

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Case No. 1:25-cv-01987

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EMAN YOUSSEF,
Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES, LLC (Georgia
corporation, authorized to do business in New York),
EXPERIAN INFORMATION SOLUTIONS, INC. (Ohio
corporation, authorized to do business in New York),
TD BANK, N.A. (Delaware corporation, authorized to
do business in New York),
TRANS UNION, LLC (Delaware corporation,
authorized to do business in New York)
Defendants.

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COMPLAINT

PRELIMINARY STATEMENT

Plaintiff brings this action against the defendants for
violations of the Fair Credit Reporting Act and the New
York Fair Credit Reporting Act...

PARTIES

1. Plaintiff EMAN YOUSSEF is an individual residing in
22-15 22nd Street, East Elmhurst, NY 11370.

2. Defendant EQUIFAX INFORMATION SERVICES, LLC (Georgia corporation, authorized to do business in New York) is a Consumer Reporting Agency.

3. Defendant EXPERIAN INFORMATION SOLUTIONS, INC. (Ohio corporation, authorized to do business in New York) is a Consumer Reporting Agency.

4. Defendant TD BANK, N.A. (Delaware corporation, authorized to do business in New York) is a Furnisher of Information.

5. Defendant TRANS UNION, LLC (Delaware corporation, authorized to do business in New York) is a Consumer Reporting Agency.

FACTUAL BACKGROUND

14. Plaintiff Eman Youssef is an individual consumer under the FCRA and NY FCRA, residing in the State of New York, borough of Manhattan.

15. Plaintiff opened a TD Bank credit card account on or around July 2023 with an ,000 credit limit.

16. Plaintiff travelled to Egypt with her family from June 30, 2024 through July 30, 2024.

17. Before leaving, Plaintiff informed TD Bank of her trip and verified her cards would work in Egypt.

18. Plaintiff had two physical cards and brought both to Egypt.

19. Imposters used her account to make over ,700 in fraudulent charges between July 15-31, 2024.

20. Majority of charges were made at three different camera stores on July 17, 23, and 26.

21. Plaintiff had never made similar significant purchases in the past.

22. Plaintiff disputed charges with TD Bank five times using multiple methods.
23. TD Bank wrongly suggested her non-existent son made the charges.
24. Plaintiff filed a police report and obtained video footage of the thieves.
25. TD Bank refused to correct charges, insisting they were valid due to chip usage.
26. Plaintiff sent written disputes to all three credit reporting agencies on December 9, 2024.
27. Credit reporting agencies forwarded disputes to TD Bank who merely verified the amounts.
28. Each credit reporting agency failed to conduct reasonable investigation.
29. All defendant credit reporting agencies continue to inaccurately report the fraudulent charges.
30. Plaintiff has been denied credit due to the inaccurate reporting.
31. Plaintiff has had current credit limits reduced.
32. Plaintiff has suffered damage to reputation and adverse impact on credit rating.
33. Plaintiff has experienced emotional distress, annoyance, aggravation, and frustration.
34. Plaintiff has expended substantial time and resources attempting to resolve these issues.

CAUSES OF ACTION

FIRST CAUSE OF ACTION: Violation of the FCRA

15 U.S.C. § 1681e(b): The CRA failed to follow reasonable procedures to ensure the maximum possible accuracy of the information in a consumer's credit report, resulting in the reporting of inaccurate information. [cite: 47, 51]

15 U.S.C. § 1681i(a): After receiving a dispute from a consumer, the CRA negligently failed to conduct a reasonable reinvestigation to determine whether the disputed information was inaccurate. [cite: 48]

15 U.S.C. § 1681s-2(b): After receiving notice of a dispute from a CRA, the furnisher of information (e.g., a bank) negligently failed to conduct its own reasonable investigation into the disputed information. [cite: 54]

SECOND CAUSE OF ACTION: Violation of the NY FCRA

N.Y. GBL § 380-f: The CRA violated the New York Fair Credit Reporting Act by failing to conduct a reasonable reinvestigation after the consumer disputed erroneous information. [cite: 62]

N.Y. GBL § 380-f(b), (d): The CRA violated the New York Fair Credit Reporting Act by failing to delete or modify disputed information after it could not be verified. [cite: 63, 64]

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

1. Grant Plaintiff Actual damages;
2. Grant Plaintiff Statutory damages;
3. Grant Plaintiff Punitive damages;

4. An order requiring defendants to correct the plaintiff's credit report;
5. An order requiring defendants to implement policies to prevent future violations;
6. Grant Plaintiff Litigation costs;
7. Grant Plaintiff Reasonable attorney's fees;
7. Grant Plaintiff such other and further relief as this Court deems just and proper.

THE PLAINTIFF DEMANDS A JURY TRIAL ON ALL CAUSES OF ACTION ASSERTED HEREIN.

Dated: Respectfully submitted,
04/05/2025

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Admitted to practice before this
Court