

Dear Enforcement Director,

This is a petition to set aside Next Generation Debt Settlement, Inc. ("Company")'s Civil Investigative Demand ("CID").

Company is petitioning the CFPB to set aside this CID for the following reasons:

1. Company has never ever done any direct to consumer marketing, telemarketing, telesales, or sales activities in the entire USA.
2. Company has never ever generated, purchased, managed, sold to, or resold consumer leads.
3. Company had conducted business through affiliates providing them back-end product development and product service.
4. Company had every affiliate sign a contract pledging to never ever violate any state or federal laws or policies.
5. Due to negative debt settlement industry publicity, industry recession, and Company failure to sustain its business operations through profits, capital investments, or loans, Company has ceased to accept any new business from affiliates starting in November of 2011.
6. At present, Company has negative assets (debt) and no resources to respond rapidly to any inquiries.
7. Since December of 2011 and except for a skeleton outsourced Filipino customer service help, Company has closed its office and had no employees, accountants, attorneys, independent contractors, or any other human resources.
8. Company had sold through affiliates between the 4th quarter 2010 and 4th quarter 2011 four products. Only one product, named "Debt Restructure", was a financial product. The other three products were non-financial internet based subscription services to help debtors fight back debt collection harassment and threats. Here are more product details:
  - "Debt Restructure" financial product: This product was sold with strict FTC guidelines.
    1. No upfront fees whatsoever were charged for "Debt Restructure."
    2. All fees were contingent upon success.
    3. Fees were commissions that ranged from 15% to 18% of book value of negotiated debt.
    4. All customers were setup with independent trust accounts through Noteworld and customers had full control over their trust accounts.
    5. Full disclosures were made to and signed by every customer.
    6. Copies of all contracts signed were kept.
  - "Fight Harassment" non-financial internet subscription products: These products educated consumers on their rights and helped them fight back debt collection harassment and FDCPA violations, answer summons, allowed them to automatically generate cease and desist letters, and gave them full online access to update and use their debt information and submit debt harassment help tickets. These products were supported with a minimum of ten days and maximum of 45 days rescission periods in which the

customers didn't have to make any payments; full refunds were made in the first 30 days following the first payment; and additional refunds were allowed up to six months.

9. Company is ready to provide any documentation required by the CFPB to support above statements.

Sincerely,

Hassan Kassir, CEO

c: [REDACTED]

o: (949) 391-6291

f: (949) 313-1838