

November 25, 2025

FORMAL NOTICE OF DISPUTE - Round 1

To: TransUnion

ACCOUNT: Multiple Accounts

- TransUnion Reports: Date Last Active: 10/09/2025, Payment Status: Paid/paying as agreed
- Experian Reports: Date Last Active: 07/31/2023, Payment Status: Past due 30 days (2x) -
Contradiction: 2+ year date discrepancy + clean vs. derogatory payment history

How This Violates FCRA: The fundamental contradiction between clean payment history (TransUnion) and derogatory payment history (Experian) for the same account violates 1681e(b). Payment history is 35% of credit score calculations, making this contradiction materially harmful.

Evidence of Inaccuracy: Same account cannot simultaneously have "paid/paying as agreed" status and "past due 30 days two times" status. Additionally, TransUnion's future date (10/09/2025) is impossible and unverifiable.

Applicable Case Law: - **Philbin v. Trans Union Corp.**, 101 F.3d 957 (3d Cir. 1996): Payment history inaccuracies are material violations affecting creditworthiness - **Stevenson v. TRW Inc.**, 987 F.2d 288 (5th Cir. 1993): Material contradictions between bureaus violate reasonable procedures

What I Demand: 1. Investigate payment history accuracy with TBOM/Milestone immediately 2. Verify correct Date Last Active through business records 3. Correct any inaccuracies or delete if unverifiable 4. Explain contradictory reporting between bureaus 5. Provide Method of Verification for all reported information

IV. PATTERN OF SYSTEMATIC VIOLATIONS

The above contradictions are not isolated errors but evidence systematic failure to maintain reasonable procedures across the credit reporting industry. The pattern includes:

- **Future date reporting** by TransUnion (impossible dates: 10/06/2025, 10/09/2025) -
Material contradictions in dates, payment history, and credit limits - **Inconsistent bureau reporting** creating consumer harm through contradictory credit profiles - **Failed verification procedures** allowing obviously inaccurate information to persist

****V. WILLFULNESS INDICATORS****

Your company's violations evidence reckless disregard of FCRA requirements:

- **Industry knowledge:** Equifax has comprehensive FCRA training and compliance programs - **Prior regulatory actions:** CFPB consent orders and settlements put you on notice of accuracy requirements - **Systematic contradictions:** Pattern across multiple accounts suggests inadequate verification procedures - **Consumer harm:** Contradictory reporting prevents accurate creditworthiness assessment

This may constitute willful violation under **Safeco Insurance Co. v. Burr**, 551 U.S. 47 (2007), entitling me to statutory damages of \$100-\$1,000 per violation, plus actual damages and punitive damages up to \$1,000 per willful violation.

****VI. MY DAMAGES CLAIM****

Statutory Damages: \$100-\$1,000 per violation x number of violations = \$

Sincerely,

Test - Verify Fixes

Consumer