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Attorneys for Defendants

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

M&T FINANCIAL GROUP, a corporation, also d/b/a StuDebt, Student Debt Relief Group, SDRG, Student Loan Relief Counselors, SLRC, and Capital Advocates Group; AMERICAN COUNSELING CENTER CORP., a corporation, also d/b/a StuDebt, Student Debt Relief Group, SDRG, Student Loan Relief Counselors, SLRC, and Capital Advocates Group; and SALAR TAHOUR, individually and as an officer of M&T FINANCIAL GROUP and AMERICAN COUNSELING CENTER CORP.

Defendants.

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

Hon. Otis D. Wright II

DECLARATION OF SALAR TAHOUR

Pursuant to 28 U.S.C. § 1746, I, SALAR TAHOUR, declare as follows:

1. I make this declaration in my personal capacity and on behalf of the other Defendants.

2. Pursuant to Section X of the *Ex Parte* Temporary Restraining Order with Asset Freeze, Appointment of a Receiver, Other Equitable Relief, and Order to Show Cause Why a Preliminary Injunction Should Not Issue (the "TRO"), I hereby advise that none of the Defendants have any documents or assets located outside of the territory of the United States of America.

3. Pursuant to Section XIII of the TRO, I hereby advise that, other than my counsel in this case, I sent the TRO by e-mail to three attorneys from whom I sought counsel for this case. The information as to each of those e-mails is as follows:

a. Steven J. Krause, Ananda & Krause, 1695 Mesa Ridge Avenue, Westlake Village, CA 91362-5252, (818) 970-7333, on September 20, 2017.

b. Michael J. Proctor, Boies Schiller Flexner LLP, 725 S. Figueroa Street, 31st Floor, Los Angeles, CA 90017, (213) 629-9040, on September 21, 2017.

c. Reuven L. Cohen, Cohen Williams Williams LLP, 724 South Spring Street, 9th Floor, Los Angeles, CA 90014, (213) 232-5160, on September 21, 2017.

FURTHER DECLARANT SAYETH NAUGHT.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury and of the laws of the United States that the foregoing is true and correct.

Dated: September 29, 2017

Salar T.
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 OCTOBER 2, 2017, I served the parties with:

DECLARATION OF SALAR TAHOUR

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 OCTOBER 2, 2017 in Los Angeles, California.

/s/ Babak Lalezari
Babak Lalezari