

**UNITED STATES OF AMERICA  
FEDERAL TRADE COMMISSION**

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 )  
 ) **AGREEMENT CONTAINING**  
 ) **CONSENT ORDER**  
**Management Services Corporation,** )  
 )  
 )  
 ) **FILE NO.**  
 \_\_\_\_\_ )

The Commission has conducted an investigation of certain acts and omissions of the Respondent, Manageable Management Services Corporation (“proposed respondent”). The Respondent, having been represented by counsel, is willing to enter into an agreement with the Commission and the Commission is willing to enter into an order resolving the allegations contained in the attached draft complaint. The Respondent is a Delaware corporation with its principal office or place of business at 240 Emery Street, Bethlehem, Pennsylvania.

The Respondent neither admits nor denies any of the allegations in the draft complaint, except as specifically stated in this order. Only for purposes of this action, the Respondent admits the facts necessary to establish jurisdiction.

The Respondent waives:

the right to take any further procedural steps;

the requirement that the Commission’s decision contain a statement of findings of fact and conclusions of law; and

the right to seek judicial review or otherwise to challenge or contest the validity of the order entered pursuant to this agreement.

4. This agreement shall not become part of the public record of the proceeding unless and until it is accepted by the Commission. If this agreement is accepted by the Commission, it, together with the draft complaint, will be placed on the public record for a period of thirty (30) days and information about it publicly released. The Commission thereafter may either withdraw its acceptance of this agreement and so notify proposed respondent, in which event it will take such action as it may consider appropriate, or issue and serve its complaint (in such form as the circumstances may require) and decision in disposition of the proceeding.
5. This agreement contemplates that, if it is accepted by the Commission, and if such acceptance is not subsequently withdrawn by the Commission pursuant to the provisions

**IT IS ORDERED** that respondent and its officers, agents, representatives, and employees, whether acting directly or indirectly, in connection with the advertising, marketing, promotion, offering for sale, or sale of any product or service, in or affecting commerce, shall not misrepresent in any manner, expressly or by implication, the extent to which respondent is a member of, adheres to, complies with, is certified by, is endorsed by, or otherwise participates in any privacy or security program sponsored by the government or any other self-regulatory or standard-setting organization, including, but not limited to, the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework.

II.

**IT IS FURTHER ORDERED**  
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order; the proposed filing of a bankruptcy petition; or a change in the corporate name or address. Provided, however, that, with respect to any proposed change in the corporation(s) about which respondent learns fewer than thirty (30) days prior to the date such action is to take place, respondent shall notify the Commission as soon as is practicable after obtaining such knowledge. Unless otherwise directed by a representative of the Commission in writing, all notices required by this Part shall be emailed to [Debrief@ftc.gov](mailto:Debrief@ftc.gov) or sent by overnight courier (not the U.S. Postal Service) to: Associate Director of Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580. The subject line must begin: In re The Receivable Management Services Corporation, FTC File No. 13031.

V.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2014.

The Receivable Management Services Corporation

Dated: \_\_\_\_\_

By: \_\_\_\_\_  
DANIEL L. MONTENARO, President  
The Receivable Management Services Corporation

Dated: \_\_\_\_\_

By: \_\_\_\_\_  
KATHERINE WHITE  
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APPROVED:

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CHRISTOPHER N. OLSEN  
Assistant Director  
Division of Privacy and Identity Protection

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MANEESHA MITHAL  
Associate Director  
Division of Privacy and Identity Protection

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JESSICA L. RICH  
Director  
Bureau of Consumer Protection