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<html lang="en">
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  <meta charset="UTF-8">
  <title>Complaint</title>
  <style>
    /* Import Inter font to match review data page */
    @import url('https://fonts.googleapis.com/css2?
family=Inter:wght@400;500;600;700&display=swap');

    body {
      font-family: 'Inter', sans-serif;
      margin: 1in 1.25in; /* top/bottom: 1in, left/right: 1.25in */
      line-height: 1.6;
      color: #374151;
    }
    .caption { text-align: center; font-weight: bold; }
    .case-number { text-align: right; }
    .section-title { font-weight: bold; text-align: center; margin-top:
20px; }
    p { margin-bottom: 10px; line-height: 1.5; }
  </style>
</head>
<body>
  <div class="caption">
    UNITED STATES DISTRICT COURT<br>
    EASTERN DISTRICT OF NEW YORK
  </div>

  <div class="case-number">
    Case No. 1:25-cv-02100
  </div>

  <!-- ASCII Art Header Line -->
  <div style="font-family: monospace; font-size: 14px; margin: 10px 0;">
    -----X
  </div>

  <p>
    Carlos Rodriguez,<br>
    Plaintiff,<br>
    vs.<br>

    CHASE BANK, N.A. (Delaware corporation, authorized to do
business in New York),<br>

    EQUIFAX INFORMATION SERVICES, LLC,<br>

    CITIBANK, N.A.,<br>

    EXPERIAN INFORMATION SOLUTIONS, INC. (Ohio corporation,
authorized to do business in New York),<br>

    TRANS UNION, LLC (Delaware corporation, authorized to do
business in New York),<br>

    JPMORGAN CHASE BANK, N.A.,<br>

    TRANSUNION CONSUMER SOLUTIONS,<br>

    WELLS FARGO BANK, N.A.,<br>

```

YOUR SCORE WAS,

EQUIFAX INFORMATION SERVICES, LLC,

EQUIFAX INFORMATION SERVICES, LLC (Georgia corporation,
authorized to do business in New York),

CHASE BANK, N.A.,

CARLOS RODRIGUEZ,

TRANS UNION, LLC,

TRANS UNION, LLC,

EXPERIAN INFORMATION SOLUTIONS, INC.,

DISCOVER BANK,

CAPITAL ONE, N.A.

Defendants.

</p>

<!-- ASCII Art Footer Line -->

<div style="font-family: monospace; font-size: 14px; margin: 10px 0;">

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</div>

<div class="section-title">COMPLAINT</div>

<div class="section-title">PRELIMINARY STATEMENT</div>

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

<div class="section-title">PARTIES</div>

<p>1. Plaintiff Carlos Rodriguez is an individual residing in 1234 Bay
Ridge Avenue, Brooklyn, NY 11209.</p>

<p>2. Defendant CHASE BANK, N.A. (Delaware corporation, authorized to
do business in New York) is a Furnisher of Information.</p>

<p>3. Defendant EQUIFAX INFORMATION SERVICES, LLC is a Consumer
Reporting Agency.</p>

<p>4. Defendant CITIBANK, N.A. is a Furnisher of Information.</p>

<p>5. Defendant EXPERIAN INFORMATION SOLUTIONS, INC. (Ohio corporation,
authorized to do business in New York) is a Consumer Reporting Agency.</p>

<p>6. Defendant TRANS UNION, LLC (Delaware corporation, authorized to
do business in New York) is a Consumer Reporting Agency.</p>

<p>7. Defendant JPMORGAN CHASE BANK, N.A. is a Furnisher of
Information.</p>

<p>8. Defendant TRANSUNION CONSUMER SOLUTIONS is a Consumer Reporting
Agency.</p>

<p>9. Defendant WELLS FARGO BANK, N.A. is a Furnisher of Information.

</p>

<p>10. Defendant YOUR SCORE WAS is a Individual Defendant.</p>

<p>11. Defendant EQUIFAX INFORMATION SERVICES, LLC is a Consumer Reporting Agency.</p>

<p>12. Defendant EQUIFAX INFORMATION SERVICES, LLC (Georgia corporation, authorized to do business in New York) is a Consumer Reporting Agency.</p>

<p>13. Defendant CHASE BANK, N.A. is a Furnisher of Information.</p>

<p>14. Defendant CARLOS RODRIGUEZ is a Individual Defendant.</p>

<p>15. Defendant TRANS UNION, LLC is a Consumer Reporting Agency.</p>

<p>16. Defendant TRANS UNION, LLC is a Consumer Reporting Agency.</p>

<p>17. Defendant EXPERIAN INFORMATION SOLUTIONS, INC. is a Consumer Reporting Agency.</p>

<p>18. Defendant DISCOVER BANK is a Furnisher of Information.</p>

<p>19. Defendant CAPITAL ONE, N.A. is a Individual Defendant.</p>

<!-- Factual Background Section -->

<div class="section-title">FACTUAL BACKGROUND</div>

<div class="numbered-paragraphs">

<p>14. Plaintiff Carlos Rodriguez is an individual consumer under the FCRA and NY FCRA, residing in Brooklyn, NY.</p>

<p>15. Plaintiff has maintained a very good credit history throughout his financial life.</p>

<p>16. Plaintiff discovered credit reporting errors when applying for a car loan in April 2025.</p>

<p>17. Plaintiff's credit reports incorrectly included information for a different person, "Carlos J. Rodriguez."</p>

<p>18. The erroneous information included a Chase Sapphire credit card showing as a charge-off with approximately \$8,200 balance.</p>

<p>19. Plaintiff has never had a Chase Sapphire credit card or any account with Chase Bank, N.A.</p>

<p>20. Plaintiff sent written disputes to all three credit reporting agencies around February 15, 2025.</p>

<p>21. Plaintiff's dispute letters included a copy of his driver's license showing middle initial "M" and social security card to prove his identity.</p>

<p>22. Plaintiff also called Chase Bank directly and was told they would investigate but no corrective action was taken.</p>

<p>23. All three credit reporting agencies and Chase Bank verified the erroneous debt as belonging to Plaintiff.</p>

<p>24. Defendants failed to notice the different middle initial or address history associated with the fraudulent account.</p>

<p>25. Defendants failed to conduct reasonable investigations of Plaintiff's clearly documented disputes.</p>

<p>26. The erroneous information continues to appear on Plaintiff's credit reports causing ongoing harm.</p>

</div>

<!-- Causes of Action Section -->

<div class="section-title">CAUSES OF ACTION</div>

<div class="cause-of-action">

<h3>FIRST CAUSE OF ACTION: Violation of the FCRA</h3>

<!-- Only render selected claims -->

<div class="legal-claim">

<p>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]</p>

</div>

<div class="legal-claim">

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

Only render selected claims

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 Section

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;

<p>5. An order requiring defendants to implement policies to prevent future violations;</p>

<p>6. Grant Plaintiff Litigation costs;</p>

<p>7. Grant Plaintiff Reasonable attorney's fees;</p>

<p>7. Grant Plaintiff such other and further relief as this Court deems just and proper.</p>

<!-- Jury Demand -->

<div style="margin-top: 40px;">
<p>THE PLAINTIFF DEMANDS A JURY TRIAL ON ALL CAUSES OF ACTION ASSERTED HEREIN.</p>
</div>

<!-- Attorney Signature Block -->
<div style="margin-top: 60px;">
<table style="width: 100%; border-collapse: collapse;">
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<td style="width: 50%; vertical-align: top;">
<p>Dated: 04/05/2025</p>
</td>
<td style="width: 50%; vertical-align: top; text-align: left;">
<p>Respectfully submitted,</p>

<p>Mallon Consumer Law Group, PLLC
238 Merritt Drive
Oradell, NJ. 07649
(917) 734-6815
kmallon@consmerprotectionfirm.com
Admitted to practice before this Court</p>
</td>
</tr>
</table>
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</body>
</html>