

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ISAIAH BONNER	) JURY TRIAL DEMANDED
Plaintiff,	)
	)
v.	) Case No.
	)
ALDOUS AND ASSOCIATES, PLLC	)
Defendant.	)
	)
	)

COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is an action for actual and statutory brought by Plaintiff ISAIAH BONNER an individual consumer, against Defendant, ALDOUS AND ASSOCIATES, LLC, ("ALDOUS") 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 practices.

II. JURISDICTION AND VENUE

2. Jurisdiction of this court arises under 15 U.S.C § 1692k(d) 28 U.S.C 1331. Venue in this District is proper in that the Defendants transact business in Oakland County, Michigan, and the conduct complained of occurred in Lake Orion, Michigan.

III. PARTIES

3. Plaintiff Isaiah Bonner (hereinafter “Ms. Ellis”) is a natural person residing in Lake Orion, Michigan. Mr. Bonner is a consumer as defined by the Fair Debt Collection Practices Act, 15 U.S.C. §1692 a (3).
4. Upon information and belief, Defendant ALDOUS is a Utah corporation with its principal place of business located at 4625 S. 2300 E, Salt Lake City, UT 84117
5. Defendant ALDOUS is engaged in the collection of debt from consumers using mail and telephone. Defendant ALDOUS regularly attempts to collect consumers’ debts alleged to be due to another’s.

IV. FACTS OF THE COMPLAINT

6. Defendant ALDOUS, (hereinafter referred to as “Debt Collector”) is a “debt collector” as defined by the FDCPA, 15 U.S.C 1692 a (6).

7. On or about April 26, 2025, Mr. Bonner reviewed his credit report on "Credit Karma."
8. On the report, the Mr. Bonner observed a trade line from Debt Collector.
9. Debt Collector furnished a trade line of \$568.00 allegedly owed to POWERHOUSE GYM.
10. Also on May 16, 2025, Plaintiff mailed a letter certified via USPS, the letter stated, "I have no obligation of paying this debt, and I will not be submitting and payment partial or otherwise." The letter was received by Defendant May 22, 2025, tracking No. 9207190142980418661888; however, on May 27, 2025, Plaintiff re-checked his "Credit Karma" credit reports and Debt Collectors had has several communications with the consumer reporting agencies and all Debt Collectors did not communicate that the Plaintiff is disputing the account,
11. Debt Collector's publishing of such inaccurate and incomplete information has severely damaged the personal and credit reputation of Mr. Bonner and caused severe defamation.

V. FIRST CLAIM FOR RELIEF
(Defendant Aldous and Associates, PLLC)
15 U.S.C. §1692e(8)

12. Mr. Bonner re-alleges and reincorporates all previous paragraphs as if fully set out herein.
13. The Debt Collector violated the FDCPA.
14. The Debt Collector's violations include, but are not limited to, the following:

The Debt Collector violated 15 U.S.C § 1692e(8) of the FDCPA by publishing false information to the consumer by failing to report to the reporting agencies that alleged debt was being disputed by Mr. Bonner.
15. As a result of the above violations of the FDCPA, the Defendant is liable to M. Bonner in actual damages, statutory damages, costs, and attorney fees.

VI. JURY DEMAND AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff Mr. Bonner respectfully demands a jury trial and requests that judgment be entered in his favor and against the Debt Collector for:

- A. Judgment for the violations occurred for violating the FDCPA, 15 U.S.C § 1692e(8), which states that states that “communicating or threatening to communicate to any person credit information which is known, or which should be known to be false, including the failure to communicate that a disputed debt is disputed” is a violation of the statute.
- B. Actual damages pursuant to 15 U.S.C 1692k(a)(1)(2);
- C. Statutory damages pursuant to 15 U.S.C 1692k(a)(2);
- D. Cost and reasonable attorney’s fees pursuant to 15 U.S.C 1692k(a)(3);
- E. For such other and further relief as the Court may deem just and proper.

Respectfully submitted,

/s/ Paschal Ukpabi

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