REDEFINE LAW FIRM, INC.
BABAK LALEZARI (SBN 261703)
BLalezari@redefinelawfirm.com
4311 Wilshire Blvd., Suite #205
Los Angeles, CA 90010
Telephone: (310) 571-5297
Facsimile: (310) 684-5793

Attorney for Defendants
M&T Financial Group,
American Counseling Center Corp.,
and Salar Tahour

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

M&T FINANCIAL GROUP, et al.,

Defendants.

Case No. 17-cv-06855-ODW-PLA

DEFENDANTS' DISCLOSURE STATEMENT

TO THE CLERK OF THE ABOVE-ENTITLED COURT, AND PLAINTIFF AND THEIR COUNSEL OF RECORD:

Pursuant to Federal Rule of Civil Procedure 7.1 and Central District of California Local Rule 7.1-1, Defendants provide the following corporate disclosure statement:

The undersigned, counsel of record for Defendants in the above-captioned action, certifies that the following listed party (or parties) may have a pecuniary interest in the outcome of this case. These representations are made to enable the Court to evaluate possible disqualification or recusal.

(1) Defendant M&T Financial Group (also d/b/a StuDebt, Student Debt Relief Group, SDRG, Student Loan Relief Counselors, SLRC, and Capital Advocates Group), which has no parent corporation nor any publicly held corporation owning more than 10% of its stock;

(2) Defendant American Counseling Center Corp. (also d/b/a StuDebt, Student Debt Relief Group, SDRG, Student Loan Relief Counselors, SLRC, and Capital Advocates Group), which has no parent corporation nor any publicly held corporation owning more than 10% of its stock;

(3) Defendant Salar Tahour, an individual.

DATED: September 29, 2017

REDEFINE LAW FIRM, INC.

/s/ Babak Lalezari

Babak Lalezari

Attorney for Defendants M&T Financial Group, American Counseling Center Corp., and Salar Tahour

PROOF OF SERVICE

I, **Babak Lalezari**, declare as follows:

I am employed in the County of Los Angeles, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 4311 Wilshire Blvd., Suite #205, Los Angeles, California 90010, in said County and State. On September 29, 2017, I served the parties with:

DEFENDANTS' DISCLOSURE STATEMENT

by the following means of service:

☑ **BY CM/ECF Electronic Service:** I caused such document to be served via the Court's (NEF) electronic filing system on all registered parties.

☐ **BY UNITED STATES MAIL:** I placed a true copy in a sealed envelope or package addressed to the persons as indicated above, on the above-mentioned date, and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited with the U.S. Postal Service in the ordinary course of business in a sealed envelope with postage fully prepaid. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing set forth in this declaration.

I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Los Angeles, California.

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

Executed on September 29, 2017 in Los Angeles, California.

/s/ Babak Lalezari
Babak Lalezari