

## Legal Updates & News

### Bulletins

---

## FTC Extends Enforcement Deadline for Identity Theft Red Flags Rule Until June 1, 2010

October 2009

We reported earlier today that the Federal Trade Commission (FTC) appeared to be plowing ahead with the effective date of the Red Flags Rule, despite a Federal Court Order that the FTC had over-reached in its attempt to apply the Rule to lawyers. The Rule was previously scheduled to take effect this Sunday, November 1.

Just to keep us guessing, the FTC has just announced that, at the request of Members of Congress, it is delaying enforcement of the “Red Flags” Rule yet again, until June 1, 2010, for financial institutions and creditors subject to enforcement by the FTC. The FTC’s announcement of its decision to delay enforcement is available at: <http://www.ftc.gov/opa/2009/10/redflags.shtm>.

We will continue tracking challenges to the enforcement of the Red Flags Rule and keep clients abreast of key developments. Please feel free to contact us if you have questions regarding the application of the Red Flags Rule to your business or organization.

Andrew M. Smith  
202.887.1558  
[asmith@mofo.com](mailto:asmith@mofo.com)

Vanessa R. Waldref  
202.887.8776  
[vwaldref@mofo.com](mailto:vwaldref@mofo.com)

#### Related Practices:

- › [Financial Services Law](#)
- › [Privacy and Data Security](#)