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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 */
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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;
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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; }
  </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>

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

    EQUIFAX INFORMATION SERVICES, LLC,<br>

    TRANS UNION, LLC,<br>

    TD BANK, N.A.,<br>

    EXPERIAN INFORMATION SOLUTIONS, INC.,<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>

    EXPERIAN INFORMATION SOLUTIONS, INC. (Ohio corporation,

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authorized to do business in New York)

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

<p>2. Defendant TRANS UNION, LLC (Delaware corporation, authorized to do business in New York) is a Consumer Reporting Agency.</p>

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

<p>4. Defendant TRANS UNION, LLC is a Consumer Reporting Agency.</p>

<p>5. Defendant TD BANK, N.A. is a Furnisher of Information.</p>

<p>6. Defendant EXPERIAN INFORMATION SOLUTIONS, INC. is a Consumer Reporting Agency.</p>

<p>7. Defendant TD BANK, N.A. (Delaware corporation, authorized to do business in New York) is a Furnisher of Information.</p>

<p>8. Defendant EQUIFAX INFORMATION SERVICES, LLC (Georgia corporation, authorized to do business in New York) is a Consumer Reporting Agency.</p>

<p>9. Defendant EXPERIAN INFORMATION SOLUTIONS, INC. (Ohio 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 style="border: 1px solid #ffa500; background-color: #fff3cd; padding: 10px; margin: 10px 0;">

<p style="color: #856404;">⚠ No legal claims selected for this cause of action.</p>

<p style="color: #856404; font-size: 0.9em;">Please review and select applicable claims in the dashboard.</p>

</div>

</div>

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

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

<!-- Only render selected claims -->

<div style="border: 1px solid #ffa500; background-color: #fff3cd; padding: 10px; margin: 10px 0;">

<p style="color: #856404;">⚠ No legal claims selected for this cause of action.</p>

<p style="color: #856404; font-size: 0.9em;">Please review and select applicable claims in the dashboard.</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@consmerprotectionfirm.com

Admitted to practice before this Court</p>
</td>
</tr>
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</body>
</html>