

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

FEDERAL TRADE COMMISSION,)	
)	
Plaintiff,)	
)	
v.)	
)	
LATRESE & KEVIN ENTERPRISES INC.,)	
a Florida Corporation, also doing business as)	
HARGRAVE & ASSOCIATES FINANCIAL)	
SOLUTIONS,)	Case No. 3:08-cv-01001-MMH-JRK
)	
LATRESE HARGRAVE, also known as)	
Latrese V. Williams, individually and as an)	
officer of Latrese & Kevin Enterprises Inc., and)	
)	
KEVIN EDWARD WADE, also known as)	
Kevin Hargrave, Sr., individually and)	
as an officer of Latrese & Kevin Enterprises Inc.)	
)	
Defendants.)	
)	

PLAINTIFF’S *RENEWED* MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56(a), Plaintiff moves this Court for summary judgment against Defendants Latrese & Kevin Enterprises Inc., doing business as Hargrave & Associates Financial Solutions, Latrese Hargrave, and Kevin E. Wade, also known as Kevin Hargrave, Sr. Defendants deceptively marketed and sold credit repair services and advance fee credit cards. As set forth in Plaintiff’s Memorandum of Law in Support of Plaintiff’s *Renewed* Motion for Summary Judgment (“Plaintiff’s Memorandum of Law”), no genuine issue of material fact remains to be litigated.

In support of Plaintiff’s Memorandum of Law, Plaintiff submits eight exhibits that

are additional evidence supporting Plaintiff's Motion for Summary Judgment. Evidence Plaintiff previously submitted in support of Plaintiff's Motion for Temporary Restraining Order on October 20, 2008 (Dkt. No. 6, Volumes I-IV) are also used to support this Motion. Plaintiff also submits a proposed Final Judgment and Order for Permanent Injunction and Other Equitable Relief that includes relief to prevent future violations of law and provide restitution to consumers.

Dated: October 21, 2009

Respectfully submitted,

/s/Jessica D. Gray
JESSICA D. GRAY, Trial Counsel
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FEDERAL TRADE COMMISSION
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CERTIFICATE OF SERVICE

I, Jessica D. Gray, hereby certify that on October 21, 2009, Plaintiff's *Renewed* Motion for Summary Judgment against Defendants Latrese & Kevin Enterprises Inc., Latrese Hargrave and Kevin Hargrave; Memorandum in Support thereof; Proposed Order; and Exhibits 68-75 were electronically filed with the Clerk of Court using CM/ECF and were mailed first-class to the following:

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Executed on this 21st day of October 2009.

/s/Jessica D. Gray
Jessica D. Gray
Counsel for Plaintiff