

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

SHANNON MARIE MILLER,

Plaintiff,

v.

STERLING INFOSYSTEMS, INC.,

Defendant.

Case No.:

**JURY TRIAL DEMANDED**

**COMPLAINT**

Shannon Marie Miller (“Plaintiff” or “Ms. Miller”) by and through her counsel brings the following Complaint against Sterling Infosystems, Inc. (“Defendant” or “Sterling”) for violations of the federal Fair Credit Reporting Act (“FCRA”), 15 U.S.C. §§ 1681, *et seq.*, arising out of an employment background check report that Defendant published to Plaintiff’s potential employer, which falsely portrayed Plaintiff as having a criminal record and active warrant for her arrest.

**INTRODUCTION**

1. This is an individual action for damages, costs, and attorney’s fees brought against Defendant pursuant to the Fair Credit Reporting Act, 15 U.S.C. §§ 1681, *et seq.* (“FCRA”).

2. Defendant is a consumer reporting agency that compiles and maintains files on consumers on a nationwide basis. It sells consumer reports generated from its database and furnishes these consumer reports to employers who use the reports to make decisions regarding whether to offer employment to certain consumers.

3. Defendant falsely reported to Plaintiff's prospective employer that Plaintiff has a criminal record and active warrant for her arrest. Defendant's reporting is grossly inaccurate and untrue.

4. Plaintiff has never been charged with or convicted of any crime in her entire life.

5. Plaintiff's prospective employer denied Plaintiff's job application after receiving an employment background check report from Defendant, which included the inaccurate criminal record and disposition, which does not belong to Plaintiff.

6. Defendant's inaccurate reporting could have easily been avoided had Defendant reviewed the widely available public court records from Cecil County, Maryland regarding the criminal record at issue under Case No. 0K00076230 prior to publishing Plaintiff's report to her prospective employer.

7. Had Defendant performed even a cursory review of the public court records, it would have discovered that the criminal record belongs to a different consumer who is wholly distinguishable from Plaintiff by their middle name, race, and having a different address from Plaintiff.

8. Defendant does not employ reasonable procedures to assure the maximum possible accuracy of the information it reports regarding consumers. Defendant's failure to employ reasonable procedures resulted in Plaintiff's report being grossly inaccurate.

9. Defendant committed these violations pursuant to its standard policies and practices, which harm innocent consumers seeking employment by prejudicing their prospective employers with inaccurate criminal record information.

10. Defendant's inaccurate report caused Plaintiff a significant delay in obtaining a good paying job and job security.

11. As a result of Defendant's violations of the FCRA, Plaintiff has suffered a range of actual damages including, without limitation, temporary loss of employment opportunities, wages, and benefits; loss of economic opportunities and positions and advancements in the future; loss of time and money trying to correct her background check report; the expenditure of labor and effort disputing and trying to correct the inaccurate reporting; damage to her reputation; loss of sleep; lasting psychological damage; loss of capacity for enjoyment of life; and emotional distress, including mental anguish, anxiety, fear, frustration, humiliation, and embarrassment.

12. As a result of Defendant's conduct, action, and inaction, Plaintiff brings claims against Defendant for failing to follow reasonable procedures to assure maximum possible accuracy based on 15 U.S.C. § 1681e(b) of the FCRA.

### **PARTIES**

13. Shannon Marie Miller ("Plaintiff" or "Ms. Marie Miller") is a natural person residing in Perryville, Maryland, and is a "consumer" as that term is defined in 15 U.S.C. § 1681a(c).

14. Defendant Sterling Infosystems, Inc. ("Defendant" or "Sterling") is an Ohio corporation doing business throughout the United States, including the State of Maryland and in this District, and has a principal place of business located at 6150 Oak Tree Boulevard, Suite 490, Independence, Ohio 44131. Defendant can be served at its registered agent for service Paracorp Incorporated at 245 West Chase Street Baltimore, MD 21201.

15. Among other things, Defendant sells background checks to employers for their use in deciding whether to offer employment to prospective employees or to take adverse action such as termination, failure to hire, or failure to promote. These reports are provided in connection with a business transaction initiated by the employer.

16. Defendant is a consumer reporting agency as defined in 15 U.S.C. § 1681a(f) because for monetary fees, it regularly engages in the practice of evaluating and/or assembling information on consumers for the purpose of furnishing consumer reports for employment purposes to third parties, and uses interstate commerce, including the Internet, for the purpose of preparing and furnishing such consumer reports.

### **JURISDICTION AND VENUE**

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

18. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to Plaintiff's claims occurred in this District.

### **STATUTORY BACKGROUND**

19. Enacted in 1970, the FCRA's passage was driven in part by two related concerns: first, that consumer reports were playing a central role in people's lives at crucial moments, such as when they applied for a job or credit, and when they applied for housing. Second, despite their importance, consumer reports were unregulated and had widespread errors and inaccuracies.

20. While recognizing that consumer reports play an important role in the economy, Congress wanted consumer reports to be "fair and equitable to the consumer" and to ensure "the confidentiality, accuracy, relevancy, and proper utilization" of consumer reports. 15 U.S.C. § 1681.

21. Congress, concerned about inaccuracies in consumer reports, specifically required consumer reporting agencies to follow "reasonable procedures to assure maximum possible accuracy" in consumer reports. 15 U.S.C. § 1681e(b).

22. Consumer reports that contain factually incorrect information which does not belong to the consumer at issue are neither maximally accurate nor fair to the consumers who are the subjects of such reports.

**THE FCRA'S PROTECTIONS FOR JOB APPLICANTS**

23. Despite its name, the Fair Credit Reporting Act covers more than just credit reporting, it also regulates employment background check reports like the one Defendant prepared in Plaintiff's name.

24. The FCRA provides a number of protections for job applicants who are the subject of background checks for purposes of securing employment, housing, and other purposes.

25. In the parlance of the FCRA, background checks are "consumer reports," and providers of background checks, like Defendant, are "consumer reporting agencies." 15 U.S.C. §§ 1681a(d) and (f).

26. The FCRA imposes duties on consumer reporting agencies to assure that consumer reports are accurate and that "consumer reporting agencies exercise their grave responsibilities with fairness, impartiality, and a respect for the consumer's right to privacy." 15 U.S.C. § 1681.

27. Under 15 U.S.C. § 1681e(b), consumer reporting agencies are required "to follow reasonable procedures to assure maximum possible accuracy of the information concerning the individual about whom the report relates."

28. Defendant disregarded its duties under the FCRA with respect to Plaintiff's background check report.

**DEFENDANT’S ILLEGAL BUSINESS PRACTICES**

29. Over the past 15 years, there has been increased collection and aggregation of consumer data, including criminal records and sex offender registration data. As a result of the increasing availability of this data, there has been a boom in the background check industry.

30. As summarized in a recent report by the Consumer Financial Protection Bureau<sup>1</sup>, a 2018 survey of employers found that 95 percent of employers surveyed conducted one or more types of background screening. CFPB Report at 4.

31. The criminal background check industry takes in revenues in excess of four billion dollars, annually.<sup>2</sup>

32. Criminal background checks are generally created by running automated searches through giant databases of aggregated criminal record data. The reports are created and disseminated with little to no manual, in-person review, and the court records are rarely directly reviewed in creating criminal background checks.

33. Background check companies, like Defendant, collect millions of criminal records from a number of sources with data from county, state, and federal level sources. The data included on the reports is often not obtained directly from court records on an individual basis but instead is purchased in bulk or scraped from court websites.

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<sup>1</sup> CFPB, Market Snapshot: Background Screening Reports (Oct. 2019), [https://files.consumerfinance.gov/f/documents/201909\\_cfpb\\_market-snapshot-background-screening\\_report.pdf](https://files.consumerfinance.gov/f/documents/201909_cfpb_market-snapshot-background-screening_report.pdf) (“CFPB Report”).

<sup>2</sup> IBISWorld, Inc., *Background Check Services in the US - Market Research Report (2014-2029)*, available at <https://www.ibisworld.com/united-states/market-research-reports/background-check-services-industry/>

34. Given that Defendant is in the business of selling background checks, Defendant should be well aware of the FCRA and the attendant harm to consumers for reporting inaccurate or outdated information.

35. Defendant places its business interests above the rights of consumers and reports such inaccurate information because it is cheaper for Defendant to produce reports containing information that is inaccurate and incomplete than it is for Defendant to exert proper quality control over the reports prior to their being provided to Defendant's customers.

36. Defendant reports such erroneous and incomplete information because it wants to maximize the automation of its report creation process, thereby saving the costs associated with conducting the additional review necessary to remove the inaccurate or out-of-date entries.

37. Defendant charges its customers the same price for reports that are grossly inaccurate as it does for accurate reports.

38. Appropriate quality control review of Plaintiff's report would have made clear that Defendant was reporting a criminal record and "arrest warrant" disposition that belongs to an unrelated consumer who has no middle name (although Plaintiff does), is a different race than Plaintiff, and has a different address than Plaintiff.

39. As a provider of background check reports, Defendant should be aware of the FCRA requirements and is a member of the Professional Background Screening Association ("PBSA") and has had several executives hold significant roles within the organization. PBSA hosts a conference at least once a year where presenters discuss compliance with federal and state consumer reporting laws.

**FACTS**

**Plaintiff Applies for a Job with Great Wolf Lodge**

40. On or about October 22, 2024, Plaintiff applied for a part-time employment as a restaurant Cook with Great Wolf Lodge, located in Perryville, Maryland. The position starts out as a part-time position at approximately 30 hours of work a week, paid \$22.00 an hour, and offered a competitive benefits package.

41. Upon applying to Great Wolf Lodge, Plaintiff successfully completed an interview and passed a drug test. Plaintiff also provided Great Wolf Lodge with her driver's license and social security card.

42. On or about November 1, 2024, Great Wolf Lodge extended a job offer to Plaintiff for the position to which she applied. The job offer was conditioned upon Plaintiff passing a background check ("consumer report"). The prospective start date for the position was November 14, 2024.

**Defendant Published an Inaccurate Background Check Report to Great Wolf Lodge**

43. Great Wolf Lodge contracted with Defendant to conduct background checks, including criminal background checks, on its prospective employees.

44. On or about November 1, 2024, Great Wolf Lodge ordered a criminal background check on Plaintiff from Defendant.

45. On or about November 5, 2024, in accordance with its standard procedures, Defendant completed its consumer report about Plaintiff and sold the same to Great Wolf Lodge.

46. Within that consumer report, Defendant published inaccurate information about Plaintiff.



47. Specifically, Defendant’s consumer report about Plaintiff included a grossly inaccurate and stigmatizing criminal record and “arrest warrant” disposition from Cecil County, Maryland, which appeared in the consumer report as follows:

| County Court Search—Miller, Shannon Marie, MD-CECIL |                 | CONSIDER   |
|---|-----------------|--|
| <b>Data As Provided</b>                             |                 | <b>Verified Data</b>   |
| Last Name   | Miller          | Report requested on: 2024-11-01<br>Report completed on: 2024-11-04 |
| First Name  | Shannon         | Case Number 0k00076230   |
| Middle Name   | Marie           | File Date 2016-05-16   |
| SSN   | [REDACTED]      | Last Name miller   |
| DOB   | XXXX-04-04      | First Name shannon   |
| Race  | Unknown         | Case Type Not Disposed   |
| Gender  | Unknown         | Case Level Unknown   |
| Jurisdiction  | MD-CECIL (1201) | Additional Info Address : 203 E Main St, Elkton, 21921, md US      |
|   |                 | <b>Charges</b>   |
|   |                 | Type Not listed  |
|   |                 | Original Charge XX   |
|   |                 | Disposition ACTIVE WARRANT   |

48. The criminal record reported by Defendant about Plaintiff to Great Wolf Lodge *does not* belong to Plaintiff.

49. Plaintiff has never been charged with or convicted of any crime in her entire life.

50. A cursory review of the widely available public court records confirms that the record belong to an unrelated female, Shannon Miller (“Accused Miller”).

51. Had Defendant actually consulted or obtained the widely available public court records regarding the criminal record with Case No. 0k00076230, it would have seen obvious discrepancies between Accused Miller and Plaintiff.

52. The discrepancies that should have caused Defendant to realize Plaintiff is not the same person as Accused Miller include the following:

- (a) Plaintiff's legal name is "Shannon Marie Miller", and the criminal records belong to a "Shannon Miller" (no middle name), which is both clearly indicated on the face of the consumer report and in the widely available public records from Cecil County, Maryland;
- (b) Plaintiff is white, and the underlying public court records show that Accused Miller is black;
- (c) Plaintiff has never been associated with the address located at 203 E Main Street, Elkton, MD; and
- (d) Plaintiff's Social Security number, which was provided to Defendant is different than that of the Accused Miller.

53. The sole reason the inaccurate criminal record was reported as belonging to Plaintiff was that Defendant failed to follow reasonable procedures to assure the maximum possible accuracy of the information it published within the consumer report it sold about Plaintiff to Plaintiff's prospective employer.

54. Had Defendant followed reasonable procedures, it would have discovered that the inaccurate, stigmatizing criminal record belongs to an unrelated individual with a different middle name than Plaintiff, a different race, a different Social Security Number, and residing at a different address from Plaintiff.

55. In preparing and selling a consumer report about Plaintiff, wherein Defendant published to Plaintiff's prospective employer inaccurate information about Plaintiff, Defendant

failed to follow reasonable procedures to assure that the report was as accurate as maximally possible, in violation of 15 U.S.C. § 1681e(b).

### **Great Wolf Lodge Denies Plaintiff's Job Application**

56. On or about November 4, 2024, Plaintiff was notified by Great Wolf Lodge that her employment application was denied as a direct result of information contained in Defendant's background check report about Plaintiff.

57. Shortly thereafter, Plaintiff contacted Great Wolf Lounge's Human Resources department to learn more about the reasons of her denial, but was unsuccessful.

58. On or about November 5, 2024, Plaintiff contacted Great Wolf Lounge again to inquire about the reasons for her denial, and this time she was directed to contact the Defendant for more information.

59. On or about November 5, 2024, Plaintiff received a Pre-Adverse Action Notice from Great Wolf Lounge, with an enclosed background report produced by Defendant.

60. The notice informed Plaintiff that Great Wolf Lounge was considering taking action based on information contained in a background report prepared by Defendant.

61. Great Wolf Lounge's Pre-Adverse Action Notice was clear that the criminal record from Cecil County, Maryland was the reason for Plaintiff's potential disqualification.

62. Shortly thereafter, Plaintiff obtained a copy of the subject consumer report and was shocked and humiliated upon reviewing and realizing that the criminal record of another, namely Accused Miller, was published in the consumer report Defendant sold about Plaintiff to Great Wolf Lodge.

63. Plaintiff contacted Great Wolf Lodge and informed them that she has never been charged with any crime and does not have an active warrant for her arrest. Plaintiff explained that the criminal record of Accused Miller does not belong to her.

64. Plaintiff was very panicked, confused, and concerned about the impact of Accused Miller's criminal record and arrest warrant reported on the subject consumer report – specifically, the impact of the same on her future.

65. Specifically, Defendant matched Plaintiff and Accused Miller and published the criminal record of Accused Miller onto the consumer report about Plaintiff and sold that report to Plaintiff's prospective employer. This exculpatory public record information was widely available to Defendant prior to publishing Plaintiff's consumer report to Great Wolf Lodge, but Defendant failed to perform even a cursory review of such information.

**Plaintiff Disputed the Misinformation in Defendant's Consumer Report**

66. On November 6, 2024, desperate to secure employment with Great Wolf Lodge and riddled with worry over the far-reaching impacts of being confused with a person with criminal record(s), Plaintiff disputed the inaccurate information with Defendant. Plaintiff disputed via Defendant's online portal.

67. Plaintiff identified herself and provided information to Defendant to support her dispute.

68. Plaintiff specifically disputed the criminal record of Accused Miller.

69. Plaintiff specifically stated that the criminal record of Accused Miller does not belong to Plaintiff.

70. Plaintiff specifically asked Defendant to investigate and delete Accused Miller's criminal record from any consumer report about Plaintiff.

71. On November 6, 2024, Plaintiff received Defendant's acknowledgement of her dispute.

72. On November 13, 2024, Plaintiff received Defendant's correspondence confirming that it had reinvestigated Plaintiff's dispute and removed the criminal record from the subject consumer report.

73. Defendant also communicated to Plaintiff that it had issued a corrected consumer report to Great Wolf Lodge.

74. Plaintiff continued to follow up with Great Wolf Lodge in the hopes that she could start working on November 14 as indicated in original job offer, however, Great Wolf Lodge did not proceed with the original onboarding date and renewed its offer with a new onboarding date of December 6, 2024.

75. Defendant's inaccurate reporting caused the delay of her employment with Great Wolf Lodge. Furthermore, Plaintiff was required to essentially go through the application process again with Great Wolf Lodge, which included completing all of the onboarding tasks and taking another drug test.

76. Defendant's false report temporarily cost Plaintiff a promising, well-paying job with Great Wolf Lodge.

77. Due to Defendant's unreasonable procedures, Plaintiff will remain unemployed for approximately three weeks, from November 14, 2024, to December 6, 2024.

78. Plaintiff has been unemployed for over 3 months due to the closure of her previous employer company. Plaintiff felt devastated and crushed as she struggled to find a new job. When she eventually received a job offer from Great Wolf Lodge, she was extremely happy and believed

that things were finally starting to improve. However, when this issue arose, she was devastated once again, and her renewed sense of optimism was quickly shattered.

79. Plaintiff is the main income earner in her household and is responsible for taking care of her daughter and grandson. Plaintiff often worries about how she will pay the bills and take care of her family while she remains unemployed.

80. Plaintiff's has been relegated to paying her bills late and has been making minimum credit card payments, which has resulted in Plaintiff suffering late fees and interest charges. Had Plaintiff started working at the initial November 14 start date, she would have avoided some of these late fees and interest charges.

81. Plaintiff was set to earn \$22.00 per hour with a competitive benefits package such as a 401k plan, culinary school lessons, and discounts at the lounge. More importantly, Plaintiff was excited to work as a Restaurant Cook because she was qualified to successfully perform the work, is passionate about the field, and was thrilled about the possibility of being back on her feet.

82. The injuries suffered by Plaintiff as a direct result of Defendant's erroneous reporting are the type of injuries that the FCRA was enacted to address. Under common law, Defendant's conduct would have given rise to causes of action based on defamation and invasion of privacy.

83. As a result of Defendant's violations of the FCRA, Plaintiff has suffered a range of actual damages including, without limitation, temporary loss of employment opportunities, wages, and benefits; loss of economic opportunities and positions and advancements in the future; loss of time and money trying to correct her background check report; the expenditure of labor and effort disputing and trying to correct the inaccurate reporting; damage to her reputation; loss of sleep;

lasting psychological damage; loss of capacity for enjoyment of life; and emotional distress, including mental anguish, anxiety, fear, frustration, humiliation, and embarrassment.

**CLAIMS FOR RELIEF**

**COUNT I**

**15 U.S.C. § 1681e(b)**

**Failure to Follow Reasonable Procedures to Assure Maximum Possible Accuracy**

84. Plaintiff re-alleges and incorporates by reference the allegations set forth in the preceding paragraphs as if fully stated herein.

85. Defendant is a “consumer reporting agency” as defined by 15 U.S.C. § 1681a(f).

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

87. At all times pertinent hereto, the above-mentioned consumer report was a “consumer report” as that term is defined by 15 U.S.C. § 1681a(d).

88. Defendant violated 15 U.S.C. § 1681e(b) by failing to establish or to “follow reasonable procedures to assure maximum possible accuracy” in the preparation of the consumer report it sold about Plaintiff as well as the information it published within the same.

89. As a result of Defendant’s violations of the FCRA, Plaintiff has suffered a range of actual damages including, without limitation, temporary loss of employment opportunities, wages, and benefits; loss of economic opportunities and positions and advancements in the future; loss of time and money trying to correct her background check report; the expenditure of labor and effort disputing and trying to correct the inaccurate reporting; damage to her reputation; loss of sleep; lasting psychological damage; loss of capacity for enjoyment of life; and emotional distress, including mental anguish, anxiety, fear, frustration, humiliation, and embarrassment.

90. Defendant willfully violated 15 U.S.C. § 1681e(b) in that its conduct, actions, and inactions were willful, rendering them liable for actual or statutory damages, and punitive damages in an amount to be determined by the Court pursuant to 15 U.S.C. § 1681n. Alternatively, they were negligent, entitling Plaintiff to recover under 15 U.S.C. § 1681o.

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

### **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff prays for the following relief:

- i. Determining that Defendant negligently and/or willfully violated the FCRA;
- ii. Awarding Plaintiff actual, statutory, and punitive damages as provided by the FCRA;
- iii. Awarding Plaintiff reasonable attorneys' fees and costs as provided by the FCRA; and,
- iv. Granting further relief, in law or equity, as this Court may deem appropriate and just.

### **DEMAND FOR JURY TRIAL**

Plaintiff is entitled to and hereby demands a trial by jury on all issues so triable.

Dated: November 26, 2024

*/s/ Aryeh E. Stein*  
Aryeh E. Stein, # 45895  
Meridian Law, LLC  
1212 Reisterstown Road  
Baltimore, MD 21208  
T: (443) 326-6011  
F: (410) 782-3199  
E:astein@meridianlawfirm.com

*Attorney for Plaintiff*  
*Shannon Marie Miller*



The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

SHANNON MARIE MILLER

(b) County of Residence of First Listed Plaintiff Cecil (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Aryeh E. Stein, Meridian Law, LLC, 1212 Reisterstown Road, Baltimore, MD 21208, T: (443) 326-6011

DEFENDANTS

STERLING INFOSYSTEMS, INC.

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF DEF, 1 1, 2 2, 3 3, 4 4, 5 5, 6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes codes like 110 Insurance, 310 Airplane, 365 Personal Injury, etc.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District (specify), 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 15 U.S.C. § 1681, et seq. Brief description of cause: Plaintiff alleges violations of the Fair Credit Reporting Act against Defendant

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE DOCKET NUMBER

DATE SIGNATURE OF ATTORNEY OF RECORD

Nov 25, 2024 /s/ Aryeh E. Stein

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

**Case 1:24-cv-03407 Document 1-1 Filed 11/26/24 Page 2 of 2**  
**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.  
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.  
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.  
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.  
 Original Proceedings. (1) Cases which originate in the United States district courts.  
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.  
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.  
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.  
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.  
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.  
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.  
**PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.  
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.  
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Maryland

SHANNON MARIE MILLER

Plaintiff(s)

v.

STERLING INFOSYSTEMS, INC.

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Sterling Infosystems, Inc.
c/o e Paracorp Incorporated
245 West Chase Street
Baltimore, MD 21201

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Aryeh E. Stein
Meridian Law, LLC
1212 Reisterstown Road
Baltimore, MD 21208

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_ , who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 \_\_\_\_\_ .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc: