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15 **IN THE UNITED STATES DISTRICT COURT**  
16 **IN AND FOR THE EASTERN DISTRICT OF WASHINGTON**

17 **CARL PARKS,**

18 Plaintiff,

19 v.

20 **EQUIFAX INFORMATION**  
21 **SERVICES, LLC, a Georgia Limited**  
22 **Liability Company,**

23 Defendant.

NO.

**PLAINTIFF’S COMPLAINT FOR**  
**DAMAGES FOR VIOLATIONS**  
**OF THE FEDERAL FAIR**  
**CREDIT REPORTING ACT,**  
***INTER ALIA***

24 COMES NOW, Plaintiff, Carl Parks, by and through his attorneys,  
25 ROBERT MITCHELL and SARAELLEN HUTCHISON, and complains against  
26 the Defendant as follows:

**I. STATEMENT OF THE CASE**

1.1 Equifax mailed Mr. Parks hundreds of pages of documents alleging that he is financially responsible for over a half million dollars of other consumers' debts.<sup>1</sup>

1.2 Equifax mailed Mr. Parks hundreds of pages of documents *verifying* that Mr. Parks is financially responsible for bankruptcies, court judgments, past-due credit accounts, charged off debts, collection accounts, and credit accounts, amounting to over **\$510,000.00**.

1.3 Equifax's documents were all addressed to "Carl Parks," at *his* address, however, *none* of the bankruptcies, court judgments, past-due credit accounts, charged off debts, collection accounts, or credit accounts belong to Mr. Parks.

1.4 Equifax then mailed Mr. Parks a confusing letter that caused Mr. Parks even more concern.

1.5 After receiving the erroneous documents and Defendant's confusing letter, Mr. Parks mailed Equifax a letter requesting confirmation that these other consumers' accounts are not appearing on *his* personal credit report, and he also

<sup>1</sup> These documents are attached as **Exhibits 1 – 33**. All Exhibits have been heavily redacted to protect the identity and private financial information belonging to other consumers.

1 requested that Equifax simply mail him a current credit report so that Mr. Parks  
2 could verify that the accounts were not appearing on *his* personal credit report.

3  
4 1.6 Equifax did not respond, and has failed or refused to provide Mr.  
5 Parks with *any* further information.

6  
7 1.7 Because of the actions and inactions of Equifax, Mr. Parks has been  
8 left to worry for months about whether he will actually be held liable for over a  
9 half million dollars of other consumers' debts.

10  
11 1.8 He has constantly worried about the damage this has caused to his  
12 credit worthiness and his reputation.

13  
14 1.9 Mr. Parks has spent the last seven months living in a state of panic  
15 that Equifax's failure to correct its information about Mr. Parks will result in  
16 creditors, collectors, and courts taking action against him or his assets.

17  
18 **II. PARTIES**

19 2.1 Plaintiff, Carl Parks, (hereinafter "Plaintiff") resides in the city of  
20 Sprague, Stevens County, Washington.

21  
22 2.2 Defendant, EQUIFAX INFORMATION SERVICES, LLC  
23 ("Equifax" or "Defendant") is a "credit reporting agency" as defined by the  
24 FCRA, 15 U.S.C. §1681a(f).

1 2.3 Equifax is a Georgia limited liability company doing business in  
2 Washington State pursuant to UBI number 602126257.

3  
4 2.4 Defendant is regularly engaged in the business of assembling,  
5 evaluating, and disbursing information concerning consumers for the purpose of  
6 furnishing consumer reports, as defined in 15 U.S.C. § 1681(d), to third parties.

7  
8 2.5 Defendant disburses such consumer reports to third parties under  
9 contract for monetary compensation.

10  
11 2.6 Defendant falsely and inaccurately reported that Plaintiff had many  
12 accounts that do not belong to Plaintiff.

13  
14 2.7 On information and belief, the false information reported by  
15 Defendant belongs to over 30 other consumers, and not to Plaintiff.

16  
17 2.8 Defendant also disclosed the credit reports and personal financial  
18 credit information of approximately 16 other consumers to Plaintiff in response  
19 to a dispute sent to Equifax on one of Plaintiff's accounts.

20  
21 2.9 Defendant has failed or refused to provide Plaintiff with his own  
22 credit report.

23  
24 2.10 Plaintiff is therefore a "consumer" as defined by the FCRA, 15  
25 U.S.C. §1681a(c), and Plaintiff acted as a "consumer" at all times relevant to this  
26 litigation.

1  
2  
3 **III. JURISDICTION AND VENUE**

4 3.1 Jurisdiction and Venue in the United States District Court, Eastern  
5 District of Washington, are appropriate where this dispute predominantly  
6 involves issues of federal law, and where all acts at issue and described herein  
7 occurred in this district, and where the injury to Plaintiff occurred in this district,  
8 and where Plaintiff is a resident of this district, and where the Defendant  
9 conducts substantial business in this district. (38 U.S.C. § 4323(b); 28 U.S.C.  
10 §1331; 28 U.S.C. §1332; 28 U.S.C. §1391(b)).  
11

12 3.2 Defendant is liable unto Plaintiff pursuant to the provisions of the  
13 Fair Credit Reporting Act (FCRA), 15 U.S.C. §§ 1681, et seq., as well as other  
14 applicable federal and state laws. Defendant is also liable unto Plaintiff pursuant  
15 to the laws of the State of Washington, which claims may be brought under the  
16 Supplemental Jurisdiction of this Court. 28 U.S.C. 1367, et seq.  
17  
18

19 **IV. FACTS**

20 4.1 Plaintiff wanted to know what information was appearing on his  
21 credit report so that he could face the truth and possibly do something about it.  
22  
23  
24  
25

1 4.2 Plaintiff, like many unsophisticated consumers, signed up with a  
2 credit repair organization to help him dispute inaccurate information, because he  
3 felt he needed assistance.  
4

5 4.3 The credit repair organization mailed a dispute to an account on  
6 Plaintiff's credit report to Defendant.  
7

8 4.4 Plaintiff retained a copy of this dispute.

9 4.5 The dispute contained Plaintiff's identifying information and the  
10 disputed account so that Equifax could respond to Plaintiff and investigate the  
11 disputed account.  
12

13 4.6 On information and belief, Defendant received this dispute.

14 4.7 Instead of investigating Plaintiff's dispute, Defendant did something  
15 highly unusual and completely illegal.  
16

17 4.8 Defendant responded to Plaintiff's dispute by mailing Plaintiff  
18 hundreds of pages of documents alleging that Defendant contacted courts,  
19 collection agencies, and creditors and "verified" that Plaintiff is financially  
20 responsible for **bankruptcies, judgments, collections, charged off** accounts,  
21 **past due** accounts, and other credit accounts, belonging to over **30** other  
22 consumers, and totaling over **\$510,000.00** in debt.  
23

24 4.9 These false *verification* letters were addressed to Plaintiff.  
25

1 4.10 However, these accounts, judgments, bankruptcies, collections and  
2 credit accounts do not belong to Plaintiff – they belong to over **30** other  
3 individual consumers whom Plaintiff has never even met.  
4

5 4.11 To be certain, Plaintiff does not owe over a half million dollars in  
6 debt, he did not file the bankruptcies as alleged, and the judgments were not  
7 issued against him.  
8

9 4.12 In fact, Plaintiff had nothing whatsoever to do with the bankruptcies.

10 4.13 Plaintiff had nothing whatsoever to do with the judgments.

11 4.14 Plaintiff had nothing whatsoever to do with the charged off  
12 accounts.  
13

14 4.15 Plaintiff had nothing whatsoever to do with the collection accounts.

15 4.16 Plaintiff had nothing whatsoever to do with the past-due credit  
16 accounts.  
17

18 4.17 Plaintiff had nothing whatsoever to do with the current credit  
19 accounts.  
20

21 4.18 The credit information simply does not belong to Plaintiff.

22 4.19 Given the above, Plaintiff believes and therefore avers that  
23 Defendant failed to investigate Plaintiff's dispute.  
24

1 4.20 In fact, Defendant did not even mail Plaintiff a copy of *his own*  
2 credit report.

3  
4 4.21 Instead, Defendant mailed Plaintiff **EQUIFAX CREDIT FILE:**  
5 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*8835**, stating in pertinent part:

6 Dear **CARL ANDREW PARKS**: Below are the results  
7 of your reinvestigation request and, as applicable, any  
8 revisions to your credit file...**We have researched the**  
9 **collection account. Account # \*\*7620 The results are:**  
10 **We verified that this item belongs to you.** If you have  
11 additional questions about this item please contact:  
12 Health Services Asset, 2201 Lind Ave SW Ste 300,  
13 Management, Renton WA 98057-3375...”<sup>2</sup>

14 4.22 The document alleges that Plaintiff owes **\$115**.

15 4.23 The document also alleges that Equifax “verified” that Plaintiff is  
16 responsible for a **Capital One Bank USA Na** account number “\*\*\*\*\***8780\***”  
17 that was allegedly “**charged off**.”

18 4.24 The document alleges that Plaintiff owes **\$373**.

19 4.25 However, these accounts do not belong to Plaintiff.

20 4.26 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
21 with creditors and/or collection agencies and “verified” that Plaintiff is  
22 responsible for the debt(s).  
23

24  
25 \_\_\_\_\_  
26 <sup>2</sup> **Exhibit 1.**



1 4.27 Equifax’s assertion that Plaintiff is financially responsible for the  
2 above debt(s) is patently false.

3  
4 4.28 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
5 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*0247**, stating in pertinent part:

6 Dear **CARL ANDREW PARKS**: Below are the results  
7 of your reinvestigation request and, as applicable, any  
8 revisions to your credit file...**We have researched the**  
9 **collection account. Account # \*\*\*\*\*0897 The**  
10 **results are: We verified that this item belongs to you.**  
11 If you have additional questions about this item please  
12 contact: **Procollect Services Inc...**<sup>3</sup>

13 4.29 The document alleges that Plaintiff owes **\$1,362**.

14 4.30 The document also alleges:

15 **We have researched the collection account. Account**  
16 **#\*\*\*\*\*0896 The results are: We verified that**  
17 **this item belongs to you. If you have additional**  
18 **questions about this item please contact: Procollect**  
19 **Services Inc...**<sup>4</sup>

20 4.31 The document alleges that Plaintiff owes **\$1,997**.

21 4.32 The documents also alleges:

22 **We have researched the collection account. Account #**  
23 **\*\*\*\*\*0895 The results are: We verified that this**  
24 **item belongs to you. If you have additional questions**

25 <sup>3</sup> Exhibit 2.

26 <sup>4</sup> Exhibit 2.

1 about this item please contact: **Procollect Services**  
2 **Inc...**<sup>5</sup>

3 4.33 The document also alleges that Plaintiff owes **\$2,057**.

4 4.34 The document also alleges:

5  
6 **We have researched the collection account. Account #**  
7 **\*\*\*\* The results are:** We verified that this item belongs  
8 to you. If you have additional questions about this item  
please contact: **Yakima Adjustment Service...**<sup>6</sup>

9 4.35 The document also alleges:

10  
11 **We have researched the collection account. Account #**  
12 **\*\*\*1283 The results are:** We verified that this item  
13 belongs to you. If you have additional questions about  
14 this item please contact: **Puget Sound Collections,**  
**IN...**<sup>7</sup>

15 4.36 The document also alleges that Plaintiff owes **\$563**.

16 4.37 The document also alleges in pertinent part:

17  
18 **We have researched the collection account. Account #**  
19 **\*\*\*2553 The results are:** We verified that this item  
20 belongs to you. If you have additional questions about  
this item please contact: **Evergreen Financial**  
**Servic...**<sup>8</sup>

21 4.38 The document alleges that Plaintiff owes **\$516**.

22 4.39 However, these accounts do not belong to Plaintiff.

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24 <sup>5</sup> Exhibit 2.  
25 <sup>6</sup> Exhibit 2.  
<sup>7</sup> Exhibit 2.  
26 <sup>8</sup> Exhibit 2.

1 4.40 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
2 with creditors and/or collection agencies and “verified” that Plaintiff is  
3 responsible for the debt(s).  
4

5 4.41 Equifax’s assertion that Plaintiff is financially responsible for the  
6 debt(s) is patently false.  
7

8 4.42 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
9 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*0693**, stating in pertinent part:  
10

Dear CARL ANDREW PARKS: Below are the results of  
11 your reinvestigation request and, as applicable, any  
12 revisions to your credit file... **We have researched the**  
13 **collection account. Account # \*\*\*\*\*8559 The**  
14 **results are:** We verified that this item belongs to you. If  
15 you have additional questions about this item please  
16 contact: Automated Accounts Inc...”<sup>9</sup>

16 4.43 The document alleges that Plaintiff owes **\$5,581**.

17 4.44 The collection account does not belong to Plaintiff, Carl Andrew  
18 Parks.  
19

20 4.45 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
21 with the collection agency and “verified” that Plaintiff is responsible for the debt.  
22

23 4.46 Equifax’s assertion that Plaintiff is financially responsible for the  
24 debt is patently false.  
25

25 <sup>9</sup> Exhibit 3.

1 4.47 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
2 **MARCH 9, 2015, CONFIRMATION # \*\*\*\*\*1112,** stating in pertinent part:  
3

4 Dear CARL ANDREW PARKS: Below are the results of  
5 your reinvestigation request and, as applicable, any  
6 revisions to your credit file...**We have researched the**  
7 **collection account. Account # \*\*\*\*\*77N1 The results**  
8 **are:** The explanation previously attached to this account  
9 has been deleted. . If you have additional questions  
10 about this item please contact: TRI-County Collection  
11 Dept...<sup>10</sup>

12 4.48 The document alleges that Plaintiff owes **\$818.**

13 4.49 The document also alleges in pertinent part:

14 Dear CARL ANDREW PARKS: Below are the results of  
15 your reinvestigation request and, as applicable, any  
16 revisions to your credit file...**We have researched the**  
17 **credit account. Account # \*\*\*\*\*6003 The results**  
18 **are:** The explanation previously attached to this account  
19 has been deleted. . If you have additional questions  
20 about this item please contact: Discover Bank...<sup>11</sup>

21 4.50 The document alleges that Plaintiff owes **\$4,449.**

22 4.51 The document also alleges in pertinent part:

23 Dear CARL ANDREW PARKS: Below are the results of  
24 your reinvestigation request and, as applicable, any  
25 revisions to your credit file...**We have researched the**  
26 **credit account. Account # \*\*\*\*\*0632 The results**  
**are:** The explanation previously attached to this account

<sup>10</sup> Exhibit 4.

<sup>11</sup> Exhibit 4.

has been deleted. . If you have additional questions about this item please contact: Hsbc Bank...<sup>12</sup>

4.52 The document alleges that Plaintiff is responsible for a charged off balance of **\$1,694**.

4.53 The document also alleges in pertinent part:

Dear CARL ANDREW PARKS: Below are the results of your reinvestigation request and, as applicable, any revisions to your credit file...**We have researched the credit account. Account # \*1809 The results are:** The explanation previously attached to this account has been deleted...If you have additional questions about this item please contact: Citgo/Citibank...<sup>13</sup>

4.54 The document alleges that Plaintiff is responsible for a charged off balance of **\$726**.

4.55 The document also alleges in pertinent part:

Dear CARL ANDREW PARKS: Below are the results of your reinvestigation request and, as applicable, any revisions to your credit file...**We have researched the credit account. Account # \*\*\*\*\*0479 The results are:** The explanation previously attached to this account has been deleted...If you have additional questions about this item please contact: Exxon/Mobil/CBNA, Citibank CD Unit...<sup>14</sup>

4.56 The document alleges that Plaintiff owes **\$808**.

<sup>12</sup> Exhibit 4.

<sup>13</sup> Exhibit 4.

<sup>14</sup> Exhibit 4.

1 4.57 The document also alleges in pertinent part:

2 Dear CARL ANDREW PARKS: Below are the results of  
3 your reinvestigation request and, as applicable, any  
4 revisions to your credit file... **We have researched the  
5 credit account. Account # \*\*\*\*\*8162 The results  
6 are:** The explanation previously attached to this account  
7 has been deleted...If you have additional questions about  
8 this item please contact: Zales/Cbsd, Citibank CD  
9 Unit...”<sup>15</sup>

10 4.58 The account is identified as “charge off.”

11 4.59 The document alleges that Plaintiff owes **\$1,054.**

12 4.60 The document also alleges in pertinent part:

13 Dear CARL ANDREW PARKS: Below are the results of  
14 your reinvestigation request and, as applicable, any  
15 revisions to your credit file... **We have researched the  
16 credit account. Account # \*\*\*\*\*8286 The results are:**  
17 The explanation previously attached to this account has  
18 been deleted...If you have additional questions about this  
19 item please contact: Macy’s/Dsnb...”<sup>16</sup>

20 4.61 The document alleges that Plaintiff owes **\$579.**

21 4.62 However, these accounts do not belong to Plaintiff.

22 4.63 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
23 with creditors and/or collection agencies and “verified” that Plaintiff is  
24 responsible for the debt(s).

25 <sup>15</sup> Exhibit 4.

26 <sup>16</sup> Exhibit 4.

1 4.64 Equifax's assertion that Plaintiff is financially responsible for the  
2 debt(s) is patently false.

3  
4 4.65 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
5 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*1963**, stating in pertinent part:

6 Dear CARL ANDREW PARKS: Below are the results of  
7 your reinvestigation request and, as applicable, any  
8 revisions to your credit file...**We have reviewed the**  
9 **bankruptcy information. Case or ID # \*\*\*1535 The**  
10 **results are:** We verified that this item belongs to you. If  
11 you have additional questions about this item please  
12 contact: WA FED Bk CT-Spokane...<sup>17</sup>

12 4.66 Plaintiff did not file for **bankruptcy**.

13 4.67 The document also alleges that Plaintiff is liable for a Capital One  
14 Bank USA Na account No. \*\*\*\*\*6592\*.

15 4.68 The document alleges that Plaintiff owes **\$1,960**.

16 4.69 The document also alleges that Plaintiff is liable for a Capital One  
17 Bank USA Na account No. \*\*\*\*\*4701.

18 4.70 The document alleges that Plaintiff owes **\$2,208**.

19 4.71 The document also alleges that Plaintiff is liable for a Capital One  
20 Bank USA Na account No. \*\*\*\*\*1616.

21 4.72 The document alleges that Plaintiff owes **\$2,245**.

22  
23  
24  
25 <sup>17</sup> Exhibit 5.

1 4.73 The document also alleges that Plaintiff is liable for a Capital One  
2 Bank USA Na account No. \*\*\*\*\*6783.

3  
4 4.74 The document alleges that Plaintiff owes **\$1,475**.

5 4.75 However, these accounts and this **bankruptcy** do not belong to  
6 Plaintiff.

7  
8 4.76 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
9 with the court, creditors and/or collection agencies and “verified” that Plaintiff is  
10 responsible for the debt(s) and the bankruptcy.

11  
12 4.77 Equifax’s assertion that Plaintiff is financially responsible for the  
13 debt(s) is patently false.

14 4.78 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
15 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*0664**, stating in pertinent part:

16  
17 Dear CARL ANDREW PARKS: Below are the results of  
18 your reinvestigation request and, as applicable, any  
19 revisions to your credit file...**We have researched the**  
20 **credit account. Account # \*\*\*\*\*9915 The results**  
21 **are:** We verified that the last payment date is reporting  
22 correctly. This creditor/agency has verified to OUR  
23 company that the date of last activity is being reported  
24 correctly...If you have additional questions about this  
25 item please contact: Bank of America...”<sup>18</sup>

26 4.79 The document alleges that the account was charged off.

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<sup>18</sup> Exhibit 6.



1 4.80 The document also alleges that Equifax verified that Plaintiff is  
2 responsible for a **Portfolio Recovery Associates** account number “**FIA**  
3 **\*\*\*\*\*9915\***” in the amount of **\$8,756**.  
4

5 4.81 The document also alleges that Equifax verified that Plaintiff is  
6 responsible for a **Citicards CBNA** account number “**\*\*\*\*\*9281\***” that was  
7 allegedly “**charged off.**”  
8

9 4.82 The document alleges that Plaintiff owes **\$10,244**.

10 4.83 The document also alleges that Equifax verified that Plaintiff is  
11 responsible for another Bank of America account number “**\*\*\*\*\*9928\***” that  
12 was allegedly “**charged off.**”  
13

14 4.84 However, these accounts do not belong to Plaintiff.

15 4.85 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
16 with creditors and/or collection agencies and “verified” that Plaintiff is  
17 responsible for the debt(s).  
18

19 4.86 Equifax’s assertion that Plaintiff is financially responsible for the  
20 debt(s) is patently false.  
21

22 4.87 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
23 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*1412**, stating in pertinent part:  
24  
25

Dear CARL ANDREW PARKS: Below are the results of your reinvestigation request and, as applicable, any revisions to your credit file...**We have researched the credit account. Account # \*\*\*\*\*0125\* The results are:** ...This creditor has verified to OUR company that the prior paying history is being reported correctly...If you have additional questions about this item please contact: Alaska USA Federal Credit...<sup>19</sup>

4.88 The document alleges that Plaintiff owes **\$846**.

4.89 The account does not belong to Plaintiff, Carl Andrew Parks.

4.90 Nevertheless, Equifax informed Plaintiff that Equifax communicated with creditor and “verified” that Plaintiff is responsible for the debts.

4.91 Equifax’s assertion that Plaintiff is financially responsible for the debt is patently false.

4.92 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE: MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*8582**, stating in pertinent part:

Dear CARL ANDREW PARKS: Below are the results of your reinvestigation request and, as applicable, any revisions to your credit file...**We have reviewed the judgment information. Case or ID # - \*\*\*1828 The results are:** ...We have verified that this public record item is reporting correctly. If you have additional questions about this item please contact: 1100 WEST MALLON...<sup>20</sup>

<sup>19</sup> Exhibit 7.

<sup>20</sup> Exhibit 8.

1 4.93 The document goes on to allege specific information about the  
2 “**judgment.**”

3  
4 4.94 The document alleges that Plaintiff owes a **judgment** in the amount  
5 of **\$701**, to Peterson Enterprises, which is a Spokane Collection Agency.

6  
7 4.95 The document also alleges that Equifax verified that Plaintiff is  
8 responsible for another collection account number “\*\*\***3560.**”

9  
10 4.96 The document also alleges that Plaintiff owes a collection account in  
11 the amount of **\$117**, to “**Associated Credit Service,**” another Spokane  
12 Collection agency.

13  
14 4.97 The document also alleges that Equifax verified that Plaintiff is  
15 responsible for another account number “\*\*\*\*\***9800.**”

16  
17 4.98 The document also alleges that Plaintiff owes a “charge off” amount  
18 of **\$9,323**, to THD/CBNA.

19  
20 4.99 This account has extremely poor credit information, including:  
21 “Charge Off,” and “Closed by Credit Grantor.”

22 4.100 However, these accounts do not belong to Plaintiff.

23  
24 4.101 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
25 with creditors and/or collection agencies and “verified” that Plaintiff is  
26 responsible for the debt(s).

1 4.102 Equifax's assertion that Plaintiff is financially responsible for the  
2 debt(s) is patently false.

3  
4 4.103 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
5 **MARCH 9, 2015, CONFIRMATION # \*\*\*\*\*6925**, stating in pertinent part:

6 Dear CARL ANDREW PARKS: Below are the results of  
7 your reinvestigation request and, as applicable, any  
8 revisions to your credit file... **We have researched the**  
9 **collection account. Account # \*\*\*\*2428 The results**  
10 **are: ...We verified that this item belongs to you...If you**  
11 **have additional questions about this item please contact:**  
12 **Cab Collection Agency...<sup>21</sup>**

13 4.104 The document alleges that Plaintiff owes **\$7,194**.

14 4.105 The document also alleges that Equifax verified that Plaintiff is  
15 responsible for another collection account number **“\*\*5007\*.”**

16 4.106 The document alleges that Plaintiff owes a collection amount of  
17 **\$1,203**, to Midland Funding, LLC, a national debt buyer.

18 4.107 However, these accounts do not belong to Plaintiff.

19 4.108 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
20 with creditors and/or collection agencies and “verified” that Plaintiff is  
21 responsible for the debt(s).  
22  
23

24  
25 <sup>21</sup> Exhibit 9.

1 4.109 Equifax's assertion that Plaintiff is financially responsible for the  
2 debt(s) is patently false.

3  
4 4.110 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
5 **MARCH 2, 2015, CONFIRMATION # \*\*\*\*\*5216**, stating in pertinent part:

6 Dear CARL ANDREW PARKS: Below are the results of  
7 your reinvestigation request and, as applicable, any  
8 revisions to your credit file...**We have researched the**  
9 **credit account. Account # \*\*\*\*\*5672\* The results**  
10 **are:** ...The balance of this item has been updated...If  
11 you have additional questions about this item please  
12 contact: Sears/CBNA...<sup>22</sup>

13 4.111 The document alleges that Plaintiff owes **\$1,333**.

14 4.112 The document also alleges that Equifax verified that Plaintiff was  
15 responsible for another account number "**775\***."

16 4.113 The document alleges that Plaintiff owed to a mortgage debt to  
17 Ocwen Loan Servicing.

18 4.114 However, these accounts do not belong to Plaintiff.

19 4.115 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
20 with creditors and/or collection agencies and "verified" that Plaintiff is  
21 responsible for the debt(s).  
22  
23

24  
25 <sup>22</sup> Exhibit 10.

1 4.116 Equifax’s assertion that Plaintiff is financially responsible for the  
2 debt(s) is patently false.

3  
4 4.117 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
5 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*5579**, stating in pertinent part:

6 Dear CARL ANDREW PARKS: Below are the results of  
7 your reinvestigation request and, as applicable, any  
8 revisions to your credit file... **We have researched the**  
9 **credit account. Account # \*\*\*\*\*2450\* The results**  
10 **are: ... We verified that this item belongs to you.... If you**  
11 **have additional questions about this item please contact:**  
12 **Fingerhut... ”<sup>23</sup>**

13 4.118 The document also alleges that Equifax verified that Plaintiff was  
14 responsible for another account number “\*\*\*\*\***2551\***.”

15 4.119 The form states that Plaintiff owed a “charge off” balance of  
16 **\$12,412**, to Santander Consumer, a National Finance Company.

17 4.120 However, these accounts do not belong to Plaintiff.

18 4.121 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
19 with creditors and/or collection agencies and “verified” that Plaintiff is  
20 responsible for the debt(s).

21 4.122 Equifax’s assertion that Plaintiff is financially responsible for the  
22 debt(s) is patently false.

23  
24  
25 

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<sup>23</sup> **Exhibit 11.**

1 4.123 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
2 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*1035**, stating in pertinent part  
3

4 Dear CARL ANDREW PARKS: Below are the results of  
5 your reinvestigation request and, as applicable, any  
6 revisions to your credit file...**We have researched the**  
7 **credit account. Account # \*\*\*\*\*3869\* The results**  
8 **are:** ...This account has been updated to report as a paid  
charge off...If you have additional questions about this  
item please contact: Capital One...<sup>24</sup>

9 4.124 However, the account does not belong to Plaintiff.

10 4.125 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
11 with creditors and/or collection agencies and “verified” that Plaintiff is  
12 responsible for the “**charge off**” debt.  
13

14 4.126 Equifax’s assertion that Plaintiff is financially responsible for the  
15 debt(s) is patently false.  
16

17 4.127 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
18 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*0025**, stating in pertinent part:  
19

20 Dear CARL ANDREW PARKS: Below are the results of  
21 your reinvestigation request and, as applicable, any  
22 revisions to your credit file...**We have researched the**  
23 **credit account. Account # \*\*\*\*\*3631\* The results**  
24 **are:** ...This creditor has verified to OUR company that  
the current status is being reported correctly...If you

25 <sup>24</sup> Exhibit 12.

1 have additional questions about this item please contact:  
2 Credit One Bank...<sup>25</sup>

3 4.128 The document also alleges that Plaintiff owes Credit One Bank a  
4 balance of **\$509**.

5  
6 4.129 The account does not belong to Plaintiff, Carl Andrew Parks.

7 4.130 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
8 with creditor and “verified” that Plaintiff is responsible for the debt.  
9

10 4.131 Equifax’s assertion that Plaintiff is financially responsible for the  
11 debt is patently false.

12 4.132 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
13 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*7139**, stating in pertinent part:  
14

15 Dear CARL ANDREW PARKS: Below are the results of  
16 your reinvestigation request and, as applicable, any  
17 revisions to your credit file... **We have researched the**  
18 **credit account. Account # \*\*\*\*\*3631\* The results**  
19 **are:** ...The creditor is currently reporting a zero balance  
20 for this account...If you have additional questions about  
21 this item please contact: Midland Credit  
22 Management...<sup>26</sup>

23 4.133 The document alleges that Plaintiff owed a “collection” account to  
24 Midland Funding, a national debt buyer.

25 <sup>25</sup> Exhibit 13.

26 <sup>26</sup> Exhibit 14.



1 4.134 However, the account does not belong to Plaintiff.

2 4.135 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
3 with collection agencies and “verified” that Plaintiff is responsible for the debt.  
4

5 4.136 Equifax’s assertion that Plaintiff is financially responsible for the  
6 debt is patently false.  
7

8 4.137 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
9 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*8136**, stating in pertinent part:

10 Dear CARL ANDREW PARKS: Below are the results of  
11 your reinvestigation request and, as applicable, any  
12 revisions to your credit file... **We have researched the**  
13 **collection account. Account # \*\*\*8045 The results**  
14 **are:** We verified that this item belongs to you...If you  
15 have additional questions about this item please contact:  
Evergreen Financial Servic...”<sup>27</sup>

16 4.138 The document alleges that Plaintiff owes a **\$144** “collection”  
17 account to a collection agency by the name of Evergreen Financial.

18 4.139 The document also indicates that Equifax verified that Plaintiff was  
19 responsible for another “collection” account number “\*\*\*4060.”  
20

21 4.140 The document alleges that Plaintiff owes a **\$113** “collection”  
22 account to a collection agency by the name of Merchant Credit.  
23

24  
25 <sup>27</sup> Exhibit 15.

1 4.141 The document also alleges that Equifax verified that Plaintiff was  
2 responsible for another “collection” account number “\*\*\*3983.”  
3

4 4.142 The document also alleges that Plaintiff owes a \$60 “collection”  
5 account to a collection agency by the name of Merchant Credit.  
6

7 4.143 The document also alleges that Equifax verified that Plaintiff was  
8 responsible for a “charge off” account number “\*\*\*\*\*6481.”  
9

10 4.144 The document alleges that Plaintiff owed Synco/JC Penneys \$1,007  
11 that was ultimately charged off.  
12

13 4.145 The document also alleges that Equifax verified that Plaintiff was  
14 responsible for a “collection” account number “GE \*\*\*\*\*6481.”  
15

16 4.146 The document also alleges that Plaintiff paid Portfolio Recovery  
17 Associates \$1,425 in September of 2014, to pay off the collection account.  
18

19 4.147 However, none of the above accounts belong to Plaintiff and  
20 Plaintiff never paid Portfolio any money to resolve a charged off collection  
21 account.  
22

23 4.148 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
24 with creditors and/or collection agencies and “verified” that Plaintiff is  
25 responsible for the debt(s).  
26

1 4.149 Equifax’s assertion that Plaintiff is financially responsible for the  
2 debt(s) is patently false.

3  
4 4.150 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
5 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*9498**, stating in pertinent part:

6 Dear CARL ANDREW PARKS: Below are the results of  
7 your reinvestigation request and, as applicable, any  
8 revisions to your credit file...**We have researched the**  
9 **collection account. Account # \*\*\*\*\*0000**  
10 **The results are:** We verified that this item belongs to  
11 you...If you have additional questions about this item  
please contact: Ars Account Resolution...”<sup>28</sup>

12 4.151 The document alleges that Plaintiff owes a **\$298** “collection”  
13 account to Ars Account Resolution, a collection agency.

14 4.152 The document also alleges that Equifax verified that Plaintiff was  
15 responsible for another account number “\*\*\*\***4062**.”

16 4.153 The account is allegedly owed to “Wells FARGO Dealer Service.”

17 4.154 However, these accounts do not belong to Plaintiff.

18 4.155 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
19 with creditors and/or collection agencies and “verified” that Plaintiff is  
20 responsible for the debt(s).  
21  
22  
23

24  
25 <sup>28</sup> **Exhibit 16.**

1 4.156 Equifax’s assertion that Plaintiff is financially responsible for the  
2 debt(s) is patently false.

3  
4 4.157 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
5 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*8113**, stating in pertinent part:

6 Dear CARL ANDREW PARKS: Below are the results of  
7 your reinvestigation request and, as applicable, any  
8 revisions to your credit file... **We have researched the**  
9 **collection account. Account # \*\*\*\*2496 The results**  
10 **are:** We verified that this item belongs to you...If you  
11 have additional questions about this item please contact:  
CBA Collection Bureau of A...”<sup>29</sup>

12 4.158 The document alleges that Plaintiff owes a **\$449** “collection”  
13 account to a collection agency.

14 4.159 The document also alleges that Equifax verified that Plaintiff is  
15 responsible for yet another charged off account, number \*\*\*\*\*3869, in the  
16 amount of **\$4,350**.

17 4.160 However, these charged off accounts do not belong to Plaintiff.

18 4.161 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
19 with creditors and/or collection agencies and “verified” that Plaintiff is  
20 responsible for the debt(s).  
21  
22  
23

24  
25 <sup>29</sup> **Exhibit 17.**

1 4.162 Equifax’s assertion that Plaintiff is financially responsible for the  
2 debt(s) is patently false.

3  
4 4.163 The form also states that Plaintiff’s name was “updated” to another  
5 individual’s name.

6 4.164 Plaintiff, Carl Andrew Parks never requested a name change.

7  
8 4.165 The document also contains a new date of birth and new social  
9 security number for Plaintiff.

10 4.166 Plaintiff, Carl Andrew Parks never requested a change of date of  
11 birth or social security number.

12  
13 4.167 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
14 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*5894**, stating in pertinent part:

15  
16 Dear CARL ANDREW PARKS: Below are the results of  
17 your reinvestigation request and, as applicable, any  
18 revisions to your credit file...**We have researched the**  
19 **credit account. Account # \*\*\*\*\*7886 The results**  
20 **are:** We verified that this item belongs to you...If you  
21 have additional questions about this item please contact:  
22 First Premier...”<sup>30</sup>

23 4.168 The account does not belong to Plaintiff, Carl Andrew Parks.

24 4.169 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
25 with the creditor and “verified” that Plaintiff is responsible for the debt.

26 <sup>30</sup> Exhibit 18.

1 4.170 Equifax’s assertion that Plaintiff is financially responsible for the  
2 debt is patently false.

3  
4 4.171 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
5 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*7359**, stating in pertinent part:

6 Dear CARL ANDREW PARKS: Below are the results of  
7 your reinvestigation request and, as applicable, any  
8 revisions to your credit file... **We have researched the**  
9 **collection account. Account # \*\*5691 The results**  
10 **are:** We verified that this item belongs to you...If you  
11 have additional questions about this item please contact:  
Associated Credit Service...”<sup>31</sup>

12 4.172 The document alleges that Plaintiff paid a \$250 “collection” account  
13 to a collection agency.

14 4.173 The document also alleges that Equifax verified that Plaintiff is  
15 responsible for yet another collection account, Associated Credit Service account  
16 number \*\*7646, in the amount of **\$645**.

17  
18 4.174 However, these accounts do not belong to Plaintiff.

19  
20 4.175 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
21 with creditors and/or collection agencies and “verified” that Plaintiff is  
22 responsible for the debt(s).

23  
24  
25 <sup>31</sup> **Exhibit 19.**

1 4.176 Equifax’s assertion that Plaintiff is financially responsible for the  
2 debt(s) is patently false.

3  
4 4.177 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
5 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*8928**, stating in pertinent part:

6 Dear CARL ANDREW PARKS: Below are the results of  
7 your reinvestigation request and, as applicable, any  
8 revisions to your credit file...**We have researched the**  
9 **collection account. Account # \*\*9508 The results**  
10 **are:** We verified that this item belongs to you...If you  
11 have additional questions about this item please contact:  
12 Health Services Asset...”<sup>32</sup>

13 4.178 The document alleges that Plaintiff owes a **\$1,116** “collection”  
14 account to a collection agency.

15 4.179 The document also alleges that Equifax verified that Plaintiff is  
16 responsible for yet another collection account, Doctor’s Coll Service account  
17 number \*\*1117, in the amount of **\$774**.

18 4.180 The document also alleges that Equifax verified that Plaintiff is  
19 responsible for yet another credit account, Army Airforce Exchange account  
20 number \*\*\*\*\*0532\*, in the amount of **\$7,382**.

21 4.181 However, these accounts do not belong to Plaintiff.  
22  
23  
24

25 <sup>32</sup> Exhibit 20.

1 4.182 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
2 with creditors and/or collection agencies and “verified” that Plaintiff is  
3 responsible for the debt(s).  
4

5 4.183 Equifax’s assertion that Plaintiff is financially responsible for the  
6 debt(s) is patently false.  
7

8 4.184 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
9 **MARCH 9, 2015, CONFIRMATION # \*\*\*\*\*4349**, stating in pertinent part:  
10

Dear CARL ANDREW PARKS: Below are the results of  
11 your reinvestigation request and, as applicable, any  
12 revisions to your credit file... **We have researched the**  
13 **collection account. Account # \*\*\*\*0263 The results**  
14 **are:** We verified that this item belongs to you...If you  
15 have additional questions about this item please contact:  
Cach, LLC...”<sup>33</sup>

16 4.185 The document alleges that Plaintiff owes a **\$14,174** “collection”  
17 account to a collection agency.

18 4.186 The document also alleges that Equifax verified that Plaintiff is  
19 responsible for yet another collection account, Valley EMPIRE coll CO account  
20 number \*\*\*3492, in the amount of **\$56**.  
21

22 4.187 However, these accounts do not belong to Plaintiff.  
23  
24

25 <sup>33</sup> **Exhibit 21.**



1 4.188 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
2 with creditors and/or collection agencies and “verified” that Plaintiff is  
3 responsible for the debt(s).  
4

5 4.189 Equifax’s assertion that Plaintiff is financially responsible for the  
6 debt(s) is patently false.  
7

8 4.190 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
9 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*8606**, stating in pertinent part:  
10

11 Dear CARL ANDREW PARKS: Below are the results of  
12 your reinvestigation request and, as applicable, any  
13 revisions to your credit file... **We have researched the**  
14 **credit account. Account # \*\*\*\*2712\* The results are:**  
15 We verified that this item belongs to you...If you have  
16 additional questions about this item please contact:  
17 Alaska USA Federal Cu...”<sup>34</sup>

18 4.191 The document alleges that Plaintiff is responsible for yet another  
19 “Charge Off” account in the amount of **\$285**.  
20

21 4.192 The account does not belong to Plaintiff, Carl Andrew Parks.

22 4.193 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
23 with the creditor and “verified” that Plaintiff is responsible for the debt.  
24

25 4.194 Equifax’s assertion that Plaintiff is financially responsible for the  
26 debt is patently false.

---

<sup>34</sup> Exhibit 22.

1 4.195 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
2 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*8744**, stating in pertinent part:  
3

4 Dear CARL ANDREW PARKS: Below are the results of  
5 your reinvestigation request and, as applicable, any  
6 revisions to your credit file...**We have researched the**  
7 **collection account. Account # \*\*3249\*** **The results**  
8 **are:** We verified that this item belongs to you...If you  
9 have additional questions about this item please contact:  
10 Valley EMPIRE Coll Co...<sup>35</sup>

11 4.196 The document alleges that Plaintiff paid yet another “collection”  
12 account in the amount of \$456.

13 4.197 The document also alleges that Equifax verified that Plaintiff is  
14 responsible for yet another collection account, CBS Collections account number  
15 **\*\*3327**, in the amount of **\$355**.

16 4.198 The document also alleges that Equifax verified that Plaintiff is  
17 responsible for yet another collection account, Aetna Adjustment account number  
18 **\*\*\*\*\*5265**, in the amount of **\$198**.

19 4.199 The document also alleges that Equifax verified that Plaintiff is  
20 responsible for yet another credit account, Navient account number  
21 **\*\*\*\*\*0042\***, in the amount of **\$1,003**.

22  
23  
24  
25 <sup>35</sup> Exhibit 23.

1 4.200 The document also alleges that Equifax verified that Plaintiff is  
2 responsible for yet another “Charge Off” account, Verizon Wireless/Southeast  
3 account number \*\*\*\*\*7510\*, in the amount of **\$528**.

5 4.201 The document also alleges that Equifax verified that Plaintiff is  
6 responsible for yet another “collection” account, Midland Credit MGMT Inc  
7 account number \*\*4757\*, in the amount of **\$1,352**.

9 4.202 However, these accounts do not belong to Plaintiff.

10 4.203 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
11 with creditors and/or collection agencies and “verified” that Plaintiff is  
12 responsible for the debt(s).

14 4.204 Equifax’s assertion that Plaintiff is financially responsible for the  
15 debt(s) is patently false.

17 4.205 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
18 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*4667**, stating in pertinent part:

20 Dear CARL ANDREW PARKS: Below are the results of  
21 your reinvestigation request and, as applicable, any  
22 revisions to your credit file... **We have researched the**  
23 **collection account. Account # \*\*\*9510 The results**  
24 **are:** This creditor has verified to OUR company that the  
25 balance is being reported correctly...If you have

1 additional questions about this item please contact:  
2 Evergreen Professional Rec...”<sup>36</sup>

3 4.206 The document alleges that the account was “paid.”

4 4.207 The document also alleges that Equifax verified that Plaintiff is  
5 responsible for yet another credit account, Suntrust Bank account number  
6 \*\*\*\*\*0000\*, in the amount of **\$86,400**.

7  
8 4.208 The document also alleges that Equifax verified that Plaintiff is  
9 responsible for yet another credit account, Ocwen Loan Servicing, LLC account  
10 number -7191\*, in the amount of **\$100,093**.

11  
12 4.209 The document also alleges that Equifax verified that Plaintiff is  
13 responsible for yet another credit account, Capital One Bank USA Na account  
14 number \*\*\*\*\*3295\*, in the amount of **\$466**.

15  
16 4.210 However, these accounts and the judgment do not belong to  
17 Plaintiff.

18  
19 4.211 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
20 with the court, creditors, and/or collection agencies and “verified” that Plaintiff is  
21 responsible for the judgment and the debt(s).

22  
23  
24  
25 

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<sup>36</sup> Exhibit 24.

1 4.212 Equifax’s assertion that Plaintiff is financially responsible for the  
2 debt(s) is patently false.

3  
4 4.213 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
5 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*9492,** updating Plaintiff’s  
6 address to Fairbanks, AK, and alleging that Plaintiff was responsible for yet  
7 another **judgment** that was issued in Virginia.<sup>37</sup>

9 4.214 The judgment amount is **\$2,640.**

11 4.215 The judgment was not issued against Plaintiff.

12 4.216 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
13 with court and “verified” that Plaintiff is responsible for the judgment.

14 4.217 Equifax’s assertion that Plaintiff is financially responsible for the  
15 judgment or the underlying debt is patently false.

17 4.218 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
18 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*2737,** stating in pertinent part:

20 Dear CARL ANDREW PARKS: Below are the results of  
21 your reinvestigation request and, as applicable, any  
22 revisions to your credit file... **We have researched the**  
23 **credit account. Account # \*\*\*\*\*6576 The results**  
24 **are:** This creditor has verified to OUR company that the  
25 balance is being reported correctly... If you have

37 **Exhibit 25.**

1 additional questions about this item please contact:  
2 Geerb/JC Penneys...<sup>38</sup>

3 4.219 The document also alleges that Equifax verified that Plaintiff is  
4 responsible for yet another credit account, Best Buy/CBNA account number  
5 \*\*\*\*\*6897\*, in the amount of **\$1,409**.  
6

7 4.220 The document also alleges that Equifax verified that Plaintiff is  
8 responsible for yet another credit account, Numerica Credit Union account  
9 number \*\*9896\*, in the amount of **\$15,102**.  
10

11 4.221 The document also alleges that Equifax verified that Plaintiff is  
12 responsible for yet another credit account, Numerica Credit Union account  
13 number \*\*9896\*, in the amount of **\$9,505**.  
14

15 4.222 The document also alleges that Equifax verified that Plaintiff is  
16 responsible for yet another credit account, Chase Bank account number  
17 \*\*\*\*\*3966\*.  
18

19 4.223 However, these accounts do not belong to Plaintiff.

20 4.224 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
21 with creditors and/or collection agencies and “verified” that Plaintiff is  
22 responsible for the debt(s).  
23  
24

25 <sup>38</sup> Exhibit 26.

1 4.225 Equifax’s assertion that Plaintiff is financially responsible for the  
2 debt(s) is patently false.

3  
4 4.226 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
5 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*7310**, stating in pertinent part:

6 Dear CARL ANDREW PARKS: Below are the results of  
7 your reinvestigation request and, as applicable, any  
8 revisions to your credit file...**We have researched the**  
9 **collection account. Account # \*\*\*\*\*1799 The**  
10 **results are:** This creditor has verified to OUR company  
11 that the balance is being reported correctly...If you have  
12 additional questions about this item please contact:  
13 Automated Accounts Inc...”<sup>39</sup>

14 4.227 The document also alleges that Equifax verified that Plaintiff is  
15 responsible for yet another credit account, Fedloan Servicing Credit account  
16 number \*\*\*\*\*9FD0\*.

17 4.228 The account is described as: “Over 120 Days Past Due.”

18 4.229 The document also alleges that Equifax verified that Plaintiff is  
19 responsible for yet another credit account, Fedloan Servicing Credit account  
20 number \*\*\*\*\*9FD0\*.

21 4.230 The account is described as: “Over 120 Days Past Due.”  
22  
23  
24

25 <sup>39</sup> **Exhibit 27.**

1 4.231 The document also alleges that Equifax verified that Plaintiff is  
2 responsible for yet another credit account, Fedloan Servicing Credit account  
3 number \*\*\*\*\*9FD0\*.  
4

5 4.232 The account is described as: "Over 120 Days Past Due."

6 4.233 The document also alleges that Equifax verified that Plaintiff is  
7 responsible for yet another collection account, Merchants Acceptance Corp  
8 account number \*\*0000\*.  
9

10 4.234 The account is described as: "Charge Off."

11 4.235 The document also alleges that Equifax verified that Plaintiff is  
12 responsible for yet another credit account, Fedloan Servicing Credit account  
13 number \*\*\*\*\*9FD0\*.  
14

15 4.236 The account is described as: "Over 120 Days Past Due."

16 4.237 The document also alleges that Equifax verified that Plaintiff is  
17 responsible for yet another credit account, Dept of Ed/Nelnet account number  
18 \*\*\*\*\*3353\*.  
19

20 4.238 The account is described as: "90 - 119 Days Past Due."

21 4.239 The document also alleges that Equifax verified that Plaintiff is  
22 responsible for yet another credit account, Dept of Ed/Nelnet account number  
23 \*\*\*\*\*3353\*.  
24



1 4.240 The account is described as: “90 - 119 Days Past Due.”

2 4.241 However, these accounts do not belong to Plaintiff.

3  
4 4.242 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
5 with creditors and/or collection agencies and “verified” that Plaintiff is  
6 responsible for the debt(s).

7  
8 4.243 Equifax’s assertion that Plaintiff is financially responsible for the  
9 debt(s) is patently false.

10 4.244 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
11 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*8661,** stating in pertinent part:

12  
13 Dear CARL ANDREW PARKS: Below are the results of  
14 your reinvestigation request and, as applicable, any  
15 revisions to your credit file... **We have researched the**  
16 **collection account. Account # \*\*\*\*\*3FD0 The**  
17 **results are:** The status of this account has been  
18 updated...If you have additional questions about this  
19 item please contact: Fedloan Servicing Credit...<sup>40</sup>

20 4.245 The document alleges that Plaintiff “90 – 119 Days Past Due” on an  
21 education loan debt of **\$5,354.**

22 4.246 The document also alleges that Equifax verified that Plaintiff is  
23 responsible for yet another credit account, Alaska Commission on account  
24 number \*\*\*\*\*4012\*.

25 <sup>40</sup> Exhibit 28.

1 4.247 The account is described as: “Over 120 Days Past Due.”

2 4.248 The document also alleges that Equifax verified that Plaintiff is  
3 responsible for yet another credit account, Fedloan Servicing Credit account  
4 number \*\*\*\*\*3FD0\*.  
5

6 4.249 The document alleges that Plaintiff “90 – 119 Days Past Due” on an  
7 education loan debt of **\$4,809**.  
8

9 4.250 The document also alleges that Equifax verified that Plaintiff is  
10 responsible for yet another credit account, Fedloan Servicing Credit account  
11 number \*\*\*\*\*3FD0\*.  
12

13 4.251 The document alleges that Plaintiff “90 – 119 Days Past Due” on an  
14 education loan debt of **\$4,526**.  
15

16 4.252 The document also alleges that Equifax verified that Plaintiff is  
17 responsible for yet another credit account, Fedloan Servicing Credit account  
18 number \*\*\*\*\*3FD0\*.  
19

20 4.253 The document alleges that Plaintiff “90 – 119 Days Past Due” on an  
21 education loan debt of **\$7,694**.  
22

23 4.254 However, these accounts do not belong to Plaintiff.  
24  
25

1 4.255 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
2 with creditors and/or collection agencies and “verified” that Plaintiff is  
3 responsible for the debt(s).  
4

5 4.256 Equifax’s assertion that Plaintiff is financially responsible for the  
6 debt(s) is patently false.  
7

8 4.257 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
9 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*6564**, stating in pertinent part:  
10

Dear CARL ANDREW PARKS: Below are the results of  
11 your reinvestigation request and, as applicable, any  
12 revisions to your credit file...**We have researched the**  
13 **collection account. Account # \*\*\*\*0888 The results**  
14 **are:** We verified that this item belongs to you...If you  
15 have additional questions about this item please contact:  
Cavalry Portfolio Services...”<sup>41</sup>

16 4.258 The document alleges that Plaintiff a collection debt of **\$24,783**.

17 4.259 The document also alleges that Equifax verified that Plaintiff is  
18 responsible for yet another collection account, Health Services Asset account  
19 number \*\*9013.  
20

21 4.260 The debt is alleged to be **\$95**.  
22  
23  
24

25 <sup>41</sup> **Exhibit 29.**

1 4.261 The document also alleges that Equifax verified that Plaintiff is  
2 responsible for yet another collection account, Cavalry Portfolio Services account  
3 number \*\*\*\*9363.

4  
5 4.262 The debt is alleged to be **\$31,816**.

6 4.263 The document also alleges that Equifax verified that Plaintiff is  
7 responsible for yet another charged off credit account, US Bank account number  
8 \*\*\*\*\*6220\*.

9  
10 4.264 The document alleges that Plaintiff is responsible for a charged off  
11 debt in the amount of **\$24,968**.

12  
13 4.265 The document also alleges that Equifax verified that Plaintiff is  
14 responsible for yet another charged off credit account, Bank of America account  
15 number \*\*\*\*\*9954\*.

16  
17 4.266 The document also alleges that Equifax verified that Plaintiff is  
18 responsible for yet another charged off credit account, Bank of America account  
19 number \*\*\*\*\*9724\*.

20  
21 4.267 The document also alleges that Equifax verified that Plaintiff is  
22 responsible for yet another credit account, Elevations Federal Cu account number  
23 1337\*.

1 4.268 The document also alleges that Equifax verified that Plaintiff is  
2 responsible for yet another credit account, Elevations Federal Cu account number  
3 \*\*3780\*.  
4

5 4.269 The document also alleges that Equifax verified that Plaintiff is  
6 responsible for yet another credit account, Elevations Federal Cu account number  
7 1337\*.  
8

9 4.270 The document also alleges that Equifax verified that Plaintiff is  
10 responsible for yet another credit account, Chase Mortgage account number  
11 \*\*\*\*\*1959\*.  
12

13 4.271 The document also alleges that Equifax verified that Plaintiff is  
14 responsible for yet another credit account, Wells Fargo DLR Svc account number  
15 \*\*\*\*\*0318\*.  
16

17 4.272 The document also alleges that Equifax verified that Plaintiff is  
18 responsible for yet another charged off credit account, Bank of America account  
19 number \*\*\*\*\*9713\*.  
20

21 4.273 The document also alleges that Equifax verified that Plaintiff is  
22 responsible for yet another charged off credit account, Midland Credit MGMT  
23 Inc account number \*\*3979\*.  
24

1 4.274 The document alleges that Plaintiff, Carl Parks owes **\$11,051** for the  
2 above debt.

3  
4 4.275 The document also alleges that Equifax verified that Plaintiff is  
5 responsible for yet another credit account, Citicards CBNA account number  
6 \*\*\*\*\*0345\*.

7  
8 4.276 The document also alleges that Equifax verified that Plaintiff is  
9 responsible for yet another charged off credit account, Credit Union 1 account  
10 number \*\*0592\*.

11  
12 4.277 The document alleges that Plaintiff, Carl Parks owes **\$4,059** for the  
13 above debt.

14  
15 4.278 The document also alleges that Equifax verified that Plaintiff is  
16 responsible for yet another credit account, Chase MTG account number  
17 \*\*\*\*\*8926\*.

18  
19 4.279 The document also alleges that Equifax verified that Plaintiff is  
20 responsible for yet another credit account, Credit Union 1 account number  
21 \*\*0592\*.

22  
23 4.280 The document alleges that Plaintiff, Carl Parks owes **\$24,731** for the  
24 above debt.

1 4.281 The document also alleges that Equifax verified that Plaintiff is  
2 responsible for yet another credit account, Advanta Business Service account  
3 number \*\*\*\*\*0032\*.  
4

5 4.282 The document alleges that Plaintiff, Carl Parks owes **\$6,547** for the  
6 above debt.  
7

8 4.283 The document also alleges that Equifax verified that Plaintiff is  
9 responsible for yet another credit account, Chase Bank account number  
10 \*\*\*\*\*0001\*.  
11

12 4.284 However, these accounts do not belong to Plaintiff.

13 4.285 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
14 with creditors and/or collection agencies and “verified” that Plaintiff is  
15 responsible for the debt(s).  
16

17 4.286 Equifax’s assertion that Plaintiff is financially responsible for the  
18 debt(s) is patently false.  
19

20 4.287 Defendant also mailed Plaintiff **EQUIFAX CREDIT FILE:**  
21 **MARCH 10, 2015, CONFIRMATION # \*\*\*\*\*9010**, stating in pertinent part:  
22

Dear CARL ANDREW PARKS: Below are the results of  
23 your reinvestigation request and, as applicable, any  
24 revisions to your credit file...**We have researched the**  
25 **credit account. Account # \*\*\*\*\*8617 The results**  
26 **are:** We verified that this item belongs to you...If you

1 have additional questions about this item please contact:  
2 Credit One Bank...<sup>42</sup>

3 4.288 The document alleges that Plaintiff is responsible for a charged off  
4 debt in the amount of **\$848**.

5 4.289 The document also alleges that Equifax verified that Plaintiff is  
6 responsible for yet another credit account, Wells FARGO DLER Svc account  
7 number \*\*\*\*1233.  
8

9 4.290 The debt is alleged to be **\$24,681**.

10 4.291 The document also alleges that Equifax verified that Plaintiff is  
11 responsible for yet another collection account, Midland Funding LLC account  
12 number \*\*6078\*.  
13

14 4.292 The debt is alleged to be **\$756**.

15 4.293 The document also alleges that Equifax verified that Plaintiff is  
16 responsible for yet another past due credit account, Credit Union 1 account  
17 number 448211\*.  
18

19 4.294 The document also alleges that Equifax verified that Plaintiff is  
20 responsible for yet another credit account, Prestige Financial Services account  
21 number 67\*.  
22

23  
24  
25 

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<sup>42</sup> **Exhibit 30.**



1 4.295 However, these accounts do not belong to Plaintiff.

2 4.296 Nevertheless, Equifax informed Plaintiff that Equifax communicated  
3 with creditors and/or collection agencies and “verified” that Plaintiff is  
4 responsible for the debt(s).  
5

6 4.297 Equifax’s assertion that Plaintiff is financially responsible for the  
7 debt(s) is patently false.  
8

9 4.298 On March 10, 2015, Equifax mailed Plaintiff a letter stating in  
10 pertinent part: “We are writing to confirm that a security freeze was placed on  
11 your Equifax credit file on March 10, 2015.”<sup>43</sup>  
12

13 4.299 On March 10, 2015, Equifax also mailed Plaintiff a letter stating in  
14 pertinent part: “We are writing to confirm that in response to your request, we  
15 have temporarily lifted the security freeze from your Equifax credit file...”<sup>44</sup>  
16

17 4.300 Plaintiff never requested a security freeze and never requested that  
18 Equifax lift the security freeze.  
19

20 4.301 Plaintiff pored over the large stack of mail from Defendant for  
21 several hours looking for something responsive to his dispute before he realized  
22 that none of the information pertained to his debts.  
23

24  
25 <sup>43</sup> Exhibit 31.

<sup>44</sup> Exhibit 32.

1 4.302 Then, on March 23, 2015, Defendant mailed Plaintiff a letter, stating  
 2 in pertinent part:

3  
 4 On March 15, 2015, we learned that certain consumer  
 5 information was inadvertently mailed to incorrect  
 6 individuals and immediately began investigating. You  
 7 may have received letters that were addressed to you, but  
 8 contained information related to other individuals. We  
 9 have identified that the inadvertent disclosure of  
 10 information was the result of a technical error. We are  
 11 continuing to investigate this incident, but we have no  
 12 evidence of any criminal wrongdoing...<sup>45</sup>

13 4.303 Plaintiff was extremely confused by the above communication  
 14 because it did not address all of the different types of documents that Defendant  
 15 mailed to Plaintiff, only “letters.”<sup>46</sup>

16 4.304 Additionally, Defendant’s letter leaves the distinct impression that  
 17 Defendant does not know how much erroneous information was disseminated,  
 18 who received the erroneous information, or the root of the problem.<sup>47</sup>

19 4.305 Plaintiff did not understand whether Defendant’s letter addressed all  
 20 of the erroneous documents, or if Defendant was still confused about the  
 21 information Defendant mailed to Plaintiff.

22  
 23 <sup>45</sup> **Exhibit 33.** March 23, 2015, letter from Greg Baker, Vice President Corporate Security and Safety,  
 24 Equifax, Inc.

<sup>46</sup> **Exhibits 1 – 32.**

<sup>47</sup> **See, Exhibit 33,** stating in pertinent part: “...certain consumer information...” “You may have  
 25 received letters...” “...technical error...” “We are continuing to investigate this incident...” “If you...receive  
 26 any additional information that does not belong to you...”

1 4.306 Based upon Defendant's letter and Defendant's erroneous  
2 disclosures, Plaintiff rationally believed that Defendants had no idea what  
3 information was released to whom.  
4

5 4.307 Based upon Defendant's letter and Defendant's erroneous  
6 disclosures, Plaintiff rationally feared that his private information and  
7 confidential financial information was disseminated to other consumers.  
8

9 4.308 Based upon Defendant's letter and Defendant's erroneous  
10 disclosures, Plaintiff rationally feared that these other consumers' information  
11 was being reported on his personal credit report.  
12

13 4.309 Therefore, on June 8, 2015, Plaintiff mailed a letter to Defendant,  
14 requesting in pertinent part:  
15

16 I recently disputed erroneous items on my credit report.  
17 In response, I received the attached documents.<sup>48</sup> The  
18 accounts described in the attached documents are not my  
19 accounts. I have never been known by the names  
20 contained in the attached documents. I have never used  
21 the Social Security Numbers or Dates of Birth contained  
22 in the attached documents. I am very concerned that  
23 Equifax has combined my credit file with other  
24 individuals, and that my accounts may be appearing on  
25 other individuals' credit reports. I am also concerned  
26 that my personal and private financial information was  
disseminated to other consumers in response to those

---

<sup>48</sup> Plaintiff attached the Equifax Confirmation Numbers to his June 8, 2015 letter to enable Equifax to locate the proper files and ensure that the accounts were removed from Plaintiff's credit report.

1 consumers' disputes and requests for reinvestigation of  
2 erroneous accounts. Additionally, I never requested a  
3 credit freeze. However, I also received documentation  
4 concerning a freeze placed on my credit file. I hereby  
5 demand that you reinvestigate each and every account  
6 listed in the attached documents. I also demand that you  
7 provide me with a current copy of my consumer credit  
8 report. I also demand that you inform the individuals  
9 named in the attached documents, that their personal and  
10 private financial information was sent to my home.<sup>49</sup>

11 4.310 Equifax never responded to the above letter from Plaintiff.

12 4.311 Plaintiff has been left to worry about the issues addressed in the  
13 letter for months now.

14 4.312 Plaintiff still does not know what information Equifax is reporting  
15 on his credit report.

16 4.313 This has caused Plaintiff and his spouse extreme anxiety, frustration,  
17 worry, anger, and other mental anguish and severe emotional distress.

18 4.314 Defendant could have easily allayed Plaintiff's stresses by simply  
19 providing Plaintiff with an updated copy of his consumer credit report illustrating  
20 that his credit information was not compromised.

21 4.315 However, to date, Defendant has refused to do so.

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22 <sup>49</sup> Exhibit 34.

1 **V. FIRST CAUSE OF ACTION**

2 **(Federal Fair Credit Reporting Act Violation – 15 U.S.C. §1681e(b))**

3 5.1 Plaintiff re-alleges sections I through IV, inclusive as though fully  
4 set forth herein.

5  
6 5.2 Defendant violated 15 U.S.C. §1681e(b) by failing to establish or to  
7 follow reasonable procedures to assure maximum possible accuracy in the  
8 preparation of the credit reports and credit files Defendant published and  
9 maintain concerning Plaintiff.

10  
11 5.3 As a result of this conduct, action and inaction of Defendant,  
12 Plaintiff suffered damage, and continues to suffer, actual damages, including  
13 economic loss, damage to reputation, emotional distress and interference with  
14 Plaintiff's normal and usual activities for which Plaintiff seeks damages in an  
15 amount to be determined by the jury.

16  
17  
18 5.4 Defendant's conduct, action and inaction were willful, rendering  
19 Defendant liable to Plaintiff for punitive damages pursuant to 15 U.S.C. §1681n.

20  
21 5.5 In the alternative, Defendant was negligent, entitling Plaintiff to  
22 recover damages under 15 U.S.C. §1681o.

23  
24 5.6 Plaintiff is entitled to recover costs and attorneys' fees from  
25 Defendant pursuant to 15 U.S.C. §1681n and/or 15 U.S.C. §1681o.

**VI. SECOND CAUSE OF ACTION**

**(Federal Fair Credit Reporting Act Violation – 15 U.S.C. §1681i)**

6.1 Plaintiff re-alleges sections I through V, inclusive as though fully set forth herein.

6.2 Defendant violated 15 U.S.C. §1681i by failing to delete inaccurate information in Plaintiff’s credit files after receiving actual notice of such inaccuracies, by failing to conduct lawful reinvestigations, by falsely verifying accounts that do not belong to Plaintiff, and by failing to maintain reasonable procedures with which to filter and verify disputed information in Plaintiff’s credit files.

6.3 As a result of this conduct, action and inaction of Defendant, Plaintiff suffered damage, and continues to suffer, actual damages, including economic loss, damage to reputation, emotional distress and interference with Plaintiff’s normal and usual activities for which Plaintiff seeks damages in an amount to be determined by the jury.

6.4 Defendant’ conduct, action and inaction were willful, rendering Defendant liable to Plaintiff for punitive damages pursuant to 15 U.S.C. §1681n.

6.5 In the alternative, Defendant was negligent, entitling Plaintiff to recover damages under 15 U.S.C. §1681o.

1 6.6 Plaintiff is entitled to recover costs and attorneys' fees from  
2 Defendant pursuant to 15 U.S.C. §1681n and/or 15 U.S.C. §1681o.  
3

4 **VII. THIRD CAUSE OF ACTION**

5 **(Federal Fair Credit Reporting Act Violation – 15 U.S.C. §1681g)**

6 7.1 Plaintiff re-alleges sections I through VI, inclusive as though fully  
7 set forth herein.

8 7.2 Defendant violated 15 U.S.C. §1681g by failing to clearly and  
9 accurately disclose to Plaintiff all information in Plaintiff's credit file at the time  
10 of Plaintiff's request for the same.  
11

12 7.3 As a result of this conduct, action and inaction of Defendant,  
13 Plaintiff suffered damage, and continues to suffer, actual damages, including  
14 economic loss, damage to reputation, emotional distress and interference with  
15 Plaintiff's normal and usual activities for which Plaintiff seeks damages in an  
16 amount to be determined by the jury.  
17

18 7.4 Defendant's conduct, action and inaction were willful, rendering it  
19 liable to Plaintiff for punitive damages pursuant to 15 U.S.C. §1681n.  
20

21 7.5 In the alternative, Defendant was negligent, entitling Plaintiff to  
22 recover damages under 15 U.S.C. §1681o.  
23

1 7.6 Plaintiff is entitled to recover costs and attorneys' fees from  
2 Defendant pursuant to 15 U.S.C. §1681n and/or 15 U.S.C. §1681o.  
3

4 **VIII. PRAYER FOR RELIEF**

5  
6 WHEREFORE, Plaintiff prays for judgment to be entered against  
7 Defendant as follows:

8 A. For Actual and Punitive damages in an amount to be proven at trial,  
9  
10 pursuant to 15 U.S.C. §1681 *et seq.*;

11 B. For Incidental and Consequential damages in an amount to be  
12 proven at trial;

13  
14 C. For costs and reasonable attorney's fees in an amount to be proven  
15 at trial pursuant to 15 U.S.C. §1681 *et seq.*;

16 D. For interest on the above amounts as authorized by law;

17 E. For other relief as the Court deems just and equitable;

18 F. For leave to amend this complaint as needed and as required; and

19 G. For leave to seek Civil Rule 23(b) status if information becomes  
20  
21 available through discovery supporting the need for class action status.  
22

23 //

24 //



**IX. REQUEST FOR TRIAL BY JURY**

Plaintiff hereby requests a trial by jury pursuant to U.S. Const. Amend. 7.

Dated this 27<sup>th</sup> day of October, 2015.

Respectfully submitted,

S//Robert Mitchell  
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Respectfully submitted,

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