EXHIBIT 7

FILED PROVISIONALLY UNDER SEAL WITH REDACTIONS PURSUANT TO STIPULATED PROTECTIVE ORDER

JAMES W. MCGARRY (pro hac vice)
JMcGarry@goodwinlaw.com
GOODWIN PROCTER LLP
100 Northern Avenue
Boston, MA 02210
Tel.: +1 617 570 1000
Fax: +1 617 523 1231

SABRINA M. ROSE-SMITH (pro hac vice)
SRoseSmith@goodwinlaw.com
MATTHEW L. RIFFEE (pro hac vice)
MRiffee@goodwinlaw.com
GOODWIN PROCTER LLP
1900 N Street, NW
Washington, DC 20036
Tel.: +1 202 346 4000
Fax: +1 202 346 4444

Attorneys for Defendant
BANK OF AMERICA, N.A.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

SAN DIEGO DIVISION

IN RE: BANK OF AMERICA CALIFORNIA UNEMPLOYMENT BENEFITS LITIGATION	Case No. 3:21-MD-02992-GPC-MSB **DECLARATION OF WILLIAM M. MARTIN IN SUPPORT OF DEFENDANT'S MEMORANDUM IN OPPOSITION TO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION** Date: January 17, 2025 Time: 1:30 p.m. Ctrm: 2D – 2nd Floor Judge: Hon. Gonzalo P. Curiel FILED PROVISIONALLY UNDER SEAL PURSUANT TO STIPULATED PROTECTIVE ORDER

I, William M. Martin, hereby declare as follows:

1. I am employed by Bank of America, N.A. ("BANA") as Senior Vice President of Fraud Operations and a Prepaid Fraud Operations Executive. I make this declaration based upon personal knowledge and belief, upon BANA's records maintained in the ordinary course and scope of business, and upon information gathered from other Bank employees. If called to testify as to any of the matters set forth in this declaration, I could and would competently testify thereto

2. In my capacity as Program Management Executive in Prepaid Unemployment, and in my prior role as Senior Fraud Policy Manager in Prepaid Unemployment, my responsibilities include leading the prepaid fraud operations team, analyzing fraud associated with unauthorized transaction claims, and identifying characteristics of those claims in order to detect and prevent future fraud. In my current role, I also function as the Head of the Prepaid Fraud Operations team. In the past, I was also responsible for commercial, prepaid, and treasury fraud operations, which included similar responsibilities but for commercial and treasury products in addition to prepaid.

3. In my current and prior roles, I have been directly and personally involved in the development and implementation of BANA's fraud detection capabilities and efforts, including its use of anti-fraud strategies in State unemployment insurance ("UI") programs, including California's Employment Development Department ("EDD") UI program. Specifically, I am familiar with the level of authentication EDD cardholders had to provide to unblock cards that were blocked as a result of suspected fraudulent activity, as well as BANA's decision to block, rather than freeze, EDD prepaid cards suspected of fraudulent activity. I am also familiar with certain aspects of BANA's implementation of the regulators' consent orders and the Remediation Plans and Addenda in connection with BANA's

EDD UI program related to the investigation of potential fraud or mistaken unauthorized transaction claims by EDD cardholders.

BANA's Use of the Fraud Filter to Freeze, and Later Block, Certain Accounts

4. As a reasonable control to help keep BANA from being used as a means of fraud, BANA has historically used and continues to use tactics to either "block" or "freeze" a card when fraudulent activity is suspected through its fraud detection strategies. Both "blocks" and "freezes" are used to prevent account takeover or other illegal activity. [redacted]

5. When BANA first implemented the fraud detection strategy referred to as the "Fraud Filter," [redacted].

6. By early 2021, however, it became clear to BANA that EDD was not able to respond to the influx of cardholders seeking assistance with their accounts, [redacted]

[redacted].

7. Cardholders with blocked accounts could regain access to their accounts by [redacted].

The Additional Fraud Review Process

8. In connection with implementing the Remediation Plan, [redacted]

[redacted] The Prepaid Fraud Operations team, of which I am Head, is responsible for this additional fraud review process.

9. [redacted]

10. [redacted]

11. [redacted]

[redacted]

12. [redacted]

13. [redacted].

14. Based on my experience with BANA's additional fraud review process to date, and my broader knowledge of the extent of fraud that infiltrated the EDD prepaid card program during the COVID-19 pandemic, [redacted]

15. Our additional fraud review process is ongoing. BANA expects to continue the process through the end of the year.

Additional Fraud Review Examples

16. The following cardholders were or are currently subject to the additional fraud review process conducted by Prepaid Fraud Operations.

17. **Cardholder R.R.S.** – Attached to the AOE as **Exhibit 58** [redacted]

[redacted].

[redacted]

18. **Cardholder D.D.D.** – Attached to the AOE as **Exhibit 59** [redacted]

[redacted]

19. **Cardholder M.M.G.** – Attached to the AOE as **Exhibit 60** [redacted]

20. **Cardholder Y.L.** – Attached to the AOE as **Exhibit 61** [redacted] [redacted]

[redacted]

21. **Cardholder K.L.S.** – Attached to the AOE as **Exhibit 62** [redacted]

[redacted]

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

Executed on this 23rd day of October, 2024.

By: WMM

WILLIAM M. MARTIN