IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

ALBERT LARSEN, III, Plaintiff, v. FAIR COLLECTIONS & OUTSOURCING, INC., Defendant.	CIVIL ACTION FILE NO.:_______________ **JURY TRIAL DEMANDED**

COMPLAINT

Plaintiff, Albert Larsen, III, ("Plaintiff"), by counsel, hereby files his Complaint ("Complaint") against Defendant Fair Collections & Outsourcing, Inc. ("Defendant"), as follows:

INTRODUCTION

1. This is an action seeking redress for Defendant's violations of the Fair Credit Reporting Act, 15 U.S.C. §1681, *et seq*. ("FCRA") and the Fair Debt Collection Practices Act, 15 U.S.C. 1692, *et seq*. ("FDCPA").

2. Plaintiff, an individual, is the victim of identity theft.

3. Defendant, a foreign corporation, is a debt collector governed by the FCRA and FDCPA.

4. Defendant sought to collect a consumer debt from Plaintiff under its partial account number xxx4040 ("Debt") that did not belong to him. The Debt is apparently for the rental of a house or apartment in Maryland, and the original creditor was Invitation Homes. The amount of the Debt is $27,047.00.

5. Defendant reported the Debt to one or more of the national credit reporting agencies – Equifax, Trans Union, and Experian ("CRAs") – to be included on Plaintiff's credit reports.

6. Plaintiff thereafter disputed the false and inaccurate Debt with the CRAs. Defendant failed conduct a reasonable investigation of each dispute and continues to report the inaccurate Debt to one or more of the CRAs under Plaintiff's name. Defendant is reporting the Debt to one or more of the CRAs as delinquent. Plaintiff has been harmed as a result of Defendant's conduct.

7. Defendant's conduct violated the FCRA and the FDCPA as set forth below.

PARTIES, JURISDICTION, AND VENUE

8. Plaintiff is a natural person and a "consumer" under the FCRA and FDCPA. He resides in this District.

9. At all times material to this action, Defendant was a foreign corporation registered to do business in this District and conducting business in this District. Defendant is a "furnisher" of information as that term is used in the FCRA. Defendant is a debt collector under the FDCPA.

10. Defendant may be served with a copy of this Complaint and accompanying Summons through its registered agent for service, to wit: Corporation Service Company, Inc., 641 South Lawrence Street, Montgomery, AL 36104.

11. This Court has federal question subject matter jurisdiction pursuant to 28 U.S.C. § 1331.

12. Venue lies properly in this District and Division pursuant to 28 U.S.C. § 1391(b)(2) as Defendant conducts business in this District and Division, is registered to do

business in this District and Division, and a substantial portion of events or omissions giving rise to the claims occurred in this District and Division.

13. Defendant is subject to the jurisdiction of this Court.

FACTUAL ALLEGATIONS

14. Plaintiff did not incur the Debt. He did not live in Maryland nor rent any property from Invitation Homes. He does not know who opened the fraudulent Debt under his name.

15. Defendant sought to collect the Debt from Plaintiff. Defendant's collection efforts included reporting the Debt to the CRAs. Defendant reported the Debt to the CRAs to coerce Plaintiff to pay it.

16. Within the two years prior to the filing of this Complaint, Plaintiff disputed the Debt reported by Defendant with the CRAs ("Disputes"). Plaintiff included a police report he had obtained wherein he reported to the police that he was not responsible for the Debt.

17. The CRAs received Plaintiff's Disputes and, upon information and belief, forwarded them to Defendant.

18. Defendant received Plaintiff's Disputes from the CRAs.

19. Upon information and belief, Defendant received the police report from the CRAs.

20. Defendant was required, under the FCRA, to undertake a reasonable investigation of Plaintiff's Disputes.

21. Defendant did not contact Plaintiff as part of any such investigations.

22. Defendant responded to Experian that the Debt was accurate and should remain on Plaintiff's Experian credit file. This was false. The Debt was not accurate and did not belong to Plaintiff.

23. Defendant responded to Trans Union that the Debt was accurate and should remain on Plaintiff's Trans Union credit file. This was false. The Debt was not accurate and did not belong to Plaintiff.

24. As a result of Defendant's false and inaccurate credit reporting of the Account, and its flawed investigations of his Disputes, Plaintiff has suffered harm. Defendant's continued collection efforts directed toward Plaintiff have caused him to suffer harm.

25. As a result of Defendant's wrongful conduct set forth above, Plaintiff has suffered harm to his credit reputation and credit score; emotional distress arising from having Defendant report the inaccurate Debt about him to the CRAs and watching his credit score drop as a result; reputational harm caused by Defendant representing to the CRAs that Plaintiff was delinquent on the Debt; and time, expense, and effort to have the inaccurate Debt removed from his credit files.

26. Plaintiff has also had to retain counsel to protect his rights.

COUNT ONE:

Defendant's Violations of the FCRA

27. Plaintiff incorporates and realleges the Paragraphs set forth above.

28. Defendant negligently, or in the alternative recklessly and/or willfully, violated 15 U.S.C. § 1681s-2(b) by failing to conduct a reasonable investigation of the Plaintiff's Disputes.

29. As a result, Plaintiff has suffered and is entitled to recover actual damages as alleged above in an amount to be proven at trial as allowed by 15 U.S.C. § 1681n(a)(1)(A) or 15 U.S.C. § 1681o(a)(1).

30. As a result of Defendant's reckless and willful violations of 15 U.S.C. § 1681s-2(b), Plaintiff is entitled to recover statutory damages in the amount of $1,000 as allowed by 15 U.S.C. § 1681n(a)(1)(A).

31. As a result of Defendant's reckless and willful violations of 15 U.S.C. 1681s-2(b), Plaintiff is also entitled to recover punitive damages as allowed by 15 U.S.C. 1681n(a)(2).

32. Plaintiff is also entitled to recover her costs of this action and reasonable attorney's fees as allowed by 15 U.S.C. 1681n(a)(3) or 15 U.S.C. 1681o(a)(2).

COUNT TWO:

Defendant's Violations of the FDCPA

33. Plaintiff incorporates and realleges the Paragraphs set forth above.

34. Defendant negligently, or in the alternative recklessly and/or willfully, violated 15 U.S.C. § 1692e by using misleading representations in connection with the collection of the Debt and making false representations concerning the legal status of the Debt.

35. As a result, Plaintiff has suffered and is entitled to recover actual damages and statutory damages in an amount to be proven at trial as allowed by 15 U.S.C. § 1692k.

36. Plaintiff is also entitled to recover his costs of this action and reasonable attorney's fees under the FDCPA.

WHEREFORE, Plaintiff requests the following relief:

1. That he have a jury trial on his claims herein;
2. an award of actual damages;
3. an award of statutory damages;
4. an award of punitive damages;
5. an award of his costs and reasonable attorney's fees; and,
6. all other relief the Court deems just and proper.

Dated: December 18, 2025.

Respectfully submitted,

/s/ Kirkland E. Reid
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