

**United States District Court
Southern District of Florida**

Date of Service: August 27, 2014

Federal Trade Commission, Plaintiff

Vs.

Partners In Health Care Association, et al., Defendants

And RBS Citizens Bank, N. A., Trustee

C. A. File No.: 14-23109

ANSWER OF TRUSTEE

RBS Citizens Bank, N. A. summoned as trustee for the defendant, makes answer that at the time of this service of the summons upon trustee it had in its possession goods, effects and credits in the amounts as follows:

The Trustee, RBS Citizens Bank, N. A., states that it maintains no deposit accounts in the names of the defendants, Partners In Health Care Association, Inc.; Gary L. Kieper; United Solutions Group, Inc DBA Debt Relief Experts; Constanza Gomez Vargas and/or Walter Steven Vargas. Accordingly, no funds have been restrained subject to this Temporary Restraining Order.

On behalf of RBS Citizens Bank, N. A., I have prepared the foregoing answer with the assistance of agents, employees and representatives of the Bank who ordinarily work on such records matters and are believed to have relevant and correct information and records upon which this answer is based. Accordingly such answer, as set forth herein, is true to the best of my knowledge, information, and belief.

Signed under oath this 28th day of August, 2014

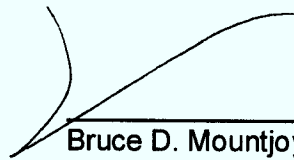
RBS Citizens Bank, N. A.

By: _____

Bruce D. Mountjoy
Operations Clerk
Phone: 888-999-6884

CERTIFICATION

I hereby certify that on August 28, 2014 I mailed a copy of the within answer to the plaintiff's attorneys, Gary Ivens and Christopher Brown



Bruce D. Mountjoy

Gary Ivens
Christopher Brown
Federal Trade Commission
600 Pennsylvania Avenue NW
Mail Stop CC-8528
Washington, DC 20580

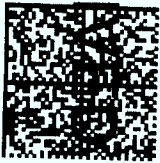
Citizens Bank


Operations Services
PW2140
525 William Penn Place
Pittsburgh, PA 15219

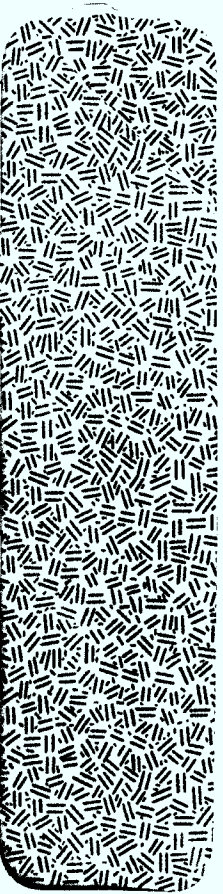
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