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The FTC Fines Las Vegas Man \$35,000 for Dumping Customer Financial Records In Public Dumpster

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This week, the [FTC finalized a \\$35,000 settlement with Gregory Navone](#), the real estate broker who left 40 boxes of customer tax returns, bank statements, consumer reports and other financial records in a public dumpster behind an office building in Las Vegas. The defendant agreed to the fine, which amounts to \$875 per box, as well as a [stipulated order \(.pdf\)](#) requiring him to adopt a comprehensive written information security program. We first [posted](#) on this case a year ago, after the FTC filed its [complaint \(.pdf\)](#).

In addition to the dumping of consumer financial information, the FTC alleging that Navone had failed to implement physical and electronic security procedures and or take reasonable steps to secure the customer records he stored at home in his garage. According to the FTC, these activities violated the FTC Act, the Federal Credit Reporting Act (FCRA) and Navone's own information security policy which read:

We take our responsibility to protect the privacy and confidentiality of customer information very seriously. We maintain physical, electronic, and procedural safeguards that comply with federal standards to store and secure information about you from unauthorized access, alteration and destruction.

(See [Complaint \(.pdf\)](#), Para. 9). Everyone subject to document destruction laws may want to note this case and keep in mind that \$35,000 is the fine imposed on an individual / small business.

If you are interested in submitting an article to Lexology, please contact Andrew Teague at ateague@lexology.com.

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