

Civil Action No.

INC., a  
Delaware corporation,  
Defendant.

COMPLAINT FOR CIVIL PENALTIES, PERMANENT  
INJUNCTION, AND OTHER EQUITABLE RELIEF

Plaintiff, the United States of America, acting upon notification and authorization of the Attorney General by the Federal Trade Commission ("FTC"), for its Complaint alleges:

1. Plaintiff brings this action under sections 5(a), 5(m)(1)(A), 13(b), 16(a)(1), and 19 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 45(a), 45(m)(1)(A), 53(b), 56(a)(1), and 57b; and section 621(a) of the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681s(a), to obtain monetary civil penalties and injunctive or other relief for violations of the FTC Act, 15 U.S.C. §§ 45(a) and 57b; the FCRA, 15 U.S.C. §§ 1681-1681x, as amended by sections 211 and 312 of the Fair and Accurate Credit Transactions Act of 2003, Pub. L. No. 108-159, 117 Stat. 1952 (2003) ("FACT Act") and by sections 1061 and 1088 of the Dodd-Frank Wall Street and Consumer Protection Act, Pub. L. 111-203, 124 Stat. 1376 (2010) (codified in scattered sections of 12 U.S.C.) ("Dodd-Frank Act"); the Free Annual File Disclosures Rule, 16 CFR 610, issued pursuant to section 612(a)(1)(C)(i) of the FCRA, 15 U.S.C. § 1681j(a)(1)(C)(i), and recodified as Duties of Consumer Reporting Agencies Regarding Disclosures to Consumers, 12 C.F.R. § 1022, subpart N; and the Duties of Furnishers of









15. The FCRA imposes several obligations upon furnishers of information to CRAs, including obligations to establish and implement reasonable written policies and procedures





reinvestigation to consumers rather than fulfilling its legal obligation to reinvestigate disputed





b) Fail to provide before the expiration of the five business day period











**COUNT III**

**Consumer File Disclosures and Streamlined Process**

35. As described above in paragraph 25, Carteguy has not established the streamlined





40. Pursuant to section 621(a)(1) of the FCRA, 15 U.S.C. § 1681s(a)(1), the acts and practices alleged in paragraph 39 also constitute unfair or deceptive acts or practices in violation of section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

VIOLATION FOR VIOLATION OF THE FTC ACT AND FCRA



assessing monetary civil penalties under section 621 of the FCRA. Plaintiff seeks monetary civil penalties for every separate violation of the FCRA.



