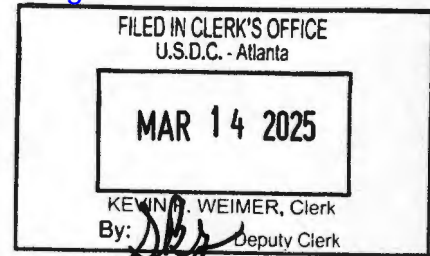


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA



THERESA MADDOX,
PLAINTIFF

v.

BOUNCE AI, INC.,
DEFENDANT

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JURY TRIAL DEMANDED

CASE No.

1:25-CV-1356

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, Bounce AI, 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 333 Metro Park, Ste S-205, Rochester, NY, 14623.
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 February 18th, 2025, Plaintiff received an email from Defendant attempting to collect a debt in the amount of \$1234.45 allegedly owed to CMBG FBC-Zebit, LLC.
8. On or about February 21st, 2025, Plaintiff replied to the email stating, "I refuse to pay.", pursuant to 15 U.S.C. § 1692c(c).
9. Despite receiving Plaintiff's notice, Defendant continued its attempt to contact Plaintiff by email on March 1st, 2025, in violation of 15 U.S.C. § 1692c(c).
10. Plaintiff received three additional emails on March 5th, 2025, March 9th, 2025, and March 13th, 2025, which constitute harassment.
11. Defendant knew Plaintiff refused to pay but continued to contact her repeatedly, in violation of 15 U.S.C. § 1692d.
12. Plaintiff fears that in the absence of this complaint, Defendant will continue to email her.

13. Plaintiff has suffered actual damages as a result of the illegal debt collection communications and harassment by Defendant in the form of anger, loss of productive time, harassment, emotional distress, and humiliation, amongst other negative emotions.

V. COUNT I
VIOLATION OF THE FAIR DEBT COLLECTION PRACTICES ACT
15 U.S.C. § 1692c(c)
AGAINST DEFENDANT BOUNCE AI, INC.

14. Plaintiff re-alleges and reincorporates all previous paragraphs as if fully set out herein.

15. Defendant violated the FDCPA.

16. Defendant's violations include but are not limited to the following:

- a) Defendant violated 15 U.S.C. § 1692c(c) of the FDCPA by failing to cease collection after receiving written notice.

17. As a result of the above violations of the FDCPA, Defendant is liable to Plaintiff for actual damages, statutory damages, and costs.

VI. COUNT II
VIOLATION OF THE FAIR DEBT COLLECTION PRACTICES ACT
15 U.S.C. § 1692d
AGAINST DEFENDANT BOUNCE AI, INC.

18. Plaintiff re-alleges and reincorporates all previous paragraphs as if fully set out herein.

19. Defendant violated the FDCPA.

20. Defendant's violations include but are not limited to the following:

- a) Defendant violated 15 U.S.C. § 1692d of the FDCPA by engaging in conduct that naturally resulted in harassing, oppressing, or abusing Plaintiff in connection with the collection of a debt.

21. As a result of the above violations of the FDCPA, Defendant is liable to Plaintiff for actual damages, statutory damages, and costs.

VII. 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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