

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

NATALIE WOOD, individually
and as a representative of the class,

Case No.

Plaintiff,

CLASS ACTION COMPLAINT

v.

JURY TRIAL DEMANDED

ONE SOURCE TECHNOLOGY, LLC,
D/B/A ASURINT,

Defendant.

COMES NOW, Plaintiff Natalie Wood (“Plaintiff”), on behalf of herself and the classes set forth below and states as follows:

INTRODUCTION

1. This is a class action for damages, costs and attorneys’ fees brought against Defendant One Source Technology, LLC, doing business as Asurint (“Defendant” or “Asurint”) pursuant to the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (“FCRA”).

2. Defendant is a consumer reporting agency that compiles and maintains files on consumers on a nationwide basis. It maintains an extensive database of public records regarding consumers. It then sells consumer reports generated from its database and furnishes these consumer reports to employers who use the reports to make decisions regarding employees and applicants.

3. Defendant inaccurately reported to Plaintiff’s potential employer that Plaintiff had been convicted of several crimes, when those convictions had in fact been expunged years earlier. Defendant’s report cost Plaintiff her job. Defendant also inaccurately reported these

charges multiple times on the same report, making Plaintiff's (expunged) background look much worse than it was.

4. On behalf of herself and two classes of similarly situated individuals, Plaintiff brings claims pursuant to § 1681e(b) of the FCRA. Defendant does not employ reasonable procedures to ensure the maximum possible accuracy of its records, and its failure to employ reasonable procedures resulted in Plaintiff's report being inaccurate.

PARTIES AND JURISDICTION

5. Individual and representative Plaintiff Natalie Wood, is a resident of Anderson, South Carolina.

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

7. Defendant One Source Technology, LLC, d/b/a Asurint, provides consumer reports for employment purposes. Defendant sells background reports containing, *inter alia*, information about consumers' criminal backgrounds to prospective employers.

8. Defendant is a consumer reporting agency as contemplated by the FCRA, 15 U.S.C. § 1681a.

9. Defendant is regularly engaged in the business of assembling, evaluating, and disseminating information concerning consumers for the purpose of furnishing consumer reports to third parties.

10. Among other things, Defendant provides background checks to employers for their use in deciding whether to take adverse employment action, such as termination, failure to hire, and failure to promote.

11. Defendant is headquartered in Cleveland, Ohio, Cuyahoga County.

12. The Court has personal jurisdiction over Defendant. Defendant conducts background checks on individuals in this District, and delivers them to potential employers and other in this District. To assemble these reports, Defendant accesses, stores and reproduces court records and other public record from courts and other government entities in this District.

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

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

FACTUAL ALLEGATIONS RELATING TO PLAINTIFF

15. In January 2018, Plaintiff applied to work for the non-party Proper Polymers, via a staffing agency, non-party Staffmark. Plaintiff was preliminary hired and began work at Proper Polymers that same month.

16. On or around January 19, 2018, Defendant prepared a consumer report regarding Plaintiff and furnished the report to Staffmark for a fee. The report is attached hereto as Exhibit A.

17. The consumer report provided by Defendant to Staffmark was inaccurate and materially misleading. The report represented that Plaintiff has been convicted of larceny and burglary in South Carolina in 2003, but failed to mention that Plaintiff's convictions had been expunged in 2014 pursuant to the Youthful Offender Act, S.C. Code Ann. § 22-5-920.

18. The consumer report provided by Defendant to Staffmark was also inaccurate because it reported Plaintiff's expunged record twice. The report lists Plaintiff's expunged

record under her full name Natalie Elisa Wood, Ex. A at 1-3, and then lists the same records again under the heading “Clise Wood, Natalie (Alias Name).” *Id.* at 3-5. This reporting was incorrect because Plaintiff has never gone by the name Natalie Clise Wood, and because reporting the same charges twice created the false impression that Plaintiff had a more serious record than she actually did and/or that Plaintiff’s second record was under a false name. In actuality, she has no record because the charges have been expunged.

19. Upon receiving Defendant’s report, Proper Polymers and/or Staffmark summarily terminated Plaintiff’s employment. She showed up for her previously-scheduled shift, was prevented from punching in, and was immediately terminated.

20. Defendant does not obtain any records regarding expungements in South Carolina in the course of preparing consumer reports.

21. Further, Defendant’s report states that its “criminal records are updated daily.” Ex A at 1. This is clearly not the case, as Defendant’s reporting about Plaintiff was three years out of date.

22. Rather, Defendant accumulates data regarding individuals, and, once that data is in on of Defendant’s databases, it maintains that data indefinitely, even if that data is removed or expunged from the court records from which it was originally obtained.

23. Plaintiff’s report notes that the information reported came from the “National Criminal Information Bureau” (“NCIB”). Ex A. Despite this official-sounding name, the NCIB is simply an internal database maintained by Defendant which “provides results utilizing our proprietary national criminal database made up of aggregated criminal public record data from counties and courts across the country.”¹

¹ <https://my.asurint.com/brochure/gs/>, last accessed 9/18/18.

24. Defendant's report on Plaintiff contained records from Defendant's NCIB database which had been expunged from the sentencing court's electronic records. At the time of Plaintiff's report, the record had been expunged from the South Carolina courts' public websites. Defendant reported this information anyway, because it does not verify its NCIB database information with the court's current electronic records prior to issuing reports.

25. Defendant's FCRA violations injured Plaintiff by publishing derogatory and inaccurate information about her. Defendant's violation also defeated the purpose of the expungement itself, and caused her termination from employment.

26. Plaintiff disputed the inaccuracy in her report in a telephone call to Defendant on or about February 19, 2018. Defendant eventually issued a revised report excluding the conviction records, but it was too late to save Plaintiff's employment. The records of Defendant's actions leading up to the issuance of the revised report are attached as Exhibit B.

27. After Plaintiff disputed, the employee of Defendant who was assigned to the dispute attempted to find electronic records of Plaintiff's cases in South Carolina, and was unable to do so, making a note in Defendant's records that "[c]ases do not return on public access – cases should all be removed, expunged from data, and dispute must be closed out as overturned." Exhibit B at 2.

28. Defendant could have and should have checked South Carolina's electronic case records *prior* to issuing the initial report. If it had done so, it would have discovered that the records of Plaintiff's cases were no longer accessible, because they had been expunged. However, it did not check the records, and reported Plaintiff's cases without verifying them by checking South Carolina's electronic case records. Because Defendant did not take those steps, Plaintiff lost her job.

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

29. If Defendant had reasonable procedures to assure maximum possible accuracy, it could have determined that the information in Plaintiff's report was incorrect and outdated.

30. Defendant has also received disputes in connection with its reporting of South Carolina criminal records where the record had been expunged prior to the date of the report, so it was on notice that this was a problem with its practices.

31. Defendant's failure to ensure that it does not report records on individuals whose records were subsequently expunged is unreasonable. Defendant made an intentional choice to not review courts' electronic records before sending reports, reporting expunged charges without regard to the subsequent expungement.

32. Defendant has no procedure in place whatsoever to check criminal records it reports against publicly available data to find subsequent expungements. Instead, Defendant relies on old and outdated public records data.

33. Defendant could, and should, have a policy which requires it to verify that convictions are current before it reports them. Defendant was able to quickly and easily do exactly that, after Plaintiff disputed Defendant's inaccurate reporting. Defendant could and should have done that before erroneously reporting expunged charges to Plaintiff's employer.

34. However, Defendant chooses not to implement such a policy in order to avoid the time and expense that would have been associated with such a policy. Defendant's intentional and knowing decision to do so was financially motivated and was conducted with reckless disregard for the rights of consumers to have their reports fully and accurately reflect the status of their actual records.

35. Further, appropriate review of Plaintiff's report would have made clear that Defendant was reporting Plaintiff's record twice. Aside from the purported difference between Plaintiff's name and her 'alias' name, the records come from the same court, have the same file number, the same charges and the same dates associated with them. Instead, Defendant employed no procedures to eliminate these duplicates, making it appear to an untrained person that Plaintiff's criminal record was more substantial than it actually is, or that she had attempted to evade responsibility for her actions by using an alias.

GENERAL FACTS REGARDING DEFENDANT'S WILLFULNESS

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

- a. The FCRA was enacted in 1970; Defendant has had 46 years to become compliant;
- b. Defendant is a corporation with access to legal advice through its own general counsel's office and outside litigation counsel. Yet, there is no contemporaneous evidence that it determined that its conduct was lawful;
- c. Defendant knew or had reason to know that its conduct was inconsistent with FTC guidance, case law, and the plain language of the FCRA;
- d. Defendant voluntarily ran a risk of violating the law substantially greater than the risk associated with a reading that was merely careless; and
- e. Defendant could and should have attempted to verify Plaintiff's records online before reporting them; if it had done so, it would have found out about the expungement;

- f. Defendant could have and should have reviewed Plaintiff's report for duplicative information before providing it to her employer; if it had done so, it would have found and removed the duplicative charges;
- g. Defendant's violations of the FCRA were repeated and systematic.

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

CLASS ACTION ALLEGATIONS

38. Plaintiff brings Count I as a class action pursuant to Fed. R. Civ. P. 23 on behalf of the South Carolina Expungements Class, defined as:

All individuals on whom Defendant prepared consumer reports including information about a South Carolina criminal conviction where the conviction was expunged prior to the date on which the report was issued. The class begins on the date two years prior to the filing of this Complaint and ends on the date the class list is prepared.

39. Plaintiff brings Count II as a class action pursuant to Fed. R. Civ. P. 23 on behalf of the Duplicative Reporting Class, defined as:

All individuals on whom Defendant prepared consumer reports including information about a criminal conviction or charge where the conviction or charge appears on the report more than once. The class begins on the date two years prior to the filing of this Complaint and ends on the date the class list is prepared.

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

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

42. Typicality: Plaintiff's claims are typical of the members of the classes. It is typical for Defendant to produce consumer reports which fail to account for the fact that the convictions listed therein were the subject of an expungement. The FCRA violations suffered by Plaintiff are typical of those suffered by other class members, and Defendant treated Plaintiff consistently with other class members in accordance with its standard policies and practices.

43. Adequacy: Plaintiff will fairly and adequately protect the interests of the classes because she and her experienced counsel are free of any conflicts of interest and are prepared to vigorously litigate this action on behalf of the class.

44. Commonality: This case presents common questions of law and fact, including but not limited to:

- a. Whether Defendant violated the FCRA by failing to follow reasonable procedures to ensure maximum possible accuracy in reporting criminal convictions that were subsequently expunged and in reporting duplicative records;
- b. Whether Defendant's violations of the FCRA were willful; and
- c. The proper measure of damages.

45. Class certification is appropriate under Fed. R. Civ. P. 23(b)(3) because, *inter alia*, questions of law and fact common to the class predominate over any questions affecting only individual members of the class, and because a class action is superior to other available methods for the fair and efficient adjudication of this litigation. Defendant's conduct described

in this Complaint stems from common and uniform policies and practices, resulting in common violations of the FCRA. Members of the class do not have an interest in pursuing separate actions against Defendant, as the amount of each class member's individual claim is small compared to the expense and burden of individual prosecution. Class certification also will obviate the need for unduly duplicative litigation that might result in inconsistent judgments concerning Defendant's practices. Moreover, management of this action as a class action will not present any likely difficulties. In the interests of justice and judicial efficiency, it would be desirable to concentrate the litigation of all class members' claims in a single forum.

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

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

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

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

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

50. Defendant violated 15 U.S.C. § 1681e(b) by failing to establish or to follow reasonable procedures to assure maximum possible accuracy in the preparation of the consumer reports it furnished regarding Plaintiff. Specifically, Defendant:

- a. Misidentified Plaintiff as a convicted felon without noting that Plaintiff's conviction had been subsequently expunged;
- b. Failed to verify Plaintiff's record prior to completing her report and sending it to her employer; and,
- c. Relied on information that was at least three years old.

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

52. As a result of Defendant's conduct, Plaintiff and class members suffered actual damages including but not limited to: denial of employment, damage to reputation, embarrassment, humiliation and other mental and emotional distress.

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

COUNT II
15 U.S.C. § 1681e(b)
On behalf of Plaintiff and the Duplicative Reporting Class

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

55. Defendant violated 15 U.S.C. § 1681e(b) by failing to establish or to follow reasonable procedures to assure maximum possible accuracy in the preparation of the consumer

reports it furnished regarding Plaintiff. Specifically, Defendant failed to review Plaintiff's report to ensure that information did not appear more than once.

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

57. As a result of Defendant's conduct, Plaintiff and class members suffered actual damages including but not limited to: denial of employment, damage to reputation, embarrassment, humiliation and other mental and emotional distress.

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

JURY TRIAL DEMANDED

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

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, on behalf of herself and the class, seeks the following relief:

- a. Determining that this action may proceed as a class action under Rule 23;
- b. Designating Plaintiff as the class representative for the class;
- c. Designating Plaintiff's counsel as counsel for the class;
- d. Issuing proper notice to the class at Defendant's expense;
- e. Declaring that Defendant committed multiple, separate violations of the FCRA;
- f. Declaring that Defendant acted negligently, or willfully and in deliberate or reckless disregard of the rights of Plaintiff and the class under the FCRA;

- g. Awarding actual and/or statutory damages as provided by the FCRA;
- h. Awarding punitive damages;
- i. Awarding reasonable attorneys' fees and costs and expenses, as provided by the FCRA;
- j. Granting other and further relief, in law or equity, as this Court may deem appropriate and just.

Respectfully submitted,

Date: October 19,2018

s/ David A. Maxfield
David A. Maxfield, Fed ID No. 6293
Dave Maxfield, Attorney, LLC
P.O. Box 11865
Columbia, SC 29211
Tel: (803) 509-6800
Fax: (855) 299-1656

BERGER & MONTAGUE, P.C.
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Joseph C. Hashmall, MN Bar No. 392610*
43 S.E. Main Street, Suite 505
Minneapolis, MN 55414
Tel: (612) 594-5997
Fax: (612) 584-4470

**pro hac vice forthcoming*

Counsel for Plaintiff and the Putative Class

Exhibit A

Background Check Report



Search Information

Candidate: WOOD, NATALIE ELISA	Order ID: 30219424
SSN: XXX-XX-XXXX	Customer: Staffmark
DOB: █████XXXX	Order Date: 1/19/2018 4:15:28 PM
Alias Names: REID, NATALIE ELISA	
CLISE WOOD, NATALIE	
WOODS, NATALIE	
Cost Center: 1110	Completion Date: 1/22/2018 8:26:21 AM
Client Name: Proper	Package: 157

WOOD, NATALIE ELISA (Primary Name)

VeriFynd

NATALIE ELISA WOOD

Search Criteria

Search Name: NATALIE ELISA WOOD - VERIFIED
Date of Birth: █████XXXX - VERIFIED

VeriFynd Option

Setting: Modified Alias
Searched By: SSN

Social Security Administration SSN Verification

SSN: VALID (ISSUED)
Issue State: SC
Issue Dates: ██████████

Note: A validated SSN only indicates that the number is a valid SSN issued by the Social Security Administration. It does not verify that the SSN belongs to the candidate of the search.

USER SUBMITTED ADDRESSES FOR NATALIE ELISA WOOD

Name	Address
NATALIE ELISA WOOD █████XXXX	123 WINDFIELD HILL RD WILLIAMSTON, SC 29697

End of Section

National Criminal Information Bureau (Nationwide) Search Candidate: WOOD, NATALIE ELISA (Primary Name)

NCIB: Asurint's primary source data solution includes criminal information from the following: Felony and Misdemeanor courts, State Administrative Office of the Courts, State Department of Corrections, 50 State Sex Offender Registries and the District of Columbia, and criminal records from targeted single county search results. Criminal records are updated daily.

CRIMINAL REPORT					
SOUTH CAROLINA - Oconee	Offense(s): 1				
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">NATALIE ELISA WOOD</td> <td style="text-align: right;">DOB: █████XXXX</td> </tr> <tr> <td colspan="2">Address(es): 101 F MEADOWCREEK DRIVE, EASLEY, SC, 29640 - Home Address</td> </tr> </table>		NATALIE ELISA WOOD	DOB: █████XXXX	Address(es): 101 F MEADOWCREEK DRIVE, EASLEY, SC, 29640 - Home Address	
NATALIE ELISA WOOD	DOB: █████XXXX				
Address(es): 101 F MEADOWCREEK DRIVE, EASLEY, SC, 29640 - Home Address					
CASE #H224033 - OCONEE CIRCUIT & COUNTY					
CASE SUMMARY					

Case #	File Date	Court Type	Case Disposition	Disposition Date
H224033	10/30/2002	COMBINED	DISPOSED	n/a
Offense(s)	Offense Date	Level	Offense Disposition	Disposition Date
LARCENY / PETIT OR SIMPLE LARCENY	n/a	MISDEMEANOR	PLED GUILTY	03/24/2003

CASE DETAILS

Supplemental Information:
Originating Agency: GENERAL SESSIONS

OFFENSE - LARCENY / PETIT OR SIMPLE LARCENY (MISDEMEANOR)

Supplemental Information
Code: 0480 **Date Arrested:** 10/12/2002

Process Information
Trial: **Offense:** LARCENY / PETIT OR SIMPLE LARCENY - MISDEMEANOR **Disposition:** PLED GUILTY

CRIMINAL REPORT

SOUTH CAROLINA - Oconee

Offense(s): 1

NATALIE ELISA WOOD **DOB:** [REDACTED] XXXX
Address(es): 101 F MEADOWCREEK DRIVE, EASLEY, SC, 29640 - Home Address

CASE #H224034 - OCONEE CIRCUIT & COUNTY

CASE SUMMARY

Case #	File Date	Court Type	Case Disposition	Disposition Date
H224034	10/30/2002	COMBINED	DISPOSED	n/a
Offense(s)	Offense Date	Level	Offense Disposition	Disposition Date
BURGLARY / BURGLARY (NON - VIOLENT) (AFTER JUNE 20, 1985) - SECOND DEGREE	n/a	FELONY	PLED GUILTY	03/24/2003

CASE DETAILS

Supplemental Information:
Originating Agency: GENERAL SESSIONS

OFFENSE - BURGLARY / BURGLARY (NON - VIOLENT) (AFTER JUNE 20, 1985) - SECOND DEGREE (FELONY)

Supplemental Information
Code: 0080 **Date Arrested:** 10/12/2002

Process Information
Trial: **Offense:** BURGLARY / BURGLARY (NON - VIOLENT) (AFTER JUNE 20, 1985) - SECOND DEGREE - FELONY **Disposition:** PLED GUILTY

CRIMINAL REPORT

SOUTH CAROLINA - Oconee

Offense(s): 1

NATALIE ELISA WOOD **DOB:** [REDACTED] XXXX
Address(es): 101 F MEADOWCREEK DRIVE, EASLEY, SC, 29640 - Home Address

CASE #H224035 - OCONEE CIRCUIT & COUNTY

CASE SUMMARY

Case #	File Date	Court Type	Case Disposition	Disposition Date
H224035	10/30/2002	COMBINED	DISPOSED	n/a
Offense(s)	Offense Date	Level	Offense Disposition	Disposition Date
LARCENY / GRAND LARCENY, VALUE \$5,000 OR MORE	n/a	FELONY	PLED GUILTY	03/24/2003

CASE DETAILS

Supplemental Information:
Originating Agency: GENERAL SESSIONS

OFFENSE - LARCENY / GRAND LARCENY, VALUE \$5,000 OR MORE (FELONY)

Supplemental Information	
Code:	0479 Date Arrested: 10/12/2002
Process Information	
Trial:	Offense: LARCENY / GRAND LARCENY, VALUE \$5,000 OR MORE - FELONY Disposition: PLED GUILTY

CRIMINAL REPORT				
SOUTH CAROLINA - Oconee				Offense(s): 1
NATALIE ELISA WOOD				DOB: █████ XXXX
Address(es): 101 F MEADOWCREEK DRIVE, EASLEY, SC, 29640 - Home Address				
CASE #H224036 - OCONEE CIRCUIT & COUNTY				
CASE SUMMARY				
Case #	File Date	Court Type	Case Disposition	Disposition Date
H224036	10/30/2002	COMBINED	DISPOSED	n/a
Offense(s)	Offense Date	Level	Offense Disposition	Disposition Date
BURGLARY / BURGLARY (NON - VIOLENT) (AFTER JUNE 20, 1985) - SECOND DEGREE	n/a	FELONY	PLED GUILTY	03/24/2003
CASE DETAILS				
Supplemental Information:				
Originating Agency: GENERAL SESSIONS				
OFFENSE - BURGLARY / BURGLARY (NON - VIOLENT) (AFTER JUNE 20, 1985) - SECOND DEGREE (FELONY)				
Supplemental Information				
Code: 0080 Date Arrested: 10/12/2002				
Process Information				
Trial:	Offense: BURGLARY / BURGLARY (NON - VIOLENT) (AFTER JUNE 20, 1985) - SECOND DEGREE - FELONY Disposition: PLED GUILTY			

End of Section

REID, NATALIE ELISA (Alias Name)

National Criminal Information Bureau (Nationwide)
Search Candidate: REID, NATALIE ELISA (Alias Name)

NCIB: Asurint's primary source data solution includes criminal information from the following: Felony and Misdemeanor courts, State Administrative Office of the Courts, State Department of Corrections, 50 State Sex Offender Registries and the District of Columbia, and criminal records from targeted single county search results. Criminal records are updated daily.

No Reportable Records Found

End of Section

CLISE WOOD, NATALIE (Alias Name)

National Criminal Information Bureau (Nationwide)
Search Candidate: CLISE WOOD, NATALIE (Alias Name)

NCIB: Asurint's primary source data solution includes criminal information from the following: Felony and Misdemeanor courts, State Administrative Office of the Courts, State Department of Corrections, 50 State Sex Offender Registries and the District of Columbia, and criminal records from targeted single county search results. Criminal records are updated daily.

CRIMINAL REPORT	
SOUTH CAROLINA - Oconee	Offense(s): 1

NATALIE ELISA WOOD		DOB: █████ XXXX		
Address(es): 101 F MEADOWCREEK DRIVE, EASLEY, SC, 29640 - Home Address				
CASE #H224033 - OCONEE CIRCUIT & COUNTY				
CASE SUMMARY				
Case #	File Date	Court Type	Case Disposition	Disposition Date
H224033	10/30/2002	COMBINED	DISPOSED	n/a
Offense(s)	Offense Date	Level	Offense Disposition	Disposition Date
LARCENY / PETIT OR SIMPLE LARCENY	n/a	MISDEMEANOR	PLED GUILTY	03/24/2003
CASE DETAILS				
Supplemental Information:				
Originating Agency: GENERAL SESSIONS				
OFFENSE - LARCENY / PETIT OR SIMPLE LARCENY (MISDEMEANOR)				
Supplemental Information				
Code: 0480 Date Arrested: 10/12/2002				
Process Information				
Trial: Offense: LARCENY / PETIT OR SIMPLE LARCENY - MISDEMEANOR Disposition: PLED GUILTY				

CRIMINAL REPORT		Offense(s): 1		
SOUTH CAROLINA - Oconee				
NATALIE ELISA WOOD		DOB: █████ XXXX		
Address(es): 101 F MEADOWCREEK DRIVE, EASLEY, SC, 29640 - Home Address				
CASE #H224034 - OCONEE CIRCUIT & COUNTY				
CASE SUMMARY				
Case #	File Date	Court Type	Case Disposition	Disposition Date
H224034	10/30/2002	COMBINED	DISPOSED	n/a
Offense(s)	Offense Date	Level	Offense Disposition	Disposition Date
BURGLARY / BURGLARY (NON - VIOLENT) (AFTER JUNE 20, 1985) - SECOND DEGREE	n/a	FELONY	PLED GUILTY	03/24/2003
CASE DETAILS				
Supplemental Information:				
Originating Agency: GENERAL SESSIONS				
OFFENSE - BURGLARY / BURGLARY (NON - VIOLENT) (AFTER JUNE 20, 1985) - SECOND DEGREE (FELONY)				
Supplemental Information				
Code: 0080 Date Arrested: 10/12/2002				
Process Information				
Trial: Offense: BURGLARY / BURGLARY (NON - VIOLENT) (AFTER JUNE 20, 1985) - SECOND DEGREE - FELONY Disposition: PLED GUILTY				

CRIMINAL REPORT		Offense(s): 1		
SOUTH CAROLINA - Oconee				
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H224035	10/30/2002	COMBINED	DISPOSED	n/a
Offense(s)	Offense Date	Level	Offense Disposition	Disposition Date
LARCENY / GRAND LARCENY, VALUE \$5,000 OR MORE	n/a	FELONY	PLED GUILTY	03/24/2003
CASE DETAILS				

Supplemental Information:	
Originating Agency: GENERAL SESSIONS	
OFFENSE - LARCENY / GRAND LARCENY, VALUE \$5,000 OR MORE (FELONY)	
Supplemental Information	
Code: 0479 Date Arrested: 10/12/2002	
Process Information	
Trial:	Offense: LARCENY / GRAND LARCENY, VALUE \$5,000 OR MORE - FELONY Disposition: PLED GUILTY

CRIMINAL REPORT				
SOUTH CAROLINA - Oconee				Offense(s): 1
NATALIE ELISA WOOD				DOB: █████ XXXX
Address(es): 101 F MEADOWCREEK DRIVE, EASLEY, SC, 29640 - Home Address				
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Offense(s)	Offense Date	Level	Offense Disposition	Disposition Date
BURGLARY / BURGLARY (NON - VIOLENT) (AFTER JUNE 20, 1985) - SECOND DEGREE	n/a	FELONY	PLED GUILTY	03/24/2003
CASE DETAILS				
Supplemental Information:				
Originating Agency: GENERAL SESSIONS				
OFFENSE - BURGLARY / BURGLARY (NON - VIOLENT) (AFTER JUNE 20, 1985) - SECOND DEGREE (FELONY)				
Supplemental Information				
Code: 0080 Date Arrested: 10/12/2002				
Process Information				
Trial:	Offense: BURGLARY / BURGLARY (NON - VIOLENT) (AFTER JUNE 20, 1985) - SECOND DEGREE - FELONY Disposition: PLED GUILTY			

End of Section

WOODS, NATALIE (Alias Name)

National Criminal Information Bureau (Nationwide)
Search Candidate: WOODS, NATALIE (Alias Name)

NCIB: Asurint's primary source data solution includes criminal information from the following: Felony and Misdemeanor courts, State Administrative Office of the Courts, State Department of Corrections, 50 State Sex Offender Registries and the District of Columbia, and criminal records from targeted single county search results. Criminal records are updated daily.

No Reportable Records Found

End of Section

End of Report 1 of 1

Asurint · 800.906.1674 · support@asurint.com

Para información en español, visite www.consumerfinance.gov/learnmore o escribe al Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

A Summary of Your Rights Under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under the FCRA. **For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.**

- **You must be told if information in your file has been used against you.** Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment – or to take another adverse action against you – must tell you, and must give you the name, address, and phone number of the agency that provided the information.
- **You have the right to know what is in your file.** You may request and obtain all the information about you in the files of a consumer reporting agency (your “file disclosure”). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:
 - a person has taken adverse action against you because of information in your credit report;
 - you are the victim of identity theft and place a fraud alert in your file;
 - your file contains inaccurate information as a result of fraud;
 - you are on public assistance;
 - you are unemployed but expect to apply for employment within 60 days.

In addition, all consumers are entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty consumer reporting agencies. See www.consumerfinance.gov/learnmore for additional information.

- **You have the right to ask for a credit score.** Credit scores are numerical summaries of your credit-worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create scores or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.
- **You have the right to dispute incomplete or inaccurate information.** If you identify information in your file that is incomplete or inaccurate, and report it to the consumer reporting agency, the agency must investigate unless your dispute is frivolous. See www.consumerfinance.gov/learnmore for an explanation of dispute procedures.
- **Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.** Inaccurate, incomplete or unverifiable information must be removed or corrected, usually within 30 days. However, a consumer reporting agency may continue to report information it has verified as accurate.
- **Consumer reporting agencies may not report outdated negative information.** In most cases, a consumer reporting agency may not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.
- **Access to your file is limited.** A consumer reporting agency may provide information about you only to people with a valid need -- usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifies those with a valid need for access.
- **You must give your consent for reports to be provided to employers.** A consumer reporting agency may not give out information about you to your employer, or a potential employer, without your written consent given to the employer. Written consent generally is not required in the trucking industry. For more information, go to www.consumerfinance.gov/learnmore.
- **You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.** Unsolicited “prescreened” offers for credit and insurance must include a toll-free phone number you can call if you choose to remove your name and address from the lists these offers are based on. You may opt out with the nationwide credit bureaus at 1-888-5-OPTOUT (1-888-567-8688).
- **You may seek damages from violators.** If a consumer reporting agency, or, in some cases, a user of consumer reports or a furnisher of information to a consumer reporting agency violates the FCRA, you may be able to sue in state or federal court.
- **Identity theft victims and active duty military personnel have additional rights.** For more information, visit www.consumerfinance.gov/learnmore.

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

TYPE OF BUSINESS:	CONTACT:
<p>1.a. Banks, savings associations, and credit unions with total assets of over \$10 billion and their affiliates</p> <p>b. Such affiliates that are not banks, savings associations, or credit unions also should list, in addition to the CFPB:</p>	<p>a. Consumer Financial Protection Bureau 1700 G. Street N.W. Washington, DC 20552</p> <p>b. Federal Trade Commission: Consumer Response Center – FCRA Washington, DC 20580 (877) 382-4357</p>
<p>2. To the extent not included in item 1 above:</p> <p>a. National banks, federal savings associations, and federal branches and federal agencies of foreign banks</p> <p>b. State member banks, branches and agencies of foreign banks (other than federal branches, federal agencies, and Insured State Branches of Foreign Banks), commercial lending companies owned or controlled by foreign banks, and organizations operating under section 25 or 25A of the Federal Reserve Act</p> <p>c. Nonmember Insured Banks, Insured State Branches of Foreign Banks, and insured state savings associations</p> <p>d. Federal Credit Unions</p>	<p>a. Office of the Comptroller of the Currency Customer Assistance Group 1301 McKinney Street, Suite 3450 Houston, TX 77010-9050</p> <p>b. Federal Reserve Consumer Help Center P.O. Box. 1200 Minneapolis, MN 55480</p> <p>c. FDIC Consumer Response Center 1100 Walnut Street, Box #11 Kansas City, MO 64106</p> <p>d. National Credit Union Administration Office of Consumer Protection (OCP) Division of Consumer Compliance and Outreach (DCCO) 1775 Duke Street Alexandria, VA 22314</p>
<p>3. Air carriers</p>	<p>Asst. General Counsel for Aviation Enforcement & Proceedings Aviation Consumer Protection Division Department of Transportation 1200 New Jersey Avenue, S.E. Washington, DC 20423</p>
<p>4. Creditors Subject to the Surface Transportation Board</p>	<p>Office of Proceedings, Surface Transportation Board Department of Transportation 395 E Street, S.W. Washington, DC 20423</p>
<p>5. Creditors Subject to the Packers and Stockyards Act, 1921</p>	<p>Nearest Packers and Stockyards Administration area supervisor</p>
<p>6. Small Business Investment Companies</p>	<p>Associate Deputy Administrator for Capital Access United States Small Business Administration 409 Third Street, S.W., 8th Floor Washington, DC 20549</p>
<p>7. Brokers and Dealers</p>	<p>Securities and Exchange Commission 100 F Street, N.E. Washington, DC 20549</p>
<p>8. Federal Land Banks, Federal Lank Bank Associations, Federal Intermediate Credit Banks, and Production Credit Associations</p>	<p>Farm Credit Administration 1501 Farm Credit Drive McLean, VA 22102-5090</p>
<p>9. Retailers, Finance Companies, and All Other Creditors Not Listed Above</p>	<p>FTC Regional Office for region in which the creditor operates or Federal Trade Commission: Consumer Response Center – FCRA Washington, DC 20580 (877) 382-4357</p>

Exhibit B



Search...

Search

Help & Training

Compliance

- Home
- Chatter
- Accounts
- Contacts
- Cases
- Reports
- Dashboards
- Asurint mapCentre
- New KAM Interactions

Case Number 00310725 Created Date 2/5/2018 12:19 PM

Status Closed

Wood, Natalie

Priority Medium

expunged case- larceny; wants record cleared

Case Owner Victoria Joseph

Order ID 30219424

- Feed
- Details

[Open Activities \[0\]](#) |
 [Activity History \[5\]](#) |
 [Record Resolutions \[4\]](#) |
 [Case History \[5+\]](#) |
 [Case Comments \[4\]](#) |
 [Attachments \[4\]](#) |
 [Emails \[4\]](#) |
 [Order Quality Audits \[0\]](#) |
 [Live Chat Transcripts \[0\]](#)

Case Detail

- Edit
- Close Case
- Clone

Case Information

Case Owner	[Redacted]	Status	Closed
Case Number	00310725 [View Hierarchy]	Priority	Medium
Contact Name	[Redacted]	Contact Phone	[Redacted]
Account Name	Staffmark	Contact Email	[Redacted]
Type	Problem	Case Origin	Inbound Call
Subtype	Compliance	Order ID	30219424
Product Type		Parent Case	
Case Reason	FCRA Dispute	Date/Time Closed	2/19/2018 11:08 AM
Date/Time Opened	2/5/2018 12:19 PM	Last Modified By	[Redacted] 2/23/2018 9:49 AM
Created By	[Redacted], 2/5/2018 12:19 PM		
Subject	Wood, Natalie		
Description	expunged case- larceny; wants record cleared		

Applicant Information

Applicant Name	Natalie Wood	Applicant Street	525 Shirley Store Rd
Applicant City	Anderson	Applicant State	SC
Applicant Postal Code	29621	Applicant Phone	[Redacted]
Applicant Email	[Redacted]	Applicant Last Four of SSN	[Redacted]
Applicant Consents to Electronic Receipt	<input checked="" type="checkbox"/>	Applicant Filed Documentation	<input type="checkbox"/>

Compliance Information

Order Completion Date	1/22/2018	Resolution Letter Sent	
Request Received	2/5/2018	Resolution Letter Returned	
Request Deadline	3/2/2018	Resolution Email Sent	2/19/2018 11:08 AM
Resolution ETA	3/7/2018		

- Edit
- Close Case
- Clone

Open Activities

- New Task
- New Event

[Open Activities Help](#)

No records to display

Activity History

- Log a Call
- Mail Merge
- Send an Email
- [View All](#)

[Activity History Help](#)

Action	Subject	Task	Due Date	Assigned To	Last Modified Date/Time
Edit Del	30219424 Wood, Natalie	<input checked="" type="checkbox"/>	3/10/2018	[Redacted]	3/20/2018 12:29 PM

Edit Del	Email: FCRA Dispute Complete - Order 30219424 - Natalie Wood - Overturned [ref: 00D708Suh, 5000g1q396W:ref]	✓	2/19/2018		2/23/2018 9:49 AM
Edit Del	Email: Dispute - Order 30219424 - Natalie Wood [ref: 00D708Suh, 5000g1q396W:ref]	✓	2/12/2018		2/23/2018 9:49 AM
Edit Del	Email: FCRA Dispute Notification- Order 30219424 - Natalie Wood [ref: 00D708Suh, 5000g1q396W:ref]	✓	2/8/2018		2/23/2018 9:49 AM
Edit Del	Expungement Requests - Wood, Natalie	✓			3/20/2018 12:22 PM

Record Resolutions Record Resolutions Help

[New Record Resolution](#)

Action	Record Resolution Number
Edit	RECRES-0017728
Edit	RECRES-0017729
Edit	RECRES-0017730
Edit	RECRES-0017731

Case History Case History Help

Date	User	Connection	Action
2/19/2018 11:08 AM			Changed Status from Waiting on Activity to Closed . Closed.
2/19/2018 11:01 AM			Changed Status from In Progress to Waiting on Activity .
2/15/2018 4:32 PM			Changed Status from Open to In Progress .
2/15/2018 4:32 PM			Changed Case Owner from Compliance Queue to

Show more » | Go to list »

Case Comments Case Comments Help

[New](#)

Action	Public	Comment
Make Public	<input type="checkbox"/>	Created By: (2/19/2018 11:06 AM) Created data request. Removed from report. Closing out as overturned. Emailed reinvestigation letter to nataliewood83@outlook.com
Make Public	<input type="checkbox"/>	Created By: (2/15/2018 2:30 PM) Cases do not return on public access- cases should all be removed, expunged from data, and dispute must be closed out as overturned.
Make Public	<input type="checkbox"/>	Created By: (2/12/2018 12:58 PM) left voicemail per request of client relations.
Make Public	<input type="checkbox"/>	Created By: (2/8/2018 10:40 AM) also on order 4733898.

Attachments Attachments Help

[Attach File](#) [View All](#)

Action	File Name	Size	Last Modified	Created By
Edit View Del	Asurint Completed Dispute Order 30219424.msg	423KB	2/19/2018 11:08 AM	
Edit View Del	ReportsViewCORRECTED.pdf	326KB	2/19/2018 11:03 AM	
Edit View Del	Asurint Reinvestigation Letter - Revised - 00310725 - 20180219160141.doc	261KB	2/19/2018 11:03 AM	
Edit View Del	ReportsViewWood, Natalie30219424.pdf	395KB	2/8/2018 10:32 AM	

Emails Emails Help

[Send an Email](#)

Action	Status	Subject	Email Address	Message Date
Reply To All Del	Sent	FCRA Dispute Complete - Order 30219424 - Natalie Wood - Overturned [ref:...] Hello, Natalie Wood recently contact Asurint to dispute information includ...	belinda.holley@staffmark.com; backgroundscreening@staffmark.com	2/19/2018 10:56 AM
Reply To All Del	Read	RE: Dispute - Order 30219424 - Natalie Wood [ref: 00D708Suh, 5000g1q396W:...] Hi team, We have contacted the candidate. Thank you, Legal & Compliance Te...	compliance@asurint.com	2/12/2018 2:01 PM
Reply To All Del	Sent	Dispute - Order 30219424 - Natalie Wood [ref: 00D708Suh, 5000g1q396W:ref] Hello Team, Please reach out to applicant Natalie Wood, for which she is r...	compliance@asurint.com	2/12/2018 10:52 AM

Reply To All Del Sent	<p>FCRA Dispute Notification- Order 30219424 - Natalie Wood ref: 00D708Suh.... <i>Hello, Natalie Wood recently contacted Asurint to dispute information incl...</i></p>	<p>belinda.holley@staffmark.com; backgroundscreening@ataffmark.com</p>	<p>2/8/2018 10:37 AM</p>
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Order Quality Audits [New Order Quality Audit](#) [Order Quality Audits Help](#)

No records to display

Live Chat Transcripts

No records to display

^ Back To Top

Always show me more records per related list

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ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Asurint Named in Lawsuit Over Allegedly Inaccurate Background Check](#)
