

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PRECEDENTIAL VALUE	unpublished district court memorandum; precedential status unknown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

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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)

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