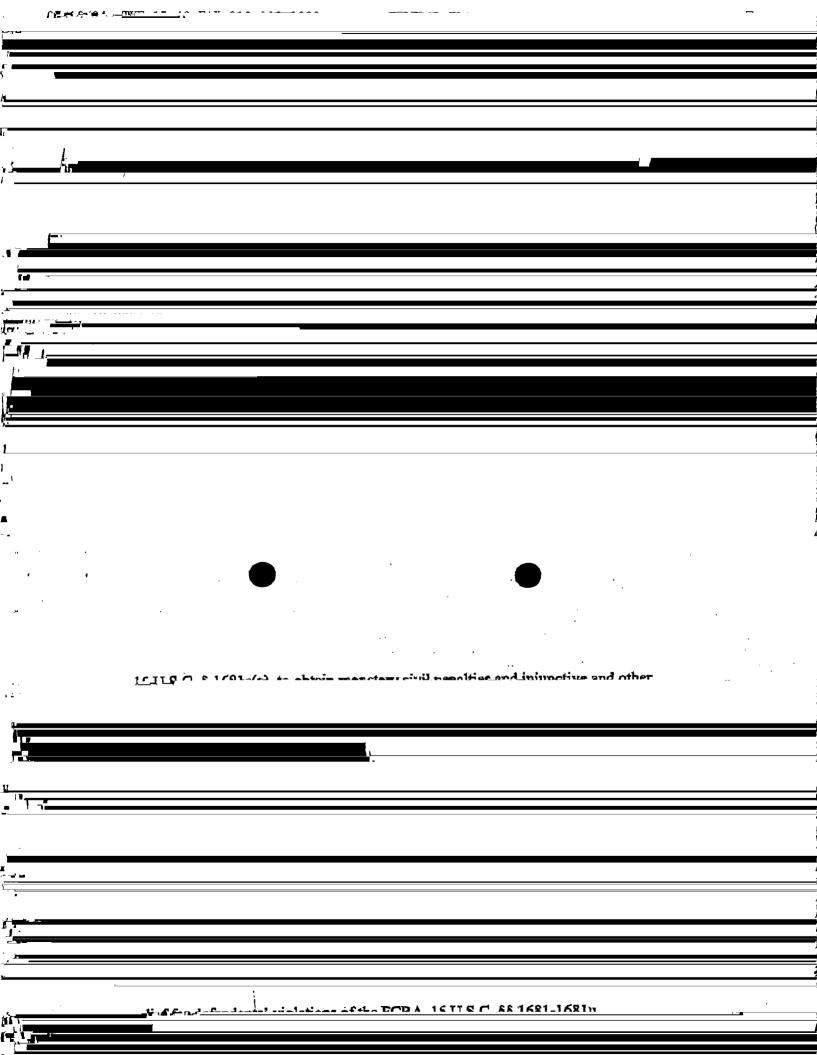
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Defendants. The terms of these contracts specified that Defendants were responsible for complying with the FCRA and furnishing applicants with the notice teaming under Section 604(h)(3) of the FCRA 15 U.S.C. 5 1681b(b)(3).

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	11.	Section 604(b) of the FCRA, 15 U.S.C. § 1681b(b), governs the use of consumer
	11.	Section 604(b) of the PCRA, 13 U.S.C. 9 To 10(b), governs the use of consumer
		reports for employment purposes. Before taking any adverse action against an
		Topotto 10x original purpose posterior and an arrange and arrange arrange and arrange arrange and arrange arra
		applicant based on information in a consumer report, Defendants must give the
		mplicages posses of the consumer report and a convent the applicant's rights under
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		41. TO 10 A :
		the FCRA.
	12,	Although Defendants take adverse action against applicants based in whole or in
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		The information in accommendation that failed to amyride those applicants
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Section 615(a) of the FCRA, 15 U.S.C. § 1681m(a), requires any person who takes 17. 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

_ 7	71. The acts and practices described in Paragraphs 16 through 12 constitute a nattern or	
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	man of the continue of alations on out Rock in Continue 671/03/03/A) as the BCD A	
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<b>-</b>	15 I I C C E 1691a(a)(2)(A)	

## CIVIL PENALTIES

- 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 panelties of not more than \$2 500 per violation.

Dated:

JOEL WINSTON
Associate Director for
Financial Practices

BRADLEY H. BLOWER RONALD G. ISAAC ERIC H. IMPERIAL PETER D. KEISLER
Assistant Attorney General
Civil Division
U.S. Department of Justice

DANIEL G. BOGDEN

Division of Financial Practices Federal Trade Commission

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