s loan was paid off.

