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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

IMPETUS ENTERPRISE, INC., a  
California corporation, also d/b/a  
Aiding Student Relief, Aiding Students  
& Teachers, Aidnest, AVEC Staffing,  
and National Education Student and  
Teacher; FIG TREE & CO., LLC, a  
California limited liability company,  
also d/b/a Aiding Student Relief, Aiding  
Students & Teacher, and Aiding

Case No. \_\_\_\_\_

**COMPLAINT FOR  
PERMANENT INJUNCTION  
AND OTHER EQUITABLE  
RELIEF**

**[Lodged Under Seal]**

1 Students & Teachers; TUAN DINH  
2 DUONG, a/k/a Thomas Duong, a/k/a  
3 Thomas Dinh, individually and as an  
4 officer of IMPETUS ENTERPRISE,  
5 INC.; BRENDA AVITIA-PENA,  
6 individually and as an officer of  
7 IMPETUS ENTEPRISE, INC. and  
8 FIG TREE & CO., LLC; and BRIAN  
9 COLOMBANA d/b/a FUTERO,  
10 individually and as an officer of FIG  
11 TREE & CO., LLC,

12 Defendants, and

13 NOEL SOLUTIONS, LLC, a Wyoming  
14 limited liability company,

15 Relief Defendant.

16 Plaintiff, the Federal Trade Commission (“FTC”), for its Complaint alleges:

17 1. The FTC brings this action under Section 13(b) of the Federal Trade  
18 Commission Act (“FTC Act”), 15 U.S.C. § 53(b), and the Telemarketing and  
19 Consumer Fraud and Abuse Prevention Act (“Telemarketing Act”), 15 U.S.C. §§  
20 6101-6108, to obtain temporary, preliminary, and permanent injunctive relief,  
21 rescission or reformation of contracts, restitution, the refund of monies paid,  
22 disgorgement of ill-gotten monies, and other equitable relief for Defendants’ acts  
23 or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and the  
24 FTC’s Telemarketing Sales Rule (“TSR”), 16 C.F.R. Part 310, in connection with  
25 their deceptive marketing and sale of student loan debt relief services.

### 26 **JURISDICTION AND VENUE**

27 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§  
28 1331, 1337(a), and 1345, and 15 U.S.C. §§ 45(a), 53(b), 6102(c), and 6105(b).



1           7. Defendant Fig Tree & Co., LLC (“Fig Tree LLC”), also doing  
2 business as Aiding Student Relief, Aiding Students & Teacher, and Aiding  
3 Students & Teachers, is a California limited liability company with its principal  
4 place of business at 18100 Von Karman Ave., Suite 850, Irvine, California 92612.  
5 Fig Tree LLC transacts or has transacted business in this district and throughout  
6 the United States. At all times material to this Complaint, acting alone or in  
7 concert with others, or as part of the common enterprise described in paragraph 12,  
8 Fig Tree LLC has advertised, marketed, offered to provide, provided, offered for  
9 sale, or sold student loan debt relief services to consumers throughout the United  
10 States.

11           8. Defendant Tuan Dinh Duong, also known as Thomas Duong and  
12 Thomas Dinh (“Duong”), has identified himself as or served as the President,  
13 director, general manager, sales manager, owner, co-owner, and principal  
14 shareholder of Impetus. At all times material to this Complaint, acting alone or in  
15 concert with others, he has formulated, directed, controlled, had the authority to  
16 control, or participated in the acts and practices set forth in this Complaint.  
17 Defendant Duong resides in this district and, in connection with the matters alleged  
18 herein, transacts or has transacted business in this district and throughout the  
19 United States.

20           9. Defendant Brenda Avitia-Pena (“Avitia-Pena”) has identified herself  
21 as or served as the President, CEO, Secretary, CFO, director, and owner of  
22 Impetus, and the manager of Fig Tree LLC. At all times material to this  
23 Complaint, acting alone or in concert with others, she has formulated, directed,  
24 controlled, had the authority to control, or participated in the acts and practices set  
25 forth in this Complaint. Defendant Avitia-Pena resides in this district and, in  
26 connection with the matters alleged herein, transacts or has transacted business in  
27 this district and throughout the United States.  
28



1 directed, controlled, had the authority to control, or participated in the acts and  
2 practices of the Corporate Defendants that constitute the common enterprise.

### 3 COMMERCE

4 13. At all times material to this Complaint, Defendants have maintained a  
5 substantial course of trade in or affecting commerce, as “commerce” is defined in  
6 Section 4 of the FTC Act, 15 U.S.C. § 44.

### 7 DEFENDANTS’ UNLAWFUL STUDENT LOAN DEBT RELIEF

#### 8 OPERATION

9 14. Since at least December 2014, Defendants have operated an unlawful  
10 debt relief scheme that preys on consumers with student loan debt. In telephone  
11 calls and on websites, Defendants promise to reduce consumers’ monthly student  
12 loan payments and eliminate all, or a portion of, their student loan debt through  
13 enrollment in student loan forgiveness or repayment programs. In many instances,  
14 however, Defendants failed to obtain debt forgiveness or monthly payment  
15 reductions. In fact, some consumers owed more on their student loans after  
16 enrolling in Defendants’ program.

17 15. In exchange for the promised student loan debt relief services,  
18 Defendants have charged illegal upfront fees of \$499 or more.

#### 19 **Background on Student Loan Forgiveness and Repayment Programs**

20 16. Student loan debt is the second largest class of consumer debt; more  
21 than 42 million Americans collectively owe nearly \$1.5 trillion in student loan  
22 debt. The student loan market shows elevated levels of distress relative to other  
23 types of consumer debt.

24 17. To address this mounting level of distressed debt, the U.S.  
25 Department of Education (“USDE”) and state government agencies administer a  
26 limited number of student loan forgiveness and discharge programs. Most  
27 consumers, however, do not qualify for these programs because of strict eligibility  
28

1 requirements. For example, one program requires the consumer to demonstrate a  
2 total and permanent disability; another applies only to consumers whose school  
3 closed while the consumer was still enrolled. A third program, the Borrower  
4 Defense to Repayment (“BDR”), may provide a loan discharge if the school,  
5 through an act or omission, violated state law directly related to the borrower’s  
6 federal student loan or to the educational services for which the loan was provided.

7 18. Other forgiveness programs require borrowers to work in certain  
8 professions for a period of years. For example, Teacher Loan Forgiveness applies  
9 to teachers who have worked full-time for five years in a low-income elementary  
10 or secondary school or educational service agency. Public Service Loan  
11 Forgiveness (“PSLF”) applies to employees of governmental units or non-profit  
12 organizations who make timely monthly payments for a period of ten years while  
13 employed in the public sector.

14 19. The federal government also offers loan forgiveness through income-  
15 driven repayment (“IDR”) programs that enable borrowers to reduce their monthly  
16 payments and have portions of their loans forgiven. IDR programs allow eligible  
17 borrowers to limit their monthly payments based on a percentage of their  
18 discretionary monthly income. To remain in an IDR program, borrowers must  
19 recertify their income and family size annually. Obtaining forgiveness through  
20 IDR programs requires a minimum of 20 or 25 years of qualifying payments,  
21 depending on whether borrowers received their first loans on July 1, 2014 or  
22 before that date. Because a borrower’s income is likely to fluctuate over the life of  
23 the loan, monthly payments under the IDR programs can vary considerably from  
24 year to year. If a borrower’s income were to increase over the repayment period,  
25 for example, the monthly payment amount could correspondingly increase to the  
26 point where those payments would pay off the loan before any amount could be  
27 forgiven at the end of the repayment term. No loans have been forgiven yet under  
28

1 any of the IDR programs because the programs have not existed long enough for  
2 borrowers to make the minimum number of years of qualifying payments.

3 20. Consumers can apply for BDR, PSLF, IDR, and other loan repayment  
4 and forgiveness or discharge programs through USDE or their student loan  
5 servicers at no cost; these programs do not require the assistance of a third-party  
6 company or payment of application fees.

7 21. USDE will grant forbearance while processing applications for an  
8 alternative repayment plan, and in some cases of hardship. During forbearance,  
9 unpaid interest is added to the principal balance.

10 **Defendants’ Deceptive Marketing of Student Loan Debt Relief Services**

11 22. To lure consumers into purchasing their purported student loan debt  
12 relief services, Defendants have made false promises to eliminate or reduce  
13 consumers’ student loan balances or monthly payments through loan forgiveness  
14 or other programs.

15 23. To induce consumers to purchase their purported student loan debt  
16 relief services, Defendants have disseminated websites such as [aidingstudents.com](http://aidingstudents.com)  
17 and [aidnest.com](http://aidnest.com), including, but not necessarily limited to, the attached exhibits A  
18 through E. Defendants’ websites have contained the following statements, among  
19 others:

<b>Free Assessment</b>	<b>Service Guarantee</b>	<b>Success Rate</b>
Our experts will assess your current student loan program, and determine which programs are available in your situation. We will help you decide which program can help you	We are committed to helping customers get lower rates and monthly payments, and we will make the process seamless and straightforward. You will be satisfied with our	Our 96% success rate is one of the top ratings in the industry. Our process has been tested, and our success rate proves that it works. We can help you reduce and simplify your payments. Call us today!



1 achieve your goals. Call service and our  
2 us today! commitment to your  
3 success. That's our  
4 guarantee.

5 Ex. A at 1 ([aidingstudents.com](http://aidingstudents.com), 2015).

6  
7 **“We can help you reduce and simplify your payments. Contact one of  
8 our specialists today for a free evaluation.”**

9 Ex. A at 2 (emphasis in original).

10  
11 “Aiding Student Relief has helped countless people reduce their student  
12 debt. Their proven business plan has led to one of the highest success rates in the  
13 industry.”

14 Ex. A at 4.

15 **100% Customer Satisfaction**

16 We can help you reduce and simplify your payments. Call one of our specialists  
17 today.

18 Ex. B at 1 ([aidingstudents.com](http://aidingstudents.com), 2016) (emphasis in original).

19 **Meet some of our members who have saved big on their student loan debt.  
20 Helping You Save Big**

21 -----  
22 “Thanks to Aiding Student Relief, I am savings [sic] \$250 per month.”

23 Michael Martin

24 Entrepreneur

25 Ex. B at 2 (emphasis in original).

26 **“We can help you reduce and simplify your payments . . . .”**

27 Ex. C at 1 ([aidingstudents.com](http://aidingstudents.com), 2018) (emphasis in original).

1 **Student Loan**  
2 **Forgiveness**

**Loan Forgiveness**

**Student Loan**  
**Forgiveness**

3 If you have Federal  
4 Student Loans, you're in  
5 the right place to get those  
6 loans reduced, forgiven or  
7 completely discharged  
8 through our student loan  
9 forgiveness programs.

Get your multiple Federal  
Student Loans  
consolidated into one,  
forget about increasing  
interests [sic] and pay  
month to month at the  
lowest possible cost.

We understand if you're  
going through some  
hardship, and that's why  
with us you'll be able to  
make monthly payments  
based on your  
affordability, for as low as  
\$0.00, depending on your  
situation.

10 Ex. D at 2 ([aidnest.com](http://aidnest.com), 2016).

11  
12 **Lower your loan payments**  
13 **by getting in touch with**  
14 **one of our professionals**

15 We design a customized repayment plan that will allow you to make  
16 payments based on your monthly income, family size, and spending.  
17 Get rid of the hassle of extensive paperwork and get the help you  
18 deserve.

19 What we can help you achieve [is] a lower payment or lower rate.

20 Ex. E at 6 ([aidnest.com](http://aidnest.com), 2018) (emphasis in original).

21 24. In some instances, consumers view the Defendants' online advertising  
22 and call Defendants' telemarketers for more information. Defendants also make  
23 outbound telemarketing calls and send texts to consumers to offer their services  
24 and convince student loan borrowers to sign up for Defendants' debt relief  
25 services.

26 25. In calls with consumers, Defendants' telemarketers have told  
27 consumers that Defendants can cause consumers' student loan balances to be  
28 reduced, or that consumers' loan balances would be forgiven after making lower

1 monthly payments. Defendants’ telemarketers have told some consumers that over  
2 half their loan balance would be forgiven. Moreover, Defendants’ telemarketers  
3 have told some consumers that their loan payments could or would be rapidly  
4 reduced to \$19 per month, or promptly forgiven.

5         26. Defendants have made other representations concerning loan  
6 reduction or forgiveness to consumers in telemarketing their debt relief services.  
7 For example, Defendants’ telemarketers have told one or more consumers that  
8 “family size,” a metric for determining the amount borrowers pay each month  
9 under IDR plans, includes “anyone you help out throughout the year[,] they don’t  
10 have to live with you,” even claiming that helping with “gas money, three times  
11 out of the year” is enough to include a person in “family size.” Further,  
12 Defendants’ telemarketers have offered one or more consumers “basically a  
13 guarantee to remain” in an IDR plan, and warned one or more consumers that  
14 signing up for an IDR plan with a lender instead would result in a higher loan  
15 payment.

16         27. Defendants have not been likely to achieve the lower monthly  
17 payments or student loan forgiveness they have advertised, marketed, and  
18 promoted to consumers. In many instances, Defendants have failed to obtain the  
19 promised lower monthly payments or student loan forgiveness.

20         28. Defendants have charged consumers fees for purported debt relief  
21 services before achieving lower monthly payments or student loan forgiveness,  
22 and, in many instances, have failed to achieve those results at all on behalf of  
23 consumers.

24         29. Defendants’ telemarketers have sought and obtained consumers’  
25 payment information by phone or the Internet.



1 extensively amended it in 2003, and amended certain sections thereafter. 16  
2 C.F.R. Part 310.

3 37. Defendants are “seller[s]” or “telemarketer[s]” engaged in  
4 “telemarketing” as defined by the TSR, 16 C.F.R. § 310.2(dd), (ff), and (gg). A  
5 “seller” means any person who, in connection with a telemarketing transaction,  
6 provides, offers to provide, or arranges for others to provide goods or services to a  
7 customer in exchange for consideration. 16 C.F.R. § 310.2(dd). A “telemarketer”  
8 means any person who, in connection with telemarketing, initiates or receives  
9 telephone calls to or from a customer or donor. 16 C.F.R. § 310.2(ff).  
10 “Telemarketing” means a plan, program, or campaign which is conducted to  
11 induce the purchase of goods or services or a charitable contribution, by use of one  
12 or more telephones and which involves more than one interstate telephone call. 16  
13 C.F.R. § 310.2(gg).

14 38. Defendants are sellers or telemarketers of “debt relief services” as  
15 defined by the TSR, 16 C.F.R. § 310.2(o). Under the TSR, a “debt relief service”  
16 means any program or service represented, directly or by implication, to  
17 renegotiate, settle, or in any way alter the terms of payment or other terms of the  
18 debt between a person and one or more unsecured creditors or debt collectors,  
19 including, but not limited to, a reduction in the balance, interest rate, or fees owed  
20 by a person to an unsecured creditor or debt collector. 16 C.F.R. § 310.2(o).

21 39. The TSR prohibits sellers and telemarketers from requesting or  
22 receiving payment of any fees or consideration for any debt relief service until and  
23 unless:

- 24 a. The seller or telemarketer has renegotiated, settled, reduced, or  
25 otherwise altered the terms of at least one debt pursuant to a  
26 settlement agreement, debt management plan, or other such  
27 valid contractual agreement executed by the customer; and  
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- 1           b.     The customer has made at least one payment pursuant to that  
2                 settlement agreement, debt management plan, or other valid  
3                 contractual agreement between the customer and the creditor;  
4                 and  
5           c.     To the extent that debts enrolled in a service are renegotiated,  
6                 settled, reduced, or otherwise altered individually, the fee or  
7                 consideration either:  
8                 i.     Bears the same proportional relationship to the total fee  
9                         for renegotiating, settling, reducing, or altering the terms  
10                        of the entire debt balance as the individual debt amount  
11                        bears to the entire debt amount. The individual debt  
12                        amount and the entire debt amount are those owed at the  
13                        time the debt was enrolled in the service; or  
14                 ii.    Is a percentage of the amount saved as a result of the  
15                         renegotiation, settlement, reduction, or alteration. The  
16                         percentage charged cannot change from one individual  
17                         debt to another. The amount saved is the difference  
18                         between the amount owed at the time the debt was  
19                         enrolled in the service and the amount actually paid to  
20                         satisfy the debt. 16 C.F.R. § 310.4(a)(5)(i).

21           40.    The TSR prohibits sellers and telemarketers from misrepresenting  
22                 directly or by implication, any material aspect of any debt relief service, including,  
23                 but not limited to, the amount of money or the percentage of the debt amount that a  
24                 customer may save by using the service. 16 C.F.R. § 310.3(a)(2)(x).

25           41.    Pursuant to Section 3(c) of the Telemarketing Act, 15 U.S.C  
26                 § 6102(c), and Section 18(d)(3) of the FTC Act, 15 U.S.C. § 57a(d)(3), a violation  
27  
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1 of the TSR constitutes an unfair or deceptive act or practice in or affecting  
2 commerce, in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

3 **VIOLATIONS OF THE TELEMARKETING SALES RULE**

4 **Count Two**

5 **(Advance Fee for Debt Relief Services)**

6 42. In numerous instances, in connection with the telemarketing of  
7 student loan debt relief services, Defendants have requested or received payment  
8 of a fee or consideration for debt relief services before:

9 a. Defendants have renegotiated, settled, reduced, or otherwise  
10 altered the terms of at least one debt pursuant to a settlement  
11 agreement, debt management plan, or other such valid contractual  
12 agreement executed by the customer; and

13 b. The customer has made at least one payment pursuant to that  
14 settlement agreement, debt management plan, or other valid  
15 contractual agreement between the customer and the creditor.

16 43. Defendants' acts or practices, as described in Paragraph 40 of this  
17 Complaint, are abusive telemarketing acts or practices that violate Section  
18 310.4(a)(5)(i) of the TSR, 16 C.F.R. § 310.4(a)(5)(i).

19 **Count Three**

20 **(Material Debt Relief Misrepresentations)**

21 44. In numerous instances, in connection with the telemarketing of  
22 student loan debt relief services, Defendants have misrepresented, directly or  
23 indirectly, expressly or by implication, material aspects of their debt relief services,  
24 including, but not limited to that consumers who purchase Defendants' debt relief  
25 services will or likely will have their monthly payments reduced or their loan  
26 balances forgiven in whole or in part.





1 the disgorgement of ill-gotten monies, to prevent and remedy any violation of any  
2 provision of law enforced by the FTC.

3 51. Section 6(b) of the Telemarketing Act, 15 U.S.C. § 6105(b),  
4 authorizes this Court to grant such relief as the Court finds necessary to redress  
5 injury to consumers resulting from Defendants' violations of the TSR, including  
6 the rescission or reformation of contracts, and the refund of money.

7 **PRAYER FOR RELIEF**

8 Wherefore, Plaintiff FTC, pursuant to Section 13(b) of the FTC Act, 15  
9 U.S.C. § 53(b), Section 6(b) of the Telemarketing Act, 15 U.S.C. § 6105(b), and  
10 the Court's own equitable powers, requests that the Court:

- 11 A. Award Plaintiff such preliminary injunctive and ancillary relief as  
12 may be necessary to avert the likelihood of consumer injury during  
13 the pendency of this action and to preserve the possibility of effective  
14 final relief, including but not limited to, temporary and preliminary  
15 injunctions, orders freezing assets, immediate access to business  
16 premises, appointment of a receiver, and expedited discovery;
- 17 B. Enter a permanent injunction to prevent future violations of the FTC  
18 Act and the TSR;
- 19 C. Award such relief as the Court finds necessary to redress injury to  
20 consumers resulting from Defendants' violations of the FTC Act and  
21 the TSR, including but not limited to, rescission or reformation of  
22 contracts, restitution, the refund of monies paid, and the disgorgement  
23 of ill-gotten monies;
- 24 D. Enter an order requiring Relief Defendant to disgorge all funds and  
25 assets, or the value of the benefit it received from the funds and assets,  
26 which are traceable to funds obtained from Defendants' customers  
27 through the unlawful acts or practices described herein; and  
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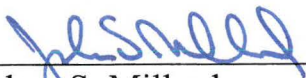
E. Award Plaintiff the costs of bringing this action, as well as such other and additional relief as the Court may determine to be just and proper.

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Dated: November 6, 2018

Respectfully submitted,

ALDEN F. ABBOTT  
General Counsel



Joshua S. Millard  
Brian M. Welke  
Barbara Chun  
Attorneys for Plaintiff  
FEDERAL TRADE COMMISSION

# EXHIBIT A

**STUDENT LOAN CRISIS AND WHAT YOU CAN DO**  
**(855) 510-5400**

**WHAT'S CAUSING ALL THIS?**

- **CREDENTIAL INFLATION**
- **EASY ACCESS TO LOANS**
- **DECREASING VALUE OF \$USD**



**APPLY NOW**

More Info



**Free Assessment**

Our experts will assess your current student loan program, and determine which programs are available in your situation. We will help you decide which program can help you achieve your goals.  
Call us today!



**Service Guarantee**

We are committed to helping customers get lower rates and monthly payments, and we will make the process seamless and straightforward. You will be satisfied with our service and our commitment to your success. That's our guarantee.



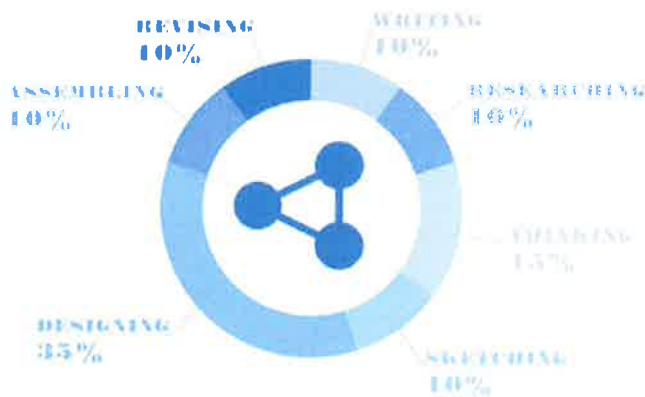
**Success Rate**

Our 96% success rate is one of the top ratings in the industry. Our process has been tested, and our success rate proves that it works. We can help you reduce and simplify your payments.  
Call us today!

# ABOUT US

We Strive For Success

**We can help you reduce and simplify your payments. Contact one of our specialists today for a free evaluation.**



## What Makes Us Great!

Aiding Student Relief has a staff of trained experts on standby to help you. These friendly faces have trained extensively, and are familiar with the nuances of government and private student loans. They will use this expertise to look out for your best interests. Our success rate is the result of our staff, and our strategy.

Our student loan advisors follow a proven strategy to reduce and simplify your student loan payments: **1) Assembling:** We gather

information and documents to assess your individual situation.

**2) Researching:** Our staff will double-check all information before developing a game plan. **3) Thinking:** After our research is complete, we investigate all possible assistance options. **4) Writing:** We provide a written strategy before we take action, because you deserve to understand the process. **5) Revising:** Aiding Student Relief is committed to creative, out-of-the-box thinking. We will leave no stone unturned, because we have your best interest at heart. **6) Sketching:** Our notes and records are thorough, and provide a clear portrait of your situation, so any of our experts are equipped to assist you with your case. **7) Designing:** Life isn't one-size fits all. We will design a strategy to fit your unique situation, so you can have your own perfect success story.

Why choose Aiding Student Relief? Our advisors are qualified to assist with more types of assistance than our competitors. In addition to the plans most companies can help with, we are equipped to work with private student loans, and can even intervene in the case of wage garnishment. Aiding Student Relief has more to offer, and we offer it with flexible rates and a money back guarantee.

We Have Been Featured In

WALL STREET  
JOURNAL

CNN

Forbes

MARKEAZY

SHARK  
TANK

**FTC-AID-2**

# SERVICES

What We Do Best



## Loan Forgiveness

In some cases, individuals with Federal Student Loans may qualify to have a portion of the amount owed may be forgiven. This means your principal balance could be significantly reduced, and you will not be expected to repay the forgiven amount.



## Income Based Payments

A period of financial hardship may qualify you for an Income Based Repayment Plan. In many cases, this means you pay nothing. Unlike a deferment, the term on your loan continues to reduce while the plan is in place. Your term could reduce while you pay nothing.



## Loan Consolidation

You may be able to combine multiple federal student loans into one new loan with a lower, more affordable monthly payment. Loan consolidation programs can help you qualify for additional programs, like loan forgiveness programs or Public Service Loan Forgiveness.



## Private Sector Loan Forgiveness

If you work for a government organization at a city, state, or federal level, you may qualify for the Public Service Loan Forgiveness program. To qualify, your loans must be consolidated into a specific repayment plan. The balance on your federal student loans is forgiven after 120 qualifying



## Permanent Disability Forgiveness

If your disability is expected to last 60 months or more, you may qualify for permanent disability forgiveness. Qualifying for Permanent Disability Forgiveness requires a visit to your doctor, and individuals enrolled in the program are subject to three years of post-discharge monitoring.



## Wage Garnishment Prevention

Federal law requires that the Department of Education or a guaranty agency notify you before instituting wage garnishment. You have the right to a hearing, where you can challenge the stated amount owed and negotiate the terms of the repayment schedule.

We can intervene on your behalf. **FFC-AID-3**



payments have been made.

prevent wage garnishments.

## A FEW STATISTICS ABOUT STUDENT LOAN CRISIS

**1.2 Trillion**

### **National Student Debt**

The national student loan debt is now 1.2 trillion dollars. 1 trillion of these are in federal student loans. Let us help you through this national crisis. Call today for a free evaluation.

**40 Million**

### **Students with Debt**

In 2014, an estimated 40 million current and former students were in debt because of student loans. If you are one of the millions of people struggling to pay student loans, Aiding Student Relief is here to help.

**\$33,000**

### **Average Student Debt**

The graduating class of 2014 average \$33,000 of student loan debt per person. That's \$3,000 more than the average in 2013. Don't be one of the many. Let Aiding Student Relief advocate for you.

"Aiding Student Relief has helped countless people reduce their student debt. Their proven business plan has led to one of the highest success rates in the industry."

**John Standiford**

Associated

**FTC-AID-4**

Exhibit A  
23



# TESTIMONIALS

What Our Clients Are Saying About Us

"Thanks to Aiding Student Relief, I'm saving \$250 per month."



Michael Martin  
Entrepreneur

"I was overwhelmed, but Aiding Student Relief explained the process, and made everything clear and simple."



Emily Jalloul  
Teacher

"The experts at Aiding Student Relief were there to help me when I needed it most."



Paul Christiansen  
Nurse

"With so many programs, I didn't know what was right for me. My student loan advisor walked me through my options, and now I'm saving \$411/month."



Ariel Henriquez  
Sales Consultant

"Consolidating my loans into one monthly payment has made life simpler. Now I can focus on what matters to me."



Stephanie Selander  
Small Business Owner

"I love my job, but with my high student loan payments, I was still barely getting by. I don't know what I would have done without Aiding Student Relief."



AJ Olsen  
Museum Curator

## RECENT NEWS

This Is Whats Happening!



FTC-AID-5



JULY 9, 2014

### Debt Collective Demands

The Debt Collective is a group of college students calling themselves the "Corinthian Fifteen" who are refusing to pay back their student loans. As part of this effort, the Debt Collective has written an open letter to the Department of Education...

Read more



JULY 9, 2014

### Student Debt Crisis

May be largely about smallest borrowers U.S. News & World Report-May 16, 2015 last month, the Federal Reserve Bank of New York reported that student loan balances rose to 1.6 trillion and that 11.3 percent of that is in....

Read more



JULY 9, 2014

### Business Latest: Student

**Loan Crisis** is far from over. Two new reports suggest the student loan crisis is easing somewhat as the economy improves, but the crisis is far from over. the College Board reports total borrowing fell by 8 percent between 2012-13 and 2013-14. The organization...

Read more

# TAKE THE NEXT STEP

If your student loan payments are not affordable, let Aiding Student help. Aiding Student will work with you and your lender to find the assistance program that is right for you. We can help you reduce and simplify your payments. Contact one of our specialists today for a free evaluation.

APPLY NOW

## About Us

Aiding Student Relief has a staff of trained experts on standby to help you. Contact us today for a free evaluation.

## Address

Aiding Student Relief  
600 Anton Blvd Suite 11th Floor  
Costa Mesa, CA 92626  
Telephone: **855.510.5400**  
Email: info@aidingstudent.com



#### PRIVACY POLICY

This privacy statement discloses the privacy practices for Aiding Student Relief. Because Aiding Student Relief wants to demonstrate its firm commitment to your privacy, Aiding Student Relief has agreed to disclose its information gathering and dissemination practices. Aiding Student Relief will notify you of:

#### INFORMATION COLLECTION AND USE

Aiding Student Relief is the sole owner of the information collected on this site. We will not sell, share or rent this information to others in ways different from what is disclosed in this statement. Aiding Student Relief collects information through this site from our prospective and existing clients at several different points on our web site. We use their contact information to send information about our company and to service existing accounts. Users may opt-out of receiving future mailings; see the choice/opt-out section below. Contact and Financial information that is collected is used for verifying your name, address and other information, as well as to bill you for your use of our services using information from third party sources. Information about your computer hardware and software is automatically collected by Aiding Student Relief and may be shared in aggregate with third parties whose services are used for traffic analysis purposes. This information includes: your IP address, browser type, domain names, access times and referring Web site addresses. This information is not tied to personally identifiable information. This information is used by Aiding Student Relief to maintain and improve the quality of the service and to generate statistics regarding use of the Aiding Student Relief site. We use third party services to bill for services and to provide other services like our "Live Help" chat. We store the transcripts from these chats for customer service improvement. These third party service providers are not permitted to use your information for any secondary purposes.

Thank you and cheers!

# EXHIBIT B

# AIDINGSTUDENTRELIEF

HOME SERVICES ABOUT US FAQ BLOG CONTACT US | Q

## 100% Customer Satisfaction

We can help you reduce and simplify your payments. Call one of our specialists today.



### Loan Forgiveness

If you are a teacher, public service worker, or an individual with total and permanent disability you may qualify for this program.



### Consolidating Your Loans

Consolidating your loans to one new loan under one lender may lower your payments and make your life a bit more manageable.



### Affordable Payments

If you are looking to lower your monthly payments, then Income Based Repayment Plans may be the correct choice for you.



### Forbearance & Deferment

If you are still in school and struggling to make payments on your student loans. You may qualify for Forbearance & Deferment.



### Garnishment Prevention

Federal law requires that the Department of Education or guarantee agency notifies you before they begin garnishing your wages.



#### Loan Forgiveness Programs

In some cases, individuals with Federal Student Loans may qualify to have a portion of the amount owed may be forgiven.



#### Permanent Disability Forgiveness

If your disability is expected to last 60 months or more, you may qualify for permanent disability forgiveness.



#### Income Based Payments

A period of financial hardship may qualify you for an Income Based Repayment Plan. In many cases, this means you pay nothing.



#### Public Service Loan Forgiveness

If you work for a government organization at a city, state, or federal level, you may qualify for the Public Service Loan Forgiveness program.

### Loan Consolidation

You may be able to combine multiple federal student loans into one new loan with a lower, more affordable monthly payment. Loan consolidation programs can help you qualify for additional programs, like loan forgiveness programs or Public Service Loan Forgiveness.

[READ MORE](#)

Meet some of our members who have saved big on their student loan debt.

Helping You **Save Big**

*"Thanks to Aiding Student Relief, I am savings \$250 per month."*



Michael Martin  
*Entrepreneur*



If you have questions

We have **the answers**





### Outstanding Service Only

Get the answers! Talk to one of our student loan advisors to

(888) 457-0755

[CHECK ELIGIBILITY](#)

ABOUT AIDINGSTUDENT RELIEF	CHECK YOUR ELIGIBILITY	OUR LATEST BLOGS	CONTACT US
<p>the information collected on this website. We will not sell, share or rent this information to others in ways different from what is disclosed in this statement. If you have questions regarding how your information is used on this website please contact us at <a href="mailto:info@aidingstudents.com">info@aidingstudents.com</a></p>	<ul style="list-style-type: none"><li>&gt; FAQ</li><li>&gt; BLOG</li><li>&gt; CHECK ELEGIBILITY</li><li>&gt; PRIVACY POLICY</li><li>&gt; TERMS AND CONDITIONS</li></ul>	 <p><b>STUDENT LOANS!</b> October 7, 2016</p>  <p><b>How a Change of City can Change your Life (and Loan)!</b> August 23, 2016</p>	<p><a href="mailto:info@aidingstudents.com">info@aidingstudents.com</a> 600 Anton Blvd Suite 11th Floor Costa Mesa, CA 92626</p>

# EXHIBIT C



# AIDINGSTUDENTRELIEF

## Something awesome is coming soon

We are building something very cool. Stay tuned and be patient. Your patience will be well paid.

### About Us

We can help you reduce and simplify your payments.

Call one of our specialists today.



#### Loan Forgiveness

If you are a teacher, public service worker or an individual with total or permanent disability you may qualify for this program.



#### Income Based Payments

A period of financial hardship may qualify you for an Income Based Repayment Plan. In many cases, this means you not paying.



#### Garnishment Prevention

Federal law require that the Department of Education or guarantee agency notify you before they begin garnishing your wages.

## Subscribe & Stay Updated

Enter Your Name

Enter Your Email

If you want to be notified as soon as we are ready, please leave your information in the form to the left. Thank you.

# EXHIBIT D

info@aidnest.com  
(800) 555-1212



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### Student Loan Forgiveness

If you have Federal Student Loans, you're in the right place to get those loans reduced, forgiven or completely discharged through our student loan forgiveness programs.

### Loan Consolidation

Get your multiple Federal Student Loans consolidated into one, forget about increasing interests and pay month to month at the lowest possible cost.

### Student Loan Forgiveness

We understand if you're going through some hardship, and that's why with us you'll be able to make monthly payments based on your affordability, for as low as \$0.00, depending on your situation.

# Knowledge Base

Our knowledge base is designed to provide information regarding some of the critical topics those with student loans must be aware of to be able to make educated decisions regarding their future.

## Defaulted Student Loans

If you're in default, you don't have to worry anymore – not only can we enroll you into one of our rehabilitation programs, but also your credit score will show in good standing within 6 to 9 months.

## Student Loan Rehabilitation

If you're in default, you don't have to worry anymore – not only can we enroll you into one of our rehabilitation programs, but also your credit score will show in good standing within 6 to 9 months.

## Deferment and Forbearance

Temporarily allowing you to postpone or reduce your federal student loan payments. Postponing or reducing your payments may help you avoid default and future garnishments.

## Wage Garnishment

A wage garnishment is any legal procedure in which some portion of a person's earnings is required to be withheld by an employer for the payment of a debt.

## Income Based Repayment Plan

With this program your payments change as your income changes and will not be longer than 25 years. This is the ideal plan if you are in partial financial hardship. Your monthly payments will be lower and you'll pay more for your loan over time than you would under the 10-year standard plan.

## Pay As You Earn Repayment Plan

Your monthly payments will be lower and you'll pay more for your loan over time than you would under the 10-year standard.

There are no obligations or commitments. **YOUR ASSESSMENT IS ABSOLUTELY FREE.**

Call (561)424-6053 today to go over your options.



# Testimonials

## Latest News

[Why 2016 Will Be a Big Year For Student Loans](#)

[Top Student Loan Refinancing Questions of 2015](#)

[Obama's latest student loan plan](#)

[Things You Should Know About Public Service Loan Forgiveness](#)

## Recent Posts

[pay-grandchild-studen](#)

[Why 2016 Will Be a Big Year For Student Loans](#)

December 30, 2015

[12511110\\_111236751](#)

[Top Student Loan Refinancing Questions of 2015](#)

December 30, 2015

About Us

We stand by our consultation and quote. We are so sure and confident about our services and offers that they are all 100% money back guarantee, risk free – if we don't do what we promise, you'll get your money back.

Contact Info

(800) 555-1212

[AidnestStudenLoans@gmail.com](mailto:AidnestStudenLoans@gmail.com)

18100 Von Karman Ave Suite 850 Irvine, CA 92612

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# EXHIBIT E

Call one of our specialists today.

### Forbearance & Deferment

If you are still in school and struggling to make payments on your student loans. You may qualify for Forbearance & Deferment.

### Garnishment Prevention

Federal law requires that the Department of Education or guarantee agency notifies you before they begin garnishing your wages.

### Loan Forgiveness

If you are a teacher, public service worker, or an individual with total and permanent disability you

may qualify for this program.

## Consolidating Your Loans

Consolidating your loans to one new loan under one lender may lower your payments and make your life a bit more manageable.

## Affordable Payments

If you are looking to lower your monthly payments, then Income Based Repayment Plans may be the correct choice for you.

**Learn more about our services**

LEARN MORE

Loan Forgiveness Programs

Income Based Payments

Student Loan Rehabilitation

Student Loan Consolidation

---

You may be eligible for

## Loan Forgiveness Programs

In some cases, individuals with Federal Student Loans may qualify to have a portion of the amount owed to be forgiven.

Get in touch with our professional team to find out which loan forgiveness program you qualify for and how you can get rid of your unpaid student loan.

LEARN MORE



**There are no obligations or commitments.**

**YOUR ASSESSMENT IS ABSOLUTELY FREE**

### Meet your Budget

One of our advisers will help you meet your payment goals by using your budget and timeline to determine the best plan available.

## Simple Process

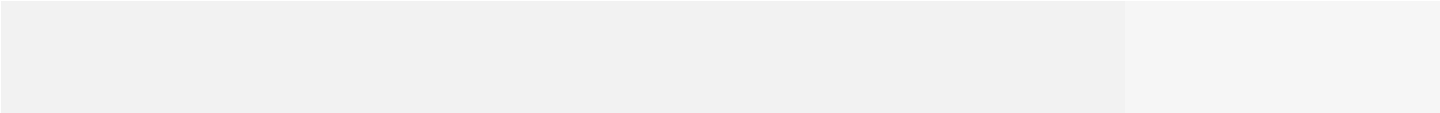
We understand that lowering your payments alone can be difficult. Our intuitive platform allows us to keep the entire process simple.

## Customer Satisfaction

We are committed to providing you with outstanding service only. We look forward to working with you.

## **100% money back guarantee**

No Hassle Money Back Policy



**Lower your loan payments  
by getting in touch with  
one of our professionals**

We design a customized repayment plan that will allow you to make payments based on your monthly income, family size, and spending. Get rid of the hassle of extensive paperwork and get the help you deserve.

What we can help you achieve a lower payment or lower rate.

How a Change of City can Change your Life  
(and Loan)!

The Argument for Tuition-Free College

We stand by our consultation and quote. We are so sure and confident about our services and offers that they are all 100% money back guarantee, risk free – if we don't do what we promise, you'll get your money back.

CONTACT INFO

info@aidnest.com

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Irvine, CA 92612

1651 E. Fourth St.  
Santa Ana, CA 92701

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## INCOME BASED PAYMENTS

If you are suffering from a financial hardship, you may be eligible for an Income Based Payment. In this repayment program, you would have a payment based on your income and family size. The payment could be as low as \$0.00 per month, with forgiveness at the end of 20-25 years.

LEARN MORE



## LOAN FORGIVENESS

If you have Federal Student Loans you may qualify for any of the student loan forgiveness programs that are available to borrowers. You may be eligible for principal reduction, loan forgiveness, or a complete loan discharge depending on your individual circumstance.

LEARN MORE



## PRIVATE STUDENT LOAN CONSOLIDATION

Much like refinancing a mortgage, generally the biggest benefit of private student loan consolidation/student loan refinancing is a lower interest rate

(something federal consolidations do not offer).

LEARN MORE



## STUDENT LOAN REHABILITATION

You can renew eligibility for new loans and grants and eliminate the loan default by “rehabilitating” a defaulted loan.

CHECK ELEGIBILITY



## WAGE GARNISHMENT

A wage garnishment is any legal procedure in which some portion of a person's earnings is required to be withheld by an employer for the payment of a debt.

LEARN MORE



With our fast, friendly and professional services we'll be glad to help you get your student loans reduced, forgiven or completely discharged. To this end, we'll assist you in consolidating all your student loans, so you'll have only one lender and you'll start making one monthly payment. Our professionals will walk you through the best and most flexible repayment options, and if it's also necessary, varied deferment options and rehabilitation programs.

## Our CRM System

Our CRM is one of the most advanced in the industry and most importantly, it's linked directly to the Department of Education (DOE). This keeps your personal and most confidential information safe. Furthermore because our CRM system is linked to the DOE, our approval is 100%. Through our CRM we will be doing continuous monitoring of our process without losing sight of your immediate needs, ensuring that your case has the proper handling and most efficient process.

RECENT POSTS

How a Change of City can Change your Life  
(and Loan)!

The Argument for Tuition-Free College

ABOUT US

We stand by our consultation and quote. We are so sure and confident about our services and offers that they are all 100% money back guarantee, risk free – if we don't do what we promise, you'll get your money back.

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