

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BENJAMIN MCKEY, individually and as a  
representative of the Class,

Plaintiff,

v.

Case No. 2:22-cv-01908-GJP

TENANTREPORTS.COM, LLC

Defendant.

**DECLARATION OF RITESH PATEL  
IN CONNECTION WITH NOTICE DISSEMINATION**

Ritesh Patel, pursuant to 28 U. S. C. § 1746, hereby declares and states as follows:

1. I am member of Continental DataLogix LLC (“Continental”), which was appointed to aid in giving notice to potential Class Members and I was responsible for overseeing the dissemination of notices to members of the Class.

2. Pursuant to the Order Preliminarily Approving Settlement and Providing for Notice dated September 15, 2023, Continental was appointed as the Settlement Administrator in this case.

3. Continental was provided with a mailing list containing names, mailing addresses, and email addresses, if available, for 4,615 Class Members.

**Mailing of the Notice**

4. In preparation for the notice mailing, Continental processed the mailing addresses through the search firm LexisNexis to locate updated addresses. This process resulted in 3,797 updated addresses. In addition, the addresses were also run through the United States Postal Service’s (“USPS”) National Change of Address (“NCOA”) database. The NCOA process provided updated addresses for Class Members who have submitted a change of address with the USPS in the last 48 months, and the process also standardized the addresses for mailing. Continental then prepared a mail file of Class Members that were to receive the notices via First Class Mail.



**Notice Summary**

10. In summary, the total number of Class Members who are presumed to have successfully received Notice is as follows:

Total Original Mailing List:	4,615	
Total Number of Class Members who did not receive one of the following Notices:		
Initial Mailed Notice		
Initial Email Notice	<u>(434)</u>	
Total Number of Class Members who are presumed to have received some form of Notice		
	4,181	90.6%

**Website**

11. An informational website (<https://www.McKeySettlement.com>) was created and made available on October 1, 2023. The website provides Class Members with the ability to submit a claim online and send email inquiries, and contains the following:

- |  |  |
|--|--|
| • Class Action Complaint                   | • Long Form Notice                                     |
| • Settlement Agreement                     | • Claim Form   |
| • Motion for Preliminary Approval          | • Motion for Attorneys’ Fees, Costs and Service Award  |
| • Proposed Consent Injunctive Relief Order | • Contact Information for the Settlement Administrator |
| • Preliminary Approval Order               | • Important Dates                                      |

12. As of the close of business on December 7, 2023, Continental has responded to 18 email inquiries and 49 telephone inquiries.

**Exclusion Requests and Objections**

13. The postmark deadline for requesting exclusion from the Class is February 12, 2024.

14. As of the close of business on December 7, 2023, Continental has not received any exclusion requests.

15. The postmark deadline for filing a written notice of objection was December 5, 2023. As of the close of business on December 7, 2023, Continental has not received any objections to the Settlement

1 from a Class Member that appears on the Class List.

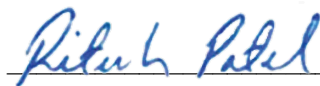
2 16. Top Class Actions, an internet provider of information about class action settlements,  
3 posted an article about this settlement on its website. Subsequent to this posting, Continental received one  
4 purported objection, which is attached as Exhibit C. The individual who submitted this purported objection  
5 does not appear on the Class List and is therefore not a class member. Therefore, this purported objection  
6 is not being considered valid.

7 **Claim Filing**

8 17. The postmark deadline for Class Members to file a Claim Form was December 5, 2023.  
9 As of December 7, 2023, Continental has received a total of 204 timely filed claim forms.

10 18. After this settlement was posted on Top Class Actions website, as discussed at Paragraph  
11 16 above, Continental received an influx of 164 claims by individuals whose names do not appear on the  
12 Class List. Continental will contact these claimants and provide them with 14 days to submit information  
13 that will allow the parties to make a determination as to their eligibility to participate in the settlement. At  
14 the present time, these claims have been preliminarily disallowed.  
15

16  
17 I declare under penalty of perjury that the foregoing is true and correct. Executed on this 8<sup>th</sup> day of  
18 December 2023.

19 

20 Ritesh Patel



# EXHIBIT A

McKey v. Tenantreports.com  
c/o Settlement Administrator  
P.O. Box 16  
West Point, PA 19486

PRESORTED  
FIRST-CLASS MAIL  
U.S. POSTAGE PAID  
MAG

# COURT AUTHORIZED NOTICE

*Benjamin McKey v.  
Tenantreports.com, LLC*

Claim Form Deadline is  
December 5, 2023



<<ID>>

Postal Service: Please do not mark barcode

Claim Number: <<ucode>>

<<FirstName>><<LastName>>  
<<Address1>>  
<<Address2>>  
<<City>>, <<State>> <<Zip>>  
<<Country Code>>

BLIND PERF DOES NOT PRINT

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF PENNSYLVANIA  
*McKey v. Tenantreports.com, LLC* – **OPTIONAL CLAIM FORM**

ID#<<ID>>

1. This form is **OPTIONAL**. You will receive a payment in this Settlement even if you do not complete this form. You should **ONLY** fill out this form if the "Statement for Additional Cash Payment" below is true.
2. The kind of "harm" that qualifies for an additional cash payment is any harm beyond the invasion of privacy you may have felt when outdated information is included on a report. Examples of harm that would qualify include, but are not limited to, being denied a rental, or having your rental application delayed as a result of the consumer report including outdated adverse non-conviction information.
3. If you are eligible for an additional cash payment, you must sign, print your name, and date the form below to receive the payment.
4. The deadline to submit a claim is December 5, 2023.
5. Your payment will be sent to the same address this postcard was mailed to unless you change the contact information below in Section I and Section II. If you provide updated contact information below, we will use that information in the event we need to contact you regarding the Settlement in the future.

Statement for Additional Cash Payment

I experienced harm as a result of Tenantreports.com issuing a consumer report that contained at least one adverse non-conviction record that predated the date the report was issued by seven years or more.

Signature	Printed Name	Date
-----------	--------------	------

**I: Provide Your Telephone and Email** -- Telephone: \_\_\_\_\_ Email: \_\_\_\_\_

**II: Update Your Mailing Information if Needed** -- Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

A Settlement has been reached in the class action lawsuit (the "Litigation") against Tenantreports.com, LLC for alleged violations of the Fair Credit Reporting Act ("FCRA"). As used in this Notice, "TRC" collectively refers to Xactus, LLC, in its capacity as successor in interest to certain assets of Tenantreports.com, LLC, and Tenantreports.com, LLC. Plaintiff claims that TRC violated the FCRA by providing background reports that included at least one record of a criminal non-conviction that predated the date the report was issued by seven years or more. TRC vigorously denies that it violated any law but has agreed to settle to avoid the uncertainties and expenses associated with continuing the Litigation. This Notice summarizes the proposed Settlement. The complete Settlement terms and conditions are available in the Settlement Agreement at [www.McKeySettlement.com](http://www.McKeySettlement.com).

**Am I a Class Member?** TRC's records indicate you are a Class Member. This means, between April 8, 2020 and April 9, 2023, TRC prepared a background report on you where the report contained at least one record of a criminal non-conviction that predated the issue date of the report by seven years or more.

**What Can I Get?** The Settlement establishes an \$877,800 Settlement Fund for payments to Class Members, after payment of attorneys' fees and the cost for settlement administration, and any approved service award. The parties estimate Class Members will each receive approximately \$75.

**What Are My Other Options?** (1) Do Nothing. If you do nothing in response to this Notice, you will receive a monetary recovery and will lose both your right to sue TRC over matters related to this suit and to object to the Settlement of this suit. (2) Make a Claim. If you believe you experienced additional harm from the inclusion of an outdated criminal non-conviction on a report, you may seek an additional amount from the Settlement Fund by submitting the attached Claim Form or filing a claim online. (3) Exclude Yourself. You may exclude yourself from the Class by mailing a written notice to the Settlement Administrator postmarked by February 12, 2024, that includes a signed and dated statement you want to be excluded from the Class in *McKey v. Tenantreports.com, LLC* and includes your name, address and telephone number. If you exclude yourself, you will not receive a settlement payment, but you retain any rights you may have to sue TRC over the legal issues in the Litigation. (4) Object. If you do not exclude yourself, you and/or your lawyer have the right to appear before the Court and object to the Settlement. Your written, signed objection must be mailed by first class mail to the Settlement Administrator, and postmarked no later than December 5, 2023. Specific instructions on how to object to or exclude yourself are available at [www.McKeySettlement.com](http://www.McKeySettlement.com).

**Who Represents Me?** The Court has appointed lawyers from Berger Montague PC to serve as Class Counsel. They will petition to be paid legal fees not to exceed \$292,600, out of pocket costs, a service award not to exceed \$7,500, and settlement administration expenses from the Settlement Fund.

**When Will the Court Consider the Settlement?** The Court will hold a Final Approval Hearing on February 27, 2024, at 10:00 a.m. At that hearing, the Court will hear any objections concerning the fairness of the Settlement, decide whether to approve the requested attorneys' fees and costs, service award, and determine whether the Settlement should be approved.

**How Do I Get More Information?** For more information, including the full Notice, and Settlement Agreement, go to [www.McKeySettlement.com](http://www.McKeySettlement.com), or contact the Settlement Administrator at (833) 215-9289.

BLIND PERF DOES NOT PRINT



Postage  
Required  
Post Office will  
not deliver  
without proper  
postage.

MCKEY v. TENANTREPORTS.COM  
C/O SETTLEMENT ADMINISTRATOR  
PO BOX 16  
WEST POINT PA 19486-0016



# EXHIBIT B

**Ritesh Patel**

---

**From:** McKey v.Tenantreports.com Settlement Administrator <questions@mkeysettlement.com>  
**Sent:** Friday, October 6, 2023 9:02 AM  
**To:** John Q. ClassMember  
**Subject:** Important notice of your rights in a class action settlement – McKey v.Tenantreports.com

**ID: #####**

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

A FEDERAL COURT AUTHORIZED THIS NOTICE

*This is not a solicitation from a lawyer. You are not being sued.*

**Your Claim Number:** **EQ-ABCD123**

**Your Contact Information:** **JOHN Q. CLASSMEMBER**

**100 PLEASANT HILL ST**

**ANYTOWN, PA 19000**

If the address listed above is incorrect, please update your address by replying to this email.

**Your rights and options – and the deadlines by which to exercise them – are explained in this Notice. Please read this Notice carefully in its entirety.**

- You are receiving this Notice because you have been identified as a class member in a class action lawsuit entitled *Benjamin McKey v. Tenantreports.com, LLC*, No. 2:22-cv-01908-GJP, which claims that Tenantreports.com, LLC violated the Fair Credit Reporting Act (“FCRA”). As used in this Notice, “TRC” collectively refers to Xactus, LLC, in its capacity as successor in interest to certain assets of Tenantreports.com, LLC, and Tenantreports.com, LLC.
- The lawsuit alleges that TRC violated the FCRA by reporting criminal non-conviction information in background reports where that information predated the date of the report by more than seven years. TRC denies Plaintiff’s allegations and denies that TRC is liable to Plaintiff or any of the putative Settlement Class Members.
- The parties have reached a proposed Settlement in the lawsuit. The Settlement has not been approved by the Court yet. This Notice explains your options.
- If you do nothing, you will receive a cash payment that is estimated to be at least \$75, although the amount will vary as explained herein.
- You have the right to submit a Claim Form for an additional payment if you experienced additional harm as a result of TRC issuing a background report that contained at least one adverse non-conviction record that predated the date the report was issued by seven years or more. Examples of qualifying harms include, but are not limited to, denial of a rental or delay in your application.

- You have the right to opt-out of the proposed Settlement or to object to it.
- Whether you act or not, your legal rights are affected by the proposed Settlement.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS PROPOSED SETTLEMENT</b>		
<b>Your Rights and Options</b>	<b>What to Do</b>	<b>Deadline to Do It</b>
<b>Do Nothing</b>	You are not required to take any action to receive the benefits of the proposed Settlement. If the proposed Settlement is finally approved and you do not opt-out, then you will receive an estimated payment of \$75, although the amount will vary as explained herein. You will be bound by the Court's final judgment and the release of claims in the Settlement Agreement.	None
<b>Submit a Claim Form</b>	Submit a form to the Settlement Administrator for an additional payment from the Settlement. For more information, please read Section 5 below.	Postmarked on or before December 5, 2023
<b>Opt-out of the Settlement</b>	Write to the Settlement Administrator stating that you do not wish to participate in the proposed Settlement. See Section 7 below. If you validly opt-out, you will not receive any monetary payments from the Settlement.	Postmarked on or before February 12, 2024
<b>Object to the Settlement</b>	Write to the Settlement Administrator about why you do not like the proposed Settlement. For more information regarding objecting, please read Section 10 below.	Postmarked on or before December 5, 2023

**1. Does this Notice apply to me?**

If, from April 8, 2020 to April 9, 2023, you were the subject of a background report prepared by the Tenantreports.com line of business that included at least one criminal non-conviction record, based on the Parties' review of TRC's records, that predated the date the report was issued by seven years or more, then you are included in this Settlement as a "Settlement Class Member."

This Notice informs you about the proposed Settlement and your rights. Before any final judgment is entered, the Court will have a hearing to decide whether to approve the proposed Settlement. The proposed Settlement

will be only finally approved after any objections or appeals are resolved. If the proposed Settlement is finally approved, then you will benefit from the relief provided by the proposed Settlement. Once the proposed Settlement is final, you will also be bound by the release and other provisions of the proposed Settlement.

This Notice is only a summary of the proposed Settlement. More details about the proposed Settlement, the date when appeals are no longer allowed and the Settlement is final, deadlines for certain actions, and your options are available in a longer document called the Settlement Agreement. You can get a copy of the Settlement Agreement by visiting [www.McKeySettlement.com](http://www.McKeySettlement.com).

The class action lawsuit is known as *Benjamin McKey v. Tenantreports.com, LLC*, No. 2:22-cv-01908-GJP, and is pending in the United States District Court for the Eastern District of Pennsylvania, with Judge Gerald J. Pappert presiding. The individual who sued is called the Plaintiff; the company that he sued is called the Defendant. The Plaintiff is Benjamin McKey. The Defendant is Tenantreports.com, LLC and Xactus, LLC, in its capacity as successor in interest to certain assets of Tenantreports.com, LLC.

## **2. What is this lawsuit about?**

The lawsuit alleges that TRC violated the FCRA by providing background reports that included at least one record of a criminal non-conviction that predated the date the report was issued by seven years or more. TRC denies Plaintiff's allegations and denies that TRC is liable to Plaintiff or any of the putative Settlement Class Members. TRC has asserted many defenses, including that certain reports may not qualify as consumer reports under the FCRA. The Court has not decided whether either side is right or wrong. Instead, both sides agreed to the Settlement to resolve the case and provide benefits to the class.

The Named Plaintiff here, Benjamin McKey, filed this case as a proposed class action. When the parties reached this proposed Settlement, the Court had not decided whether the case could be a class action. As part of the proposed Settlement, the Court certified a tentative class action for settlement purposes only, under Rule 23. If the proposed Settlement is not finally approved, then the Court may later determine if the case may proceed as a class action.

## **3. How do I know if I am part of the proposed Settlement?**

The Court has decided that everyone who fits the following description is a Settlement Class Member:

All persons residing in the United States of America (including its territories and Puerto Rico) who: (1) were the subject of a background report prepared by the TenantReports.com line of business between April 8, 2020 and April 9, 2023; (2) where the report contained at least one record of a criminal non-conviction, based on the Parties' review of Defendant's records, that predated the date the report was issued by seven years or more.

The individuals to whom this Notice was sent have been identified as Settlement Class Members based on the business records maintained by TRC and further manual review of additional information.

## **4. What benefits does the proposed Settlement provide?**

The proposed Settlement benefits include both monetary (money) and injunctive (practice changes) relief. An injunction occurs when a court orders a person to do or not to do something. In particular, the Settlement provides for the following benefits.

The Settlement establishes a Settlement Fund that contains \$877,800 for payments to Class Members. The Settlement Fund provides for payments to Settlement Class Members as follows:

All Settlement Class Members will receive a portion of the Settlement Fund divided equally between all Settlement Class Members. Class Counsel estimates that the amount of those payments would be approximately \$75. However, the final amount of the payment may be more or less. The final payment amount for this portion of the Settlement will be determined based on how many people submit Claims for an additional payment, as well as on the amount awarded by the Court for settlement administration costs, attorneys' fees and expenses, and a class representative service payment.

A Settlement Class Member can also receive an additional payment from the Settlement Fund by taking the following action:

Each Settlement Class Member who alleges he or she experienced harm as a result of TRC, during the class period, issuing a consumer report that contained at least one adverse non-conviction record that predated the date the report was issued by seven years or more, can submit a Claim Form for payment. The Claim Form requires a claimant to attest that he or she suffered harm as a result of the conduct referenced above. Individuals who submit a valid Claim Form will receive an additional payment.

The proposed Settlement also provides that TRC will agree to make changes to its practice, which are described in the Consent Injunctive Relief Order that is available on the Settlement website.

**No Class Members will have to pay or buy anything to benefit from the relief provided by the Settlement Agreement.**

#### **5. How do I submit a Claim Form to receive an additional payment from the Claims Fund?**

If you suffered additional harm due to TRC, during the class period, issuing a consumer report that contained at least one adverse non-conviction record that predated the date the report was issued by seven years or more, please complete the Claim Form and mail it to McKey v. Tenantreports.com, c/o Settlement Administrator, P.O. Box 16, West Point, PA 19486. Your Claim Form must be postmarked by December 5, 2023. You may also submit a Claim Form at the Settlement website, [www.McKeySettlement.com](http://www.McKeySettlement.com).

The kind of "harm" that qualifies for an additional cash payment is any harm beyond the invasion of privacy you may have felt when outdated information is included on a report. Examples of harm that would qualify include, but are not limited to, being denied a rental, or having your rental application delayed as a result of the consumer report including outdated adverse non-conviction information.

#### **6. How does the proposed Settlement affect my rights?**

In general terms, if the proposed Settlement is finally approved by the Court, then you will be giving up the right to file a lawsuit against TRC or related companies for certain claims regarding the inclusion of a record of a criminal non-conviction on a TRC background report where that record predated the date of the report by more than seven years. Specifically, you will be giving up the right to bring any claims resulting from, arising out of, or regarding the inclusion of a criminal non-conviction record that appeared on a TRC background report that predated the date of the report by more than seven years during the class period. You will be giving up all such claims whether or not you know about them.



**The precise terms of the dismissal and release are explained in the Settlement Agreement, which you can view on the Settlement website, [www.McKeySettlement.com](http://www.McKeySettlement.com).**

Unless you opt-out of the Settlement, the Court's order will apply to you even if you object to the Settlement or have any other claim, lawsuit, or proceeding pending against TRC. If you have any questions about the release, then you should visit [www.McKeySettlement.com](http://www.McKeySettlement.com) for more information or consult with a lawyer. See Section 8 below for more information regarding your options in seeking legal advice concerning the Settlement.

#### **7. Can I choose not to be in the proposed Settlement?**

Yes. You have the opportunity to opt-out of the Settlement by submitting a written Request for Exclusion to McKey v. Tenantreports.com, c/o Settlement Administrator, P.O. Box 16, West Point, PA 19486, postmarked by February 12, 2024. To be valid, a Request for Exclusion must be personally signed and must include: (i) your name, address and telephone number; (ii) and a statement substantially to the effect that: "I request to be excluded from the Settlement Class in *Benjamin McKey v. Tenantreports.com, LLC*." Notwithstanding the foregoing, no person within the Settlement Class may submit a Request for Exclusion for any other person in the Settlement Class. If a Settlement Class Member submits both a Request for Exclusion and a Claim Form, the Claim Form shall take precedence and the individual shall *not* be deemed to have validly excluded himself or herself from the Settlement.

If you timely submit a valid Request for Exclusion, you will exclude yourself from the Settlement Class. You will not receive the benefits of the Settlement and you will not be bound by further orders or judgments in the Litigation, subject to Court approval. You will preserve your ability to independently pursue, at your own expense, any individual claims that you claim to have against TRC. No person who has opted out of the Settlement may object to any part of the Settlement Agreement.

#### **8. Do I have a lawyer in this case?**

Yes. The Court approved the following individuals to represent you and other Class Members:

- E. Michelle Drake and Joe Hashmall of Berger Montague PC. You may contact Class Counsel at 1229 Tyler Street, Suite 205, Minneapolis, MN 55413. If you have questions about the Settlement or this Notice, you may also call (612) 594-5999 or email [TRCSettlementCounsel@bm.net](mailto:TRCSettlementCounsel@bm.net).

The Court has appointed these lawyers as Class Counsel. You will not be personally charged for these lawyers. You may hire your own attorney, if you so choose, but you will be personally responsible for your attorney's fees and expenses.

#### **9. How will the lawyers be paid? What will the Class Representative receive?**

The attorneys representing the class have handled this case on a contingency basis. To date, they have not been paid anything for their work. Class Counsel will request that the Court award attorneys' fees and expenses for the time and effort they have spent on this case. The amount that will be requested by Class Counsel as attorneys' fees will be no greater than \$292,600 plus reasonable out-of-pocket expenses and a Named Plaintiff service award for the Named Plaintiff of up to \$7,500. Class Counsel will file a motion for their attorneys' fees and expenses on or before November 20, 2023.

Any approved amount of attorneys' fees and expenses or Named Plaintiff service award will be paid from the Settlement Fund, and no Class Member will owe or pay anything directly for the attorneys' fees and expenses of Class Counsel.

**10. How do I tell the Court if I do not agree with the proposed Settlement?**

If you are a Settlement Class Member, then you can object to the proposed Settlement if you do not like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views.

To object to this Settlement Agreement, you must send your objection in writing to the Settlement Administrator by mailing it to McKey v. Tenantreports.com, c/o Settlement Administrator, P.O. Box 16, West Point, PA 19486, postmarked by December 5, 2023. The objection must include the following: (1) your full name, address and current telephone number; (2) the name and telephone number of your counsel, if you are represented by an attorney and if counsel intends to submit a request for fees, and all factual and legal support for that request; (3) all objections and the basis for any such objections stated with specificity, including a statement as to whether the objection applies only to the objector, to a specific subset of the class, or to the entire class; (4) the identity of any witnesses you may call to testify; (5) a listing of all exhibits you intend to introduce into evidence at the Final Approval Hearing, if any, as well as true and correct copies of all exhibits; and (6) a statement of whether you intend to appear at the Final Approval Hearing, either with or without counsel. If you fail to timely serve a written objection, you shall not be permitted to object to the approval of the Settlement or Settlement Agreement and shall be foreclosed from seeking any review of the Settlement or the terms of the Settlement Agreement by appeal or other means.

You will not be permitted to object to the Settlement or the Settlement Agreement if you decide to exclude yourself from the Settlement.

**11. When and where will the Court decide whether to finally approve the proposed Settlement?**

The Court will hold a Final Approval Hearing on February 27, 2024, at 10:00 a.m., before Judge Gerald J. Pappert, in Courtroom 11-A of the United States District Court for the Eastern District of Pennsylvania at 601 Market Street, Philadelphia, PA 19106.

At this hearing, the Court will consider whether the proposed Settlement is fair, reasonable, and adequate. The Court will consider all timely and proper objections. You do not have to attend the hearing.

The Court will also decide how much to award Class Counsel and the Named Plaintiff. After the hearing, the Court will decide whether to finally approve the proposed Settlement.

The Court may change the date of the Final Approval Hearing or elect to hold the hearing via videoconference or teleconference without further notice to the Class. You should check the website, [www.McKeySettlement.com](http://www.McKeySettlement.com), regularly to check on the hearing date, the court-approval process, and the Effective Date.

**12. How do I get more information?**

This Notice is only a summary of the proposed Settlement. More details about the proposed Settlement, the date when appeals are no longer allowed and the Settlement is final, deadlines for certain actions, and your options are available in a longer document called the Settlement Agreement. You can get a copy of the

Settlement Agreement by visiting [www.McKeySettlement.com](http://www.McKeySettlement.com). The website also contains answers to common questions about the proposed Settlement. In addition, some of the key documents in the case will be posted on the website. You can also write or call Class Counsel at the contact information listed above.

Please do not address questions about the Settlement or the litigation to the clerk of Court or to the Judge. They are not permitted to answer your questions.

Questions – call toll-free (833) 215-9289 or visit [www.McKeySettlement.com](http://www.McKeySettlement.com)

Click [here](#) to unsubscribe from future emails regarding McKey v. Tenantreports.com Settlement.

# EXHIBIT C



[REDACTED]  
Philadelphia, Pa. [REDACTED]

August 2, 2021

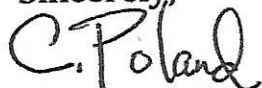
EXPERIAN  
701 Experian Parkway  
P.O. Box 2002  
Allen, Tx. 75013

Dear Gentleman,

There were several applications for the CHASE Freedom Unlimited Credit Cards and the Freedom Flex Credit Cards in the mail. I couldn't understand why there wasn't a DISCOVER IT Secured Credit Card application sent to me?

I currently oppose any forfeiture activity at the least. As a result of entering sweepstakes, contests, or deceptive telemarketing acts or practices *Rule 36 F.R.C.P., admission denied.* In accord with our Fair Credit Reporting Act, Consumer Fraud and Abuse Prevention and the Truth in Lending Act.

Sincerely,



Charles H. Poland Jr.

cp



[REDACTED]  
Philadelphia, Pa. [REDACTED]


August 2, 2021

TRANSUNION  
P.O. Box 2000  
Chester, Pa. 19016

Dear Gentleman,

There were several applications for the CHASE Freedom Unlimited Credit Cards and the Freedom Flex Credit Cards in the mail. I couldn't understand why there wasn't a DISCOVER IT Secured Credit Card application sent to me?

I currently oppose any forfeiture activity at the least. As a result of entering sweepstakes, contests, or deceptive telemarketing acts or practices *Rule 36 F.R.C.P., admission denied.* In accord with our Fair Credit Reporting Act, Consumer Fraud and Abuse Prevention and the Truth in Lending Act.

Sincerely,  


Charles H. Poland Jr.

cp

PO Box 9701  
Allen, TX 75013



0000789 01 MB 0.447 \*\*AUTO T3 0 7190 19144-353122 -C01-P00789-I  
CHARLES H POLAND Jr

PHILADELPHIA PA



# Your Dispute Results

Report # 2718-1107-89 for Aug 10, 2021



## Hi, Charles H. Welcome to your Dispute Results.

Our reinvestigation of the dispute(s) and/or other request(s) you recently submitted is now complete. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the requested status at the time of our reinvestigation.

This information is provided in response to your dispute(s) regarding inquiries shown on your personal credit report.

Experian is required by federal law to keep a record of all companies that have requested your credit information and to display the names of the requesting companies to you. Experian generates the information listed in the inquiry section from its own business records, which it has verified as accurate. The requesting companies do not place inquiries on consumers' credit reports. Some companies may be listed in the inquiry section under a parent, subsidiary, or other operating name that is different than the name you are familiar with.

Only companies who have certified to Experian that they have a permissible purpose under the Fair Credit Reporting Act may receive credit information about a consumer. Permissible purpose exists when you apply for credit, rental property, or utility service, or default on a loan causing it to be sent to a collection agency. Other examples of permissible purpose include your current creditors monitoring your accounts; other creditors wanting to offer you preapproved credit; an employer who wishes to extend an offer of employment; a potential investor assessing the risk of a current credit obligation; an end user completing your mortgage loan application; and insurance underwriting (auto or home). Your explicit permission is not always necessary for the company to have a permissible purpose.

Inquiries displayed to you under the heading "Credit Applications/Hard Inquiries" may affect your credit score. The inquiries displayed to you under the heading "Consumer Report Views/Soft Inquiries" do not affect your credit score. Inquiries may remain on your credit report for up to 25 months.

If you believe certain inquiries on your credit report were generated as a result of identity theft, please contact Experian by phone at 800 583 4080 or in writing at Experian, PO Box 9701, Allen, Texas, 75103, and provide specific information about the identity theft as it relates to the disputed inquiries.

In response to your recent request, we are sending you this credit report. Before contacting us, please review this report carefully. If you disagree with an item, you may dispute it. We will process disputes generally by sending your dispute to the furnisher of the information or to the vendor who collected the information from a public record. If we were able to make changes to your credit report based on information you provided, or if you requested the addition of a statement, we have done so. Otherwise, we have contacted the company reporting the information you disputed, supplied them all relevant information and any documents you gave us with your dispute, and instructed them to: review all information we provide them about your dispute; verify the accuracy of the information; provide us a response to your dispute; and update their records and systems as necessary.

## How to Read Your Results

**Deleted** - This item was removed from your credit report. **Remains** - The company that reported the information has certified to Experian that the information is accurate. This item was not changed as a result of our processing of your dispute. **Updated** (Your results will indicate which one of the following applies.) – a) The information you disputed has been updated. Please review your report for the details. b) The item you disputed has been updated, which may include an update to the disputed information. Please review your report for the details. c) The information you disputed has been verified as accurate, however, information unrelated to your dispute has been updated. Please review your report for the details. d) Information on this item has been updated. Please review your report for the details. **Processed** - This item was either updated or deleted; Please review your report for the details.

If our reinvestigation has not resolved your dispute, you have several options:

You may add a statement of up to 100 words to your report. If you provide a consumer statement that contains medical information related to service providers or medical procedures, then you expressly consent to Experian including this information in every credit report we issue about you. You may contact the company that reports the information to us and dispute it directly with them. If you wish to obtain documentation or written verification concerning your accounts, please contact your creditors directly. You may provide us additional information or documents about your dispute to help us resolve it by visiting [www.experian.com/upload](http://www.experian.com/upload). You may also mail your information to Experian, P.O. Box 9701, Allen, Texas 75013.



107627

CF-989

**PINK ENTRY CLAIM FORM**

# Notice Of Intent For CHARLES POLAND

PHILADELPHIA, PA

**YES, enter me in the 2021 ALL CASH Sweepstakes for a chance to win the \$25,000.00 LUMP SUM CASH** or any of the other cash prizes you're giving away.

I am enclosing \$ \_\_\_\_\_ to help provide care for homeless pets.

- \$2.50
- \$5
- \$10
- \$15
- \$25
- Other \$ \_\_\_\_\_

*This amount will really help!*

Make check payable to: **North Shore Animal League America.**

Just enter me in the sweepstakes.

**\$25,000.00**  
GRAND PRIZE  
**REMAINS UNAWARDED**

P216SFENP100-221



**\$ 25,000.00 CASH AWARD**

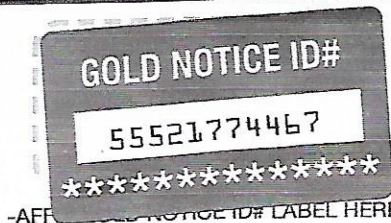
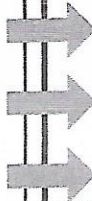
55521774467

TO INSERT IN OFFICIAL ENVELOPE FOLD IN HALF AND THEN IN HALF AGAIN

**NON-TRANSFERABLE FOR:**

**CHARLES POLAND**

**PHILADELPHIA, PA**



-AFF [unclear] NOTICE ID# LABEL HERE

**TO MAXIMIZE YOUR PRIZE ELIGIBILITY, REPLY BY FAST 50 EARLY DATE OF:**



**JULY 30, 2021**

**C POLAND: PRIZE PAYMENTS ARE READY FOR RELEASE!**



**PUBLISHERS CLEARING HOUSE**

15706c  
22-065

**\$5 THOUSAND**  
GUARANTEED PRIZE  
A WEEK "FOREVER!"

**\*\$5,000.00 A WEEK "FOREVER"\***

**CONTROLLER'S STATEMENT:**

Publishers Clearing House is fully prepared to release payments of \$5,000.00 A Week "Forever" to the Winner! Response by the deadline is critical for eligibility to Win from this Notice.

**READY FOR RELEASE**  
PENDING TIMELY RETURN OF A  
WINNING NUMBER

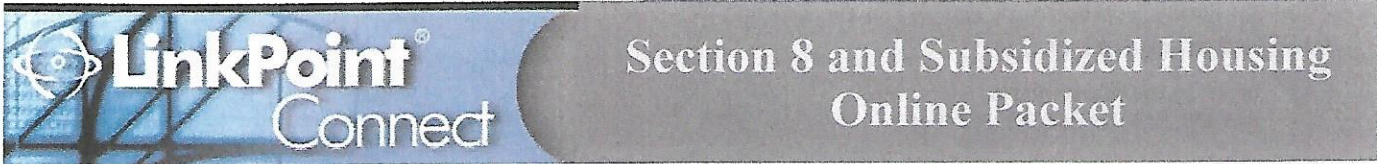
FAILURE TO RESPOND BY ENTRY DEADLINE WILL VOID ANY PRIZE PAYMENTS THAT COULD HAVE BEEN WON

*Michael Collins*  
PCH CONTROLLER

065 5706 101

THE FACE OF THIS DOCUMENT HAS TIME SENSITIVE INFORMATION





### Billing Information

Please fill in the required information

<b>Company</b>	
★ Name	to- Ms. Jeneen Allen/c.o. Mr. Charles Poland
★ Street address	[REDACTED]
★ City	Philadelphia
★ State (US residents only)	Pennsylvania
★ State/Province (Non-US residents only)	[REDACTED]
★ Zip/Postal code	[REDACTED]
★ Country	United States
Phone number	[REDACTED]
Fax number	n/a
Email address	n/a

Your order amount is: \$ 10.00

★ indicates a required field

©2005, LinkPoint International. All rights reserved.  
 Payments processed by LinkPoint International®  
[View LinkPoint privacy policy](#)

section8programs.com®

providing low income grants  
and affordable housing opportunities

---

### Pre - Order Form

Upon submission of your billing information, you will be directed immediately to the **Section 8 and Subsidized Housing Online Packet**.

Your Online Packet will consist of the following:

**Applications**

Apply for the Section 8 Consolidation Program Grant Program online. **This program is not affiliated with HUD and awards grants, not housing vouchers. No waiting list. Applications accepted online until October 5, 2008.**

**Housing Authorities**

Find housing authorities that are accepting **Section 8 and Public Housing** applications online.

**Become a Section 8 landlord**

Have access to all of the information necessary to accept the Section 8 Housing Choice Voucher and learn about other government subsidized programs and how to be apart of them.

**Section 8 Homeownership Program**

Learn how to use your Section 8 voucher to buy a house and make mortgage payments in your city and state.

**Affordable daycare**

Find the best rates at local daycare centers.

**HUD Homes**

Locate available HUD Homes in your city and state.

We now accept check or debit cards with these logos



You will receive instant and unlimited online access to all of the fore-mentioned information and services after submitting the order form. There will be a one time registration fee of **\$10.00**.

Continuing to the order form means that you have read and agreed to our [Terms of Service Agreement](#).

[Continue to Secure Order Form](#)

[Click here for money order payments](#)

[Main](#) | [Legal](#)

## **ID Theft : Steps for Victims to take to Protect their Identity**

**FILE A POLICE REPORT** - This step triggers helpful federal and state protections. A police report is helpful when contacting creditors also, about the ID theft.

**CLOSE AFFECTED ACCOUNTS** - Bank & credit accounts that may be affected by identity theft. If drafting payments from these accounts. Be sure to update the information with those businesses.

**NOTIFY THE CREDIT BUREAU** - For either a fraud alert or security freeze from the credit bureau. By phone or mail or on their website:  
EQUIFAX .com  
EXPERIAN .com  
TRANSUNION .com

**NOTIFY THE FEDERAL TRADE COMMISSION** - File a report with Federal Trade Commission by calling 1877-438-4338 or use the FTC's online complaint form.

Also other tips that includes;

- Notifying the post office of fraud, etc.
- Seeking psychological counseling for emotional stress
- Avoiding pre-approved credit offers in the mail
- Keeping record of your dealing with the police or creditors
- Getting legal help, when needed
- Watch your credit report for additional cases of fraud

Legal Support Services;

- Legal Aid of Southeastern Pennsylvania
- Community Impact Legal Services
- Community Legal Services, Inc.
- Philadelphia Legal Assistance Center



HAP Legal Clinic 09/06/2023

Charles Poland Jr [REDACTED]

Wed 9/6/2023 12:00 PM

To:info@haplegal.org <info@haplegal.org>

Cc:jeneenallen17 [REDACTED]

Sept. 6, 2023

Homeless Advocacy Project (H.A.P.)  
PHMC Care / Legal Clinic  
Philadelphia, Pa. 19123

Dear H.A.P. Legal Clinic,

On Wednesday, August 30, 2023 a friend of mine Jeneen stop by and mentioned. That she was offered a nice room for rent. While preparing to go to work either today or tomorrow she responded.

Earlier that month I needed to email the office of Rep. Stephen Kinsey. In avoidance of unwanted activity at the moment. I explained that Jeneen Allen was working and helping out with local Election Campaign activities. Contesting that City Services (Election Campaigns) adversed on her prior to a PHA. housing application that was submitted to resolve this matter last year. I couldn't help but to think who were the people that recommended she work there? My friend Jeneen has been moving back and forth, in and out, for so long she's exhausted shelter services already.

Nevertheless, this shouldn't effect further EDUCATION & JOB TRAINING PROGRAMS for her. If it's granted properly with respect to NONDISCRIMINATION PROVISIONS, VOLUNTEER SERVICES, and the FAIR LABOR STANDARDS ACT.

These are some of the issues we are concerned about with Jeneen currently.

Sincerely,  
Charles Poland