### UNITED STATES OF AMERICA BEFORE THE CONSUMER FINANCIAL PROTECTION BUREAU

# IN THE MATTER OF ENOVA INTERNATIONAL, INC.

## DECLARATION OF GAURAV DEVASTHALI IN SUPPORT OF ENOVA INTERNATIONAL INC.'S PETITION TO MODIFY THE CIVIL INVESTIGATIVE DEMAND

I, Gaurav Devasthali, under the penalties of perjury, hereby state as follows:

1. I am currently employed by NC Financial Solutions, LLC, an indirect subsidiary of Enova International, Inc., as the NetCredit Line of Credit Manager of Business. I have been employed in my current position since April 2021, and have been employed by Enova since July 2015. I previously served as Strategy & Operations Manager for CashNetUSA from October 2018 until April 2021.

2. Part of my current responsibilities include managing the line of credit business for NetCredit, including driving growth, creating and executing the strategic plan for the team, and addressing any areas of concern while delivering the best product and services to customers. Through both my current and previous positions at Enova I have developed an understanding of the products offered by different Enova entities and the different procedures, systems, and technologies that that those entities use.

3. I make this Declaration based upon my personal knowledge and experience, as well as upon information provided to me by other Enova personnel working under my direction and supervision.

4. Enova has over one hundred direct and indirect subsidiaries. Those subsidiaries offer a number of different products and services, including loans to Brazilian consumers, money transfer services, payday loans to consumers in the United States, near-prime loans to consumers in the Unites States, small business loans, and analytics and decision management tools to businesses, among other products and services.

#### **CashNetUSA and NetCredit Offer Different Products**

5. CashNetUSA is a business name for a group of Enova subsidiaries that offers payday loans and other sub-prime financial products to consumers under the CashNetUSA

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brand. NetCredit is a business name for a group of Enova subsidiaries that offers near-prime financial products to consumers, including personal loans and lines of credit, under the NetCredit brand. CashNetUSA and NetCredit are the only Enova brands that offer consumer credit products to consumers in the United States.

6. CashNetUSA offers loan extensions on its payday loan products in certain states. NetCredit does not offer payday loan products and does not offer loan extensions.

## CashNetUSA and NetCredit Have Different Personnel

7. CashNetUSA and NetCredit have separate corporate management teams, strategy and operations teams, product management teams, technology teams, and call center representatives.

8.	
9.	

**CashNetUSA and NetCredit Have Different Procedures** 

## CashNetUSA and NetCredit Use Different Technology Systems and Platforms

10. CashNetUSA and NetCredit use different technology platforms and systems to

service the products they offer to consumers.

11.	
12.	
13.	
14.	
15.	

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

Dated: June 14, 2021

Gaurav Devasthali