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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION  
CASE NO. 02-21760-CTV-JORDAN  
THIS IS A CONSENT CASE - Magistrate Judge Brown

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

INSPIRED VENTURES, INC.,  
a Florida corporation;

I.V.I. MANAGEMENT CORP.,  
a Florida corporation;

SOURCE SYSTEMS, INC.,  
a Florida corporation;

JESSE ALPER, individually and as an officer or  
director; and

VICTOR ALPER, individually and as an officer or  
director.

Defendants.

STIPULATED FINAL JUDGMENT AND ORDER  
FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF AS TO  
DEFENDANTS INSPIRED VENTURES, INC., I.V.I. MANAGEMENT CORP.,  
SOURCE SYSTEMS, INC., AND VICTOR ALPER

This matter comes before the Court on stipulation of Plaintiff Federal Trade Commission ("FTC" or "Commission") and Defendants Inspired Ventures, Inc. ("Inspired Ventures"), I.V.I. Management Corp. ("I.V.I. Management"), Source Systems, Inc. ("Source Systems"), and Victor Alper (collectively, the "Settling Defendants"). The other Defendant in this case, Jesse Alper, has executed this Stipulation to bind the Corporate Defendants, but is not joining this Stipulation as an individual party.

On June 12, 2002, the Commission filed a Complaint for Injunctive and Other Equitable Relief, including redress to consumers, pursuant to Sections 5(a), 13(b), and 19 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 45(a), 53(b), and 57b, and the FTC's Trade

Regulation Rule entitled "Disclosure Requirements and Prohibitions Concerning Franchising and Business Opportunity Ventures" (the "Franchise Rule" or the "Rule"), 16 C.F.R. Part 436. The Commission also immediately moved *ex parte* for a Temporary Restraining Order ("TRO") pursuant to Federal Rule of Civil Procedure 65 and Local Rule 7.1.E. The next day, on June 13, 2002, this Court, having considered the Complaint as well as the memorandum of law, declarations, and other exhibits filed in support of Plaintiff's motion, issued a TRO. The TRO, *inter alia*, appointed a temporary receiver for Inspired Ventures, Inc., as the sole named corporate defendant at that time, and for I.V.I. Management and Source Systems, as affiliates of Inspired Ventures. The Court subsequently accepted a stipulation, which continued essentially all of the conditions of the TRO, on June 26, 2002, and issued a Stipulated Preliminary Injunction Order in final form on June 28, 2002. On December 17, 2002, the Commission filed an Amended Complaint adding I.V.I. Management and Source Systems as named defendants. Now, Plaintiff and the Settling Defendants stipulate to the following Stipulated Final Judgment and Order for Permanent Injunction and Other Equitable Relief As To Defendants Inspired Ventures, Inc., I.V.I. Management Corp., Source Systems, Inc., and Victor Alper (the "Final Order").

It is hereby **ORDERED, ADJUDGED, and DECREED** as follows:

#### FINDINGS

1. This Court has jurisdiction over the subject matter of this case and the parties hereto.
2. Venue is proper as to all parties in the Southern District of Florida under 15 U.S.C. § 53(b) and 28 U.S.C. §§ 1391(b) and (c).
3. The activities of Settling Defendants are in or affecting commerce, as defined in Section 4 of the FTC Act, 15 U.S.C. § 44.
4. The Complaint alleges claims upon which relief may be granted against Settling Defendants under §§ 5(a)(1), 13(b), and 19 of the FTC Act, 15 U.S.C. §§ 45(a)(1), 53(b), and 57b, and under the Franchise Rule, 16 C.F.R. Part 436.

5. Plaintiff and Settling Defendants stipulate and agree to this Final Order to settle and resolve all matters in dispute between them arising from the Complaint to the date of entry of this Final Order.

6. Settling Defendants have waived all rights that may arise under the Equal Access to Justice Act, 28 U.S.C. § 2412, *amended by* Pub. L. No. 104-121, 110 Stat. 847, 863-64 (1996).

7. Settling Defendants acknowledge that they have read the provisions of this Final Order and have agreed to abide by them.

8. Settling Defendants waive all rights to seek appellate review or otherwise challenge or contest the validity of this Final Order.

9. Settling Defendants waive and release any claim they may have against the FTC, the Receiver, the Receiver's counsel, and the employees, representatives, or agents of any of the foregoing.

10. Entry of this Final Order is in the public interest.

11. This Final Order is for settlement purposes only and does not constitute an admission by any Settling Defendant of a violation of any law or regulation.

#### DEFINITIONS

For the purpose of this Final Order, the following definitions shall apply:

1. "Assets" means any legal or equitable interest in, right to, or claim to, any real and personal property, including, but not limited to chattel, goods, instruments, equipment, fixtures, general intangibles, inventory, checks, notes, leaseholds, effects, contracts, mail or other deliveries, shares of stock, lists of consumer names, accounts, credits, premises, receivables, funds, and cash, wherever located, whether in the United States or abroad;

2. "Business Venture" means any written or oral business arrangement, however denominated, whether or not covered by the Franchise Rule, which consists of the payment of any consideration for:

- a. The right or means to offer, sell, or distribute goods or services (whether or not identified by a trademark, service mark, trade name, advertising, or other commercial symbol) in "commerce" as defined in Section 4 of the FTC Act, 15 U.S.C. § 44; and
  - b. More than nominal assistance to any person or entity in connection with or incident to the establishment, maintenance, or operation of a new business or the entry by an existing business into a new line or type of business;
3. "Settling Defendants" means the Corporate Defendants, Inspired Ventures, Inc., I.V.I. Management Corp., Source Systems Inc., as well as the Individual Defendant Victor Alper. The term does not include Defendant Jesse Alper;
4. "Document" is synonymous in meaning and equal in scope to the usage of the term in Federal Rule of Civil Procedure 34(a), and includes writings, drawings, graphs, charts, photographs, audio and video recordings, computer records, and other data compilations from which information can be obtained and translated, if necessary, through detection devices into reasonably usable form. A draft or non-identical copy is a separate document within the meaning of the term;
5. "Person" means a natural person, an organization or other legal entity, including a corporation, partnership, sole proprietorship, limited liability company, association, cooperative, or any other group or combination acting as an entity;
6. "Receiver" means Chris McAiley, as previously appointed by this Court, or such other person as the Court directs. Receiver's counsel is David Mandel of Mandel & McAiley LLP or such other counsel as the Receiver designates; and
7. "Telemarketing" means any plan, program, or campaign (whether or not covered by the Telemarketing Sales Rule, 16 C.F.R. Part 310) that is conducted to induce the purchase of goods, services, or a charitable contribution by use of one or more telephones.

**INJUNCTIVE RELIEF****I. BAN ON MARKETING BUSINESS VENTURES**

**IT IS THEREFORE ORDERED** that Settling Defendants, whether acting directly or through any corporation, limited liability company, subsidiary, division, or other device, are hereby permanently restrained and enjoined from or assisting or facilitating in:

- A. Advertising, promoting, offering for sale, or selling any Business Venture; or
- B. Receiving any remuneration of any kind whatsoever from holding any ownership interest, share, or stock in, or serving as an employee, officer, director, trustee, general manager of, or consultant or advisor to, any business entity engaged in or assisting in the advertising, promoting, offering for sale, or sale of any Business Venture.

**II. BAN ON FUTURE TELEMARKETING ACTIVITIES**

**IT IS FURTHER ORDERED** that Settling Defendants are permanently restrained and enjoined from engaging, participating, assisting or facilitating in any manner or capacity whatsoever, directly or indirectly, individually or through any corporation, limited liability company, subsidiary, division, or other device, in any telemarketing of any kind.

**III. INJUNCTION AGAINST MISREPRESENTATIONS**

**IT IS FURTHER ORDERED** that in connection with the advertising, promoting, offering for sale, or sale of any good or service by any means whatsoever, each of the Settling Defendants, and their successors, assigns, officers, agents, servants, employees, and those persons in active concert or participation with them who receive actual notice of this Final Order by personal service, facsimile, or otherwise, whether acting directly or through any corporation, limited liability company, subsidiary, division, or other entity, are hereby permanently restrained and enjoined from making, or assisting and facilitating others in making, either expressly or by implication, any false or misleading representation.

**RECEIVERSHIP****IV. RECEIVER**

**IT IS FURTHER ORDERED** that:

- A. Chris McAiley, Esq., or such other person as the Court directs, is appointed as the Receiver, with the full power of an equity receiver, for the Corporate Defendants and all the funds, properties, premises, accounts, and other assets directly or indirectly owned, beneficially or otherwise, by the Corporate Defendants, with directions and authority to accomplish the following:
1. Maintain full control of the Corporate Defendants;
  2. Maintain exclusive custody, control, and possession of all the funds, property, mail and other assets of, in the possession of, or under the control of the Corporate Defendants, wherever situated. The Receiver shall have full power to sue for, collect, receive, and take possession of all goods, chattels, rights, credits, moneys, effects, land, leases, books, records, work papers, and records of accounts, including computer-maintained information, and other papers and documents of the Corporate Defendants, including documents related to customers or clients whose interests are now held by or under the direction, possession, custody, or control of the Corporate Defendants;
  3. Preserve, hold, and manage all receivership assets, and perform all acts necessary to preserve the value of those assets, in order to prevent any loss, damage, or injury to customers or clients;
  4. Prevent the withdrawal or misapplication of funds entrusted to the Corporate Defendants and otherwise protect the interests of customers or clients;

5. Manage and administer the Corporate Defendants by performing all acts incidental thereto that the Receiver deems appropriate, including hiring or dismissing any and all personnel or suspending operations;
  6. Collect all money owed to the Corporate Defendants;
  7. Initiate, defend, compromise, adjust, intervene in, dispose of, or become a party to any actions or proceedings in state, federal, or foreign court necessary to preserve or increase the assets of the Corporate Defendants or to carry out the Receiver's duties pursuant to this Final Order;
  8. Choose, engage, and employ attorneys, accountants, appraisers, and other independent contractors and technical specialists, as the Receiver deems advisable or necessary, in the performance of duties and responsibilities under the authority granted by this Final Order;
  9. Open one or more bank accounts as designated depositories for funds of the Corporate Defendants. The Receiver shall deposit all funds of the Corporate Defendants in such designated accounts and shall make all payments and disbursements from the receivership estate from such accounts;
  10. Make payments and disbursements from the Corporate Defendants that are necessary or advisable for carrying out the directions of, or exercising the authority granted by, this Final Order. The Receiver shall apply to the Court for prior approval of any payment of any debt or obligation incurred by the Corporate Defendants prior to the date of entry of this Final Order, except for payments that the Receiver deems necessary or advisable to secure assets of the Corporate Defendants;
- B. Within 60 days of the entry of this Final Order, the Receiver is directed to:
1. Marshal the records and liquidate the assets of the Corporate Defendants.

- and dissolve and wind-up the Corporate Defendants;
2. File with the Court, and serve on the parties, a final report describing the wind-up of the business of the Corporate Defendants and the scope of the Receiver's activities;
  3. File with the Court, and serve on the parties, a final accounting and request for the payment of reasonable compensation on behalf of the Receiver and any personnel retained by the Receiver; and
- C. After entry by the Court of an order on the Receiver's final accounting and request for compensation, the Receiver shall transfer to the FTC any funds of the Corporate Defendants (less fees and expenses allowed by the Court) in partial satisfaction of the Judgment herein and then terminate the Corporations to end the Receivership.

**V. DUTY TO COOPERATE WITH RECEIVER**

**IT IS FURTHER ORDERED** that Settling Defendants shall cooperate with:

- A. The Receiver in all reasonable requests relating to implementation of this Final Order, including the transfer of funds of the Corporate Defendants. This cooperation and assistance shall include, but not be limited to, providing any information and executing any documents that the Receiver deems necessary to exercising the authority and discharging the responsibilities of the Receiver under Orders of this Court; and
- B. The FTC in any continuing litigation of this matter. This cooperation includes, but is not limited to, maintaining all documents relevant to this litigation and assisting in the preparation of testimony and testifying fully, truthfully, and completely at any trial in this matter, if called upon to do so.



**REDRESS AND OTHER EQUITABLE RELIEF****VI. MONETARY JUDGMENT****IT IS FURTHER ORDERED that:**

- A. Judgment is entered jointly and severally against Inspired Ventures, I.V.I. Management, Source Systems, and Victor Alper in the amount of \$2,653,968, which the Plaintiff and Settling Defendants stipulate is the amount of consumer injury caused by Defendants;
- B. The judgment shall be partially satisfied as follows:
1. Settling Defendants hereby release to the Commission all dominion, title, and control to all monies frozen pursuant to the Preliminary Injunction entered by this Court on June 28, 2002;
  2. Settling Defendants hereby release to the Commission all dominion, title, and control of any funds of the Corporate Defendants remaining in the receivership estate, pursuant to this Final Order;
- C. All funds paid pursuant to this Paragraph VI shall be deposited into a fund administered by the Commission or its agent to be used for equitable relief, including, but not limited to, consumer redress and any attendant expenses for the administration of any redress fund. In the event that direct redress to consumers is wholly or partially impracticable or funds remain after redress is completed, the Commission may pay any remaining funds for such other equitable relief (including consumer information remedies) as it determines to be reasonably related to Defendants' practices as alleged in the Complaint. Any funds not used for such equitable relief shall be deposited into the Treasury as disgorgement. Defendants shall have no right to challenge the Commission's choice of remedies under this Paragraph; and
- D. The execution of the remainder of this judgment is suspended, subject to the

provisions of Paragraph VII, which is the Right to Reopen.

**VII. RIGHT TO REOPEN**

**IT IS FURTHER ORDERED** that:

- A. The Commission's agreement to this Final Order is expressly premised upon the financial condition of all Defendants as represented in the sworn financial statements provided to the Commission by Inspired Ventures (executed on June 22, 2002, with the addendum presented January 6, 2003), by Jesse Alper (executed on December 18, 2002), and by Victor Alper (executed on December 19, 2002), which include material information upon which the Commission relied in negotiating and consenting to this Final Order for the Settling Defendants;
- B. If, upon motion by the Commission, this Court finds that any Settling Defendant made a material misrepresentation or omitted material information concerning any Settling Defendant's financial condition, then the Court shall enter a modified judgment holding any such Settling Defendant(s) liable to the Commission in the amount of \$2,653,968, which the Plaintiff and Settling Defendants stipulate is the amount of consumer injury caused by Defendants. This amount, less the sum of payments previously made pursuant to this Final Order, shall become immediately due and payable by those Settling Defendants, together with interest computed at the rate prescribed under 28 U.S.C. § 1961, as amended;
- C. Settling Defendants agree that the facts alleged in the Complaint filed in this action shall be taken as true in any subsequent litigation filed by the Commission to enforce its rights pursuant to this Final Order, and
- D. Any proceedings instituted under this Section are in addition to, and not in lieu of, any other civil or criminal remedies as may be provided by law, including any other proceedings that the FTC may initiate to enforce this Final Order.

**VIII. COSTS**

**IT IS FURTHER ORDERED** that each party shall bear its own costs and attorney's fees incurred in connection with this action.

**IX. LIFTING OF THE ASSET FREEZE**

**IT IS FURTHER ORDERED** that the freeze of the Corporate Defendants' assets, pursuant to Section III of the Preliminary Injunction entered by this Court on June 28, 2002, shall remain in effect, except as necessary for the Receiver to liquidate all assets of the Corporate Defendants, until the Receiver winds up all activities and operations of the Corporate Defendants pursuant to this Final Order. The freeze of the assets of Victor Alper is lifted upon signing of this Final Order. The freeze of the assets of Jesse Alper is unaffected by this Final Order.

**X. PROHIBITIONS INVOLVING CUSTOMER LISTS**

**IT IS FURTHER ORDERED** that Settling Defendants and their agents, employees, officers, corporations, successors, and assigns, and those persons in active concert or participation with them who receive actual notice of this Final Order by personal service, facsimile, or otherwise, are permanently restrained and enjoined from using, selling, renting, leasing, transferring, or otherwise disclosing the name, address, telephone number, credit card number, bank account number, e-mail address, or other identifying information of any person who paid any money to any of the Defendants at any time prior to the effective date of this Final Order in connection with the sale of business ventures; *provided* that Defendants may disclose such identifying information to a law enforcement agency or as required by any law, regulation, or court order.

**COMPLIANCE****XI. COMPLIANCE MONITORING**

**IT IS FURTHER ORDERED** that, for the purpose of monitoring and investigating compliance with any provision of this Final Order:

- A. Within ten days of receipt of written notice from a representative of the

Commission, Settling Defendants each shall submit additional written reports, sworn to under penalty of perjury; produce documents for inspection and copying; appear for deposition; and/or provide entry during normal business hours to any business location in such Settling Defendant's possession or direct or indirect control to inspect the business operation;

B. In addition, the Commission is authorized to monitor compliance with this Final Order by all other lawful means, including but not limited to the following:

1. obtaining discovery from any person, without further leave of court, using the procedures prescribed by Fed. R. Civ. P. 30, 31, 33, 34, 36, and 45;
2. posing as consumers and suppliers to: Settling Defendants, any Settling Defendant's employees, or any other entity managed or controlled in whole or in part by any Settling Defendant, without the necessity of identification or prior notice;

*Provided* that nothing in this Final Order shall limit the Commission's lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1, to obtain any documentary material, tangible things, testimony, or information relevant to unfair or deceptive acts or practices in or affecting commerce (within the meaning of 15 U.S.C. § 45(a)(1)); and

C. Settling Defendants shall permit representatives of the Commission to interview any employer, consultant, independent contractor, representative, agent, or employee who has agreed to such an interview, relating in any way to any conduct subject to this Final Order. The person interviewed may have counsel present.

## **XII. COMPLIANCE REPORTING BY VICTOR ALPER**

**IT IS FURTHER ORDERED** that, in order that compliance with the provisions of this Final Order may be monitored:

- A. For a period of five (5) years from the date of entry of this Final Order. Victor

Alper shall notify the Commission of the following:

1. Any changes in Victor Alper's residence, mailing addresses, and telephone numbers, within ten (10) days of the date of such change;
  2. Any changes in Victor Alper's employment status (including self-employment) within ten (10) days of the date of such change. Such notice shall include the name and address of each business that he is affiliated with, employed by, or performs services for; a statement of the nature of the business; and a statement of his duties and responsibilities in connection with the business; and
  3. Any changes in Victor Alper's name or use of any aliases or fictitious names;
- B. One hundred eighty (180) days after the date of entry of this Final Order, Victor Alper shall provide a written report to the FTC, sworn to under penalty of perjury, setting forth in detail the manner and form in which he has complied and is complying with this Final Order. This report shall include, but not be limited to:
1. Any changes required to be reported pursuant to subparagraph (A) above;
  2. A copy of each acknowledgment of receipt of this Final Order obtained by Victor Alper pursuant to Paragraph XIV of this Final Order entitled "Distribution of Order By Settling Defendants";
- C. For the purposes of this Final Order, Victor Alper shall, unless otherwise directed by the Commission's authorized representatives, mail all written notifications to the Commission to:

Associate Director for Marketing Practices  
Federal Trade Commission  
Room 238  
600 Pennsylvania Ave., N.W.  
Washington, DC 20580  
Re: *FTC v. Inspired Ventures, Inc., et al.*, Civil Action No. 02-CV-21760

D. For purposes of the compliance reporting required by this Paragraph, the Commission is authorized to communicate with Victor Alper through counsel at:

Andrew Cove  
Cove & Associates, PA  
225 South 21<sup>st</sup> Avenue  
Hollywood, FL 33020  
954-921-1121.

### XIII. RECORD KEEPING PROVISIONS

**IT IS FURTHER ORDERED** that, for a period of eight (8) years from the date of entry of this Final Order, for any business in which Victor Alper owns the majority of the business or directly or indirectly manages or controls the business, Victor Alper and his agents, employees, officers, corporations, successors, and assigns, and those persons in active concert or participation with him who receive actual notice of this Final Order by personal service or otherwise, are hereby restrained and enjoined from failing to create and retain the following records:

- A. Accounting records that reflect the cost of goods or services sold, revenues generated, and the disbursement of such revenues;
- B. Personnel records accurately reflecting: the name, address, and telephone number of each person employed in any capacity by such business, including as an independent contractor; that person's job title or position; the date upon which the person commenced work; and the date and reason for the person's termination, if applicable;
- C. Customer files containing the names, addresses, phone numbers, dollar amounts paid, quantity of items or services purchased, and description of items or services purchased, to the extent such information is obtained in the ordinary course of business;
- D. Complaints and refund requests (whether received directly, indirectly or through any third party) and any responses to those complaints or requests; and



**XVI. RETENTION OF JURISDICTION**

**IT IS FURTHER ORDERED** that this Court shall retain jurisdiction of this matter for all purposes, including construction, modification and enforcement of this Final Order.

**DONE AND ORDERED**, this \_\_\_\_\_ day of \_\_\_\_\_, 2003, in Miami, Florida.

\_\_\_\_\_  
United States Magistrate Judge

**SO STIPULATED:**

\_\_\_\_\_  
Chris McAiley, Esq.  
Receiver for Inspired Ventures, Inc.  
Dated: \_\_\_\_\_

**FOR PLAINTIFF:**

\_\_\_\_\_  
Brad Winter, Esq. (A5500668)  
K. Michelle Roden, Esq. (A5500669)  
Attorneys for Plaintiff  
Federal Trade Commission  
Dated: \_\_\_\_\_

**FOR DEFENDANTS:**

\_\_\_\_\_  
Andrew N. Cove, Esq.  
Hector E. Lora, Esq.  
Attorneys for Defendants  
Dated: 7/23/03

x \_\_\_\_\_  
Jesse Alper as President of  
Inspired Ventures, Inc.,  
I.V.I. Management Corp.,  
and Source Systems, Inc.  
Dated: 7/22/03

\_\_\_\_\_  
Victor Alper individually  
and as Officer/Director of I.V.I.  
Management Corp.  
Dated: 7/23/03



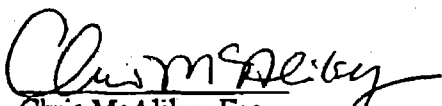
**XVI. RETENTION OF JURISDICTION**

**IT IS FURTHER ORDERED** that this Court shall retain jurisdiction of this matter for all purposes, including construction, modification and enforcement of this Final Order.

**DONE AND ORDERED**, this \_\_\_\_\_ day of \_\_\_\_\_, 2003, in Miami, Florida.

\_\_\_\_\_  
United States Magistrate Judge

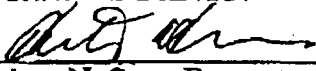
**SO STIPULATED:**


  
Chris McAiley, Esq.  
Receiver for Inspired Ventures, Inc.  
Dated: 9/22/03

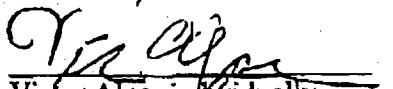
**FOR PLAINTIFF:**

\_\_\_\_\_  
Brad Winter, Esq. (A5500668)  
K. Michelle Roden, Esq. (A5500669)  
Attorneys for Plaintiff  
Federal Trade Commission  
Dated: \_\_\_\_\_

**FOR DEFENDANTS:**

  
\_\_\_\_\_  
Andrew N. Cove, Esq.  
Hector E. Lora, Esq.  
Attorneys for Defendants  
Dated: 7/23/03

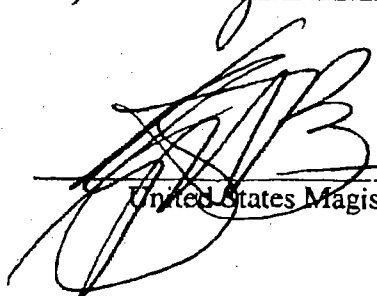
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\_\_\_\_\_  
Jesse Alper as President of  
Inspired Ventures, Inc.  
I.V.I. Management Corp.,  
and Source Systems, Inc.  
Dated: 7/22/03

  
\_\_\_\_\_  
Victor Alper individually  
and as Officer/Director of I.V.I.  
Management Corp.  
Dated: 7/23/03

**XVI. RETENTION OF JURISDICTION**

**IT IS FURTHER ORDERED** that this Court shall retain jurisdiction of this matter for all purposes, including construction, modification and enforcement of this Final Order.

**DONE AND ORDERED**, this 19<sup>th</sup> day of February, 2003, in Miami, Florida.

  
United States Magistrate Judge

**SO STIPULATED:**

Chris McAiley, Esq.  
Receiver for Inspired Ventures, Inc.  
Dated: \_\_\_\_\_

**FOR PLAINTIFF:**

K. Michelle Roden  
Brad Winter, Esq. (A5500668)  
K. Michelle Roden, Esq. (A5500669)  
Attorneys for Plaintiff  
Federal Trade Commission  
Dated: 11/24/03

**FOR DEFENDANTS:**

Andrew N. Cove, Esq.  
Hector E. Lora, Esq.  
Attorneys for Defendants  
Dated: 7/23/03

x Jesse Alper  
Jesse Alper as President of  
Inspired Ventures, Inc.,  
I.V.I. Management Corp.,  
and Source Systems, Inc.  
Dated: 7/02/03

Victor Alper  
Victor Alper individually  
and as Officer/Director of I.V.I.  
Management Corp.  
Dated: 7/23/03

(Appendix to Final Order)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION  
CASE NO. 02-21760-CIV-JORDAN  
THIS IS A CONSENT CASE - Magistrate Judge Brown

FEDERAL TRADE COMMISSION,  
Plaintiff,

v.

INSPIRED VENTURES, INC.,  
I.V.I. MANAGEMENT CORP.,  
SOURCE SYSTEMS, INC.,  
JESSE ALPER,  
VICTOR ALPER,  
Defendants.

AFFIDAVIT OF VICTOR ALPER

Victor Alper, being duly sworn, hereby states and affirms as follows:

1. My name is Victor Alper. My current residential address is \_\_\_\_\_

I am a citizen of the United States and am over the age of eighteen. I have personal knowledge of the facts set forth in this Affidavit.

2. I am a defendant in *FTC v. Inspired Ventures, Inc., et al.* (United States District Court for the District of Florida).

3. On this \_\_\_\_\_ day of \_\_\_\_\_, 2004, I received a copy of the Stipulated Final Judgment And Order For Permanent Injunction And Other Equitable Relief As To Defendants Inspired Ventures, Inc., I.V.I. Management Corp., Source Systems, Inc., and Victor Alper, which was signed and entered by the Honorable Magistrate Judge Brown and entered by the Court on the date of \_\_\_\_\_, 2004. A true and correct copy of the Order I received is appended to this Affidavit.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this \_\_\_\_\_ day of \_\_\_\_\_, 2004, in the city of \_\_\_\_\_ in the State of \_\_\_\_\_, within the United States.

\_\_\_\_\_  
Victor Alper

State of \_\_\_\_\_, City of \_\_\_\_\_

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2004.

\_\_\_\_\_  
Notary Public

My Commission Expires: \_\_\_\_\_

*gla*