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UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA

William R. Hall, Jr., individually and as a representative of the classes,

Plaintiff,

v.

TransUnion Rental Screening Solutions, Inc.,

Defendant.

COMPLAINT – CLASS ACTION

Case No.

JURY TRIAL DEMANDED

COMES NOW, William R. Hall, Jr. ("Plaintiff"), on behalf of himself and the classes set forth below and states as follows:

INTRODUCTION

1. This is a class action for damages, costs and attorneys' fees brought against Defendant TransUnion Rental Screening Solutions, Inc., ("Defendant" or "TU Rental") pursuant to the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* ("FCRA").

2. Defendant is a consumer reporting agency that compiles and maintains files on consumers on a nationwide basis. It sells consumer reports generated from its database and furnishes these consumer reports to landlords who use the reports to make decisions regarding whether to rent to certain consumers.

3. Defendant falsely reported to Plaintiff's potential landlord that Plaintiff had been convicted of a serious sexual offense. In fact, the conviction reported belonged to an entirely different individual with a similar name to Plaintiff. The individual who was actually convicted of the sexual offense was born more than 30 years before Plaintiff, has a different name than Plaintiff, and has a vastly different physical description from Plaintiff.

4. Defendant's reporting cost Plaintiff his chance to rent the property of his choice, caused him serious distress and embarrassment, and caused him financial loss.

5. Defendant's failure to require matching on anything other than an individual's name is a predictable cause of mismatches like that suffered by Plaintiff, and could have been easily remedied had Defendant consulted more comprehensive data sources.

6. Defendant does not employ reasonable procedures to ensure the maximum possible accuracy of its records. Its failure to employ reasonable procedures resulted in Plaintiff's report being inaccurate.

7. On behalf of himself and a class of similarly situated individuals, Plaintiff brings claims pursuant to § 1681e(b) of the FCRA.

8. When Plaintiff requested a copy of his file in an attempt to pinpoint the

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source of the error, Defendant reported inaccurate and contradictory information about the source of the reported record. Because of this, on behalf of himself and a class of similarly situated individuals, Plaintiff brings claims pursuant to § 1681g of the FCRA.

PARTIES AND JURISDICTION

9. Individual and representative Plaintiff William R. Hall, Jr., is a resident of Canton, Georgia.

10. Plaintiff is a natural person and a "consumer" as protected and governed by the FCRA.

11. Defendant TransUnion Rental Screening Solutions, Inc., provides consumer reports for rental screening purposes. Defendant sells background reports containing, *inter alia*, information about consumers' criminal backgrounds to prospective landlords. Defendant is a consumer reporting agency as contemplated by the FCRA, 15 U.S.C. § 1681a. Defendant is regularly engaged in the business of assembling, evaluating, and disbursing information concerning consumers for the purpose of furnishing consumer reports to third parties.

12. Among other things, Defendant provides background checks and credit reports to landlords for their use in deciding whether to rent to a prospective tenant. These reports are provided in connection with a business transaction initiated by the consumer.

13. Defendant is a Delaware corporation headquartered in Colorado.

14. The Court has personal jurisdiction over Defendant. Defendant conducts substantial business in this District, including issuing background checks and credit reports on residents of this District, including Plaintiff's report.

15. This Court has federal question jurisdiction over Plaintiff's claims pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p, which allows claims under the FCRA to be brought in any appropriate court of competent jurisdiction.

16. Venue is proper in this District pursuant to 28 U.S.C. § 1391 because Plaintiff resides in the District and because a substantial part of the events or omissions giving rise to the claim occurred in this District.

FACTUAL ALLEGATIONS RELATING TO PLAINTIFF

17. In early 2018, Plaintiff was hired as the manager of an auto dealership in Newnan, Georgia, to start work in August 2018. Because his new job was over an hour away from the home he owns with his family in Canton, Georgia, Plaintiff sought to rent a property in Newnan to use during the work week.

18. Plaintiff has a preference for renting newly-constructed property. In looking for such properties in Newnan, he found only one that met his needs, owned by non-party Gabriel Calderon. Ms. Calderon arranged for her daughter to show Plaintiff the property, and Plaintiff sought to rent the property for \$1500 a month.

On July 6, 2018, Ms. Calderon obtained a report from Defendant about
 Plaintiff. This report is attached as Exhibit A.

20. On that report, Defendant indicated that Plaintiff had been subject to one criminal "court action:" a charge of "CRIM SEX COND W/MINOR(1ST)" in Aiken County, South Carolina. (Ex. A at 5.)

21. Defendant's reporting was false. Plaintiff has no criminal record – and certainly has never been convicted of a sexual offense.

22. After receiving Defendant's report, Ms. Calderon cut off contact with Plaintiff and refused to rent to him.

23. Defendant also sent a copy of the report to Plaintiff. The report was received by mail and opened by Plaintiff's wife, causing Plaintiff considerable embarrassment and confusion.

24. In approximately five minutes on the internet, Plaintiff was able to pinpoint the flaw in Defendant's reporting: Defendant was reporting the conviction of another individual named William R. Hall, who had been born in 1936, convicted in 1994, and who is likely deceased. (*See* Ex. B.)

25. The other William Hall, besides having the same first and last name, has virtually no other links with Plaintiff. In addition to being born over 30 years

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after the other William Hall, Plaintiff is William Hall, *Jr.*, while the other William Hall is not. Further, Defendant reported a number of physical characteristics of the other William Hall, including a height of 5'8", a weight of 150 pounds, hazel eyes, grey hair and an olive complexion. None of these descriptors fits Plaintiff, and simply consulting Plaintiff's driver's license would confirm this.

26. Plaintiff was mortified that his potential landlord now thought he was a sex offender. He was further mortified when he considered that his potential landlord had arranged for their young daughter to give him a tour of the property.

27. In his new position as the general manager of an auto dealership, Plaintiff will be the face of the business, including appearing in advertising. Plaintiff is very concerned that the false perception that he is a sex offender will damage his effectiveness in his new job. Newnan, Georgia, is a small community, and Plaintiff has a real concern that false rumors, initiated by Defendant's erroneous reporting, could damage his standing in the community.

28. Having been denied the ability to rent his desired property, Plaintiff faced limited time to find a new rental before his employment began. He ended up renting a unit which is less desirable to him, because it is not new construction, which costs considerably more (\$2100 per month), and which is further from his work.

29. In August 2018, Plaintiff requested a copy of his file from Defendant

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pursuant to § 1681g of the FCRA. On the copy of his file that he received, Defendant states on page five that the "dataset" containing the sex offense was the "SC Dept of Corrections." However, on page 36, it indicates that the "[t]he public record sources used to generate the report(s) are as follows: South Carolina, Aiken County." (Ex. A.)

30. The South Carolina Department of Corrections is a different entity from Aiken County, South Carolina.

31. It is readily apparent that Defendant did not consult the Aiken County data in generating its report – if it had, it would have noticed that the individual convicted was more than 30 years older than Plaintiff. The information available on the Aikin County court's website includes a year of birth, but no physical description. (Ex. B.) The information reported by Defendant incudes a physical description, but lists "N/A" for both date of birth and age. (Ex. A.) It is clear, therefore, that Defendant consulted the Dep't of Corrections data, not the Aiken County data, when preparing its report, likely because that data was more readily available and/or more affordable.

32. Defendant misrepresented its sources of information when it stated that "[t]he public record sources used to generate the report(s) are as follows: South Carolina, Aiken County." (Ex. A.)

FACTS DEMONSTRATING THAT DEFENDANT WILLFULLY FAILED TO USE REASONABLE PROCEDURES TO ASSURE MAXIMUM POSSIBLE ACCURACY

33. If Defendant had reasonable procedures to ensure maximum possible accuracy, it would have determined that the sexual offense it reported did not belong to Plaintiff.

34. If Plaintiff was able to find the source of Defendant's error in five minutes on a court's website, Defendant should have been able to avoid that error in the first instance.

35. Defendant did not consult the readily available online court records before accusing Plaintiff of being convicted of a serious sexual offense. If it had, it would have avoided its error.

36. Instead, Defendant chose to rely on Department of Corrections data, which did not include any date of birth or age information. Defendant likely did this because this data was easier to access in bulk and/or more affordable than the court data.

37. Defendant appears to have erroneously matched Plaintiff with this conviction record based on insufficient data. Defendant's report makes clear that it did not have the convicted William Hall's date of birth, age, social security number or residence. (Ex. A at 5 (listing "N/A" for each field).) If Defendant had obtained

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any of those data fields, it would have discovered that Plaintiff was not a match.

38. If Defendant had even carefully considered the name, it would have discovered that Plaintiff was not a match: Plaintiff is William R. Hall, **Jr.**, and the convicted William R. Hall is not. It is also likely that Plaintiff and the convicted William R. Hall do not have the same middle name, only the same middle initial.

39. Defendant also ran a search which found that Plaintiff was not on any sex offender registry, a finding that contradicts Defendant's own reporting. (Ex. A at 34.) This contradiction, however, did not cause Defendant to reevaluate its erroneous reporting.

40. Other tenant screening agencies have faced governmental scrutiny for substantially similar activities. *See*, *e.g.*, *FTC v. Realpage*, *Inc.*, No 3:18-cv-2737 (FTC settlement with tenant screening agency which failed to comply with 15 U.S.C. § 1681e(b) because it used loose matching criteria to link potential tenants with criminal records).

FACTS DEMONSTRATING THAT DEFENDANT WILLFULLY FAILED TO IDENTIFY ITS SOURCE

41. Defendant, in its disclosure to Plaintiff, identified two different sources for the records it erroneously reported regarding Plaintiff. (*See supra* \P 29.)

42. Defendant made it appear as if it had consulted the court records at

issue, when it appears that it actually relied on a more readily available and/or more affordable record source which did not even include any information about date of birth or age.

43. It is important that Defendant clearly report its sources of information in response to \$1681g requests, so that consumers can correct erroneous information at the source, and/or identify why and how erroneous information about them is reported. If Defendant had actually consulted the sources that it claimed to consult, Defendant's reporting error would have been avoided.

44. Defendant has clearly failed to do so, as Defendant's disclosure is selfcontradictory. If Defendant was serious about complying with §1681g, it would review its disclosures for consistency and accuracy.

GENERAL FACTS REGARDING DEFENDANT'S WILLFULNESS

45. In addition to the conduct set forth above, Defendant's willful conduct is further reflected by, *inter alia*, the following:

- a. The FCRA was enacted in 1970; Defendant has had 48 years to become compliant;
- b. Defendant and its parent company have been repeatedly sued for

misreporting public record information.¹

- c. Defendant is a corporation with access to legal advice through its own general counsel's office and outside litigation counsel. Yet, there is no contemporaneous evidence that it determined that its conduct was lawful;
- d. Defendant knew or had reason to know that its conduct was inconsistent with FTC guidance, case law, and the plain language of the FCRA;
- e. Defendant voluntarily ran a risk of violating the law substantially greater than the risk associated with a reading that was merely careless;
- f. Defendant knew that matching individuals to criminal records using name only could and would result in false positives. However, it persisted in doing so;
- g. If Defendant had consulted the publicly available online court records, it would have easily discovered that Plaintiff was not the

¹ Anderson v. Trans Union LLC, No. 3:16-cv-588 (E.D. Va.); Clark v Trans Union LLC, No. 3:15-cv-391 (E.D. Va.); Walsh v. Trans Union, LLC, No. 6:18-cv-00166, (M.D. Fla.).

subject of the court record in questions. However, Defendant failed to do so;

- h. Defendant could and should have reviewed Plaintiff's 1681g disclosure for inaccurate and contradictory information; if it had done so, it would have accurately reported the source of the information at issue; and
- i. Defendant's violations of the FCRA were repeated and systematic.

46. At all times relevant hereto, Defendant's conduct was willful and carried out in knowing or reckless disregard for consumers' rights under the FCRA. Defendant's conduct was intentionally accomplished through its intended procedures; these procedures have continued despite the fact that other consumer reporting agencies have been subject to court decisions and consumer complaints critical of similar conduct; and Defendant will continue to engage in this conduct because it believes there is greater economic value in selling over-inclusive consumer reports than in producing accurate reports.

CLASS ACTION ALLEGATIONS

47. Plaintiff brings Count I as a class action pursuant to Fed. R. Civ. P. 23 on behalf of the Inaccurate Matching Class, defined as:

All individuals on whom Defendant prepared erroneous consumer reports including criminal records, where the information was included on the report based on a name match, to the exclusion of a match based on social security number and/or age. The class begins on the date two years prior to the filing of this Complaint and ends on the date the class list is prepared.

48. Plaintiff brings Count II as a class action pursuant to Fed. R. Civ. P. 23

on behalf of the §1681g Class, defined as:

All individuals who requested their file from Defendant, for whom the "Sources of Data" on the file disclosure does not match the "Dataset" listed on the report. The class begins on the date two years prior to the filing of this Complaint and ends on the date the class list is prepared.

49. Class certification is appropriate under Fed. R. Civ. P. 23(a).

50. <u>Numerosity:</u> The classes are so numerous that joinder of all class members is impracticable. Given the volume of Defendant's business, there are hundreds or thousands of class members.

51. <u>Typicality:</u> Plaintiff's claims are typical of the members of the classes.

It is typical for Defendant to match consumers to criminal records using name alone, and to produce inaccurate and inconsistent file disclosures. The FCRA violations suffered by Plaintiff are typical of those suffered by other class members, and Defendant treated Plaintiff consistently with other class members in accordance with its standard policies and practices.

52. <u>Adequacy:</u> Plaintiff will fairly and adequately protect the interests of

the classes because he and his experienced counsel are free of any conflicts of interest and are prepared to vigorously litigate this action on behalf of the classes.

53. <u>Commonality</u>: This case presents common questions of law and fact, including but not limited to:

- a. Whether Defendant violated the FCRA by failing to follow reasonable procedures to ensure maximum possible accuracy in reporting criminal convictions based on a name-only match;
- b. Whether Defendant violated the FCRA by inaccurately disclosing the sources of its information;
- c. Whether Defendant's violations of the FCRA were willful; and
- d. The proper measure of damages.

54. Class certification is appropriate under Fed. R. Civ. P. 23(b)(3) because, *inter alia*, questions of law and fact common to the classes predominate over any questions affecting only individual members of the classes, and because a class action is superior to other available methods for the fair and efficient adjudication of this litigation. Defendant's conduct described in this Complaint stems from common and uniform policies and practices, resulting in common violations of the FCRA. Members of the classes do not have an interest in pursuing separate actions against Defendant, as the amount of each class member's individual claim is small compared to the expense and burden of individual prosecution. Class certification also will obviate the need for unduly duplicative litigation that might result in inconsistent judgments concerning Defendant's practices. Moreover, management of this action as a class action will not present any likely difficulties. In the interests of justice and judicial efficiency, it would be desirable to concentrate the litigation of all class members' claims in a single forum.

55. In view of the complexities of the issues and the expenses of litigation, the separate claims of individual class members are insufficient in amount to support separate actions.

56. Yet, the amount which may be recovered by individual class members will be large enough in relation to the expense and effort of administering the action to justify a class action. The administration of this action can be handled by class counsel or a third-party administrator, and the costs of administration will represent only a small fraction of the ultimate recovery to be achieved.

57. Plaintiff intends to send notice to all members of the classes to the extent required by Rule 23(c)(2). The names and addresses of the class members are available from Defendant's records.

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COUNT I 15 U.S.C. § 1681e(b) On behalf of Plaintiff and the Inaccurate Matching Class

58. Plaintiff reiterates each of the allegations in the preceding paragraphs as if set forth at length herein.

59. Defendant violated 15 U.S.C. § 1681e(b) by failing to establish or to follow reasonable procedures to assure maximum possible accuracy in the preparation of the consumer reports it furnished regarding Plaintiff and the Inaccurate Matching Class members. Specifically, Defendant misidentified Plaintiff as a convicted sex offender based on a name-only match, without attempting to identify other data points, or consulting easily accessible online information, or questioning why Plaintiff was not on the sex offender registry.

60. The foregoing violations were negligent and/or willful. Defendant acted in knowing or reckless disregard of its obligations and the rights of Plaintiff and other Inaccurate Matching Class members under 15 U.S.C. § 1681e(b).

61. As a result of Defendant's conduct, Plaintiff and Inaccurate Matching Class members suffered actual damages including but not limited to: denial of rental opportunities, damage to reputation, embarrassment, humiliation and other mental and emotional distress.

62. Plaintiff and Inaccurate Matching Class members are entitled to recover

actual damages and/or statutory damages, punitive damages, costs and attorneys' fees from Defendant in an amount to be determined by the Court pursuant to 15 U.S.C. §§ 1681n and 1681o.

<u>COUNT II</u> 15 U.S.C. § 1681g On behalf of Plaintiff and the §1681g Class

63. Plaintiff reiterates each of the allegations in the preceding paragraphs as if set forth at length herein.

64. Defendant violated 15 U.S.C. § 1681g by including contradictory information it its disclosures regarding the source of the criminal records it reported.

65. The foregoing violations were negligent and/or willful. Defendant acted in knowing or reckless disregard of its obligations and the rights of Plaintiff and other §1681g Class members under 15 U.S.C. § 1681g.

66. As a result of Defendant's conduct, Plaintiff and §1681g Class members suffered damages including but not limited to: denial of information and denial of the opportunity to correct inaccurate information.

67. Plaintiff and §1681g Class members are entitled to recover actual damages and/or statutory damages, punitive damages, costs and attorneys' fees from Defendant in an amount to be determined by the Court pursuant to 15 U.S.C. §§ 1681n and 1681o.

JURY TRIAL DEMANDED

Plaintiff demands a jury trial as to all claims so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, on behalf of himself and the classes, seek the following relief:

- a. Determining that this action may proceed as a class action under Rule 23;
- b. Designating Plaintiff as the class representative for the classes;
- c. Designating Plaintiff's counsel as counsel for the classes;
- d. Issuing proper notice to the classes at Defendant's expense;
- e. Declaring that Defendant committed multiple, separate violations of the FCRA;
- f. Declaring that Defendant acted negligently, or willfully and in deliberate or reckless disregard of the rights of Plaintiff and the classes under the FCRA;
- g. Awarding actual and/or statutory damages as provided by the FCRA;
- h. Awarding punitive damages;
- i. Awarding reasonable attorneys' fees and costs and expenses, as

provided by the FCRA;

j. Granting other and further relief, in law or equity, as this Court may deem appropriate and just.

Date: November 7, 2018

Respectfully submitted,

/s/E. Michelle Drake E. Michelle Drake (Bar No. 229202) BERGER MONTAGUE PC 43 SE Main Street, Suite 505 Minneapolis, MN 55414 Tel. 612.594.5999 Fax. 612.584.4470 Email: emdrake@bm.net

Counsel for Plaintiff

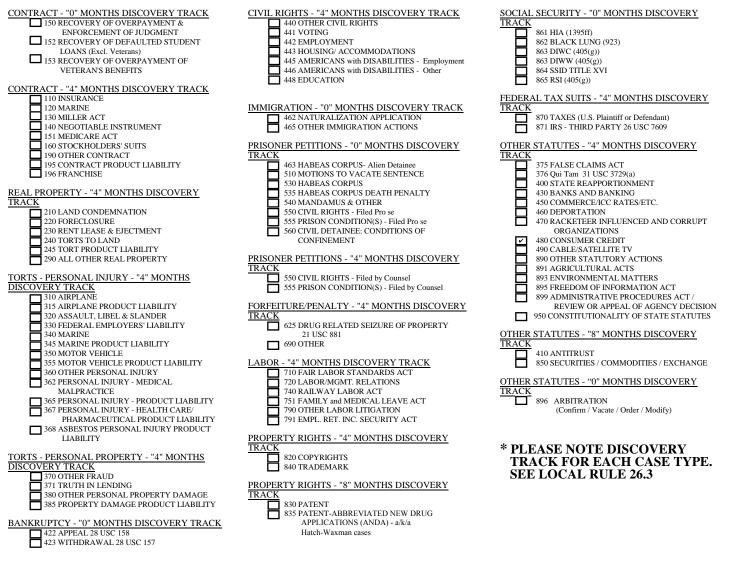
JS44 (Rev. 6/2017 NDGA) SALE 1:18-CV-05141-CAP-APTIL DOWERS SHEET iled 11/07/18 Page 1 of 2

The JS44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form is required for the use of the Clerk of Court for the purpose of initiating the civil docket record. (SEE INSTRUCTIONS ATTACHED)

I. (a) PLAINTIFF(S) William R. Hall, Jr., individually and as a represer	atativo of the	DEFENDANT(S)
classes		TransUnion Rental Screening Solutions, Inc.
(b) COUNTY OF RESIDENCE OF FIRST LISTED		COUNTY OF RESIDENCE OF FIRST LISTED
PLAINTIFF Cherokee (EXCEPT IN U.S. PLAINTIFF CASES)		DEFENDANT
		NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND
(c) ATTORNEYS (FIRM NAME, ADDRESS, TELEPHONE NUL E-MAIL ADDRESS)	MBER, AND	ATTORNEYS (IF KNOWN)
E. Michelle Drake, Berger Montague PC, 43	SE Main	
Street, Suite 505, Minneapolis, MN 55414;		
612-594-5933; emdrake@bm.net		
II. BASIS OF JURISDICTION	III. CITIZ	ZENSHIP OF PRINCIPAL PARTIES
(PLACE AN "X" IN ONE BOX ONLY)	(PLACE A	N "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) (FOR DIVERSITY CASES ONLY)
	PLF DEF	PLF DEF
1 U.S. GOVERNMENT PLAINTIFF U.S. GOVERNMENT NOT A PARTY)		TIZEN OF THIS STATE 4 INCORPORATED OR PRINCIPAL PLACE OF BUSINESS IN THIS STATE
2 U.S. GOVERNMENT DEFENDANT INDICATE CITIZENSHIP OF PARTIES	\square_2 \square_2 cr	FIZEN OF ANOTHER STATE 5 5 INCORPORATED AND PRINCIPAL PLACE OF BUSINESS IN ANOTHER STATE
IN ITEM III)		FIZEN OR SUBJECT OF A \Box_6 \Box_6 FOREIGN NATION
	FO	REIGN COUNTRY
IV. ORIGIN Place an "X "IN ONE BOX ONLY)I original PROCEEDING 2 removed from STATE COURT 3 remanded from APPELLATE COURT	4 REINSTATED REOPENED	DR 5 ANOTHER DISTRICT (Specify District) MULTIDISTRICT 7 FROM MAGISTRATE JUDGE TRANSFER JUDGMENT
MULTIDISTRICT 8 LITIGATION - DIRECT FILE		
V. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE JURISDICTIONAL STATUTES UN	UNDER WHICH YOU	ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE - DO NOT CITE
Violations of the Fair Credit Reporting Act, 15		
		, 1.
(IF COMPLEX, CHECK REASON BELOW)		
☑ 1. Unusually large number of parties.	6. Prob	lems locating or preserving evidence
✓ 2. Unusually large number of claims or defenses.	7. Pend	ing parallel investigations or actions by government.
3. Factual issues are exceptionally complex	🖌 8. Mult	iple use of experts.
2 4. Greater than normal volume of evidence.	9. Nee	d for discovery outside United States boundaries.
5 . Extended discovery period is needed.	0. Exist	ence of highly technical issues and proof.
FOR OFFICE USE ONLY	ON LINUED (ON REVERSE
RECEIPT # AMOUNT \$		G IFP MAG. JUDGE (IFP)
JUDGE MAG. JUDGE(Referral)	NATURE	DF SUIT CAUSE OF ACTION

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VI. NATURE OF SUIT (PLACE AN "X" IN ONE BOX ONLY)



VII. REQUESTED IN COMPLAINT:

└ CHECK IF CLASS ACTION UNDER F.R.Civ.P. 23 DEMAND \$______ JURY DEMAND └ YES □ NO (CHECK YES <u>ONLY</u> IF DEMANDED IN COMPLAINT)

VIII. RELATED/REFILED CASE(S) IF ANY

JUDGE_

DOCKET NO._

CIVIL CASES ARE DEEMED RELATED IF THE PENDING CASE INVOLVES: (CHECK APPROPRIATE BOX)

- □ 1. PROPERTY INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- □ 2. SAME ISSUE OF FACT OR ARISES OUT OF THE SAME EVENT OR TRANSACTION INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 3. VALIDITY OR INFRINGEMENT OF THE SAME PATENT, COPYRIGHT OR TRADEMARK INCLUDED IN AN EARLIER NUMBERED PENDING SUIT.
- 4. APPEALS ARISING OUT OF THE SAME BANKRUPTCY CASE AND ANY CASE RELATED THERETO WHICH HAVE BEEN DECIDED BY THE SAME BANKRUPTCY JUDGE,
- ☐ 5. REPETITIVE CASES FILED BY <u>PRO SE</u> LITIGANTS.
- 6. COMPANION OR RELATED CASE TO CASE(S) BEING SIMULTANEOUSLY FILED (INCLUDE ABBREVIATED STYLE OF OTHER CASE(S)):

☐ 7. EITHER SAME OR ALL OF THE PARTIES AND ISSUES IN THIS CASE WERE PREVIOUSLY INVOLVED IN CASE NO. DISMISSED. This case ☐ IS ☐ IS NOT (check one box) SUBSTANTIALLY THE SAME CASE.

, WHICH WAS

/s/E. Michelle Drake

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EXHIBIT A

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TransUnion.

TransUnion Rental Screening Solutions PO Box 800 Woodlyn, PA 19094

P8TCR600100001

William Hall

08/22/2018

Dear: William Hall

Your request for a copy of your consumer report was received on 08/20/2018. We have completed processing the details of your request.

Enclosed is a copy of your consumer report as processed by TransUnion Rental Screening Solutions, LLC, a subsidiary of TransUnion, on 01/05/2017 and 07/06/2018. Details indicating the recipients of your consumer report are also enclosed.

We have also queried our criminal report and civil records database and enclosed these results as of the date of this letter. Keep in mind that changes in the criminal or civil database may have occurred between the date when any original consumer report(s) were generated and the date of this letter. This additional information will reflect any changes that have occurred, if any.

Please note that since TransUnion Rental Screening Solutions, LLC does not retain continuous access to consumer credit reports, any reports provided in this response reflect only what is retained by TransUnion Rental Screening Solutions, LLC as of the date of this letter. In order to receive a current, up-to-date copy of your consumer credit report you must request a free copy of this report directly from the credit bureau(s). The contact information for all three bureaus (Experian, Equifax, and TransUnion) is listed below:

Equifax: 1-800-685-1111 Experian: 1-888-397-3742 TransUnion: 1-800-888-4213

All data provided by hereunder is intended solely for the customer who initially receives such data directly from TransUnion Rental Screening Solutions, Inc. and/or one of its subsidiaries or affiliates (collectively "TURSS"). TURSS DOES NOT GUARANTY OR WARRANT THE ACCURACY, CORRECTNESS, OR COMPLETENESS OF THE DATA. TURSS DELIVERS ALL DATA TO CUSTOMERS ON AN "AS IS" "AS AVAILABLE" BASIS WITHOUT ANY EXPRESS OR IMPLIED WARRANTY, GUARANTY, OR REPRESENTATION OF ANY KIND CONCERNING THE DATA ITSELF, ITS MERCHANTABILITY, OR ITS FITNESS FOR A PARTICULAR PURPOSE OR FUNCTION. TURSS SHALL NOT BE LIABLE IN ANY MANNER FOR ANY CLAIMS, LOSSES, EXPENSES OR DAMAGES OF WHATEVER KIND THAT MAY ARISE OUT OF OR RESULT FROM A CUSTOMER'S RELIANCE ON (OR USE OF) THE DATA PROVIDED BY TURSS, EVEN IF TURSS HAS BEEN ALERTED TO THE POSSIBILITY OF SUCH CLAIMS, LOSSES, EXPENSES OR DAMAGES. BY ACCESSING ANY SUCH DATA, THE CUSTOMER ACKNOWLEDGES AND AGREES THAT THE CUSTOMER HAS NOT RELIED ON ANYTHING THAT MAY BE INCONSISTENT WITH THIS LEGAL STATEMENT.

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TransUnion Rental Screening Solutions PO Box 800 Woodlyn, PA 19094

Alternatively, you may also obtain a free copy of your consumer credit report from all three bureaus by accessing <u>www.annualcreditreport.com</u>.

If you find that any information contained in the consumer report(s) enclosed is inaccurate or incomplete, you have the right to dispute the matter by contacting Customer Support at 1-800-230-9376 or <u>TURSSDispute@transunion.com</u>.

Sincerely,

Consumer Relations TransUnion Rental Screening Solutions, LLC

All data provided by hereunder is intended solely for the customer who initially receives such data directly from TransUnion Rental Screening Solutions, Inc. and/or one of its subsidiaries or affiliates (collectively "TURSS"). TURSS DOES NOT GUARANTY OR WARRANT THE ACCURACY, CORRECTNESS, OR COMPLETENESS OF THE DATA. TURSS DELIVERS ALL DATA TO CUSTOMERS ON AN "AS IS" "AS AVAILABLE" BASIS WITHOUT ANY EXPRESS OR IMPLIED WARRANTY, GUARANTY, OR REPRESENTATION OF ANY KIND CONCERNING THE DATA ITSELF, ITS MERCHANTABILITY, OR ITS FITNESS FOR A PARTICULAR PURPOSE OR FUNCTION. TURSS SHALL NOT BE LIABLE IN ANY MANNER FOR ANY CLAIMS, LOSSES, EXPENSES OR DAMAGES OF WHATEVER KIND THAT MAY ARISE OUT OF OR RESULT FROM A CUSTOMER'S RELIANCE ON (OR USE OF) THE DATA PROVIDED BY TURSS, EVEN IF TURSS HAS BEEN ALERTED TO THE POSSIBILITY OF SUCH CLAIMS, LOSSES, EXPENSES OR DAMAGES. BY ACCESSING ANY SUCH DATA, THE CUSTOMER ACKNOWLEDGES AND AGREES THAT THE CUSTOMER HAS NOT RELIED ON ANYTHING THAT MAY BE INCONSISTENT WITH THIS LEGAL STATEMENT.

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TransUnion Rental Screening Solutions PO Box 800 Woodlyn, PA 19094

Consumer Reports on File

The following documents are the contents of a consumer report generated on 01/05/2017 for RentGrow and on 07/06/2018 for Gabriel Calderon.



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Application #1000004616261

Applicant	Recommendation	Open Bankrupicy	Credit Score	Applicant Role	Status	Reports	Regenerate Del?
	Accept				Completed		Credil
Villiam Hall (XXX-XX-				Primary Renter	(07-06-18 03:42 PM)		Criminal
							Eviction
riminal Records by s	state William R	Hall DOB	1968 SSN X	xx-xx-	CANTON Geor	gia	
ummary: 1 Records f	Found in 1 States						
ummary: 1 Records F	Found in 1 States						
ummary: 1 Records F	^z ound in 1 States						
- - -	Found in 1 States	First Name	Middle Name	Lasi Na	inte DOB	SSN	Dataset
- - -		First Name WILLIAM	Middle Name R.	Lasi Na 	me DOS	SSN No SSN Returned	Dataset
- - -	Record				me DOB		
- - -	Record				me DOB		
- - -	Record				me DOB		SCC02
iouth Carolina (1)	Record				me DOB		SCC02
iouth Carolina (1) Notion Report	Record				me DOB		SCC02

State Report

State

AK, AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, HI, IA, ID, IL, IN, KS, KY, [#] of Records LA, MA, MO, ME, MI, MA, MO, MS, MT, NC, NO, NE, NH, NJ, NM, NV, NY, OH, OK, OR, PA, PR, RI, SC, SD, TN, TX, UT, VA, VI, VT, WA, VA, WV, WY

0

No Records Found

Action/Report

No Records Found

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Applicant Information Submitted

Name: William R Hall



7/11/2018 6:36 PM

WILLIAM R. HALL



SC Dept of Corrections Dataset: DOB: N/A Age: N/A SSN: N/A Residence: N/A Aliases No aliases found

Physical Features

PHYSICAL DETAILS



Weight: 150 lb Eye Color: Haz Complexion: Olive

PERSON PHYSICAL FEATURES

Booking(s):

0

Sentencing(s):

0

No physical features listed

Summary

Incident(s):

()

Court Action(s):

1

Comments

Court Action

Court Charge Charge Sequence Id: 1 Charge Description: CRIM SEX COND W/MINOR(1ST

CHARGE DISPOSITION

Arrest(s): 0

Supervision(s):

0

\$ Income Insights Report

8/22/2018

(i) TransUnion's Income Estimate



We estimate William's income may be **\$5,000 or more lower** than what they reported*. Consider verifying the applicant's income.

*Applicant)Self Reported Income:

 \odot

Estimated Income to Rent

We estimate William's household income may be at least **3X the annual rent**.

Have Questions?

Read more about this report in our FAQs

Income Insights is based on a predictive estimate of a consumer's total income and is intended to help flag applicants who require additional documentation, such as a pay stub. Adverse action based on this estimate is not permitted.

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E Credit	Report		8/22/2018 10:18 AM	
Applicant Information Sub Name: Willia Address:	omitted am R Hall TON, GA		SSN Message: SSN Match (confirmed b bureau)	y
William F	R Hall Jr		ader andersamhende verden Verseur I – 201 – 201 – 201 – Prozens um de definition de Blandfers	
AKA William Russell Hali				
Addresses				
Current Address Anderson SC Reported: 08/12	Current Address Canton GA Reported: 10/11	Current Address Anderson SC		

Employment

Mike Bell Chevrolet

Carolina For Honea Path, SC

Consumer Statements

Type Regular consumer statement Explanation Do not confuse with consumers of similar identification; verify all identifying information.

Profile Summary

Record Counts

Tradelines:

37

0



0

0

Public Records:

U

Collections:

Derogatory Items

Negative Tradelines:

Tradelines with any historical negatives: Occurrence of any historical negatives:

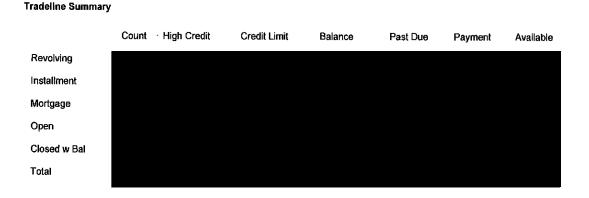
Inquiries:

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10

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ResidentScore



Score Factors

Too many inquiries Average balance of auto accounts is too high Recency of a balance overlimit on a bankcard account

Tradelines

Tradelines Total

Count	Balance Total	Total Credit Limit	Total Past Due

Trades



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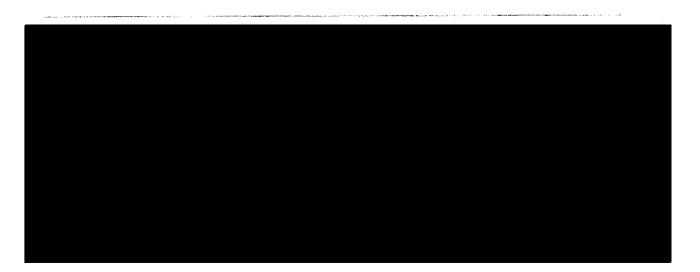
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,Payment History



Payment History

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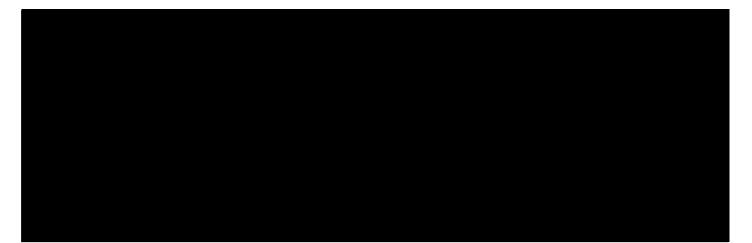
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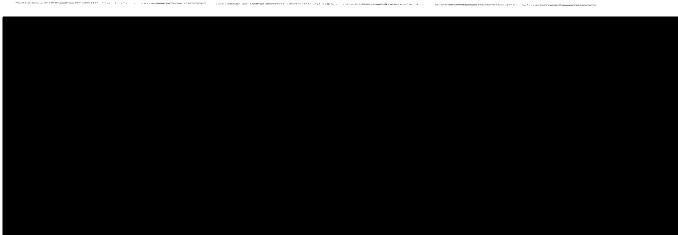
Payment History												
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2016	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar 🏈	Feb	Jan
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Late Payment Summar	¥											

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Paym	ent Histo	ory						·							
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Payment History												
2018	May	Apr	Mar	Feb	Jan 🛞							
2017	Dec	Nov	Oct	Sep	Aug	Jui	Jun	May	Apr	Mar	Feb	Jan
2016	Dec	Nov	Oct	Sep	Aug	Jul 🛞	Jun	May	Apr	Mar 🚱	Feb	Jan
2015	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar 🚱	Feb	Jan .
2014	Dec	Nov	Oct	Sep	Aug	Jul	Jun					
Late Payment Summar (48 Months)	ý											

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Payment History												
2018	May	Арг 🕐	Mar 🕐	Feb	Jan							
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2016	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar 🛞	Feb	Jan
2015	Dec	Nov	Oct	Sep	Aug	Jul 🕐	Jun	May	Арг 🕐	Mar	Feb	Jan
2014	Dec	Nov	Oct	Sep 🖗								
Late Payment Summar (45 Months) 0 0 0	y O											

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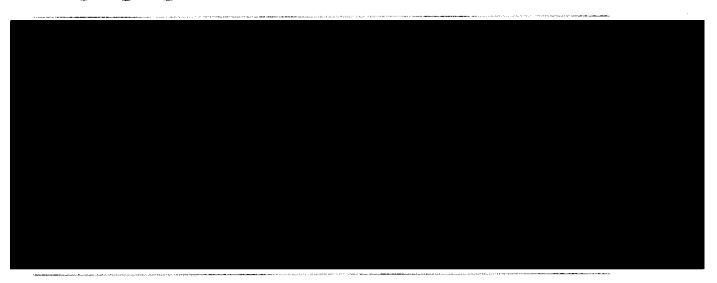
Payment History

2018	May 🔇	Apr	Mar 🏈	Feb	Jan							
2017	Dec	Nov	Oct	Sep	Aug	Jui	Jun	May	Apr	Mar 🏈	Feb	Jan
2016	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar 🌘	Feb	Jan
2015	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan
2014	Dec	Nov	Oct	Sep								

Late Payment Summary (45 Months) 0 0 0

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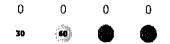


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Payment History



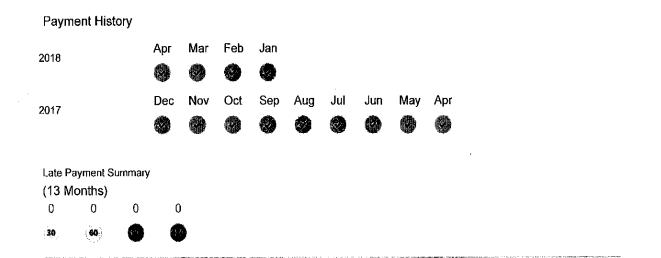
Late Payment Summary (1 Month)







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Payment History

2018	Mar	Feb	Jan						·			
2017	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar 🛞	Feb	Jan
2016	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan Ø
2015	Dec	Nov	Oct	Sep	Aug							

Late Payment Summary (32 Months) 0 0 0 0 0

(60)

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Payment History	
2018	Mar
2010	(9)

Late Payment Summary

(1 Mo	onth)		
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Payment History

2018			Feb	Jan											
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Payment History												
2018	Jan											
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Late Payment Summary									
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Paym	ent Hist	ory											
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Payment History

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2015	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Арг	Маг	Feb	Jan
2013		0	0	0	0	9	0	•	0	0	0	8
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2014	9		٩		0	0	Ø	4	0	Ø	@	•
2013	Dec	Nov	Oct	Sep	Aug							
2013	0	0	0	3	0							

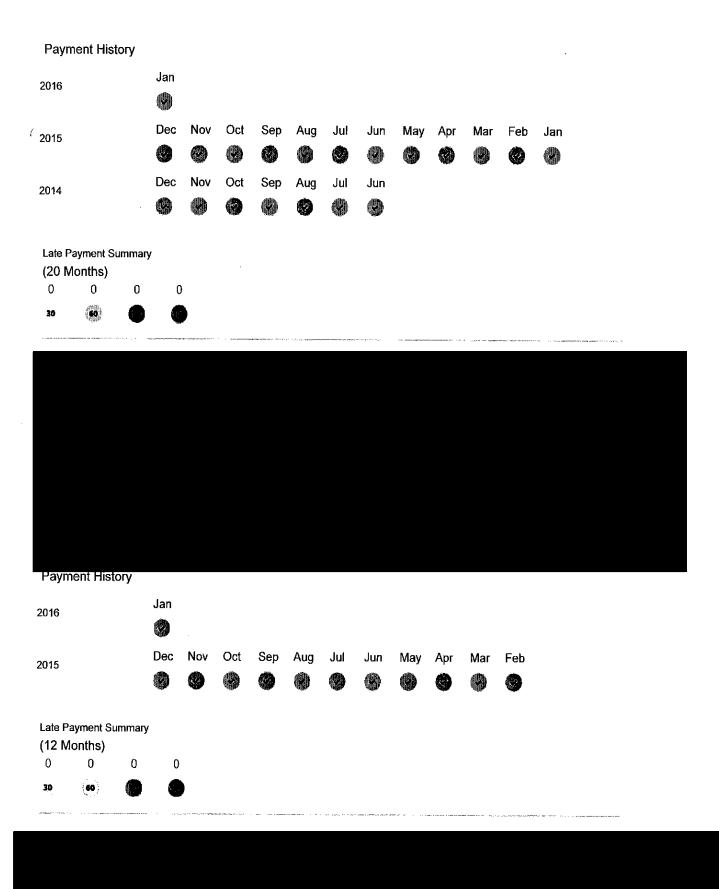
Late Payment Summary	
(31 Months)	

0	0	0	0
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2015	Mar 🚷	Feb	Jan					
2014	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May
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Dec Nov Oct Sep Aug Jul Jun May Apr Mar Feb Jan	
2013 Dec Nov Oct Sep Aug Jul Jun May Apr Mar Feb Jan	
2012 Dec Nov Oct Sep Aug Jul Jun May Apr Mar Feb Jan	
2011 Dec Nov	
Late Payment Summary (39 Months) 0 0 0 0	

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Payment History												
2014	Мау	Арг	Mar	Feb	Jan							
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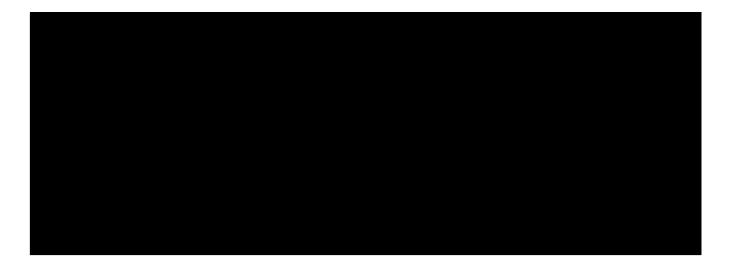
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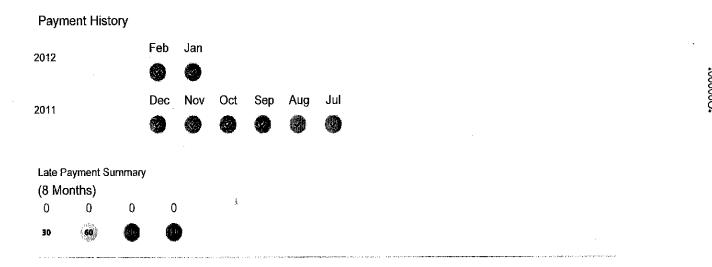
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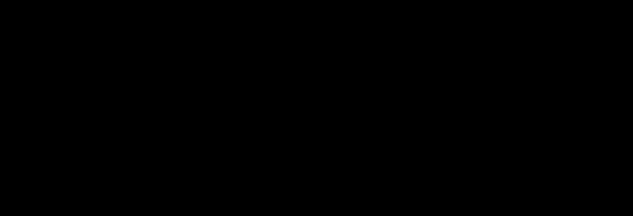


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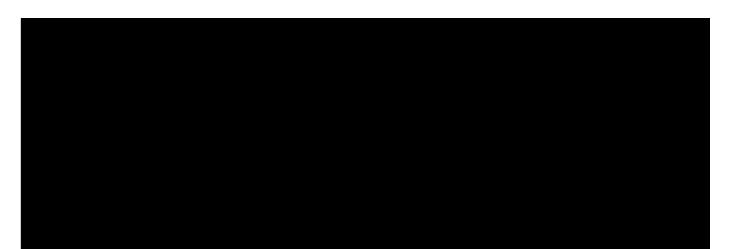
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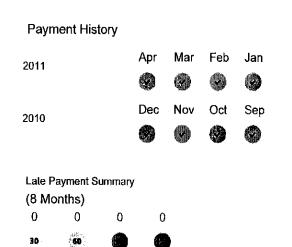




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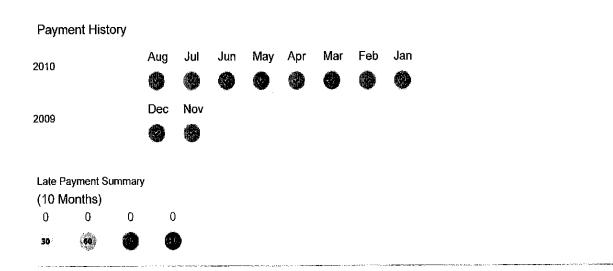
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Payment History

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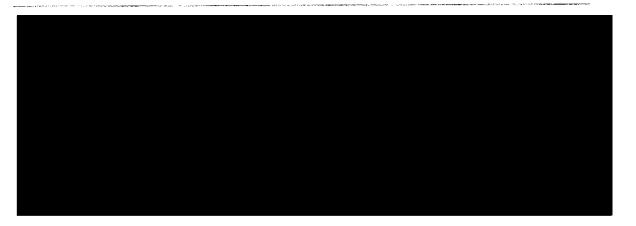




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Inquiries



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TransUnion. Background Data Solutions

Application Summary

<u>Willi</u>am Hall /1968

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12.

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Application #: Created On:

B24488208D5BC 1/5/2017 5:43:54 PM

Eviction Search Instant

State South Carolina, Georgia, Pennsylvania, Maryland

of Records Action/ Status

0

0 Records Found

P8TCR600100001

017/021

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Application Summary

William Hall 1968

Application #: Created On:

B399194621837 8/22/2018 10:46:06 AM

Most Wanted			
Search	State	# of Records	Action/ Status
Instant	Most Wanted List	0	0 Records Found
Sex Offender			
Search	State	# of Records	Action/ Status
Inslant	National Sex Offender	0	0 Records Found
Federal			
Search	State	# of Records	Action/ Status
Instant	Potential OFAC Match	0	0 Records Found
Criminal			
Search	State	# of Records	Action/ Status
Instant	Illinois, Indiana, Michigan, Ohio, Iowa, Kansas, Minnesota, Missouri, Nebraska, North Dakota, Wisconsin, New Jersey, New York, Pennsylvania, Connecticut, Maine, New Hampshire, Rhode Island, Vermont, Alabama, Mississippi, Tennessee, District of Columbia, Florida, Georgia, Kentucky, Maryland, North Carolina, South Carolina, Virginia, Arkansas, Louisiana, Oklahoma, Texas, Arizona, Colorado, Idaho, Montana, Nevada, New Mexico, Utah, Alaska, California, Hawaii, Oregon, Washington, West Virginia		0 Records Found
Eviction			
Search	State	# of Records	Action/ Status
	Alabama, Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Utah, Vermont, Virgin Islands, Virginia, Washington, West Virginia, Wisconsin, Wyoming		0 Records Found



CONSUMER REPORT IN UIRIES WITH TRANSUNION RENTAL SCREENING SOLUTIONS

The following inquiries were made against your consumer report(s) over the past two years:

Company 2 ame: RentGrow Date of Inquiry: 1/5/2017 Company Phone 2 umber: (800) 736-8476 Company Address: 307 Waverley Oaks Road Suite 301 Waltham, MA 02452 Type of Business: Tenant Screening

Company 2 ame: Gabriel Calderon Date of Inquiry: 1/6/2018 Company Phone 2 umber: (805) 701-5743 Company Address: 79 Tahoe Drive, 2 ewnan, GA 30263 Type of Business: Tenant Screening

All data provided by hereunder is intended solely for the customer who initially receives such data directly from TransUnion Rental Screening Solutions, Inc. and/or one of its subsidiaries or affiliates (collectively "TURSS"). TURSS DOES NOT GUARANTY OR WARRANT THE ACCURACY, CORRECTNESS, OR COMPLETENESS OF THE DATA. TURSS DELIVERS ALL DATA TO CUSTOMERS ON AN "AS IS" "AS AVAILABLE" BASIS WITHOUT ANY EXPRESS OR IMPLIED WARRANTY, GUARANTY, OR REPRESENTATION OF ANY KIND CONCERNING THE DATA ITSELF, ITS MERCHANTABILITY, OR ITS FITNESS FOR A PARTICULAR PURPOSE OR FUNCTION. TURSS SHALL NOT BE LIABLE IN ANY MANNER FOR ANY CLAIMS, LOSSES, EXPENSES OR DAMAGES OF WHATEVER KIND THAT MAY ARISE OUT OF OR RESULT FROM A CUSTOMER'S RELIANCE ON (OR USE OF) THE DATA PROVIDED BY TURSS, EVEN IF TURSS HAS BEEN ALERTED TO THE POSSIBILITY OF SUCH CLAIMS, LOSSES, EXPENSES OR DAMAGES. BY ACCESSING ANY SUCH DATA, THE CUSTOMER ACKNOWLEDGES AND AGREES THAT THE CUSTOMER HAS NOT RELIED ON ANYTHING THAT MAY BE INCONSISTENT WITH THIS LEGAL STATEMENT.

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Thank you.

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TransUnion.

TransUnion Rental Screening Solutions Attn: Disputes PO Box 800 Woodlyn, PA 19094

TURSS Sources of Data

The information TransUnion Rental Screening Solutions (TURSS) has on file related to you and / or included in your current and/or historical consumer report(s) generated on 07/06/2018 was collected from public record sources by TransUnion Rental Screening Solutions or a company TURSS hired to collect such information. If you submit a dispute of the accuracy of a public record item, TransUnion Rental Screening Solutions may update the item based on the information you provide, or we may investigate your dispute by checking with the public record source or by asking our vendor to verify that the current status of the public record is reported accurately.

The public record sources used to generate the report(s) are as follows:

South Carolina, Aiken County

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Thank you.

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Para in 20552.	Para informacion en espanol, visite <u>www.consumerfinance.govlearunore</u> o escribe a la Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.
	A Summary of Your Rights Under the Fair Credit Reporting Act
The fec types o records go to <u>w</u>	The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under the FCRA. For more information, including information about additional rights, go to <u>www.consumerfinance.gov/learnmore.</u> or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.
•	You must be told if information in your file has been used against you. Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment or to take another adverse action against you must tell you, and must give you the name, address, and phone number of the agency that provided the information.
•	You have the right to know what is in your file. You may request and obtain all the information about you in the files of a consumer reporting agency (your "file disclosure"). You will be required to provide proper identification, which may include your Social Security Number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:
	 a person has taken adverse action against you because of information in your credit report; you are the victim of identity theft and place a fraud alert in your file; your file contains inaccurate information as a result of fraud; you are on public assistance; you are unemployed but expect to apply for employment within 60 days.
	In addition, all consumers are entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty consumer reporting agencies. See <u>www.consumerfinance.gov/learnmore</u> for additional information.
•	You have the right to ask for a credit score. Credit scores are numerical summaries of your credit-worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create scores or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.
•	You have the right to dispute incomplete or inaccurate information. If you identify information in your file that is incomplete or inaccurate, and report it to the consumer reporting agency, the agency must investigate unless your dispute is frivolous. See <u>www.consumerfnance.gov/leanmore</u> for an explanation of dispute procedures.
•	Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information. Inaccurate, incomplete, or unverifiable information must be removed or corrected, usually within 30 days. However a consumer reporting agency may continue to report information it has verified as accurate.
•	Consumer reporting agencies may not report outdated negative information. In most cases, a consumer reporting agency may not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.
•	Access to your file is limited. A consumer reporting agency may provide information about you only to people with a valid need - usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifies those with a valid need for access.

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- employer, or a potential employer, without your written consent given to the employer. Written consent generally is not required in the trucking industry You must give your consent for reports to be provided to employers. A consumer reporting agency may not give out information about you to your For more information, go to www.consumerfinance.gov/leanmore.
- credit and insurance must include a toll-free phone number you can call if you choose to remove your name and address from the lists these offers are based You may limit "prescreened" offers of credit and insurance you get based on information in your credit report. Unsolicited "prescreened" offers for on. You may opt-out with the nationwide credit bureaus at 1-888-567-8688 (888-50PTOUT).
- You may seek damages from violators. If a consumer reporting agency, or, in some cases, a user of consumer reports or a furnisher of information to a consumer reporting agency violates the FCRA, you may be able to sue in state or federal court.
- Identity theft victims and active duty military personnel have additional rights. For more information, visit www.consumerfinance.gov/leanmore.

States may enforce the FCRA, and many states have their own consumer reporting laws. In some cases, you may have more rights under state law. For more information, contact your state or local consumer protection agency or your state Attorney General. For information about your federal rights, contact:

TYPE OF BUSINESS:	CONTACT:
1.a. Banks, savings associations, and credit unions with total assets of over \$10 billion and their affiliates	Bureau of Consumer Financial Protection 1700 G Street NW Washington, DC 20552
b. Such affiliates that are not banks, savings associations, or credit unions also should list, in addition to the CFPB:	Federal Trade Commission Consumer Response Center - FCRA Washington, DC 20580 1-877-382-4357
2. To the extent not included in item 1 above:	Office of the Comptroller of the Currency
a. National banks, federal savings associations, and federal branches and federal agencies of foreign banks	Customer Assistance Group 1301 McKinney Street, Suite 3450 Houston, TX 77010-9050
b. State member banks, branches and agencies of foreign banks (other than federal branches, federal agencies, and insured state branches of foreign banks), commercial lending companies owned or controlled by foreign banks, and organizations operating under section 25 or 25A of the Federal Reserve Act	Federal Reserve Consumer Help PO Box 1200 Minneapolis, MN 55480
c. Nonmember Insured Banks, Insured State Branches of Foreign Banks, and Insured state savings associations	FDIC Consumer Response Center 1100 Walnut Street, Box #11 Kansas City, MO 64106
d. Federal Credit Unions	National Credit Union Administration Office of Consumer Protection (OCP) Division of Consumer Compliance and Outreach (DCCO)

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	1775 Duke Street Alexandria, VA 22314
3. Air carriers	Asst. General Counsel for Aviation Enforcement & Proceedings Aviation Consumer Protection Division Department of Transportation 1200 New Jersey Avenue, S.E. Washington, DC 20590 1200 Xevenue, S.E.
4. Creditors Subject to Surface Transportation Board	Office of Proceedings, Surface Transportation Board Department of Transportation 395 E Street, S.W. Washington, DC 20423
5. Creditors subject to Packers and Stockyards Act, 1921 s	Nearest Packers and Stockyards Administration area supervisor
6. Small Business Investment Companies	Associate Deputy Administrator for Capital Access United States Small Business Administration 409 Third Street, SW, 8th Floor Washington, DC 20416
7. Brokers and Dealers	Securities and Exchange Commission 100 F Street, N.E. Washington, DC 20549
8. Federal Land Banks, Federal Land Bank Associations, Federal Intermediate Credit Banks, and Production I Credit Associations	Farm Credit Administration 1501 Farm Credit Drive McLean, VA 22102-5090
9. Retailers, Finance Companies, and All Other Creditors Not Listed Above	FTC Regional Office for region in which the creditor operates or Federal Trade Commission: Consumer Response Center- FCRA Washington, DC 20580 1-877-382-4357

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SUMMARY OF RIGHTS UNDER THE FCRA OF VICTIMS OF IDENTITY THEFT	Para informacion en espanol, visite <u>www.consumerfinance.gov</u> o escribe a la Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552. Remedving the Effects of Identity Theft	You are receiving this information because you have notified a consumer reporting agency that you believe that you are a victim of identity theft. Identity theft occurs when someone uses your name. Social Security Number, date of birth, or other identifying information, without authority, to commit fraud. For example, someone may have committed identity theft by using your personal information to open a credit card account or get a loan in your name. For more information, visit www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.	The Fair Credit Reporting Act (FCRA) gives you specific rights when you are, or believe that you are, the victim of identity theft. Here is a brief summary of the rights designed to help you recover from identity theft.	1. You have the right to ask the nationwide consumer reporting agencies place "fraud alerts" in your file to let potential creditors and others know that you may be a victim of identity theft. A fraud alert can make it more difficult for someone to get credit in your name because it tells creditors to follow certain procedures to protect you. It also may delay your ability to obtain credit. You may place a fraud alert in your file by calling just one of the three nationwide consumer reporting agencies. As soon as that agency processes your fraud alert, it will notify the other two, which then also must place fraud alerts in your file.	 Equifax: 1-800-525-6285; www.equifax.com Experian: 1-888-397-3742; www.experian.com TransUnion: 1-800-680-7289; www.transunion.com 	An <u>initial fraud alert</u> stays in your file for at least 90 days. An <u>extended alert</u> stays in your file for seven years. To place either of these alerts, a consumer reporting agency will require you to provide appropriate proof of your identity, which may include your Social Security Number. If you ask for an <u>extended alert</u> , you will have to provide an <u>identity theft report</u> . An <u>identity theft report</u> includes a copy of a report you have filed with a federal, state, or local law enforcement agency, and additional information a consumer reporting agency may require you to submit. For more detailed information about the <u>identity theft report</u> includes a copy of a report you have filed with a federal, state, or local law enforcement agency, and additional information a consumer reporting agency may require you to submit. For more detailed information about the <u>identity</u> theft report.	2. You have the right to free copies of the information in your file (your "file disclosure"). An <u>initial fraud alert</u> entitles you to a copy of all information in your file at each of the three nationwide agencies, and an <u>extended alert</u> entitles you to two free file disclosures in a 12-month period following the placing of the alert. These additional disclosures may help you detect signs of fraud, for example, whether fraudulent accounts have been opened in your name or whether someone has reported a change in your address. Once a year, you also have the right to a free copy of the information in your file at any consumer reporting agency, if you believe it has inaccurate information due to fraud, such as identity theft. You also have the ability to obtain additional free file disclosures under other provisions of the FCRA. See <u>www.consumerfunance.gov/learnmore</u> .	3. You have the right to obtain documents relating to fraudulent transactions made or accounts opened using your personal information. A creditor or other business must give you copies of applications and other business records relating to transactions and accounts that resulted from the theft of your identity, if you ask for them in writing. A business may ask you for proof of your identity, a police report, and an affidavit before giving you the documents. It also may specify an address for you to send your request. Under certain circumstances, a business can refuse to provide you with these documents. See <u>www.consumetfinance.gov/leanmore</u> .	

You have the right to obtain information from a debt collector. If you ask, a debt collector must provide you with certain information about the debt you believe was incurred in your name by an identity thief - like the name of the creditor and the amount of the debt. 4

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- Should you decide to ask a consumer reporting agency to block the reporting of this information, you must identify the information to block, and provide the If you believe information in your file results from identity theft, you have the right to ask that a consumer reporting agency block that information request for a block if, for example, you don't provide the necessary documentation, or where the block results from an error or a material misrepresentation of from your file. An identity thief may run up bills in your name and not pay them. Information about the unpaid bills may appear on your consumer report. consumer reporting agency with proof of your identity and a copy of your identity theft report. The consumer reporting agency can refuse or cancel your fact made by you. If the agency declines or rescinds the block, it must notify you. Once a debt resulting from identity theft has been blocked, a person or business with notice of the block may not sell, transfer, or place the debt for collection. เก่
- You also may prevent businesses from reporting information about you to consumer reporting agencies if you believe the information is a result of identity theft. To do so, you must send your request to the address specified by the business that reports the information to the consumer reporting agency. The business will expect you to identify what information you do not want reported and to provide an identity theft report. ن

To learn more about identity theft and how to deal with its consequences, visit www.consumerfinance.gov/learnmore. or write to the Consumer Financial Protection Bureau. You may have additional rights under state law. For more information, contact your local consumer protection agency or your state Attorney General In addition to the new rights and procedures to help consumers deal with the effects of identity theft, the FCRA has may other important consumer protections. They are described in more detail at www.consumerfinance.gov/leanmore.

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EXHIBIT B



Aiken County Second Judicial Circuit Public Index



Aiken County Home Page South Carolina Judicial Department Home Page SC.GOV Home Page

Switch View					
	The Sta	ate of South Ca	rolina VS Willian	n R Hall	
Case Number:	D705759	Court Agency:	General Sessions	Filed Date:	05/19/1993
Case Type:	Criminal-Clerk	Case Sub Type:			
Status:	Disposed	Assigned Judge:	Meek, Max Andrew Sr.	Disposition Judge:	Solicitor
Disposition:	Nolle Prosequi				
Disposition Date:	08/30/1994	Date Received:	05/19/1993	Arrest Date:	05/18/1993
Law Enf. Case:		True Bill Date:		No Bill Date:	
Prosecutor Case:		Indictment Number:	1994GS0200525	Waiver Date:	
Probation Case:					

Case Parties

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
A-1 081393 5CSE					Bond Entity		02/11/2009
Hall, William R	469 CAREY DR BEECH ISLAND SC 29841	White	м	1936	Defendant		02/11/2009

Charges

Name	Charge Code - Charge Description	Original Charge Code - Original Charge	Disposition Date
Hall, William R	with minors (no longer used)(see 0385,	0159-Sex / Criminal sexual conduct with minors (no longer used)(see 0385, 0396, 0397)	08/30/1994

Sentencina

And/Or	Description	Amount	Units	Begin Date	End Date	Completion Date	Consecutive or Concurrent
	DEF PLED TO RELATED CHARGE						

Bonds

			B	ond Info	rmation			
Bond Id	Set Date	Amend Date	Set By	Туре	Amount	Туре	Amount	Condition
D705759	05/19/1993			Surety Bond	\$25,000.00		\$0.00	
			F	Post Infor	rmation			
Bond Id	Bor	nd Type		Amount	Date Posted		F	Posted By
D705759	Surety	Bond	\$25	5,000.00 05/19/1993		A-1 081393 5CSE		E

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ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: <u>TransUnion Rental Screening Solutions Sued Over Allegedly Inaccurate Background Report</u>