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10 Attorneys for Defendant
11 ALLEVIATE TAX, LLC

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA

14 FARBOD HADIZADEH MOGHADAM
15 AND NIGEL LUCOMBE, individually
and on behalf of themselves and others
similarly situated,

16 Plaintiffs,

17 VS.

18 ALLEVIATE TAX, LLC

19 Defendant.

Case No. 8:24-cv-01810

**DECLARATION OF GEORGE
BASELUOS IN SUPPORT OF
DEFENDANT ALLEVIATE TAX,
LLC’S MOTION TO COMPEL
ARBITRATION**

Date: January 24, 2025

Time: 1:30 p.m.

Courtroom: 6A

Hon. Judge Michelle Williams Court

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24 I, George Baseluos, declare:

25 1. I am over the age of eighteen (18) years. I submit this declaration in
26 support of Defendant Alleviate Tax, LLC’s (hereinafter “Alleviate”) Motion to
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1 Compel Arbitration. The matters set forth below are based upon my personal
2 knowledge and, if called to testify as a witness, I could and would competently
3 testify thereto.

4
5 2. I am the CEO and founder of Alleviate Tax, LLC.

6 3. Alleviate contracts with third party marketing companies to generate
7 “leads” for Alleviate’s services. One of these third party marketing companies is
8 PrintWave Connect LLC (“PrintWave”).

9
10 4. PrintWave owns and operates the website
11 <https://taxreliefwarehouse.online/> (the “Website”). The Website is an online
12 marketplace for consumers seeking tax relief services information.

13
14 5. I have seen the Website and agreed to enter into an agreement with
15 PrintWave so they could generate leads for Alleviate through the Website. A true
16 and correct copy of said agreement between Alleviate and PrintWave is attached
17 hereto as **Exhibit A**.

18
19 6. Alleviate supplied the disclosure language to PrintWave to include on
20 the Website. A true and correct copy of a substantially similar version of the Website
21 and disclosure is attached hereto as **Exhibit B**.

22
23 7. As shown on Exhibit B, every user that submitted his information on
24 the Website, had to provide his “written consent” to be contacted “using an
25 automated telephone dialing system, text messages, pre-recorded messages, A.I.
26 generative voice, artificial voice messages and/or ringless voicemails...”
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1 8. I have also seen the Terms and Conditions, containing an arbitration
2 provision, located on the Website. A true and accurate copy of a substantially similar
3 version of the Website’s Terms and Conditions is attached hereto as **Exhibit C**.

4
5 9. As the CEO, I am familiar with Alleviate’s operational relationship
6 with third party providers, including PrintWave. PrintWave does not send Alleviate
7 any information regarding any leads unless the user clicks “Get Quote Now!” and
8 clicks the unchecked check box. Alleviate would not accept any such information,
9 or compensate PrintWave for that information, unless the user clicked the “Get
10 Quote” button, thus consenting to Alleviate’s terms.

11
12 10. Alleviate maintains various databases which include electronic
13 versions of records kept in the regular course of business. By virtue of my position,
14 I have access to these databases. The databases housing the documents noted below
15 I have access to these databases. The databases housing the documents noted below
16 have been accessed to obtain those records. I have reviewed these records and can
17 testify regarding their contents. The records housed in these databases are created at
18 or near the time of the events reflected therein in the ordinary course of Alleviate’s
19 business and are relied upon by Alleviate in its day-to-day operations.

20
21 11. I have reviewed Alleviate’s records related to Plaintiff Nigel Lucombe.
22 These records show that Alleviate received contract information, including phone
23 number for a user named “Nigel Lucombe” on February 26, 2024 through
24 submissions made on the Website. The only way Alleviate would have obtained this
25 information is if Nigel Lucombe (or someone acting or purporting to act on his
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1 behalf) entered that information on the Website and submitted it by clicking the “Get
2 Quote Now!” button on the Website.

3
4
5 I declare under penalty of perjury under the laws of the United States of
6 America that the foregoing is true and correct.

7 Executed on this 4____ day of November 2024 in Irvine_____,

8 CA
9 _____.

10 DocuSigned by:

11 *George Baseluos*

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13 _____
14 George Baseluos
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CERTIFICATE OF SERVICE

I hereby certify that on December 27, 2024, a copy of the foregoing was served by ECF to counsel of record.

/s/ Brittany A. Andres
Brittany A. Andres

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