UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, Plaintiff, v. RENTGROW, INC., a Delaware Corporation, Defendant.	**Case No.: 1:26-cv-2415** **CONSENT MOTION FOR ENTRY OF PROPOSED STIPULATED ORDER FOR PERMANENT INJUNCTION AND CIVIL PENALTY JUDGMENT**

Plaintiff, the United States of America, respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 7(b)(1) and Local Civil Rule 7(a), for Entry of a Proposed Stipulated Order for Permanent Injunction and Civil Penalty Judgment.

Points and Authorities in Support of Motion

1. On July 9, 2026, the United States, acting upon notification and referral to the Attorney General by the Federal Trade Commission ("FTC"), filed a Complaint for Permanent Injunction, Civil Penalty Judgment, and Other Relief against RentGrow, Inc., ("RentGrow" or "Defendant") alleging violations of Section 5(a) of the FTC Act ("FTC Act"), 15 U.S.C. § 45(a), and the Fair Credit Reporting Act (the "FCRA"), 15 U.S.C. §§ 1681-1681x. (ECF No. 1, Complaint, ¶ 1).

2. The Complaint contains four counts against RentGrow. The counts allege that in connection with furnishing background reports to assist landlords and property managers in selecting rental tenants, Defendant failed to use reasonable procedures to assure maximum possible accuracy of the information it reports (*Id.*, ¶¶ 63-64); Defendant failed to disclose to consumers upon request certain information contained in the consumers' files or the sources of such information (*Id.*,

¶¶ 65-66); Defendant failed to comply with required procedures for resellers in the case of disputed accuracy of tenant screening reports (*Id.*, ¶¶ 67-68); and Defendant deceptively represented, directly or indirectly, expressly or by implication, that property managers had been notified of post-dispute changes to consumers' tenant screening reports (*Id.*, ¶¶ 69-71), in violation of Sections 607(b), 609(a), and 611 of the FCRA and Section 5(a) of the FTC Act. *See* 15 U.S.C. §§ 1681-1681x; 15 U.S.C. § 45(a).

3. For these alleged violations, the Complaint seeks relief, including a permanent injunction, civil penalties, and other relief, under Section 621(a)(2)(A) of the FCRA, 15 U.S.C. § 1681s(a)(2)(A).

4. In March 2026, RentGrow agreed to resolve the allegations in the Complaint under the terms and conditions of the Proposed Stipulated Order.

5. The Proposed Stipulated Order includes injunctive relief to deter future violations of the FTC Act and FCRA. Section I would require Defendant to maintain reasonable procedures to ensure maximum possible accuracy of information in Consumer Reports, require Defendant to disclose certain information in response to consumer requests, and enjoin Defendant from misrepresenting the extent to which landlords and property managers are informed of changes to disputed information in Consumer Reports. (Proposed Stipulated Order, ¶ I.A.-D.). Section II would require RentGrow to pay a civil penalty of $2.25 million to the Treasurer of the United States within 7 days of entry of the Order. (*Id.*, ¶ II). Section III would provide additional monetary provisions to ensure payment of this monetary penalty. (*Id.*, ¶ III). Section IV would require RentGrow to obtain acknowledgements from all officers and certain managers. (*Id.*, ¶ IV). Section V would require RentGrow to submit a compliance report one year after the Stipulated Order is entered. (*Id.*, ¶ V). Section VI would require RentGrow to create and maintain records to demonstrate compliance with the Stipulated Order. (*Id.*, ¶ VI). Section VII

would authorize the FTC and Department of Justice to request additional compliance monitoring reports and permit the FTC and the Department of Justice to conduct civil discovery into RentGrow's compliance. (*Id.*, ¶ VII). Section VIII would terminate the Stipulated Order after 10 years. (*Id.*, ¶ VIII). Finally, Section IX would provide that the Court retain jurisdiction under the Stipulated Order. (*Id.*, ¶ IX).

6. As part of the settlement, RentGrow has waived service of the Complaint and further agreed to the Court's entry of the Proposed Stipulated Order. (*Id*., at PDF pg.1).

7. The United States and RentGrow (collectively "the Parties") and their counsel agree this Court should retain jurisdiction over this matter for purposes of construction, modification, and enforcement of the Proposed Stipulated Order. (*Id*., ¶ IX).

8. The Parties further agree that each Party shall bear its own cost for this action and waive all rights to appeal or otherwise challenge or contest the validity of the Proposed Stipulated Order. (*Id*., ¶ 4).

9. Representatives of RentGrow and the United States have signed the Proposed Stipulated Order's signature pages (*Id.*, at PDF pg. 15) and stipulate to the Court's entry of the Proposed Stipulated Order. (*Id*. at PDF pg. 1).

10. This Court has the power to enter the Proposed Stipulated Order without first determining whether a statutory violation has occurred. *See Citizens for a Better Env't v. Gorsuch*, 718 F.2d 1117, 1125-26 (D.C. Cir. 1983). Its duty is only to satisfy itself of the settlement's "overall fairness to beneficiaries and consistency with the public interest." *Id*. (citing *United States v. Trucking Emps., Inc.*, 561 F.2d 313, 317 (D.C. Cir. 1977). In approving and entering the Proposed Stipulated Order, this Court "need not inquire into the precise legal rights of the parties nor reach and resolve the merits of the claims or controversy." *In re Idaho*

Conservation League, 811 F.3d 502, 515 (D.C. Cir. 2016) (quoting *Metro. Hous. Dev. Corp. v. Vill. Of Arlington Heights*, 616 F.2d 1006, 1014 (7th Cir. 1980)). Rather, this Court "need only determine that the settlement is fair, adequate, reasonable, and appropriate under the particular facts and that there has been a valid consent by the concerned parties." *Id.*

11. The Proposed Stipulated Order is fair, adequate, reasonable, and appropriate. As described above, the Proposed Stipulated Order includes injunctive relief designed to prevent future legal violations and protect RentGrow customers. The Order reflects fairness to the parties because it would enable the United States to protect tenants and landlords, which is in the public interest.

12. The Proposed Stipulated Order is also consistent with the government's broad discretion to determine the most advantageous form for securing negotiated relief. *See United States v. Fokker Servs. B.V.*, 818 F.3d 733, 744 (D.C. Cir. 2016) (consent orders should be reviewed by the district court in a manner that "avoid[s] encroaching on the Executive's core discretion over enforcement decisions"). By its terms, the Proposed Stipulated Order would avoid a "protracted examination of the parties' legal rights," which would benefit both the parties and the public by "saving [] time and money that results from the voluntary settlement of litigation." *Citizens for a Better Env't*, 718 F.2d at 1126. Finally, the Proposed Stipulated Order reflects good faith negotiations by the parties, and each has provided their valid consent as described above in Paragraph 7.

Conclusion

For the forgoing reasons, the United States respectfully requests that the Court sign the Proposed Stipulated Order and enter it as the judgment of the Court in this action.

Respectfully submitted,

DATED: July 9, 2026

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, Plaintiff, v. RENTGROW, INC., a Delaware Corporation, Defendant.	**Case No.: 1:26-cv-2415** **[PROPOSED] STIPULATED ORDER FOR PERMANENT INJUNCTION AND CIVIL PENALTY JUDGMENT**

Plaintiff, the United States of America, acting upon notification from the Federal Trade Commission ("Commission" or "FTC"), filed its Complaint for Permanent Injunction and Civil Penalty Judgment ("Complaint"), for a permanent injunction, civil penalties, and other relief in this matter, pursuant to Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b), and Section 621(a) of the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681s(a). Defendant has waived service of the summons and the Complaint. Plaintiff and Defendant stipulate to the entry of this Stipulated Order for Permanent Injunction and Civil Penalty Judgment ("Order") to resolve all matters in dispute in this action between them.

THEREFORE, IT IS ORDERED as follows:

FINDINGS

1. This Court has jurisdiction over this matter.

2. The Complaint charges that Defendant participated in deceptive and unfair acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45, and the FCRA, 15 U.S.C. §§ 1681–1681x, in the sale of Tenant Screening Reports.

3. Defendant neither admits nor denies any of the allegations in the Complaint, except as specifically stated in this Order. Only for purposes of this action, Defendant admits to

the facts necessary to establish jurisdiction.

4. Defendant waives any claim that it may have under the Equal Access to Justice Act, 28 U.S.C. § 2412, concerning the prosecution of this action through the date of this Order, and agrees to bear its own costs and attorney fees.

5. Defendant and Plaintiff waive all rights to appeal or otherwise challenge or contest the validity of this Order.

DEFINITIONS

For the purpose of this Order, the following definitions apply:

A. "**Consumer Report**" means any written, oral, or other communication of any information by a Consumer Reporting Agency bearing on a consumer's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living which is used or expected to be used or collected in whole or in part for a Permissible Purpose.

B. "**Consumer Reporting Agency**" means any person which, for monetary fees, dues, or on a cooperative nonprofit basis, regularly engages in whole or in part in the practice of assembling or evaluating consumer credit information or other information on consumers for the purpose of furnishing Consumer Reports to third parties, and which uses any means or facility of interstate commerce for the purpose of preparing or furnishing Consumer Reports.

C. "**Consumer's File**" means, when used in connection with information on any consumer, all of the information on that consumer recorded and retained by a Consumer Reporting Agency regardless of how the information is stored.

D. "**Defendant**" means RentGrow, Inc., a Delaware corporation, and its successors and assigns.

E. "**Permissible Purpose**" means:

1. In response to the order of a court having jurisdiction to issue such an order, or a subpoena issued in connection with proceedings before a Federal grand jury; or
2. In accordance with the written instructions of the consumer to whom it relates; or
3. To a person which the Consumer Reporting Agency has reason to believe:
    a) intends to use the information in connection with a credit transaction involving the consumer on whom the information is to be furnished and involving the extension of credit to, or review or collection of an account of, the consumer; or
    b) intends to use the information for employment purposes; or
    c) intends to use the information in connection with the underwriting of insurance involving the consumer; or
    d) intends to use the information in connection with a determination of the consumer's eligibility for a license or other benefit granted by a governmental instrumentality required by law to consider an applicant's financial responsibility or status; or
    e) intends to use the information, as a potential investor or servicer, or current insurer, in connection with a valuation of, or an assessment of the credit or prepayment risks associated with, an existing credit obligation; or
    f) otherwise has a legitimate business need for the information:

i. in connection with a business transaction that is initiated by the consumer; or

ii. to review an account to determine whether the consumer continues to meet the terms of the account; or

g) executive departments and agencies in connection with the issuance of government-sponsored individually-billed travel charge cards; or

4. In response to a request by the head of a State or local child support enforcement agency (or a State or local government official authorized by the head of such an agency), if the person making the request certifies to the Consumer Reporting Agency that:

a) the Consumer Report is needed for the purpose of establishing an individual's capacity to make child support payments, determining the appropriate level of such payments, or enforcing a child support order, award, agreement, or judgment;

b) the parentage of the consumer for the child to which the obligation relates has been established or acknowledged by the consumer in accordance with State laws under which the obligation arises (if required by those laws); and

c) the Consumer Report will be kept confidential, will be used solely for a purpose described in subparagraph (a), and will not be used in connection with any other civil, administrative, or criminal proceeding, or for any other purpose; or

5. To an agency administering a State plan under section 654 of title 42 for use to set an initial or modified child support award; or
6. To the Federal Deposit Insurance Corporation or the National Credit Union Administration as part of its preparation for its appointment or as part of its exercise of powers, as conservator, receiver, or liquidating agent for an insured depository institution or insured credit union under the Federal Deposit Insurance Act or the Federal Credit Union Act, or other applicable Federal or State law, or in connection with the resolution or liquidation of a failed or failing insured depository institution or insured credit union, as applicable.

F. "**Reseller Dispute Requirement**" means, upon receiving a notice from a consumer of a dispute concerning the completeness or accuracy of any item of information contained in a Consumer Report on such a consumer produced by Defendant, that Defendant shall, within 5 (five) business days of receiving the notice, and free of charge:

1. Determine whether the item of information was incomplete or inaccurate as a result of an act or omission of Defendant, and
2. (A) if Defendant determines that the item of information was incomplete or inaccurate as a result of an act or omission of Defendant, correct the information in the Consumer Report or delete it not later than 20 days after receiving the notice; or (B) if Defendant determines that the item of information is not incomplete or inaccurate as a result of an act or omission of Defendant, convey the notice of the dispute, together with all relevant information provided by the consumer, to each Consumer Reporting Agency

that provided Defendant with the information that is the subject of the dispute, using an address or a notification mechanism specified by the Consumer Reporting Agency for such notices.

G. "**Tenant Screening Report**" means a Consumer Report provided for rental tenant screening purposes that incorporates or includes public records such as eviction proceeding information or criminal record information, or otherwise reflects a search for public record information.

ORDER

I. PROHIBITED BUSINESS ACTIVITIES

IT IS ORDERED that Defendant, Defendant's officers, agents, employees, and attorneys, and all other persons in active concert or participation with any of them, who receive actual notice of this Order, whether acting directly or indirectly, in connection with operating as a Consumer Reporting Agency, are permanently restrained and enjoined from:

A. Failing to maintain reasonable procedures to assure maximum possible accuracy of the information concerning the individual about whom a Consumer Report relates, including reasonable procedures designed to:

1. Prevent the inclusion of multiple event filings for the same criminal or eviction proceeding; and
2. Prevent the reporting of a criminal or eviction proceeding more than once on a Tenant Screening Report, whether or not the record is enumerated as a separate record;

B. Failing to, upon receiving a request for a Consumer's File, clearly and accurately disclose to the consumer any vendor, including, but not limited to, LexisNexis Accurint, used by

Defendant as a source of address history or middle name data, and disclose the categories of data from that vendor that Defendant used or may have used to prepare the consumer's Tenant Screening Report;

C. Failing to maintain reasonable procedures, including regularly monitoring, documenting, and correcting those procedures as needed, to comply with the Reseller Dispute Requirement as it relates to (i) criminal or eviction proceeding records that were updated after the original screening date, and (ii) the reporting of multiple records, or multiple events for the same record, for criminal and eviction proceedings; and

D. Misrepresenting to consumers whether and to what extent rental housing providers, including landlords and property managers, have been notified that a consumer's Tenant Screening Report has been updated following a consumer dispute that resulted in changes to the disputed information on a consumer's Tenant Screening Report when the screening result did not change.

II. MONETARY JUDGMENT

IT IS FURTHER ORDERED that:

A. Judgment in the amount of two million two hundred fifty thousand dollars ($2,250,000) is entered in favor of Plaintiff against Defendant, as a civil penalty.

B. Defendant is ordered to pay to Plaintiff, by making payment to the Treasurer of the United States, two million two hundred fifty thousand dollars ($2,250,000), which, as Defendant stipulates, its undersigned counsel will hold in escrow for no purpose other than payment to Plaintiff. Such payment must be made within 7 days of entry of this Order by electronic fund transfer in accordance with instructions previously provided by a representative of Plaintiff upon the Court's issuance of this Order.

III. ADDITIONAL MONETARY PROVISIONS

IT IS FURTHER ORDERED that:

A. Defendant relinquishes dominion and all legal and equitable right, title, and interest in all assets transferred pursuant to this Order and may not seek the return of any assets.

B. The facts alleged in the Complaint will be taken as true, without further proof, in any subsequent civil litigation by or on behalf of the Commission to enforce its rights to any payment or monetary judgment pursuant to this Order.

C. Defendant acknowledges that Defendant's Employer Identification Number, Social Security Number, or other Taxpayer Identification Numbers ("TIN"), including all TINs that Defendant previously provided, may be used by the Commission and Plaintiff for reporting and other lawful purposes, including collecting on any delinquent amount arising out of this Order in accordance with 31 U.S.C. § 7701.

IV. ORDER ACKNOWLEDGMENTS

IT IS FURTHER ORDERED that Defendant obtains acknowledgments of receipt of this Order:

A. Defendant, within 7 days of entry of this Order, must submit to the Commission an acknowledgment of receipt of this Order sworn under penalty of perjury.

B. For 5 years after entry of this Order, Defendant must deliver a copy of this Order to: (1) all principals, officers, and directors, and LLC managers and members; (2) all of Defendant's employees having managerial responsibilities for conduct related to the subject matter of the Order, all employees of Defendant's parent company having managerial responsibilities for conduct related to the subject matter of the Order or acting in concert with or participating in Defendant's activities related to the subject matter of the Order, and all agents

and representatives who participate in conduct related to the subject matter of the Order; and (3) any business entity resulting from any change in structure as set forth in the Section titled Compliance Reporting. Delivery must occur within 7 days of entry of this Order for current personnel. For all others, delivery must occur before they assume their responsibilities.

C. From each individual or entity to which Defendant delivered a copy of this Order, Defendant must obtain, within thirty (30) days, a signed and dated acknowledgment of receipt of this Order.

V. COMPLIANCE REPORTING

IT IS FURTHER ORDERED that Defendant make timely submissions to the Commission:

A. One year after entry of this Order, Defendant must submit a compliance report, sworn under penalty of perjury:

1. Defendant must: (a) identify the primary physical, postal, and email address and telephone number, as designated points of contact, which representatives of the Commission and Plaintiff may use to communicate with Defendant; (b) identify all of that Defendant's businesses by all of their names, telephone numbers, and physical, postal, email, and Internet addresses; (c) describe the activities of each business, including a description of any products and services offered that involve Consumer Reports; (d) describe in detail whether and how Defendant is in compliance with each Section of this Order; and (e) provide a copy of each Order Acknowledgment obtained pursuant to this Order, unless previously submitted to the Commission.

B. For 10 years following entry of this Order, Defendant must submit a compliance notice, sworn under penalty of perjury, within 14 days of any change in the following:

1. Defendant must report any change in: (a) any designated point of contact; or (b) the structure of Defendant or any entity that Defendant has any ownership interest in or controls directly or indirectly that may affect compliance obligations arising under this Order, including: creation, merger, sale, or dissolution of the entity or any subsidiary, parent, or affiliate that engages in any acts or practices subject to this Order.

C. Defendant must submit to the Commission notice of the filing of any bankruptcy petition, insolvency proceeding, or any similar proceeding by or against such Defendant within 14 days of its filing.

D. Any submission to the Commission required by this Order to be sworn under penalty of perjury must be true and accurate and comply with 28 U.S.C. § 1746, such as by concluding: "I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on: _____" and supplying the date, signatory's full name, title (if applicable), and signature.

E. Unless otherwise directed by a Commission representative in writing, all submissions to the Commission pursuant to this Order must be emailed to DEbrief@ftc.gov or sent by overnight courier (not the U.S. Postal Service) to: Associate Director for Enforcement, Bureau of Consumer Protection, Federal Trade Commission, 600 Pennsylvania Avenue NW, Washington, DC 20580. The subject line must begin: United States v. RentGrow, Inc.

VI. RECORDKEEPING

IT IS FURTHER ORDERED that Defendant must create certain records for 10 years

after entry of the Order, and retain each such record for 5 years. Specifically, Defendant must create and retain the following records:

A. Accounting records showing the revenues from all goods or services sold;

B. Personnel records showing, for each person providing services, whether as an employee or otherwise, that person's: name, addresses, and telephone numbers; job title or position; dates of service; and, (if applicable) the reason for termination;

C. Records of all consumer disputes and complaints, whether received directly or indirectly, such as through a third party, and any response; and

D. All records necessary to demonstrate full compliance with each provision of this Order, including all submissions to the Commission.

VII. COMPLIANCE MONITORING

IT IS FURTHER ORDERED that, for the purpose of monitoring Defendant's compliance with this Order:

A. Within 14 days of receipt of a written request from a representative of the Commission or Plaintiff, Defendant must: submit additional compliance reports or other requested information, which must be sworn under penalty of perjury; appear for depositions; and produce documents, for inspection and copying. The Commission and Plaintiff are also authorized to obtain discovery, without further leave of court, using any of the procedures prescribed by Federal Rules of Civil Procedure 29, 30 (including depositions by remote means), 31, 33, 34, 36, 45, and 69.

B. For matters concerning this Order, the Commission and Plaintiff are authorized to communicate directly with Defendant. Defendant must permit representatives of the

Commission or Plaintiff to interview any employee or other person affiliated with Defendant who has agreed to such an interview. The person interviewed may have counsel present.

C. The Commission and Plaintiff may use all other lawful means, including posing, through its representatives, as consumers, suppliers, or other individuals or entities, to Defendant or any individual or entity affiliated with Defendant, without the necessity of identification or prior notice. Nothing in this Order limits the Commission's lawful use of compulsory process, pursuant to Sections 9 and 20 of the FTC Act, 15 U.S.C. §§ 49, 57b-1.

VIII. ORDER TERMINATION DATE

IT IS FURTHER ORDERED that this Order will remain in effect for 10 years after its entry by this Court, after which point it will expire and no longer impose any requirements on Defendant.

IX. RETENTION OF JURISDICTION

IT IS FURTHER ORDERED that this Court retains jurisdiction of this matter for purposes of construction, modification, and enforcement of this Order.

SO ORDERED this __ day of ____, 2026.

_____

UNITED STATES DISTRICT JUDGE

SO STIPULATED AND AGREED:

FOR PLAINTIFF:

THE UNITED STATES OF AMERICA

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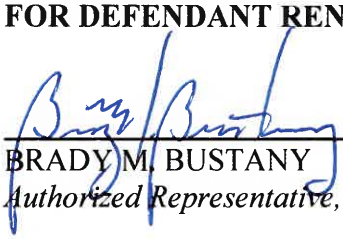

BRADY M. BUSTANY
Authorized Representative, RentGrow, Inc.

REASONS FOR SETTLEMENT

This statement accompanies the Stipulated Order for Permanent Injunction, Civil Penalty Judgment, and Other Relief ("Order") executed by defendant RentGrow, Inc. ("Defendant") in settlement of an action seeking injunctive relief, civil penalties, and other relief for Defendant's violations of Section 621(a) of the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. §§ 1681-1681x. The Order imposes injunctive relief and requires that Defendant pays $2,250,000 as a civil penalty.

Pursuant to Section 5(m)(3) of the FTC Act, 15 U.S.C. § 45(m)(3), the Commission hereby sets forth its reasons for settlement by entry of the Order:

Based on the allegations contained in the Complaint for Permanent Injunction, Civil Penalty Judgment, and Other Relief, and the factors set forth in Section 5(m)(1)(C) of the FTC Act, 15 U.S.C. § 45(m)(1)(C), the Commission believes that entry of the Order is appropriate and in the public interest.

First, the $2,250,000 civil penalty and the injunctive provisions in the Order constitute an effective means to ensure Defendant's future compliance with the law and deter others from engaging in similar violations.

Second, the Order is consistent with past orders entered in cases involving similar violations of the FCRA.

Finally, with the entry of the Order, the time and expense of litigation against the Defendant will be avoided.

For the foregoing reasons, the Commission believes that settlement by entry of the attached Order is justified and well within the public interest.