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  <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;
      line-height: 1.6;
      color: #374151;
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    .caption { text-align: center; font-weight: bold; }
    .case-number { text-align: right; }
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20px; }
    p { margin-bottom: 10px; line-height: 1.5; }
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<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>

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

    CHASE BANK, N.A. (Delaware 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;">
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x

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

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

<p>4. Defendant TRANS UNION, LLC (Delaware corporation, authorized to do business in New York) is a Consumer Reporting Agency.</p>

<p>5. Defendant CHASE BANK, N.A. (Delaware corporation, authorized to do business in New York) is a Furnisher of Information.</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 -->
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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@consmerprotectionfirm.com
Admitted to practice before this Court</p>
</td>
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</html>