UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO, EASTERN DIVISION

Soretha M. Eldridge v. Equifax Information Services, LLC

Eldridge · No. 1:25 CV 1908 · Decided December 10, 2025

SUMMARY

The United States District Court for the Northern District of Ohio dismissed Soretha M. Eldridge's pro se action against Equifax Information Services, LLC under the Fair Credit Reporting Act and 18 U.S.C. § 1595. The court granted in forma pauperis status but dismissed the complaint under 28 U.S.C. § 1915(e) because it lacked factual allegations sufficient to satisfy Federal Rule of Civil Procedure 8.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Pamela A. Barker
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	December 10, 2025
DOCKET	1:25 CV 1908
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff filed a pro se action under the Fair Credit Reporting Act and 18 U.S.C. § 1595, along with an application to proceed in forma pauperis. The district court granted the in forma pauperis application and dismissed the action during statutory screening for failure to state a claim and failure to satisfy Federal Rule of Civil Procedure 8.
STANDARD OF REVIEW	For an action filed in forma pauperis, the court must dismiss under 28 U.S.C. § 1915(e) if the action fails to state a claim or lacks an arguable basis in law or fact. Pro se pleadings are liberally construed, but the complaint must satisfy the plausibility and fair-notice requirements of Federal Rule of Civil Procedure 8.
PRECEDENTIAL VALUE	unpublished district court memorandum; precedential status unknown

TOPICS

pleadings civil procedure consumer protection credit reporting

PRACTICE AREAS

consumer protection civil procedure fair credit reporting

QUESTIONS PRESENTED

1. Whether the complaint satisfied Federal Rule of Civil Procedure 8 by providing fair notice of the legal claims and the factual grounds supporting them.
2. Whether the complaint stated a plausible claim under 15 U.S.C. § 1681c-2.
3. Whether the action was subject to dismissal under 28 U.S.C. § 1915(e) for failure to state a claim.

HOLDINGS

1. The complaint failed to satisfy Rule 8 because it did not provide factual allegations sufficient to give Equifax fair notice of the claims or the grounds on which they rested.
2. The complaint did not state a claim under § 1681c-2 because it did not allege facts showing what information was subject to a statutory block request, how the request was made, or why Equifax's conduct violated the statute.
3. The action was dismissed under § 1915(e) for failure to state a claim.

KEY QUOTATIONS

> *"Without factual allegations, the Complaint does not meet the minimum pleading requirements of Federal Civil Procedure Rule 8."* (at 3)

> *"The Court certifies, pursuant to 28 U.S.C. § 1915(a)(3), that an appeal from this decision could not be taken in good faith."* (at 4)

FACTUAL BACKGROUND

Eldridge alleged that she was a survivor of human trafficking and that Equifax repeatedly refused to honor her claimed trafficking-victim status, causing emotional distress and financial harm. She asserted that Equifax rejected her self-attestation letters and failed to block fraudulent accounts within required timeframes, but she did not identify the debts, explain how she disputed them, or state the reason Equifax gave for not blocking them.

PROCEDURAL HISTORY

Eldridge sued Equifax Information Services, LLC, alleging that Equifax failed to block accounts she claimed were related to her status as a survivor of human trafficking. The complaint contained no factual allegations identifying the disputed debts, the manner of dispute, or Equifax's reasons for refusing to block the accounts. The court granted in forma pauperis status, dismissed the action under 28 U.S.C. § 1915(e), and certified that an appeal could not be taken in good faith.

DISPOSITION

dismissed

CASES CITED

- Boag v. MacDougall, 454 U.S. 364, 365 (1982) (per curiam)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Neitzke v. Williams, 490 U.S. (1989); Neitzke, 490 U.S. at 327
- Lawler v. Marshall, 898 F.2d 1196 (6th Cir. 1990)
- Sistrunk v. City of Strongsville, 99 F.3d 194, 197 (6th Cir. 1996)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 564 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 677-78 (2009)
- Bibbo v. Dean Witter Reynolds, Inc., 151 F.3d 559, 561 (6th Cir. 1998)
- Bassett v. National Collegiate Athletic Ass’n, 528 F.3d 426, 437 (6th Cir. 2008)

OPINION

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION Soretha M. Eldridge,) CASE NO. 1:25 CV 1908) Plaintiff,) JUDGE PAMELA A. BARKER) v.)) Memorandum of Opinion and Order Equifax Information Services, LLC,)) Defendant.) INTRODUCTION Pro se Plaintiff Soretha M. Eldridge filed this action under the Fair Credit Reporting Act, 15 U.S.C. § 1681c-2, and 18 U.S.C. § 1595 against Equifax Information Services, LLC. The Complaint contains no factual information.

She states that she is a survivor of human trafficking and “Equifax has repeatedly re-victimized [her] by refusing to consistently honor her federally-protected trafficking victim status, causing severe emotional distress and financial harm.” (Doc. No. 1 at PageID #: 2). She contends the Defendant rejected her “self- attestation letters” and “fail[ed] to block fraudulent accounts within required timeframes.” (Doc.

No. 1 at PageID #: 2). She asserts “dozens of separate willful violations of 15 U.S.C. § 1681c-2 over two years.” (Doc. No. 1 at PageID #: 3). She seeks monetary damages under 18 U.S.C. § 1595 stating that the statute permits victims of human trafficking to recover 1 damages from those who knowingly benefitted from trafficking related harm. She seeks monetary damages in excess of one million dollars.

Plaintiff also filed an Application to Proceed In Forma Pauperis. (Doc No. 2). That Application is granted. STANDARD OF REVIEW Although pro se pleadings are liberally construed, Boag v. MacDougall, 454 U.S. 364, 365 (1982) (per curiam); Haines v. Kerner, 404 U.S. 519, 520 (1972), the Court is required to dismiss an in forma pauperis action under 28 U.S.C. §1915(e) if it fails to state a claim upon which relief can be granted, or if it lacks an arguable basis in law or fact.

Neitzke v. Williams, 490 U.S (1989); Lawler v. Marshall, 898 F.2d 1196 (6th Cir. 1990); Sistrunk v. City of Strongsville, 99 F.3d 194, 197 (6th Cir. 1996). A claim lacks an arguable basis in law or fact when it is premised on an indisputably meritless legal theory or when the factual contentions are clearly baseless. Neitzke, 490 U.S. at 327. A cause of action fails to state a claim upon which relief may be granted when it lacks "plausibility in the Complaint." Bell Atl.

Corp. v. Twombly, 550 U.S. 544, 564 (2007). A pleading must contain a "short and plain statement of the claim showing that the pleader is entitled to relief." Ashcroft v. Iqbal, 556 U.S. 662, 677-78 (2009). The factual allegations in the pleading must be sufficient to raise the right to relief above the speculative level on the assumption that all the allegations in the Complaint are true.

Bell Atl. Corp., 550 U.S. at 555. The Plaintiff is not required to include detailed factual allegations, but must provide more than "an unadorned, the-Defendant-unlawfully-harmed-me accusation." Iqbal, 556 U.S. at 678. A pleading that offers legal conclusions or a simple recitation of the elements of a cause of action will not meet this pleading standard. Id. In reviewing a Complaint, the 2 Court must construe the pleading in the light most favorable to the Plaintiff.

Bibbo v. Dean Witter Reynolds, Inc., 151 F.3d 559, 561 (6th Cir. 1998). DISCUSSION Plaintiff's Complaint fails to meet the minimum pleading requirements of Federal Civil Procedure Rule 8. To meet the minimum pleading requirements, the Complaint must give the Defendant fair notice of what the Plaintiff's legal claims are and the factual grounds upon which they rest.

Bassett v. National Collegiate Athletic Ass'n, 528 F.3d 426, 437 (6th Cir. 2008). Plaintiff cites to 15 U.S.C.A. § 1681c-2 as the legal basis for her Complaint. This statute makes no mention of a human trafficking exception to consumer reporting. Instead, it requires a consumer credit reporting agency to block information that the consumer identifies as information that resulted from an alleged identity theft.

15 U.S.C.A. § 1681c- 2(a). The agency then notifies the furnisher of information that the information may be a result of identity theft; that an identity theft report has been filed; and that a block has been requested by the consumer. 15 U.S.C.A. § 1681c-2(b).

The consumer credit reporting agency may decline to block information relating to a consumer if it reasonably determines that the information was blocked in error or a block was requested by the consumer in error; if the information was blocked or requested to be blocked by the consumer on the basis of a material misrepresentation of fact; or if it determines that the consumer obtained possession of goods, services, or money as a result of the blocked transaction.

15 U.S.C.A. § 1681c- 2(c)(1). Here, Plaintiff does not provide any factual allegations with regard to a claim under § 1681c-2. She does not indicate which debt or debts she is disputing, how she disputed 3 them with the Defendant, or what reason the Defendant gave for not blocking the

accounts. Her Complaint is stated solely as a legal conclusion. Without factual allegations, the Complaint does not meet the minimum pleading requirements of Federal Civil Procedure Rule 8.

CONCLUSION Accordingly, Plaintiff's Application to Proceed In Forma Pauperis (Doc No. 2) is granted and this action is dismissed pursuant to 28 U.S.C. §1915(e). The Court certifies, pursuant to 28 U.S.C. § 1915(a)(3), that an appeal from this decision could not be taken in good faith. IT IS SO ORDERED. s/Pamela A. Barker PAMELA A. BARKER Date: December 10, 2025 U. S. DISTRICT JUDGE 4