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BY:  _____
DEPUTY CLERK

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

UNITED STATES OF AMERICA,

Civil Action No.

Plaintiff

COMPLAINT FOR CIVIL RIGHTS VIOLATIONS

3. Venue is proper in the United States District Court for the District of Utah under 28 U.S.C. §§ 1391(b) - (c) and 1395(a), and 15 U.S.C. Section 53(b).

DEFENDANT

4. Defendant Far West Credit, Inc., is a for-profit corporation organized, existing, and doing business under the laws of the State of Utah. Its principal place of business is located at 1214 Wilmington Avenue, Suite 101, Salt Lake City, Utah 84106. At all times relevant to this complaint, defendant Far West Credit, Inc., has transacted business in this district

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5. Defendant Far West Credit, Inc., is a “consumer reporting agency” as that term is defined in Section 603(f) of the FCRA, 15 U.S.C. § 1681a(f). As part of its consumer reporting activities, Defendant assembles or evaluates consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. As such, Defendant is subject to Section 607 of the FCRA, 15 U.S.C. § 1681e, which imposes a series of compliance procedures upon consumer reporting agencies.

THE FAIR CREDIT REPORTING ACT

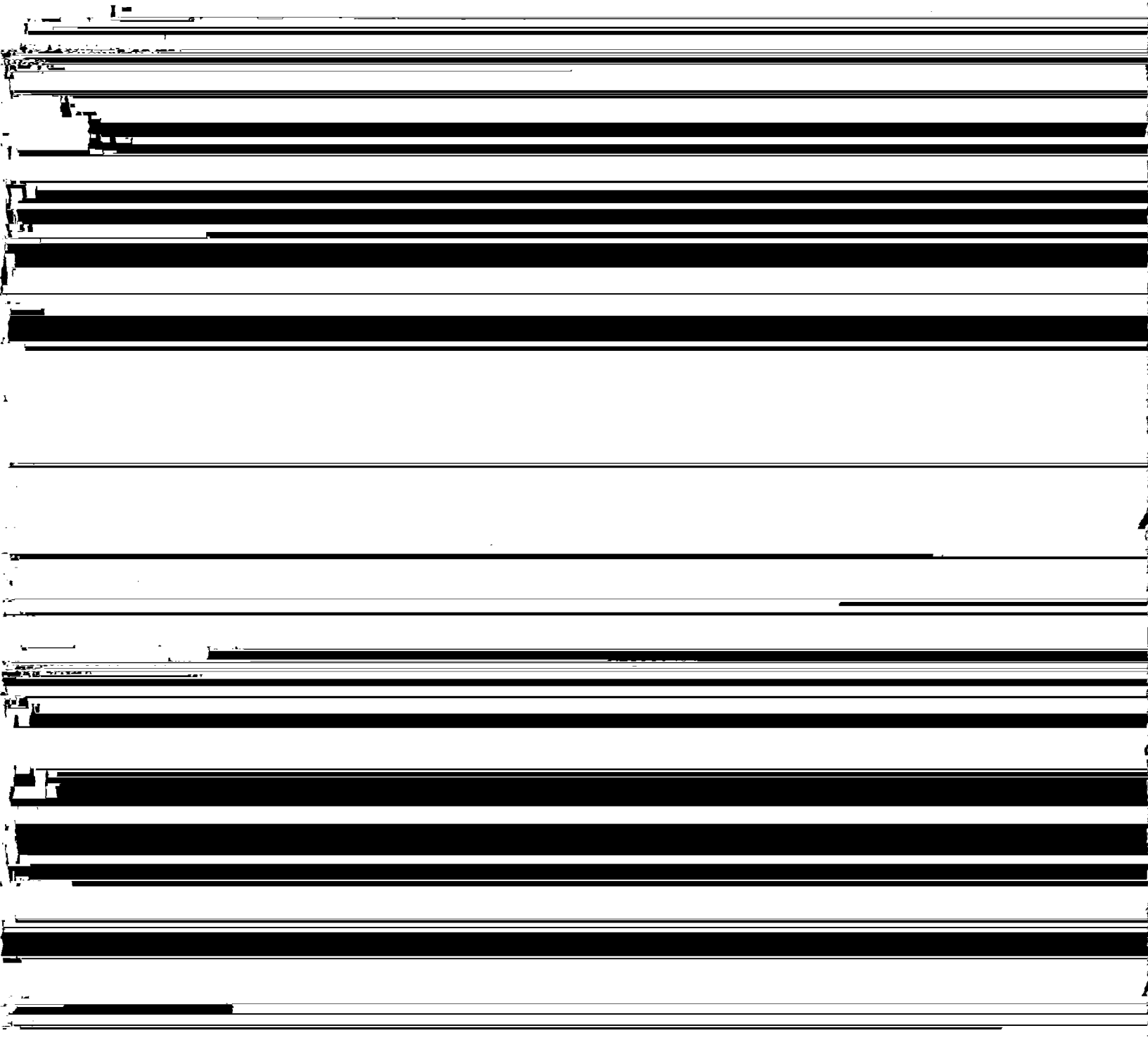
6. The FCRA was enacted in 1970 and became effective on April 25, 1971, and has been in force since that date.

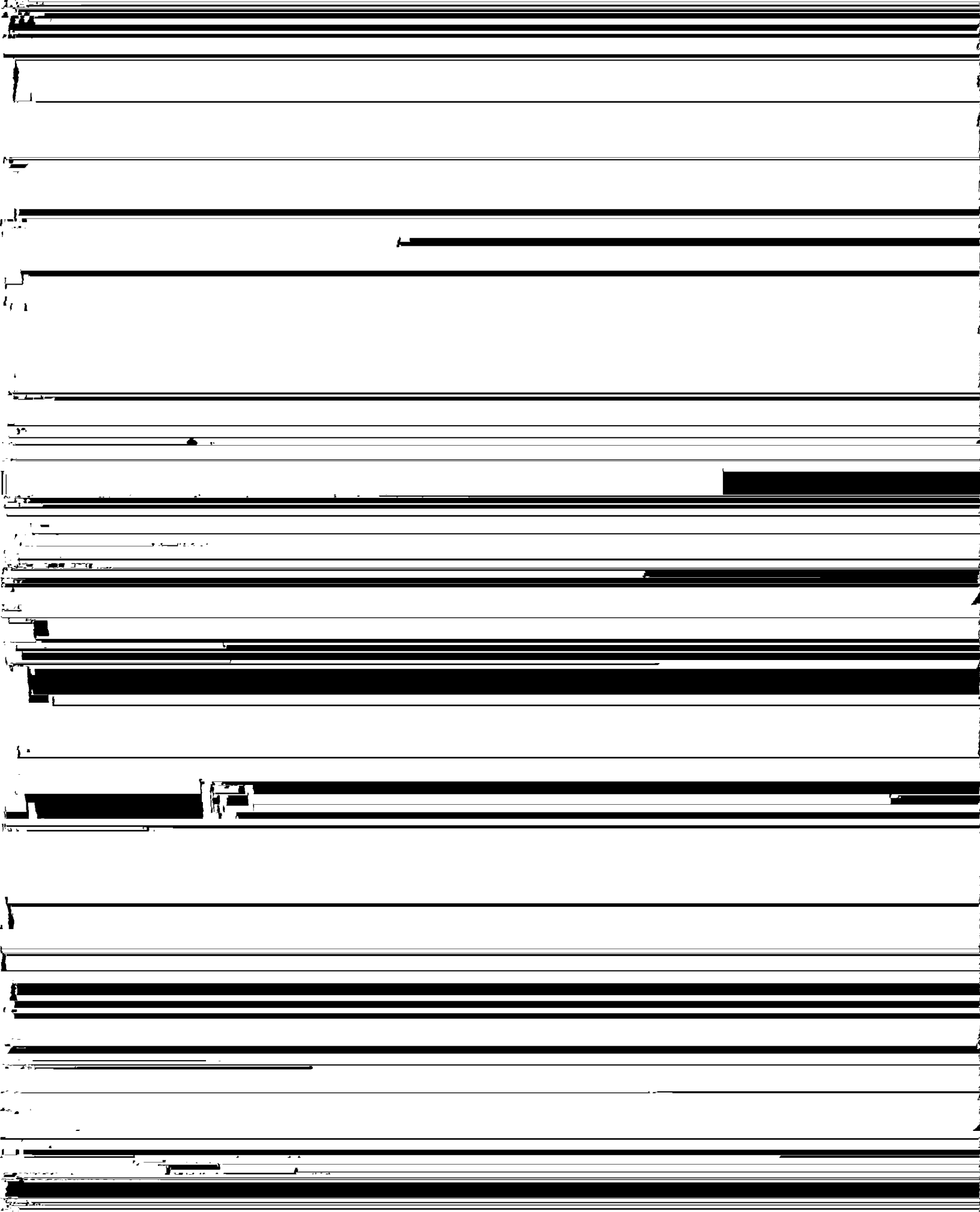
7. Section 603 of the FCRA, 15 U.S.C. § 1681a, defines the term “consumer reporting agency” as follows:

[REDACTED]

VIOLATIONS OF THE FAIR CREDIT REPORTING ACT

8. Section 607(b) of the FCRA, 15 U.S.C. § 1681e(b), requires consumer reporting agencies to follow reasonable procedures to assure maximum possible accuracy of the information contained in consumer reports that they disseminate.





CIVIL PENALTIES AND INJUNCTIVE RELIEF
FOR VIOLATIONS OF THE FAIR CREDIT REPORTING ACT

16. Section 607(b)(1) of the FCRA, 15 U.S.C. § 1691(b)(1), provides that

award monetary civil penalties of not more than \$2,500 per violation of Section 607(b).

17. Each instance in which Defendant produced a consumer report complained of herein

in violation of Section 607(b) of the FCRA, 15 U.S.C. § 1691(b), constitutes a separate violation

of Counsel:

FOR THE UNITED STATES OF AMERICA

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JS 44 (Rev. 11/04)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein will be used by the court to determine the appropriate filing fee and to determine the appropriate court to hear the case.

[The body of the form is almost entirely obscured by heavy black redaction bars.]

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint

(a) **Plaintiffs, Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only: