

UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION

In the Matter of

FIRST AMERICAN REAL ESTATE SOLUTIONS, LLC,
a limited liability company.

DOCKET NO.

COMPLAINT

The Federal Trade Commission ("Commission"), having reason to believe that certain prior practices of First American CREDCO, Inc., a corporation, violated the provisions of the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. §§ 1681-1681u, as amended, as well as the provisions of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. 45§§, as amended, and it appearing to the Commission that this proceeding is in the public interest, alleges:

1. First American CREDCO, Inc. is incorporated in the State of Washington and has its principal office or place of business at 5625 Ruffin Road, Suite 200, San Diego, California 92123.
2. As of November 30, 1997, the consumer reporting business of First American CREDCO, Inc. was reorganized as an operating division of First American Real Estate Solutions, LLC ("respondent"). For purposes of this Complaint, "CREDCO" refers to First American CREDCO, Inc., prior to the reorganization, and to respondent after the reorganization.
3. Respondent is a limited liability company organized under the laws of California, with its principal office or place of business at 150 Second Avenue North, Suite 1600, St. Petersburg, Florida, 33701
4. CREDCO is now and has been regularly engaged in the practice of assembling or evaluating consumer credit information. CREDCO assembles or evaluates such information in order to provide "consumer reports," as defined by § 1681a(d) of the FCRA, 15 U.S.C. § 1681a(d), to third parties. Accordingly, CREDCO is a "consumer reporting agency," as defined by § 603(f) of the FCRA, 15 U.S.C. § 1681a(f).
5. The acts and practices of CREDCO alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. §

CREDCO'S COURSE OF BUSINESS

Instant Merge Reports

6. One of CREDCO's consumer reporting products is its Instant Merge Report ("IMR").

