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FEDERAL TRADE
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to obtain necessary civil liberties and initiative and other

Defendants. The terms of these contracts specified that Defendants were responsible for complying with the FCRA and furnishing applicants with the notice required under Section 604(b)(3) of the FCRA, 15 U.S.C. § 1681b(b)(3).

11. Section 604(b) of the FCRA, 15 U.S.C. § 1681b(b), governs the use of consumer reports for employment purposes. Before taking any adverse action against an applicant based on information in a consumer report, Defendants must give the applicant a copy of the consumer report and a copy of the applicant's rights under

the FCRA.

12. Although Defendants take adverse action against applicants based in whole or in

part on information in consumer reports, they failed to provide those applicants

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17. Section 615(a) of the FCRA, 15 U.S.C. § 1681m(a), requires any person who takes adverse action with respect to any consumer that is based in whole or in part on any information contained in a consumer report to provide to the consumer: (1) notice

21. The acts and practices described in Paragraphs 16 through 18 constitute a pattern or

series of violations as set forth in Section 611(a)(2)(A) of the FCRA

15 U.S.C. § 1681s(a)(2)(A).

CIVIL PENALTIES

- 22. Each instance in which Defendants have failed to comply with either Section 604(b)(3) or 615(a) of the FCRA, 15 U.S.C. §§ 1681b(b)(3) and 1681m(a), constitutes a separate violation of the FCRA for the purpose of assessing monetary civil penalties.
- 23. Section 621(a) of the FCRA, 15 U.S.C. § 621(a), authorizes the Court to award monetary civil penalties of not more than \$2,500 per violation.

Dated:

[REDACTED]

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