

AMENDED COMPLAINT

1:26 CV 04572 GHW

Nicholas Chicorikas - plaintiff

A handwritten signature in blue ink, appearing to read "Nicholas Chicorikas", with a long, sweeping horizontal stroke extending to the right.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Nicholas Chicorikas

Write the full name of each plaintiff.

-against-

Russell Thurlow Vought

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

1:26 CV 04572

(Include case number if one has been assigned)

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ **Federal Question**

☐ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

This is an amended complaint. The federal agency led by Russell Vought, Consumer

Financial Bureau, stole personal belongings. They asked that I file an
internal claim and they do acknowledge holding my belongings but I
opt to seek relief through an impartial body, this federal district court.

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing
information for each additional plaintiff.

If the defendant is an individual:

The defendant, Russell Vought, is a citizen of the State of
(Defendant's name)

District of Columbia

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If the defendant is a corporation:

The defendant, Consumer Financial Protection Bureau, is incorporated under the laws of
the State of **District of Columbia**

and has its principal place of business in the State of **District of Columbia**

or is incorporated under the laws of (foreign state)

and has its principal place of business in **District of Columbia**.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Nicholas

Chicorikas

First Name

Middle Initial

Last Name

1 Briarcliff Rd

Street Address

Putnam County, Carmel

New York

10512

County, City

State

Zip Code

646 483 6710

nicholaschicorikas@gmail.com

Telephone Number

Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: Russell Vought

First Name Last Name

Director, Consumer Financial Protection Bureau and Office of Management and Budget

Current Job Title (or other identifying information)

445 12th Street, SW

Current Work Address (or other address where defendant may be served)

Washington DC 20024

County, City State Zip Code

Defendant 2: _____

First Name Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City State Zip Code

Defendant 3: _____

First Name Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIMPlace(s) of occurrence: Northeast Regional Office, Consumer Financial Protection BureauDate(s) of occurrence: February 8, 2025 through September 6, 2025**FACTS:**

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

The CFPB locked its employees out of their offices in February 2025 at the order of Director Vought. This included my office at 555 Madison Avenue, 8th Floor, New York, NY 10022. I was a home duty station employee who kept some personal equipment at this office. No one disputes the lockout of the employees. It made the news. I had a massive shredder and a pedestal fan that I was prohibited from bringing home. I wrote to the Chief Operating Officer and Facilities many times and was told that one day would be set aside for personal belongings retrieval. It came after I had left the Bureau and the response was find a friend to get your stuff. I live 70 miles from the office. I was basically told too bad. I wrote to Russell Vought twice and to his Deputy twice, and was told to file a claim with the Bureau's tort claim office. I opted for small claims court but claims against the CFPB must go through federal district court. I request a jury trial.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Inability to retrieve my personal belongings and a continuing unwillingness of the CFPB to ship my possessions to me.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

The value of an equivalent industrial shredder \$1,600

Replacement cost of pedestal fan \$110

Cost of this court's filing fees \$405

Cost of money order and other postage for this trial \$30

Cost of three days' absence from work (conference on or about August 28, 2026) and trial

date TBD \$1,575

Cost of travel to all meetings (MetroNorth, parking, subway) \$87

Cost of process server to find and serve Vought \$600

Total \$4,407

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

Amended July 8, 2026

Dated			
Nicholas		Plaintiff's Signature	
		Chicorikas	
First Name	Middle Initial	Last Name	
1 Briarcliff Rd			
Street Address			
Putnam, Carmel		NY	10512 6430
County, City		State	Zip Code
646 483 6710		nicholaschicorikas@gmail.com	
Telephone Number		Email Address (if available)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.



**United States District Court
Southern District of New York**

Pro Se (Nonprisoner) Consent to Receive Documents Electronically

Parties who are not represented by an attorney and are not currently incarcerated may choose to receive documents in their cases electronically (by e-mail) instead of by regular mail. Receiving documents by regular mail is still an option, but if you would rather receive them only electronically, you must do the following:

1. Sign up for a PACER login and password by contacting PACER¹ at www.pacer.uscourts.gov or 1-800-676-6856;
2. Complete and sign this form.

If you consent to receive documents electronically, you will receive a Notice of Electronic Filing by e-mail each time a document is filed in your case. After receiving the notice, you are permitted one "free look" at the document by clicking on the hyperlinked document number in the e-mail.² Once you click the hyperlink and access the document, you may not be able to access the document for free again. After 15 days, the hyperlink will no longer provide free access. Any time that the hyperlink is accessed after the first "free look" or the 15 days, you will be asked for a PACER login and may be charged to view the document. For this reason, *you should print or save the document during the "free look" to avoid future charges.*

IMPORTANT NOTICE

Under Rule 5 of the Federal Rules of Civil Procedure, Local Civil Rule 5.2, and the Court's Electronic Case Filing Rules & Instructions, documents may be served by electronic means. If you register for electronic service:

1. You will no longer receive documents in the mail;
2. If you do not view and download your documents during your "free look" and within 15 days of when the court sends the e-mail notice, you will be charged for looking at the documents;
3. This service does *not* allow you to electronically file your documents;
4. It will be your duty to regularly review the docket sheet of the case.³

¹ Public Access to Court Electronic Records (PACER) (www.pacer.uscourts.gov) is an electronic public access service that allows users to obtain case and docket information from federal appellate, district, and bankruptcy courts, and the PACER Case Locator over the internet.

² You must review the Court's actual order, decree, or judgment and not rely on the description in the email notice alone. See ECF Rule 4.3

³ The docket sheet is the official record of all filings in a case. You can view the docket sheet, including images of electronically filed documents, using PACER or you can use one of the public access computers available in the Clerk's Office at the Court.

500 PEARL STREET | NEW YORK, NY 10007
300 QUARROPAS STREET | WHITE PLAINS, NY 10601

PRO SE INTAKE UNIT: 212-805-0175

CONSENT TO ELECTRONIC SERVICE

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

Civil case(s) filed in the Southern District of New York:

Note: This consent will apply to all cases that you have filed in this court, so please list all of your pending and terminated cases. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

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Chicorikas, Nicholas

Name (Last, First, MI)

1 Briarcliff Rd

Carmel

New York

10512

Address

City

State

Zip Code

646 483 6710

nicholaschicorikas@gmail.com

Telephone Number

E-mail Address

646 483 6710



Date

Signature

Return completed form to:

Pro Se Intake Unit (Room 200)
500 Pearl Street
New York, NY 10007