

DECLARATION OF KELLE A. SLAUGHTER
PURSUANT TO 28 U.S.C. § 1746

I, Kelle A. Slaughter hereby declare as follows:

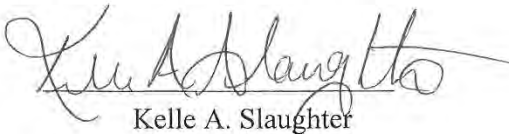
1. My name is Kelle A. Slaughter. I am a United States citizen and over eighteen years of age. I am employed as an investigator with the Federal Trade Commission (“FTC” or “Commission”), a position that I have held for approximately 5 months. My office address is 1999 Bryan St # 2150, Dallas, Texas 75201. I have personal knowledge of the facts stated in this declaration, and if called as a witness, I would testify to the same.

2. In the course of my employment, I participated in the FTC’s investigation of Simple Health Plans LLC, Health Benefits One LLC, Health Center Management LLC, Innovative Customer Care LLC, Simple Insurance Leads LLC, Senior Benefits One LLC, and Steven J. Dorfman (collectively, “Defendants”). My primary responsibility in this investigation was to visit the Defendants’ business location in Dallas, Texas.

3. On August 17, 2018, at 10:35am, I arrived at 5720 Lyndon B. Johnson, Dallas, Texas. Based on job postings the Defendants had placed on Craigslist, FTC staff had determined that Defendants were operating out of suite 610 in the building. Once inside the building, I took the elevator upstairs to the 6th floor. I exited the elevator observing a large business suite enclosed in glass to my right, a hallway across the 6th floor lobby in front of me and a hallway just to my left. I turned down the hallway to the left of the elevator. On the left side of the hallway, I observed and photographed a sign for Suite 610, which displayed the name “Simple Health.” A true and accurate copy of that photo is attached hereto as **Slaughter Exhibit A**. During the time that I was on the 6th floor, I saw two individuals enter suite 610.

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

Executed on October 21, 2018.


Kelle A. Slaughter

