

Love & Norris



NEW LAW: PROTECTING SURVIVORS OF TRAFFICKING

Process to Protect Survivors from Reported 'Adverse Information'

By Gregory Love and Kimberlee Norris Love & Norris, Attorneys Date: March 26, 2024

The purpose of this writing is to provide analysis of the newly enacted Section 605C of the Fair Credit Reporting Act (FCRA), and to provide guidance for Consumers and CRAs. Analysis and guidance will be broken down as follows:

Part One – New Law: the scope and purpose of the newly enacted legislation. **Part Two – The Consumer**: the process by which the Consumer may access the benefits. **Part Three – The CRA**: the CRA's obligations in receiving and processing a 'submission'.

PART ONE – NEW LAW

Effective July 25, 2022, the Consumer Financial Protection Bureau finalized a rule designed to assist sex trafficking survivors in building or rebuilding their financial stability and personal independence. The rule establishes a pathway for survivors to provide documentation to credit reporting agencies and background check providers (known as Consumer Reporting Agencies or CRAs) identifying *adverse information* stemming from their trafficking experience, and prohibiting CRAs from providing reports containing the identified adverse information.

OBSERVATION

While being trafficked, individuals commonly experience events and circumstances that give rise to criminal charges (i.e., prostitution, drug possession, fraud, theft, assault, loitering, indecent exposure), and financial failures related to actions *required* by the individual or entity trafficking the victim, such as requiring that the victim apply for multiple credit cards or loans, without intent to pay the resulting bills or repay the loans. These forced actions result in a poor payment history related to credit cards, rent or utilities attributed to the *victim*, yielding criminal and financial records known in financial and background check contexts as *adverse information*.

This adverse information presents an obstacle for the survivor in any attempt to obtain safe and affordable housing, employment, medical care, access to educational opportunities and/or student loans. Adverse information provided by background checks and credit reports effectively block a trafficking survivor's pathway to financial stability and personal independence by inhibiting access to housing, employment and other fundamental services. Denied such access, the survivor is often forced back into unhealthy dependencies and lifestyles.

LEGISLATIVE RELIEF

Acknowledging challenges faced by trafficking survivors, the Bureau enacted Section 605C of the Fair Credit Reporting Act (FCRA), providing a pathway to *block* the reporting of adverse information, thereby removing a significant barrier to financial stability and independence. Though Section 605C created a *pathway*, it did not create a *process* or the forms necessary for a trafficking survivor to pursue the relief described in the newly enacted legislation.

MinistrySafe/Abuse Prevention Systems (APS) created the processes and forms, which include video tutorials, sample forms and other instructional materials. This information is available to trafficking survivors and CRAs at <u>MinistrySafe.com/NewStart</u> and <u>AbusePreventionSystems.com/NewStart</u>.

The newly enacted code section is found at 12 CFR §1022.142 - *Prohibition on Inclusion of Adverse Information in Consumer Reporting in Cases of Human Trafficking* (see Appendix A). The obligations of the Consumer are provided in red; the obligations of the Credit Reporting Agencies (CRAs) are provided in blue.

Section 605C creates an opportunity for the trafficking survivor to have adverse information *blocked* such that the information *may not be reported* to an entity or organization seeking background information about the survivor. This section also creates submission requirements and time-sensitive obligations for CRAs.

If the process is followed correctly, a Consumer Reporting Agency (credit bureau or background check provider) may not provide a Consumer Report containing any identified adverse information about the Consumer resulting from trafficking (§1022.142(c)).

Note: Section 605C does not <u>expunge</u> the underlying records, but creates a pathway to <u>block</u> reporting of the information.

PART TWO – THE CONSUMER

The process to block adverse information is initiated by the individual subjected to trafficking – referred to as the 'Consumer.' The requirements are outlined in 12 CFR §1022.142. What follows is a description of the steps required of the Consumer to access the benefits of the newly enacted legislation.

ANTI-TRAFFICKING ORGANIZATIONS

For the individual being trafficked, breaking free from trafficking requires great courage. *After* breaking free, the trafficking survivor is heavily dependent on *others* for shelter, clothing, medical attention, counseling and other life necessities. Anti-trafficking task forces created by state, federal and tribal governments often coordinate efforts with Non-Governmental Organizations (NGOs) in the rescue and restoration of those who have been trafficked. To access the benefits of Section 605C, the Consumer will likely rely on an NGO associated with a task force.

NECESSARY STEPS

Though Section 605C became effective in July 2022, the legislation remained largely untested until the Spring of 2024. In March, MinistrySafe/APS partnered with The Net Fort Worth (an NGO associated with a trafficking task force) in an effort to serve Sandra*, a trafficking survivor in Texas.

Step One – Deep-Dive Criminal Search

The ultimate goal is to request that background check and credit history providers (CRAs) block the reporting of adverse information directly related to trafficking. On behalf of the survivor, Step One is to identify ALL criminal and negative credit records attributable to the survivor's experience while being trafficked.

In addition to providing comprehensive resources for child sexual abuse prevention to child-serving organizations (churches, camps, schools, youth sport organizations and non-profits), MinistrySafe/APS is a CRA, providing background check services in these contexts. MinistrySafe performed a deep-dive background search for Sandra and identified twenty years of criminal records and a bankruptcy – all a direct result of being trafficked. With this information, Sandra and The Net moved to Step Two: *completing the required forms*.

Step Two – Completing the Required Forms

Section 605C describes two required forms – MinistrySafe/APS created the two required forms, as well as a third form (see below).

Section 605C Self-Attestation Form

The Section 605C Self-Attestation Form includes representations from Sandra and a staff member at The Net that Sandra was, indeed, a victim of sex or human trafficking. This document attests that Sandra is a victim of trafficking, therefore entitled to the benefits available under Section 605C. See Appendix B.

This element of the process requires assistance from a representative of a task force or NGO associated with a task force. The Section 605C Self-Attestation Form memorializes the determination that a Consumer is a survivor of trafficking through a combination of (1) self-confirmation; and (2) confirmation from a representative of an entity or organization dedicated to the support of trafficking survivors. The Self-Attestation Form must be signed by the survivor (Sandra) AND a representative of one of the following:

-a federal, state or tribal governmental entity; or

-a Non-Governmental Organization (NGO) in association with a human trafficking task force.

If the Section 605C Self-Attestation Form is signed by a representative from an NGO (like The Net), the organization must be affiliated with an official task force authorized by a federal, state or tribal governmental entity. In Sandra's case, The Net is such an entity:

The Net FW is an official member of the Tarrant County 5 Stones Taskforce, a community network engaged in collaborative efforts to end sex trafficking in Tarrant County, Texas. Learn more about <u>The Net FW</u> and the <u>Tarrant County 5 Stones Taskforce</u>.

*Names have been changed to address privacy and safety concerns.

Section 605C Consumer Submission Form

The Section 605C Consumer Submission Form requests that the CRA block the reporting of all adverse information about the Consumer (stemming from trafficking) to potential employers, housing entities, banking organizations, educational admissions systems and others. See Appendix C. The Consumer Submission Form should list all adverse information the Consumer seeks to block, including all criminal records, eviction records, negative financial references, and other information related to or resulting from the Consumer's trafficking experience: in other words, all criminal and negative credit information revealed in the deep-dive background check referenced above in Step One. The Consumer Submission Form should be accompanied by Proper Identification.

NGO Task Force Affiliation Form

The third form, the NGO Task Force Affiliation Form, constitutes a representation from the NGO that it is, in fact, a Non-Governmental Organization in association with an official trafficking task force created by a federal, state or tribal government. See Appendix D.

Step Three – Submitting the Forms

Under federal law, all CRAs are required to create a portal or intake system for Consumers (trafficking survivors) to submit the above-referenced forms. With help from The Net and MinistrySafe, Sandra submitted the forms to all three credit reporting entities: Equifax, Experian and TransUnion. As a result, *Sandra's bankruptcy is no longer reported*.

A criminal background check was required as one of the conditions of her housing application. The particular criminal background check CRA was identified, and the above-referenced forms were submitted. When Sandra's background check was run, her criminal history reported 'no reportable records found'. *All 27 criminal convictions were blocked*.

The process worked, and Sandra has moved into a new apartment; her pathway to restoration is no longer blocked.

Sample Completed Forms

A mocked-up deep-dive criminal background check, as well as samples of the completed Consumer Submission Form, Self-Attestation Form and NGO Task Force Affiliation Form, can be accessed at <u>MinistrySafe.com/NewStart</u> or <u>AbusePreventionSystems.com/NewStart</u>.

Best Practice:

Before creating the Consumer Submission Letter, the trafficking survivor should obtain a thorough background check report identifying *all existing adverse information* – both criminal and financial. This exhaustive report provides the list recreated in the Consumer Submission Form, wherein the Consumer requests that the CRA block the reporting of *listed* adverse information.

MinistrySafe/APS provides a deep-dive background check to NGOs assisting trafficking survivors seeking relief under Section 605C. For information, contact <u>MinistrySafe</u> or <u>Abuse</u> <u>Prevention Systems</u>.

SUMMARY – CONSUMER

FCRA Section 605C created a pathway for trafficking survivors, but no process. MinistrySafe/Abuse Prevention Systems has developed a process and forms whereby trafficking survivors and their advocates may pursue *restoration* following *rescue*, and the attached sample forms have been utilized successfully.

PART THREE – THE CRA

Many CRAs are unaware of the passage of Section 605C or its resulting requirements and obligations. A brief outline of CRA obligations under the new federal law is provided below, including required timeframes within which to respond.

SUBMISSION PROCESS

Under the new law, CRAs are required to provide information to Consumers on publicly available websites describing the process for submission for the blocking of adverse information. (See $\frac{1022.142(d)}{10}$).

If not already established, CRAs must immediately create a process for receiving and processing Section 605C Submissions.

Note:

The Fair Credit Reporting Act is a Consumer Protection Law. Under Section 605C, the trafficking survivor is a 'Consumer' – see 1022.142(b)(6)(i)(A). Though untested, the penalties and fines associated with violations of this section should not be underestimated.

Until each CRA is compliant with this requirement, it may be necessary for the survivor to contact the CRA in order to request information related to Submission of the above-referenced forms.

TIME-SENSITIVE OBLIGATIONS

Upon receipt of the above-referenced forms, the CRA has time-sensitive obligations. It is important for the CRA's submission process to date receipt of the Consumer's Submission.

Block the Report of Adverse Information – Four Days

CRAs have four business days from receipt of the Consumer's Submission to block the identified adverse information from appearing in a Consumer Report (\$1022.142(e)(1)).

Help the Consumer Resolve Deficiencies in Submission - Five Days

CRAs have five business days to notify the Consumer in an attempt to resolve deficiencies in the Consumer's Submission (\$1022.142(e)(2)(i)). In the event it is necessary for the CRA to contact the Consumer to request additional information to confirm identity or cure a defect in the Submission, the CRA must make the request within five days of submission.

Note that the CRA (1) may **not** question or seek validity of the assertions of trafficking; and (2) cannot question whether the adverse information the survivor is seeking to block was related to trafficking.

A Consumer Reporting Agency may **not**, however, ask for information on the validity of the facts or circumstances detailed in the contents of the submitted trafficking documentation establishing the Consumer is a victim of trafficking or whether the identified adverse information resulted from a severe form of trafficking in persons or sex trafficking under paragraph (b)(6) of this section. See 1022.142(e)(2).

The CRA may, however, verify the legitimacy of the NGO and its affiliation with a Trafficking Task Force.

Deadline to Complete Actions – Twenty-Five Days

CRAs have no more than 25 days after receiving the Consumer's Submission to determine whether the Submission is complete and then make a final determination (§1022.142(e)(2)(ii)). In the event it is necessary for the CRA to reach out to the Consumer to confirm identity or resolve a Submission deficiency, all actions must be completed within 25 days from submission. In short, CRAs cannot drag out the process.

Notify the Consumer Regarding Actions Taken – Five Days

The CRA is required to notify the Consumer of actions performed in response to the Submission no later than five business days after its final determination related to the Consumer's Submission (§1022.142(f)).

POLICIES & PROCEDURES

Each CRA must establish and maintain written policies to ensure and monitor compliance with 12 CFR §1022.142 (§1022.142(h)).

RECORD RETENTION

CRAs are required to retain records for seven years related to Consumer Submissions and actions taken in compliance with 12 CFR §1022.142 (§1022.142(g)).

SUMMARY – CRA

The goal of Section 605C is to assist trafficking survivors in building or rebuilding their financial stability and personal independence. Given that the Fair Credit Reporting Act (FCRA) is a Consumer Protection Law, the strength and impact of §1022.142(e)(2) cannot be overstated. CRAs must use great care in correctly processing Section 605C block requests, and do so within the time limits provided by §§1022.142(e) and (f).

Kimberlee Norris and Gregory Love *are partners in the Fort Worth, Texas law firm of Love & Norris* and founders of <u>MinistrySafe</u>, <u>Abuse Prevention Systems</u> and <u>Protecting Vulnerable Adults</u>, providing sexual abuse expertise to organizations and ministries worldwide. After representing victims of child sexual abuse for more than two decades, Love and Norris saw recurring, predictable patterns in predatory behavior. MinistrySafe, Abuse Prevention Systems and Protecting Vulnerable Adults grew out of their desire to place proactive tools into the hands of ministries and organizations serving children and vulnerable populations.

Love and Norris teach the only graduate-level course on 'Preventing Sexual Abuse in Ministry Contexts' as Visiting Faculty at Dallas Theological Seminary.

APPENDIX A

12 CFR §1022.142 - Prohibition on inclusion of adverse information in consumer reporting in cases of human trafficking.

§1022.142 Prohibition on inclusion of adverse information in consumer reporting in cases of human trafficking.

(a) *Scope.* This section applies to any consumer reporting agency as defined in section 603(f) of the FCRA, 15 U.S.C. 1681a(f).

(b) *Definitions.* For purposes of this section:

(1) *Appropriate proof of identity* means proof of identity that meets the requirements in §1022.123, for purposes of section 605C of the FCRA.

(2) *Consumer report* has the meaning provided in section 603(d) of the FCRA, 15 U.S.C. 1681a(d).

(3) *Consumer reporting agency* has the meaning provided in section 603(f) of the FCRA, 15 U.S.C. 1681a(f).

(4) *Severe forms of trafficking in persons* has the meaning provided in section 103 of the Trafficking Victims Protection Act of 2000, 22 U.S.C. 7102(11).

(5) *Sex trafficking* has the meaning provided in section 103 of the Trafficking Victims Protection Act of 2000, as amended by section 108 of the Justice for Victims of Trafficking Act of 2015, 22 U.S.C. 7102(12).

(6) *Trafficking documentation* means one or more documents that satisfy paragraphs (b)(6)(i) and (ii) of this section:

(i) Victim determination. Documentation that:

(A) Is of a determination that a consumer is a victim of trafficking made by a:

(1) Federal, State, or Tribal governmental entity; or

(2) Non-governmental organization or members of a human trafficking task force, including victim service providers affiliated with the organization or task force, authorized by a Federal, State, or Tribal governmental entity to make such a determination;

(B) Is of a determination that a consumer is a victim of trafficking made by a court of competent jurisdiction or determination consisting of documents filed in a court of competent jurisdiction where a central issue in the case is whether the consumer is a victim of trafficking and the court has, at a minimum, affirmed the consumer's claim either by accepting certain pieces of evidence which are assumed to be true or finding that the there is no genuine dispute as to any material fact supporting a judgment in favor of the victim as a matter of law; or

(C) Is of a signed statement by the consumer attesting that the consumer is a victim of trafficking if such statement or an accompanying document is signed or certified by a representative of an entity described in paragraph (b)(6)(i)(A) or (B) of this section.

(ii) *Identified adverse items of information.* Documentation, which may consist of a statement prepared by the consumer or by any designated representative on behalf of a consumer (except for a credit repair organization as defined in section 403(3) of the Credit Repair Organizations Act, 15 U.S.C. 1679a(3), or an entity that would be a credit repair organization, but for section 403(3)(B)(i) of the Credit Repair Organizations Act, 15 U.S.C. 1679a(3)(B)(i) of the Credit Repair Organizations Act, 15 U.S.C. 1679a(3)(B)(i) of the Credit Repair Organizations Act, 15 U.S.C. 1679a(3)(B)(i), that:

(A) Identifies any items of adverse information that should not be furnished by a consumer reporting agency because the items resulted from a severe form of trafficking in persons or sex trafficking of which the consumer is a victim; and

(B) Must contain a preferred method for a consumer reporting agency to contact the consumer electronically or in writing such as an email address or physical address where mail can be received. A consumer reporting agency shall use only the consumer's preferred method of contact for communications under paragraphs (d), (e), and (f) of this section about the consumer's submission and shall not use the consumer's preferred contact information for any other purpose.

(7) *Victim of trafficking* means a person who is a victim of a severe form of trafficking in persons or sex trafficking.

(c) *Prohibition on inclusion of adverse information of trafficking victims.* A consumer reporting agency may not furnish a consumer report containing any adverse item of information about a consumer that resulted from a severe form of trafficking in persons or sex trafficking if the consumer has provided trafficking documentation as defined under paragraph (b)(6) of this section to the consumer reporting agency.

(d) *Method of submission to consumer reporting agencies*—(1) *Mailing and website address*. A consumer reporting agency must provide two mailing addresses for a consumer or consumer representative, as described in paragraph (b)(6)(ii) of this section, to send a submission consisting of an appropriate proof of identification under paragraph (b)(1) of this section and trafficking documentation under paragraph (b)(6) of this section. A consumer reporting agency may also establish a secure online website portal for a consumer to upload a submission. A consumer reporting agency must accept a submission sent to the mailing and, if applicable, website address used for disputes under section 611 of the FCRA, and must accept a submission sent to a mailing and, if applicable, website address dedicated to blocking adverse items of information resulting from a severe form of trafficking in persons or sex trafficking under this section.

(2) *Disclosing methods for submission.* A consumer reporting agency must add information on its publicly available website stating how submissions for the blocking of adverse items of information resulting from a severe form of trafficking in persons or sex trafficking should be provided to a consumer reporting agency.

(3) *Toll-free telephone number.* A consumer reporting agency that compiles and maintains files on consumer on a nationwide basis, as defined in section 603(p) of the FCRA, 15 U.S.C. 1681a(p), must:

(i) Allocate a reasonable amount of personnel to respond to consumer inquiries about the process for and status of a consumer's submission at the toll-free telephone number used for disputes under section 611 of the FCRA; and

(ii) Establish a toll-free telephone number dedicated to addressing submissions from consumer seeking to block adverse items of information resulting from a severe form of trafficking in persons or sex trafficking under this section.

(e) Block of adverse information resulting from trafficking—

(1) *Block upon receipt of the submission.* Except as otherwise provided in this section, within four business days of receipt of the consumer's submission under paragraph (d)(1) of this section, a reporting agency must block the reporting of any adverse item of information identified by the (or their representative) as resulting from a severe form of trafficking in persons or sex trafficking.

(2) Requirement to notify the consumer and attempt to resolve deficiencies— (i) In general. Within five business days of receipt of the consumer's submission under paragraph (d) of this section, a consumer reporting agency must notify a consumer if additional information is necessary for the purpose of completing the submission and attempt to resolve any deficiency in the consumer's submission. A consumer reporting agency may only request additional information where the consumer reporting agency cannot reasonably confirm the appropriate proof of identity under paragraph (b)(1) of this section for the consumer or, if applicable, the consumer's representative, the consumer did not provide victim determination documentation under paragraph (b)(6)(i) of this section, or the consumer reporting agency cannot properly identify the adverse items of information under paragraph (b)(6)(ii) of this section. A consumer reporting agency may not, however, ask for information on the validity of the facts or circumstances detailed in the contents of the submitted trafficking documentation establishing the consumer is a victim of trafficking or whether the identified adverse information resulted from a severe form of trafficking in persons or sex trafficking under paragraph (b)(6) of this section.

(ii) *Timing of final determination.* A consumer reporting agency must make a final determination on the consumer's submission no later than 25 business days after receiving the submission provided in paragraph (d)(1) of this section.

(3) *Final determination of the block.* Upon confirming completion of the submission from the consumer under paragraph (d)(1) of this section and in accordance with the requirements under paragraph (e)(2) of this section, the consumer reporting agency must initiate or maintain the action described in paragraph (e)(1) of this section by blocking the reporting of the items of adverse information on the consumer.

(4) Authority to decline or rescind a block. A consumer reporting agency may decline to block, or may rescind any block of, adverse items of information resulting from a severe form of trafficking in persons or sex trafficking, in accordance with the timing requirements under paragraph (e)(2)(ii) of this section, only where the consumer reporting agency cannot reasonably confirm the appropriate proof of identity under paragraph (b)(1) of this section for the consumer, and, if applicable, the consumer's representative, the consumer cannot provide documentation consisting of a victim determination under paragraph (b)(6)(i) of this section, or the consumer reporting agency cannot properly identify the adverse items of information under paragraph (b)(6)(ii) of this section. A consumer reporting agency may not, however, decline to block or rescind any block of adverse information identified by the consumer or if applicable, the consumer's representative, based on the validity of the facts or circumstances detailed in the contents of the submitted trafficking documentation as defined in paragraph (b)(6) of this section. A consumer reporting agency may decline or rescind a block only after notifying the consumer using the method of contact specified by the consumer in paragraph (b)(6)(ii)(B) of this section and attempting to resolve any deficiency in the consumer's submission as required in paragraph (e)(2) of this section.

(f) Notification to consumer of actions taken in response to the consumer's *submission*—(1) *In general.* A consumer reporting agency must provide written or electronic notice to a consumer of actions performed in response to a consumer's submission no later than five business days after a final determination on a consumer's submission under paragraph (e)(3) of this section (or, if rescinding a previously applied block, five business days after rescinding under paragraph (e)(4) of this section). The consumer reporting agency must use the method of contact specified by the consumer in paragraph (b)(6)(ii)(B) of this section.

(2) *Contents.* The notice must include the following:

(i) A statement that the review of the submission is completed;

(ii) A statement of the outcome of the submission, including the reason(s) if the consumer reporting agency declined to block the adverse information identified by the consumer, or rescinded such a block, under paragraph (e)(4) of this section;

(iii) A consumer report, provided at no cost to the consumer, that is based upon the consumer's revised file (if applicable) as a result of the consumer's submission;

(iv) A description of the procedure used to determine the outcome;

(v) A method for contacting the consumer reporting agency to appeal the determination or revise the submission to cure any of the noted reasons for declining to block the adverse information identified by the consumer; and

(vi) The web page consumers can use to submit complaints to the Consumer Financial Protection Bureau.

(g) **Record retention.** For a period of seven years after the consumer's submission is received at the mailing or website address made available under paragraph (d)(1) of this section, a consumer reporting agency must retain evidence of all such submissions and compliance with this section, including the actions taken by the consumer reporting agency under paragraphs (e)(1) through (e)(3), and (f) of this section and the reasons provided under paragraph (e)(4) of this section for declining to block or rescinding any block of items of adverse information identified by the consumer.

(h) *Policies and procedures to ensure and maintain compliance.* A consumer reporting agency must establish and maintain written policies and procedures reasonably designed to ensure and monitor the compliance of the consumer reporting agency and its employees with the requirements of the paragraphs in this section. These written policies and procedures must be appropriate to the nature, size, complexity, and scope of the activities of the consumer reporting agency and its employees.

[87 FR 37723, June 24, 2022 ... Rule Effective July 25, 2022]

APPENDIX B

FCRA Section 605C Self-Attestation Form

Human Trafficking Victim Determination Documentation

Survivor's Full Legal	Name:				
Social Security Numb	er:	Date of Birth:			
I attest that I am a victim of trafficking for purposes of Section 605C of the Fair Credit Reporting Act (FCRA).					
Under penalty of per correct, to the best c		ify, verify or state) that the foregoing is tru	ie and		
Survivor's Signature:		Date:			
To be completed by Regulations) §1022.		horized pursuant to 12 CFR (Code of F	ederal		
Contact Information	for NGO or Anti-T	Trafficking Task Force:			
Organization:					
City:					
County:					
State:					

Representative:	
Position:	
Email:	
Phone:	

I serve with an organization providing services to victims of trafficking, and I attest that the above referenced individual is a victim of trafficking for purposes of Section 605C of the FCRA.

Under penalty of perjury, I declare (certify, verify or state) that the foregoing is true and correct, to the best of my knowledge.

Authorized Personnel Signature: _____ Date: _____

APPENDIX C

FCRA Section 605C Consumer Submission

Human Trafficking – Request to Block Adverse Information

Date: MM/DD/YYYY Full Name: FIRST, MIDDLE, LAST DOB: MM/DD/YYYY SSN: XXX-XX-XXXX Address: STREET CITY, STATE ZIP

RE: Section 605C Trafficking Block Request

To whom it may concern,

I am a survivor of Human Trafficking. The adverse information listed below, which may appear (or currently appears) on a Consumer Report or Background Check, is the result of Trafficking:

Financial

Equifax:

Public Record: NAME OF PUBLIC RECORD IF APPLICABLE

Date Filed: DATE AS LISTED ON YOUR CREDIT REPORT

- Creditor: NAME OF CREDITOR AS LISTED ON YOUR CREDIT REPORT
 Date Reported: DATE AS LISTED ON YOUR CREDIT REPORT
 Current Status: AS LISTED ON YOUR CREDIT REPORT
- Creditor: NAME OF CREDITOR AS LISTED ON YOUR CREDIT REPORT
 Date Reported: DATE AS LISTED ON YOUR CREDIT REPORT
 Current Status: AS LISTED ON YOUR CREDIT REPORT
- Creditor: NAME OF CREDITOR AS LISTED ON YOUR CREDIT REPORT
 Date Reported: DATE AS LISTED ON YOUR CREDIT REPORT
 Current Status: AS LISTED ON YOUR CREDIT REPORT

TransUnion:

- Public Record: NAME OF PUBLIC RECORD IF APPLICABLE
 Date Filed: DATE AS LISTED ON YOUR CREDIT REPORT
- Creditor: NAME OF CREDITOR AS LISTED ON YOUR CREDIT REPORT
 Date Reported: DATE AS LISTED ON YOUR CREDIT REPORT
 Current Status: AS LISTED ON YOUR CREDIT REPORT

Experian:

- Public Record: NAME OF PUBLIC RECORD IF APPLICABLE
 Date Filed: DATE AS LISTED ON YOUR CREDIT REPORT
- Creditor: NAME OF CREDITOR AS LISTED ON YOUR CREDIT REPORT
 Date Reported: DATE AS LISTED ON YOUR CREDIT REPORT
 Current Status: AS LISTED ON YOUR CREDIT REPORT
- Creditor: NAME OF CREDITOR AS LISTED ON YOUR CREDIT REPORT
 Date Reported: DATE AS LISTED ON YOUR CREDIT REPORT
 Current Status: AS LISTED ON YOUR CREDIT REPORT

Criminal

Name of County County, State:

- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)

Name of County County, State:

- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)

Name of County County, State:

- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)
- Case Number (Crime)(Misdemeanor or Felony)(Approx. Date of Offense)

Driving Records

Driver's License State: STATE

- OFFENSE (APPROX. DATE OF OFFENSE)

Pursuant to 605C of the Fair Credit Reporting Act, I respectfully request that you block the reporting of the above adverse information (and any other information related thereto) within four business days (see 12 CFR §1022.142(e)(1)). In addition, please send me notification of the action taken pursuant to this request within five business days (see 12 CFR §1022.142(f)).

My preferred method of contact: (select your preferred method)

- 🗆 Email
- Mail
- □ Phone
- □ Please contact my Advocate on my behalf

My representative's information: (Optional)

Representative Name:	REPRESENTATIVE'S NAME
Representative Email:	REPRESENTATIVE'S EMAIL
Representative Phone:	REPRESENTATIVE'S PHONE NUMBER

Sincerely,

YOUR NAME HERE

ENCLOSURES

- Proof of Identity (attached): (select method attached to this letter)
 - Driver's License
 - □ State-Issued ID Card
 - Passport
 - Other:
- Trafficking Documentation:

[YOUR NAME] FCRA Section 605C Self-Attestation Form (attached)

APPENDIX D

FCRA Section 605C Task Force Affiliation

Human Trafficking – Victim Determination Documentation

The Organization referenced below serves as a Non-Governmental Organization (NGO) affiliated with a human trafficking Task Force authorized by a State or Federal governmental entity. As contemplated by 12 CFR §1022.142(b)(6)(i)(a)(2), the NGO named below is qualified and authorized to create Victim Determination documentation.

Date:

NON-GOVERNMENTAL ORGANIZATION

Organization:	
City:	
County:	
State:	
Representative:	
Position:	
Email:	
Phone:	

HUMAN TRAFFICKING TASK FORCE

Organization:	
City:	
County:	
State:	
Representative:	
Position:	
Signature:	
Email:	
Phone:	

Description/Bio of Task Force: