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11
12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **OAKLAND DIVISION**
15

16 FEDERAL TRADE COMMISSION,

17 Plaintiff,

18 vs.

19 AMERICAN FINANCIAL BENEFITS

20 CENTER, a corporation, also d/2 (9 Tc 0 Tw 17t 3.34 r03 T5D)-1 (1T6 a)-1 (nd C /Pv93t)3 (o)JTJT

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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 I called as a witness to certify the truth of the
5 statements herein.

6 2. I worked at Ameritech Financial in February and March 2011 in the El Dorado
7 Hills call center.

8 3. Originally, the employment advertisement on Indeed stated an \$80k pay scale.
9 After I arrived, I found a \$10.00 bonus for every person I referred to the company
10 that I signed into the program.

11 4. The company had a "pre-qualified" script that was developed and used was quite lengthy and to
12 feel it was intended to make it so that people were paying less attention by the end of the call.

13 5. The benefits that were in the advertisement were not disclosed to the
14 general public, but were an offset for the \$99 minimum payment. We were encouraged to hide
15 in the jargon, the fact that none of the payments was actually going to the loan servicer
16 and to refer as many people as possible to the company.

17 6. I followed the company's business plan and was told that the company was going to stay
18 that way.

19 8. I later took a job with a different company and have a desk in the El Dorado
20 building. I saw one of the employees who was in the country I believe
21 good that they were in the country. I believe that the company was in
22 Mexico or Costa Rica.

23 9. I declare under penalty of perjury that the foregoing is true and correct. I executed this
24 declaration on April 11, 2011 in California.

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