UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

Kevin Coleman, Plaintiff(s), -v.- R.A. Rogers, Inc., Defendant(s).	Case No. 3:25cv951

CIVIL ACTION COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff Kevin Coleman (hereinafter, "Plaintiff"), a Virginia resident, brings this Civil Action Complaint by and through his attorneys, Meridian Law, LLC, against Defendant R.A. Rogers, Inc. (hereinafter "Defendant" or "RAR") based upon information and belief of Plaintiff's counsel, except for allegations specifically pertaining to Plaintiff, which are based upon Plaintiff's personal knowledge.

INTRODUCTION/PRELIMINARY STATEMENT

1. Congress enacted the Fair Debt Collection Practices Act (hereinafter "the FDCPA") in 1977 in response to the "abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many debt collectors." 15 U.S.C. §1692(a). At that time, Congress was concerned that "abusive debt collection practices contribute to the number of personal bankruptcies, to material instability, to the loss of jobs, and to invasions of individual privacy." *Id.* Congress concluded that "existing laws…[we]re inadequate to protect consumers," and that "'the effective collection of debts" does not require "misrepresentation or other abusive debt collection practices." 15 U.S.C. §§ 1692(b) and (c).

2. Congress explained that the purpose of the Act was not only to eliminate abusive debt collection practices, but also to "insure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged." 15 U.S.C. § 1692(e). After determining that the existing consumer protection laws were inadequate, 15 U.S.C. § l692(b), Congress gave consumers a private cause of action against debt collectors who fail to comply with the Act. 15 U.S.C. § 1692k.

JURISDICTION AND VENUE

3. The Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1692k(d). The Court has pendent jurisdiction over the State law claims in this action pursuant to 28 U.S.C. § 1367(a).

4. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(2) as this is where the Plaintiff resides as well as where a substantial part of the events or omissions giving rise to the claim occurred.

NATURE OF THE ACTION

5. Plaintiff brings this action under §1692 et seq. of Title 15 of the United States Code, commonly referred to as the Fair Debt Collections Practices Act ("FDCPA").

6. Plaintiff is seeking damages and declaratory relief.

PARTIES

7. Plaintiff is a resident of the State of Virginia in the County of Richmond.

8. Rogers is a "debt collector" as the phrase is defined in 15 U.S.C. § 1692(a)(6) and used in the FDCPA with its principal place of business located at 2135 Espey Ct.. Ste. 7, Crofton, Maryland 21114.

9. Upon information and belief, Defendant RAR is a company that uses the mail, telephone, e-mail and facsimile and regularly engages in business, the principal purpose of which is to attempt to collect debts alleged to be due another.

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FACTUAL ALLEGATIONS

11. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs numbered above herein with the same force and effect as if the same were set forth at length herein.

12. Some time prior to November 19, 2024, Plaintiff allegedly incurred an obligation with Pentagon Federal Credit Union ("Pentagon").

13. The alleged Pentagon debt arose out of transactions in which money, property, insurance or services were the subject transactions used to purchase items primarily for personal, family, or household purposes, more specifically, Plaintiff's utilization of Pentagon's credit services.

14. The alleged Pentagon obligation is a "debt" as defined by 15 U.S.C. § 1692a(4) and as defined by 12 C.F.R. § 1006.2(h).

15. Pentagon is a "creditor" as defined by 15 U.S.C. § 1692a(4) and as defined by 12 CFR § 1006.2(g).

16. Upon information and belief, Pentagon contracted with Defendant RAR to collect the alleged debt.

17. Defendant collects and attempts to collect debts incurred or alleged to have been incurred for personal, family or household purposes on behalf of creditors using the United States Postal Services, e-mail, telephone, and internet.

Violation – November 19, 2024 Collection Letter Sent to Third Party

18. On or about November 19, 2024, Defendant RAR attempted to send Plaintiff a collection letter ("Letter") regarding the alleged debt currently owed to Pentagon.

19. The letter states in relevant part as follows:

> Your account with a balance of $16,060.50 with the above referenced creditor has been placed with R.A Rogers, Inc for collection.
>
> As of November 19, 2024, you owe: $16,060.50

20. The Plaintiff disputes that all or part of this debt is owed.

21. More importantly this letter was sent to an address located in Ruther Glen, Virginia. *Id.*

22. The Plaintiff did NOT reside at that address in Ruther Glen, Virginia at the time the letter was sent.

23. The Plaintiff has never resided at this address, nor provided this address to the original creditor or the Defendant.

24. The aforementioned letter was NOT sent to the Plaintiff, rather it was sent to the address of Plaintiff's brother.

25. The Plaintiff's brother has no connection to the alleged debt.

26. The Plaintiff does not live and has never lived in the same residence as his brother.

27. The Plaintiff did not even live in Ruther Glen, Virginia at the time of the alleged debt.

28. Defendant had no reason to believe that Plaintiff appointed his brother as an agent to receive mail correspondence for the alleged debt.

29. Defendant in their attempt to collect the alleged debt, sent the letter to an outside third party in direct violation of § 1692c.

30. Defendant's attempt to collect a debt, from a party who was not the owner of the debt, confused and misled the Plaintiff.

31. A debt collection company acting in a manner that is far from professional, understandably gave Plaintiff cause for concern and caused him to question the validity and veracity of the alleged debt.

32. Further, Defendant's attempt to collect a debt from Plaintiff, but instead sending notice to an outside third party, constitutes unfair and unconscionable means to collect a debt.

33. Defendant's attempt to collect a debt from Plaintiff, who was not the owner of the debt, was deceptive and misleading and caused shame and embarrassment to the Plaintiff.

34. As a result of Defendant's deceptive, misleading and unfair debt collection practices, Plaintiff has been damaged.

COUNT I
VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT 15 U.S.C. §1692c *et seq.*

35. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs above herein with the same force and effect as if the same were set forth at length herein.

36. Defendants' debt collection efforts attempted and/or directed towards the Plaintiff violated various provisions of the FDCPA, including but not limited to 15 U.S.C. § 1692c.

37. Pursuant to 15 U.S.C. § 1692c, a debt collector may not communicate in connection with the collection of any debt, with any person other than the consumer, his attorney, a

consumer reporting agency if otherwise permitted by law, the creditor, the attorney of the creditor, or the attorney of the debt collector.

38. Defendants violated 15 U.S.C. § 1692c by:

a. sending the dunning Letter to an outside third party rather than the Plaintiff.

39. By reason thereof, Defendant is liable to Plaintiff for judgment that Defendant's conduct violated Section 1692c et seq. of the FDCPA, actual damages, statutory damages, costs and attorneys' fees.

COUNT II
VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT 15 U.S.C. §1692e *et seq.*

40. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs above herein with the same force and effect as if the same were set forth at length herein.

41. Defendant's debt collection efforts attempted and/or directed towards the Plaintiff violated various provisions of the FDCPA, including but not limited to 15 U.S.C. § 1692e.

42. Pursuant to 15 U.S.C. § 1692e, a debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt.

43. Defendant violated § 1692e by:

a. sending the dunning Letter to an outside third party; and

b. making false and misleading representations in violation of § 1692e(10).

44. By reason thereof, Defendant is liable to Plaintiff for judgment that Defendant's conduct violated Section 1692e et seq. of the FDCPA, actual damages, statutory damages, costs and attorneys' fees.

COUNT III
VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT 15 U.S.C. §1692f *et seq.*

45. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs above herein with the same force and effect as if the same were set forth at length herein.

46. Defendant's debt collection efforts attempted and/or directed towards the Plaintiff violated various provisions of the FDCPA, including but not limited to 15 U.S.C. § 1692f.

47. Pursuant to 15 U.S.C. §1692f, a debt collector may not use any unfair or unconscionable means in connection with the collection of any debt.

48. Defendant violated this section by:

c. sending the dunning Letter to an outside third party.

49. By reason thereof, Defendant is liable to Plaintiff for judgment that Defendant's conduct violated Section 1692f *et seq.* of the FDCPA, actual damages, statutory damages, costs and attorneys' fees.

DEMAND FOR TRIAL BY JURY

50. Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Kevin Coleman, demands judgment from Defendant R.A .Rogers, Inc., as follows:

a. Awarding Plaintiff statutory damages;

b. Awarding Plaintiff actual damages;

c. Awarding Plaintiff costs of this Action, including reasonable attorneys' fees and expenses;

d. Awarding pre-judgment interest and post-judgment interest; and

e. Awarding Plaintiff such other and further relief as this Court may deem just and proper.

Dated: November 18, 2025

Respectfully Submitted,

/s/ Aryeh E. Stein
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