

# Complaint

## Caption

jeanne v. American Express  
Court: (atlanta, GA)

## Complaint

### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

\*\*JEANNE,\*\*  
Plaintiff,

v.

\*\*AMERICAN EXPRESS,\*\*  
Defendant.

\*\*COMPLAINT\*\*

\*\*JURISDICTION AND VENUE\*\*

1. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 because this action arises under the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681 et seq. This Court also has supplemental jurisdiction over state law claims pursuant to 28 U.S.C. § 1367.
2. Venue is proper in this district under 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to the claim occurred in this district, and Plaintiff resides in Atlanta, Georgia.

\*\*PARTIES\*\*

3. Plaintiff, Jeanne, is an individual residing at 333 Bully Dr, Atlanta, GA.
4. Defendant, American Express, is a furnisher of information to consumer reporting agencies ("CRAs") within the meaning of 15 U.S.C. § 1681s-2 and is subject to the jurisdiction of this Court.

\*\*FACTS\*\*

5. On June 16, 2025, Plaintiff disputed information with the CRAs, with tracking number 776666.
6. On June 25, 2025, Plaintiff requested the Method of Verification from the CRAs, with tracking number 788899.
7. On October 10, 2025, Plaintiff requested the Automated Credit Dispute Verification ("ACDV") record from the CRAs, with tracking number 77677.
8. On October 11, 2025, the CRAs responded to Plaintiff's dispute, stating that the information was "verified."
9. On October 11, 2025, Plaintiff and Defendant formed a Credit Card agreement governed by Georgia law.
10. Plaintiff performed or was ready, willing, and able to perform under the terms of the Credit Card agreement.
11. Plaintiff suffered concrete harms, including loss of time, emotional distress, and credit confusion.
12. Plaintiff's actual damages are currently calculated at \$15,000.00, subject to update.

13. Defendant received notice of Plaintiff's dispute via the CRA reinvestigation process.
14. Defendant failed to reasonably investigate all pertinent information related to Plaintiff's dispute.
15. Despite Plaintiff's disputes and follow-up, inaccurate information remained on Plaintiff's credit report.
16. Plaintiff mitigated harm by sending additional disputes and requests to the Defendant and CRAs.
17. Plaintiff reserves the right to assert additional factual allegations pending initial disclosures and discovery.

**\*\*COUNTS\*\***

**\*\*COUNT I: VIOLATION OF THE FAIR CREDIT REPORTING ACT, 15 U.S.C. § 1681s-2(b)\*\***

18. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
19. Defendant, as a furnisher of information to CRAs, had a duty under 15 U.S.C. § 1681s-2(b) to conduct a reasonable investigation of disputed information upon receiving notice of a dispute from a CRA.
20. Defendant breached this duty by failing to conduct a reasonable investigation of the disputed information, as evidenced by the continued reporting of inaccurate information despite Plaintiff's disputes and follow-up.
21. As a direct and proximate result of Defendant's violation of the FCRA, Plaintiff suffered concrete harms, including loss of time, emotional distress, and credit confusion, and is entitled to actual damages, statutory damages, and punitive damages.

**\*\*PRAYER FOR RELIEF\*\***

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and against Defendant, granting the following relief:

- A. Actual damages in the amount of \$15,000.00, subject to update;
- B. Statutory damages as provided by 15 U.S.C. § 1681n;
- C. Punitive damages as provided by 15 U.S.C. § 1681n;
- D. Costs of this action;
- E. Such other and further relief as the Court deems just and proper.

**\*\*DEMAND FOR JURY TRIAL\*\***

Plaintiff demands a trial by jury on all issues so triable.

DATED: [Insert Date]

Respectfully submitted,

[Plaintiff's Attorney's Name]  
[Plaintiff's Attorney's Address]  
[Plaintiff's Attorney's Phone Number]  
[Plaintiff's Attorney's Email Address]  
Attorney for Plaintiff

**Damages Summary**

Actual base \$15000.00; time value \$0.00; costs \$0.00; interest \$0.00; total \$15000.00.

## **Table of Authorities**

### **Statutes:**

- 15 U.S.C. § 1681
- 15 U.S.C. § 1681n
- 15 U.S.C. § 1681s-2
- 28 U.S.C. § 1331
- 28 U.S.C. § 1367
- 28 U.S.C. § 1391