```
<!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;">
    </div>
    >
        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)
        <hr>
        Defendants.
    <!-- ASCII Art Footer Line -->
    <div style="font-family: monospace; font-size: 14px; margin: 10px 0;">
```

</div>

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

<div class="section-title">PARTIES</div>
1. Plaintiff EMAN YOUSSEF is an individual residing in 22-15 22nd Street, East Elmhurst, NY 11370.

- <p. Defendant EXPERIAN INFORMATION SOLUTIONS, INC. (Ohio corporation, authorized to do business in New York) is a Consumer Reporting Agency.</p>
- <3. Defendant TRANS UNION, LLC (Delaware corporation, authorized to
 do business in New York) is a Consumer Reporting Agency.</p>
- <4. Defendant TD BANK, N.A. (Delaware corporation, authorized to do business in New York) is a Furnisher of Information.
- <p. Defendant EQUIFAX INFORMATION SERVICES, LLC (Georgia corporation, authorized to do business in New York) is a Consumer Reporting Agency.</p>

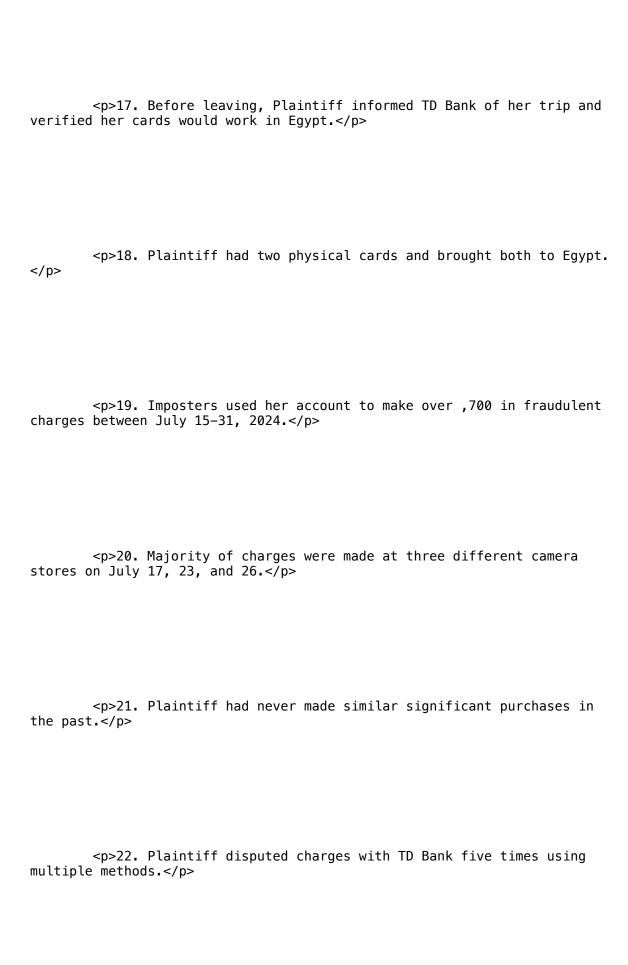
<!-- Factual Background Section --> <div class="section-title">FACTUAL BACKGROUND</div>

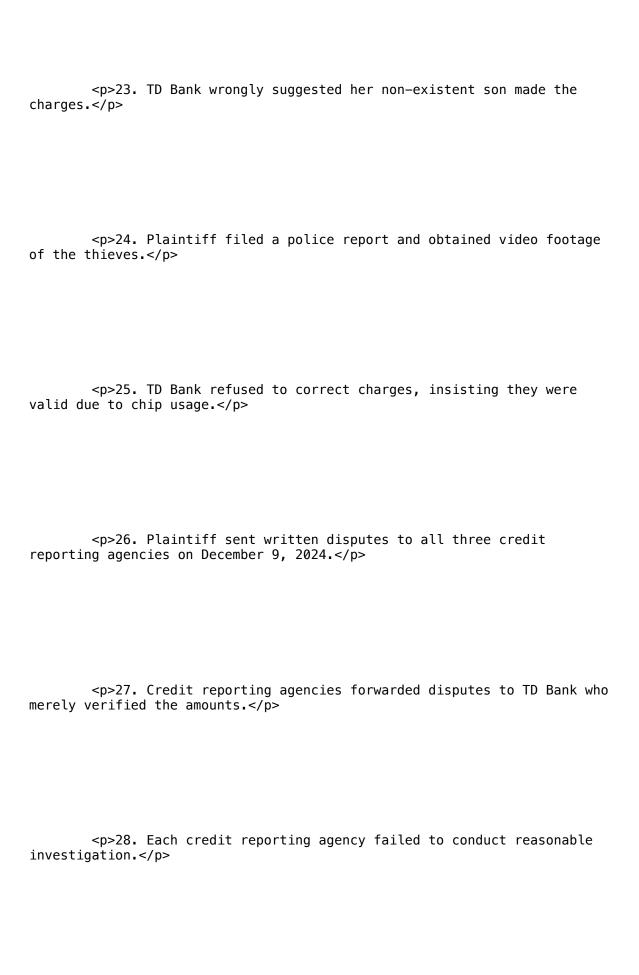
<div class="numbered-paragraphs">

 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.





>29. All defendant credit reporting agencies continue to inaccurately report the fraudulent charges. < Plaintiff has been denied credit due to the inaccurate</p> 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. </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">

</div>

<div class="legal-claim">

</div>

<div class="legal-claim">

</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">

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]

</div>

<div class="legal-claim">

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]

</div>

</div>

```
<!-- Prayer for Relief Section -->
   <div class="section-title">PRAYER FOR RELIEF</div>
   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.
   <!-- Jury Demand -->
   <div style="margin-top: 40px;">
      <strong>THE PLAINTIFF DEMANDS A JURY TRIAL ON ALL CAUSES OF
ACTION ASSERTED HEREIN.</strong>
   </div>
   <!-- Attorney Signature Block -->
   <div style="margin-top: 60px;">
      Dated: 04/05/2025
             <td style="width: 50%; vertical-align: top; text-align:
left;">
                Respectfully submitted,
                Mallon Consumer Law Group, PLLC<br>
                238 Merritt Drive<br>
                Oradell, NJ. 07649<br>
                (917) 734-6815<br>
                kmallon@consmerprotectionfirm.com<br>
                Admitted to practice before this Court
```

</div>

</body>