UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Mark W. Dobronski,

Plaintiff,

Case No. 25-12252

v.

Transworld Systems Inc., **JPMorgan Chase Bank, N.A.,**

Defendants.

Mark W. Dobronski
P.O. Box 99
Dexter, Michigan 48130-0099

Dawn Williams (P72399)
DYKEMA GOSSETT PLLC
Attorneys for Defendant JPMorgan Chase Bank, N.A.
201 Townsend Street, Suite 900
Lansing, MI 48933
(616) 756-7518
dwilliams@dykema.com

NOTICE OF REMOVAL

Defendant JPMorgan Chase Bank, N.A. ("Chase") gives notice that the above-captioned action is removed from the 14A-4 Judicial District Court to the United States District Court for the Eastern District of Michigan. In support of removal, Chase states as follows:

1. On or about June 30, 2025, Plaintiff filed a Complaint in the 14A-4 Judicial District Court (the "Action"). *See* Complaint, Exhibit A.

2. This Notice of Removal is timely under 28 USC 1446(b)(3). Chase files this Notice of Removal, which sets forth the claims for relief upon which this removal is based, within thirty (30) days of service of process.

3. Co-Defendant Transworld Systems, Inc. consents to removal.

4. **Federal Question Jurisdiction.** Removal is appropriate under the Court's "federal question" jurisdiction. A party may timely remove a pending state court action to federal district court if the federal district court would have original jurisdiction. 28 U.S.C. §1441. Federal district courts have original jurisdiction over all civil actions arising under the Constitution, laws or treaties of the United States. 28 U.S.C. §1331.

5. Plaintiff's Complaint consists of four counts for violation of the Telephone Consumer Protection Act of 1991 (the "TCPA"), 47 U.S.C. § 227, *et seq.*, which is a federal act. As such, this Court has original jurisdiction pursuant to 28 U.S.C. §1331 and constitutes an independent basis for removal.

6. A Notice Regarding Removal of Action to Federal Court and a copy of this Notice of Removal will be filed with the 14A-4 District Court as required by 28 U.S.C. § 1446(d) and copies of the same will be served upon Plaintiff.

7. Based upon the foregoing, Chase is entitled to remove this action to this Court under 28 U.S.C. § 1332, *et seq.*

8. In filing this Notice of Removal, Chase does not waive any defenses that may be available.

WHEREFORE, Chase requests this Court take jurisdiction over this matter and grant such other relief as the Court deems proper.

Respectfully submitted,

DYKEMA GOSSETT PLLC

By: /s/ *Dawn Williams*
Dawn Williams (P72399)
Attorneys for Defendant JPMorgan Chase Bank, N.A.
201 Townsend Street, Suite 900
Lansing, MI 48933
(616) 756-7518
dwilliams@dykema.com

Date: July 23, 2025

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2025, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, and I hereby certify that I have mailed by first class U.S. Mail, with postage fully prepaid, the same to:

Mark W. Dobronksi
P.O. Box 99
Dexter, MI 48130-0099

/s/ Dawn Williams

EXHIBIT A

Approved, SCAO

Original - Court
1st copy - Defendant
2nd copy - Plaintiff
3rd copy - Return

STATE OF MICHIGAN 14A-4 JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY	SUMMONS	CASE NUMBER 254C0987 -GC

Court address
1000 N MAPLE RD SALINE, MI 48176-1802

Court telephone number
(734) 429-2504

Plaintiff's name, address, and telephone number		Defendant's name, address, and telephone number
MARK W. DOBRONSKI (734) 641-2300 PO BOX 99 DEXTER, MI 48130-0099	v	TRANSWORLD SYSTEMS INC. 3410 BELLE CHASE WAY STE 600 LANSING, MI 48911-4274 JPMORGAN CHASE BANK, N.A. 40600 ANN ARBOR RD E STE 201 PLYMOUTH, MI 48170-4675
Plaintiff's attorney bar number, address, and telephone number PRO SE		

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (MC 21) listing those cases.

☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.

☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).

☑ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.

☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in ☐ this court, ☐ ______________________ Court, where it was given case number ______________ and assigned to Judge ______________________

The action ☐ remains ☐ is no longer pending.

RECEIVED
JUN 30 2025
14A-1 DISTRICT COURT
ANN ARBOR

Summons section completed by court clerk. **SUMMONS**

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside of Michigan).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date	Expiration date*	Court clerk
6/30/25	9/29/25	[signature]

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

STATE OF MICHIGAN
IN THE DISTRICT COURT FOR THE 14A-4 JUDICIAL DISTRICT

MARK W. DOBRONSKI,
an individual,

Plaintiff,

v.

TRANSWORLD SYSTEMS INC.,
a California corporation; and

JPMORGAN CHASE BANK, N.A.,
a national banking association,

Defendants.

Case No. **254C0987-GC**

Honorable Karl A. Barr
District Judge

Mark W. Dobronski
Post Office Box 99
Dexter, Michigan 48130-0099
(734) 641-2300
markdobronski@yahoo.com
Plaintiff *In Propria Persona*

RECEIVED
JUN 30 2025
DISTRICT COURT

COMPLAINT

NOW COMES the Plaintiff, MARK W. DOBRONSKI, appearing *in propria persona*, and for his complaint against Defendants TRANSWORLD SYSTEMS INC. and JPMORGAN CHASE BANK, N.A. alleges:

1. This matter arises under the Telephone Consumer Protection Act of 1991 ("TCPA"), 47 U.S.C. § 227, *et seq.*

Parties

2. Plaintiff is an individual, of the age of majority, a citizen of the United States of America,

is a resident of and has a place of business in Orange County, Florida, has a residence and place of business in Washtenaw County, Michigan, and has a place of business in Wayne County, Michigan.

3. Defendant TRANSWORLD SYSTEMS INC. ("Transworld") is a corporation organized and existing under the laws of the State of California, which is registered and qualified to do business in the State of Michigan, with a registered office located at 3410 Belle Chase Way, Suite 600, Lansing, Ingham County, Michigan 48911-4274.

4. Defendant JPMORGAN CHASE BANK, N.A. ("Chase") is a national banking association, which does business, *inter alia,* in the State of Michigan, with a registered office located at 40600 Ann Arbor Road East, Suite 201, Plymouth, Michigan 48170-4675.

Jurisdiction

5. This Court has jurisdiction over the subject matter of this complaint pursuant M.C.L. § 600.8301(1).

6. This Court has limited personal jurisdiction over Defendants Transworld and Chase, pursuant to M.C.L. § 600.715, as a result of the defendant: transacting any business within the state; and/or the doing or causing any act to be done, or consequences to occur, in the state resulting in an action for tort.

Venue

7. Venue is proper in this Court, pursuant to M.C.L. § 600.1629(a)(1)(b)(i), as the tortious or illegal conduct complained of occurred in this judicial district, to wit, the illegal telemarketing calls were directed to a telephone number with a Michigan telephone area code; and the illegal telephone calls were received in Lima Township, Washtenaw County, Michigan,

Preliminary Statement

8. As the Supreme Court recently explained, "Americans passionately disagree amount many

things. But they are largely united in their disdain for robocalls." *Barr v. American Association of Political Consultants LLC*, 140 S. Ct. 2335, 2343 (2020).

9. The Federal Government receives a staggering number of complaints about robocalls – 3.7 million complaints in 2019 alone. *Id.*

10. In response to widespread public outrage over intrusive telemarketing calls to homes and businesses, the United States Congress acted to prevent persons, like Defendant, from invading American citizen's privacy and to prevent abusive "robo-calls" by enacting the TCPA.

11. According to the Federal Communications Commission ("FCC"), "Unwanted calls and texts are the number one complaint to the FCC."

12. In regard to such telephone solicitations, Senator Hollings of South Carolina, the primary sponsor of the TCPA, explained:

> "Computerized calls are the scourge of modern civilization. They wake us up in the morning; they interrupt our dinner at night; they force the sick and elderly out of bed; they hound us until we want to rip the telephone right out of the wall... these computerized telephone calls threaten our personal safety... These machines are out of control, and their use is growing by 30 percent every year. It is telephone terrorism, and it has got to stop...."

In the Matter of Rules and Regulations Implementing the TCPA, 17 FCC Rcd. 17459, 17474, 2002 WL 31084939, at *10, fn. 90 (2002), quoting 137 Cong. Rec. 30,821-30,822 (Nov. 7, 1991).

13. According to YouMail, Inc., a company which tracks robocall activity and publishes the YouMail Robocall Index, during calendar year 2023 alone, American consumers were bombarded with over 55.05 *billion* robocalls; an average of over 164 robocalls to each man, woman, and child. [Source: www.robocallindex.com].

14. In 2021, nearly 1 in 3 Americans say they have fallen victim to a phone scam in the past

year, with reported losses to phone scams exceeding $29.8 Billion. [Source: www.cndb.com/2021/06/29/americans-list-billions-of-dollars-to-phone-scams-over-the-past-year.html].

15. Congress has found that interstate telemarketing fraud has become a problem of such magnitude that the resources of the Government are not sufficient to ensure adequate consumer protection from such fraud.

16. As a result, in enacting the TCPA, Congress intentionally created a legally enforceable bounty system, not unlike *qui tam* statutes, to incentivize the assistance of aggrieved private citizens to act as "private attorneys general" in enforcing federal law.

Telephone Consumer Protection Act

17. In 1991, Congress enacted the TCPA to restrict the use of sophisticated telemarketing equipment that could target millions of consumers *en masse.* Congress found that these calls were not only a nuisance and invasion of privacy to consumers specifically, but were also a threat to interstate commence generally. *See* S. Rep. No. 102-178, at 2-3, 1991 U.S.C.C.A.N. 1968, 1969-71, 1991 WL 211220 (1991).

18. The TCPA imposes restrictions on the use of automated telephone equipment. 47 U.S.C. § 227(b)(1).

19. Pursuant to authority delegated by Congress to the FCC under the TCPA at 47 U.S.C. § 227(b)(2), the FCC has adopted regulations to implement the aforesaid restrictions on use of automated telephone equipment. The TCPA implementing regulations are promulgated at 47 C.F.R. 64.1200(a), *et seq.*

20. As part of the restrictions on use of automated telephone equipment, Congress created

a private right of action for aggrieved persons to received $500.00 in damages for *each* violation of the subsection of the statute or the regulations prescribed thereunder, which amount the court may treble if the court finds that the defendant willfully or knowingly violated the statute or the regulations. 47 U.S.C. § 227(b)(3).

General Allegations

21. Plaintiff's residential and cellular telephone lines have been besieged with telemarketing calls hawking such things as alarm systems, Google listings, automobile warranties, health insurance, life insurance, credit cards, and even financial miracles from God. Some calls are blatant scams, including calls purportedly from the Social Security Administration, the U.S. Drug Enforcement Administration, and other government agencies, claiming that arrest warrants have been issued against Plaintiff for alleged drug trafficking and money laundering activities.

22. Plainfiff's residential telephone number is ***-***-*300.

23. Plaintiff's telephone number ***-***-*300 is a telephone number which Plaintiff is charged on a per call and per minute basis.

24. Plaintiff's telephone number ***-***-*300 is listed on the National Do Not Call Registry maintained by the United States Federal Trade Commission pursuant to 16 C.F.R. Part 310 and have been so listed continuously since at least June 1, 2004 and at all times subsequent thereto and relevant hereto.

25. By listing his telephone numbers on the National Do Not Call Registry, Plaintiff has given constructive notice to the World, including each and every one of the Defendants, that Plaintiff does not wish to receive telephone solicitations or robocalls at his telephone number.

26. Plaintiff utilizes his residential telephone number ***-***-*300 primarily for personal,

household, and family related communication, and not for business communication.

27. Courts are legally bound to give great deference to the FCC's interpretations of the TCPA and its own regulations. See *FCC v. WNCN Listeners Guild*, 450 U.S. 582, 598, 101 S.Ct. 1266, 1276, 67 L.Ed.2d 521 (1981) ("the construction of a statute by those charged with its execution should be followed unless there are compelling indications that it is wrong ...").

28. The FCC has issued a declaratory ruling defining "called party" as "the subscriber, i.e., the consumer assigned the telephone number dialed and billed for the call, or the non-subscriber customary user of a telephone number included in a family or business calling plan." *In the Matter of Rules & Regulations Implementing the TCPA*, CG Docket No. 02–278, WC Docket No. 07–135, FCC 15–72, 2015 WL 4387780, at *26 ¶ 73 (2015).

29. Plaintiff is the subscriber to and a customary user of the called telephone lines, is the one that was the actual recipient of the telephone calls at issue in this complaint, and suffered the nuisance and invasion of privacy of same. Thus, Plaintiff has standing to bring this action for alleged violations of TCPA's robocall provisions. See *Leyse v. Bank of America Nat. Ass'n*, 804 F.3d 316, 324 (3rd Cir. 2015).

30. At no time relevant hereto has Plaintiff or any other authorized person requested, consented, permitted, or authorized the contact from the Defendants.

31. At no time has Plaintiff provided permission to the Defendants to engage in telephone solicitation with the Plaintiff via telephone.

32. At no time has Plaintiff provided "prior express consent" or "prior express written consent" (as those terms are defined under the TCPA and as interpreted by the FCC) for the Defendants or anyone acting on behalf of the Defendants to initiate any telephone call that includes

or introduces an advertisement or constitutes telemarketing, using an automatic telephone dialing system or an artificial or prerecorded voice, to Plaintiff's residential telephone number.

33. At no time has Plaintiff had an "established business relationship" (as that term is defined under the TCPA and as interpreted by the FCC) with the Defendant..

34. The FCC has declared that a necessary element for a person to provide "consent" is that the person must knowingly and voluntarily provide the telephone number at which they are authorizing telemarketing calls to be received at. For example, capturing a caller's telephone number by a Caller ID or ANI device cannot be considered consent to receive telemarketing calls. *In the Matter of Rules and Regulations Implementing the TCPA*, 7 FCC Rcd. 8752, 8769, 1992 WL 690928, at *11, ¶ 31 (FCC, 1992).

35. Consent cannot be "presumed." The TCPA and the Commission's rules plainly require express consent, not implied or "presumed" consent. *In re Rules and Regulations Implementing the TCPA*, 30 FCC Rcd. 7961, 7991, 2015 WL 4387780, at *20, ¶ 52 (2015).

36. The TCPA clearly requires that consumers 'opt in' before they can be contacted. *In re Rules and Regulations Implementing the TCPA*, 30 FCC Rcd. 7961, 8004, 2015 WL 4387780, at *29, ¶ 80 (2015).

37. The FCC has declared that "[p]urporting to obtain consent during the call... does not constitute the *prior* consent necessary to deliver the message in the first place as the request... is part of the telemarketing." *In re Rules and Regulations Implementing the TCPA*, 18 FCC Rcd. 14014, 14019, 2003 WL 21517853, at *49, ¶ 142 (2003) [Emphasis as in original].

38. The FCC has clarified that sellers may be held vicariously liable for violations of the TCPA by third-party telemarketers that initiate calls to market the seller's products or services,

declaring as follows:

> "[A] company on whose behalf a telephone solicitation is made bears the responsibility for any violation of our telemarketing rules and calls placed by a third party on behalf of that company are treated as if the company itself placed the call."

In re Rules and Regulations Implementing the TCPA, 20 FCC Rcd. 13664, 13667, 2005 WL 1981564, at *3, ¶ 7 (2005).

39. A seller may be liable for violations by its representatives under a broad range of agency principles, including not only formal agency, but also principles of apparent authority and ratification. *In re Dish Network,* 28 FCC Rcd. 6574, 6584, 2013 WL 1934349, at *9, ¶ 28 (2013).

40. A seller would be responsible under the TCPA for the unauthorized conduct of a third-party telemarketer that is otherwise authorized to market on the seller's behalf if the seller knew (or reasonably should have known) that the telemarketer was violating the TCPA on the seller's behalf and the seller failed to take effective steps within its power to force the telemarketer to cease that conduct. *In re Dish Network,* 28 FCC Rcd. 6574, 6592, 2013 WL 1934349, at *15, ¶ 46 (2013).

41. Pursuant to 47 U.S.C. § 217, the act, omission, or failure of any officer, agent, or other person acting for or employed by an common carrier or user, acting within the scope of his employment, shall in every case also be deemed to be the act, omission, or failure of such carrier or user as well as that of the person.

42. Parties are acting in concert when they act in accordance with an agreement to cooperate in a particular line of conduct or to accomplish a particular result. The agreement need not be expressed in words or may be implied and understood to exist from the conduct itself. Whenever two or more persons commit tortious acts in concert, each become subject to liability for the acts of the others, as well as for his own acts. In either case, the defendant's embrace of the actor's purpose or

design—whether by agreement or by action—renders the defendant liable for the underlying tort.

43. The liability of coconspirators to civil damages is joint and several. All those who, in pursuance of a common plan to commit a tortious act actively take part in it and further it by cooperation or request, or who lend aid or encouragement to the wrongdoer, or who ratify and adopt the acts done for their benefit, are equally liable with him.

44. For each and every call alleged herein initiated to Plaintiff's telephone line, Plaintiff suffered the injury of invasion of privacy and intrusion on Plaintiff's right of seclusion.

45. For each and every call alleged herein initiated to Plaintiff's telephone line, Plaintiff suffered the injury of the occupation of the telephone line by unwelcome calls, making the phone unavailable for legitimate callers or outgoing calls, including emergency calls, when the telephone line was seized by Defendants' calls.

46. For each and every call alleged herein initiated to Plaintiff's telephone line, Defendants caused an injury in the form of a nuisance and annoyance to the Plaintiff. For calls that were answered, Plaintiff had to go to the unnecessary trouble of answering them. Even for unanswered calls, Plaintiff had to deal with missed call notifications and call logs that reflected the unwanted calls. This also impaired the usefulness of these features on Plaintiff's telephone, which features are designed to inform the user of important missed communications.

47. Each and every call placed without consent by Defendants alleged herein to Plaintiff's telephone lines resulted in the injury of a trespass to Plaintiff's chattel, namely Plaintiff's telephone line and its telephone services.

48. For purposes of the TCPA, the FCC has defined "willfully or knowingly" to mean that the violator knew that he was doing the act in question, in this case, initiating a telephone

solicitation, irrespective of any intent to violate the law. A violator need not know that his action or inaction constitutes a violation; ignorance of the law is not a defense or mitigating circumstance.

The Scheme

49. Defendant Chase is a one of the Big Four banks of the United States.

50. Chase has more than 4,701 branches and 15,000 ATMs nationwide and has 18.5 million checking accounts and 25 million debit card users as of 2023.

51. Chase has more than 250,000 employees in more than 100 countries.

52. As of December 31, 2024, Chase had assets of over $4 trillion and $345 billion in stockholders' equity, which makes it the largest bank in the United States, as well as the bank with the most branches in the United States, and the only bank with a presence in all of the contiguous United States.

53. Defendant Transworld is a collection agency.

54. Chase has hired Transworld to engage in the collection of delinquent accounts receivables on behalf of Chase.

55. Chase has provided authority to Transworld to negotiate delinquent accounts receivables on behalf of Chase with Chase's debtors. For example, Chase has authorized Transworld to offer as a service to Chase's debtors a reduced pay-off amount or reduced installments in order to encourage payment on delinquent accounts receivables.

56. Chase provides Transworld with proprietary and personal identifying information regarding its debtors to Transworld in order to facilitate Transworld's collection activities on behalf of Chase.

57. Defendant Transworld utilizes telemarketing as a cost-effective method of soliciting

Chase's debtors at large in order to collect on the delinquent accounts receivables.

58. Defendant Transworld initiates telephone calls *en masse* using automated telephone dialing systems which have the capacity to store or produce telephone numbers to be called using a random or sequential number generator to dial such numbers, to solicit consumers.

59. Defendant Transworld obtain lists of names and telephone numbers of Chase's delinquent debtors located across the United States, including in Michigan, and, causes the lists to be input into their automated telephone dialing system; the automated system will then, using the random or sequential number generator, select numbers from the lists and dial them.

60. The automated telephone dialing system utilized by Defendant Transworld is designed to call a telephone number and connect a call to a telemarketing agent only after the call has been answered by a consumer, thereby reducing Defendants' labor costs; if a call goes unanswered, the number goes back into the dialer list and is then, utilizing the random number generator to select a number on the list, ready to be called again.

61. Once an initiated call has been connected to the telemarketer, Defendant Transworld's representative will query the called debtor, and as necessary, engage in its service of offering compromised payment terms to the debtor in an attempt to collect on the delinquent accounts receivables.

62. Defendant Transworld does not scrub their outbound telephone lists against the National Do Not Call Registry, and thus will indiscriminately call persons whose telephone numbers are listed on the National Do Not Call Registry.

63. Defendant Transworld does not scrub their outbound telephone lists against the Reassigned Number Database, and thus will indiscriminately call persons whose telephone number

may have previously belonged to a Chase debtor.

64. Defendant Transworld does not have a written do not call policy, as is evidenced, *infra*, by their blatant disregard of the TCPA requirements and their failure to provide same when requested.

65. A common characteristic of the use of an automatic telephone dialing system is a "click" or "boink" sound heard immediately after answering, followed by a delay, before a live representative comes onto the line. The automated telephone dialing system will only connect a live representative after a consumer has answered, thereby reducing the number of live representatives that must be employed.

66. A common problem with automatic telephone dialing systems is that they often will fail to detect a call being answered by the dialed party, thus the dialed party hears dead air or is hung up on.

67. Both Defendants Transworld and Chase are well aware of the requirements and proscriptions of the TCPA, as each have been sued on multiple occasions in federal district courts stemming from their violations of the TCPA. Despite having been so sued, the Defendants continue with their TCPA-violative misconduct.

<u>Call 1</u>

68. On April 29, 2025, at approximately 10:26 A.M., Defendant Transworld initiated a telephone call to Plaintiff's residential telephone number ***-***-*300.

69. The caller identification number displayed was 313-459-0563, with no caller identification name displayed.

70. Upon Plaintiff answering the incoming telephone call by saying "hello," Plaintiff heard

a "click" sound, and then the call disconnected.

71. The total duration of the call from time of initiation until time of termination was 7 seconds.

72. Immediately after the termination of the call, Plaintiff dialed the caller identification number displayed (313-459-0563) in an attempt to better identify the caller and to make a do-not-call demand. The call was answered by a recorded message stating "Thank you for calling Transworld Systems." A live representative came onto the line, at which time Plaintiff demanded that the caller not call Plaintiff's telephone number again. The representative demanded Plaintiff's name, which Plaintiff declined to provide; the representative hung up on Plaintiff.

Call 2

73. On May 12, 2025, at approximately 10:11 A.M., Defendant Transworld initiated a telephone call to Plaintiff's residential telephone number ***-***-*300.

74. The caller identification number displayed was 313-459-0612, with no caller identification name displayed.

75. Upon Plaintiff answering the incoming telephone call by saying "hello," Plaintiff heard a "click" sound, and then the call disconnected.

76. The total duration of the call from time of initiation until time of termination was 8 seconds.

77. Immediately after the termination of the call, Plaintiff dialed the caller identification number displayed (313-459-0612) in an attempt to better identify the caller and to make a do-not-call demand. The call was answered by a recorded message stating "Thank you for calling Transworld Systems." A live representative came onto the line, at which time Plaintiff demanded that the caller

not call Plaintiff's telephone number again. The representative demanded Plaintiff's name, which Plaintiff declined to provide; the representative hung up on Plaintiff.

Call 3

78. On May 13, 2025, at approximately 1:16 P.M., Defendant Transworld initiated a telephone call to Plaintiff's residential telephone number ***-***-*300.

79. The caller identification number displayed was 313-459-0646, with no caller identification name displayed.

80. Upon Plaintiff answering the incoming telephone call by saying "hello," Plaintiff heard a "click" sound, and then the call disconnected.

81. The total duration of the call from time of initiation until time of termination was 8 seconds.

82. Immediately after the termination of the call, Plaintiff dialed the caller identification number displayed (313-459-0646) in an attempt to better identify the caller and to make a do-not-call demand. The call was answered by a recorded message stating "Thank you for calling Transworld Systems." A live representative came onto the line, at which time Plaintiff demanded that the caller not call Plaintiff's telephone number again. The representative demanded Plaintiff's name, which Plaintiff declined to provide; the representative hung up on Plaintiff.

Call 4

83. On June 13, 2025, at approximately 10:59 A.M., Defendant Transworld initiated a telephone call to Plaintiff's residential telephone number ***-***-*300.

84. The caller identification number displayed was 313-459-0563, with no caller identification name displayed.

85. Upon Plaintiff answering the incoming telephone call by saying "hello," Plaintiff heard a "click" sound, and then the call disconnected.

86. The total duration of the call from time of initiation until time of termination was 8 seconds.

87. Immediately after the termination of the call, Plaintiff dialed the caller identification number displayed (313-459-0563) in an attempt to better identify the caller and to make a do-not-call demand. The call was answered by a recorded message stating "Thank you for calling Transworld Systems." A live representative came onto the line, at which time Plaintiff demanded that the caller not call Plaintiff's telephone number again. The representative demanded Plaintiff's name, which Plaintiff declined to provide; the representative hung up on Plaintiff.

Call 5

88. On June 27, 2025, at approximately 10:59 A.M., Defendant Transworld initiated a telephone call to Plaintiff's residential telephone number ***-***-*300.

89. The caller identification number displayed was 313-459-0646, with no caller identification name displayed.

90. Upon Plaintiff answering the incoming telephone call by saying "hello," Plaintiff heard a "click" sound, approximately 3 seconds of silence, and then a recorded message began to play stating "please hold while we connect your call...".

91. A live representative came onto the line stated that her name was Monique James and "this call is being recorded and monitored."

92. James did not immediately provide her business entity identification. In response to a request from Plaintiff, James identified her business entity as "Transworld Systems calling regarding

your Chase account."

93. Plaintiff made demand to James to be provided a copy of Transworld's written do-not-call policy; James indicated that she did not know what that was.

94. Plaintiff inquired of James as to whether she had received any training on maintaining a do-not-cal list; James indicated that she did not know what Plaintiff was talking about.

95. James passed the call to her purported supervisor who identified himself as Calvin Turner in Houston, Texas.

96. Plaintiff made demand to Turner to be provided a copy of Transworld's written do-not-call policy; Turner stated that he could not mail a copy to Plaintiff.

COUNT I
VIOLATION OF THE TCPA - 47 CFR 64.1200(a)(1)(iii)

97. Plaintiff incorporates the allegations of paragraphs 1 through 98, *supra.*

98. Each of Calls 1 through 5, *supra*, were in violation of the TCPA regulations, specifically 47 CFR 64.1200(a)(1)(iii), as Defendants initiated a telephone call using an automatic telephone dialing system or an artificial or prerecorded voice to a telephone number assigned to a service for which the called party is charged for the call without the prior express consent of the called party and there being no emergency.

99. The aforesaid violations of the TCPA were wilful and/or knowing as is evidenced by the repeated number of calls and the fact that Defendants had previously been put on notice as to their TCPA-violative conduct.

COUNT II
VIOLATION OF THE TCPA - 47 CFR 64.1200(a)(7)

100. Plaintiff incorporates the allegations of paragraphs 1 through 98, *supra.*

101. Calls 1 through 5, *supra*, were in violation of the TCPA regulations, specifically 47 CFR 64.1200(a)(7), as Defendants initiated a telephone call to Plaintiff's telephone line and a live sales representative was not available and did not speak to Plaintiff within two (2) seconds after the called person's completed greeting.

102. The aforesaid violation of the TCPA was wilful and/or knowing as is evidenced by the repeated number of overall violations.

COUNT III
VIOLATION OF THE TCPA - 47 CFR 64.1200(a)(7)(i)(A)

103. Plaintiff incorporates the allegations of paragraphs 1 through 98, *supra.*

104. Each of Calls 1 through 5, *supra*, were in violation of the TCPA regulations, specifically 47 CFR 64.1200(a)(7)(i)(A), as Defendants initiated a telephone call to Plaintiff's telephone line and a live sales representative was not available and did not speak to Plaintiff within two (2) seconds after the called person's completed greeting and did not provide a prerecorded identification disclosing that the call was for "telemarketing purposes" and state the name of the business entity, and a telephone number for such business entity that permits the called person to make a do-not-call request during regular business hours.

105. The aforesaid violation of the TCPA was wilful and/or knowing as is evidenced by the repeated number of overall violations.

COUNT IV
VIOLATION OF THE TCPA - 47 CRR 64.1200(a)(7)(i)(B)

106. Plaintiff incorporates the allegations of paragraphs 1 through 98, *supra.*

107. Each of Calls 1 through 5, *supra*, were in violation of the TCPA regulations, specifically 47 CFR 64.1200(a)(7)(i)(B), as Defendants initiated a telephone call to Plaintiff's telephone line and

a live sales representative was not available and did not speak to Plaintiff within two (2) seconds after the called person's completed greeting and did not provide an automated, interactive voice- and/or key press-activated opt-out mechanism that enables the called person to make a do-not-call request prior to terminating the call.

108. The aforesaid violations of the TCPA were wilful and/or knowing as is evidenced by the repeated number of calls.

PRAYER FOR RELIEF

WHEREFORE, the aforesaid premises considered, Plaintiff prays that this Court enter a judgment for Plaintiff and against the Defendants, jointly and severally, as follows:

A. Damages:

i. Damages for violations of the TCPA alleged:

Count	Violations
I	5
II	5
III	5
IV	5

A total of 20 violations, at $500.00 per violation, for damages of $10,000.00, which amount shall be trebled because the violations were willful and/or knowing, for total damages of $30,000.00.

Plaintiff remits damages in excess of $25,000.00 in order to remain within the jurisdiction of the state district court. In the event of removal of this action from the state district court, Plaintiff rescinds the aforesaid remittitur.

B. An award of Plaintiff's taxable costs and disbursements incurred in the filing and prosecution of this action;

C. An injunction enjoining Defendant from initiating any telephone calls to Plaintiff's residential telephone and cellular telephone lines.

D. Interest accruing from the date of filing until paid at the statutory rate; and,

E. Such other and further relief as this Court deems necessary, reasonable, prudent and proper under the circumstances.

Respectfully submitted,

Dated: June 30, 2025

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Plaintiff *In Propria Persona*