# 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.

# **NOTICE OF FILING DECLARATION OF KEITH T. GRUMER**

Defendants, PARTNERS IN HEALTH CARE ASSOCIATION, INC. and GARY L.

KIEPER, through undersigned counsel, hereby file the Declaration of Keith T. Grumer, Esq.

pursuant to 28 U.S.C.§1746. Declaration is attached hereto as Exhibit "A".

Respectfully submitted,

GRUMER & MACALUSO, P.A. Attorneys for DEFENDANTS One East Broward Boulevard, Suite 1501 Fort Lauderdale, Florida 33301 (954) 713-2700 (954) 713-2713 (fax) Primary Email: <u>Service@grumerlaw.com</u> Secondary Emails: <u>slopez@grumerlaw.com</u> slopez@grumerlaw.com

By: <u>/s/ Keith T. Grumer</u> 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: <u>/s/ Keith T. Grumer</u>