

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

APR 30 2026

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
Northern JONESBORO DIVISION**

TAMMY H. DOWNS, CLERK
By:  **DEP CLERK**

JUSTIN JONES,
PLAINTIFF,

v.

NATIONAL ACTION RESOLUTIONS GROUP, LLC,
CETERIS PORTFOLIO SERVICES, LLC,
and CHARLES J. JOHNSON, JR.
DEFENDANTS

CASE NO.: 3:26-cv-127-DPM

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff Justin Jones ("Plaintiff"), by and through his undersigned counsel, brings this lawsuit against National Action Resolutions Group, LLC ("NARG") and Ceteris Portfolio Services, LLC ("Ceteris") and Charles J. Johnson, Jr., individually ("Johnson") alleges as follows:

1. This action arises out of the violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (hereinafter referred to as "FDCPA") and the Arkansas Fair Debt Collection Practices Act, Ark. Code Ann. § 17-24-101, *et seq.*, by NARG and Ceteris and Johnson.

JURISDICTION AND VENUE

2. Jurisdiction of this Court arises under 28 U.S.C. § 1331 and 15 U.S.C. § 1692k(d).
3. Supplemental Jurisdiction exists pursuant to 28 U.S.C. § 1367.
4. Venue is proper before this Court pursuant to 28 U.S.C. § 1391(b), where the acts and transactions giving rise to Plaintiffs' action occurred in this State and this District and where Plaintiffs reside in this State and this District.

PARTIES

5. Plaintiff is a natural person, who at all relevant times resided in Craighead County, Arkansas.
6. NARG is a New York company operating from 6523 S. Transit Rd., Lockport, NY 14094, according to one or more government filings.
7. NARG can be served in the state of Arkansas via its registered agent, Corporation Service Company, at 300 S. Spring St., Suite 900, Little Rock, AR 72201, or wherever it may be found in accordance with Arkansas or New York law or the Federal Rules of Civil Procedure.
8. Ceteris is a Delaware limited liability company operating from 28820 Mound Road, Warren, MI 48092 according to its most recent filing with the Arkansas Secretary of State.
9. Ceteris can be served in the state of Arkansas via its registered agent, Corporation Service Company, at 300 S. Spring Street, Suite 900, Little Rock, AR 72201, or as otherwise authorized by the laws of the state of New York or Delaware or Michigan or otherwise in accordance with the Federal Rules of Civil Procedure.
10. Johnson is a natural person, believed to be residing at 7242 Lincoln Ave Ext, Lockport, NY 14094.
11. Johnson may be served wherever he may be found in accordance with New York or Arkansas law or the Federal Rules of Civil Procedure.
12. Johnson is a member and owner of NARG, according to one or more government filings by NARG.

FACTUAL ALLEGATIONS

13. At some time in the past, Plaintiff allegedly incurred a financial obligation that was primarily for personal, family or household purposes, namely an amount due and owing on a personal loan account (hereinafter the "Account"). Specifically, the account was a loan obtained from a payday lender, the funds from which were used to pay for various personal effects but were not used for any business or commercial purposes.
14. The Account allegedly defaulted prior to being sold or otherwise transferred to NARG for collection.
15. The Account constitutes a "debt" as that term is defined by 15 U.S.C. § 1692a(5) and Ark. Code Ann. § 17-24-502(4).
16. Plaintiff is a "consumer" as defined by 15 U.S.C. § 1692a(3) and Ark. Code Ann. § 17-24-502(2).
17. As will be described below, Ceteris, or someone acting on its behalf, communicated with Plaintiff for the purpose of collecting an allegedly defaulted financial obligation.
18. The principal purpose of Ceteris is the collection of debts using the mails and telephone and other means.
19. Ceteris regularly collects or attempts to collect, directly or indirectly, debts owed or due or asserted to be owed or due another that arose out of transactions in which the money, property or services which are the subject of the transactions are primarily for personal, family or household purposes.
20. Ceteris is a "debt collector" as that term is defined by 15 U.S.C. § 1692a(6) and Ark. Code Ann. § 17-24-502(5)(A).

21. As will be described below, NARG communicated with Plaintiff and relatives as part of its attempts to collect the balance of the Account from Plaintiff.

22. NARG advertises on its website (<https://www.nargllc.com/>) (last visited March 17, 2026):

National Action Resolution Group is a full-service Debt Collection Agency located in Lockport, NY assisting clients and customers nationwide. We specialize in providing custom debt recovery solutions for consumers on the path to financial reconciliation with affordable solutions.

23. The principal purpose of NARG is the collection of debts by using the mails and telephone and other means.

24. NARG regularly collects or attempts to collect, directly or indirectly, debts owed or due or asserted to be owed or due another that arose out of transactions in which the money, property, or services which are the subject of the transactions are primarily for personal, family or household purposes.

25. NARG is a “debt collector” as that term is defined by 15 U.S.C. § 1692a(6) and Ark. Code Ann. § 17-24-502(5)(A).

26. Johnson actively manages NARG and directs the policies of the company.

27. Johnson applied for and was granted a collection agency manager’s license in one or more states as part of NARG’s effort to obtain a collection agency license in those states.

28. At all times relevant hereto, Johnson directed the employees and agents of the other defendants to act in the manner they acted as described below when attempting collections from Plaintiff.

29. Johnson regularly collects or attempts to collect, directly or indirectly, debts owed or due or asserted to be owed or due another. Johnson uses interstate commerce and the mails in a business the principal purpose of which is the collection of debts.

30. Johnson is a “debt collector” as that term is defined by 15 U.S.C. § 1692a(6) and Ark. Code Ann. § 17-24-502(5)(A).
31. During the one year prior to the date of the filing of this Complaint, on or about January 28, 2026, NARG sent a text message to Plaintiff’s brother that informed Plaintiff’s brother that NARG was looking to “speak with [Plaintiff]..or an attorney today” and identified the sender as a “claims manager” for “N.A.R.G” and provided a phone number where NARG could be reached.
32. The language used by NARG in this text message to Plaintiff’s brother unlawfully disclosed information about the status of Plaintiff’s Account to Plaintiff’s brother.
33. Plaintiff was humiliated and embarrassed to know that NARG had informed his brother that a “claims manager” from NARG was looking to talk to Plaintiff’s “attorney.”
34. NARG also communicated with Plaintiff’s sister in a manner that unlawfully disclosed information about the status of Plaintiff’s Account to Plaintiff’s sister.
35. NARG did not have Plaintiff’s consent to communicate with his brother or his sister in connection with its attempts to collect a debt from Plaintiff.
36. NARG intended for Plaintiff to be humiliated by these communications with Plaintiff’s brother in order to cause Plaintiff to send NARG money to avoid further humiliation.
37. NARG sent Plaintiff a text message directly that stated there was an upcoming deadline of “this Friday” for Plaintiff to agree to a repayment of the Account and said that the deadline was for “filing purposes.”
38. NARG sent Plaintiff another text message that said or implied that the current creditor on the Account was “ready to proceed” and that NARG had been asked to outsource the “case” against Plaintiff for “further action.”

39. NARG sent yet another text message that stated “voluntary options on this case are now null and void, and a recommendation will be made to proceed and process the claim for recovery. Good luck!”
40. The language used by NARG in its communications with Plaintiff was false and misleading and was intended to cause Plaintiff to believe that a lawsuit imminently would be filed if he did not immediately agree to repay the Account.
41. At the time NARG made the statements described above, NARG had no present intention of suing Plaintiff on the Account.
42. The language used by NARG in its communications with Plaintiff would cause the least sophisticated consumer to believe that a lawsuit imminently would be filed if he did not immediately agree to repay the Account.
43. In fact, NARG has not sued any Arkansan in the Arkansas courts for an alleged breach of contract in the past decade.
44. The statements and implications that NARG would sue Plaintiff were false, misleading and deceptive and misrepresented the legal status of the Account and misrepresented the services rendered by NARG.
45. NARG did not, in any communication with Plaintiff, inform Plaintiff that the company was a debt collector.
46. NARG did not, in its first communication with Plaintiff, inform Plaintiff that the communication was an attempt to collect a debt and that any information obtained would be used for the purpose of debt collection.
47. NARG did not inform Plaintiff of his rights to dispute the debt it was attempting to collect from him or to request validation of the debt.

48. NARG's purpose for all of the communications with Plaintiff described above and all others was to attempt to collect the Account.

49. Ceteris knew that NARG repeatedly or continuously engaged in collection practices as described above.

50. Ceteris had actual knowledge that NARG repeatedly or continuously engaged in unlawful collection practices as described above.

51. Ceteris approved and/or ratified the unlawful collection practices of NARG as described above.

52. Ceteris profits from the repeated and continued unlawful collection practices of NARG.

53. All of the conduct by NARG and/or Ceteris and/or their respective employees and/or agents alleged in the preceding paragraphs was done knowingly and willfully.

54. During all times pertinent hereto, Johnson (a) created the collection policies and procedures used by NARG, and its employees and agents, in connection with their common efforts to collect consumer debts, (b) managed or otherwise controlled the daily collection operations of NARG, (c) oversaw the application of the collection policies and procedures used by NARG and its employees and agents, (d) drafted, created, approved and ratified the tactics and scripts used by NARG and its employees and agents to collect debts from consumers, including the tactics and scripts that were used to attempt to collect an alleged debt from Plaintiff as alleged in this complaint, (e) ratified the unlawful debt collection practices and procedures used by NARG and its employees and agents in connection with their common efforts to collect consumer debts, and (f) had knowledge of, approved, participated in, ratified and benefitted financially from the unlawful debt

collection practices used by NARG and its employees and agents in attempts to collect an alleged debt from Plaintiff as alleged in this complaint.

55. All of the conduct by NARG described above was done knowingly and willfully.

56. As a direct and proximate result of the aforesaid actions, Plaintiff suffered actual damages, including but not limited to emotional distress damages related to worry, anxiety, loss of sleep, loss of appetite and distraction from normal life.

57. As a consequence of Defendants' collection activities and communication(s), Plaintiff seeks damages and attorneys fees and costs pursuant to 15 U.S.C. § 1692k and Ark. Code Ann. § 17-24-512.

RESPONDEAT SUPERIOR

58. The representative(s) and/or collector(s) at NARG were employee(s) and/or agent(s) of NARG and/or Johnson at all times mentioned herein.

59. The representative(s) and/or collector(s) at NARG were acting within the course and/or scope of their employment at all times mentioned herein.

60. The representative(s) and/or collector(s) at NARG were under the direct supervision and/or control of NARG and/or Johnson at all times mentioned herein.

61. The actions of the representative(s) and/or collector(s) at NARG are imputed to their employer, NARG and/or Johnson.

62. The representative(s) and/or collector(s) at Ceteris were employee(s) and/or agent(s) of Ceteris at all times mentioned herein.

63. The representative(s) and/or collector(s) at Ceteris were acting within the course and/or scope of their employment at all times mentioned herein.

64. The representative(s) and/or collector(s) at Ceteris were under the direct supervision and/or control of Ceteris at all times mentioned herein.
65. The actions of the representative(s) and/or collector(s) at Ceteris are imputed to their employer, Ceteris.
66. NARG and/or Johnson acted at all times as an agent of Ceteris at all times mentioned herein.
67. The actions and inactions of NARG and/or Johnson, and their respective employees and agents, are imputed to their principal, Ceteris.

COUNT I: VIOLATIONS OF THE FDCA 15 U.S.C. § 1692, et seq.
BY NATIONAL ACTION RESOLUTIONS GROUP, LLC

68. The previous paragraphs are incorporated into this Count as if set forth in full.
69. The act(s) and omission(s) of NARG and their respective representative(s), employee(s) and/or agent(s) violated 15 U.S.C. §1692c(b) and 15 U.S.C. §1692d(2)&(5)&(6) and 15 U.S.C. §1692e(2)&(3)&(4)&(5)&(7)&(8)&(9)&(10)&(11) and 15 U.S.C. § 1692g.
70. Pursuant to 15 U.S.C. § 1692k Plaintiff seeks damages, reasonable attorney's fees and costs from NARG.

COUNT II: VIOLATIONS OF THE ARKANSAS CODE ANNOTATED
BY NATIONAL ACTION RESOLUTIONS GROUP, LLC

71. The previous paragraphs are incorporated into this Count as if set forth in full.
72. The act(s) and omission(s) of NARG and their respective representative(s), employee(s) and/or agent(s) violated Ark. Code Ann. § 17-24-504(b) and § 17-24-505(b)(2)& (5)&(6) and § 17-24-506(b)(2)&(3)&(4)&(5)&(7)&(8)&(9)&(10)&(11) and § 17-24-508(a).
73. Pursuant to Ark. Code Ann. § 17-24-512, Plaintiffs seek actual damages, statutory damages, reasonable attorney's fees and costs from NARG.

COUNT III: INVASION OF PRIVACY (INTRUSION ON SECLUSION)
BY NATIONAL ACTION RESOLUTIONS GROUP, LLC

74. In the alternative, without waiving any of the other causes of action herein, without waiving any procedural, contractual, statutory, or common-law right, and incorporating all other allegations herein to the extent they are not inconsistent with the cause of action pled here, NARG is liable to Plaintiff for colluding with Ceteris and/or Johnson to invade Plaintiff's privacy (intrusion on seclusion). NARG intentionally caused the intrusion upon Plaintiff's solitude, seclusion, or private affairs, and such intrusion would be highly offensive to a reasonable person.
75. Plaintiff suffered actual damages from NARG as a result of the intrusion on Plaintiff's privacy.

COUNT IV: VIOLATIONS OF THE FDCA 15 U.S.C. § 1692, et seq.
BY CETERIS PORTFOLIO SERVICES, LLC

76. The previous paragraphs are incorporated into this Count as if set forth in full.
77. By influencing and/or controlling and/or ratifying and/or profiting from the conduct of NARG, and/or via respondeat superior theory, Ceteris is liable for the act(s) and omission(s) of NARG and its representative(s), employee(s) and/or agent(s) for violations of 15 U.S.C. §1692c(b) and 15 U.S.C. §1692d(2)&(5)&(6) and 15 U.S.C. §1692e(2)&(3)&(4)&(5)&(7)&(8)&(9)&(10)&(11) and 15 U.S.C. § 1692g.
78. Pursuant to 15 U.S.C. § 1692k Plaintiff seeks damages, reasonable attorney's fees and costs from Ceteris.

COUNT V: VIOLATIONS OF THE ARKANSAS CODE ANNOTATED
BY CETERIS PORTFOLIO SERVICES, LLC

79. The previous paragraphs are incorporated into this Count as if set forth in full.

80. By influencing and/or controlling and/or ratifying and/or profiting from the conduct of NARG, and/or via respondeat superior theory, Ceteris is liable for the act(s) and omission(s) of NARG and its representative(s), employee(s) and/or agent(s) for violations of Ark. Code Ann. § 17-24-504(b) and § 17-24-505(b)(2)& (5)&(6) and § 17-24-506(b)(2)&(3)&(4)&(5)&(7)&(8)&(9)&(10)&(11) and § 17-24-508(a).
81. Pursuant to Ark. Code Ann. § 17-24-512, Plaintiff seeks damages, reasonable attorney's fees and costs from Ceteris.

COUNT VI: INVASION OF PRIVACY (INTRUSION ON SECLUSION)
BY CETERIS PORTFOLIO SERVICES, LLC

82. In the alternative, without waiving any of the other causes of action herein, without waiving any procedural, contractual, statutory, or common-law right, and incorporating all other allegations herein to the extent they are not inconsistent with the cause of action pled here, Ceteris is liable to Plaintiff for colluding with NARG and/or Johnson to invade Plaintiff's privacy (intrusion on seclusion). Ceteris intentionally caused the intrusion upon Plaintiff's solitude, seclusion, or private affairs, and such intrusion would be highly offensive to a reasonable person.
83. Plaintiff suffered actual damages from Ceteris as a result of the intrusion on Plaintiff's privacy.

COUNT VII: VIOLATIONS OF THE FDCPA 15 U.S.C. § 1692, et seq.
BY CHARLES J. JOHNSON, JR.

84. The previous paragraphs are incorporated into this Count as if set forth in full.
85. The act(s) and omission(s) of Stone and his representative(s), employee(s) and/or agent(s) violated 15 U.S.C. §1692c(b) and 15 U.S.C. §1692d(2)&(5)&(6) and 15 U.S.C. §1692e(2)&(3)&(4)&(5)&(7)&(8)&(9)&(10)&(11) and 15 U.S.C. § 1692g.

86. Pursuant to 15 U.S.C. § 1692k Plaintiff seeks damages, reasonable attorney's fees and costs from Stone.

**COUNT VIII: VIOLATIONS OF THE ARKANSAS CODE ANNOTATED
BY CHARLES J. JOHNSON, JR.**

87. The previous paragraphs are incorporated into this Count as if set forth in full.

88. The act(s) and omission(s) of Johnson and his representative(s), employee(s) and/or agent(s) violated Ark. Code Ann. § 17-24-504(b) and § 17-24-505(b)(2)& (5)&(6) and § 17-24-506(b)(2)&(3)&(4)&(5)&(7)&(8)&(9)&(10)&(11) and § 17-24-508(a).

89. Pursuant to Ark. Code Ann. § 17-24-512, Plaintiffs seek damages, reasonable attorney's fees and costs from Johnson.

**COUNT IX: INVASION OF PRIVACY (INTRUSION ON SECLUSION)
BY NATIONAL ACTION RESOLUTIONS GROUP, LLC**

90. In the alternative, without waiving any of the other causes of action herein, without waiving any procedural, contractual, statutory, or common-law right, and incorporating all other allegations herein to the extent they are not inconsistent with the cause of action pled here, Johnson is liable to Plaintiff for colluding with Ceteris and/or NARG to invade Plaintiff's privacy (intrusion on seclusion). Johnson intentionally caused the intrusion upon Plaintiff's solitude, seclusion, or private affairs, and such intrusion would be highly offensive to a reasonable person.

91. Plaintiff suffered actual damages from Johnson as a result of the intrusion on Plaintiff's privacy.

JURY TRIAL DEMAND

92. Plaintiff is entitled to and hereby demand a trial by jury.

DEMAND FOR RELIEF

WHEREFORE, Plaintiffs requests that the Court grant the following:

93. Judgment in favor of Plaintiff and against National Action Resolutions Group, LLC as follows:

- a. Actual damages pursuant to 15 U.S.C. 1692k(a)(1);
- b. Statutory damages in the amount of \$1,000.00 pursuant to 15 U.S.C. § 1692k(a)(2);
- c. Reasonable attorneys fees and costs pursuant to 15 U.S.C. § 1692k(a)(3);
- d. Actual damages pursuant to Ark. Code Ann. § 17-24-512(a)(1);
- e. Statutory damages in the amount of \$1,000.00 pursuant to Ark. Code Ann. § 17-24-512(a)(2)(A);
- f. Reasonable attorneys fees and costs pursuant to Ark. Code Ann. § 17-24-512(a)(3)(A); and
- g. Such other and further relief as the Court deems just and proper.

94. Judgment in favor of Plaintiff and against Ceteris Portfolio Services, LLC as follows:

- a. Actual damages pursuant to 15 U.S.C. 1692k(a)(1);
- b. Statutory damages in the amount of \$1,000.00 pursuant to 15 U.S.C. § 1692k(a)(2);
- c. Reasonable attorneys fees and costs pursuant to 15 U.S.C. § 1692k(a)(3);
- d. Actual damages pursuant to Ark. Code Ann. § 17-24-512(a)(1);
- e. Statutory damages in the amount of \$1,000.00 pursuant to Ark. Code Ann. § 17-24-512(a)(2)(A);

f. Reasonable attorneys fees and costs pursuant to Ark. Code Ann. § 17-24-512(a)(3)(A); and

g. Such other and further relief as the Court deems just and proper.

95. Judgment in favor of Plaintiff and against Charles J. Johnson, Jr., individually as follows:

- a. Actual damages pursuant to 15 U.S.C. 1692k(a)(1);
- b. Statutory damages in the amount of \$1,000.00 pursuant to 15 U.S.C. § 1692k(a)(2);
- c. Reasonable attorneys fees and costs pursuant to 15 U.S.C. § 1692k(a)(3);
- d. Actual damages pursuant to Ark. Code Ann. § 17-24-512(a)(1);
- e. Statutory damages in the amount of \$1,000.00 pursuant to Ark. Code Ann. § 17-24-512(a)(2)(A);
- f. Reasonable attorneys fees and costs pursuant to Ark. Code Ann. § 17-24-512(a)(3)(A); and
- g. Such other and further relief as the Court deems just and proper.

Respectfully submitted,
/s/ Jeffrey D. Wood

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ATTORNEYS FOR PLAINTIFF

JS 44 (Rev. 09/11)

CIVIL COVER SHEET

The JS 44 civil coversheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

3:26-cv-127-DPM

I. (a) PLAINTIFFS

Justin Jones

DEFENDANTS

National Action Resolutions Group, LLC

Ceteris Portfolio Services, LLC

Charles J. Johnson, Jr.

County of Residence of First Listed Defendant out of state

(b) County of Residence of First Listed Plaintiff Craighead County, Ark.

(EXCEPT IN U.S. PLAINTIFF CASES)

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

(c) Attorneys (Firm Name, Address, and Telephone Number)

The Wood Firm, PLLC

11610 Pleasant Ridge Rd., Suite 103-Box 208

Little Rock, AR 72223 (214) 914-8374

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business In This State | ☐ 4 | ☐ 4 |
| Citizen of Another State | ☐ 2 | ☐ 2 | Incorporated and Principal Place of Business In Another State | ☐ 5 | ☐ 5 |
| Citizen or Subject of a Foreign Country | ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excl. Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Personal Injury - Med. Malpractice	PERSONAL INJURY ☐ 365 Personal Injury - Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Mgmt. Relations ☐ 740 Railway Labor Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Empl. Ret. Inc. Security Act IMMIGRATION ☐ 462 Naturalization Application ☐ 463 Habeas Corpus - Alien Detainee (Prisoner Petition) ☐ 465 Other Immigration Actions	☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 840 Trademark SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 USC 7609	☐ 375 False Claims Act ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☒ 480 Consumer Credit ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/Exchange ☐ 890 Other Statutory Actions ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☐ 895 Freedom of Information Act ☐ 896 Arbitration ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision ☐ 950 Constitutionality of State Statutes

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

15 USC 1692, et seq.

Brief description of cause:

unlawful debt collection practices

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) PENDING OR CLOSED:

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

/s/ Jeffrey D. Wood

04/30/2026

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I. (a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

VI. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553
Brief Description: Unauthorized reception of cable service

VII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. Related Cases. This section of the JS 44 is used to reference cases that are related to this filing, if any. If a related case exists, whether pending or closed, insert the docket numbers and the corresponding judge names for such cases. A case is "related" to this filing if the case: (1) involves some or all of the same parties and is based on the same or similar claim; (2) involves the same property, transaction, or event; (3) involves substantially similar issues of law and fact; and/or (4) involves the same estate in a bankruptcy appeal.

Date and Attorney Signature. Date and sign the civil cover sheet.