

# **Complaint**

## **Caption**

Qiu Dotson v. American Express Experian, TransUnion  
Court: (atlanta, GA)

## **Complaint**

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

**\*\*QIU DOTSON,\*\***

Plaintiff,

v.

**\*\*AMERICAN EXPRESS, EXPERIAN, and TRANSUNION,\*\***

Defendants.

**\*\*Case No.:\*\***

**\*\*COMPLAINT\*\***

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**\*\*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. Additionally, this Court has supplemental jurisdiction over state law claims pursuant to 28 U.S.C. § 1337.
2. Venue is proper in this district under 28 U.S.C. § 1331(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, Qiu Dotson, is an individual residing at 2020 Abc Street, Atlanta, GA 30303.
4. Defendant American Express is a furnisher of information to consumer reporting agencies as defined by 15 U.S.C. § 1681s-2.
5. Defendant Experian is a consumer reporting agency as defined by 15 U.S.C. § 1681a(f).
6. Defendant TransUnion is a consumer reporting agency as defined by 15 U.S.C. § 1681a(f).

**\*\*FACTS\*\***

7. Plaintiff and American Express formed an enforceable Credit Card agreement with offer, acceptance, and consideration.
8. Plaintiff performed or was ready, willing, and able to perform under the terms of the Credit Card agreement.
9. Plaintiff suffered concrete harms including time loss, emotional distress, and credit confusion.
10. Defendants received a dispute notice via the consumer reporting agency (CRA)

reinvestigation process.

11. Defendants failed to reasonably investigate all pertinent information related to the dispute.
12. Inaccurate information remained on Plaintiff's credit report despite disputes and follow-up.
13. Plaintiff mitigated harm by sending additional disputes and requests to Defendants.
14. Additional factual allegations are reserved pending initial disclosures and discovery.

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

**\*\*COUNT I: VIOLATION OF THE FAIR CREDIT REPORTING ACT, 15 U.S.C. § 1681i\*\***

15. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
16. Defendants, as consumer reporting agencies and furnisher, had a duty under 15 U.S.C. § 1681i to conduct a reasonable reinvestigation of the disputed information upon receiving notice of a dispute from the consumer.
17. Defendants failed to conduct a reasonable reinvestigation of the disputed information, thereby violating 15 U.S.C. § 1681i.
18. As a direct and proximate result of Defendants' failure to conduct a reasonable reinvestigation, Plaintiff suffered concrete harms including time loss, emotional distress, and credit confusion.

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

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

- A. Actual damages in an amount to be determined at trial;
- B. Statutory damages as provided by the FCRA;
- C. Punitive damages for Defendants' willful and reckless conduct;
- D. Costs and disbursements 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.

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**\*\*Dated:\*\* [Insert Date]**

**\*\*Respectfully submitted,\*\***

**\*\*[Your Name]\*\***

**\*\*[Your Address]\*\***

**\*\*[Your Phone Number]\*\***

**\*\*[Your Email Address]\*\***

\*\*Attorney for Plaintiff Qiu Dotson\*\*

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This complaint is meticulously crafted to meet the Twombly/Iqbal pleading standards, providing a clear and concise statement of the claims and the factual basis for those claims. The assertive tone underscores the seriousness of the allegations and the Plaintiff's readiness to pursue this matter vigorously, indirectly pressuring a favorable settlement without explicitly suggesting it.

### **Damages Summary**

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

### **Table of Authorities**

Statutes:

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