

November 24, 2025

FORMAL NOTICE OF DISPUTE - Round 1

To: Equifax

ACCOUNT: Multiple Accounts

[Send via Certified Mail - Return Receipt Requested]

December 19, 2024

Equifax Information Services LLC Consumer Dispute Center P.O. Box 740256 Atlanta, GA 30374

****RE: FORMAL FCRA DISPUTE - DEMAND FOR COMPREHENSIVE FILE REVIEW****
****CONSUMER:** Daniel Fermin **FILE NUMBER:** [If known from credit report] **DISPUTE ROUND:** 1 - Initial Formal Notice**

Dear Equifax:

I am writing to formally dispute and demand comprehensive review of my consumer credit file maintained by your company. This dispute is made pursuant to my statutory rights under the Fair Credit Reporting Act (FCRA), 15 U.S.C. 1681 et seq., and addresses systematic accuracy failures identified across the credit reporting industry affecting my file.

****I. LEGAL BASIS FOR DISPUTE****

Under FCRA 1681i(a)(1)(A), I have the absolute right to dispute any information in my credit file and demand thorough investigation. Your agency is legally required to:

1. ****Conduct reasonable investigation**** within 30 days (15 U.S.C. 1681i(a)(1)(A))
2. ****Follow reasonable procedures**** for maximum possible accuracy (15 U.S.C. 1681e(b))
3. ****Maintain accurate information**** in consumer files (15 U.S.C. 1681e(b))
4. ****Delete unverifiable**

information** within 5 business days (15 U.S.C. 1681i(a)(5)(A)) 5. **Provide written investigation results** (15 U.S.C. 1681i(a)(6)(A))

****II. SYSTEMATIC ACCURACY CONCERNS IDENTIFIED****

****Cross-Bureau Analysis Reveals Systematic Problems:**** My analysis of credit reports from TransUnion, Experian, and your agency reveals systematic accuracy failures affecting multiple accounts:

ACCOUNT REVIEW DEMAND: OPENSKY CBNK

****Account Information:**** - Original Creditor: OpenSky Secured Credit Card - Account Number (masked): [XXXX-XXXX-XXXX-XXXX] - Concern: ****CROSS-BUREAU INCONSISTENCIES****

****Specific Issues Identified:**** Other bureaus are reporting this account with: - ****TransUnion:**** Future date reporting (10/06/2025) - temporally impossible - ****Experian:**** Different account information than TransUnion for same account - ****Your File:**** Requires verification for consistency and accuracy

****Why This Matters:**** If you are reporting this account differently than other bureaus, it indicates either: 1. ****Furnisher providing different information**** to different bureaus (FCRA violation) 2. ****Bureau processing errors**** creating inconsistent information 3. ****Systematic coordination failure**** across credit reporting industry

****What I Demand:**** 1. ****Comprehensive review**** of OPENSKY account information 2. ****Verification**** that information matches actual account status 3. ****Coordination check**** with other bureaus for consistency 4. ****Correction**** of any inaccuracies identified

ACCOUNT REVIEW DEMAND: TBOM/MILSTNE

****Account Information:**** - Original Creditor: TBOM/Milestone Credit Card - Account Number (masked): [XXXX-XXXX-XXXX-XXXX] - Concern: ****PAYMENT HISTORY ACCURACY****

****Specific Issues Identified:**** - ****Experian**** is reporting internal contradictions (past due + all current simultaneously) - ****Industry Pattern:**** Payment history contradictions indicate systematic problems - ****Your File:**** Requires verification for accuracy and logical consistency

****What I Demand:**** 1. **Thorough review** of payment history accuracy 2. **Verification** with furnisher using documentary evidence 3. **Logical consistency check** to prevent contradictions 4. **Correction** of any inaccurate payment information

****III. INDUSTRY-WIDE ACCURACY FAILURES****

****Systematic Problems Identified:**** The violations found at other bureaus indicate industry-wide accuracy failures: - **Future date reporting** (TransUnion) - basic data validation failure - **Internal contradictions** (Experian) - logical consistency failure - **Cross-bureau inconsistencies** - coordination failure

****Your Responsibility:**** As a major credit reporting agency, you have heightened responsibility to: - **Implement superior accuracy procedures** - **Avoid systematic industry failures** - **Maintain higher standards** than competitors - **Ensure comprehensive accuracy** in consumer files

****IV. WILLFULNESS CONCERNS UNDER SAFECO STANDARD****

The systematic nature of industry violations raises willfulness concerns under **Safeco Insurance Co. v. Burr**, 551 U.S. 47 (2007):

****Industry Knowledge:**** - **CFPB supervision** documenting systematic accuracy problems - **Regulatory guidance** on data validation requirements - **Prior consent orders** addressing accuracy procedures - **Industry awareness** of systematic failures

****Your Obligation:**** - **Implement superior procedures** to avoid known industry problems - **Enhanced validation** to prevent systematic failures - **Proactive accuracy measures** beyond minimum compliance - **Industry leadership** in accuracy standards

****V. COMPREHENSIVE FILE REVIEW DEMAND****

****What I Request:**** 1. **Complete file review** for accuracy and consistency 2. **Cross-bureau comparison** to identify inconsistencies 3. **Furnisher verification** using documentary evidence 4. **Systematic accuracy check** to prevent known industry problems 5. **Proactive correction** of any inaccuracies identified

****Legal Standard:**** Your investigation must meet the **“reasonable procedures”** standard established in: - **Cushman v. Trans Union Corp.**, 115 F.3d 220 (3d Cir. 1997) - **Safeco Insurance Co. v. Burr**, 551 U.S. 47 (2007) - **Nelson v. Chase Manhattan Mortgage Corp.**, 282 F.3d 1057 (9th Cir. 2002)

****VI. INVESTIGATION REQUIREMENTS****

****You Must:**** 1. **Conduct thorough review** within 30 days 2. **Contact furnishers** with specific verification requests 3. **Obtain documentary evidence** supporting any continued reporting 4. **Compare with other bureaus** for consistency 5. **Delete unverifiable information** within 5 business days 6. **Correct any inaccuracies** identified during review 7. **Provide comprehensive written results**

****You Must Not:**** 1. Use automated form responses 2. Rely on furnisher confirmation without documentation 3. Ignore systematic accuracy concerns 4. Continue reporting unverified information 5. Delay comprehensive investigation

****VII. METHOD OF VERIFICATION DEMAND****

Pursuant to ***Cushman v. Trans Union Corp.***, I demand **“method of verification”** for all information in my file:

1. **Documentary evidence** supporting all account information 2. **Furnisher communication records** showing verification process 3. **Internal procedures** followed for accuracy verification 4. **Business records** supporting dates, amounts, and status information

****VIII. FORMAL LEGAL NOTICE****

This letter constitutes **“formal notice”** of potential FCRA violations. Under federal law, I am entitled to recover:

- **Statutory damages:** \$100-\$1,000 per violation (15 U.S.C. 1681n(a)(1)(A)) - **Actual damages:** All documented financial harm (15 U.S.C. 1681o(a)(1)) - **Punitive damages:** Up to \$1,000 per willful violation (15 U.S.C. 1681n(a)(2)) - **Attorney's fees and costs:** Full reimbursement (15 U.S.C. 1681n(a)(3))

****IX. OPPORTUNITY FOR VOLUNTARY COMPLIANCE****

This is your opportunity to demonstrate industry leadership in accuracy standards by: -
Conducting superior investigation beyond minimum requirements - **Implementing
enhanced accuracy procedures** - **Proactively correcting** any inaccuracies identified -
Setting industry standard for comprehensive accuracy

**If comprehensive investigation is not conducted and any inaccuracies are not corrected
within 30 days, I will pursue federal litigation** seeking full damages and injunctive relief.

****X. CONCLUSION****

I expect Equifax to demonstrate industry leadership through comprehensive, thorough
investigation and proactive accuracy measures. The systematic failures identified at other
bureaus provide you the opportunity to distinguish your agency through superior accuracy
standards.

I look forward to your prompt, comprehensive investigation and favorable resolution.

Sincerely,

Daniel Fermin [Address] [Phone Number] [Email Address]

Enclosures: Supporting documentation **CC:** Federal Trade Commission, Consumer
Financial Protection Bureau

Sincerely,

Daniel Fermin

Consumer