

Exhibit A

DECLARATION OF KRISTA L. FREITAG

PURSUANT TO 28 U.S.C. § 1746

I, KRISTA L. FREITAG, DECLARE AS FOLLOWS:

1. I have personal knowledge of the facts stated herein and, if called to testify, I could and would competently testify to the same.

2. I was appointed on April 13, 2018, as temporary receiver of American Home Servicing Center, LLC ("American Home"), Capital Home Advocacy Center ("Capital Home"), National Advocacy Center, LLC ("National Advocacy"), and any other entity that has conducted any business related to their mortgage assistance operation.

3. On April 16, 2018, I entered the business premises of Capital Home at 1809 East Dyer Road, Suite 301, Santa Ana, CA 92705. I took control of the company and interviewed the employees who were on site at the time.

4. I learned from my interviews with Capital Home employees that Capital Home uses National Data System's customer relations management web-based software called LeadTrac. I learned that the employees who purportedly work with lenders on behalf of customers are called "Senior Processors." I interviewed the Senior Processors and saw them print reports out of LeadTrac on April 16, 2018.

5. When I asked for a list of current active client files, Capital Home employees provided me with the senior processor pipeline report, which they ran and printed from LeadTrac. I am not aware of any process by which files were moved out of the senior processing report.

6. On April 16, 2018, I contacted National Data Systems, the company that provides the LeadTrac web-based software and requested that they provide me access to and create a backup of the Capital Home account as it existed on that date.

1 7. On April 17, 2018, pursuant to the Court's order, I provided
2 employees of the Federal Trade Commission with access to the Capital Home
3 LeadTrac account.

4 8. While I and my counsel were interviewing Capital Home employees, I
5 watched Defendant Eve Christine Rodriguez ("Christina Rodriguez") going
6 through mail that had arrived that day. I told her that she was not allowed to take
7 the mail and subsequently noticed that a check I had seen in one of the envelopes
8 had gone missing. Christina Rodriguez later contacted me to state she had the
9 check in her possession, and upon my demand to do so, she returned it to the
10 business premises.

11 9. Shortly after I arrived at the Capital Home offices on the morning of
12 April 16, 2017, I asked Christina Rodriguez about the whereabouts of Defendant
13 Sergio Rodriguez, who I believe is her son. She stated Mr. Rodriguez was not
14 there, but she was in communication with him via text and he was aware of the
15 TRO and that I was at the offices to take control of the companies. Mr. Rodriguez
16 never came to the offices on that day and has not responded to my attempts to
17 contact him via email. I later learned from Citibank that Mr. Rodriguez withdrew
18 at least \$15,500 from a Capital Home bank account shortly after I arrived at the
19 Capital Home offices on April 16, 2018. I also asked Christina Rodriguez for and
20 served numerous copies of the Court's order on vendors and others in an attempt to
21 locate the business operations of Capital Home and/or National Advocacy.

22 10. On April 19, 2018, I communicated with Marcus Fierro, Jr., via email
23 regarding the order entered by this Court, and specifically regarding American
24 Home and National Advocacy. He denied having possession of any records and
25 current involvement, and would only provide me a phone number for Jaime
26 Aburto, even though I asked for address information.

1 11. On April 20, 2018, I sent a copy of the Court's order via email to
2 several email addresses identified as "users" by Call Tracking Metrics, a National
3 Advocacy vendor which tracks online and offline channels generating calls to
4 businesses. One of the email recipients provided me with address information for
5 National Advocacy's physical location, which is 15991 Red Hill Avenue, Suite
6 204, Tustin, California 92780. I entered National Advocacy's business premises
7 the same day. No one was at the office when I entered, but it was apparent that the
8 business had been operating as recently as April 19, 2018, and that the employees
9 had suddenly abandoned the office.

10 I DECLARE UNDER PENALTY OF PERJURY THAT THE
11 FOREGOING IS TRUE AND CORRECT. EXECUTED ON THIS 20th DAY OF
12 APRIL, 2018.

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Krista L. Freitag