

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

Case No. 1:25-cv-01987

Eman Youssef,

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES, LLC,

TD BANK, N.A.,

TRANS UNION, LLC,

EXPERIAN INFORMATION SOLUTIONS, INC.

Defendants.

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, PHONE: 555-123-4567, NY Not specified.
2. Defendant EQUIFAX INFORMATION SERVICES, LLC is a Consumer Reporting Agency.
3. Defendant TD BANK, N.A. is a Furnisher of Information.
4. Defendant TRANS UNION, LLC is a Consumer Reporting Agency.
5. Defendant EXPERIAN INFORMATION SOLUTIONS, INC. is a Consumer Reporting Agency.

FACTUAL BACKGROUND

14. Plaintiff Eman Youssef is an individual consumer under the FCRA and NY FCRA.
15. Plaintiff opened a TD Bank credit card account in July 2023 with an \$8,000 credit limit.
16. Plaintiff maintained timely payments on her account prior to the fraudulent activity.

17. Plaintiff travelled to Egypt from June 30, 2024 through July 30, 2024 with family.
18. Before traveling, Plaintiff informed TD Bank of her trip and verified card functionality.
19. Plaintiff brought both physical cards with her to Egypt.
20. Identity thieves used Plaintiff's account to make over \$7,700 in fraudulent charges.
21. Fraudulent charges occurred between July 15, 2024 and July 31, 2024.
22. Majority of fraudulent charges were made at three different camera stores.
23. Plaintiff had never made similar significant purchases in the past.
24. Plaintiff disputed charges with TD Bank five separate times using multiple methods.
25. TD Bank wrongfully suggested Plaintiff's non-existent son made the charges.
26. Plaintiff filed a police report and obtained video evidence of the perpetrators.
27. TD Bank refused to correct charges, insisting they were valid due to chip usage.
28. Plaintiff sent written disputes to all three credit reporting agencies on December 9, 2024.
29. Plaintiff provided proof she was in Egypt when charges were made.
30. Credit reporting agencies forwarded disputes to TD Bank without independent investigation.
31. TD Bank merely verified the disputed amounts without reasonable investigation.
32. All credit reporting agencies failed to conduct reasonable reinvestigations.
33. Defendants continue to report the fraudulent charges as valid on Plaintiff's credit reports.
34. Plaintiff has been denied credit applications due to the inaccurate reporting.
35. Plaintiff has had existing credit limits reduced due to the false information.
36. Plaintiff has suffered damage to her credit rating and reputation.
37. Plaintiff has experienced significant emotional distress from Defendants' actions.
38. Plaintiff has expended substantial time and resources attempting to resolve the 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. § 1681e(b): The CRA willfully failed to follow reasonable procedures to ensure the maximum possible accuracy of the information in a consumer's credit report. This implies a knowing or reckless disregard for the law.

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: 04/05/2025

Respectfully submitted,

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Admitted to practice before this Court