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<!DOCTYPE html>
<html lang="en">
<head>
  <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-01987
  </div>

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

  <p>
    EMAN YOUSSEF,<br>
    Plaintiff,<br>
    vs.<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>

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

    EQUIFAX INFORMATION SERVICES, LLC (Georgia corporation,
authorized to do business in New York)
    <br>
    Defendants.
  </p>

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

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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 EMAN YOUSSEF is an individual residing in 22-15 22nd Street, East Elmhurst, NY 11370.</p>

<p>2. Defendant EXPERIAN INFORMATION SOLUTIONS, INC. (Ohio corporation, authorized to do business in New York) is a Consumer Reporting Agency.</p>

<p>3. Defendant TRANS UNION, LLC (Delaware corporation, authorized to do business in New York) is a Consumer Reporting Agency.</p>

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

<p>5. Defendant EQUIFAX INFORMATION SERVICES, LLC (Georgia corporation, authorized to do business in New York) is a Consumer Reporting Agency.</p>

<!-- Factual Background Section -->

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

<div class="numbered-paragraphs">

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

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

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

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

<p>18. Plaintiff had two physical cards and brought both to Egypt.</p>

<p>19. Imposters used her account to make over ,700 in fraudulent charges between July 15–31, 2024.</p>

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

<p>21. Plaintiff had never made similar significant purchases in the past.</p>

<p>22. Plaintiff disputed charges with TD Bank five times using multiple methods.</p>

<p>23. TD Bank wrongly suggested her non-existent son made the charges.</p>

<p>24. Plaintiff filed a police report and obtained video footage of the thieves.</p>

<p>25. TD Bank refused to correct charges, insisting they were valid due to chip usage.</p>

<p>26. Plaintiff sent written disputes to all three credit reporting agencies on December 9, 2024.</p>

<p>27. Credit reporting agencies forwarded disputes to TD Bank who merely verified the amounts.</p>

<p>28. Each credit reporting agency failed to conduct reasonable investigation.</p>

<p>29. All defendant credit reporting agencies continue to inaccurately report the fraudulent charges.</p>

<p>30. Plaintiff has been denied credit due to the inaccurate reporting.</p>

<p>31. Plaintiff has had current credit limits reduced.</p>

<p>32. Plaintiff has suffered damage to reputation and adverse impact on credit rating.</p>

<p>33. Plaintiff has experienced emotional distress, annoyance, aggravation, and frustration.</p>

<p>34. Plaintiff has expended substantial time and resources attempting to resolve these issues.</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">

<p>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]</p>

</div>

<div class="legal-claim">

<p>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]</p>

</div>

</div>

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

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

<!-- Only render selected claims -->

<div class="legal-claim">

<p>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]</p>

</div>

<div class="legal-claim">

<p>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]</p>

</div>

</div>

<!-- Prayer for Relief Section -->
<div class="section-title">PRAYER FOR RELIEF</div>
<p>WHEREFORE, Plaintiff respectfully requests that this Court:</p>

<p>1. Grant Plaintiff Actual damages;</p>

<p>2. Grant Plaintiff Statutory damages;</p>

<p>3. Grant Plaintiff Punitive damages;</p>

<p>4. An order requiring defendants to correct the plaintiff's credit report;</p>

<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 -->
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<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@consumerprotectionfirm.com
Admitted to practice before this Court</p>
</td>
</tr>
</table>

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</body>

</html>