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

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

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

AMERITECH FINANCIAL, a corporation;

FINANCIAL EDUCATION BENEFITS
CENTER, a corporation; and

BRANDON DEMOND FRERE, individually
and as an officer of AMERICAN FINANCIAL
BENEFITS CENTER, AMERITECH
FINANCIAL, and FINANCIAL EDUCATION
BENEFITS CENTER,

Defendants.

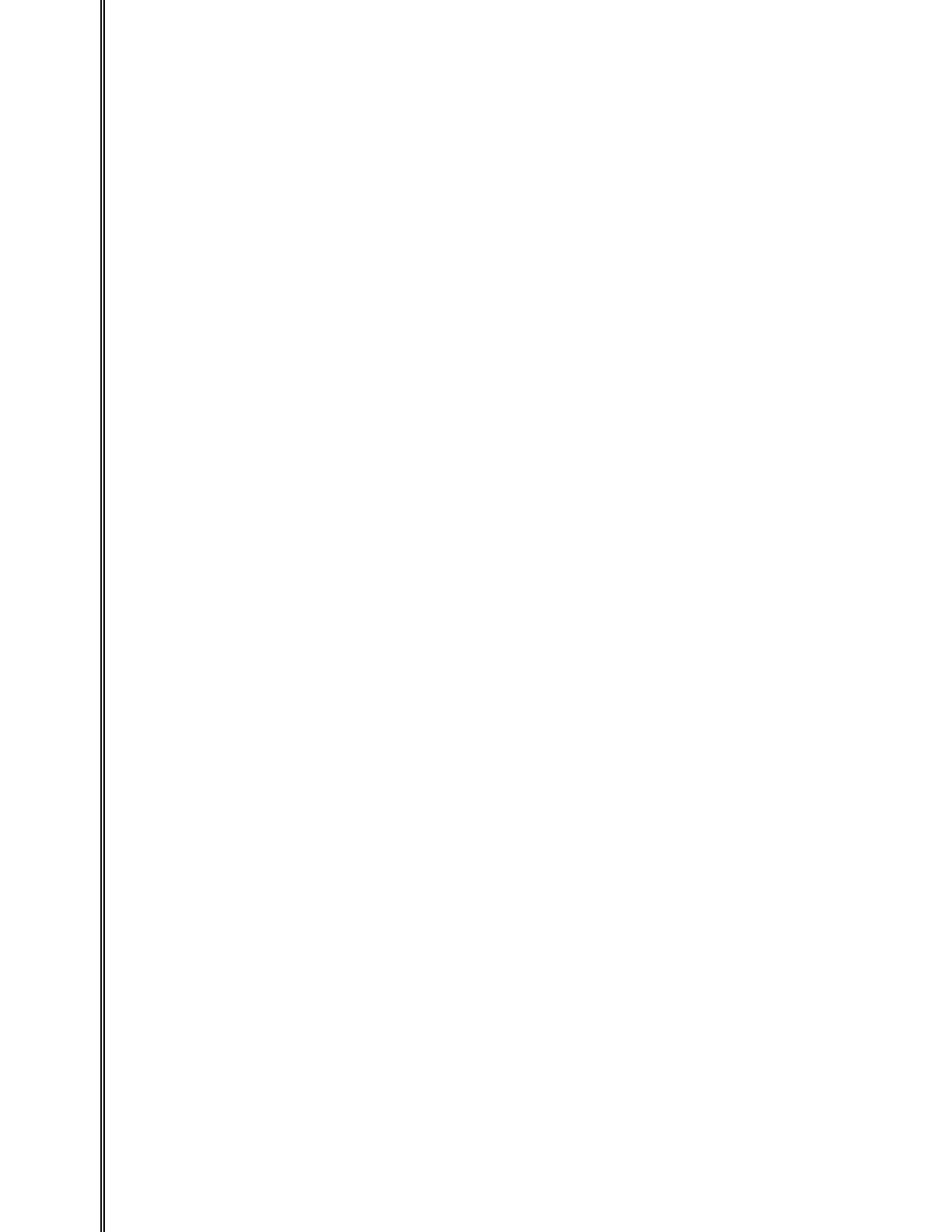
Case No. 4:18-cv-00806-SBA

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

**DECLARATION OF DANIELLE
KINNEY IN SUPPORT OF FEDERAL
TRADE COMMISSION'S MOTION
FOR PRELIMINARY INJUNCTION**

**DECLARATION OF DANIELLE KINNEY IN SUPPORT OF FEDERAL TRADE
COMMISSION'S MOTION FOR PRELIMINARY INJUNCTION
4:18-CV-00806-SBA**

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1 termination paperwork or he would sign it for me. I considered filing a whistleblower or
2 retaliation claim with the Labor Board, but did not have the resources to pursue the case.

3 14. I am in contact with someone who still works at Ameritech. In February 2018,
4 this person told me that a supervisor at Ameritech had a meeting with Ameritech staff and told
5 them that the company was going to change its name, but continue operations as usual, similar to
6 when it changed from American Financial Benefits Center to Ameritech Financial. I was angry
7 when I heard about the company's attitude. On March 1, 2018, I sent the following email to the
8 FTC:

9 Hello,

10 My name is Danielle Kinney and I just recently received a letter about Ameritech
11 Financial who is my previous employer. I was fired in May of 2017 because I would not
12 participate in a project Brandon was working on. This project consisted of collecting
13 money from customers even if no work was done on the file. I did not agree with the
14 project therefore refused to participate. I was fired a week later and forced to sign papers
15 by HR manager Steve Sims. Before I was fired, I documented each customer who I was
16 asked to call every day for over 90 days. These customers had no work done for them,
17 therefore they should of received a full refund. But we were instructed to collect the
18 money even if no work had been done. I believe that I have some vital information that
19 could help in this case and bring some justice to the customers. Please let me know of a
20 time we could speak about this case. Thank you.

21 I hope to hear from you soon.

22 Danielle Kinney

23 15. I declare under penalty of perjury that the foregoing is true and correct. Executed
24 on April 16, 2018, in California.

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27 _____
Danielle Kinney