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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 14-23109

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

UNITED SOLUTIONS GROUP INC.
(also d/b/a Debt Relief Experts, Inc.),
WALTER S. VARGAS (individually and as an
officer or director of United Solutions Group Inc.),
CONSTANZA GOMEZ VARGAS (individually
and as a director or manager of United
Solutions Group Inc.),

Defendants.

AFFIDAVIT OF JAIME VARGAS

JAIME VARGAS, having come before the undersigned authority, and being duly sworn, states, deposes and says:

1. My name is JAIME VARGAS and I am the marketing director of BANESTRAL GROUP USA INC. (hereinafter BANESTRAL) and WALTER S. VARGAS' father. I do not work for UNITED SOLUTIONS, nor does any employee of BANESTRAL.
2. I have personal knowledge of the facts stated in this Affidavit and if called as a witness before this Honorable Court, my testimony regarding these facts would be the same as stated in this Affidavit. Accordingly, the facts stated herein are true and correct based upon my own personal knowledge.
3. On August 27, 2014, the Plaintiff, FEDERAL TRADE COMMISSION ("FTC"), executed and delivered a "Temporary Restraining Order" (the "TRO") and the

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"Complaint for Permanent Injunction and other Equitable Relief" to the WALTER VARGAS AND CONSTANZA GOMEZ at our offices located at 28 West Flagler Street suite 900 Miami, Florida 33130.

4. The office located at 28 West Flagler Street, Suite 900, Miami Florida lease is solely under BANESTRAL GROUP USA INC.

5. BANESTRAL GROUP USA INC., formally known as WORLD PARCEL SERVICES, is a privately owned travel company with headquarters located at 28 West Flagler Street, suite 900, Miami Florida. BANESTRAL travel company services clients throughout Latin America, primarily in Colombia and Peru. [See Composite Exhibit A].

6. BANESTRAL has representatives on-site in both Columbia and Peru, who operate strictly on the BANESTRAL server that is located and controlled from the West Flagler Street office.

7. BANESTRAL has twenty (20) employees, none of whom work for UNITED SOLUTIONS nor CONSTANZA GOMEZ, and BANESTRAL employees are paid exclusively from a BANESTRAL account.

8. On or about September 27, 2010, my ex-wife CONSTANZA GOMEZ and I got divorced. Shortly after the divorce CONSTANZA GOMEZ, with the help of my son WALTER VARGAS, opened UNITED SOLUTIONS to help his mother solely with payroll.

9. WALTER VARGAS helped CONSTANZA GOMEZ open UNITED SOLUTIONS by opening the corporation and business account. However, WALTER VARGAS has never worked for UNITED SOLUTIONS, is not an employee of UNITED SOLUTIONS and is not paid by UNITED SOLUTIONS. WALTER VARGAS is paid exclusively by BANESTRAL. [See Composite Exhibit B].

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10. In order to help CONSTANZA GOMEZ have financial independence after the divorce, BANESTRAL gave her a small space within the BANESTRAL Miami office, to operate UNITED SOLUTIONS. CONSTANZA GOMEZ has never worked for BANESTRAL. [See Composite Exhibit C].

11. At no time have any funds from BANESTRAL and UNITED SOLUTIONS ever been comingled. Additionally, BANESTRAL Directors and Managers are kept completely separate from UNITED SOLUTIONS. [See Composite Exhibit D].

12. BANESTRAL employees work in an area that is completely separate from that of UNITED SOLUTIONS. BANESTRAL employees only deal with travel and vacation sales and do not sell or represent anything for UNITED SOLUTIONS. BANESTRAL is a completely different entity than that of UNITED SOLUTIONS.

13. In addition to the above assertions, there is no inter-company relationship between BANESTRAL and UNITED SOLUTIONS. Neither company is a subsidiary of the other or any other entity. BANESTRAL does not possess any ownership interest, direct or indirect, in UNITED SOLUTIONS and UNITED SOLUTIONS does not possess any ownership interest, direct or indirect, in BANESTRAL.

14. Since to the TRO and the Complaint for Permanent Injunction and other Equitable Relief was served on August 27, 2014, BANESTRAL has been completely shut down and unable to operate.

15. The harm caused by the TRO is immediate for travelers who have booked through BANESTRAL and are stranded in Latin America without access to their accommodations and travel arrangements. No BANESTRAL client has been able to communicate with BANESTRAL employees to inquire about their travel plans.

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16. In addition, the TRO and Complaint for Permanent Injunction and other Equitable Relief could be jeopardizing local economies where hotels with which BANESTRAL has contracts with, are unable to find out what guests should check in. Additionally, hotels may not receive clients as some are waiting for payments for this week's guests.

17. Because BANESTRAL'S account was frozen, none of the 20 employees were paid today, August 29, 2014.

[VERIFICATION ON FOLLOWING PAGE
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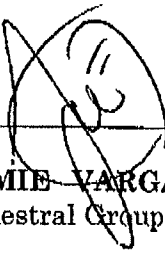
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VERIFICATION BY JAMIE VARGAS

Under penalties of perjury, I declare that I have read the above Affidavit and foregoing and that the facts stated herein are true to the best of my personal knowledge and belief.

**JAMIE VARGAS
BANESTRAL GROUP U.S.A., INC.**


By:  _____

JAMIE VARGAS, Marketing Director of
Banestral Group U.S.A., Inc.

STATE OF FLORIDA)
COUNTY OF MIAMI-DADE)

The foregoing Affidavit was acknowledged before me this 29 day of August, 2014, by Jamie Vargas, as Marketing Director of Banestral Group U.S.A., Inc., who is personally known to me or has produced the following identification:

FLORIDA DRIVERS LLC



Notary Public, State of Florida
My Commission Expires: 2/16/2015

