

Exhibit 1

From Article at GetOutOfDebt.org

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Attorneys for Plaintiff
Consumer Financial Protection Bureau

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

Consumer Financial Protection Bureau,

Plaintiff,

v.

Morgan Drexen, Inc.,
and
Walter Ledda, individually, and as
owner, officer, or manager of Morgan
Drexen, Inc.,
Defendants.

Case No. SACV13-01267 JLS (JEMx)

**DECLARATION OF R. GABRIEL D.
O'MALLEY IN SUPPORT OF
PLAINTIFF'S EX PARTE APPLICATION**

HON. JOSEPHINE L. STATON

Courtroom 10-A (Santa Ana)

DECLARATION OF R. GABRIEL D. O'MALLEY

1
2 1. I am an Enforcement Attorney at the Consumer Financial Protection
3 Bureau ("Bureau") and am counsel for the Plaintiff in this matter.

4 2. I submit this Declaration in support of the Bureau's Reply in Support
5 of its *Ex Parte* Application for an Order Holding Vincent Howard, Howard Law,
6 PC, Williamson & Howard, LLP, Aissac Aiono, and Seila Law, LLC in Contempt
7 and Imposing Monetary Sanctions.

8 3. Attached as Exhibit A to this Declaration is a true and correct copy of
9 the declaration of Hugh Williams.

10
11 Executed this 9th day of March, 2016, at Washington, D.C.

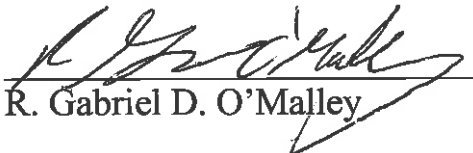
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14 R. Gabriel D. O'Malley
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EXHIBIT A

From Article at GetOutOfDebt.org

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Case No. SACV13-01267 JLS (JEMx)

Declaration of Hugh Williams

1 7. Howard Law also had access to the bank accounts of the consumers for
2 whom I was engagement counsel. Each month, Howard Law would withdraw funds
3 from the consumers' accounts via Automated Clearing House ("ACH") and deposit
4 these funds into the bank account it opened in my name.

5 8. The consumers' payments were the only funds transferred into the bank
6 account Howard Law opened in my name.

7 9. For each consumer for whom I acted as engagement counsel, each month
8 Howard Law would pay itself at least \$50 from the bank account it had opened in my
9 name. Thus, for the roughly 100 consumers for whom I acted as engagement counsel,
10 Howard Law deducted at least \$5,000 per month from the bank account it opened in my
11 name.

12 10. In November 2015, I reviewed the bank account Howard Law opened in my
13 name for the first time since before October 2015. At that time, I saw that Howard Law
14 had continued to: (1) make ACH debits from the accounts of consumers for whom I was
15 engagement counsel and deposit that money into the bank account it had opened in my
16 name; and (2) pay itself at least \$50 per month out of the account it had opened in my
17 name for each of the approximately 100 consumers for whom I acted as engagement
18 counsel.

19 11. Based on my review of the bank account and correspondence from Howard
20 Law, I am aware that Howard Law continued to: (1) make ACH debits from the
21 accounts of consumers for whom I was engagement counsel and deposit that money into
22 the bank account it had opened in my name until January 2016; and (2) pay itself a
23 minimum of \$50 per month out of the account it had opened in my name for each
24 consumer for whom I acted as engagement counsel until January 2016.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed
2 on March 9, 2016.

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5 Hugh Williams

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