

UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

Jeremy Siegfried Schulte Roth & Zabel LLP 1152 Fifteenth Street, NW, Washington, DC 20005

MAR 3 | ZOIT

Re:

FOIA-2017-00609 FleetCor Technologies

Dear Mr. Siegfried:

This is in response to your request dated March 07, 2017, under the Freedom of Information Act seeking access to the following records:

- 1. All complaints filed against FleetCor Technologies and its subsidiaries (Fuelman, Comdata, Commercial Fueling Network, Pacific Price, and CLC Lodging) from January 1, 2010 to the present;
- 2. All records relating to prior and current investigations/inquiries of Fleetcor and its subsidiaries with regard to billing and/or bill collections practices.

In accordance with the FOIA and agency policy, we have searched our records, as of March 07, 2017, the date we received your request in our FOIA office.

We have located approximately 550 responsive consumer complaints. I am granting partial access to, and am enclosing copies of, the accessible records. These complaints, and portions of other complaints, are subject to two of the nine exemptions to the FOIA's disclosure requirements, as explained below.

We are withholding 1 complaint under FOIA Exemption 3, 5 U.S.C. § 552(b)(3), because it is exempt from disclosure by another statute; specifically, Section 21(f) of the FTC Act provides that the FTC may not disclose any material reflecting a consumer complaint obtained from a foreign source if that foreign source has requested confidential treatment. 15 U.S.C.§ 57b-2(f).

Enclosed are 549 responsive complaints that consumers have sent to the Federal Trade Commission ("FTC"). You should know that the enclosed complaints have not necessarily been verified by the FTC. Therefore, you should make your own judgment about relying on the information provided. I am denying access to consumers' names and addresses, and any other identifying information found in the complaints. This information is exempt from release under FOIA Exemption 6, 5 U.S.C. § 552(b)(6), because individuals' right to privacy outweighs the general public's interest in seeing personal identifying information. See The Lakin Law Firm v. FTC, 352 F.3d 1122 (7th Cir. 2003).

Also enclosed are 2 constituent complaints. In addition to withholding personal identifying information under Exemption 6, I am withholding any confidential commercial or

financial information. This information is exempt from disclosure under FOIA Exemption 4, 5 U.S.C. § 552(b)(4). Please note that we did not locate any responsive records for section 2 of your request.

Based on the fee provisions of the FOIA, 5 U.S.C. § 552(a)(4)(A), and the Commission's Rules of Practice, 16 CFR § 4.8 et seq., as amended, I am also enclosing an invoice for the charges we incurred for this response to your request.

Please make checks payable to U.S. Treasury and send payment to:

Financial Management Office, H-790 Federal Trade Commission 600 Pennsylvania Avenue, NW Washington, DC 20580

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington, D.C. 20580, within 90 days of the date of this letter. Please enclose a copy of your original request and a copy of this response.

You also may seek dispute resolution services from the FTC FOIA Public Liaison Richard Gold via telephone at 202-326-3355 or via e-mail at rgold@ftc.gov; or from the Office of Government Information Services via email at rgold@ftc.gov; or from the Office of Government Information Services (OGIS), National Archives and Records Administration, 8601 Adelphi Road, College Park, MD 20740.

If you have any questions about the way we handled your request, or about our FOIA regulations or procedures, please contact Katie Baker at 202-326-2869.

Dione J. Stearns

sincerely.

Assistant General Counsel

Enc. 1 CD Invoice