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11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA

13 HENAN LOUIS JOOF, an individual, ) **Case No.:**  
14 AKOP SOGOMONYAN, an individual,) **CLASS ACTION ALLEGATION**  
15 individually and on behalf of similarly ) **COMPLAINT**  
situated California consumers; ) **1. Negligence**  
16 ) **2. Negligent Misrepresentation**  
Plaintiffs, ) **3. Willful Violation of FCRA**  
17 ) **4. Negligent Violation of FCRA**  
18 v. ) **5. Willful Violation of CCRAA**  
19 ) **6. Negligent Violation of CCRAA**  
EQUIFAX INC., a Georgia corporation;)   
20 )  
21 Defendant. )  
22 ) **JURY TRIAL DEMANDED**  
23 )  
24 )

25 Henan Louis Joof and Akop Sogomonyan (collectively "Plaintiffs"),  
26 individually and on behalf of a class of all similarly situated consumers in California  
27 ("Class") assert the following claims against Equifax Inc. ("Defendant") and in  
28 support thereof, state as follows:

**PARTIES**

1  
2 1. Plaintiffs are individual consumers who at all times relevant herein resided  
3 in the State of California, County of Los Angeles.

4 2. Defendant Equifax Inc. is a Georgia corporation, a consumer credit  
5 reporting agency who conducts business in United States.

**JURISDICTION AND VENUE**

6  
7 3. This Court has jurisdiction pursuant to 28 U.S.C. § 1332 because the Class  
8 consists of more than 100 members, the amount at issue is more than \$5 million  
9 exclusive of interest and costs; and minimal diversity exists because at list one  
10 Plaintiff is a citizen of a different state than Defendant.

11 4. Venue is proper under 28 U.S.C. § 1391 because a substantial number of  
12 California consumers whose credit and personal information is stored by Defendant  
13 live in the County of Los Angeles.

**STATEMENT OF FACTS**

14  
15 5. Defendant is a consumer credit reporting agency considered one of the  
16 three biggest credit reporting agencies in the United States.

17 6. Defendant collects and stores personal and credit information of millions of  
18 consumers residing in the United States. The collected and stored information  
19 includes consumers' social security information, address, date of birth, and credit  
20 card information.

21 7. Throughout the last years Defendant collected and stored the personal and  
22 credit information of Plaintiffs and all the consumers included in the Class.

23 8. On September 7, 2017, Equifax announced a cybersecurity incident  
24 potentially impacting 143 million US residents. From May to July 2017, third  
25 parties hacked Defendant's security system and accessed Defendant's database  
26 containing protected financial, personal, and credit information of millions of  
27 consumers.

28 9. Defendant, as a credit reporting agency that stores financial, personal, and

1 credit information of millions of customers, owed a duty to consumers like Plaintiffs  
2 to build and maintain a secure network to protect private consumer information from  
3 third party unauthorized access.

4 10. Defendant states in its Privacy Policy that it has reasonable physical,  
5 technical and procedural safeguards to protect consumers' personal information.

6 11. Plaintiffs and the members of the class relied on Defendant's  
7 representation that it had reasonable safeguards to protect their private information.

8 12. Defendant was at all times fully cognizant of its data protection  
9 obligations and knew that it had to take affirmative steps to protect consumer private  
10 information.

11 13. However, Defendant's treatment of the consumer private information of  
12 consumers like Plaintiffs fell woefully short of its legal duties and obligations.  
13 Defendant failed to ensure that access to its data systems was reasonably guarded  
14 and failed to maintain security systems to detect and deter the unauthorized access  
15 of third parties to consumers' personal and credit information.

16 14. Defendant knew that its failure to protect the personal and credit  
17 information of consumers like Plaintiffs from unauthorized access would create a  
18 serious risk of identity theft.

19 15. Defendant knew and should have known that its security system was  
20 inadequate and that a data breach, similar to the one that occurred from May to July  
21 2017, would eventually occur.

22 16. Defendant could have avoided the data breach occurred from May to July  
23 2017 by enhancing the security of its data system.

24 17. Defendant continues to breach its legal duties and obligations by creating  
25 a website, [www.equifaxsecurity2017.com](http://www.equifaxsecurity2017.com), a website for the purpose of checking  
26 whether a consumer's private information was breached in the May to July 2017  
27 breach.

28 18. The website is a stock installation of WordPress, a content management

1 system which does not provide enterprise grade security.

2 19. The website's Transport Layer Security Certificate does not perform  
3 proper revocation checks.

4 20. A user name for administering the website was left in a page hosted to the  
5 general public, [www.equifaxsecurity2017.com/wp-json/wp/v2/users/](http://www.equifaxsecurity2017.com/wp-json/wp/v2/users/). This website  
6 was subsequently taken down.

7 21. Per whois.com, [www.equifaxsecurity2017.com](http://www.equifaxsecurity2017.com) was not registered to  
8 Equifax.

9 22. As a result of the data breach occurred from May to July 2017, Plaintiffs  
10 had to pay \$29.99 to enroll in a credit monitor service for protection from potential  
11 identity theft.

12 23. Defendant breached its duties and obligations by using and deploying  
13 Struts, an open source model view controller framework for modern Java web  
14 application under the Apache Organization to build Equifax.com and other internal  
15 sites and Applications Programming Interfaces.

16 24. Defendant failed to conduct technical due diligence to ensure that new  
17 software including but not limited to Struts, a third party vendor, qualifies for  
18 reasonable security practices and standards.

19 25. Defendant's employees used company emails to create logins for non-  
20 company related websites, such as Zoosk.com.

21 26. Defendant failed to train, require, and administer employees to  
22 periodically change login passwords ensuring security of consumer private  
23 information.

24 27. Defendant failed to turn off debugging code while running code in  
25 production environment.

26 28. Defendant failed to encrypt consumer private information, including but  
27 not limited to consumer social security numbers.

28 29. Defendant saved consumer private information in plain text.

1 30. Defendant failed to store consumer credit card information in a separate  
2 and individual server that is not accessible from other drives.

3 31. Defendant saved consumer credit Card Verification Value in its databases.

4 32. Defendant failed to monitor database activity preventing breaches from  
5 third parties.

### 6 **CLASS ACTION ALLEGATIONS**

7 33. Plaintiffs bring this action on behalf of themselves and all other members  
8 of the Class, and allege all claims herein on a common, class-wide basis, pursuant to  
9 Fed. R. Civ. P. 23.

10 34. The Class is defined as follows: California consumers whose personal and  
11 credit information was collected and stored by Equifax Inc. and who had to pay to  
12 enroll in a credit monitoring system because they were subject to a risk of data loss,  
13 credit harm and identity theft as a result of the unauthorized access by third parties  
14 to Equifax Inc.'s data from May to July 2017.

15 35. All the Plaintiffs are members of the Class as defined above.

16 36. Excluded from the class are all attorneys for the Class, officers of  
17 Defendant, including officers and members of any entity with an ownership interest  
18 in Defendant, any judge who sits on the case, and all jurors and alternate jurors who  
19 sit on the case.

20 37. The exact number of aggrieved consumers in California can be  
21 determined based on Defendant's consumer database.

22 38. The members of the Class are readily ascertainable and Defendant likely  
23 has access to addresses and other contact information that may be used for providing  
24 to Class members.

25 39. All the members of the Class have suffered injuries as alleged in the  
26 complaint as a result of Defendant's failure to protect the personal and credit  
27 information of the members of the Class from unauthorized access by third parties.

28 40. The class is so numerous that joinder is impracticable. Upon information

1 and belief, the data breach at issue affected millions of consumers in the State of  
2 California.

3 41. There are substantial questions of law and fact common to the Class that  
4 predominate over questions affecting only individual Class members including, but  
5 not limited to, the following: whether Defendant owed a duty to the Plaintiffs and  
6 the Class to adequately protect their personal and credit information; whether  
7 Defendant breached its duty to protect the personal and credit information of the  
8 Class by failing to provide adequate security; whether Defendant's conduct or lack  
9 thereof was the direct and proximate cause of the breach of its systems which  
10 resulted in the loss of millions of consumers' personal and credit information;  
11 whether Defendant made a negligent misrepresentation by stating in its Privacy  
12 Policy that it had reasonable physical, technical and procedural safeguards to protect  
13 consumers' personal information; whether the Plaintiff sand Class members suffered  
14 financial injury as a result of Defendant's conduct or lack thereof; whether the  
15 Plaintiff and Class members are entitled to recover money damages.

16 42. Plaintiffs' claims are typical of the claims of the Class. Each member of  
17 the class suffered risk of data loss, credit harm and identity theft as a result of  
18 Defendant's negligent failure to safeguard their personal and credit information. The  
19 injuries of the Plaintiffs and other Class members are identical, and Plaintiffs'  
20 claims for relief are based upon the same legal theories as the claims of other Class  
21 members.

22 43. Plaintiffs will fairly and adequately protect and represent the interests of  
23 the Class because their claims are typical of the claims of the class, they are  
24 represented by locally respected attorneys who have experience handling consumer  
25 protection cases, who are qualified and competent, and who will vigorously  
26 prosecute this litigation, and their interests are not antagonistic or in conflict with  
27 the interest of the Class.

28 44. A class action is superior to all other available methods for the fair and

1 efficient adjudication of this lawsuit because individual litigation of the other Class  
2 members' claims is economically unfeasible and procedurally impracticable.  
3 Litigating the claims of the Class together will prevent varying, inconsistent, or  
4 contradictory judgments, and will prevent delay and unnecessary expense to the  
5 parties and the courts. A class action will be an efficient method of adjudicating the  
6 claims of the Class members who have suffered relatively small damages as a result  
7 of the same conduct of Defendant.

8 **FIRST COUNT**

9 **(Negligence)**

10 45. Plaintiffs incorporate and reallege all allegations set forth in paragraphs 1  
11 to 44.

12 46. Defendant owed a duty to Plaintiffs and Class members to use and  
13 exercise reasonable care to protect their personal, financial, and credit information  
14 from an unauthorized access by third parties.

15 47. Defendant owed a duty to Plaintiffs and Class members to provide  
16 security, consistent with industry standards and requirements, to ensure that its  
17 systems and network, and the personnel responsible for them, adequately protected  
18 the personal and credit information of consumers.

19 48. Defendant breached the duties owed to Plaintiffs and the Class members  
20 by failing to exercise reasonable care and implement and maintain adequate security  
21 system sufficient to protect the personal and financial information of consumers.

22 49. Defendant's breach of the duty owed to Plaintiffs and Class members  
23 created a foreseeable risk of data loss, credit harm and identity theft.

24 50. As a direct and proximate result of Defendant's negligent conduct,  
25 Plaintiffs and the Class members have suffered injury and are entitled to damages in  
26 an amount to be proven at trial.

27 ///

28 ///

**COUNT TWO**

**(Negligent Misrepresentation)**

1  
2  
3 51. Plaintiffs incorporate and reallege all allegations set forth in paragraphs 1  
4 to 44.

5 52. Defendant stated in its privacy policy that it had reasonable physical,  
6 technical and procedural safeguards to protect consumers' personal information.

7 53. Defendant's representation was not true because unauthorized third  
8 parties accessed Defendant's data which contained personal, financial, and credit  
9 information of millions of consumers.

10 54. Defendant had no reasonable grounds to believe that it had reasonable  
11 safeguards to protect consumers' personal and credit information because it knew or  
12 should have known that its security system was inadequate.

13 55. Plaintiffs and Class members reasonably relied on Defendant's  
14 representation.

15 56. As a direct and proximate result of Defendant's negligent  
16 misrepresentation Plaintiffs and Class members have suffered injury and are entitled  
17 to damages in an amount to be proven at trial.

**COUNT THREE**

**(Willful Violation of FCRA)**

18  
19  
20 57. Plaintiffs incorporate and reallege all allegations set forth in paragraphs 1  
21 to 44.

22 58. Plaintiffs and Class members are consumers entitled to protection of Fair  
23 Credit Reporting Act ("FCRA").

24 59. Defendant is a consumer reporting agency under the FCRA because for  
25 monetary fees it regularly engages in the practice of assembling or evaluating  
26 consumer credit information or other information on consumers for the purpose of  
27 furnishing consumer reports to third parties.

28 60. Under FCRA, Defendant is required to maintain reasonable procedures



1 designed to limit the furnishing of consumer reports to the purposes listed under  
2 section 1681b of the act.

3 61. Defendant willfully and recklessly failed to maintain reasonable  
4 procedures to limit the furnishing of consumer reports only for the purposes  
5 specified in section 1681b of the FCRA, and the personal and credit information of  
6 millions of consumers was disclosed to hackers who accessed Defendant's database.

7 62. Defendant willfully and recklessly violated the FCRA by providing  
8 impermissible access to consumer reports to unauthorized third parties and by  
9 failing to maintain reasonable procedures designed to limit the furnishing of  
10 consumer reports to the purposes outlined in section 1681b of the FCRA.

11 63. Defendant was aware of its duties under the FCRA however failed to  
12 maintain reasonable procedures to protect personal and credit information of  
13 millions of consumers.

14 64. Defendant's willful and reckless conduct provided a means for  
15 unauthorized intruders to obtain Plaintiffs' and Class members' personal  
16 information for no permissible purposes under the FCRA.

17 65. Plaintiffs and the Class members have been damaged by Defendant's  
18 willful or reckless failure to comply with the FCRA.

19 **COUNT FOUR**

20 **(Negligent Violation of FCRA)**

21 66. Plaintiffs incorporate and reallege all allegations set forth in paragraphs 1  
22 to 44.

23 67. Plaintiffs and Class members are consumers entitled to protection of  
24 FCRA.

25 68. Defendant is a consumer reporting agency under the FCRA because for  
26 monetary fees it regularly engages in the practice of assembling or evaluating  
27 consumer credit information or other information on consumers for the purpose of  
28 furnishing consumer reports to third parties.



1 purposes outlined in section 1785.11 of the CCRAA.

2 78. Defendant was aware of its duties under the CCRAA however failed to  
3 maintain reasonable procedures to protect personal and credit information of  
4 millions of consumers.

5 79. Defendant's willful conduct provided a means for unauthorized intruders  
6 to obtain Plaintiffs' and Class members' personal information for no permissible  
7 purposes under the CCRAA.

8 80. Plaintiffs and the Class members have been damaged by Defendant's  
9 willful or reckless failure to comply with the CCRAA.

10 **COUNT SIX**

11 **(Negligent Violation of CCRAA)**

12 81. Plaintiffs incorporate and reallege all allegations set forth in paragraphs 1  
13 to 44.

14 82. Plaintiffs and Class members are consumers entitled to protection  
15 CCRAA.

16 83. Defendant is a consumer reporting agency under the CCRAA because for  
17 monetary fees it regularly engages in the practice of assembling or evaluating  
18 consumer credit information or other information on consumers for the purpose of  
19 furnishing consumer reports to third parties.

20 84. Defendant was negligent in failing to maintain reasonable procedures  
21 designed to limit the furnishing of consumer reports for the purposes outlined under  
22 section 1785.11 of the CCRAA.

23 85. Defendant's negligent conduct provided a means for unauthorized  
24 intruder to obtain Plaintiffs' and the Class members' personal and credit  
25 information.

26 86. Plaintiffs and the Class members have been damaged by Defendant's  
27 negligent failure to comply with the CCRAA.

28 ///

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff, individually and on behalf of the proposed Class, respectfully request that the Court enter judgment in their favor as follows:

1. Certifying the Class under Fed. R. Civ. P. 23 and appointing Plaintiffs and their counsel to represent the class;
2. Awarding Plaintiffs and the Class monetary damages as allowable by law;
3. Awarding Plaintiffs and the Class appropriate equitable relief;
4. Awarding attorneys’ fees, costs and litigation expenses, as allowable by law;
5. Awarding punitive damages as allowable by law;
6. Awarding all such further relief as allowable by law.

**JURY TRIAL DEMANDED**

Plaintiffs, on behalf of themselves and the Class, demand a trial by jury on all triable issues.

DATED: September 10, 2017

**KAASS LAW**

By: /s/ Armen Kiramijyan  
Armen Kiramijyan, Esq.  
Lead Attorney for Plaintiffs

Hovsep Hovsepyan, Esq.  
Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

<b>I. (a) PLAINTIFFS</b> ( Check box if you are representing yourself <input type="checkbox"/> ) HENAN LOUIS JOOF, an individual, AKOP SOGOMONYAN, an individual, individually and on behalf of similarly situated California consumers;	<b>DEFENDANTS</b> ( Check box if you are representing yourself <input type="checkbox"/> ) EQUIFAX INC., a Georgia corporation;
(b) County of Residence of First Listed Plaintiff <u>Los Angeles</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i>	County of Residence of First Listed Defendant <u>Fulton</u> <i>(IN U.S. PLAINTIFF CASES ONLY)</i>
(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information. Armen Kiramijyan, Esq. (SBN 276723) KAASS LAW 313 E Broadway #944, Glendale, CA 91209	Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.)  <input type="checkbox"/> 1. U.S. Government Plaintiff <input type="checkbox"/> 2. U.S. Government Defendant <input type="checkbox"/> 3. Federal Question (U.S. Government Not a Party) <input checked="" type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> -For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant) <table style="width:100%; border: none;"> <tr> <td style="border: none;">Citizen of This State</td> <td style="border: none; text-align: center;">PTF DEF</td> <td style="border: none;">1 1</td> <td style="border: none;">Incorporated or Principal Place of Business in this State</td> <td style="border: none; text-align: center;">PTF DEF</td> <td style="border: none;">4 4</td> </tr> <tr> <td style="border: none;">Citizen of Another State</td> <td style="border: none; text-align: center;">2 2</td> <td style="border: none;">2 2</td> <td style="border: none;">Incorporated and Principal Place of Business in Another State</td> <td style="border: none; text-align: center;">5 5</td> <td style="border: none;">5 5</td> </tr> <tr> <td style="border: none;">Citizen or Subject of a Foreign Country</td> <td style="border: none; text-align: center;">3 3</td> <td style="border: none;">3 3</td> <td style="border: none;">Foreign Nation</td> <td style="border: none; text-align: center;">6 6</td> <td style="border: none;">6 6</td> </tr> </table>	Citizen of This State	PTF DEF	1 1	Incorporated or Principal Place of Business in this State	PTF DEF	4 4	Citizen of Another State	2 2	2 2	Incorporated and Principal Place of Business in Another State	5 5	5 5	Citizen or Subject of a Foreign Country	3 3	3 3	Foreign Nation	6 6	6 6
Citizen of This State	PTF DEF	1 1	Incorporated or Principal Place of Business in this State	PTF DEF	4 4														
Citizen of Another State	2 2	2 2	Incorporated and Principal Place of Business in Another State	5 5	5 5														
Citizen or Subject of a Foreign Country	3 3	3 3	Foreign Nation	6 6	6 6														

**IV. ORIGIN** (Place an X in one box only.)

1. Original Proceeding  
  2. Removed from State Court  
  3. Remanded from Appellate Court  
  4. Reinstated or Reopened  
  5. Transferred from Another District (Specify)  
  6. Multidistrict Litigation - Transfer  
  8. Multidistrict Litigation - Direct File

**V. REQUESTED IN COMPLAINT: JURY DEMAND:**  Yes  No (Check "Yes" only if demanded in complaint.)

**CLASS ACTION under F.R.Cv.P. 23:**  Yes  No      **MONEY DEMANDED IN COMPLAINT:** \$ To be determined

**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)  
 28 U.S.C. § 1332; As a result of Defendant's inadequate security system third party hackers accessed confidential consumer information

**VII. NATURE OF SUIT** (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	<b>Habeas Corpus:</b>	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	<b>TORTS</b>	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 140 Negotiable Instrument	<b>TORTS</b>	<b>PERSONAL PROPERTY</b>	<input type="checkbox"/> 530 General	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<b>PERSONAL INJURY</b>	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 535 Death Penalty	<b>SOCIAL SECURITY</b>
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 371 Truth in Lending	<b>Other:</b>	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 863 DIWC/DIWW (405 (g))
<input checked="" type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 330 Fed. Employers' Liability	<b>BANKRUPTCY</b>	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<b>FORFEITURE/PENALTY</b>	<b>FEDERAL TAX SUITS</b>
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 350 Motor Vehicle	<b>CIVIL RIGHTS</b>	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 891 Agricultural Acts	<b>REAL PROPERTY</b>	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 893 Environmental Matters	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 441 Voting	<b>LABOR</b>	
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 896 Arbitration	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision		<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 740 Railway Labor Act	
<input type="checkbox"/> 950 Constitutionality of State Statutes		<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 751 Family and Medical Leave Act	
			<input type="checkbox"/> 448 Education	<input type="checkbox"/> 790 Other Labor Litigation	
				<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

**VIII. VENUE:** Your answers to the questions below will determine the division of the Court to which this case will be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

<b>QUESTION A: Was this case removed from state court?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If "no," skip to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question E, below, and continue from there.	STATE CASE WAS PENDING IN THE COUNTY OF: <input type="checkbox"/> Los Angeles, Ventura, Santa Barbara, or San Luis Obispo <input type="checkbox"/> Orange <input type="checkbox"/> Riverside or San Bernardino	INITIAL DIVISION IN CACD IS: Western Southern Eastern
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<b>QUESTION B: Is the United States, or one of its agencies or employees, a PLAINTIFF in this action?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If "no," skip to Question C. If "yes," answer Question B.1, at right.	<b>B.1.</b> Do 50% or more of the defendants who reside in the district reside in Orange Co.?  check one of the boxes to the right →	<input type="checkbox"/> YES. Your case will initially be assigned to the Southern Division. Enter "Southern" in response to Question E, below, and continue from there.  <input type="checkbox"/> NO. Continue to Question B.2.
<b>B.2.</b> Do 50% or more of the defendants who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.)  check one of the boxes to the right →	<input type="checkbox"/> YES. Your case will initially be assigned to the Eastern Division. Enter "Eastern" in response to Question E, below, and continue from there.  <input type="checkbox"/> NO. Your case will initially be assigned to the Western Division. Enter "Western" in response to Question E, below, and continue from there.	

<b>QUESTION C: Is the United States, or one of its agencies or employees, a DEFENDANT in this action?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If "no," skip to Question D. If "yes," answer Question C.1, at right.	<b>C.1.</b> Do 50% or more of the plaintiffs who reside in the district reside in Orange Co.?  check one of the boxes to the right →	<input type="checkbox"/> YES. Your case will initially be assigned to the Southern Division. Enter "Southern" in response to Question E, below, and continue from there.  <input type="checkbox"/> NO. Continue to Question C.2.
<b>C.2.</b> Do 50% or more of the plaintiffs who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.)  check one of the boxes to the right →	<input type="checkbox"/> YES. Your case will initially be assigned to the Eastern Division. Enter "Eastern" in response to Question E, below, and continue from there.  <input type="checkbox"/> NO. Your case will initially be assigned to the Western Division. Enter "Western" in response to Question E, below, and continue from there.	

<b>QUESTION D: Location of plaintiffs and defendants?</b>	<b>A.</b> Orange County	<b>B.</b> Riverside or San Bernardino County	<b>C.</b> Los Angeles, Ventura, Santa Barbara, or San Luis Obispo County
Indicate the location(s) in which 50% or more of <i>plaintiffs who reside in this district</i> reside. (Check up to two boxes, or leave blank if none of these choices apply.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Indicate the location(s) in which 50% or more of <i>defendants who reside in this district</i> reside. (Check up to two boxes, or leave blank if none of these choices apply.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<b>D.1. Is there at least one answer in Column A?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If "yes," your case will initially be assigned to the SOUTHERN DIVISION.  Enter "Southern" in response to Question E, below, and continue from there.  If "no," go to question D2 to the right. →	<b>D.2. Is there at least one answer in Column B?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  If "yes," your case will initially be assigned to the EASTERN DIVISION.  Enter "Eastern" in response to Question E, below.  If "no," your case will be assigned to the WESTERN DIVISION.  Enter "Western" in response to Question E, below. ↓
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<b>QUESTION E: Initial Division?</b>	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, C, or D above: →	WESTERN

<b>QUESTION F: Northern Counties?</b>
Do 50% or more of plaintiffs or defendants in this district reside in Ventura, Santa Barbara, or San Luis Obispo counties? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET

**IX(a). IDENTICAL CASES:** Has this action been previously filed in this court?  NO  YES

If yes, list case number(s): \_\_\_\_\_

**IX(b). RELATED CASES:** Is this case related (as defined below) to any civil or criminal case(s) previously filed in this court?  NO  YES

If yes, list case number(s): \_\_\_\_\_

**Civil cases** are related when they (check all that apply):

- A. Arise from the same or a closely related transaction, happening, or event;
- B. Call for determination of the same or substantially related or similar questions of law and fact; or
- C. For other reasons would entail substantial duplication of labor if heard by different judges.

Note: That cases may involve the same patent, trademark, or copyright is not, in itself, sufficient to deem cases related.

**A civil forfeiture case and a criminal case** are related when they (check all that apply):

- A. Arise from the same or a closely related transaction, happening, or event;
- B. Call for determination of the same or substantially related or similar questions of law and fact; or
- C. Involve one or more defendants from the criminal case in common and would entail substantial duplication of labor if heard by different judges.

**X. SIGNATURE OF ATTORNEY**

**(OR SELF-REPRESENTED LITIGANT):** /s/ Armen Kiramijyan

DATE: 9/10/2017

**Notice to Counsel/Parties:** The submission of this Civil Cover Sheet is required by Local Rule 3-1. This Form CV-71 and the information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. For more detailed instructions, see separate instruction sheet (CV-071A).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

HENAN LOUIS JOOF, an individual, AKOP
SOGOMONYAN, an individual, individually and on
behalf of similarly situated California consumers;

Plaintiff(s)

v.

EQUIFAX INC., a Georgia corporation;

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) EQUIFAX INC.
1550 PEACHTREE STREET, NW
ATLANTA GA 30309

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you
are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ.
P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of
the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney,
whose name and address are:

ARMEN KIRAMIJYAN
KAASS LAW
313 East Broadway, #944
Glendale, California 91209

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.
You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk



Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_ , who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify)*:

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

**Print**

**Save As...**

**Reset**

NAME, ADDRESS, AND TELEPHONE NUMBER OF ATTORNEY(S)  
OR OF PARTY APPEARING IN PRO PER

CLEAR FORM

Armen Kiramijyan, Esq. (SBN 276723)  
Lead Attorney for Plaintiffs  
KAASS LAW  
313 East Broadway, #944  
Glendale, California 91209

ATTORNEY(S) FOR: Plaintiffs

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Henan Louis Joof, Akop Sogomonyan,  
individually and on behalf of the proposed class;  
  
Plaintiff(s),  
  
v.  
  
EQUIFAX INC., a Georgia corporation;  
  
Defendant(s)

CASE NUMBER:

**CERTIFICATION AND NOTICE  
OF INTERESTED PARTIES  
(Local Rule 7.1-1)**

TO: THE COURT AND ALL PARTIES OF RECORD:

The undersigned, counsel of record for Henan Louis Joof and Akop Sogomonyan  
or party appearing in pro per, certifies that the following listed party (or parties) may have a pecuniary interest in  
the outcome of this case. These representations are made to enable the Court to evaluate possible disqualification  
or recusal.

(List the names of all such parties and identify their connection and interest. Use additional sheet if necessary.)

PARTY	CONNECTION / INTEREST
Henan Louis Joof	Suffered damages
Akop Sogomonyan	Suffered damages
Equifax Inc.	Caused damages

September 10, 2017  
Date

/s/Armen Kiramijyan  
Signature

Attorney of record for (or name of party appearing in pro per):  
Henan Louis Joof and Akop Sogomonyan