

MONEY MYTHS SERIES

609 Letters and CPNs: What the Credit Repair Pitch Leaves Out

A 609 letter can't force deletion of accurate debts, and a CPN is a federal crime waiting to happen. What the FCRA, the FTC and California law actually say.

By Eric Ridley, attorney, Ridley Law · Updated September 2026 · Read online with live links: ridleylawoffices.com/609-letter/

Part of our [money myths series](#), where we look at who gets paid when you follow money advice from social media.

The pitch: send the bureaus a “609 letter” and they have to delete anything they can’t prove, even debts you owe. Or skip the old credit report entirely and buy a “credit privacy number,” a legal second identity for borrowing. **The verdict:** Section 609 is a right to see your file, and it doesn’t require bureaus to delete accurate information. A CPN is usually someone else’s Social Security number, often a child’s, and using one on a credit application can be a federal crime.

30 days

for a bureau to investigate a dispute, under federal law (15 U.S.C. § 1681i)

7 years

how long most accurate negative items can stay on a report (FTC)

\$40 to \$3,500

advertised CPN prices (Social Security Inspector General, 2011)

\$2.66 billion

redress judgment against Lexington Law and its affiliates (CFPB, 2023)

26%

of consumers found a potentially material error on a report (FTC study, 2012)

Who gets paid. Credit repair companies, template sellers, and CPN vendors. The CFPB sued one California credit repair company for monthly fees that often equaled \$89.99, plus setup fees of hundreds of dollars. The FTC alleged that Financial Education Services charged up to \$89 a month and often sent customers nothing more than form letters to mail to the bureaus. Lexington Law and its affiliates had more than 4 million customers and about \$388 million in revenue in 2022, according to the CFPB. CPN sites advertise numbers for \$40 to \$3,500. A disputed error costs you nothing to fix yourself.

What is a 609 letter?

A 609 letter is a request under Section 609 of the Fair Credit Reporting Act, 15 U.S.C. § 1681g, for a copy of what's in your credit file and where it came from. That's all Section 609 does: it requires the bureau to clearly and accurately disclose the information in your file and its sources. The summary of rights the same section requires says a bureau isn't required to remove accurate derogatory information unless it's outdated or can't be verified.

Even a credit bureau says so. Experian's explainer says a 609 request doesn't invoke your right to dispute inaccuracies, and that the dispute right is in Section 611 ([Experian](#), 2025).

Does a 609 letter remove accurate debts?

No. A dispute under Section 611, 15 U.S.C. § 1681i, requires the bureau to reinvestigate, usually within 30 days, and to delete an item only if it's inaccurate, incomplete, or can't be verified. The 30 days can stretch by up to 15 more if you send new information during the investigation. A bureau can also stop investigating a dispute it reasonably finds frivolous, as long as it tells you within five business days. Mass-produced template letters are what that rule is for.

California has its own version in the Consumer Credit Reporting Agencies Act, which gives bureaus 30 business days (Civ. Code § 1785.16). The FTC says it plainly: no one promising to repair your credit can legally remove information if it's both accurate and current ([FTC](#)). The CFPB adds that you generally can't have accurate negative information removed ([CFPB](#)).

Accurate negative items do age off. Collections and charge-offs drop off after seven years, and bankruptcies after ten (15 U.S.C. § 1681c).

Do credit reports have errors worth disputing?

Yes, and that's the honest part of the pitch. When the FTC had 1,001 consumers review their reports, 26% found at least one potentially material error, and about 5% saw a score change big enough to move them to a better credit risk tier after disputing ([FTC Section 319 study](#), 2012).

At least one potentially material error



Report changed after a dispute



Credit score changed



Moved to a better credit risk tier



FTC Section 319 study, fifth interim report, December 2012

Finding	Share of 1,001 participants
At least one potentially material error	26%
Report changed after a dispute	21%
Credit score changed	13%
Moved to a better credit risk tier	5.2%

The CFPB says there’s no reason to pay someone to dispute inaccuracies for you, because it’s already a legal right available to you for free. Its 2025 complaint report shows how far the industry has pushed this: it received about 5.8 million credit or consumer reporting complaints that year, and it discussed the growth of third parties, including credit repair organizations and people offering credit advice on social media, filing through its system ([CFPB Consumer Response report](#), 2026).

What is a CPN, and is it legal?

A CPN, sold as a credit privacy number, credit profile number, or secondary credit number, is a nine-digit number used in place of your Social Security number on credit applications. The Social Security Administration’s Inspector General told Congress that CPNs are a means of misusing the SSN and that, despite what credit repair websites imply, CPNs are not legal ([SSA OIG testimony](#), 2011). Prosecutors keep finding where the numbers come from. In one Oklahoma case, the CPNs were stolen Social Security numbers of children born in 2006 and 2008 ([DOJ](#), 2018).

The FTC warns that if you use a number other than your own to apply for credit, you won’t get it, and you could face fines or prison ([FTC](#)). The federal statutes back that up:

- 42 U.S.C. § 408(a)(7)(B): falsely representing a number as your Social Security number, with intent to deceive, is a felony punishable by up to five years.
- 18 U.S.C. § 1014: a false statement to influence a federally insured bank or credit union carries up to \$1,000,000 in fines or 30 years in prison.

The U.S. Attorney in eastern North Carolina put it in one line after sentencing a ring leader to 100 months: if someone offers to get you a CPN so you can open credit lines or get loans, they are inviting you to participate in a crime ([DOJ](#), 2021). In a related case, the synthetic identities called CPNs were added as authorized users on other people’s cards to build them up, which is the same mechanism sold as [tradeline rentals](#) ([DOJ](#), 2022).

Has anyone gone to prison for using a CPN?

Yes, both sellers and buyers. The chart shows sentences from U.S. Attorney releases.

Franklin, E.D.N.C. (2022)	126 mo
Griffin, E.D.N.C. (2021)	100 mo
Day, S.D. Ind. (2015)	92 mo
Cade, W.D. Okla. (2018)	18 mo
Oates, W.D. Okla. (2022)	18 mo
T. Cade, W.D. Okla. (2018)	12 mo

CPN prosecutions, from U.S. Attorney press releases

Defendant	What happened	Sentence	Restitution
Franklin	Built synthetic identities called CPNs and added them as authorized users	126 months	Not stated in release
Griffin	Took fees for “credit repair” and built fictitious profiles	100 months	\$412,885.17
Day	Charged \$2,000 to \$3,500 for “credit repair” using stolen SSNs called CPNs	92 months	\$679,000
Cade	Used CPNs that were stolen SSNs of children	18 months	\$112,924.54
Oates	Sold CPNs used in a synthetic identity scheme	18 months	\$185,896.87
T. Cade	Used CPNs on a home lease and credit applications	12 months	\$68,637.74

The North Carolina case also shows the risk for people who only use the numbers. Two co-defendants used their real names with nine-digit numbers the Social Security Administration never issued to them. Both pleaded guilty to the conspiracy. One got 24 months, and the other got one day in prison plus eight months of home detention.

What protections does credit repair law give you?

A lot, if you know them. Under the federal Credit Repair Organizations Act, a credit repair company can’t charge you until it has fully performed the service (15 U.S.C. § 1679b(b)), can’t advise you to make untrue statements to a bureau or lender, and can’t advise you to alter your identification to hide your credit record, which is the CPN pitch. Before you sign, it must give you a written disclosure saying no one has the right to have accurate, current, and verifiable information removed (§ 1679c). You have three business days to cancel (§ 1679e), and you can

recover at least what you paid if it breaks the law (§ 1679g). The FTC’s Telemarketing Sales Rule separately bars collecting fees for credit repair sold by phone until the promised results show up on a credit report issued more than six months later (16 C.F.R. § 310.4(a)(2)).

California’s Credit Services Act goes further. A credit services organization can’t take money before full performance, can’t remove or advise removing accurate, non-obsolete adverse information, and can’t help you create a new credit record using a different name, address, Social Security number, or employer identification number (Civ. Code § 1789.13). It must register with the Attorney General and post a \$100,000 surety bond (§ 1789.18), and a consumer who’s harmed recovers no less than what they paid, plus attorney fees (§ 1789.21). The Attorney General warns specifically against creating a new credit identity with an EIN ([California Attorney General](#)).

You can check whether a company is registered on the Attorney General’s list. Every older registration expired on December 31, 2022, so a company that hasn’t registered since then isn’t on it ([Attorney General registry](#)).

What happened to Lexington Law?

A federal court in Utah ruled in March 2023 that Lexington Law and its affiliates violated the Telemarketing Sales Rule’s ban on upfront fees, and in August 2023 it entered a judgment of \$2,660,926,481 in consumer redress plus civil penalties (CFPB). The companies had filed for bankruptcy, and the CFPB said it would decide whether its victims relief fund can pay the people harmed. Treat the judgment as a measure of the conduct, not money people got back.

Some refunds do arrive. In the Financial Education Services case, the FTC is sending checks to 443,048 customers ([FTC, 2026](#)).

What does paid credit repair cost? A worked example

Take a hypothetical borrower who signs up for a year of credit repair at \$89.99 a month, the fee alleged in one CFPB case, plus a \$199 setup fee. The company sends template letters disputing everything. Accurate items stay, because the law doesn’t require deleting them.

Credit repair: 12 months at \$89.99 plus \$199 setup		
		\$1,278.88
Disputing errors yourself		
		\$0.00

Hypothetical cost of paid credit repair		
Item	Amount	Basis
Monthly fee	\$89.99	Fee alleged in a CFPB credit repair case
Months	12	Hypothetical

Item	Amount	Basis
Setup fee	\$199	Hypothetical (CFPB alleged setup fees of hundreds of dollars)
Total for one year	\$1,278.88	Arithmetic
Disputing yourself	\$0	CFPB: disputing is a legal right available to you for free

That's \$1,278.88 for letters the borrower could have sent for the price of postage, about real errors only.

What the pitch says compared with what the law says

Pitch	The rule	Source
A 609 letter forces deletion of anything unverified	Section 609 is a disclosure right; deletion comes from a Section 611 dispute, only for inaccurate, incomplete, or unverifiable items	15 U.S.C. §§ 1681g, 1681i
Bureaus must respond to every letter	They can end a frivolous dispute with notice within five business days	15 U.S.C. § 1681i(a)(3)
A CPN is a legal second identity	Using a false number as your SSN with intent to deceive is a felony	42 U.S.C. § 408(a)(7)(B)
Pay up front and we'll fix it	Advance fees are banned under federal and California law	15 U.S.C. § 1679b(b); Civ. Code § 1789.13
Only experts can dispute	Disputing is free and anyone can do it	CFPB

What should you do instead?

- ✓ Pull all three reports for free at AnnualCreditReport.com. The FTC says the bureaus now let everyone check weekly.
- ✓ Dispute specific errors yourself with each bureau and the company that reported the item. Keep copies.
- ✓ For accurate negatives, focus on paying on time from here. Most drop off after seven years.
- ✓ Never use any number but your own Social Security number on a credit application.
- ✓ Before paying any credit repair company, check the California Attorney General's registry and refuse to pay up front.
- ✓ Freeze your children's credit, since CPN sellers have used kids' numbers.

If debt is the real problem, see [debt settlement and elimination scams](#) before you sign anything.

Frequently asked questions

Does a 609 letter work?

It works as a request for your file. It doesn't make a bureau delete accurate information, and Experian says a 609 request isn't a dispute at all. If an item is wrong, a Section 611 dispute is the tool.

Can a credit bureau ignore my dispute?

Only if it reasonably decides the dispute is frivolous or irrelevant, and then it must tell you within five business days. Template letters with no specifics are the usual target.

Is a CPN number legal?

No. The Social Security Inspector General says CPNs aren't legal, and using a false number as your Social Security number on a credit application can be a felony under 42 U.S.C. § 408 and 18 U.S.C. § 1014.

Can I use an EIN instead of my Social Security number for personal credit?

No. California law bars credit services companies from helping you create a new credit record with a different SSN or EIN, and the Attorney General warns against it.

How much does credit repair cost?

In regulator cases, fees ran about \$89 a month plus setup fees of hundreds of dollars. Disputing errors yourself is free.

Can I get my money back from a credit repair company?

Often. Federal law gives you three business days to cancel and lets you recover what you paid if the company broke the law. California law adds a minimum recovery of what you paid plus attorney fees.

Related reading: [renting authorized-user tradelines](#) and [0% business funding and credit card stacking](#). Questions about a parent's debts after a death? See [am I responsible for my parents' debts](#) or [talk to Ridley Law](#).

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Questions about your own plan?

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