

**UNITED STATES OF AMERICA  
BEFORE FEDERAL TRADE COMMISSION**

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In the Matter of )  
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 )  
RICK A. RAHIM, ) DOCKET NO. C-3671  
individually and doing business )  
as NBDC CREDIT RESOURCE PUBLISHING. )  
 )  
 )

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**COMPLAINT**

The Federal Trade Commission, having reason to believe that Rick A. Rahim, individually and doing business as NBDC Credit Resource Publishing ("respondent"), has violated the provisions of the Federal Trade Commission Act, and it appearing to the Commission that a proceeding by it in respect thereof would be in the public interest, alleges:

**PARAGRAPH ONE:** Respondent Rick A. Rahim is an individual doing business as NBDC Credit Resource Publishing. His principal office or place of business is located at 7010 Brookfield Plaza, Suite 322, Springfield, Virginia 22150.

**PARAGRAPH TWO:** Respondent is engaged in the advertising, promotion, offering for sale, sale, and distribution of a credit repair product to the public.

**PARAGRAPH THREE:** The acts and practices of respondent alleged in this complaint have been in or affecting commerce, as "commerce" is defined in Section 4 of the Federal Trade Commission Act.

**PARAGRAPH FOUR:** Respondent has disseminated or has caused to be disseminated advertisements, including advertisements through the Internet, for his credit repair product. These advertisements include, but are not necessarily limited to, the attached Exhibit 1, which states, in part:

You are about to learn the truth about credit repair and "New Credit Files."

\* \* \*

New Credit Files DO WORK!

\* \* \*

We don't just sell you bogus information. We have created new credit files 100% legally for ourselves to make sure it works. Yes, we have successfully tested the system with all major credit bureaus and the IRS.

\* \* \*

Yes, it is true that you can obtain a new taxpayer identification number from the IRS. You can then use that number in place of your social security number to establish a brand-new credit file from each of the major credit bureaus.

**PARAGRAPH FIVE:** Through the use of the statements contained in the advertisements referred to in PARAGRAPH FOUR, including, but not necessarily limited to, the advertisement attached as Exhibit 1, respondent has represented, directly or by implication, that respondent's product whereby consumers create new credit files is legal.

**PARAGRAPH SIX:** In truth and in fact, respondent's product whereby consumers create new credit files is not legal. Therefore, the representation set forth in PARAGRAPH FIVE was, and is, false and misleading.

**PARAGRAPH SEVEN:** In the advertising, promotion, offering for sale, sale, and distribution of his credit repair product, including but not necessarily limited to the advertisement attached as Exhibit 1, respondent has represented that his product whereby consumers create new credit files is legal. Respondent has failed to disclose that consumers who follow respondent's product to create new credit files will violate federal criminal laws, including the federal law against making false statements on certain loan and credit applications, the federal law against falsely representing one's social security number, and the federal law against making false statements to a department or agency of the United States. This fact would be material to consumers in their decision to purchase respondent's product. The failure to disclose this fact, in light of the representation made, was, and is, a deceptive practice.

**PARAGRAPH EIGHT:** The acts and practices of respondent as alleged in this complaint constitute unfair or deceptive acts or practices in or affecting commerce in violation of Section 5(a) of the Federal Trade Commission Act.

THEREFORE, the Federal Trade Commission this 12th day of June, 1996, has issued this complaint against respondent.

By the Commission.

Donald S. Clark  
Secretary

**SEAL:**