

# Internal Analysis: Wendy Perdomo

Case #BAG-FCRA-0106 | Generated December 14, 2025 | Round 1

CASE STRENGTH

8/10

STANDING SCORE

3/10

VIOLATIONS

9

WILLFULNESS

0%

DEFENDANTS

3

TARGET VALUE

# 1. Standing Analysis (TransUnion v. Ramirez)

Overall Standing Score: 3/10

Element	Status	Assessment
Dissemination	<div><div></div>No</div>	No hard inquiries documented in provided report to establish dissemination during inaccurate reporting period No account information or inquiry data available for analysis. No inaccurate information was disseminated – insufficient account data to evaluate. Only 3 inquiries present with no inaccurate tradeline information being disseminated.
Concrete Harm	<div><div></div>Yes</div>	Report indicates 'bad payment history', 'high credit usage', and 'recent missed payment' factors suppressing scores. Balance contradictions affect utilization calculations used in credit scoring. Insufficient credit report data provided for violation analysis. Report appears incomplete with only fragmentary balance and payment information. No substantiated FCRA violations found in credit report excerpt. Only creditor contact information and public records section provided – no account data available for analysis. FICO scores 712–731 are in Good range across all bureaus. No evidence of credit suppression, denials, or adverse actions. Limited tradeline data present for analysis.
Causation	<div><div></div>Yes</div>	Balance contradictions directly affect credit utilization ratios which are primary factors in credit scoring algorithms. Date discrepancies affect account currency assessment. Cannot establish causation without complete credit report data. No causal link between credit reporting and harm – no violations

identified. No substantiated FCRA violations identified to establish causal link to harm.

## 2. Violation Summary

Total Violations: 9 | Willful: 0 (0%)

Violation Type	FCRA Section	Count	Willfulness
Bureau Contradiction – Date Last Active	§1681e(b)	3	0 WILLFUL
Bureau Contradiction – Balance Discrepancy	§1681e(b)	6	0 WILLFUL

## 3. Critical Violations (Impossible Contradictions)

9 impossible contradictions found – These are the strongest violations.

Account	Bureau	Description	FCRA §
TD BANK NA	TransUnion	3–year discrepancy in Date Last Active between Experian (06/01/2022) and TransUnion/Equifax (05/2025...	§1681e(b)
TD BANK NA	Experian	3–year discrepancy in Date Last Active between Experian (06/01/2022) and TransUnion/Equifax (05/2025...	§1681e(b)
TD BANK NA	Equifax		§1681e(b)

Account	Bureau	Description	FCRA §
		3-year discrepancy in Date Last Active between Experian (06/01/2022) and TransUnion/Equifax (05/2025...	
TD BANK N.A. (Line of Credit)	TransUnion	Material balance contradiction – TransUnion reports \$987 balance while Experian and Equifax report \$...	§1681e(b)
TD BANK N.A. (Line of Credit)	Experian	Material balance contradiction – TransUnion reports \$987 balance while Experian and Equifax report \$...	§1681e(b)
TD BANK N.A. (Line of Credit)	Equifax	Material balance contradiction – TransUnion reports \$987 balance while Experian and Equifax report \$...	§1681e(b)
NISSAN- INFINITI LT	TransUnion	\$489 balance discrepancy between Experian and other bureaus exceeds materiality threshold, affecting...	§1681e(b)
NISSAN- INFINITI LT	Experian	\$489 balance discrepancy between Experian and other bureaus exceeds materiality threshold, affecting...	§1681e(b)
NISSAN- INFINITI LT	Equifax	\$489 balance discrepancy between Experian and other bureaus exceeds materiality threshold, affecting...	§1681e(b)

## 4. Willfulness Assessment (Safeco Standard)

**Willfulness Score:** 0/10

**Percentage:** 0% of violations show willfulness

**Analysis:** Moderate willfulness. Some violations may warrant statutory damages enhancements.

## 5. Damages Calculation

Category	Conservative	Target	Aggressive
Statutory Damages	\$3,375	\$6,750	\$10,125
Punitive Damages	\$0	\$0	\$0
Actual Damages	\$500	\$500	\$500
<b>Total Settlement Target</b>	<b>\$4,388</b>	<b>\$8,775</b>	<b>\$13,162</b>

## 6. Defendant Targeting

**Total Defendants: 3**

- **Equifax** – 3 violations
- **Experian** – 3 violations
- **TransUnion** – 3 violations

### Pre-Approval Action Items

- Review standing elements for completeness
- Verify all violations are properly categorized
- Confirm defendant identification is accurate

- Validate damages calculations

## Post-Approval Next Steps

- Generate client-facing report
- Prepare Round 1 dispute letters
- Draft legal memorandum if litigation recommended
- Schedule client consultation

# 8. Recommended Litigation Path & Timeline

Phase	Timeline	Key Actions
Pre-Litigation	Weeks 1-4	Round 1 dispute letters, bureau investigations
Demand Letter	Week 5-6	Formal demand to defendants, settlement negotiations
Complaint Filing	Week 7-8	File federal complaint if no settlement
Discovery	Months 3-6	Interrogatories, depositions, document requests
Settlement/Trial	Months 6-12	Mediation or trial preparation