

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 14- 23109-CIV-SCOLA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

PARTNERS IN HEALTH CARE  
ASSOCIATION, INC. (also d/b/a/ Partners  
In Health Care, Inc.),

GARY L. KIEPER (individually and as officer  
or director of Partners In Health Care  
Association, Inc.),

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.

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**NOTICE OF FILING DECLARATION OF GARY L. KIEPER**

Defendants, PARTNERS IN HEALTH CARE ASSOCIATION, INC. and GARY L. KIEPER, through undersigned counsel, hereby file the Declaration of Gary L. Kieper pursuant to 28 U.S.C. § 1746. Declaration is attached hereto as Exhibit "A".

Respectfully submitted,

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By: /s/ Keith T. Grumer  
KEITH T. GRUMER  
FLORIDA BAR No.: 550416

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on 1<sup>st</sup> day of October, 2014, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties either via transmission of Notices of Electronic Filing generated by CM/ECF or vial U.S. Mail for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ Keith T. Grumer