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Crissandra Gordon)	United States District Court
)	Northern District of Illinois
Plaintiff)	
)	
V.)	Case No.:
)	
Syndicated Office Systems, LLC)	
d/b/a Central Financial Control)	
)	
Defendant)	

COMPLAINT

Plaintiff Crissandra Gordon ("Plaintiff" or "Gordon"), by and through her attorneys, RC Law Group, PLLC, as and for its Complaint against Defendant Syndicated Office Systems, LLC d/b/a Central Financial Control ("Defendant" or "Central Financial Control"), respectfully sets forth, complains and alleges, upon information and belief, the following:

INTRODUCTION/PRELIMINARY STATEMENT

1. Plaintiff brings this action for damages and declaratory and injunctive relief arising from the Defendant's violation(s) of section 1692 et. seq. of Title 15 of the United States Code, commonly referred to as the Fair Debt Collections Practices Act ("FDCPA").

PARTIES

Plaintiff is a resident of the State of Illinois, County of Cook, residing at 321
 South Maple Avenue, Oak Park, IL 60302.

Defendant is a debt collector with an address at 3560 Dallas Parkway, Frisco, TX,
 75034.

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Central Financial Control is a "debt collector" as the phrase is defined in <u>15</u>
 <u>U.S.C. § 1692(a)(6)</u> and used in the FDCPA.

JURISDICTION AND VENUE

5. The Court has jurisdiction over this matter pursuant to <u>28 U.S.C. § 1331</u>, as well as <u>15 U.S.C. § 1692</u> et. seq. and <u>28 U.S.C. § 2201</u>. If applicable, the Court also has pendant jurisdiction over the State law claims in this action pursuant to <u>28 U.S.C. § 1367(a)</u>.

6. Venue is proper in this judicial district pursuant to <u>28 U.S.C. § 1391(b)(2)</u>.

FACTUAL ALLEGATIONS

7. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully state herein with the same force and effect as if the same were set forth at length herein.

8. On information and belief, on a date better known to Defendant, Defendant began collection activities on an alleged consumer debt (the "Alleged Debt") from the Plaintiff.

9. This debt was incurred as a financial obligation that was primarily for personal, family or household purposes and is therefore a "debt" as that term is defined by 15 U.S.C. § 1692a(5).

10. The reporting of a debt to a credit reporting agency by a debt collector is a communication covered by the FDCPA.

11. Defendant reported the Alleged Debt on the Plaintiff's credit report.

12. Plaintiff disputed the Alleged Debt directly with the Defendant with a dispute letter on July 27, 2015.

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13. Plaintiff examined her credit report again on October 2, 2015 and found that Defendant had not removed the credit account nor marked it as "disputed by consumer" despite being required to do so by the FDCPA.

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

FIRST CAUSE OF ACTION (Violations of the FDCPA)

15. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully state herein with the same force and effect as if the same were set forth at length herein.

Defendant's debt collection efforts attempted and/or directed towards Plaintiff
 violate various provisions of the FDCPA, including but not limited to 15 U.S.C. §§ 1692d,
 1692e(2), 1692e(5), 1692e(8), and 1692f.

17. As a result of the Defendant's violations of the FDCPA, Plaintiff has been damaged and is entitled to damages in accordance with the FDCPA.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiff Crissandra Gordon demands judgment from the Defendant Syndicated

Office Systems, LLC d/b/a Central Financial Control, as follows:

- a) For actual damages provided and pursuant to 15 U.S.C. § 1692k(a)1);
- b) For statutory damages provided and pursuant to 15 U.S.C. § 1692k(a)(2)(A);
- c) For attorney fees and costs provided and pursuant to 15 U.S.C. § 1692k(a)(3);
- d) A declaration that the Defendants practices violated the FDCPA; and
- e) For any such other and further relief, as well as further costs, expenses and disbursements of this action as this Court may deem just and proper.

Dated: Hackensack, New Jersey April 19, 2016

/s/ Yaakov Saks

RC Law Group, PLLC By: Yaakov Saks, Esq. 285 Passaic Street Hackensack, NJ 07601 Phone: 201.282.6500 Ext. 201 Fax: 201.282.6501

JS 44 (Rev. 12/12) Case: 1:16-cv-04440 Document #:116-cv-04440 Document #:116-cv-0440 Document #:116-cv-04440 Document #:116-c

The JS 44 civil cover sheet 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.)*

I. (a) PLAINTIFFS Crissandra Gordon			S	DEFENDANTS yndicated Office /b/a Central Fina	Systems, LLC	
(b) County of Residence of First Listed Plaintiff Cook (EXCEPT IN U.S. PLAINTIFF CASES)		County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.				
(c) Attorneys (Firm Name, A RC Law Group, PLLC 285 Passaic Street Hackensack, NJ 07601	Address, and Telephone Numbe Tel. (201) 2			Attorneys (If Known)	
II. BASIS OF JURISDI	CTION (Place an "X" in O	ne Box Only)	III. CITI	ZENSHIP OF I	PRINCIPAL PARTIES	(Place an "X" in One Box for Plaintiff
□ 1 U.S. Government Plaintiff	3 Federal Question (U.S. Government)	Not a Party)			PTF DEF 1	
2 U.S. Government Defendant	☐ 4 Diversity (Indicate Citizensh)	ip of Parties in Item III)				Another State
				Subject of a f	□ 3 □ 3 Foreign Nation	
IV. NATURE OF SUIT			FODE		DANIZDUDTCV	OTHED STATUTES
CONTRACT 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 (Excludes Veterans) 153 Recovery of Overpayment of Veteran's Benefits 160 Stockholders' Suits 190 Other Contract 195 Contract Product Liability 196 Franchise REAL PROPERTY 210 Land Condemnation 220 Foreclosure 230 Rent Lease & Ejectment 240 Torts to Land 245 Tort Product Liability 290 All Other Real Property	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel &	RTS PERSONAL INJURY 365 Personal Injury - Product Liability Pharmaceutical Personal Injury Product Liability Base Score 370 Other Fraud 371 Truth in Lending 380 Other Personal Property Damage 385 Property Damage Product Liability PRISONER PETITION Habeas Corpus: 463 Alien Detainee 530 General 535 Death Penalty Other: 540 Mandamus & Othe 555 Prison Condition 560 Civil Rights 555 Prison Condition 560 Civil Rights	Y □ 625 D 0 0 0 0 690 O 0 0 710 Fa A 1 720 Li R 1 720 Li R 1 740 R 1 1 790 D 1 1 790 Fi 1 1 790 Fi 1 1 791 Fi In 1 791 Fi In 1 1791 Fi 1 1 191 Fi 1 1 101 Fi 1 1 1462 N 1 er □ 465 O	EITURE/PENALTY rug Related Seizure f Property 21 USC 881 ther LABOR tir Labor Standards ct abor/Management elations ailway Labor Act mily and Medical eave Act ther Labor Litigation mployee Retirement come Security Act MMIGRATION aturalization Applicatio ther Immigration ctions	BANKRUPTCY 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	OTHER STATUTES 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 899 Administrative Procedure Act/Review or Appeal of Agency Decision 950 Constitutionality of State Statutes
V. ORIGIN (Place an "X" in		•	•		•	
		Remanded from Appellate Court	4 Reinstat Reopend		ner District Litigation	
VI. CAUSE OF ACTIO	DN 15 U.S.C. 1692 e Brief description of ca Failure to property	^{iuse:} y report a debt as d	isputed		atutes unless diversity):	
VII. REQUESTED IN COMPLAINT:	UNDER RULE 2	IS A CLASS ACTION 3, F.R.Cv.P.	J DEM	AND \$	CHECK YES only JURY DEMAND	y if demanded in complaint: D: □ Yes 🗶 No
VIII. RELATED CASI IF ANY	E(S) (See instructions):	JUDGE			DOCKET NUMBER	
DATE 04/19/2016 FOR OFFICE USE ONLY		SIGNATURE OF ATT		ECORD		
	10UNT	APPLYING IFP		JUDGE	MAG. JU	JDGE