

**UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION**

COMMISSIONERS: **Jon Leibowitz, Chairman**
 J. Thomas Rosch
 Edith Ramirez
 Julie Brill
 Maureen K. Ohlhausen

**In the Matter of
EPN, Inc., also d/b/a Checknet, Inc. a
corporation.**

Docket No. C-

COMPLAINT

The Federal Trade Commission (“Commission”), having reason to believe that EPN, Inc., d/b/a Checknet Inc. (“EPN”) has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. Respondent EPN is a Utah corporation with its principal office or place of business at 746 East 1910 South, Suite 3, Provo, UT 84606.
2. The acts and practices of Respondent as alleged in this complaint are in or affecting commerce, as “commerce” is defined in Section 4 of the Federal Trade Commission Act.

RESPONDENT’S BUSINESS PRACTICES

3. At all relevant times, Respondent has been in the business of collecting debts for clients in a variety of industries, including

5. Respondent operates computer networks in conducting its business. Among other things, it uses the networks to receive, store, and use per

9. The breached files were shared to the P2P network from EPN's chief operating officer's computer, and other files containing personal information may have been shared to P2P networks from that computer.