

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ALICIA MARSHALL, DANIEL
PRONSKY, PARIS TOWNSEND,
NANCILEE HOLLAND, LEONA
OWSLEY, KOLAWOLE AHMADOU,
KIANA DERVIN, KRISTINA
HENDERSON, DUSTIN INNIS, KELLY
STALNAKER and JAMIE JONES,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

PRESTAMOS CDFI, LLC and
CHICANOS POR LA CAUSA, INC.,

Defendants.

Case No. 5:21-cv-04337-JMG

DECLARATION OF QING CHEN

QING CHEN states as follows under penalty of perjury and pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and a resident of the United States. I make the following statements on personal knowledge, and on information that I acquired in the regular course of performing my business duties. I submit this declaration in support of Defendant Chicanos Por La Causa, Inc.'s ("CPLC") Renewed Motion to Dismiss Plaintiffs' Second Amended Complaint.

2. I presently hold the position of Controller for CPLC.

3. Pursuant to the Intercompany Services Agreement between CPLC and Prestamos, I perform various accounting functions for Prestamos.

4. CPLC and Prestamos maintain separate bank accounts.

5. CPLC and Prestamos have separate general ledger accounts and record their respective financial transactions in separate general ledger accounts.

6. Attached as **Exhibit 1** is a true and correct copy of all intercompany transfers from Prestamos to CPLC for the period commencing July 2019 and concluding June 2022.

7. Attached as **Exhibit 2** is a true and correct copy of all intercompany transfers from CPLC to Prestamos for the period commencing July 2019 and concluding June 2022.

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

Dated: 10/13/2023 | 8:57 AM PDT

DocuSigned by:

706B9BA8DA8B499...
Qing Chen

EXHIBIT 1

(FILED UNDER SEAL)

EXHIBIT 2

(FILED UNDER SEAL)