STATE OF NORTH CAROLINA COUNTY OF WAKE

AFFIDAVIT OF DAVID PARKER

- I, David Parker, being first duly sworn, state as follows:
- 1. I am a resident of Wake County, North Carolina, and I have personal knowledge of the facts set forth in this affidavit.
- 2. I am currently employed as Credit Reporting Manager of Quality Assurance with the North Carolina State Employees' Credit Union ("SECU"). I have been in this position for approximately eight years and have worked with SECU for over twenty-nine years.
- 3. SECU regularly receives notification reports from Equifax that identify changes to SECU members' credit reports. These changes include the removal of negative or derogatory items that had been placed on the SECU members' credit reports by SECU, which has later been removed from members' credit reports by the agencies due to alleged inaccurate reporting by SECU or alleged fraudulent activity by third parties. As part of my job responsibilities, I routinely review these notification reports and conduct further research when warranted. If SECU determines that the original payment history or other information reported by SECU to the agencies was correct, SECU notifies the agencies of that fact so that the agencies will correct members' credit reports to accurately reflect members' payment history and identifying information.
- 4. In early 2011, while conducting my regular review of a notification report from Equifax, I noticed that many of the derogatory items that Equifax had removed from SECU

members' credit reports was due to customers' claims that they were victims of identity theft – namely, that other, unauthorized third persons had fraudulently obtained the customers' identifying information and fraudulently obtained credit under their name without their knowledge or authorization. The Equifax report further noted that the customers had reported the fraudulent activity to local law enforcement agencies, and that copies of customers' police reports had been submitted to Equifax by the customers, or on behalf of the customers, as proof of the fraudulent activity.

- 5. Equifax's report further provided certain information regarding the police reports, such as the name of the police department, the name of the reporting officer who prepared the report, and a case number. In my review, I noticed items that caused me to question the legitimacy of the police reports. For example, I noticed that many police reports although purportedly prepared by different police departments in different cities throughout North Carolina contained the same officer's name and identical case numbers.
- 6. Due to these unusual circumstances, I requested that Equifax send me copies of the actual police reports that had been provided to Equifax, where SECU members had claimed they were victims of identity theft. Equifax sent the reports to me. Upon reviewing ten to fifteen police reports, which were ostensibly from several different police departments, I observed that the case number on some of the reports was identical. In addition, in many instances, the police officer's name and ID number was the same; and several reports contained the same date. Most of the reports contained the identical language, namely that the customer was a victim of identity theft and that the derogatory items on their credit report were not their responsibility. Further, the printed format and appearance of the reports was identical even though they were purportedly

prepared by different police departments across North Carolina. The only information that changed on each police report was the victim's identifying information. These observations caused me to believe that these police reports were highly suspicious and likely fraudulent. Examples of two such purported police reports, with SECU members' names and other identifying information redacted, are attached hereto as Exhibit A.

- 7. On February 10, 2011, I discussed my concerns with Michael Banks, a SECU branch manager of the branch where a particular member, who was the subject of a suspicious police report, conducted business. Because the police report indicated that it had been prepared by the Raleigh Police Department, Mr. Banks contacted the Raleigh Police Department on February 24, 2011, and spoke with Captain Patrick Niemann. He provided Captain Niemann with a copy of the purported police report. Captain Niemann confirmed our suspicions that the report was fraudulent that is, he confirmed that the form was not one used by the department; there was no officer with that reporting officer's name or ID number; and there was no report number containing that case number.
- 8. Shortly thereafter, I and SECU Senior Vice President of Quality Assurance,
 Sidney Mabry, notified Captain Niemann that SECU had received additional fraudulent police
 reports from Equifax, some of which purported to be prepared by the Raleigh Police Department,
 and others which purported to be prepared by other departments. Captain Niemann informed us
 that the police would undertake an investigation of these fraudulent reports and notify other law
 enforcement agencies of the suspicious activity.
- 9. At SECU, we have continued to investigate this matter. In those instances where we have substantial reason to believe that a police report is fraudulent, and therefore that the

member has not actually made a report to local law enforcement of being a victim of identity theft, we have informed Equifax that SECU believes the original member information reported by SECU to be correct.

David Parker Date

Sworn to and subscribed before me

This the 20^{+10} day of July, 2011

EUMS Phlan/Erica S. Phelan (Notary Public)

My Commission Expires: TVIY 21, 2014



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