

# FCRA LITIGATION ANALYSIS - CONFIDENTIAL

**Client:** Wendy Perdomo

**Analysis ID:** 105

**Date:** December 10, 2025

*This document contains confidential attorney work product and privileged information. It is prepared for internal legal review and potential submission to counsel. Unauthorized disclosure is prohibited.*

## I. CASE STRENGTH SCORE: 8/10

## II. VIOLATIONS IDENTIFIED: 15

- §1681e(b) - Bureau Contradiction - Date Last Active (TransUnion)

3-year discrepancy in Date Last Active between Experian (2022) and other bureaus (2025) | Date Last Active: 05/10/2025

Willful: No

Statutory Damages: \$100.0-\$1000.0

- §1681e(b) - Bureau Contradiction - Date Last Active (Experian)

3-year discrepancy in Date Last Active between Experian (2022) and other bureaus (2025) | Date Last Active: 06/01/2022

Willful: No

Statutory Damages: \$100.0-\$1000.0

- §1681e(b) - Bureau Contradiction - Date Last Active (Equifax)

3-year discrepancy in Date Last Active between Experian (2022) and other bureaus (2025) | Date Last Active: 05/12/2025

Willful: No

Statutory Damages: \$100.0-\$1000.0

- §1681e(b) - Bureau Contradiction - Balance Discrepancy (TransUnion)

Material balance discrepancy - TransUnion reports \$987 while other bureaus report \$0 | Balance: \$987.00

Willful: No

Statutory Damages: \$100.0-\$1000.0

- §1681e(b) - Bureau Contradiction - Balance Discrepancy (Experian)

Material balance discrepancy - TransUnion reports \$987 while other bureaus report \$0 | Balance: \$0.00

Willful: No

Statutory Damages: \$100.0-\$1000.0

- §1681e(b) - Bureau Contradiction - Balance Discrepancy (Equifax)

Material balance discrepancy - TransUnion reports \$987 while other bureaus report \$0 | Balance: \$0.00

Willful: No

Statutory Damages: \$100.0-\$1000.0

- §1681e(b) - Bureau Contradiction - Balance Discrepancy (TransUnion)

\$489 balance difference between Experian and other bureaus exceeds materiality threshold | Balance: \$14,180.00

Willful: No

Statutory Damages: \$100.0-\$1000.0

- §1681e(b) - Bureau Contradiction - Balance Discrepancy (Experian)

\$489 balance difference between Experian and other bureaus exceeds materiality threshold | Balance: \$13,691.00

Willful: No

Statutory Damages: \$100.0-\$1000.0

- §1681e(b) - Bureau Contradiction - Balance Discrepancy (Equifax)

\$489 balance difference between Experian and other bureaus exceeds materiality threshold | Balance: \$14,180.00

Willful: No

Statutory Damages: \$100.0-\$1000.0

- §1681e(b) - Duplicate Accounts (TransUnion)

Same account number reported twice with different open dates - Metro 2 format violation | Account #377481XXXXXX opened 07/24/2019 and 10/21/2024

Willful: No

Statutory Damages: \$100.0-\$1000.0

- §1681e(b) - Duplicate Accounts (Experian)

Same account number reported twice with different open dates - Metro 2 format violation | Account #377481XXXXXX opened 07/24/2019 and 10/21/2024

Willful: No

Statutory Damages: \$100.0-\$1000.0

- §1681e(b) - Duplicate Accounts (Equifax)

Same account number reported twice with different open dates - Metro 2 format violation | Account #377481XXXXXX opened 07/24/2019 and 10/21/2024

Willful: No

Statutory Damages: \$100.0-\$1000.0

- §1681e(b) - Duplicate Accounts (TransUnion)

Same account number reported twice with different open dates - Metro 2 format violation | Account #536817XXXXXX opened 02/19/2022 and 01/26/2019

Willful: No

Statutory Damages: \$100.0-\$1000.0

- §1681e(b) - Duplicate Accounts (Experian)

Same account number reported twice with different open dates - Metro 2 format violation | Account #536817XXXXXX opened 02/19/2022 and 01/26/2019

Willful: No

Statutory Damages: \$100.0-\$1000.0

- §1681e(b) - Duplicate Accounts (Equifax)

Same account number reported twice with different open dates - Metro 2 format violation | Account #536817XXXXXX opened 02/19/2022 and 01/26/2019

Willful: No

Statutory Damages: \$100.0-\$1000.0

### **III. STANDING ANALYSIS**

- Concrete Harm: Yes
- Dissemination: No
- Causation: Yes

### **IV. DAMAGES CALCULATION**

- Actual Damages: \$2,000
- Statutory Damages: \$11,250
- Punitive Damages: \$0
- Total Exposure: \$23,250
- Settlement Target (65%): \$15,112