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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **OAKLAND DIVISION**

11 **FEDERAL TRADE COMMISSION,**

12 **Plaintiff,**

13 **vs.**

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

17 **AMERITECH FINANCIAL, a corporation;**

18 **FINANCIAL EDUCATION BENEFITS**
19 **CENTER, a corporation; and**

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

25 **Defendants.**

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

DECLARATION OF ERICA BUFANO
IN SUPPORT OF FEDERAL TRADE
COMMISSION'S MOTION FOR
PRELIMINARY INJUNCTION

DECLARATION OF ERICA BUFANO

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

5 2. From approximately March 2015 to March 2016, I worked in the Sales and
6 Operations Departments of American Financial Benefits Center (“AFBC”) and AmeriTech
7 Financial (collectively “the company”). The descriptions of the company’s policies and
8 procedures in this declaration are based on my personal experience and things I observed while
9 working at the company. I left the company because its practices were completely wrong.

10 3. In early 2015, AFBC’s owners, Brandon Frere and Cameron Henry, interviewed
11 me for a sale position. Mr. Frere did not believe that I had a six-figure income at a prior job and
12 demanded that I provide him with my W-2 employment record to prove my salary. Even though
13 I felt uncomfortable, I gave Mr. Frere my W-2 and he hired me.

14 4. I worked in the company’s Rohnert Park office. Mr. Frere had an office in the
15 company’s headquarters and managers would frequently come to him with questions.

16 5. AFBC sent flyers and postcards to consumers promising to reduce their student
17 loan payment or get their student loan forgiven. Consumers I spoke with who called AFBC told
18 me that the company’s name was not on the mailers. AFBC managers never showed me the
19 mailers, but I found them on google.

20 6. My first position at AFBC was answering calls from consumers inquiring about
21 student loan assistance. Mr. Henry and Tyler Colt gave me a sales script to follow and trained
22 me on how to sell the company’s services. They also coached me on how to convince clients to
23 inflate their family size on their student loan payment reduction applications. Mr. Henry and Mr.
24 Colt instructed me to tell clients that nearly anyone could count as a family member on a student
25 loan payment reduction application, including people they gave Christmas presents to. AFBC’s
26 owners and managers knew the company was submitting student loan payment reduction
27 applications to lenders that contained false information.
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