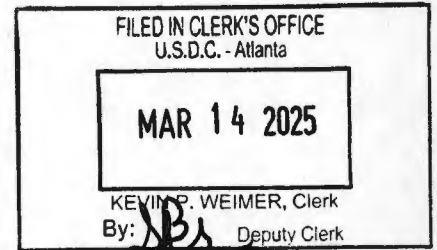


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA



THERESA MADDOX,
PLAINTIFF

JURY TRIAL DEMANDED

v.

CASE No. 1:25-CV-1354

CREDENCE RESOURCE MANAGEMENT,
DEFENDANT

COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is an action for damages brought by Plaintiff Theresa Maddox, an individual consumer, against Defendant, Credence Resource Management, for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. (hereinafter "FDCPA"), which prohibits debt collectors from engaging in abusive, deceptive, and unfair collection practices.

II. JURISDICTION AND VENUE

2. Jurisdiction of this court arises under 15 U.S.C. § 1692k(d) and 28 U.S.C. § 1331. The venue is proper in this district pursuant to 28 U.S.C. § 1391(b) because Plaintiff resides in this district, Defendant conducts business in this district, and communications giving rise to this action occurred in this district.

III. PARTIES

3. Plaintiff is a natural person residing in Snellville, GA. Plaintiff is a consumer as defined by the Fair Debt Collection Practices Act, 15 U.S.C. § 1692a(3).
4. Defendant is a corporation with its principal place of business located at 4222 Trinity Mills Suite 260 Dallas, TX 75287.
5. Defendant is engaged in the collection of debt from consumers using the mail and telephone. Defendant regularly attempts to collect consumers' debt alleged to be due to another. The alleged debt arose from a financial obligation that was primarily for personal, family, or household purposes and is therefore a "debt" as that term is defined by 15 U.S.C. § 1692a(5).

IV. FACTUAL ALLEGATIONS

6. Defendant is a "debt collector" as defined by the FDCPA, 15 U.S.C. § 1692a(6).
7. On or about December 29th, 2024, Plaintiff reviewed her credit report on "Credit Karma".
8. On the report, Plaintiff observed a trade line from Defendant.
9. Defendant furnished a trade line of \$73, allegedly owed to Xfinity Mobile.
10. On or about January 1st, 2025, Plaintiff sent a letter to Defendant via certified mail, which indicated she was disputing the tradeline.
11. Defendant received the letter on January 13th, 2025.
12. On or about February 26th, 2025, Plaintiff re-checked her credit report and observed that Defendant failed to communicate that the debt was disputed by Plaintiff.
13. Goldman Sachs Bank received Plaintiff's credit files containing the false and inaccurate tradeline.

14. Consequently, Plaintiff was denied a credit card.
15. Defendant's publishing of such inaccurate and incomplete information has severely damaged the personal and credit reputation of Plaintiff and caused severe humiliation, emotional distress, anxiety, mental anguish, damage to Fico Scores, and denials of credit.

V. COUNT I
VIOLATION OF THE FAIR DEBT COLLECTION PRACTICES ACT
15 U.S.C. § 1692e(8)
AGAINST DEFENDANT CREDENCE RESOURCE MANAGEMENT

16. Plaintiff re-alleges and reincorporates all previous paragraphs as if fully set out herein.
17. Defendant violated the FDCPA.
18. Defendant's violations include but are not limited to the following:
 - a) Defendant violated 15 U.S.C. § 1692e(8) of the FDCPA by failing to disclose to the consumer reporting agencies, including Experian, that the alleged debt was in dispute by Plaintiff.
19. As a result of the above violations of the FDCPA, Defendant is liable to Plaintiff for actual damages, statutory damages, and costs.

VI. JURY DEMAND AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully demands a jury trial and requests that judgment be entered in favor of Plaintiff and against Defendant for:

- A. Judgement for the violations occurred for violating the FDCPA;
- B. Actual damages pursuant to 15 U.S.C. § 1692k(a)(1);
- C. Statutory damages pursuant to 15 U.S.C. § 1692k(a)(2)(A);
- D. Costs pursuant to 15 U.S.C. § 1692k(a)(3);

E. For such other and further relief as the Court may deem just proper.

Respectfully Submitted,

Dated: March 14th, 2025

By: Theresa Maddox

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