

Podcasts | July 30, 2025

# ***Suluki* Secrets: Behind the Scenes of Reasonable Investigations**

## **FCRA Focus Podcast**

### **SPEAKERS**

[David M. Gettings](#) | [Brooke K. Conkle](#) | [Mandi K. Blackmon](#)

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In this episode of *FCRA Focus*, host Dave Gettings is joined by Brooke Conkle and Mandi Blackmon to explore the intricacies of a furnisher's reasonable investigation under Section 1681s-2(b) of the Fair Credit Reporting Act (FCRA). The discussion centers around the Second Circuit's recent decision in the *Suluki* case, which addresses the standards for conducting a reasonable investigation in the context of identity theft allegations. The hosts delve into the background of the case, the arguments presented by both parties, and the court's rationale in affirming summary judgment for the defendant. They also examine how this decision aligns with prior Second Circuit precedent and its implications for compliance and litigation strategies. Tune in for a detailed analysis of how the *Suluki* decision reinforces the principle that investigations must be reasonable, not perfect, and what this means for furnishers navigating similar claims.

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