

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

| | | |
|--|---|------------------------|
| JOHN E. PITALE, <i>individually and on behalf of a</i> |) | |
| <i>class of similarly situated persons,</i> |) | |
| |) | Civil Action No. _____ |
| Plaintiff, |) | |
| v. |) | |
| |) | |
| EXPERIAN INFORMATION SOLUTIONS, INC., |) | |
| |) | |
| Defendant. |) | |
| |) | |

CLASS ACTION COMPLAINT

COME NOW, Plaintiff, John E. Pitale, individually and on behalf of a class of similarly situated individuals, by counsel and for his Complaint against Defendant, Experian Information Solutions, Inc. (“Experian”), he alleges as follows:

INTRODUCTION

1. This is a consumer class action brought for a willful violation of the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (“FCRA”), against Defendant Experian Information Solutions, Inc. (“Experian”). Plaintiff was denied a mortgage loan and suffered delays in obtaining his security clearance because Experian inaccurately reported public records regarding Plaintiff. This lawsuit challenges the manner in which Experian reports these public records.

2. Before the enactment of the FCRA, inaccurate and misleading information was identified as “the most serious problem in the credit reporting industry.” 115 Cong. Rec. 2411 (Jan. 31, 1969). With this problem in mind, Congress enacted the FCRA in 1970 to ensure the “confidentiality, accuracy, relevancy, and proper utilization” of credit reports. 15 U.S.C. § 1681(b). To accomplish Congress’ goals, the FCRA contains a variety of requirements to protect consumers, including § 1681e(b), which is one of the cornerstone provisions of the FCRA.

Whenever a consumer reporting agency (“CRA”) prepares a consumer report, § 1681e(b) requires the CRA to follow reasonable procedures to assure maximum possible accuracy of the information concerning the individual about whom the report relates. 15 U.S.C. § 1681e(b). This section imposes a high, and often disregarded, standard on CRAs. *See, e.g., Burke v. Experian Info. Sols., Inc.*, 2011 WL 1085874, at *4 (E.D. Va. Mar. 18, 2011) (breaking down the requirements of § 1681e(b), and explaining that “ ‘assure’ means ‘to make sure or certain: put beyond all doubt,’” “[m]aximum’ means the ‘greatest in quantity or highest degree attainable[,]’ and ‘possible’ means something ‘falling within the bounds of what may be done, occur or be conceived’” (quoting *Webster’s Third New International Dictionary* 133, 1396, 1771 (1993))).

3. Experian is a consumer reporting agency that compiles information on consumers from a variety of sources to include in the reports it sells to third parties. As part of this process, Experian uses an automated and systematic procedure to gather derogatory public records, such as tax liens and judgments recorded in Florida, Kentucky, and Michigan. However, Experian does not follow similar procedures to gather updated information when the tax lien or judgment is released, satisfied, vacated, or otherwise removed. Experian’s failure to timely gather updated information in Florida, Kentucky, and Michigan is a violation of 15 U.S.C. § 1681e(b) because Experian has not implemented reasonable procedures to ensure the maximum possible accuracy of the consumer reports regarding Plaintiff and the class members.

JURISDICTION

4. The Court has jurisdiction under the FCRA, 15 U.S.C. § 1681p and 28 U.S.C. § 1331.

5. Venue is proper in this Court under 28 U.S.C. § 1391(b) as Plaintiff is a resident

of Alexandria, Virginia, and a substantial part of the events giving rise to the claim occurred in this District.

PARTIES

6. Plaintiff John E. Pitale (“Mr. Pitale” or “Plaintiff”) is a natural person and a “consumer” as defined by § 1681a(c) of the FCRA. Mr. Pitale is a resident of this District and Division.

7. Defendant Experian Information Solutions, Inc. (“Experian”) is a foreign limited liability company authorized to do business in Maryland. Experian is a “consumer reporting agency” as defined in 15 U.S.C. §1681a(f). Experian is regularly engaged in the business of assembling, evaluating, and disbursing information concerning consumers for the purpose of furnishing consumer reports, as defined in 15 U.S.C. §1681a(d) to third parties.

FACTS

A. Experian’s Procedures.

8. Unlike its treatment of credit accounts, Experian affirmatively seeks out and purchases derogatory public records data, including tax liens and civil judgments, for inclusion in the credit reports it sells.

9. It proactively gathers and disseminates this derogatory information even though there is nothing in the FCRA that affirmatively requires it to do so.

10. Experian obtains its public records from a single third party company, LexisNexis.

11. During all times relevant to this action, Experian has never done any independent audit of the substantive accuracy of the public records it purchases from LexisNexis. While

Experian claims to have done statistical or data integrity reviews, it has never systematically compared the LexisNexis records it receives to the actual public records in the courthouse.

12. Experian has long been aware of the problems alleged herein and of the failure of its current procedures to ensure complete and accurate public records.

13. As recently as 2015, the Consumer Financial Protection Bureau informed Experian that it had found that Experian's oversight of LexisNexis "was weak and required corrective action" as it "did not have defined processes to verify the accuracy of public record information provided" by LexisNexis.

14. After an unbroken history of inadequate public records reporting, Experian just this year announced a tentative plan to change its procedures to cease reporting the records it purchases from LexisNexis when it cannot contemporaneously obtain dispositions.

15. Experian made these changes to its public records procedures and standards only because of a settlement with the attorneys general of several states. The settlement "resolve[d] a multiyear investigation focused on consumer disputes about accuracy of consumer credit reports" and "monitoring and disciplining providers of credit reporting information (also known as data furnishers)."¹

16. Prior to this, Experian did not follow reasonable procedures to gather updated information from the courts when the civil judgments are satisfied, vacated, appealed, or similarly dismissed.

¹ Press Release, Brian E. Frosh, Attorney General, AG Frosh Announces Settlement with Credit Reporting Agencies Equifax, Experian and TransUnion Agree to Significant Consumer-Friendly Changes (May 20, 2015), <http://www.marylandattorneygeneral.gov/press/2015/052015.pdf>.

17. Rather, Experian published public records information that it knew would be inaccurate if a satisfaction, dismissal, vacatur, or appeal had later occurred—relying on consumers to clean up their own files via the dispute process after learning of the inaccuracy rather than paying to have these dispositions adequately and reasonably collected with the same vigor that it collected records of the initial entry of judgment.

18. At all times pertinent to this Complaint, Experian’s conduct regarding the collection of judgment disposition information was willful and carried out in reckless disregard for a consumer’s rights as set forth under the FCRA. By example only and without limitation, Experian’s conduct is willful because it was intentionally accomplished through intended procedures to maximize its revenues through the sale of derogatory information as derogatory information is of greater economic value to its paying customers than “disposition” information. Experian has also been on notice of these issues throughout the pendency of the multiple actions brought against it and its industry allies, Equifax and TransUnion. *See, e.g., Soutter v. Equifax Info. Servs., LLC*, 307 F.R.D. 183, 191 (E.D. Va. 2015); *Ceccone v. Equifax Info. Servs., LLC*, 2015 WL 221720, at *1 (D.D.C. Jan. 15, 2015); *Williams v. Experian Info. Solutions, Inc.*, Case No. 1:13-cv-1102 (E.D. Va. 2013); *Beattie v. Experian Info. Solutions, Inc.*, Case No. 1:13-cv-1195 (E.D. Va. 2013); *Gudauskas v. Equifax Info. Servs., LLC*, Case No. 1:14-cv-01307 (E.D. Va. 2014); *Knuth v. Toyota Motor Credit Corp.*, 1:15-cv-349 (E.D. Va. 2015).

19. As a result of Experian’s conduct, Plaintiff and the putative class members suffered particularized and concrete injuries, including damage to their reputations, reductions to their credit scores, and increased risks that they would be denied credit.

B. Mr. Pitale's Experience.

20. Over the past two years, Experian has furnished Plaintiff's credit report to multiple third parties, including the United States Office of Personnel Management when Plaintiff was under review for a security clearance.

21. The consumer reports published by Experian included inaccurate information, including unsatisfied tax liens recorded in Florida, Kentucky, and Michigan.

22. For example, as late as August 2016, Plaintiff's credit report with Experian showed an outstanding tax lien against him recorded in the Orange County Circuit Court in Orlando, Florida.

23. This inaccurate information was included in Plaintiff's credit reports because Experian failed to follow reasonable procedures to assure the maximum possible accuracy in the preparation of Plaintiff's credit reports.

24. In Plaintiff's instance, if Experian had followed such procedures, it would have reported an update in the records showing that the lien was satisfied on July 13, 2013—more than three years earlier.

25. Yet, upon information and belief, Experian failed to adopt reasonable procedures (or any procedures whatsoever) to update and correct its public record information concerning liens and judgments recorded in Florida.

26. Likewise, Experian failed to adopt reasonable procedures (or any procedures whatsoever) to update and correct its public record information concerning liens and judgments recorded in Michigan and Kentucky—as evidenced by other outstanding liens in Plaintiff's file, which had been satisfied.

27. Experian's failure to timely gather updated information regarding these records is a violation of 15 U.S.C. § 1681e(b) because Experian has not implemented reasonable procedures to ensure the maximum possible accuracy in the preparation of the consumer reports it publishes.

COUNT ONE:
15 U.S.C. §1681e(b)
Class Claim

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

29. **The Florida Class.** Pursuant to Fed. R. Civ. P. 23, Plaintiff brings this action individually and on behalf of a class initially defined as follows ("the Florida Class"):

All natural persons who meet every one of the following definitional requirements: the records from a governmental agency in Florida show that the person was subject to a tax lien or judgment that was released, satisfied, withdrawn, vacated, or otherwise dismissed on or before July 31, 2017; and (2) Experian's records note that it furnished a credit report regarding the person that included the outstanding lien or judgment thirty (30) or more days after the filing of the order releasing, satisfying, withdrawing, vacating, or otherwise dismissing the lien or judgment.

30. **The Michigan Class.** Pursuant to Fed. R. Civ. P. 23, Plaintiff brings this action individually and on behalf of a class initially defined as follows ("the Michigan Class"):

All natural persons who meet every one of the following definitional requirements: (1) the records from a governmental agency in Michigan show that the person was subject to a tax lien or judgment that was released, satisfied, withdrawn, vacated, or otherwise dismissed on or before July 31, 2017; and (2) Experian's records note that it furnished a credit report regarding the person that included the outstanding lien or judgment thirty (30) or more days after the filing of the order releasing, satisfying, withdrawing, vacating, or otherwise dismissing the lien or judgment.

31. **The Kentucky Class.** Pursuant to Fed. R. Civ. P. 23, Plaintiff brings this action individually and on behalf of a class initially defined as follows ("the Kentucky Class"):

All natural persons who meet every one of the following definitional requirements: (1) the records from a governmental agency in Kentucky show that the person was subject to a tax lien or judgment that was released, satisfied, withdrawn, vacated, or otherwise dismissed on or before July 31, 2017; and (2) Experian's records note that it furnished a credit report regarding the person that included the outstanding lien or judgment was furnished thirty (30) or more days after the filing of the order releasing, satisfying, withdrawing, vacating, or otherwise dismissing the lien or judgment.

32. **Numerosity.** Upon information and belief, Plaintiff alleges that the FCRA Class is so numerous that joinder of the claims of all class members is impractical. The names and addresses of the class members are identifiable through documents maintained by Experian and through available records from Florida, Michigan, and Kentucky, and the class members may be notified of the pendency of this action by published and/or mailed notice.

33. **Existence and Predominance of Common Questions of Law and Fact.** Common questions of law and fact exist as to all putative class members. These questions predominate over the questions affecting only individual members. These common legal and factual questions include, among other things: (a) whether Experian adopted procedures that collected and reported updates to liens that were less systematic and effective than those it used to initially collect and report the liens; (b) whether this conduct constituted a violation of the FCRA; and (c) whether the violation was negligent, reckless, knowing, or intentionally committed in conscious disregard of the rights of Plaintiff and putative class members.

34. **Typicality.** Plaintiff's claims are typical of the claims of each putative class member and all are based on the same facts and legal theories. Plaintiff, as every putative class member, alleges a violation of the same FCRA provision, 15 U.S.C. §1681e(b). This claim challenges the credit reporting procedures of Experian and does not depend on any individualized facts. Upon information and belief, Experian obtains all of its records from

Florida, Michigan, and Kentucky under the same contract from the same vendor. Experian's notice and knowledge of the challenged reporting problem is the same for Plaintiff as for the putative class. For purposes of class certification, Plaintiff seeks only statutory and punitive damages. Plaintiff would seek individual or actual damages only if class certification is denied. In addition, Plaintiff is entitled to the relief under the same causes of action as the other members of the class.

35. **Adequacy.** 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 his counsel have any interests that might cause them not to vigorously pursue this action. Plaintiff is aware of his responsibilities to the putative class and has accepted such responsibilities.

36. Certification of the class under Rule 23(b)(3) of the Federal Rules of Civil Procedure is also appropriate in that:

a. As alleged above, the questions of law or fact common to the members of the classes predominate over any questions affecting an individual member. Each of the common facts and legal questions in the case overwhelm the more modest individual damages issues. The statutory and punitive damages sought by each member are such that the individual prosecution would prove burdensome and expensive given the complex and extensive litigation necessitated by Experian's conduct. Further, those individual issues that do exist can be effectively streamlined and resolved in a manner that minimizes the individual complexities and differences in proof in the case.

b. A class action is superior to other available methods for the fair and

efficient adjudication of the controversy. Consumer claims generally are ideal for class treatment as they involve many, if not most, consumers who are otherwise disempowered and unable to afford and bring such claims individually. Further, most consumers affected by Experian's conduct described above are likely unaware of their rights under the law or of whom they could find to represent them in federal litigation. Individual litigation of the uniform issues in this case would be a waste of judicial resources. The issues at the core of this case are class wide and should be resolved at one time. One win for one consumer would set the law for every similarly situated consumer.

37. Experian 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 putative class members.

38. As a result of Experian's conduct, Plaintiff and the putative class members suffered particularized and concrete injuries, including damage to their reputations, reductions to their credit scores, and increased risks that they would be denied credit.

39. Experian's violation of 15 U.S.C. § 1681e(b) was willful, rendering Experian liable pursuant to 15 U.S.C. § 1681n. In the alternative, Experian was negligent entitling Plaintiff to recover under 15 U.S.C. § 1681o.

40. Plaintiff and the putative class members are entitled to recover statutory damages, punitive damages, costs, and attorneys' fees from Experian in an amount to be determined pursuant to 15 U.S.C. §§ 1681n and 1681o.

WHEREFORE, Plaintiff, on behalf of himself and the putative class members, moves for class certification, for statutory and punitive damages, his attorney's fees, costs and such other

relief the Court does deem just, equitable, and proper.

TRIAL BY JURY IS DEMANDED.

Respectfully submitted,

JOHN E. PITALE

By: /s/ Andrew J. Guzzo

Counsel

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Counsel for Plaintiff

JS 44 (Rev. 12/12)

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
John E. Pitale

DEFENDANTS
Experian Information Solutions, Inc.

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

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

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

(c) Attorneys (Firm Name, Address, and Telephone Number)
Kristi C. Kelly & Andrew J. Guzzo/ Kelly & Crandall, PLC
3925 Chain Bridge Road, Ste. 202 Fairfax, VA 22030
(703) 424-7570

Attorneys (If Known)

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 Tort Contract Product Liability <input type="checkbox"/> 196 Franchise | PERSONAL INJURY <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 | PERSONAL INJURY <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 PERSONAL PROPERTY <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 LABOR <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 IMMIGRATION <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 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <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)) FEDERAL TAX SUITS <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 |
| REAL PROPERTY | CIVIL RIGHTS | PRISONER PETITIONS | | | |
| <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 | <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 | Habeas Corpus: <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 Other: <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
Brief description of cause:
Violation of the Fair Credit Reporting Act

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ _____ CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE _____ SIGNATURE OF ATTORNEY OF RECORD _____

7-31-17 Andrew Guzzo

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Experian Hit with Another Class Action Alleging Inaccurate Credit Reporting](#)
