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17 **Attorneys for Plaintiff**
18 ***Pro Hac Vice Motion To Be Filed***

19 **IN THE UNITED STATES DISTRICT COURT**
20 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
21 **OAKLAND DIVISION**

22 **VENUS JONES**, individually and on
23 behalf of all others similarly situated,

24 Plaintiff

25 -against-

26 **JEFFERSON CAPITAL SYSTEMS,**
27 **LLC,**

28 Defendant

Civil Case No.:

CIVIL ACTION

CLASS ACTION COMPLAINT
and
JURY TRIAL DEMAND

1 Plaintiff VENUS JONES (hereinafter, “Plaintiff”), a California resident,
2 brings this class action complaint by and through the undersigned attorneys,
3 against Defendant JEFFERSON CAPITAL SYSTEMS, LLC (hereinafter
4 “Defendant”), for its violations of the Fair Debt Collection Practices Act 15
5 U.S.C. §1692 (hereinafter “FDCPA”), and the Rosenthal Fair Debt Collection
6 Practices Act, California Civil Code §§ 1788 et seq. (hereinafter “RFDCPA”),
7 individually and on behalf of a class of all others similarly situated, pursuant to
8 Rule 23 of the Federal Rules of Civil Procedure, based upon information and
9 belief of Plaintiff’s counsel, except for allegations specifically pertaining to
10 Plaintiff, which are based upon Plaintiff’s personal knowledge.
11

12 **INTRODUCTION/PRELIMINARY STATEMENT**

- 13
- 14
- 15 1. Congress enacted the FDCPA in 1977 in response to the “abundant evidence
16 of the use of abusive, deceptive, and unfair debt collection practices by many
17 debt collectors.” 15 U.S.C. § 1692(a). At that time, Congress was concerned
18 that “abusive debt collection practices contribute to the number of personal
19 bankruptcies, to material instability, to the loss of jobs, and to invasions of
20 individual privacy.” *Id.* Congress concluded that “existing laws . . . [we]re
21 inadequate to protect consumers,” and that “the effective collection of debts”
22 does not require “misrepresentation or other abusive debt collection
23 practices.” 15 U.S.C. §§ 1692(b) & (c).
24
- 25 2. Congress explained that the purpose of the Act was not only to eliminate
26 abusive debt collection practices, but also to “insure that those debt collectors
27 who refrain from using abusive debt collection practices are not competitively
28 disadvantaged.” *Id.* § 1692(e). After determining that the existing consumer

1 protection laws were inadequate, *id.* § 1692(b), Congress gave consumers a
2 private cause of action against debt collectors who fail to comply with the Act.
3 *Id.* § 1692k.

- 4
5 3. One of the purposes of the Rosenthal Fair Debt Collection Practices Act,
6 California Civil Code § 1788 is to similarly prohibit debt collectors from
7 engaging in unfair or deceptive acts or practices in the collection of consumer
8 debts.

9
10 **JURISDICTION AND VENUE**

- 11
12
13 4. The Court has jurisdiction over this class action under 28 U.S.C. § 1331, 15
14 U.S.C. § 1692 *et seq.* and 28 U.S.C. § 2201. If applicable, the Court also has
15 pendent jurisdiction over the state law claims in this action pursuant to 28
16 U.S.C. § 1367(a).
17 5. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(2).

18
19 **NATURE OF THE ACTION**

- 20
21 6. Plaintiff brings this class action on behalf of a class of California consumers
22 seeking redress for Defendant's actions of using false, deceptive and
23 misleading representation or means in connection with the collection of an
24 alleged debt.
25 7. Defendant's actions violated § 1692 *et seq.* of Title 15 of the United States
26 Code, commonly referred to as the Fair Debt Collections Practices Act
27 ("FDCPA"), which prohibits debt collectors from engaging in false,
28 deceptive or misleading practices.

- 1 8. Defendant’s actions violated California Civil Code § 1788 et seq. of the
2 Rosenthal Fair Debt Collection Practices Act (“RFDCPA”), which similarly
3 prohibits debt collectors from engaging in unfair or deceptive acts or
4 practices in the collection of consumer debts.
5 9. Plaintiff is seeking damages, and declaratory and injunctive relief.
6

7 **PARTIES**
8

- 9 10. Plaintiff is a natural person and a resident of Alameda County in the State of
10 California, and is a “Consumer” as defined by 15 U.S.C. §1692(a)(3).
11 11. Defendant Jefferson Capital Systems, LLC is a collection agency with its
12 registered office located at 2345 Rice Street, Suite 230, Roseville, Minnesota
13 55113.
14 12. Upon information and belief, Defendant is a company that uses the mail,
15 telephone, or facsimile in a business the principal purpose of which is the
16 collection of debts, or that regularly collects or attempts to collect debts alleged
17 to be due another.
18 13. Defendant is a “debt collector,” as defined under the FDCPA under 15 U.S.C.
19 § 1692a(6).
20

21 **ALLEGATIONS OF FACT**
22

- 23 14. Plaintiff repeats, reiterates and incorporates the allegations contained in
24 paragraphs above herein with the same force and effect as if the same were set
25 forth at length herein.
26 15. Some time prior to May 13, 2017, an obligation was allegedly incurred to
27 VERIZON WIRELESS.
28 16. The VERIZON WIRELESS obligation arose out of a transaction in which

1 money, property, insurance or services, which are the subject of the transaction,
2 are primarily for personal, family or household purposes.

3 17.The alleged VERIZON WIRELESS obligation is a "debt" as defined by 15
4 U.S.C.§ 1692a(5).

5 18.VERIZON WIRELESS is a "creditor" as defined by 15 U.S.C.§ 1692a(4).

6 19.Defendant contends that the VERIZON WIRELESS debt is past due.

7 20.Defendant is a company that uses mail, telephone or facsimile in a business
8 the principal purpose of which is the collection of debts, or that regularly
9 collects or attempts to collect debts incurred or alleged to have been incurred
10 for personal, family or household purposes on behalf of creditors.

11 21.VERIZON WIRELESS directly or through an intermediary contracted the
12 Defendant to collect the alleged debt.

13 22.On or about May 13, 2017, the Defendant caused to be delivered to the
14 Plaintiff a collection letter in an attempt to collect the alleged VERIZON
15 WIRELESS debt. *See Exhibit A.*

16 23.The May 13, 2017 letter was sent or caused to be sent by persons employed
17 by Defendant as a “debt collector” as defined by 15 U.S.C. §1692a(6).

18 24.The May 13, 2017 letter is a “communication” as defined by 15 U.S.C.
19 §1692a(2).

20 25.The Plaintiff received and read the Letter sometime after May 13, 2017.

21 26.The Letter stated in part:

22 “If you do not pay the debt, we may report or continue to report it to the
23 credit reporting agencies as unpaid for as long as the law permits this
24 reporting.”
25

26 27.The Letter further stated:

27 “In addition, we have requested that the consumer reporting agencies delete
28 the account from your credit file.”

1 28. The Plaintiff, as would any least sophisticated consumer, was left unsure as to
2 whether the alleged debt would continue to be reported on her credit file or
3 not.

4 29. Pursuant to 15 U.S.C. § 1692e of the FDCPA, a debt collector may not use
5 any false representation or deceptive means to collect or attempt to collect a
6 debt is.

7 30. As a result of the Defendant's violations of the FDCPA, the Plaintiff was
8 harmed.

9 31. Defendant's actions as described herein are part of a pattern and practice used
10 to collect consumer debts.

11 32. Defendant could have taken the steps necessary to bring its actions within
12 compliance with the FDCPA, but neglected to do so and failed to
13 adequately review its actions to ensure compliance with the law.
14

15
16 **CLASS ALLEGATIONS**
17

18 33. Plaintiff brings claims, pursuant to the Federal Rules of Civil Procedure
19 (hereinafter "FRCP") Rule 23, individually and on behalf of the following
20 consumer class (the "Class") consisting of: a) All consumers who have
21 an address in Alameda County in the state of California b) who were sent
22 a collection letter from the Defendant c) attempting to collect a consumer
23 debt owed to or allegedly owed to Verizon d) which contained conflicting
24 language regarding credit reporting (e) which letter was sent on or after a
25 date one year prior to the filing of this action and on or before a date 21
26 days after the filing of this action.

27 34. The identities of all class members are readily ascertainable from the
28 records of Defendants and those companies and entities on whose behalf

1 they attempt to collect and/or have purchased debts.

2 35. Excluded from the Plaintiff Classes are the Defendants and all officers,
3 members, partners, managers, directors, and employees of the Defendants
4 and their respective immediate families, and legal counsel for all parties to
5 this action and all members of their immediate families.

6 36. There are questions of law and fact common to the Plaintiff Classes,
7 which common issues predominate over any issues involving only
8 individual class members. The principal issue is whether the Defendants'
9 written communications to consumers, in the forms attached as Exhibit A,
10 violate 15 U.S.C. § 1692e.

11 37. The Plaintiffs' claims are typical of the class members, as all are based
12 upon the same facts and legal theories.

13 38. The Plaintiffs will fairly and adequately protect the interests of the
14 Plaintiff Classes defined in this complaint. The Plaintiffs have retained
15 counsel with experience in handling consumer lawsuits, complex legal
16 issues, and class actions, and neither the Plaintiffs nor their attorneys have
17 any interests, which might cause them not to vigorously pursue this action.
18

19 39. This action has been brought, and may properly be maintained, as a class
20 action pursuant to the provisions of Rule 23 of the Federal Rules of Civil
21 Procedure because there is a well-defined community interest in the
22 litigation:

23 a. Numerosity: The Plaintiffs are informed and believe, and on that
24 basis allege, that the Plaintiff Classes defined above are so
25 numerous that joinder of all members would be impractical.

26 b. Common Questions Predominate: Common questions of law and
27 fact exist as to all members of the Plaintiff Classes and those
28 questions predominate over any questions or issues involving only

1 individual class members. The principal issue is whether the
2 Defendants' written communications to consumers, in the forms
3 attached as Exhibit A, violate 15 U.S.C. § 1692e.

4 c. Typicality: The Plaintiffs' claims are typical of the claims of the
5 class members. The Plaintiffs and all members of the Plaintiff
6 Classes have claims arising out of the Defendants' common
7 uniform course of conduct complained of herein.

8 d. Adequacy: The Plaintiffs will fairly and adequately protect the
9 interests of the class members insofar as Plaintiffs have no interests
10 that are averse to the absent class members. The Plaintiffs are
11 committed to vigorously litigating this matter. Plaintiffs have also
12 retained counsel experienced in handling consumer lawsuits,
13 complex legal issues, and class actions. Neither the Plaintiffs nor
14 their counsel have any interests which might cause them not to
15 vigorously pursue the instant class action lawsuit.

16 e. Superiority: A class action is superior to the other available means
17 for the fair and efficient adjudication of this controversy because
18 individual joinder of all members would be impracticable. Class
19 action treatment will permit a large number of similarly situated
20 persons to prosecute their common claims in a single forum
21 efficiently and without unnecessary duplication of effort and
22 expense that individual actions would engender.

23
24 40. Certification of a class under Rule 23(b)(3) of the Federal Rules of Civil
25 Procedure is also appropriate in that the questions of law and fact common
26 to members of the Plaintiff Classes predominate over any questions
27 affecting an individual member, and a class action is superior to other
28 available methods for the fair and efficient adjudication of the controversy.

1 41. Depending on the outcome of further investigation and discovery,
2 Plaintiffs may, at the time of class certification motion, seek to certify a
3 class(es) only as to particular issues pursuant to Fed. R. Civ. P. 23(c)(4).
4

5 **FIRST CAUSE OF ACTION**

6 **VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT**

7 **15 U.S.C. §1692e et seq.**

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

11 43. Defendants' debt collection efforts attempted and/or directed towards the
12 Plaintiff violated various provisions of the FDCPA, including but not
13 limited to 15 U.S.C. § 1692e.
14

15 44. Pursuant to 15 U.S.C. § 1692e, a debt collector may not use any false,
16 misleading and/or deceptive means to collect or attempt to collect any
17 debt or to obtain information concerning a consumer.

18 45. The Defendants violated said section in its letter to the Plaintiff by:

- 19 a. Using a false, deceptive, and misleading representations or
20 means in connection with the collection of a debt;
21 b. Making a false representation or using deceptive means to collect
22 a debt in violation of 1692e(10).

23 46. By reason thereof, Defendant is liable to Plaintiff for judgment that
24 Defendant's conduct violated Section 1692e et seq. of the FDCPA, actual
25 damages, statutory damages, costs and attorneys' fees.
26

27 **SECOND CAUSE OF ACTION**

28 **(Violations Of The Rosenthal Fair Debt Collection Practices Act)**

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

4 48.Cal. Civ. Code §1788.17 mandates that every person or entity collecting or
5 attempting to collect a consumer debt shall comply with the provisions of
6 Sections 1692b to 1692j, inclusive, of, and shall be subject to the remedies
7 in Section 1692k of, Title 15 of the United States Code statutory
8 regulations contained within the FDCPA, 15 U.S.C. § 1692 et seq.

9 49.As set forth above, Defendant violated 15 U.S.C. § 1692e(10) by making a
10 false representation and using deceptive and misleading means to collect a
11 debt.

12 50.As set forth above, Defendant violated 15 U.S.C. § 1692g(a)(2) by failing
13 to clearly and concisely convey the name of the creditor to whom the
14 alleged debt is owed.

15 51.As such, Defendant violated the foregoing provisions of the FDCPA and
16 RFDCPA.

17 52.As a direct and proximate result of Defendant's violations of the RFDCPA
18 and FDCPA, Plaintiff was harmed, and may recover from Defendant one
19 thousand dollars (\$1,000.00) in statutory damages in addition to actual
20 damages and reasonable attorneys' fees and costs pursuant to Cal. Civ.
21 Code § 1788.30.
22

23
24 **DEMAND FOR TRIAL BY JURY**

25 53.Pursuant to Rule 38 of the Federal Rules of Civil Procedure,
26 Plaintiff hereby request a trial by jury on all issues so triable.
27
28

1 **PRAYER FOR RELIEF**

2
3 **WHEREFORE**, Plaintiff demands judgment against Defendants as follows:

4 (a) Declaring that this action is properly maintainable as a Class
5 Action and certifying Plaintiff as Class representative and the undersigned as
6 Class Counsel;

7 (b) Awarding Plaintiff and the Class statutory damages;

8 (c) Awarding Plaintiff and the Class actual damages;

9 (d) Awarding Plaintiff costs of this Action, including reasonable
10 attorneys' fees and expenses;

11 (e) Awarding pre-judgment interest and post-judgment interest;

12 and

13 (f) Awarding Plaintiff and the Class such other and further relief
14 as this Court may deem just and proper.
15

16
17 Dated: January 22, 2018

18 /s/ Jonathan A. Stieglitz
19 JONATHAN A. STIEGLITZ
20 (SBN 278028)
21 jonathan.a.stieglitz@gmail.com
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28 **PRO HAC VICE MOTION TO BE FILED**

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Attorneys for the Plaintiff

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Rec'd 05-22-17
05-25-17
SCANNED

JEFFERSON

CAPITAL SYSTEMS, LLC

16 McLeland Road
Saint Cloud, MN 56303
1-800-281-2793 English and Español
Mon-Fri 8 AM - 3 PM Central Time



Debt Description:	VERIZON WIRELESS
Account #:	XXXXXXXXXX0001
Current Creditor:	JEFFERSON CAPITAL SYSTEMS LLC
TCS Reference:	
Amount of the Debt:	\$771.93

May 13, 2017

Dear Venus Jones I,

The law limits how long you can be sued on a debt. Because of the age of your debt, we (Jefferson Capital Systems) will not sue you for it. If you do not pay the debt, we may report or continue to report it to the credit reporting agencies as unpaid for as long as the law permits this reporting.

We acknowledge receipt of your communication concerning the above referenced account.

Based on your stated dispute we have ceased collection of this account. In addition, we have requested that the consumer reporting agencies delete the account from your credit file.

Should you have any questions regarding this matter please feel free to contact us at the number listed above. Please note our new payment address

Sincerely,

Jefferson Capital Systems, LLC
Jefferson Capital Systems, LLC

Notice of Important Information: Consumers have rights including, but not limited to those rights listed below:

Complaints: If you have a complaint, please write to us at 16 McLeland Road Dept. C Saint Cloud, MN 56303 or call us toll-free at 1-888-718-0048, Monday through Friday.

THE CALIFORNIA STATE ROSENTHAL FAIR DEBT COLLECTION PRACTICES ACT AND THE FEDERAL FAIR DEBT COLLECTION PRACTICES ACT REQUIRE THAT, EXCEPT UNDER UNUSUAL CIRCUMSTANCES, COLLECTORS MAY NOT CONTACT YOU BEFORE 8:00 A.M. OR AFTER 9:00 P.M. THEY MAY NOT HARASS YOU BY USING THREATS OF VIOLENCE OR ARREST OR BY USING OBSCENE LANGUAGE. COLLECTORS MAY NOT USE FALSE OR MISLEADING STATEMENTS OR CALL YOU AT WORK IF THEY KNOW OR HAVE REASON TO KNOW THAT YOU MAY NOT RECEIVE PERSONAL CALLS AT WORK. FOR THE MOST PART, COLLECTORS MAY NOT TELL ANOTHER PERSON, OTHER THAN YOUR ATTORNEY OR SPOUSE ABOUT YOUR DEBT. COLLECTORS MAY CONTACT ANOTHER PERSON TO CONFIRM YOUR LOCATION OR ENFORCE A JUDGMENT. FOR MORE INFORMATION ABOUT DEBT COLLECTION ACTIVITIES, YOU MAY CONTACT THE FEDERAL TRADE COMMISSION AT 1-877-FTC-HELP OR www.ftc.gov.

Jonathan A. Stieglitz, Esq.
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Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

VENUS JONES, individually and on
behalf of all others similarly situated,

Plaintiff,

-against-

JEFFERSON CAPITAL SYSTEMS, LLC

Defendant.

Civil Case No.:

**PLAINTIFF VENUS JONES'S LOCAL RULE 3-16 CERTIFICATION OF
INTERESTED ENTITIES OR PERSONS**

Pursuant to Civil L.R. 3-16, the undersigned certifies that of this date, other than the named parties, there is no such interest to report.

Dated: February 12, 2018

/s/ Jonathan A. Stieglitz
Jonathan A. Stieglitz, Esq.
(SBN 278028)
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CIVIL COVER SHEET

The JS-CAND 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 in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

VENUS JONES, individually and on behalf of all others similarly situated

(b) County of Residence of First Listed Plaintiff Alameda (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Law Offices of Jonathan A Stieglitz 11845 W. Olympic Blvd Ste 800 Los Angeles CA 90064 323.979.2063 jonathan.a.stieglitz@gmail.com

DEFENDANTS

JEFFERSON CAPITAL SYSTEMS, LLC

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.

Attorneys (If Known)

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)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

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

Large table with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, HABEAS CORPUS, OTHER, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER 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-Transfer 8 Multidistrict Litigation-Direct File

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

Brief description of cause: Defendant violated the FDCPA

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, Fed. R. Civ. P. DEMAND \$

CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S), IF ANY (See instructions):

JUDGE DOCKET NUMBER

IX. DIVISIONAL ASSIGNMENT (Civil Local Rule 3-2)

(Place an "X" in One Box Only) SAN FRANCISCO/OAKLAND SAN JOSE EUREKA-MCKINLEYVILLE

DATE 02/12/2018

SIGNATURE OF ATTORNEY OF RECORD

/s/ Jonathan A Stieglitz

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS-CAND 44

Authority For Civil Cover Sheet. The JS-CAND 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 in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate 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 Federal Rule of Civil Procedure 8(a), 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.
- (1) United States plaintiff. Jurisdiction based on 28 USC §§ 1345 and 1348. Suits by agencies and officers of the United States are included here.
 - (2) United States defendant. When the plaintiff is suing the United States, its officers or agencies, place an “X” in this box.
 - (3) Federal question. This refers to suits under 28 USC § 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.
 - (4) Diversity of citizenship. This refers to suits under 28 USC § 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; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS-CAND 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 clerk(s) 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 six boxes.
- (1) Original Proceedings. Cases originating in the United States district courts.
 - (2) Removed from State Court. Proceedings initiated in state courts may be removed to the district courts under Title 28 USC § 1441. When the petition for removal is granted, check this box.
 - (3) Remanded from Appellate Court. Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 - (4) Reinstated or Reopened. Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 - (5) Transferred from Another District. For cases transferred under Title 28 USC § 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 - (6) Multidistrict Litigation Transfer. Check this box when a multidistrict case is transferred into the district under authority of Title 28 USC § 1407. When this box is checked, do not check (5) above.
 - (8) Multidistrict Litigation Direct File. Check this box when a multidistrict litigation case is filed in the same district as the Master MDL docket. Please note that there is no Origin Code 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- 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 Federal Rule of Civil Procedure 23. Demand. In this space enter the actual dollar amount 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-CAND 44 is used to identify related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- IX. Divisional Assignment.** If the Nature of Suit is under Property Rights or Prisoner Petitions or the matter is a Securities Class Action, leave this section blank. For all other cases, identify the divisional venue according to Civil Local Rule 3-2: “the county in which a substantial part of the events or omissions which give rise to the claim occurred or in which a substantial part of the property that is the subject of the action is situated.”
- Date and Attorney Signature.** Date and sign the civil cover sheet.

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Jefferson Capital Systems Named in Debt Collection Class Action in California](#)
