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*Attorneys for Plaintiff,  
Florence Morris*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

**FLORENCE MORRIS,  
Individually and On Behalf of All  
Others Similarly Situated,**

**Plaintiff,**

**v.**

**EXPERIAN INFORMATION  
SOLUTIONS, INC.,**

**Defendant.**

**Case No.: '17CV573 BTM NLS**

**CLASS ACTION**

**COMPLAINT FOR DAMAGES AND  
INJUNCTIVE RELIEF PURSUANT  
TO:**

**THE FAIR CREDIT REPORTING  
ACT, 15 U.S.C. § 1681 ET SEQ.**

**JURY TRIAL DEMANDED**

## INTRODUCTION

1. Florence Morris (“Plaintiff”) brings this Class Action Complaint for damages, injunctive relief, and any other available legal or equitable remedies, resulting from the illegal actions of Experian Information Solutions, Inc. (“Defendant” or “Experian”), for willfully violating the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq (“FCRA”). Plaintiff alleges as follows upon personal knowledge as to herself and her own acts and experiences, and, as to all other matters, upon information and belief, including investigation conducted by her attorney.
2. Defendant is a “consumer reporting agency” under the FCRA that provides consumers with their credit reports. The FCRA-governed content of these credit reports is determined by the secretion of consumer reporting agencies such as Defendant. Defendant continuously misrepresents the source of the public record information (such as bankruptcies and civil judgments) Defendant publishes on credit reports (“Public Record Information”) in order to circumvent costs associated with purchasing the records from the actual source in violation of 15 U.S.C. § 1681g(a)(2).
3. Defendant works closely with vendors such as LexisNexis to obtain the Public Record Information, then Defendant represents on credit reports, that the Public Record Information originated from a public record such as a court or government entity, rather than the actual source, which is LexisNexis or another vendor.
4. This practice deceives consumers and limits consumers’ access to the true source of Public Record Information, therefore preventing consumers from directly addressing the true source of Public Record Information in order to ameliorate any errors if they should occur.

///

## JURISDICTION & VENUE

5. Original subject matter jurisdiction is valid in U.S. District Court for violations of the FCRA pursuant to 28 U.S.C. § 1331.
6. Venue is proper in this District under 28 U.S.C. § 1391(b) because Defendant transacts business here and because Plaintiff has resided in this District at all times relevant to these claims such that a substantial part of the events giving rise to Plaintiff's causes of action against Defendant occurred within this judicial district.
7. Venue is also proper in U.S. District Court, Southern District of California, pursuant to 28 U.S.C. § 1391(b) because Defendant is deemed to reside in any judicial district in which they are subject to personal jurisdiction at the time the action is commenced, and because Defendant's contacts with this District are sufficient to subject them to personal jurisdiction.

## PARTIES & DEFINITIONS

8. Plaintiff is, and at all times mentioned herein a natural person, individual citizen and resident of the State of California, County of San Diego, in this judicial district. Plaintiff is a "consumer" as defined by 15 U.S.C. § 1681a(c) of the FCRA.
9. Plaintiff is informed and believes, and thereon alleges, that Experian is, and at all times mentioned herein was, a corporation registered in Ohio with its principal place of business located in California. Plaintiff alleges that at all times relevant herein Experian conducted business in the State of California, in the County of San Diego, within this judicial district.
10. The causes of action herein pertain to Plaintiff's "consumer credit reports", as defined by 15 U.S.C. § 1681a(d)(1) of the FCRA, in that inaccurate

misrepresentations of Plaintiff's information were made via written, oral, or other communication of information by a consumer credit reporting agency, which is used or is expected to be used, or collected in whole or in part, for the purpose of serving as a factor in establishing Plaintiff's eligibility for, among other things, credit to be used primarily for personal, family, or household purposes, and employment purposes.

### FACTUAL ALLEGATIONS

11. Experian is a FCRA-governed "consumer reporting agency" that selectively decides which information to provide to consumers that request the FCRA-governed information in Defendant's possession and which information it will hide from consumers. Defendant withholds certain information in order to minimize its compliance costs and to avoid customer service inquiries directed at them and their business partners or private vendors. As mentioned above, these private vendors and/or business partners include companies like LexisNexis, a third party that sells public record information to Defendant and then, in turn, processes disputes regarding that public record information via the "ACDV" system.
12. Upon information and belief, Defendant misrepresents the source of consumers' bankruptcy Public Record Information by falsely stating that a given courthouse is the source of the Public Record Information, while affirmatively hiding the true source of the Public Record Information.
13. Upon information and belief, Defendant does not obtain its Public Record Information about bankruptcies from courthouses or actual government entities.
14. Defendant obtains information about bankruptcies, court judgments, and liens from private vendors such as LexisNexis.

- 1 15. The Public Record Information provided on Experian credit reports is not the  
2 actual court record, rather, an abbreviated version of the Public Record  
3 Information, which does not contain all the information in actual public  
4 records such as those of courthouses or the government. This leads to a large  
5 number of mistakes reflected in the Public Record Information on consumers'  
6 Experian credit reports.
- 7 16. The mistakes in consumer credit reports are seen by anyone that requests that  
8 consumer's file, and oftentimes cause injury to that consumer.
- 9 17. The FCRA requires credit reporting agencies including Defendant to "clearly  
10 and accurately disclose to the consumer the sources of the information" in the  
11 consumer's credit report under 15 U.S.C. § 1681g(a)(2).
- 12 18. It is imperative that consumers know the true source of the Public Record  
13 Information in their credit reports and have the ability to directly address the  
14 true source of Public Record Information in order to ameliorate any mistakes  
15 in the Public Record Information on credit reports.
- 16 19. On or around May 4, 2016, Plaintiff checked her Experian credit report and  
17 the Public Record Information listed the source of Plaintiff's Chapter 7  
18 bankruptcy information as "US BANKRUPTCY COURT OKLAHOMA  
19 CITY 215 DEAN A MCGEE AVE STE 147 OKLAHOMA CITY OK 73102,  
20 (405) 609-5700", rather than LexisNexis, the actual source of the information.
- 21 20. There is only an "Identification Number" which is not the correct  
22 identification associated with the case, nor is it even the correct format for a  
23 bankruptcy case number.
- 24 21. On or around December 20, 2016, Plaintiff mailed Defendant a dispute  
25 regarding the inaccurate source of the Public Record Information on her May  
26 4, 2016 credit report.
- 27 22. Plaintiff specifically wrote in the dispute, "The Public Records bankruptcy  
28 source of information is incorrect."

23. On January 10, 2017, Defendant completed its investigation of Plaintiff's dispute, and the Public Record Information remained unchanged, listing the source of the Public Record Information as "US BANKRUPTCY COURT OKLAHOMA CITY 215 DEAN A MCGEE AVE STE 147 OKLAHOMA CITY OK 73102, (405) 609-5700".
24. On information and belief, Defendant did not obtain its Public Record Information concerning Plaintiff from the U.S. Bankruptcy Court. It would be far too costly and cumbersome for Defendant to obtain that information directly from the court, if it is even possible.
25. Bankruptcy courts have converted to electronic filing and files now and use ECF and PACER. The bankruptcy courts do not have paper files for all the bankruptcies that can be pulled to gather public record information.
26. Upon information and belief, Defendant obtained its Public Record Information concerning Plaintiff from one of its private vendors and/or business partners such as LexisNexis that most likely obtains the information from PACER and then processes and organizes the information so Defendant or LexisNexis can pair the information with consumer files.
27. Defendant never identified LexisNexis or any other vendor as the source of the public record information that makes its way into the consumer credit files that it sells, or any of the other less publicized marketing or risk assessment databases that it maintains.
28. Defendant unambiguously deprived Plaintiff of the true source of the valuable Public Record Information, in violation of the FCRA.
29. At all times during the aforementioned actions, there was in full force and effect the following obligations pertaining to Defendant, pursuant to 15 U.S.C. § 1681g(a)(2):

Every consumer reporting agency shall, upon request, and subject to section 1681h(a)(1) of this title, clearly

and accurately disclose to the consumer: The sources of the information; except that the sources of information acquired solely for use in preparing an investigative consumer report and actually used for no other purpose need not be disclosed: Provided, That in the event an action is brought under this subchapter, such sources shall be available to the plaintiff under appropriate discovery procedures in the court in which the action is brought.

30. At all times during the aforementioned actions, there was in full force and effect the following obligations pertaining to Defendant, pursuant to 15 U.S.C. § 1681e(a)&(b) of the FCRA:

(a) Identity and purposes of credit users. Every consumer reporting agency shall maintain reasonable procedures designed to avoid violations of section 605 [15 USC § 1681c] and to limit the furnishing of consumer reports to the purposes listed under section 604 [15 USC § 1681b]. These procedures shall require that prospective users of the information identify themselves, certify the purposes for which the information is sought, and certify that the information will be used for no other purpose. Every consumer reporting agency shall make a reasonable effort to verify the identity of a new prospective user and the uses certified by such prospective user prior to furnishing such user a consumer report. No consumer reporting agency may furnish a consumer report to any person if it has reasonable grounds for believing that the consumer report will not be used for a purpose listed in section 604 [15 USC § 1681b].

(b) Accuracy of report. Whenever a consumer reporting agency prepares a consumer report it shall follow reasonable procedures to assure maximum possible accuracy of the information concerning the individual about whom the report relates.

#### CLASS ACTION ALLEGATIONS



1 31. Plaintiff brings this action on behalf of herself and on behalf of all others  
2 similarly situated (the "Class").

3 32. Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiff brings  
4 this action for herself and on behalf of a Class defined as follows:

5 All persons within the United States who (a) requested  
6 their consumer credit reports from Experian or any of its  
7 affiliated companies, subsidiaries, or any other Experian  
8 entity (b) within the five years prior to the filing of this  
9 Complaint and during its pendency and (c) to whom  
10 Experian provided a response that did not include any  
11 reference to its public records vendor as the source of  
12 public records information within the consumer's file  
13 disclosure.

14 33. Defendant and its employees or agents are excluded from the Class.

15 34. Plaintiff incorporates the prior allegations and estimates that the class is so  
16 numerous that joinder of all members is impractical. Although the precise  
17 number of Class members is known only to Defendant, Experian sends tens of  
18 thousands of consumer credit report disclosures per year, and Defendant's  
19 uniform practice and procedure is to always omit the true source of its public  
20 records information from such disclosures. Accordingly, Plaintiff estimates  
21 that the class size numbers in the thousands.

22 35. Upon information and belief, the consumer credit reports for Plaintiff and the  
23 member of the Class do not contain the actual source of the public records  
24 information that it reported about the Plaintiffs and the putative class  
25 members. This omission has remained consistent and uniform across time,  
26 jurisdictions, and consumers.

27 36. There are questions of law and fact common to the Class, which common  
28 issues predominate over any issues involving only individual class members.  
For example and without limitation:



- a. whether Defendant misrepresented the true source of its Public Record Information in its consumer credit report disclosures;
- b. whether this failure was a result of the Defendant's standard operating procedure when responding to a consumer's request for a full copy of her or her credit, file;
- c. whether the Defendant's conduct constituted a violation of the FCRA;
- d. whether the Defendant's conduct was willful; and
- e. the appropriate amount of statutory and/or punitive damages that are appropriate for such a violation.

37. Plaintiff's claims are typical of those of the Class members. All are based on the same facts and legal theories. Defendant's response to a consumer's request for a full copy of his or her consumer credit report routinely failed to include any information about source of Public Record Information included on disclosures sent during the full class period. The violations alleged are the same and the class claim will rise and fall entirely based upon whether or not Plaintiff's claim rises or falls.

38. Plaintiff will fairly and adequately protect the interests of the Class. Plaintiff has retained counsel experienced in handling actions involving unlawful practices against consumers and class actions. Neither Plaintiff nor her counsel has any interest that might cause her not to vigorously pursue this action. Plaintiff is aware of her responsibilities to the putative classes and has accepted such responsibilities.

39. Certification of a class under Rule 23(b)(1) of the Federal Rules of Civil Procedure is proper. Prosecuting separate actions by or against individual class members would create a risk of adjudications with respect to individual class members that, as a practical matter, would be dispositive of the interests of the other members not parties to the individual adjudications or would substantially impair or impede their ability to protect their interests.

1 40. Certification of a class under Rule 23(b)(2) of the Federal Rules of Civil  
2 Procedure is appropriate in that the Defendant has acted on grounds generally  
3 applicable to the class thereby making appropriate declaratory relief with  
4 respect to the class as a whole.

5 41. Certification of the Class under Rule 23(b)(3) of the Federal Rules of Civil  
6 Procedure is also appropriate in that:

7 a. As alleged above, the questions of law or fact common to the  
8 members of the Class predominate over any questions affecting an  
9 individual member. Each of the common facts and legal questions in  
10 the case overwhelm the more modest individual damages issues.  
11 Further, those individual issues that do exist can be effectively  
12 streamlined and resolved in a manner that minimizes the individual  
13 complexities and differences in proof in the case.

14 b. A class action is superior to other available methods for the fair and  
15 efficient adjudication of the controversy. Consumer claims generally  
16 are ideal for class treatment as they involve many, if not most,  
17 consumers who are otherwise disempowered and unable to afford and  
18 bring such claims individually. Further, most consumers affected by  
19 the Defendant's FCRA violation would likely be unaware of their  
20 rights under the law, or who they could find to represent them in  
21 federal litigation. Additionally, individual litigation of the uniform  
22 issues in this case would be a waste of judicial resources. The issues  
23 at the core of this case are class wide and should be resolved at one  
24 time. One win for one consumer would set the law as for every  
25 similarly situated consumer.

26 42. The Defendant's failure to disclose all information in the consumer's credit  
27 report, including the sources of the Public Record Information, in response to  
28

a consumer's request for this information violated 15 U.S.C. § 1681g(a)(2) and 15 U.S.C. § 1681e(a)&(b) as to the Plaintiff and the Class members.

43. The conduct, action, and inaction of the Defendant was willful, rendering the Defendant liable for statutory and punitive damages in an amount to be determined by the Court pursuant to 15 U.S.C. § 1681n.

44. Plaintiff and the Class members are entitled to recover costs and attorney's fees, as well as appropriate equitable relief, from the Defendant, in an amount to be determined by the Court pursuant to 15 U.S.C. § 1681n. In the alternative, the violation was negligent entitling the Plaintiffs and the Class to actual damages in the amount of the value of their consumer disclosure.

**CAUSE OF ACTION  
FAIR CREDIT REPORTING ACT  
15 U.S.C. § 1681 ET SEQ.**

45. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.

46. The foregoing acts and omissions constitute numerous and multiple violations of the FCRA.

47. As a credit reporting agency, Experian is required to comply with 15 U.S.C. § 1681g(a)(2) of the FCRA.

48. Experian violated 15 U.S.C. § 1681g(a)(2) by failing to clearly and accurately disclose to Plaintiff and the Class the sources that supplied any information to the credit-reporting agency about Plaintiff and the Class.

49. Plaintiff is informed and believes that Experian violated 15 U.S.C. §§ 1681e(a)&(b) of the FCRA by maintaining the very inaccurate information about which Plaintiff reported.

50. As a result of each and every violation of the FCRA, Plaintiff and the Class are entitled to actual damages, pursuant to 15 U.S.C. § 1681o(a)(1); and reasonable attorney fees and costs pursuant to 15 U.S.C. § 1681o(a)(2).

51. As a result of each and every willful violation of the FCRA, Plaintiff and the Class are also entitled to and seek actual damages of \$100.00 to \$1,000.00 per violation and such amount as the court may allow, pursuant to 15 U.S.C. § 1681n(a)(1)(A); punitive damages as the court may allow, pursuant to 15 U.S.C. § 1681n(a)(2); and reasonable attorney fees and costs pursuant to 15 U.S.C. § 1681n(a)(3).

#### PRAYER FOR RELIEF

**WHEREFORE**, Plaintiff and the Class members pray for judgment as follows against Defendant:

- Certify the Class as requested herein;
- Appoint Plaintiff to serve as the Class Representative in this matter;
- Appoint Plaintiff's Counsel as Class Counsel in this matter;
- Provide such further relief as may be just and proper.

In addition, Plaintiff and the Class members pray for further judgment as follows against Defendant:

#### FAIR CREDIT REPORTING ACT 15 U.S.C. § 1681 ET SEQ.

- Actual damages pursuant to 15 U.S.C. § 1681o(a)(1);
- Statutory damages of \$1,000.00 per violation per plaintiff, per month of reporting, pursuant to 15 U.S.C. § 1681n(a)(1);
- Punitive damages as the court may allow pursuant to 15 U.S.C. § 1681n(a)(2);
- Injunctive relief to command Experian to correct the information furnished on Plaintiff's and the Class's credit reports and prohibit them from engaging in future violations;
- Attorney fees and costs to maintain the instant action, pursuant to 15 U.S.C. §§ 1681n(a)(3) and 1681o(a)(2);
- Any other relief the Court may deem just and proper including interest.

**TRIAL BY JURY**

52. Pursuant to the Seventh Amendment to the Constitution of the United States of America, Plaintiff is entitled to, and demand, a trial by jury.

Dated: March 23, 2017

Respectfully submitted,

**KAZEROUNI LAW GROUP, APC**

By: s/ ABBAS KAZEROUNIAN  
ABBAS KAZEROUNIAN, ESQ.

Additional Plaintiff's Counsel:

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## CIVIL COVER SHEET

The JS 44 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, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

Florence Morris, individually and on behalf of all others similarly situated

(b) County of Residence of First Listed Plaintiff **San Diego**  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Abbas Kazerounian, Esq., Kazerouni Law Group, APC (800) 400-6808  
245 Fischer Avenue, Unit D1, Costa Mesa, CA 92626

**DEFENDANTS**

Experian Information Solutions, Inc.

County of Residence of First Listed Defendant  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**'17CV573 BTM NLS****II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question  
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

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

**V. 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

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
**15 U.S.C. § 1681 et seq. ("FCRA")**

Brief description of cause:

Defendant violated the Fair Credit Reporting Act

**VII. REQUESTED IN COMPLAINT:**

☒ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

**DEMAND \$**  
5,000,000.00

CHECK YES only if demanded in complaint:

**JURY DEMAND:** ☒ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

03/23/2017

SIGNATURE OF ATTORNEY OF RECORD

s/ Abbas Kazerounian

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

Print

Save As...

Reset

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
  - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
  - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
- United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an "X" in one of the six boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.



# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Experian Sued for Disguising True Source of Public Record Information](#)

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