

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

American Board of Internal Medicine,

Plaintiff,

vs.

Jaime Antonio Salas Rushford, M.D.,

Defendant.

Civil Action No. 14-cv-06428-KSH-CLW

**Declaration of
Jaime Salas Rushford, MD
in support of
Motion to Compel Discovery from ABIM**

Pursuant to 28 U.S.C. § 1746, I, Jaime A. Salas Rushford, M.D., hereby declare and state as follows:

1. I am the Defendant in the above-captioned matter.
2. I am submitting this Declaration in support of Defendant's Brief in Support of Motion to Compel Discovery from Plaintiff, to find an admission against interest proven and for Attorney's Fees.
3. I have reviewed in detail the contents of said Brief and am aware of the following determinations that I hereby confirm:
 - a. The information regarding my income and related matters in that paragraph is accurate.
 - b. My tax returns reflect the numbers stated on the Brief, specifically that my gross income for 2015 was \$69,725, which after expenses turned into a net loss of \$1,875 (with an additional carryover in losses that my tax preparer recommended for next year); and that for the year 2012, my gross income was \$126,874 and my net taxable income was \$64,194 after subtracting the expenses related to running my solo practice, among others allowed by law.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Date: May 2, 2016.



Jaime A. Salas Rushford, M.D.