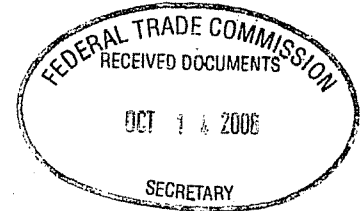




# COUNCIL OF INTERNATIONAL INVESTIGATORS

**Council Headquarters  
2150 N 107<sup>th</sup> Street, Ste. 205  
Seattle, WA 98133-9009**

**ORIGINAL**



October 13, 2008

Donald S. Clark  
Office of the Secretary  
Federal Trade Commission  
Room H-135  
600 Pennsylvania Avenue NW  
Washington DC 20580

Re: Proposed Consent Order  
In the matter of Reed Elsevier & Choice Point  
FTC File No. 081-0133

Dear Mr. Clark,


I am a licensed private investigator in Illinois and Wisconsin and am the current Chairman of the Council of International Investigators. I am writing on behalf of myself as well as the hundreds of private investigators that are members of the Council of International Investigators.

I have been licensed for over 21 years and during that time have seen numerous changes in how private investigators conduct business. One tremendous change has been accessing database information from such businesses as LexisNexis and Choice Point. Access to that information has been critical in locating witnesses, solving crimes against business, providing adequate defense in criminal cases, and in our own business practice, investigating cases of mortgage fraud. In the past five years I have personally investigated nearly one thousand cases involving fraud in the granting of sub-prime mortgages.

Over the past few years there has been a tremendous amount of consolidation in the database provider industry. I believe that as these providers consolidate, it has a real potential to create a monopoly on data and create a clear and immediate antitrust situation. The Commission found this to be true in regard to access to information to public law enforcement. The same is true regarding the sale of public records in the private sector.

I strongly urge the Commission not to approve this acquisition until respondents can divest themselves of the public record services they provide to private industry as well as public law enforcement. Otherwise I fear that this and other mergers in this industry will create a situation where there will be significant reduced competition, resulting in increased prices, less access, and poor service, none of which will benefit the consumer or citizenry.

Respectfully submitted,

 James R. Kirby  
Chairman  
Council of International Investigators