

1 ALDEN F. ABBOTT
 2 General Counsel
 3 JOSHUA S. MILLARD, *pro hac vice*
 4 jmillard@ftc.gov
 5 BRIAN M. WELKE, *pro hac vice*
 6 bwelke@ftc.gov
 7 FEDERAL TRADE COMMISSION
 8 600 Pennsylvania Ave., N.W., CC-9528
 9 Washington, D.C. 20580
 10 Tel: (202) 326-2454, -2897; Fax: (202) 326-3197
 11 BARBARA CHUN, Local Counsel, Cal. Bar. No. 186907
 12 bchun@ftc.gov
 13 FEDERAL TRADE COMMISSION
 14 10990 Wilshire Blvd., Suite 400
 15 Los Angeles, CA 90024
 16 Tel: (310) 824-4312; Fax: (310) 824-4380
 17 Attorneys for Plaintiff

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

20 FEDERAL TRADE COMMISSION,

21 Plaintiff,

22 v.

23 IMPETUS ENTERPRISE, INC., a
 24 California corporation, also d/b/a
 25 Aiding Student Relief, Aiding Students
 26 & Teachers, Aidnest, Avec Staffing,
 27 National Education Student and
 28 Teacher, Studora, and U.S. Debt Relief;
 FIG TREE & CO., LLC, a California
 limited liability company, also d/b/a
 Aiding Student Relief, Aiding Students

Case No. 8:18-cv-01987-JLS-KES

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

1 & Teacher, and Aiding Students &
2 Teachers; CAPITAL SUN
3 INVESTMENTS, LLC, a Wyoming
4 limited liability company, also d/b/a
5 Studora; TUAN DINH DUONG, a/k/a
6 Thomas Duong, a/k/a Thomas Dinh,
7 individually and as an officer of
8 IMPETUS ENTERPRISE, INC.;
9 BRENDA AVITIA-PENA, individually
10 and as an officer of IMPETUS
11 ENTEPRISE, INC. and FIG TREE &
12 CO., LLC; BRIAN COLOMBANA
13 d/b/a FUTERO, individually and as an
14 officer of FIG TREE & CO., LLC; and
15 JIMMY CALDERON, individually and
16 as an officer of CAPITAL SUN
17 INVESTMENTS, LLC,

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19 Defendants, and

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21 NOEL SOLUTIONS, LLC, a Wyoming
22 limited liability company;

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24 Relief Defendant.
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Plaintiff, the Federal Trade Commission (“FTC”), for its Complaint alleges:

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

1 their deceptive marketing and sale of student loan debt relief services.

2 **JURISDICTION AND VENUE**

3 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§
4 1331, 1337(a), and 1345, and 15 U.S.C. §§ 45(a), 53(b), 6102(c), and 6105(b).

5 3. Venue is proper in this district under 28 U.S.C. § 1391(b)(1), (b)(2),
6 (c)(1), (c)(2), (c)(3), and (d), and 15 U.S.C. § 53(b).

7 **PLAINTIFF**

8 4. The FTC is an independent agency of the United States Government
9 created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC
10 Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or
11 affecting commerce. The FTC also enforces the Telemarketing Act, 15 U.S.C. §§
12 6101-6108. Pursuant to the Telemarketing Act, the FTC promulgated and enforces
13 the TSR, 16 C.F.R. Part 310, which prohibits deceptive and abusive telemarketing
14 acts or practices in or affecting commerce.

15 5. The FTC is authorized to initiate federal district court proceedings, by
16 its own attorneys, to enjoin violations of the FTC Act and the TSR, and to secure
17 such equitable relief as may be appropriate in each case, including rescission or
18 reformation of contracts, restitution, the refund of monies paid, and the
19 disgorgement of ill-gotten monies. 15 U.S.C. §§ 53(b) and 6102(c).

20 **DEFENDANTS**

21 6. Defendant Impetus Enterprise, Inc. (“Impetus”), also doing business
22 as Aiding Student Relief, Aiding Students & Teachers, Aidnest, Avec Staffing,
23 National Education Student and Teacher, Studora, and U.S. Debt Relief, is a
24 California corporation with its principal place of business at 18100 Von Karman
25 Ave., Suite 850, Irvine, California 92612. Impetus transacts or has transacted
26 business in this district and throughout the United States. At all times material to
27 this Complaint, acting alone or in concert with others, or as part of the common
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1 enterprise described in paragraph 14, Impetus has advertised, marketed, offered to
2 provide, provided, offered for sale, or sold student loan debt relief services to
3 consumers throughout the United States.

4 7. Defendant Fig Tree & Co., LLC (“Fig Tree LLC”), also doing
5 business as Aiding Student Relief, Aiding Students & Teacher, and Aiding
6 Students & Teachers, is a California limited liability company with its principal
7 place of business at 18100 Von Karman Ave., Suite 850, Irvine, California 92612.
8 Fig Tree LLC transacts or has transacted business in this district and throughout
9 the United States. At all times material to this Complaint, acting alone or in
10 concert with others, or as part of the common enterprise described in paragraph 14,
11 Fig Tree LLC has advertised, marketed, offered to provide, provided, offered for
12 sale, or sold student loan debt relief services to consumers throughout the United
13 States.

14 8. Defendant Capital Sun Investments, LLC (“Capital Sun”), also doing
15 business as Studora, is a Wyoming limited liability company with its principal
16 place of business at 1651 East Fourth Street, Suite 124, Santa Ana, California
17 92701. Capital Sun transacts or has transacted business in this district and
18 throughout the United States. At times material to this Complaint, acting alone or
19 in concert with others, as part of the common enterprise described in paragraph 14,
20 or as a successor in interest to defendant Impetus, Capital Sun has advertised,
21 marketed, offered to provide, provided, offered for sale, or sold student loan debt
22 relief services to consumers throughout the United States.

23 9. Defendant Tuan Dinh Duong, also known as Thomas Duong and
24 Thomas Dinh (“Duong”), has identified himself as or served as the President,
25 director, general manager, sales manager, owner, co-owner, and principal
26 shareholder of Impetus. At all times material to this Complaint, acting alone or in
27 concert with others, he has formulated, directed, controlled, had the authority to
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1 control, or participated in the acts and practices set forth in this Complaint.
2 Defendant Duong resides in this district and, in connection with the matters alleged
3 herein, transacts or has transacted business in this district and throughout the
4 United States.

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

13 11. Defendant Brian Colombana (“Colombana”), who has also done
14 business under the fictitious business name “Futero,” has identified himself as or
15 served as co-owner of Impetus (and CIO of its d/b/a, Avec Staffing), and manager
16 of Fig Tree LLC. At times material to this Complaint, through at least January
17 2018, acting alone or in concert with others, Colombana formulated, directed,
18 controlled, had the authority to control, or participated in the acts and practices set
19 forth in this Complaint. Defendant Colombana resides in this district and, in
20 connection with the matters alleged herein, transacts or has transacted business in
21 this district and throughout the United States.

22 12. Defendant Jimmy Calderon (“Calderon”) has identified himself as and
23 has served as manager of Capital Sun. At times material to this Complaint, since at
24 least September 2017, acting alone or in concert with others, Calderon formulated,
25 directed, controlled, had the authority to control, or participated in the acts and
26 practices set forth in this Complaint. Defendant Calderon resides in this district
27 and, in connection with the matters alleged herein, transacts or has transacted
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1 business in this district and throughout the United States.

2 **RELIEF DEFENDANT**

3 13. Relief Defendant Noel Solutions, LLC (“Noel”) has received funds
4 that can be traced directly to Defendants’ deceptive acts or practices alleged below,
5 for which it has no legitimate claim. Noel is a Wyoming limited liability company
6 that reported in a public document that its principal place of business is 1623
7 Central Ave., Suite 201, Cheyenne, Wyoming 82001. Noel also incorporated as a
8 California limited liability company in January 2018, listing its address as 18997
9 Barroso St., Rowland Heights, California 91748. Noel transacts or has transacted
10 business in this district and in the district of Wyoming.

11 **COMMON ENTERPRISE**

12 14. Defendants Impetus, Fig Tree LLC, and Capital Sun (“Corporate
13 Defendants”) have operated as a common enterprise while engaging in the
14 unlawful acts and practices alleged below. Defendants have conducted the
15 business practices described below through interrelated companies that have
16 common ownership, officers, managers, business functions, employees, and office
17 locations, and routinely transfer funds amongst themselves. Because the Corporate
18 Defendants have operated as a common enterprise, each is jointly and severally
19 liable for the acts and practices alleged below. Defendants Duong, Avitia-Pena,
20 Colombana, and Calderon have formulated, directed, controlled, had the authority
21 to control, or participated in the acts and practices of the Corporate Defendants that
22 constitute the common enterprise.

23 **COMMERCE**

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

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DEFENDANTS’ UNLAWFUL STUDENT LOAN DEBT RELIEF
OPERATION

16. Since at least December 2014 through at least the filing of the FTC’s Complaint in this matter in November 2018, Defendants have operated an unlawful debt relief scheme that preys on consumers with student loan debt. In telephone calls, on websites, and in mailed advertising, Defendants promise to reduce consumers’ monthly student loan payments and eliminate all, or a portion of, their student loan debt through enrollment in student loan forgiveness or repayment programs. In many instances, however, Defendants failed to obtain debt forgiveness or monthly payment reductions. In fact, some consumers owed more on their student loans after enrolling in Defendants’ program.

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

Background on Student Loan Forgiveness and Repayment Programs

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

19. To address this mounting level of distressed debt, the U.S. Department of Education (“USDE”) and state government agencies administer a limited number of student loan forgiveness and discharge programs. Most consumers, however, do not qualify for these programs because of strict eligibility requirements. For example, one program requires the consumer to demonstrate a total and permanent disability; another applies only to consumers whose school closed while the consumer was still enrolled. A third program, the Borrower Defense to Repayment (“BDR”), may provide a loan discharge if the school, through an act or omission, violated state law directly related to the borrower’s

1 federal student loan or to the educational services for which the loan was provided.

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

9 21. The federal government also offers loan forgiveness through income-
10 driven repayment (“IDR”) programs that enable borrowers to reduce their monthly
11 payments and have portions of their loans forgiven. IDR programs allow eligible
12 borrowers to limit their monthly payments based on a percentage of their
13 discretionary monthly income. To remain in an IDR program, borrowers must
14 recertify their income and family size annually. Obtaining forgiveness through
15 IDR programs requires a minimum of 20 or 25 years of qualifying payments,
16 depending on whether borrowers received their first loans on July 1, 2014 or
17 before that date. Because a borrower’s income is likely to fluctuate over the life of
18 the loan, monthly payments under the IDR programs can vary considerably from
19 year to year. If a borrower’s income were to increase over the repayment period,
20 for example, the monthly payment amount could correspondingly increase to the
21 point where those payments would pay off the loan before any amount could be
22 forgiven at the end of the repayment term. No loans have been forgiven yet under
23 any of the IDR programs because the programs have not existed long enough for
24 borrowers to make the minimum number of years of qualifying payments.

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

2 23. USDE will grant forbearance while processing applications for an
3 alternative repayment plan, and in some cases of hardship. During forbearance,
4 unpaid interest is added to the principal balance.

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

6 24. To lure consumers into purchasing their purported student loan debt
7 relief services, Defendants have made false promises to eliminate or reduce
8 consumers’ student loan balances or monthly payments through loan forgiveness
9 or other programs.

10 25. To induce consumers to purchase their purported student loan debt
11 relief services, Defendants have disseminated websites such as aidingstudents.com,
12 aidnest.com, and studora.com, including, but not necessarily limited to, the
13 attached exhibits A through F. Defendants’ websites have contained the following
14 statements, among others:

15 Free Assessment	16 Service Guarantee	17 Success Rate
18 Our experts will assess 19 your current student loan 20 program, and determine 21 which programs are 22 available in your 23 situation. We will help 24 you decide which 25 program can help you 26 achieve your goals. Call 27 us today!	18 We are committed to 19 helping customers get 20 lower rates and monthly 21 payments, and we will 22 make the process 23 seamless and 24 straightforward. You will 25 be satisfied with our 26 service and our 27 commitment to your 28 success. That’s our guarantee.	18 Our 96% success rate is 19 one of the top ratings in 20 the industry. Our process 21 has been tested, and our 22 success rate proves that it 23 works. We can help you 24 reduce and simplify your 25 payments. Call us today!

26 Ex. A at 1 (aidingstudents.com, 2015).

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

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

5 **“Aiding Student Relief has helped countless people reduce their student**
6 **debt. Their proven business plan has led to one of the highest success rates in the**
7 **industry.”**

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9 Ex. A at 4.

10 **100% Customer Satisfaction**
11 We can help you reduce and simplify your payments. Call one of our specialists
12 today.

13 Ex. B at 1 (aidingstudents.com, 2016) (emphasis in original).

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

16 -----
17 **“Thanks to Aiding Student Relief, I am savings [sic] \$250 per month.”**
18 Michael Martin
19 Entrepreneur

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

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

22 Ex. C at 1 (aidingstudents.com, 2018) (emphasis in original).

Student Loan	Loan Forgiveness	Student Loan
Forgiveness		Forgiveness
If you have Federal Student Loans, you're in the right place to get those	Get your multiple Federal Student Loans consolidated into one,	We understand if you're going through some hardship, and that's why

1 loans reduced, forgiven or forget about increasing with us you'll be able to
2 completely discharged interests [sic] and pay make monthly payments
3 through our student loan month to month at the based on your
4 forgiveness programs. lowest possible cost. affordability, for as low as
\$0.00, depending on your
situation.

5 Ex. D at 2 (aidnest.com, 2016).

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

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

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

14 Ex. E at 6 (aidnest.com, 2018) (emphasis in original).

STUDENT LOAN FORGIVENESS	INCOME BASED PAYMENTS	LOAN CONSOLIDATION
We'll help you get your loans reduced, forgiven or discharged.	Make monthly payments based on your affordability.	Get multiple Federal Student Loans consolidated into one low monthly payment!

22 Ex. F at 1 (studora.com, 2018) (emphasis in original).

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

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1 27. In calls with consumers, Defendants’ telemarketers have told
2 consumers that Defendants can cause consumers’ student loan balances to be
3 reduced, or that consumers’ loan balances would be forgiven after making lower
4 monthly payments. Defendants’ telemarketers have told some consumers that over
5 half their loan balance would be forgiven. Moreover, Defendants’ telemarketers
6 have told some consumers that their loan payments could or would be rapidly
7 reduced to \$19 per month, or promptly forgiven.

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

19 29. Defendants have not been likely to achieve the lower monthly
20 payments or student loan forgiveness they have advertised, marketed, and
21 promoted to consumers. In many instances, Defendants have failed to obtain the
22 promised lower monthly payments or student loan forgiveness.

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

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1 31. Defendants' telemarketers have sought and obtained consumers'
2 payment information by phone or the Internet.

3 32. Defendants' total advance fees typically have been in the range of
4 \$300-500. Defendants also have charged consumers recurring monthly fees for
5 purported debt relief services, typically charging \$19 per month.

6 **THE FTC ACT**

7 33. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits "unfair or
8 deceptive acts or practices in or affecting commerce."

9 34. Misrepresentations or deceptive omissions of material fact constitute
10 deceptive acts or practices prohibited by Section 5(a) of the FTC Act.

11 **VIOLATIONS OF THE FTC ACT**

12 **Count One**

13 **(Deceptive Student Loan Debt Relief Representations)**

14 35. In numerous instances in connection with the advertising, marketing,
15 promotion, offering for sale, or sale of student loan debt relief services, Defendants
16 have represented, directly or indirectly, expressly or by implication, that consumers
17 who purchase Defendants' debt relief services will or likely will have their
18 monthly payments reduced or their loan balances forgiven in whole or in part.

19 36. In truth and in fact, in numerous instances in which Defendants have
20 made the representations set forth in Paragraph 35 of this Complaint, such
21 representations were false or not substantiated at the time Defendants made them.

22 37. Therefore, Defendants' representations as set forth in Paragraph 35 of
23 this Complaint are false or misleading and constitute deceptive acts or practices in
24 violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

25 **THE TELEMARKETING SALES RULE**

26 38. Congress directed the FTC to prescribe rules prohibiting abusive and
27 deceptive telemarketing acts or practices pursuant to the Telemarketing Act, 15
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1 U.S.C. §§ 6101-6108, in 1994. The FTC adopted the original TSR in 1995,
2 extensively amended it in 2003, and amended certain sections thereafter. 16
3 C.F.R. Part 310.

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

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

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

- 25 a. The seller or telemarketer has renegotiated, settled, reduced, or
26 otherwise altered the terms of at least one debt pursuant to a
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settlement agreement, debt management plan, or other such valid contractual agreement executed by the customer; and

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

c. To the extent that debts enrolled in a service are renegotiated, settled, reduced, or otherwise altered individually, the fee or consideration either:

i. Bears the same proportional relationship to the total fee for renegotiating, settling, reducing, or altering the terms of the entire debt balance as the individual debt amount bears to the entire debt amount. The individual debt amount and the entire debt amount are those owed at the time the debt was enrolled in the service; or

ii. Is a percentage of the amount saved as a result of the renegotiation, settlement, reduction, or alteration. The percentage charged cannot change from one individual debt to another. The amount saved is the difference between the amount owed at the time the debt was enrolled in the service and the amount actually paid to satisfy the debt. 16 C.F.R. § 310.4(a)(5)(i).

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

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

5 **VIOLATIONS OF THE TELEMARKETING SALES RULE**

6 **Count Two**

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

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

- 11 a. Defendants have renegotiated, settled, reduced, or otherwise
12 altered the terms of at least one debt pursuant to a settlement
13 agreement, debt management plan, or other such valid contractual
14 agreement executed by the customer; and
15 b. The customer has made at least one payment pursuant to that
16 settlement agreement, debt management plan, or other valid
17 contractual agreement between the customer and the creditor.

18 45. Defendants' acts or practices, as described in Paragraph 44 of this
19 Complaint, are abusive telemarketing acts or practices that violate Section
20 310.4(a)(5)(i) of the TSR, 16 C.F.R. § 310.4(a)(5)(i).

21 **Count Three**

22 **(Material Debt Relief Misrepresentations)**

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

2 47. Defendants' acts and practices, as described in Paragraph 46 of this
3 Complaint, are deceptive telemarketing acts or practices that violate Section
4 310.3(a)(2)(x) of the TSR, 16 C.F.R. § 310.3(a)(2)(x).

5 **Count Four**

6 **(Disgorgement of Ill-Gotten Gains of Relief Defendant)**

7 48. Relief Defendant Noel has received, directly or indirectly, funds or
8 other assets from Defendants that are traceable to funds obtained from Defendants'
9 customers through the unlawful acts or practices described herein.

10 49. Relief Defendant Noel has no legitimate claim to Defendants'
11 customers' funds or other assets and will be unjustly enriched if it is not required to
12 disgorge the assets or the value of benefits received as a result of Defendants'
13 unlawful acts or practices.

14 50. By reason of the foregoing, Relief Defendant Noel holds funds and
15 assets in constructive trust for the benefit of Defendants' customers.

16 **CONSUMER INJURY**

17 51. Consumers have suffered and will continue to suffer substantial injury
18 as a result of Defendants' violations of the FTC Act and the TSR. In addition,
19 Defendants have been unjustly enriched as a result of their unlawful acts or
20 practices. Absent injunctive relief by this Court, Defendants are likely to continue
21 to injure consumers, reap unjust enrichment, and harm the public interest.

22 **THIS COURT'S POWER TO GRANT RELIEF**

23 52. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court
24 to grant injunctive and such other relief as the Court may deem appropriate to halt
25 and redress violations of any provision of law enforced by the FTC. The Court, in
26 the exercise of its equitable jurisdiction, may award ancillary relief, including
27 rescission or reformation of contracts, restitution, the refund of monies paid, and
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1 the disgorgement of ill-gotten monies, to prevent and remedy any violation of any
2 provision of law enforced by the FTC.

3 53. 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
28


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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.

Dated: February 5, 2019

Respectfully submitted,

ALDEN F. ABBOTT
General Counsel



Joshua S. Millard
Brian M. Welke
Barbara Chun (Local Counsel)
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

YouTube

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!



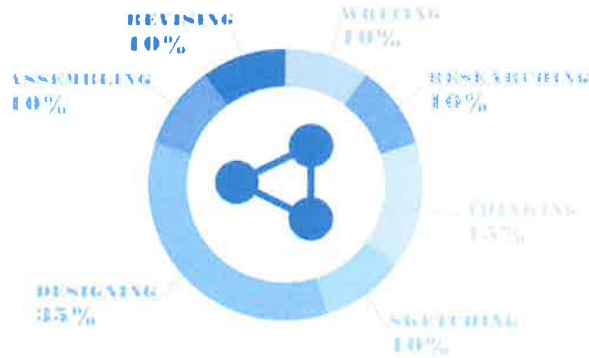
FTC-AID-1

Exhibit A
20

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



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.

FTC-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!





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!

FTC-AID-7

Exhibit A
26

EXHIBIT B

4/5/2018 u A NGSTU ENT REL EF | We can help yo red ce and simplify yo r payments. Call one of o r specialists today. (855) 6 A NG (624-3464)

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100% Customer Satisfaction u

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



Loan Forgiveness

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



Consolidating Your Loans

Consolidating your loans to one new loan under u 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 u Plans may be the correct choice for you.



Forbearance & Deferment

If you are still in school and struggling to make payments on your student u 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.

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Loan Forgiveness Programs

In some cases, individuals with Federal Student Loans may qualify to have a portion of the amount owed may be forgiven. [u](#)

Permanent Disability Forgiveness

If your disability is expected to last 60 months or more, you may qualify for permanent disability forgiveness. [u](#)

Income Base Payments

A period of nancial hardship may qualify you for an Income Based Repayment Plan. In many cases, this means you pay nothing. [u](#)

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. [u](#)

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. [u](#)

[READ MORE](#) [u](#)

Meet some of our members who have saved big on their student loan debt. [u](#)

Helping You **Save Big** [u](#)

"Thanks t Aidin St dent relief am sa in s 50 er month u



Michael Martin
Entre reneur u



If you have questions

We have **the answers** [u](#)



Outstanding Service Only [u](#)

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


(888) 457-0755

[CHECK ELIGIBILITY](#) [>u](#)


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STUDENT LOANS! u
Octo , 016 u



How a Change of City can Change your Life (and Loan)! u
August 23, 2016

info@aidingstudents.com

600 Anton Bl d Suite 11th Floor
Costa Mesa, CA 9 6 6

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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

Subscribe

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

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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](#)

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[12511110_111236751](#)

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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

18100 Von Karman Ave Suite 850 Irvine, CA 92612

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EXHIBIT E

AIDNEST Let us help you through this national crisis

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

AIDNEST Let us help you through this national crisis

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

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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](#)

AIDNEST Let us help you through this national crisis



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.

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Simple Process

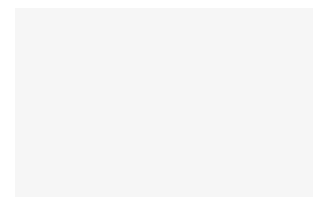
We understand that lowering your payments alone can be difficult. Our intuitive platform allows us to keep the entire process simple.

Customer Satisfaction

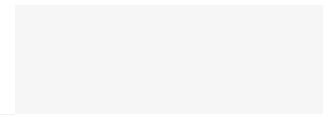
We are committed to providing you with outstanding service only. We look forward to working with you.

100% money back guarantee

No Hassle Money Back Policy



AIDNEST Let us help you through this national crisis



**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.

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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

855-580-NEST (6378)

18100 Von Karman Ave Suite 850,
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

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(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.

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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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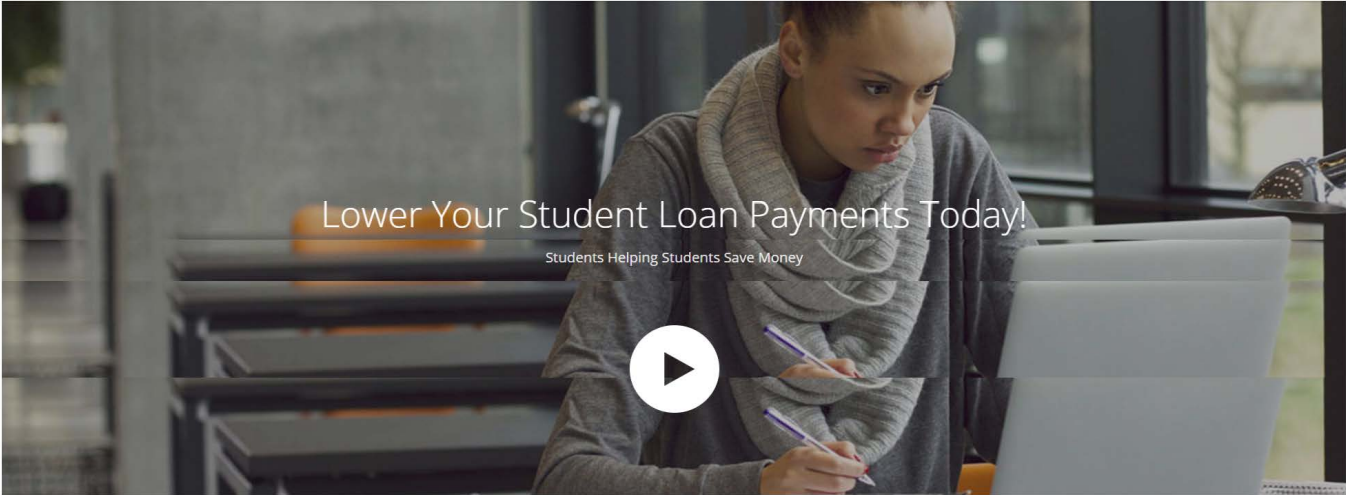
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Lower Your Student Loan Payments Today!

Students Helping Students Save Money

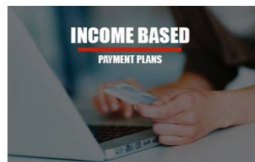


Offering obligation and commitment free loan relief solutions!



STUDENT LOAN FORGIVENESS

We'll help you get your loans reduced, forgiven or discharged.



INCOME BASED PAYMENTS

Make monthly pdyments based on your affordability.



LOAN CONSOLIDATION

Get multiple Federal Student Loans consolidated into one low monthly payment!

Talk to our experts concerning your student loans.

Studora is a privately owned company that helps consumers like you identify government programs that fit your financial situation. Our loan experts will assist you in selecting the appropriate programs that work with your income, family size, and desired monthly payment. We then prepare the appropriate documents for your review and submission. All this for one low easy payment.

[CONTACT US](#)



Testimonials



Paul

Thank you for getting back to me quickly, You've been fabulous during this whole process. Is there a place I can go online that I can leave a comment for your manager? You've made this process so easy and answered every question my husband and I have had.



Robert

Thank you for the confirmation, and for your help today. Pass this on to your sup. that you were very professional and very helpful and brought a sense of relief for me. Thank you very much and have a great rest of your day. Kudos to you and your team...moneywell spent.

Services we offer!

Studora offers document preparation services for all loan forgiveness, consolidation, and relief services to people who are unable to manage their finances. Our main aim is to offer complete peace of mind to individual unable to pay their student loan debt.

We offer the following document preparation services with complete professional assistance:

Financial Review

The first step to creating a flexible loan repayment plan is financial review. Our professionals will look into your finances and design a custom repayment plan that is affordable and easy to manage.

Budget Planning

We also help create a personal finance plan to ensure that you are able to manage your monthly budget in the most effective way. This plan will keep your spending to the minimum, allowing you to save more money for loan repayment.

Teacher Loan Forgiveness

Good news for teachers who are under the weight of a massive loan. You can now get \$17,500 forgiven on your student loans.

Permanent Disability Forgiveness

You can get rid of your Federal Student Loan if you are permanently disabled.



Public Service Loan Forgiveness

If you are a public service agent you can get rid of your loan after 120 days of payments.



Custom Debt Relief Plans

Want assistance with debt relief? Get in touch with our experts who will help design a loan repayment and relief plan for you based on your monthly income and affordability.



THERE ARE NO OBLIGATIONS OR COMMITMENTS.

Want to save thousands of dollars? Fill out our form and get relief from your student loan for a more peaceful tomorrow!

Your Name
E-Mail



OBAMA STUDENT LOAN FORGIVENESS

The name "Obama Student Loan Forgiveness" has become the nickname for a program actually called the William D. Ford Direct Loan program. Many people only know about the program, and have heard of it through others, as the Obama Student Loan Forgiveness program.

FROM THE BLOG

- Did You Know You Can Lower Your Student Loan >
- Co-Signing a Student Loan >
- Donald Trump on the Student Loan Crisis >

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