

**THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

1. BRUCE D. WHITE, on behalf of himself
and all others similarly situated,

Plaintiff,

vs.

**1. TULSA’S GREEN COUNTRY
STAFFING L.L.C.**
c/o statutory agent
5841 South Garnett Road
Tulsa, Oklahoma 74146

AND

2. SHIELD SCREEN, L.L.C.
d.b.a. **SHIELD SCREENING**
c/o statutory agent
11719 South Memorial
Bixby, Oklahoma 74008

Defendants.

CASE NO. 16-cv-00658-JED-FHM

UNITED STATES DISTRICT JUDGE

CLASS ACTION COMPLAINT

(Jury Demand Endorsed Hereon)

COMES NOW Plaintiff Bruce D. White, on behalf of himself and all others similarly situated, and files his Class Action Complaint against Tulsa’s Green Country Staffing, LLC (“Green Country”) and Shield Screen, LLC (“Shield Screening”) (collectively, “Defendants”). To Plaintiff’s knowledge, this matter is not related to any previously filed case in this Court. Plaintiff alleges, based on personal knowledge as to Defendants’ actions and upon information and belief as to all other matters, as follows:

NATURE OF THE CASE

1. Plaintiff brings this action against Defendants for violations of the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. §§ 1681a-1681x.

2. Green Country operates a temporary staffing agency, which it staffs with consumers like Plaintiff. As part of its hiring process, Green Country uses criminal background reports generated by Shield Screening to make employment decisions. Because such employment decisions are based in whole or in part on the contents of the criminal background reports, Green Country is obligated to adhere to certain strictures of the FCRA.

3. Shield Screening operates a national database of public records and related employment histories as a nationwide consumer reporting agency (“CRA”). It maintains an FCRA database to prepare and furnish consumer reports for employment and other purposes. Shield Screening provides these consumer reports to prospective and existing employers of Plaintiff and members of the putative classes. Many of these employers, like Green Country, refused to hire or discharged Plaintiff and other individuals based in whole or in part on the contents of the consumer reports.

4. When using criminal background reports for employment purposes, Green Country must, before taking an adverse employment action based in whole or in part on the contents of the report, provide job applicants like Plaintiff with a copy of his respective report as well as a written summary of their rights under the FCRA.

5. Providing a copy of the criminal background report as well as a statement of consumer rights before making an adverse employment decision arms the nation’s millions of job applicants with the knowledge needed to challenge inaccurate, incomplete, and misleading public-records-based reports. The FCRA is designed to permit individuals whose reports are

inaccurate with ample time to identify the inaccuracies and correct them before the employer takes an adverse employment action.

6. Plaintiff brings class claims against Green Country under 15 U.S.C. § 1681b, because it failed to provide Plaintiff with a copy of the criminal background report or summary of his FCRA rights before taking an adverse action against him.

7. Plaintiff brings class claims under 15 U.S.C. § 1681k against Shield Screening because it did not provide Plaintiff and other similarly situated consumers notice that it was furnishing a potentially adverse employment-purposed consumer report at the time it did so. This important requirement is intended to provide consumers immediate notice of the furnishing of an employment report and details necessary to preemptively correct inaccuracies in the furnished report with both the CRA and the potential employer. Shield Screening further violates 15 U.S.C. § 1681k by failing to maintain strict procedures to insure that the adverse public record information reported in its consumer reports is complete and up to date. Shield Screening's failure to comply with the longstanding requirements of Section 1681k denied the Plaintiff and each putative class member these important rights.

8. Plaintiff brings an individual claim under 15 U.S.C. § 1681e(b) against Shield Screening because of inaccuracies contained in his consumer report. Shield Screening sold to Green Country a report on Plaintiff that indicated a felony conviction but did not also report that the conviction had been reduced to a misdemeanor.

9. The FCRA imposes upon Shield Screening the obligation to maintain systems to ensure the maximum possible accuracy of the information that it puts into consumer reports. Since Shield Screening failed to include the entire history of Plaintiff's felony charge, its system

falls short of this requirement. Shield Screening’s misreporting of this information denied Plaintiffs the benefit of this valuable right.

PARTIES

10. Plaintiff Bruce D. White is a “consumer” a citizen of the state of Oklahoma and a “consumer” within the meaning of 15 U.S.C. § 1681a.

11. Defendant Green Country is an Oklahoma limited liability company with a principal place of business in Tulsa, Oklahoma.

12. Further, Green Country is a “person” using “consumer reports” to make “employment decisions” and take “adverse action” against “consumers”, as those terms are defined by 15 U.S.C. § 1681a.

13. Defendant Shield Screening is an Oklahoma limited liability company with a principal place of business in Bixby, Oklahoma.

14. Further, Shield Screening is a “consumer reporting agency” furnishing “consumer reports” for “employment purposes” within the meaning of 15 U.S.C. § 1681a.

JURISDICTION AND VENUE

15. The Court has federal question jurisdiction under the FCRA, 15 U.S.C. § 1681p, and 28 U.S.C. § 1331.

16. Venue is proper in this Court because Green Country and Shield Screening both maintain principal places of business in this District and otherwise resides in this District. 28 U.S.C. § 1391(b)(1).

17. Venue is also proper in this Court because a substantial part of the events giving rise to Plaintiff’s claims occurred in this District. 28 U.S.C. § 1391(b)(2).

ARTICLE III STANDING

18. Article III standing has three elements, as reiterated in *Spokeo v. Robins*, 136 S. Ct. 1540, 194 L. Ed. 2d. 635 (2016): “The plaintiff must have (1) suffered an injury in fact, (2) that is fairly traceable to the challenged conduct of the defendant, and (3) that is likely to be redressed by a favorable judicial decision.

19. The point of contention in *Spokeo* was the first of these three elements—injury in fact. The Court stated that “to establish injury in fact, a plaintiff must show that he or she suffered ‘an invasion of a legally protected interest’ that is ‘concrete and particularized’ and ‘actual or imminent, not conjectural or hypothetical.’” *Id.*

20. The Court did not reverse the holding of the Ninth Circuit that plaintiff Robins had adequately alleged standing.

21. The Court held that, for standing purposes, concrete injuries include intangible harms. Concrete means “real,” not “abstract,” but “it is not necessarily synonymous with ‘tangible.’ ... Although tangible injuries are perhaps easier to recognize, we have confirmed in many of our previous cases that intangible injuries can nevertheless be concrete.” The Court also held that harm need not have already manifested itself in order to count as concrete. Rather, a “risk of real harm” can satisfy the requirement for concreteness for purposes of Article III.

22. The Court noted: “Because the doctrine of standing derives from the case-or-controversy requirement, and because that requirement in turn is grounded in historical practice, it is instructive to consider whether an alleged intangible harm has a close relationship to a harm that has traditionally been regarded as providing a basis for a lawsuit in English or American courts.” An example mentioned by the Court is slander, which is actionable because it is inherently damaging without showing actual damage to reputation, an intangible interest.

Similarly, the Court observed that “Many traditional remedies for private-rights causes of action—such as for trespass, infringement of intellectual property, and unjust enrichment—are not contingent on a plaintiff’s allegation of damages beyond the violation of his private legal right.” The harm can be actionable even if it is “difficult to prove or measure.”

23. Apart from intangible harms that have “a close relationship to a harm that has traditionally been regarded as providing a basis for a lawsuit in English or American courts,” Spokeo also recognized that Congress “may ‘elevat[e] to the status of legally cognizable injuries concrete, de facto injuries that were previously inadequate in law.’” “The Court stated: “Congress is well positioned to identify intangible harms that meet minimum Article III requirements, [and] its judgment is also instructive and important.” The Court observed that Congress identified such intangible harms in enacting the FCRA: “Congress plainly sought to curb the dissemination of false information by adopting procedures designed to decrease that risk.” Although “Article III standing requires a concrete injury even in the context of a statutory violation,” “the violation of a procedural right granted by statute can be sufficient in some circumstances to constitute injury in fact. In other words, a plaintiff in such a case need not allege any additional harm beyond the one Congress has identified.” The Court gave as examples of circumstances in which a plaintiff need not allege anything beyond a statutory violation the right to information that Congress had decided should be made public.

The FCRA contains a number of requirements for CRAs, furnishers, and users to provide notices to consumers. Of those FCRA notices that are privately enforceable, some notices must contain information that is specific to the consumer, such as the 1681k(a)(1) adverse public record information notices and the 1681b(b)(3) “pre-adverse action” employment notices. These

notices are “particularized” in that consumers only have the right to receive them when their own personal situation warrants it.

24. Such “notice” or disclosure violations present concrete harm in the form of “informational injury.” Failure to provide a notice required by the FCRA results in concrete injury in the form of the failure to receive information that Congress thought the consumer should receive. In *Spokeo*, the Court specifically noted that information injuries can present concrete harm, citing *Public Citizen v. U.S. Department of Justice*, which held that the plaintiff had standing to challenge the Justice Department’s failure to provide access to information, the disclosure of which was required by the Federal Advisory Committee Act, because the inability to obtain such information “constitutes a sufficiently distinct injury to provide standing to sue.” It also cited *Federal Election Commission v. Akins* for a similar point, “confirming that a group of voters’ ‘inability to obtain information’ that Congress had decided to make public is a sufficient injury in fact to satisfy Article III.”

25. These cases illustrate that an informational injury (i.e., being denied access to information to which an individual is entitled by statute) is a concrete injury under Article III. The right to such information in the form and manner Congress required creates a right akin to a property interest in the information mandated. Furthermore, in *Spokeo*, the Court cited the *Public Citizen v. U.S. Department of Justice* and *Federal Election Commission v. Akins* cases to illustrate instances in which “the violation of a procedural right granted by statute can be sufficient in some circumstances to constitute injury,” when “[i]n other words, a plaintiff in such a case need not allege any additional harm beyond the one Congress has identified.” In a number of FCRA cases, courts have found substantive “informational injury” beyond simply a violation of a procedural right, and these cases remain good law after *Spokeo*.

26. In addition to the informational injury, the failure to give any required disclosure creates the risk of real harm because the absence of the necessary information deprives the consumer of the ability to take actions based on that information.

27. In this case, as more fully described below, Shield Screening created a consumer report that falsely branded Mr. White a felon. Shield Screening then furnished that consumer reports to Green Country Staffing. At no point in time prior to the furnishing of those consumer reports did Shield Screening provide Mr. White with the information and notices required by Congress under the FCRA. Further, Green Country Staffing did not provide Mr. White with a copy of his background report, a written summary of consumer rights or a meaningful opportunity to dispute his Shield Screening report before it denied his employment opportunity.

28. Mr. White has suffered an injury in fact that is ‘concrete and particularized’ and ‘actual or imminent, not conjectural or hypothetical. Shield Screening, denied Mr. White access to information to which he was entitled by statute, which precluded Mr. White from taking the necessary steps to have the consumer reports that were furnished to Green Country Staffing corrected before any adverse action was taken against him. Mr. White further suffered an actual or imminent concrete and particularized injury in that Green Country Staffing failed to provide him with his background report or a meaningful opportunity to dispute the report before it denied him employment based on the report’s contents.

29. The challenged conduct, the failure to provide Mr. White access to information in which he was entitled to by statute, is fairly traceable to Shield Screening and Green Country Staffing. The challenged conduct is likely to be redressed by a favorable judicial decision.

30. Mr. White has standing to bring this lawsuit as all three elements of Article III standing are present against both defendants.

FACTUAL ALLEGATIONS

31. In late 2014, White was employed by Green Country for a short term staffing assignment. After his assignment ended in December 2014, White sought additional employment with Green Country.

32. On or about December 17, 2014, as part of White's application process for additional employment, Green Country engaged Shield Screening to provide a consumer report, which included public record information purportedly regarding White.

33. That same day, Shield Screening provided Green Country with an inaccurate consumer report that falsely indicated that White had been convicted of a felony. *See* Exhibit A attached. White has never been convicted of a felony.

34. Shield Screening did not provide White with notice of the derogatory consumer report at the time Shield Screening furnished the inaccurate report to Green Country.

35. Upon information and belief, Shield Screening utilizes a standard practice whereby it does not provide consumers with contemporaneous notice of derogatory consumer reports at the time such adverse public records information is furnished to potential employers in violation of 15 U.S.C. § 1681k(a)(1).

36. The erroneous felony conviction reported by Shield Screening is in reference to a 13-year old charge that was reduced to a misdemeanor on November 24, 1992. Importantly, White's Shield Screening Report varies from the clearly reported public record information on the Oklahoma State Courts Network, which reports the conviction as a misdemeanor. *See* Exhibit B attached. Thus, the consumer report furnished to Green Country was neither complete nor up-to-date.

37. By failing to keep its database complete and up-to-date, Shield Screening does not attempt to and did not comply with the “strict procedures” required by 15 U.S.C. § 1681k(a)(2).

38. Indeed, by ignoring the plain public records information contained within the Oklahoma State Court Network, Shield Screening does not follow reasonable procedures to assure maximum possible accuracy of the information contained in its consumer reports in violation of 15 U.S.C. § 1681e(b).

39. Shield Screening and other consumer reporting agencies traffic in the reputations of job applicants by purchasing public records data from various sources and compiling the information into a separate database used to generate consumer reports for a fee upon request.

40. Worse, consumer reporting agencies make this information available to employers instantly online, and rarely provide contemporaneous notice to job applicants that adverse public record information has been shared with a prospective employer.

41. After receiving White’s inaccurate consumer report, Green Country informed White that he was ineligible for employment based on the felony conviction contained in his consumer report.

42. Green Country did not provide White a copy of his consumer report or a summary of FCRA rights before taking adverse action against White by denying him employment. In fact, Green Country has never provided White with a copy of his consumer report or a summary of his rights under the FCRA.

43. Upon information and belief, Green Country utilizes a standard practice whereby it does not provide a copy of the consumer report and a summary of FCRA rights prior to taking adverse employment action against applicants based in whole or in part on information contained in consumer reports in violation of 15 U.S.C. § 1681b(b)(3).

44. Both Defendants' violations of the FCRA have been willful, wonton and reckless in that each Defendant knew or recklessly disregarded its failure to comply with the requirements of the FCRA. 15 U.S.C. § 1681n.

45. The specific requirements of 15 U.S.C. §§ 1681b(b)(3), 1681k, and 1681e(b) have been the subject of numerous federal district court, circuit court and Supreme Court decisions. Moreover, these requirements have been the subject of numerous Federal Trade Commission staff opinions authored over the last 15 years.

46. Such FTC staff opinions originated in 1997, and were publicly available to Green Country and Shield Screening.

47. Moreover, upon information and belief, these statutory requirements are also contained in contracts between Green Country and Shield Screening.

48. Upon information and belief, these contracts contain express language detailing the requirements of the FCRA, including 15 U.S.C. § 1681b(b)(3) such that Green Country had actual knowledge that adverse employment decisions based in whole or in part on a consumer report could not be made until the applicant had received a copy of the report and summary of rights.

49. In addition to explaining these FCRA requirements in its contracts with customers like Green Country, Shield Screening also makes available various training materials that provide additional compliance advice regarding the use of consumer reports for employment purposes.

50. Indeed, Shield Screening actively touts its expertise on its website with an entire page dedicated to the FCRA. *See* <http://www.shieldscreening.com/consumers/consumers.html>. (last visited August 17, 2016).

51. Despite its knowledge of these legal obligations, Defendants consciously disregarded its FCRA duties constituting willful violations of the FCRA. As a result, Defendants are liable to Plaintiff and the putative class members for statutory damages from \$100-\$1,000 for each violation, plus punitive damages and attorneys' fees and costs pursuant to 15 U.S.C. §§ 1681n and 1681o.

CLASS ACTION ALLEGATIONS

A. Plaintiff's Proposed Green Country Class – The Pre-Adverse Action Class

52. Pursuant to Federal Rule of Civil Procedure and 15 U.S.C. § 1681b(b)(3)(A), Plaintiff brings this action for himself and on behalf of a class ("The Pre-Adverse Action Class"), defined as:

All natural persons residing in the United States (including all territories and other political subdivisions of the United States) (a) who submitted an employment application or other request for placement to Green Country, (b) who were the subject of a consumer report which was used by Green Country or its agent to make an employment decision regarding such person during the FCRA statute of limitations period, 15 U.S.C. § 1681p, (c) for whom that decision was either a rejection, delay or other adverse employment action, and (d) who were not provided a copy of that consumer report and/or the mandatory disclosures required in 15 U.S.C. § 1681b(b)(3) before that adverse employment decision.

53. Specifically excluded from this Class are: (a) all federal court judges who preside over this case and their spouses; (b) all persons who elect to exclude themselves from the Class; (c) all persons who previously executed and delivered to Green Country releases of all their individual or class claims; and (d) Defendant's employees, officers, directors, agents, and representatives and their family members.

B. Plaintiff's Proposed Shield Screening Class – The Notice Class

54. Pursuant to Federal Rule of Civil Procedure 23 and 15 U.S.C. § 1681k(a), Plaintiff brings this action for himself and on behalf of a class ("The Notice Class"), defined as:

All natural persons residing in the United States (including all territories and other political subdivisions of the United States) (a) who were the subject of a Shield Screening consumer report issued after June 1, 2009 and furnished to a third party, (b) that was furnished for an employment purpose, (c) that contained at least one adverse record of a criminal conviction or arrest, civil lien, bankruptcy or civil judgment, and (d) to whom Shield Screening did not provide notice, on the day it furnished the report, that it was furnishing the subject report along with the name and address of the person receiving the report.

55. Specifically excluded from this Class are: (a) all federal court judges who preside over this case and their spouses; (b) all persons who elect to exclude themselves from the Class; (c) all persons who have previously executed and delivered to Shield Screening releases of all their individual or class claims; and (d) Defendants' employees, officers, directors, agents, and representatives and their family members.

C. Rule 23(a) Prerequisites

56. **Numerosity.** The Classes are so numerous that joinder of all members is impracticable. Information concerning the exact size of the classes is within the exclusive possession of Defendants. Upon information and belief, the Classes are comprised of at least 1,000 members and dispersed throughout the country. The names and addresses of the Class members are identifiable through documents maintained by the Defendants, and the Class members may be notified of the pendency of this action by published and/or mailed notice.

57. **Commonality.** Common questions of law and fact exist as to all members of each Class. Without limitation, the focus of this litigation will be on Defendants' uniform conduct and procedures, whether Green Country provided the required pre-adverse action notices, when it did so, and whether Green Country acted willfully in its failure to design and implement procedures to assure compliant delivery and/or timing of these notices. Similarly, the litigation will target whether Shield Screening provided the required Section 1681k notices, when it did so, whether Shield Screening maintains strict procedures to insure public record

information is complete and up-to-date, and whether Shield Screening acted willfully in its failure to design and implement procedures to assure compliance with this FCRA section.

58. **Typicality.** Plaintiff's claims are typical of the other Class Members' claims. As described above, Defendants use common practices and procedures in committing the conduct that Plaintiff alleges violated the FCRA and caused damage to himself and the Classes. Plaintiff seeks only statutory and punitive damages for his classwide claims, and, in addition, Plaintiff is entitled to relief under the same causes of action as the other members of the Classes. Defendant uniformly breached the FCRA by engaging in the violative conduct described above, and these violations had the same effect on each member of the Classes. Plaintiff is not susceptible to unique claims or defenses. Simply put, as Plaintiff's claims go, so go the claims of the Classes.

59. **Adequacy.** Plaintiff is a member of both Classes and will fairly and adequately protect the interests of the Classes. Plaintiff's interests coincide with, and are not antagonistic to, other Class Members' interests. Additionally, Plaintiff has retained counsel experienced and competent in complex consumer class-action litigation. Plaintiff's Counsel have prosecuted complex FCRA class actions across the country.

D. Rule 23(b) Prerequisites

60. Questions of law and fact common to the Classes predominate over questions affecting only individual Class Members, and a class action is superior to other available methods for the fair and efficient adjudication of the controversy. The statutory and punitive damages sought by each class member are such that individual prosecution would prove burdensome and expensive given the complex and extensive litigation necessitated by Defendants' conduct. It would be virtually impossible for the members of the Classes to, individually, effectively redress the classwide wrongs done to them, particularly in light of the

fact that the claims are part based on the failure of the Defendants to give Class Members proper noticed. Even if the members of the Classes themselves could afford such individual litigation, it would be unnecessarily burdensome on the courts.

61. Furthermore, individualized litigation presents a potential for inconsistent or contradictory judgments and increases the delay and expense to all parties and to the court system presented by the complex legal and factual issues raised by Defendants' conduct. By contrast, the class action device will result in substantial benefits to the litigants and the Court by allowing the Court to resolve numerous individual claims based upon a single set of proof in just one case.

CAUSES OF ACTION

Count I: (CLASS CLAIM) Green Country's Violations of 15 U.S.C. § 1681b(b)(3)(A)

62. Plaintiff incorporates by reference those paragraphs set out above as though fully set forth herein.

63. Green Country's failure to provide members of the Pre-Adverse Action Class with a copy of the consumer report upon which it based its decision to take adverse action prior to taking such action violated 15 U.S.C. § 1681b(b)(3)(A)(i).

64. Likewise, Green Country's failure to provide members of the Pre-Adverse Action Class with the mandated FTC Summary of FCRA Rights prior to taking such adverse action violated 15 U.S.C. § 1681b(b)(3)(A)(ii).

65. The conduct, action, and inaction of Green Country was willful, rendering it liable for statutory and punitive damages in an amount to be determined by the Court pursuant to 15 U.S.C. § 1681n.

66. Plaintiff and other members of the Pre-Adverse Action Class are entitled to

recover costs and attorneys' fees as well as appropriate equitable relief from Green Country in an amount to be determined by the Court pursuant to 15 U.S.C. § 1681n.

Count II: (CLASS CLAIM) Shield Screening's Violation of 15 U.S.C. § 1681k(a)

67. Plaintiff incorporates by reference those paragraphs set out above as though fully set forth herein.

68. The consumer reports of Plaintiff and the members of the 1681k Notice Class were furnished for employment purposes and contained one or more adverse public record information of the type that may affect an employer's hiring decision.

69. Shield Screening failed to timely provide the required FCRA notices to the Plaintiff and other members of the putative class in violation of 15 U.S.C. § 1681k(a)(1).

70. Further, Shield Screening uniformly fails to comply with the "strict procedures" required by Section 1681k(a)(2) and routinely fails to provide complete and up-to-date public record information in its furnished consumer reports.

71. The conduct, action, and inaction of Shield Screening was willful, rendering it liable for statutory and punitive damages in an amount to be determined by the Court pursuant to 15 U.S.C. § 1681n.

72. Plaintiff and other members of the putative Class are entitled to recover costs and attorneys' fees as well as appropriate equitable relief from Shield Screening in an amount to be determined by the Court pursuant to 15 U.S.C. § 1681n.

Count III: (INDIVIDUAL CLAIM) Shield Screening's Violation of 15 U.S.C. § 1681e(b)

73. Plaintiff incorporates by reference those paragraphs set out above as though fully set forth herein.

74. Plaintiff brings this claim for himself individually.

75. Shield Screening compiled and prepared a consumer report on Plaintiff for employment purposes and, in doing so, inaccurately reported his misdemeanor conviction as a felony.

76. Plaintiff has never been convicted of a felony, and this grossly inaccurate report contravenes the public record information contained with the Oklahoma State Courts Network.

77. Had Shield Screening utilized, as the FCRA requires, “reasonable procedures to assure maximum possible accuracy of the information concerning the individual about whom the report relates,” Plaintiff’s report would not have included this adverse and inaccurate information.

78. Plaintiff was not hired because of the inaccurate criminal history Shield Screening included in the report it furnished to Green Country.

79. Pursuant to 15 U.S.C. § 1681o, Shield Screening is liable for negligently failing to maintain reasonable procedures to assure maximum possible accuracy of the consumer reports it sold in violation of 15 U.S.C. § 1681e(b). Plaintiff is therefore entitled to recover his actual damages, attorneys’ fees and costs under Section 1681o.

80. As a result of this conduct by Shield Screening, Plaintiff suffered actual damages, including without limitation, by example only and as described herein on his behalf by Counsel: loss of employment, damage to reputation, embarrassment, humiliation and other emotional and mental distress.

81. Alternatively, Shield Screening’s violation was willful, rendering it liable for statutory damages and punitive damages as well as attorneys’ fees and costs pursuant to 15 U.S.C. § 1681n.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff and the Class Members pray for relief as follows:

1. That an order be entered certifying the proposed Classes under Rule 23 of the Federal Rules of Civil Procedure and appointing Plaintiff and his counsel to represent the Classes;
2. That judgment be entered for the proposed Classes against Defendants for statutory damages and punitive damages for violations of 15 U.S.C. §§ 1681b(b)(3)(A) and 1681k(a) pursuant to 15 U.S.C. § 1681n. That the Court award costs and reasonable attorneys' fees, pursuant to 15 U.S.C. § 1681n;
3. That judgment be entered for Plaintiff individually against Shield Screening for actual and/or statutory damages and punitive damages, as well as costs and reasonable attorneys' fees, for violation of 15 U.S.C. § 1681e(b), pursuant to 15 U.S.C. §§ 1681n and 1681o; and
4. That the Court grant such other and further relief as may be just and proper, including but not limited to any equitable relief that may be permitted.

TRIAL BY JURY

Plaintiff hereby requests a trial by jury on those causes of action where a trial by jury is allowed by law.

DATED: October 27, 2016

Respectfully submitted,

By: /s/ Paul Catalano
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ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Shield Screen, LLC, Tulsa's Green Country Staffing Hit with FCRA Suit](#)
