

**DECLARATION OF TIMOTHY HANSON
PURSUANT TO 28 U.S.C. § 1746**

I, Timothy Hanson, hereby state that I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify as follows:

1. I am a citizen of the United States and am over eighteen (18) years of age. I am an employee of the Consumer Financial Protection Bureau (“CFPB” or “Bureau”). I am a Forensic Accountant working in the Office of Enforcement in the Bureau’s office in Washington, D.C. As an employee of the Bureau, my current duties include conducting financial and data analysis as evidence for investigations. I have been an employee of the Bureau since December 16, 2012. I received a Bachelor’s of Business Administration in accounting from James Madison University in 2000.

2. As part of my job, I research and investigate persons and entities that may be violating the Consumer Financial Protection Act and other statutes enforced by the Bureau. I was assigned to work on the Bureau’s investigation of Strategic Financial Solutions, LLC that led to the lawsuit against the following entities:

Corporate Defendants

- Strategic Family, Inc.;
- StratFS, LLC (f/k/a Strategic Financial Solutions, LLC);
- Strategic Client Support, LLC (f/k/a Pioneer Client Services, LLC);
- Strategic CS, LLC;
- Strategic FS Buffalo, LLC;
- Strategic NYC, LLC;
- BCF Capital, LLC;
- T Fin, LLC;

- Strategic Consulting, LLC (f/k/a Consult America, LLC);
- Versara Lending, LLC (f/k/a Fusion Processing, LLC);
- Anchor Client Services, LLC (now known as CS 1 PaaS Services, LLC);
- Bedrock Client Services, LLC (f/k/a HCS, LLC);
- Boulder Client Services, LLC;
- Canyon Client Services, LLC;
- Carolina Client Services, LLC;
- Great Lakes Client Services, LLC;
- Guidestone Client Services, LLC;
- Harbor Client Services, LLC;
- Heartland Client Services, LLC;
- Monarch Client Services, LLC (now known as CS 2 PaaS Services, LLC);
- Newport Client Services, LLC;
- Northstar Client Services, LLC;
- Option 1 Client Services, LLC;
- Pioneer Client Servicing, LLC (f/k/a Strategic Financial Solutions, LLC);
- Rockwell Client Services, LLC;
- Royal Client Services, LLC;
- Stonepoint Client Services, LLC;
- Summit Client Services, LLC (now known as CS 3 PaaS Services, LLC);
- Whitestone Client Services, LLC (collectively, “Corporate Defendants”);

Individual Defendants

- Ryan Sasson;

- Jason Blust (collectively, together with Corporate Defendants, “Defendants”);

Relief Defendants

- Daniel Blumkin;
- Albert Ian Behar;
- Strategic ESOP;
- Strategic ESOT;
- Twist Financial, LLC;
- Duke Enterprises, LLC;
- Blaise Investments, LLC;
- The Blust Family Irrevocable Trust, through Donald J Holmgren, Trustee;
- Jaclyn Blust;
- Lit Def Strategies, LLC; and
- Relialit, LLC (collectively, “Relief Defendants”).

3. Collectively, Strategic Family, Inc., StratFS, LLC (f/k/a Strategic Financial Solutions, LLC), Strategic Client Support, LLC (f/k/a Pioneer Client Services, LLC), Strategic CS, LLC, Strategic FS Buffalo, LLC, Strategic NYC, LLC, BCF Capital, LLC, T Fin, LLC, Strategic Consulting, LLC (f/k/a Consult America, LLC), and Versara Lending, LLC (f/k/a Fusion Processing, LLC) are herein referred to as “SFS.”

4. Collectively, Anchor Client Services, LLC (now known as CS 1 PaaS Services, LLC), Bedrock Client Services, LLC (f/k/a HCS, LLC), Boulder Client Services, LLC, Canyon Client Services, LLC, Carolina Client Services, LLC, Great Lakes Client Services, LLC, Guidestone Client Services, LLC, Harbor Client Services, LLC, Heartland Client Services, LLC, Monarch Client Services, LLC (now known as CS 2 PaaS Services,

LLC), Newport Client Services, LLC, Northstar Client Services, LLC, Option 1 Client Services, LLC, Pioneer Client Servicing, LLC (f/k/a Strategic Financial Solutions, LLC), Rockwell Client Services, LLC, Royal Client Services, LLC, Stonepoint Client Services, LLC, Summit Client Services, LLC (now known as CS 3 PaaS Services, LLC), and Whitestone Client Services, LLC are herein referred to as the “Client Services Subsidiaries.”

5. SFS and the Client Services Subsidiaries, as defined above, are referred to collectively as “Corporate Defendants.” Ryan Sasson and Jason Blust are referred to collectively as “Individual Defendants.” And the Corporate Defendants with the Individual Defendants are referred to collectively as “Defendants.”

6. Defendants partner with purported law firms around the country to offer debt-relief services to consumers. These firms are not named as defendants in Plaintiffs’ action. They are referred to herein as “Façade Firms” because most or all of the debt-relief services are carried out by non-attorneys who are not members of the firm. The Façade Firms include the following:

- A. Florio & Associates, PLLC d/b/a Bedrock Legal Group f/k/a Raggio & Associates, PLLC;
- Anchor Law Firm, PLLC;
- Boulder Legal Group, LLC;
- The Brian A Moore Law Firm LLC d/b/a Guidestone Law Group;
- Burnette Legal Group, LLC d/b/a Monarch Legal Group;
- Daniel Rufty Legal PLLC d/b/a Carolina Legal Services;
- Donald Norris Associates PLLC d/b/a Stonepoint Legal Group;
- Gardner Legal LLC d/b/a Option 1 Legal;

- Great Lakes Law Firm, LLC;
 - Greene Legal Services, LLC d/b/a Newport Legal Group;
 - Harbor Legal Group, LLC;
 - Henry Legal Group, LLP d/b/a Heartland Legal Group;
 - Hodyno & Associates, PLLC d/b/a Rockwell Legal Group;
 - JMS Industries, LLC d/b/a Canyon Legal Group, LLC;
 - Pioneer Law Firm, P.C., f/k/a John B. Dougherty P.C.;
 - Northstar Legal Group, LLC;
 - Royal Legal Group, LLC;
 - The Sands Law Group, A Professional Law Corporation d/b/a Whitestone Legal Group; and
 - WyoLaw, LLC d/b/a Summit Law Firm.
7. As part of my work on this matter, I:
- a. analyzed records maintained by financial institutions, including KeyBank National Association (KeyBank), Bank of America, National Association (Bank of America), Associated Bank, National Association (Associated Bank), JPMorgan Chase Bank, National Association (JPMorgan Chase), and Bank Leumi USA, acquired by Valley National Bank on April 1, 2022 (Valley Bank);
 - b. reviewed documents responsive to Civil Investigative Demands (CIDs) regarding Defendants;
 - c. spoke with Investigators Theresa Ridder and Patrick Callahan;
 - d. reviewed the declaration signed by Joanna Cohen; and

- e. reviewed documents responsive to requests made by certain State Attorney Generals' Offices.

The Corporate Defendants operate as a common enterprise

8. I analyzed bank accounts held at Valley Bank by Pioneer Client Servicing, LLC, Boulder Client Services, LLC, and Bedrock Client Services, LLC. Between October 2016 and August 2018, each of these Client Services Subsidiaries transferred millions of dollars to various companies in the Corporate Defendants' common enterprise, including Strategic Client Support, LLC, Strategic NYC, LLC, Strategic CS, LLC, and Strategic Consulting, LLC.

Sasson controls the Corporate Defendants

9. I reviewed a Bank Leumi Deposit Capture Setup Form from Valley Bank that lists the Lead company name as Strategic Financial Solutions, LLC, and lists account numbers for Versara Lending, RAM Repayment Account; Versara Lending, Global Repayment account; Versara Lending, Main Account; and Strategic LD, LLC. Sasson signed this document as the "Company Authorization." (Exhibit 4, pp. 41-42.)

10. Sasson signed account-opening paperwork at Valley Bank for Strategic Financial Solutions, LLC. (Exhibit 4, pp. 2-7.)

11. Sasson signed a Master Signature Card from KeyBank. This document shows Sasson as the Authorized Officer for several accounts under the parent company of Strategic Financial Solutions, LLC, including the following:

- Anchor Client Services, LLC;
- BCF Capital, LLC;
- Bedrock Client Services, LLC;
- Boulder Client Services, LLC;

- Canyon Client Services, LLC;
- Carolina Client Services, LLC;
- Great Lakes Client Services, LLC;
- Harbor Client Services, LLC;
- Pioneer Client Servicing, LLC;
- Rockwell Client Services, LLC;
- Royal Client Services, LLC;
- Stonepoint Client Services, LLC;
- Strategic Financial Solutions, LLC;
- Strategic Client Support, LLC;
- Strategic Consulting, LLC;
- Strategic CS, LLC;
- Strategic FS Buffalo, LLC;
- Strategic NYC, LLC; and
- Summit Client Services, LLC. (Exhibit 2, pp. 29-31.)

**Relationships Between Client Services Subsidiaries and Corresponding
Façade Firms**

12. The KeyBank records show the following Client Services Subsidiaries and Façade Firms sent and/or received checks from one another between July 2018 and August 2020:

- a. Anchor Client Services, LLC and Anchor Law Firm, PLLC (Exhibit 2, pp. 52-53);
- b. Bedrock Client Services, LLC and Raggio & Associates d/b/a/ Bedrock Legal PLLC, PLLC (Exhibit 2, pp. 65, 70);

- c. Boulder Client Services, LLC and Boulder Legal Group, LLC (Exhibit 2, pp. 71, 77);
- d. Carolina Client Services, LLC and Carolina Legal Services (Exhibit 2, pp. 91, 97);
- e. Great Lakes Client Services, LLC and Great Lakes Law Firm, LLC (Exhibit 2, pp. 106, 112);
- f. Harbor Client Services, LLC and Harbor Legal Group, LLC (Exhibit 2, pp. 116, 121);
- g. Heartland Client Services, LLC and Henry Legal Group, LLP d/b/a Heartland Legal Group (Exhibit 2, pp. 130, 133);
- h. Monarch Client Services, LLC and Burnette Legal Group, LLC d/b/a Monarch Legal Group (Exhibit 2, pp. 135, 139);
- i. Northstar Client Services, LLC and Northstar Legal Group, LLC (Exhibit 2, p. 141);
- j. Option 1 Client Services, LLC and Gardner Legal LLC d/b/a Option 1 Legal (Exhibit 2, pp. 143, 145);
- k. Rockwell Client Services, LLC and Rockwell Legal Group (Exhibit 2, pp. 150, 156);
- l. Royal Client Services, LLC and Royal Legal Group, LLC (Exhibit 2 at 167);
- m. Stonepoint Client Services, LLC and Stonepoint Legal Group (Exhibit 2, pp. 173, 178);
- n. Summit Client Services, LLC and WyoLaw LLC d/b/a Summit Law Firm (Exhibit 2, pp. 217-18); and,

- o. Whitestone Client Services, LLC and The Sands Law Group, LLP d/b/a Whitestone Legal Group (Exhibit 2, pp. 189, 193).

13. The KeyBank records show Canyon Client Services, LLC sent and received wire transfers from JMS Industries, LLC d/b/a Canyon Legal Group, LLC during April 2020.(Exhibit 2, pp. 215-16.)

14. The KeyBank records show that the Client Services Subsidiaries stopped receiving funds from RAM and Global to their KeyBank accounts around March 2021, which suggests to me that the Client Services Subsidiaries started to transition to a new bank around that time.

Façade Firms

15. Documents from Associated Bank show that, in general, Façade Firms followed similar patterns with deposits and withdrawals or payments. They generally received deposits from RAM or Global as well as from the affiliated Client Services Subsidiary. The Façade Firms typically made monthly payments of \$1,700 to companies owned by Jason Blust—initially to Relialit and later to Lit Def Strategies. (Exhibit 14, pp. 45-46, for examples of these transactions.)

Blust controls and is heavily involved with companies that are part of the scheme

16. I reviewed the Business Account Application form for Pioneer Law Firm PC, from Associated Bank records. The application, dated March 13, 2019, lists Jason Blust as Vice President of the firm. (Exhibit 14, p. 11). Associated Bank records also show Jason Blust as the sole beneficial owner of Pioneer Law Firm, P.C. (Exhibit 14, p. 35). According to my review of records from Valley Bank, between May 2018 and June 2018, Pioneer Law Firm received approximately \$51,800 from Client Services Subsidiaries.

Defendants have a Track Record of Changing Banks

17. Records from Valley Bank show that the Client Services Subsidiaries stopped receiving deposits from RAM and Global in July 2018. Records from Valley Bank show that the Client Services Subsidiaries' accounts were closed in October 2018. (Exhibit 4, p. 113.)

18. My review of records from KeyBank led me to conclude that the Client Services Subsidiaries received deposits from RAM and Global into KeyBank accounts between July 2018 and March 2021. Records from KeyBank show that the Client Services Subsidiaries' accounts, along with numerous SFS accounts, were closed in June 2021. (Exhibit 2, pp. 198-99.) Records from KeyBank do not show the name of the next bank.

19. Records from KeyBank show that Strategic Financial Solutions, LLC and Strategic Family, Inc. took out a commercial loan for over \$35,000,000 from CIBC Bank, USA in April 2018. (Exhibit 2, pp. 205-07.)

Money from consumers' escrow accounts is sent to SFS' Client Services Subsidiaries and Façade Firms, among others.

20. As explained in Patrick Callahan's declaration, RAM and Global withdraw fees from consumers' escrow accounts, and, as Joanna Cohen explains in her declaration, records from RAM show that much of this money is sent to accounts under the names of the Client Services Subsidiaries or Façade Firms. (Decl. of P. Callahan and Decl. of J. Cohen.) Based on my review, records from Key Bank show that RAM sent money to Bedrock Client Services, LLC, using the customer name "Bedrock Client Support." (Exhibit 2, pp. 219-21.)

21. My review of KeyBank records led me to conclude that the Client Services Subsidiaries routinely sent large checks to the associated Façade Firm, and the Façade Firm usually sent a smaller check back to the Client Services Subsidiaries labeled “client refunds.” These transactions typically occurred monthly. For example, I analyzed the transactions between Anchor Client Services, LLC and Anchor Law Firm. Between July 2018 and February 2020, Anchor Client Services, LLC sent over \$1,300,000 to Anchor Law Firm. Between July 2018 and February 2020, Anchor Law Firm sent approximately \$340,000 to Anchor Client Services, LLC. (Exhibit 2, pp. 52, 222-29.)

22. After reviewing records from Valley Bank and Key Bank, I calculated that, between September 2016 and December 2022, the Client Services Subsidiaries, Strategic CS, LLC, Versara Lending, LLC, and BCF Capital, LLC received a total of approximately \$562,100,000 from RAM and Global.

23. After reviewing records from Associated Bank and Bank of America, I calculated that, between January 2016 and December 2022, the Façade Firms received approximately \$101,000,000 from RAM and Global.

24. After reviewing records from Associated Bank, I calculated that, between December 2019 and April 2021, Lit Def Strategies, LLC received deposits from Façade Firms totaling approximately \$31,100,000.

Bank records suggest that SFS consolidates money received from the Client Services Subsidiaries into various accounts owned by SFS entities or entities related to SFS

25. My review of records from Valley Bank and KeyBank led me to conclude that many Client Services Subsidiaries regularly sent large amounts of money to Strategic Client Support, LLC, Strategic CS, LLC, Strategic Consulting, LLC, T Fin, LLC and Strategic NYC, LLC.

26. My review of records from Valley Bank led me to conclude that, between October 2017 and December 2020, an account by Strategic NYC, LLC shows incoming transfers totaling approximately \$73,000,000 from at least 9 different Client Services Subsidiaries, incoming transfers from various other SFS entities of approximately \$26,700,000, and outbound transfers totaling approximately \$96,600,000 to at least 8 different SFS entities, including Versara Lending, LLC, Strategic CS, LLC, Strategic Consulting, LLC, Strategic Financial Solutions, LLC, and Strategic Client Support, LLC.

27. My review of records from Valley Bank led me to conclude that, from October 2016 to August 2022, Strategic, LLC and various SFS entities, including Strategic NYC, LLC, T Fin, LLC, Strategic Consulting, LLC, Versara Lending, LLC, Strategic Family, Inc., and Strategic Financial Solutions, LLC, transferred over \$177,000,000 of money to Versara Lending, LLC. And Versara Lending, LLC wired over \$85,000,000 to an account held by Versara DNLFA.

28. My review of records from KeyBank led me to conclude that, between approximately July 2018 and April 2021, over \$390,000,000 were sent to T Fin, LLC and Strategic NYC, LLC by Client Services Subsidiaries, including Anchor Client Services, LLC, Bedrock Client Services, LLC, Boulder Client Services, LLC, Canyon Client Services, LLC, Carolina Client Services, LLC, Harbor Client Services, LLC, Heartland Client Services, LLC, Monarch Client Services, LLC, Northstar Client Services, LLC, Option 1 Client Services, LLC, Pioneer Client Servicing, LLC, Rockwell Client Services, LLC, Royal Client Services, LLC, Stonepoint Client Services, LLC, Summit Client Services, LLC, and Whitestone Client Services, LLC. (Exhibit 14, pp. 178-93.)

SFS and the Versara Entities then sent money to Sasson, Behar, and Blumkin, as well as the Mandaree Enterprises

29. My review of records from Valley Bank led me to conclude that, between October 2016 and September 2017, SFS transferred almost \$9,000,000 to Relief Defendants Duke Enterprises, LLC, Twist Financial, LLC, and Blaise Investments, LLC. During this time period, SFS transferred over \$3,400,000 to Duke Enterprises, LLC, over \$2,200,000 to Twist Financial, LLC, and over \$3,200,000 to Blaise Investments, LLC. Sasson and Behar were listed as principals/owners on the SFS account that transferred the funds. (Exhibit 4, pp. 32, 120-23.)

30. Records from KeyBank show that in May 2018, November 2019, and March 2020, Strategic Family, Inc. transferred in aggregate over \$63,000,000 to Relief Defendants Duke Enterprises, LLC, Twist Financial, LLC, and Blaise Investments, LLC. During this time period, Strategic Family Inc transferred over \$23,600,000 to Duke Enterprises, LLC, over \$16,000,000 to Twist Financial, LLC, and over \$23,600,000 to Blaise Investments, LLC. (Exhibit 2, pp. 208-13.)

31. My review of records from Valley Bank led me to conclude that, between January 2017 and March 2021, Versara Lending LLC paid approximately \$135,400,000 to Mandaree Enterprises LLC and Dae Sung, LLC.

Façade Firms transferred significant amounts of money to companies owned by Jason Blust or the Blust Family Trust

32. Records from Associated Bank, show that Jason Blust was the sole controlling owner of an account held by Relialit, LLC. (Exhibit 14, p. 17.) And records from the Illinois Secretary of State, provided by Associated Bank, show that Blust is the agent and manager of Relialit, LLC. (Exhibit 14, pp. 36-37.)

33. Records from Associated Bank show that, from March 2019 to January 2020, the following façade firms collectively paid Relialit, LLC over \$236,300.

Firm Names
The Sands Law Group d/b/a Whitestone Legal Group
Burnette Legal Group
WyoLaw
Anchor Law Firm
Raggio and Associates
Boulder Legal Group
JMS Industries
Great Lakes Law Firm
Harbor Legal Group
Hodyno & Associates d/b/a Rockwell Legal Group
Donald Norris Associates d/b/a Stonepoint Legal Group
Royal Legal Group
Gardner Legal Group
Pioneer Law Firm
Henry Legal Group d/b/a Heartland Legal Group
Daniel Rufty Legal or Meg Sohmer Wood, both d/b/a Carolina Legal Services

34. Records from Associated Bank show that Jason Blust is the sole controlling owner of an account held by Lit Def Strategies, LLC. (Exhibit 14, p. 31.)

35. My review of records from Associated Bank and Bank of America led me to conclude that, from December 30, 2019 to March 30, 2021, the following Façade Firms collectively paid Lit Def Strategies, LLC over \$30,000,000:

- Anchor Law Firm PLLC;
- Raggio & Associates d/b/a Bedrock Legal PLLC;
- Boulder Legal Group LLC;
- JMS Industries, LLC d/b/a Canyon Legal Group PLLC;
- Daniel Rufty Legal PLLC d/b/a Carolina Legal Services;
- Great Lakes Law Firm, LLC;

- Harbor Legal Group LLC;
- Henry Legal Group;
- Burnette Legal Group d/b/a Monarch Legal Group;
- Greene Legal Services, LLC d/b/a Newport Legal Group;
- Northstar Legal Group LLC;
- Gardner Legal d/b/a Option 1 Legal Group;
- John Dougherty & Associates, d/b/a Pioneer Law Firm;
- Hodyno & Associates, PLLC d/b/a Rockwell Legal Group;
- Royal Legal Group;
- Donald Norris Associates PLLC d/b/a Stonepoint Legal Group;
- WyoLaw, LLC d/b/a Summit Law Firm; and
- The Sands Law Group d/b/a Whitestone Legal.

36. The Façade Firms listed in paragraph 35 generally paid approximately \$1,700 to Lit Def Strategies, LLC each month and then also paid much larger amounts quarterly or annually. (Exhibit 14, pp. 41-49.)

37. Associated Bank records show that, between March 2020 to April 2021, Lit Def Strategies, LLC transferred \$36,000,000 to the Blust Family Irrevocable Trust. (Exhibit 14, pp. 84-85, 89-95.)

38. Associated Bank records show that, between July 2020 and April 2021, the Blust Family Irrevocable Trust then transferred \$8,300,000 to Jaclyn Blust. (Exhibit 14, pp. 86-88.)

39. Associated Bank records show that Jason Blust is the sole controlling owner of an account for Credit Advocates Law Firm, LLC, (Exhibit 14, p. 34) and that

company made periodic payments to Jason Blust, the Law Offices of Jason Blust, LLC, and Strategic CS, LLC (Exhibit 14, pp. 58-68) and received periodic payments from Strategic CS, LLC. (Exhibit 14, pp. 69-70, 83.) Associated Bank records also show that Jason Blust is the sole controlling owner of an account for Lighthouse Tax & Financial, LLC, (Exhibit 14, p. 33) and that company made periodic payments to Strategic CS, LLC and received payments from Strategic CS, LLC. (Exhibit 14, pp. 75-79.)

Defendants' practices are evolving

40. Bank records suggest that the list of Façade Firms may have expanded beyond those included in the complaint. For example, documents downloaded from the Texas Secretary of State website show that Amber Florio is the registered agent for A. Florio & Associates, PLLC. (Exhibit 12, p.16-18). And JPMorgan Chase records show that Amber Florio is a member of Florio Law Firm, PLLC. (Exhibit 15, p. 1) In 2020, at least, records from JPMorgan Chase show that Florio Law Firm, PLLC received payments from the following Façade Firms:

- Anchor Law Firm, PLLC;
- Boulder Legal Group, LLC;
- Donald Norris Associates PLLC d/b/a Stonepoint Legal Group;
- Raggio & Associates PLLC, d/b/a Bedrock Legal PLLC;
- Gardner Legal, LLC;
- Greene Legal Group, LLC d/b/a Newport Legal Group;
- Harbor Legal Group, LLC;
- Henry Legal Group, LLP d/b/a Heartland Legal Group;
- Hodyno & Associates, PLLC d/b/a Rockwell Legal Group;

- JMS Industries, LLC d/b/a Canyon Legal Group, LLC;
- Pioneer Law Firm, P.C.;
- Royal Legal Group, LLC;
- The Sands Law Group, LLP d/b/a Whitestone Legal Group; and
- WyoLaw, LLC d/b/a Summit Law Firm, LLC. (Exhibit 15, pp. 2-14, 25).

And in 2020, at least, records from JPMorgan Chase show that Florio Law Firm, PLLC received payments from the following companies that may operate similarly to the Façade Firms:

- Chabner Legal and Associates, LLP d/b/a Golden Law, LLP;
- Chinn Legal Group LLC;
- Colonial Law Group, LLC;
- Dubin Legal Group LLC;
- Fontana Law Group LLC d/b/a Crimson Legal Group LLC;
- Frontier Consumer Law Group, LLC;
- Hinds Law LLC;
- Law Office of Amber Florio, PLLC d/b/a Commonwealth Law Group;
- Spring Legal Group, LLC;
- Phoenix Legal Group, PLLC; and
- Watson Law, LLC. (Exhibit 15, pp. 16-24, 26)

41. In addition, the following companies made payments to Relialit, LLC or Lit Def Strategies, LLC:

- Chabner Legal and Associates, LLP d/b/a Golden Law, LLP;
- Chinn Legal Group LLC;

- Colonial Law Group, LLC;
- Cornerstone Legal Group, LLC;
- Crimson Legal Group, LLC d/b/a Fontana Law Group, LLC;
- Dubin Legal Group LLC;
- Frontier Consumer Law Group, LLC;
- Law Office of Amber Florio, PLLC d/b/a Commonwealth Law Group;
- Phoenix Legal Group, PLLC;
- Turnbull & Associates, LLC; and,
- Turnbull Law Group LLC. (Exhibit 14, pp. 38-49).

42. My review of data from Associated Bank led me to conclude The Law Office 554 and Spring Legal Gro Bill.com also made payments to Relialit, LLC or Lit Def Strategies, LLC. (Exhibit 14, p. 55).

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

Executed on January 9, 2024 in Washington DC

TIMOTHY
HANSON Digitally signed by
TIMOTHY HANSON
Date: 2024.01.09
10:38:08 -05'00'