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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 WILLIAM
ZAORSKI IN SUPPORT OF
FEDERAL TRADE COMMISSION'S
MOTION FOR PRELIMINARY
INJUNCTION**

DECLARATION OF WILLIAM ZACHARY ZAORSKI

1. My name is William Zachary Zaorski 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 AmeriTech Financial in early 2016 and was employed there for approximately three months.

3. I was hired as a sales associate/document preparer and my direct manager was Mike Console. The initial week-long training was given by Tyler Colt and consisted of role playing different scenarios and reading the sales script.

4. The job consisted of taking inbound calls from students seeking loan forgiveness. As I understand it, these calls came from people that got AmeriTech's mailer that it would send out advertising loan forgiveness. I was required to follow the provided script.

5. The main service AmeriTech sold was document preparation. The service costs started at about \$1,000 and went up from there. The document preparation was for AmeriTech to help students file for the various programs offered through the Department of Education. AmeriTech's clients had the option of paying this in full or over the course of a number of months.

6. I now recognize that one of the strategies the company used was to induce people enrolling in this program to overstate their family size. I was trained that the definition of "family size" in the Department of Education's statutes was "vague" and "broad." For example, my managers trained me, and the script they gave me stated, that persons to whom one gave clothes during the winter could be claimed as potential family members. In my experience, family sizes of 7 were common results in the intake process. The highest reported family size that I saw was 11.

7. As part of the program, there was also some side website that was offered. It had access to things like LifeLock and identity theft protection. I don't know much about this service and did not interact with it.

8. Shortly before I left the company, I realized that almost all of the inbound callers with whom I dealt believed that the money they paid us was going towards their student loans. We were

never told whether any of the money went to loan payments. Nor did the script clearly state to clients whether any of their money went to loan payments.

9. I occasionally heard complaints, most of which were from clients who were confused over where their monthly payments were going.

10. I left the company voluntarily, partly because I didn't feel like the service it was offering provided any value to clients.

11. My overall impression after leaving was that this operation was a scam because the company offered very little value to its clients. This was a very expensive program for something that people could do themselves through the Department of Education. In addition, I now understand that the company misled me, and its script misled clients about the definition of "family size."

12. I declare under penalty of perjury that the foregoing is true and correct. Executed on

March 31st, 2018, in California.

W. Zachary Zaorski

William Zachary Zaorski