NAME: EMAN YOUSSEF  
ADDRESS:  
22-15 22nd Street  
East Elmhurst, NY 11370  
PHONE:  
555-123-4567  
CASE\_NUMBER: 1:25-cv-01987  
COURT\_NAME: UNITED STATES DISTRICT COURT  
COURT\_DISTRICT: EASTERN DISTRICT OF NEW YORK  
FILING\_DATE: April 9, 2025  
DEFENDANTS:  
- TD BANK, N.A. (Delaware corporation, authorized to do business in New York)  
- EQUIFAX INFORMATION SERVICES, LLC (Georgia corporation, authorized to do business in New York)  
- EXPERIAN INFORMATION SOLUTIONS, INC. (Ohio corporation, authorized to do business in New York)  
- TRANS UNION, LLC (Delaware corporation, authorized to do business in New York)

STRUCTURED\_DATA:  
KEY\_DATES:  
- Account Opening: July 2023  
- Travel Period: June 30, 2024 through July 30, 2024  
- Fraudulent Charges: July 15-31, 2024  
- Camera Store Charges: July 17, 23, and 26, 2024  
- Credit Discovery: December 2024  
- Dispute Date: December 9, 2024  
- Filing Date: April 9, 2025  
  
DAMAGES:  
Financial Harm:  
- Being denied credit  
- Having current credit limits reduced  
- Limiting opportunities for credit  
Reputational Harm:  
- Damage to reputation  
- Adverse impact on credit rating  
Emotional Harm:  
- Emotional distress  
- Annoyance  
- Aggravation  
- Frustration  
Personal Costs:  
- Expenditure of time and resources  
  
LEGAL\_CLAIMS:  
Count 1 - FCRA Violations:  
- 15 U.S.C. § 1681i: Failure to conduct reasonable reinvestigations (Equifax, Experian, TransUnion)  
- 15 U.S.C. § 1681i(a)(4): Failure to review all relevant information (Equifax, Experian, TransUnion)  
- 15 U.S.C. § 1681i(a)(5): Failure to delete disputed erroneous information (Equifax, Experian, TransUnion)  
- 15 U.S.C. § 1681s-2(b): Failure to conduct reasonable reinvestigations (TD Bank)  
- 15 U.S.C. § 1681s-2(b)(1)(B): Failure to review relevant information (TD Bank)  
Count 2 - NY FCRA Violations:  
- N.Y. GBL § 380–j(a)(3): Including known erroneous information (Equifax, Experian, TransUnion)  
- N.Y. GBL § 380-f: Failure to conduct reasonable reinvestigations (Equifax, Experian, TransUnion)  
- N.Y. GBL §§ 380-f(b) and (d): Failure to delete disputed information (Equifax, Experian, TransUnion)  
  
RELIEF\_SOUGHT:  
- Actual damages  
- Statutory damages  
- Punitive damages  
- Litigation costs  
- Reasonable attorney's fees  
- Injunctive relief requiring removal of erroneous information  
- Implementation of compliance policies  
- Jury trial demanded  
  
BACKGROUND:  
1. Plaintiff Eman Youssef is an individual consumer under the FCRA and NY FCRA, residing in the State of New York, borough of Manhattan.  
2. Plaintiff opened a TD Bank credit card account on or around July 2023 with an ,000 credit limit.  
3. Plaintiff travelled to Egypt with her family from June 30, 2024 through July 30, 2024.  
4. Before leaving, Plaintiff informed TD Bank of her trip and verified her cards would work in Egypt.  
5. Plaintiff had two physical cards and brought both to Egypt.  
6. Imposters used her account to make over ,700 in fraudulent charges between July 15-31, 2024.  
7. Majority of charges were made at three different camera stores on July 17, 23, and 26.  
8. Plaintiff had never made similar significant purchases in the past.  
9. Plaintiff disputed charges with TD Bank five times using multiple methods.  
10. TD Bank wrongly suggested her non-existent son made the charges.  
11. Plaintiff filed a police report and obtained video footage of the thieves.  
12. TD Bank refused to correct charges, insisting they were valid due to chip usage.  
13. Plaintiff sent written disputes to all three credit reporting agencies on December 9, 2024.  
14. Credit reporting agencies forwarded disputes to TD Bank who merely verified the amounts.  
15. Each credit reporting agency failed to conduct reasonable investigation.  
16. All defendant credit reporting agencies continue to inaccurately report the fraudulent charges.  
17. Plaintiff has been denied credit due to the inaccurate reporting.  
18. Plaintiff has had current credit limits reduced.  
19. Plaintiff has suffered damage to reputation and adverse impact on credit rating.  
20. Plaintiff has experienced emotional distress, annoyance, aggravation, and frustration.  
21. Plaintiff has expended substantial time and resources attempting to resolve these issues.