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

THERESA MADDOX, PLAINTIFF	}	**JURY TRIAL DEMANDED**
v.	}	**CASE No.** 1:25-CV-1355
NCB MANAGEMENT SERVICES, INC., DEFENDANT	}	

COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is an action for damages brought by Plaintiff Theres Maddox, an individual consumer, against Defendant, NCB Management Services, Inc., 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 1 Allied Drive, Trevose, PA, 19053.

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. <u>FACTUAL ALLEGATIONS</u>

6. Defendant is a "debt collector" as defined by the FDCPA, 15 U.S.C. § 1692a(6).

7. On or about December 4th, 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 $2,899, allegedly owed Exeter Finance LLC, which displayed dispute notations.

10. On or about Janurary 1st, 2025, Plaintiff sent a letter to Defendant via certified mail which indicated she was no longer disputing this tradeline and to update her credit report as such.

11. Defendant received the letter on January 10th, 2025.

12. On or about February 21st, 2025, Plaintiff re-checked her credit report and observed that Defendant failed to communicate that the debt was no longer being 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 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 NCB MANAGEMENT SERVICES, INC.

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 communicating information to any person credit information which is known or which should be known to be false.

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;.

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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