



IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

MOHAMED MOHAMED,

Plaintiff,

v.

DISA GLOBAL SOLUTIONS
INC.,

Defendants.

Case No.: 4:25-cv-04649

JURY TRIAL DEMANDED

COMPLAINT

Mohamed Mohamed (“Plaintiff”) by and through his counsel brings the following Complaint against DISA Global Solutions, Inc. (“Defendant” or “DISA”).

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”).

PARTIES

2. Plaintiff is a natural person residing in Chelsea, Massachusetts and is a “consumer” as that term is defined in 15 U.S.C. § 1681a(c).

3. Defendant is a consumer reporting agency that maintains its principal place of business located at 11740 Katy Fwy Ste. 900,



Houston, Texas 77079, and is authorized to do business in the State of Texas, including within this District. Defendant DISA can be served through its registered agent, C T Corporation System, located at 1999 Bryan St., Ste. 900, Dallas, TX 75201.

JURISDICTION AND VENUE

4. This Court has jurisdiction over Plaintiff's claims pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p.

5. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2).

FACTS

6. On or about July 16, 2025, Plaintiff applied for employment as a Vehicle Cleaner with Enterprise Rent-A-Car Company of Boston, LLC ("Enterprise"), located in Chelsea, Massachusetts.

7. On or about July 23, 2025, a week after a successful interview, Plaintiff was asked to undergo a background check.

8. Enterprise contracted with Defendant to conduct background checks, including criminal background checks, on its prospective employees.

9. On or around July 28, 2025, in accordance with its standard procedures, Defendant completed its consumer report about Plaintiff and sold the same to Enterprise.

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

11. Specifically, Defendant's consumer report about Plaintiff included two grossly inaccurate and stigmatizing misdemeanor convictions from Clay County, Minnesota, which appeared in the consumer report as follows:



Criminal & Public Records					
Jurisdiction: CLAY, MN			Record Type: County Criminal		Name on Case: Mohamed, Mohamed Mohamud
Case Number	Charge	Charge Date	Charge Type	Disposition	Disposition Date
14-CR-21-3706	TRAFFIC - 3RD DEGREE DWI - OPERATE MOTOR VEHICLE - BODY CONTAINS ANY AMOUNT SCHEDULE I/II DRUGS - NO	10/25/2021	Gross Misdemeanor	Convicted	01/23/2023
Sentence Info: Local Confinement: 364 Days Time To Serve: 190 Days Stay: 174 Days For 4 Yr Credit For Time Served: 190 Days Fine \$500.00 Probation 4 years Service - Adult: Type: community work service For Indeterminate In Lieu of Fine (\$500.00)/Confinement Court Fees Follow All Court Orders and Conditions					
Identifiers: FirstName,MiddleName,LastName,DOB					

14-CR-22-13	ASSAULT-5TH DEG-INFLICT OR ATTEMPT BODILY HARM	12/30/2021	Misdemeanor	Convicted	01/23/2023
Sentence Info: Local Confinement: 90 Days Time To Serve: 90 Days Credit For Time Served: 90 Days fine \$50.00 Service - Adult: Type: community work service For Indeterminate In Lieu of Fine (\$50.00)/Confinement Court Fees Follow All Court Orders and Conditions					
Identifiers: FirstName,MiddleName,LastName,DOB					

12. The criminal convictions reported by Defendant about Plaintiff to Enterprise Holdings do not belong to Plaintiff.

13. Plaintiff has never been charged with or convicted of a crime in his life.

14. A cursory review of the widely available public court records confirms that the records belong to an unrelated stranger, Mohamed Mohamud Mohamed (the “Non-Consumer”).



15. Had Defendant actually consulted or obtained the widely available public court records regarding the two convictions, it would have seen obvious discrepancies between Non-Consumer and Plaintiff.

16. Even though Plaintiff has lived in Massachusetts for the past fifteen years the criminal records indicate the Non-Consumer resided in Minnesota.

17. The sole reason the inaccurate criminal records were 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.

18. Had Defendant followed reasonable procedures, it would have discovered that the inaccurate, stigmatizing criminal convictions belong to an unrelated individual with a different Social Security Number, and who resides in a different part of the country than Plaintiff.

19. 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 maximally accurate, in violation of 15 U.S.C. § 1681e(b).

20. On or about July 28, 2025, Plaintiff received an pre-adverse action notice from Enterprise informing him that his employment application may be denied due to the misdemeanor conviction for Driving While Impaired as reported by Defendant.

21. Attached to the notification was a copy of the subject consumer report. Upon reviewing it, Plaintiff was shocked and humiliated to discover that the criminal convictions of Non-Consumer, were attributed to him in the consumer report Defendant sold about Plaintiff to Enterprise.



22. Plaintiff was very panicked, confused, and concerned about the impact of the Non-Consumer's serious criminal convictions reported on the subject consumer report – specifically, the impact of the same on his future.

23. Specifically, Defendant matched Plaintiff and Non-Consumer and published the criminal records of Non-Consumer 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 Enterprise, but Defendant failed to perform even a cursory review of such information.

24. Desperate to secure employment with Enterprise Holdings and riddled with worry over the far-reaching impacts of being confused with a convicted misdemeanant, Plaintiff disputed the inaccurate information with Defendant on July 28, 2025 via phone.

25. Plaintiff identified himself and provided information to Defendant to support his dispute.

26. Plaintiff specifically stated that the Non-Consumer's criminal records do not belong to Plaintiff.

27. Plaintiff specifically asked Defendant to investigate and delete the Non-Consumer's criminal records from any consumer report about Plaintiff.

28. Shortly after, Plaintiff received Defendant's correspondence confirming that it had received Plaintiff's dispute and will conduct its investigation.

29. That same day, Plaintiff contacted Enterprise and informed them that Defendant's consumer report was erroneous, that he



had disputed it, and that he wished to be reconsidered for the position once Defendant corrected the report. Plaintiff explained that the serious criminal convictions of the Non-Consumer do not belong to him.

30. On or around August 6, 2025, approximately one and a half weeks after receiving Plaintiff's dispute, Defendant completed its reinvestigation, removed the erroneous criminal records from the subject consumer report, and issued a corrected background report to both Plaintiff and Enterprise.

31. Plaintiff had received an email from Enterprise, dated August 6, 2025, denying his job application based on Defendant's erroneous reporting.

32. On or around August 7, 2025, Plaintiff received a text message from Enterprise, inviting him to begin employment. Although a relief, this opportunity arose after delay, stress, and financial hardship caused by Defendant's unreasonable procedures.

33. At the time Plaintiff applied for a position with Enterprise, he was working at a part-time job and was relying on the job opportunity at Enterprise for his livelihood. Due to Defendant's inaccurate report, Plaintiff was denied employment.

34. Plaintiff's delayed start to his employment resulted in his loss of a significant amount of money, as he could have supported his mother and brothers abroad.

35. Plaintiff incurred costs for transportation, phone calls and other communications necessary to dispute the false report and follow up with Enterprise Holdings.

36. Plaintiff has suffered significant emotional distress, including anxiety, frustration and uncertainty regarding his financial security and reputation, compounded by the fear that the



inaccurate report could harm future job prospects.

37. Plaintiff spent considerable time navigating the dispute process and addressing the legal and administrative burdens of correcting the error.

38. 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.

39. As a result of Defendant's violations of the FCRA, Plaintiff has suffered a range of actual damages including, without limitation, 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 his background check report; the expenditure of labor and effort disputing and trying to correct the inaccurate reporting; damage to his 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

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

41. Defendant is a "consumer reporting agency" as defined by 15 U.S.C. § 1681a(f).



42. Plaintiff is a “consumer” as that term is defined by 15 U.S.C. § 1681a(c).

43. The above-mentioned consumer report is a “consumer report” as that term is defined by 15 U.S.C. § 1681a(d).

44. 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.

45. As a result of Defendant’s violations of the FCRA, Plaintiff has suffered a range of actual damages as described herein.

46. 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, Defendant was negligent, entitling Plaintiff to recover under 15 U.S.C. § 1681o.

47. 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: September 30, 2025,

By: /s/ Yaear Weintroub
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