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11
12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **OAKLAND DIVISION**

15 FEDERAL TRADE COMMISSION,

16 Plaintiff,

17 vs.

18 AMERICAN FINANCIAL BENEFITS
19 CENTER, a corporation, also d/b/a AFB and AF
20 STUDENT SERVICES;

21 AMERITECH FINANCIAL, a corporation;

22 FINANCIAL EDUCATION BENEFITS
23 CENTER, a corporation; and

24 BRANDON DEMOND FRERE, individually
25 and as an officer of AMERICAN FINANCIAL
26 BENEFITS CENTER, AMERITECH
27 FINANCIAL, and FINANCIAL EDUCATION
28 BENEFITS CENTER,

Defendants.

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

Related Case: 4:17-cv-04817-SBA

**DECLARATION OF GEORGIA
MARTIN IN SUPPORT OF FEDERAL
TRADE COMMISSION'S MOTION
FOR PRELIMINARY INJUNCTION**

DECLARATION OF GEORGIA MARTIN

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

6 2. I worked at Ameritech Financial in February and March 2017 in the El Dorado
7 Hills call center.

8 3. Originally, the employment advertisement on Indeed quoted an \$80k pay scale.
9 After I arrived, I found out it was a \$12.00 per hour job with a \$10.00 bonus for every person
10 that I signed into the program.

11 4. The company had a "program" to assist people who had student loan debt. The
12 script that was developed and used was quite lengthy and took about an hour to get through. I
13 feel it was intended to make it so that people were paying less attention by the end of the call.

14 5. The benefits that were included in the monthly fee were of little or no value to the
15 general public, but were an offset for the \$99 minimum payment. We were encouraged to hide
16 in the jargon, the fact that none of the payment was actually going to the loan servicer.

17 6. The company had a strict policy that telephone agents needed to "sign up" as
18 many people as possible and threatened termination if that was not met.

19 7. I left the company after a few weeks when I questioned the ethics of certain
20 practices and was told that I will do whatever my supervisor fucking said to do or else. I resigned
21 that day.

22 8. I later took a job with a different company and have a desk in the El Dorado court
23 building. I saw one of the employees in the court and he told me that the company was doing so
24 good that they have opened an office in the Dominican Republic and one other country, I believe
25 either Mexico or Costa Rica.

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27 9. I declare under penalty of perjury that the foregoing is true and correct. Executed
28 on April 11, 2018, in California.

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Georgia Martin