

Gross v. CitiMortgage: An Expansion of the Duty to Investigate Under the FCRA

December 16, 2022

David W. Thompson, Gregg Stevens, Joseph Apatov, and Sanford P. Shatz co-authored an article on “Gross v. CitiMortgage: An Expansion of the Duty to Investigate Under the FCRA” in the Conference on Consumer Finance Law (CCFL) [Consumer Finance Law Quarterly Report](#), Vol. 75, No. 4. The authors summarize *Gross v. CitiMortgage, Inc.* and review CFPB’s argument for greater furnisher duty to investigate. In *Gross*, the Ninth Circuit reversed the summary judgment granted to CitiMortgage and stated the furnisher had a duty to investigate factual and legal inaccuracy. Does this ruling contradict the Ninth Circuit’s prior decision in *Carvalho v. Equifax Information Services, LLC*? Read on for a detailed breakdown of Carvalho and the CFPB’s arguments.

Read the full article [here](#).

Related people

Joseph A. Apatov

Sanford Shatz

David W. Thompson