

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

AMERICAN CONSUMER CREDIT  
COUNSELING, INC.

Plaintiff,

v.

AMERICAN CONSUMER CREDIT,  
LLC.

Defendant.

Civil Action No. 16-12170

DECLARATION OF ALLEN AMADIN

I, Allen Amadin, make this Declaration on the basis of personal knowledge and under penalty of perjury.

1. I am employed as a supervisor at American Consumer Credit Counseling, Inc. (“ACCC”). Part of my duties includes overseeing ACCC’s call center where employees receive calls from consumers who need credit counseling services.

2. To ensure customer satisfaction ACCC records all calls made to its call center. The recording, along with other call information, is stored in an electronic database to which I have access. The additional information captured with the audio recording includes the following: (1) the date and time of the call; (2) the duration of the call; (3) the number that the caller is calling from; and (4) the Contact ID that the system assigns the call. The audio file of the call is saved with the Contact ID as the first seven digits of the file name for easy identification.

From Article at GetOutOfDebt.org

3. On July 18, 2017 at 10:31 am, an ACCC employee whom I supervise, Cleddy Rodriguez, received a phone call from phone number 386-547-5322 that lasted twenty three seconds. During the call the caller, who did not identify himself, told Mr. Rodriguez to deliver a threatening message to ACCC President Steve Trumble. Concerned, Mr. Rodriguez and his immediate supervisor brought the call to my attention.

4. The call was recorded and logged as described above. I have listened to the recording.

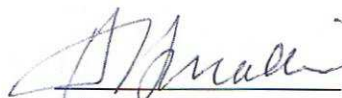
5. Attached hereto as Exhibit A is a true and correct transcript of the recording.

6. Attached hereto as Exhibit B is a true and correct screen shot of the ACCC database management program showing the logged information associated with the recording transcribed in Exhibit A.

7. Attached hereto as Exhibit C is a true and correct screen shot of the electronic audio recording file showing the first seven digits of the file name correspond to the Contact ID (2803712) of the highlighted record from the ACCC database.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 20, 2017

  
Allen Amadin

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on July 28, 2017 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule 5.2(b).

/s/ Jonathan R. DeBlois

Jonathan R. DeBlois

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