

EXHIBIT A

Public Portal Access Civil**Case Summary****Case No. WY-2024-LM-003974****Christina M Jones vs. Trans Union, LLC**§
§
§Location: **Wyandotte County**Judicial Officer: **Alcaraz, Candice**Filed on: **06/21/2024**

Case Information

Case Type: **LM Other Tort**Case Status: **06/24/2024 Pending**

Party Information

Plaintiff**Jones, Christina M****Stecklein, Alan J*****Retained*****Robertson, Matthew Sugaya*****Retained*****Defendant****Trans Union, LLC**

Case Events

06/21/2024



Index # 1

PLE: Limited Action Petition Prayer Amount > 5,000.01

Petition

Party: Plaintiff Jones, Christina M

Petition

06/21/2024



Index # 2

PLE: Summons - Chapter 61

Summons

Party: Plaintiff Jones, Christina M

Summons

07/03/2024



Index # 3

RET: Return of Service - Summons

RETURN OF SERVICE OF DEFENDANT TRANS UNION LLC

Hearings

07/22/2024 **Answer Hearing** (9:00 AM) (Judicial Officer: Alcaraz, Candice)

Financial Information

Plaintiff Jones, Christina M

Total Financial Assessment 120.00

Total Payments and Credits 120.00

Balance Due as of 07/08/2024 0.00

06/24/2024 Transaction Assessment 120.00

06/24/2024	ePayment	Receipt # OJA-2024-733990	(120.00)
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ELECTRONICALLY FILED
2024 Jun 21 PM 2:55
CLERK OF THE WYANDOTTE COUNTY DISTRICT COURT
CASE NUMBER: WY-2024-LM-003974
PII COMPLIANT

IN THE 29th JUDICIAL DISTRICT
DISTRICT COURT OF WYANDOTTE COUNTY, KANSAS

Christina Jones, Plaintiff

(Address)

v.

CASE NO. WY-2024-LM-003974

Trans Union, LLC, Defendant

Defendant's Name and Address:

Trans Union, LLC

THE PRENTICE-HALL CORPORATION

SYSTEM, KANSAS, INC.

2900 SW WANAMAKER DRIVE SUITE 204

Topkea, KS 66601

Pursuant to Chapter 61 of Kansas Statutes Annotated

Type of Service Requested: Authorized Alternative by Attorney

SUMMONS

To the above-named Defendant:

You are notified that a lawsuit has been filed against you. This Summons is your notice that you must file a written answer or appear in Court in response to the attached Petition.

A hearing will be held at 09:00 AM (time) on 07/22/2024 (date), at Wyandotte County District Court, 710 N. 7th St. Kansas City, KS 66101 (place of hearing and address).

If you wish to contest this lawsuit, you must:

1. File a written answer before the scheduled hearing. If you file a written answer before the scheduled hearing, you are not required to appear at the hearing.

OR

2. Appear in person or by counsel at the scheduled hearing. If you appear at that time and dispute the petition, you must file a written answer with the Clerk of this Court within 14 days thereafter.

If you fail to answer or appear as described in paragraphs 1 or 2, then the judge may enter a judgment by default against you that grants the relief demanded in the Petition.

Your written answer:

- a. **must** describe the information in the Petition that you dispute;
- b. **must** list any affirmative defenses you have to the claims in the Petition;
- c. **may** explain any claim you have against the Plaintiff which is part of the same transaction or occurrence (which means the same event or circumstance) that is listed in the Petition and **must** explain this claim when required by K.S.A. 61-2905; and
- c. **must** include your current address, phone number, fax number (if you have one), and e-mail address.

If you are not represented by an attorney, you must:

- A. sign the written answer;
- B. file the written answer with the Clerk of the District Court; and
- C. promptly send a copy of the written answer to Plaintiff's attorney, or to Plaintiff if the Plaintiff does not have an attorney, at the following address:

Alan J Stecklein

(Attorney's name or Plaintiff's name)

1503 Westport Road

Kansas City, KS 64111

(Attorney's address or Plaintiff's address)

To the Sheriff or Process Server:

This Summons must be served and your return of service made promptly. Your return is due no later than five days before the hearing date stated on this Summons.



Kristi L. Hill

Morgan Weakley
Clerk or Deputy

Documents to be served with the Summons

PLE: Limited Action Petition Prayer Amount 5,000.01-25,000 Petition

ELECTRONICALLY FILED

2024 Jun 21 PM 2:55

CLERK OF THE WYANDOTTE COUNTY DISTRICT COURT

CASE NUMBER: WY-2024-LM-003974

PII COMPLIANT

**IN THE DISTRICT COURT OF WYANDOTTE COUNTY, KANSAS
LIMITED ACTIONS DIVISION**

CHRISTINA M. JONES,

Plaintiff,

vs.

TRANS UNION, LLC,

Defendant.

Case Number: _____

Division: _____

Chapter. 61

PETITION

COMES NOW Plaintiff Christina Jones (“Plaintiff”), by and through counsel, and for Plaintiff’s causes of action against Defendant Trans Union, LLC (“Defendant”) states as follows:

INTRODUCTION

1. Plaintiff Christina Jones brings this action for violations of the federal Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (“FCRA”) by Defendant Trans Union, LLC.

2. This action arises from Defendant’s furnishing Plaintiff’s consumer report to a nonparty, without reason to believe that the person it was furnishing Plaintiff’s consumer report to had a permissible purpose.

3. In enacting the FCRA, Congress limited the purposes by which users could legitimately use or obtain consumer reports, with the intention of preventing invasion of consumers’ right to privacy.

4. This same section also precludes a consumer reporting agency (“CRA”) like Trans Union from furnishing a consumer report to any person without a reason to believe that the person intends to use that consumer for a purpose authorized by the statute.

5. An invasion of consumers' privacy is among the harms that Congress identified and sought to prevent by passing the FCRA. *See* 15 U.S.C. § 1681(a)(4).

JURISDICTION AND VENUE

6. Jurisdiction of this Court arises under 15 U.S.C. § 1681p and 28 U.S.C. § 1331.

7. Venue lies properly in this district pursuant to 28 U.S.C. § 1391(b).

THE PARTIES

8. Plaintiff Christina Jones is a citizen of the State of Kansas.

9. Defendant Trans Union, LLC is an Illinois corporation.

10. Defendant Trans Union, LLC is a "consumer reporting agency" as that term is defined in the FCRA.

11. Defendant was and is engaged in the business of reporting consumer credit information in the State of Kansas.

12. At all times pertinent hereto, the Plaintiff was a "consumer" as that term is defined by 15 U.S.C. § 1681a(c).

FACTS

13. Plaintiff incorporates the preceding allegations as if set forth at length herein.

14. In November 2023, Plaintiff Christina Jones received a text on her cell phone from a person who identified herself as Cristina Jones.

15. Cristina Jones indicated to Plaintiff that she had procured a Trans Union credit report purported to be for Cristina Jones and the credit report contained a lot of credit information that did not belong to her.

16. When Cristina Jones contacted Plaintiff Christina Jones via the information in the credit report, Plaintiff confirmed that it was her information merged onto the other Cristina Jones

Trans Union report.

17. When Plaintiff secured her Trans Union credit report, she noted a Capital One account with an account number beginning in 46883***** that did not belong to Plaintiff.

18. On November 27, 2023, Plaintiff disputed the merged information to Trans Union.

19. On December 12, 2023, Plaintiff received a notice from Capital One that its investigation concluded that she was not responsible for the account and that Capital One would notify Trans Union to remove the account from her credit report.

20. The obligation to furnish consumer reports to persons that a CRA has reason to believe intends to use or obtain that report for a permissible purpose is well established in the plain language of the FCRA and in the promulgations of the Federal Trade Commission and the Consumer Financial Protection Bureau.

21. Defendant either procured, or had available to it, substantial written materials that informed it of its duties under the FCRA.

22. At all times pertinent hereto, Defendant was acting by and through their agents, servants and/or employees who were acting within the course and scope of their agency or employment, and under the direct supervision and control of the Defendant herein.

23. At all times pertinent hereto, the conduct of the Defendant as well as that of its agents, servants and/or employees, was malicious, intentional, willful, reckless, and in grossly negligent disregard for federal and state laws and the rights of the Plaintiff herein.

24. As part of Defendant's furnishing Plaintiff's consumer report to a nonparty, it furnished information bearing on Plaintiff's credit worthiness, credit standing, and/or credit capacity, and included information about Plaintiff's open and closed accounts and other financial and personal information.

25. At the time of the aforementioned furnishing of Plaintiff's consumer report, Plaintiff did not provide consent or written instruction allowing Defendant to obtain or use his consumer report.

26. The furnishing of Plaintiff's consumer report by Defendant to a person whom it did not have reason to believe should receive such report, was an invasion of the Plaintiff's privacy, and was willfully, recklessly and/or negligently in violation of the Fair Credit Reporting Act.

Count I
Violation of the Fair Credit Reporting Act
15 U.S.C. § 1681 et seq

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

28. Defendant violated 15 U.S.C. § 1681b by willfully and/or recklessly furnishing a consumer report to a nonparty individual when Defendant did not have reason to believe that the individual would use the information for any of the enumerated purposes of the statute.

29. Defendant violated 15 U.S.C. § 1681n by negligently furnishing Plaintiff's consumer report without a permissible purpose or authorization under the FCRA.

30. Defendant violated 15 U.S.C. § 1681o by willfully and/or recklessly furnishing Plaintiff's consumer report without a permissible purpose or authorization under the FCRA.

31. Trans Union did not have procedures in place, as required by 15 U.S.C. § 1681e(b), to have reasonable procedures to assure maximum possible accuracy to prevent such reporting of inaccurate information in Plaintiff's reports and Plaintiff's information on another person with a similar name.

32. As a result of Defendant's conduct, a nonparty individual with whom Plaintiff

has no connection or relationship used or obtained Plaintiff's confidential and financial information contained in her consumer report.

33. As a result of Defendant's conduct, Plaintiff's right to privacy in her confidential and financial information was invaded and Plaintiff has suffered actual damages.

34. As a result of the above violations of the FCRA, the Defendant is liable to the Plaintiff in the sum of Plaintiff's actual damages, statutory damages, punitive damages, costs, disbursements, and reasonable attorney's fees.

WHEREFORE, Plaintiff respectfully prays that judgment be entered against the Defendant Trans Union, LLC for actual damages; punitive damages, statutory damages pursuant to 15 U.S.C. §1692k; costs and reasonable attorney's fees pursuant to 15 U.S.C. § 1692k; and for such other and further relief as may be just and proper.

Respectfully submitted,

By: /s/ A.J. Stecklein

A.J. Stecklein KS Bar #16330

Matthew S. Robertson KS Bar #27254

STECKLEIN ROBERTSON LAW, CHTD.

1503 Westport Road

Kansas City, Missouri 64111

Telephone: (913) 371-0727

Facsimile: (913) 371-0727

Email: aj@srlawkc.com

msr@srlawkc.com

Attorneys for Plaintiff

ELECTRONICALLY FILED

2024 Jul 03 PM 2:23

CLERK OF THE WYANDOTTE COUNTY DISTRICT COURT

CASE NUMBER: WY-2024-LM-003974

PII COMPLIANT

**IN THE DISTRICT COURT OF WYANDOTTE COUNTY, KANSAS
LIMITED ACTIONS DEPARTMENT**

CHRISTINA M. JONES,

Plaintiff,

vs.

Case Number: WY-2024-LM-003974

TRANS UNION LLC,

Defendant.

RETURN OF SERVICE OF DEFENDANT TRANS UNION LLC

I hereby certify that a Petition and Summons was served upon Defendant Trans Union LLC, on July 2, 2024, in the above-captioned matter. Service was made by certified mail, electronic return receipt requested, upon Defendant Trans Union LLC, by serving its registered agent: The Prentice Hall Corporation System, Kansas, Inc., 1100 SW Wanamaker Road, Suite 28, Topeka, Kansas 66604.

A copy of the United States Postal Service delivery receipt is attached hereto.

Respectfully submitted,

By: /s/ Matthew Robertson

A.J. Stecklein #16330

Matthew S. Robertson #27254

STECKLEIN ROBERTSON LAW, CHTD

1503 Westport Road

Kansas City, Missouri 64111

Telephone: 913-371-0727

Facsimile: 913-371-0727

Email: aj@srlawkc.com

msr@srlawkc.com

Attorneys for Plaintiff

CERTIFICATE OF FILING

I hereby certify that the foregoing document was filed electronically with the United States District Court on July 3, 2024, which will automatically generate notice of filing to all counsel of record.

/s/ Matthew S. Robertson
Matthew S. Robertson #27254



July 3, 2024

Dear Anne Lamoy:

The following is in response to your request for proof of delivery on your item with the tracking number:
9214 8901 3247 3400 2044 6801 77.

Item Details

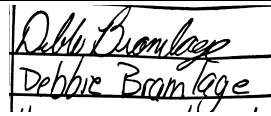
Status:	Delivered, Left with Individual
Status Date / Time:	July 2, 2024, 11:10 am
Location:	TOPEKA, KS 66604
Postal Product:	First-Class Mail®
Extra Services:	Certified Mail™ Return Receipt Electronic
Recipient Name:	Registered Agent The Prentice Hall Corp

Destination Delivery Address

Street Address:	1100 SW WANAMAKER RD STE 28
City, State ZIP Code:	TOPEKA, KS 66604-3805

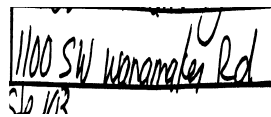
Recipient Signature

Signature of Recipient:



Debbie Bramlage

Address of Recipient:



1100 SW Wanamaker Rd
Ste 28

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,
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475 L'Enfant Plaza SW
Washington, D.C. 20260-0004