

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FEDERAL TRADE COMMISSION,

*Plaintiff,*

v.

ALLIANCE SECURITY INC., a Massachusetts  
corporation formerly known as Verastyle

and Section 621(a) of the Fair Credit Reporting Act, 15 U.S.C. § 1681s(a). The Commission and Defendant Alliance Security Inc. stipulate to the entry of this Stipulated Final Order for Permanent Injunction and Civil Penalty Judgment ("Order") to resolve all matters in dispute in this action between them, but not as to any other person, such as an indemnitee.

THEREFORE, IT IS ORDERED as follows:

**FINDINGS**

1. This Court has jurisdiction over this matter.
2. The Complaint charges that Defendant Alliance Security Inc. participated in deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and has engaged in acts or practices that violate the FTC's Telemarketing Sales Rule (the "TSR" or "Rule"), as amended, 16 C.F.R. Part 310, in the Telemarketing of their products and services or the Telemarketing of his clients' products and services by, among other things, initiating and causing the initiation of telemarketing calls to consumers whose telephone numbers were on the National Do Not Call ("DNC") Registry. The Complaint also charges that Defendant Alliance Security participated in acts and practices in violation of Section 621(a) of the Fair Credit Reporting Act, 15 U.S.C. § 1681(s)(a), by obtaining consumer reports from consumer reporting agencies without a permissible purpose.

3. The Commission's action against Defendant is not stayed by the Defendant's bankruptcy filing under 11 U.S.C. § 362(a) because it is an exercise of the Commission's police or regulatory power as a governmental unit pursuant to 11 U.S.C. § 362(b)(4) and thus falls within an exemption to the automatic stay.

4. Defendant Alliance Security Inc. neither admits nor denies any of the allegations in the Complaint, except as specifically stated in this Order. Only for purposes of this action, Defendant Alliance Security Inc. admits the facts necessary to establish jurisdiction.

5. Defendant Alliance Security Inc. waives any claim that it may have under the





B. Using any Consumer Report for any purpose unless Defendant proves it had prior

for the designated purpose before using it.

B. The suspension of the judgment will be lifted if, upon motion by the Commission, the Court finds that Defendant failed to disclose any material asset, materially misstated the value of any asset, or made any other material misstatement or omission in the initial disclosures or monthly operating reports Defendant filed in connection with its chapter 11 bankruptcy proceeding, *In re Alliance Security Inc.*, Case No. 1:17-bk-11190 (Bankr. D. R.I.).

C. If the suspension of the judgment is lifted, the judgment becomes immediately

~~in the amount specified in Subsection A above (which the parties stipulate only for purposes~~

~~of the amount of the civil penalty for the violations alleged in the~~

above, may be used for collecting and reporting on any delinquent amount arising out of this Order in accordance with 31 U.S.C. § 7701

**VI. Customer Information**

IT IS FURTHER ORDERED that Defendant, Defendant's officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who

Sections 2701-2712 of the Electronic Communications Privacy Act, to the disclosure of the contents and records of its auto-dialed, Telemarketing communications or other information pertaining to its auto-dialed, Telemarketing communications by electronic communications

service providers and remote computing service providers. Defendant further agrees to execute, within fourteen (14) days of a request from the Commission, any forms or other documents evidencing its consent that may be required by such electronic communications service providers or remote computing service providers.

**VIII. Order Acknowledgments**

IT IS FURTHER ORDERED that Defendant obtain acknowledgments of receipt of this Order:

- A. Defendant, within seven days of entry of this Order, must submit to the



**IX. Compliance Reporting**

IT IS FURTHER ORDERED that Defendant make timely submissions to the

Commission;

A. One year after entry of this Order, Defendant must submit a compliance report.

sworn under penalty of perjury:

1. Defendant must: (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission may use to communicate with

D. Any submission to the Commission required by this Order to be sworn under penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by

concluding: "I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on: \_\_\_\_\_" and supplying the date, signature,

full name, title (if applicable), and signature.

E. Unless otherwise directed by a Commission representative in writing, all submissions to the Commission pursuant to this Order must be emailed to [DEbrief@ftc.gov](mailto:DEbrief@ftc.gov) or sent by overnight courier (not the U.S. Postal Service) to: Associate Director for Enforcement

**XI. Compliance Monitoring**

IT IS FURTHER ORDERED that, for the purpose of monitoring Defendant Alliance

Security's compliance with this Order, including the financial representations upon which part of

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

the judgment was suspended and any failure to transfer assets pursuant to this Order

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

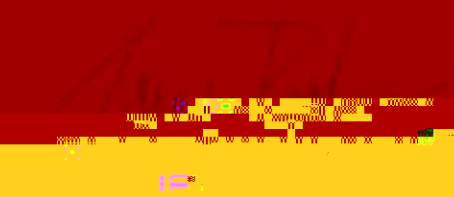
\_\_\_\_\_

\_\_\_\_\_

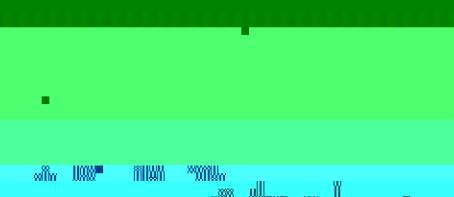
\_\_\_\_\_

# SO STIMULATED AND INCREDIBLY LOVED:

## FEDERAL TRADE



## Federal Trade



www.ftc.gov

(800) 368-1090

www.ftc.gov

7/13

www.ftc.gov

www.ftc.gov

www.ftc.gov