

**CARLSON LYNCH SWEET
KILPELA & CARPENTER, LLP**

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

TINA POWERS, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A. and
DOES 1 through 50, inclusive,

Defendant.

Case No.: '17CV1462 AJB WVG

CLASS ACTION COMPLAINT

**1. VIOLATION OF THE FAIR
CREDIT REPORTING ACT,
15 U.S.C. § 1681b**

DEMAND FOR JURY TRIAL

1 Plaintiff TINA POWERS (“Plaintiff”) brings this action on behalf of herself and all
2 others similarly situated against Defendant JPMORGAN CHASE BANK, N.A.
3 (“Defendant”) and states:

4 **I. INTRODUCTION**

5 1. Arbitrary disclosure of a consumer’s financial information engenders a grave
6 threat to privacy. Congress enacted the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et al.*
7 (the “FCRA”) to curb the abuses of consumer reporting agencies and to ensure that entities
8 that obtain credit reports exercise their duties with fairness and sensitivity to a consumer’s
9 privacy. In recognizing the risk of misuse of information and the unnecessary harm to a
10 consumer’s credit score, Congress strictly limits the instances in which a person or entity
11 may access a consumer’s credit report. Defendant blatantly defies this law by knowingly
12 obtaining its customers’ credit reports without a permissible purpose, resulting in an
13 unreasonable and careless invasion of consumer privacy.

14 2. Defendant willfully violated the FCRA when it accessed the contents of
15 Plaintiff’s credit file. Defendant certified to Equifax that it had a legitimate business need
16 or other permissible purpose for obtaining Plaintiff’s consumer credit report despite
17 knowing it no longer maintained any debtor-creditor relationship with Plaintiff.
18 Accordingly, Defendant’s actions constitute a willful violation of Section 1681b.

19 3. Plaintiff seeks to bring this action on behalf of herself and a Class of other
20 similarly situated consumers who were subjected to Defendant’s illegal conduct and seeks
21 to recover actual, statutory, and punitive damages for each Class member due to
22 Defendant’s intentional violations.

23 **II. JURISDICTION AND VENUE**

24 4. This Court has original jurisdiction over the action pursuant to 15 U.S.C. §
25 1681p, without regard to the amount in controversy, because the action arises out of
26 Defendant’s willful violations of the FCRA.

27 5. This Court has personal jurisdiction over Defendant because Defendant is
28 authorized to conduct and does conduct business in California. Defendant maintains over

1 1,000 locations in California and thus, has sufficient minimum contacts with California
2 and sufficiently avails itself of the California market.

3 6. Venue is appropriate in this District pursuant to 28 U.S.C. § 1391(a) and (b)
4 because a substantial part of the events or omissions giving rise to Plaintiff's claims
5 occurred while she resided in this judicial district. Venue is also proper under 28 U.S.C. §
6 1965(a) because Defendant transacts substantial business in this District.

7 **III. PARTIES**

8 **Plaintiff**

9 7. Plaintiff Tina Powers ("Plaintiff") is an individual currently residing in Clark
10 County, Nevada. Plaintiff is a "consumer" as defined by 15 U.S.C. § 1681a(c).

11 **Defendant**

12 8. Defendant JPMorgan Chase Bank, N.A, a subsidiary of JPMorgan Chase &
13 Co., is a national banking association incorporated in New York with its principal place of
14 business in Newark, Delaware. Defendant operates branches in 23 states in the United
15 States. Defendant is a "person" as defined by 15 U.S.C. § 1681a(b) because it is a national
16 association.

17 **IV. FACTUAL ALLEGATIONS**

18 9. On or about December 20, 2005 Plaintiff obtained a mortgage from Defendant
19 secured by real property located at 4872 and 4874 Coconino Way, San Diego, California
20 92117 (the "Property"). The Parties effectively entered into a debtor-creditor relationship
21 with respect to the mortgage on the Property.

22 10. On or before January 28, 2016, Plaintiff successfully paid off the mortgage.
23 Defendant mailed Plaintiff a letter dated January 28, 2016 confirming that Plaintiff paid
24 off the mortgage for Account No. 0917681146.

25 11. At that time, Plaintiff maintained no other existing accounts with Defendant,
26 nor did she maintain any revolving lines of credit with Defendant. Accordingly, the debtor-
27 creditor relationship between the Parties had concluded.

28

1 12. Notwithstanding the conclusion of a relationship between the Parties,
2 Defendant accessed Plaintiff’s Equifax credit file on February 9, 2016.

3 13. Equifax Inc. (“Equifax”) is a consumer credit reporting agency incorporated
4 under the laws of the State of Georgia with its principal place of business in Atlanta,
5 Georgia. Equifax is a “consumer reporting agency” as defined in 15 U.S.C. § 1681a(f)
6 because it an entity which “regularly engages in . . . the practice of assembling or evaluating
7 consumer credit information or other information on consumers for the purpose of
8 furnishing consumer report to third parties . . .” Equifax regularly provides consumer
9 credit reporting services to Defendant, who subscribes to Equifax’s services.

10 14. Defendant is a “furnisher of information” as described in 15 U.S.C. § 1681s-
11 2 because it regularly furnishes information to Equifax and other consumer reporting
12 agencies about its customers.

13 15. On February 9, 2016, Defendant willfully obtained Plaintiff’s credit file from
14 Equifax. In doing so, Defendant furnished Plaintiff’s information to Equifax and generally
15 or specifically certified that it maintained a permissible purpose for accessing Plaintiff’s
16 credit consumer report in that instance.

17 16. In correspondence dated March 21, 2016, Defendant confirmed that its access
18 to Plaintiff’s credit file was improper and indicated it would take steps to have the improper
19 February 9, 2016 credit inquiry removed.

20 **V. CLASS ALLEGATIONS**

21 17. Plaintiff brings this action on behalf of herself and all other similarly situated
22 Class members pursuant to Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure
23 and seeks certification of the following Class against Defendant:

24 All consumers in the United States, from October 17, 2014 through the date
25 of trial, whose credit consumer report was obtained by Defendant at a time
26 when the consumer no longer had an existing account or credit relationship,
27 as defined in 15 U.S.C. § 1681b(a)(3)(A)-(F), with Defendant.
28

1 18. Excluded from the Class is Defendant, their officers, directors, and
2 employees.

3 19. **Numerosity.** The members of the Class are so numerous that joinder of all
4 members of the Class is impracticable. Plaintiff is informed and believes that the proposed
5 Class contains hundreds of thousands of customers in the United States who have been
6 damaged by Defendant's impermissible access of their credit consumer reports. The
7 precise number of Class members is unknown to Plaintiff.

8 20. **Existence and Predominance of Common Questions of Law and Fact.** This
9 action involves common questions of law and fact, which predominate over any questions
10 affecting individual Class members. These common legal and factual questions include,
11 but are not limited to, the following:

- 12 a) Whether Defendant willfully obtained Plaintiff's and Class members'
13 credit consumer reports for an impermissible purpose;
- 14 b) Whether Defendant's alleged conduct constitutes a violation of the FCRA;
15 and
- 16 c) Whether Plaintiff and Class members have been harmed by Defendant's
17 willful noncompliance with the FCRA and the proper measure of such
18 harm.

19 21. **Typicality.** Plaintiff's claims are typical of the claims of the Class members
20 because, *inter alia*, all Class members were injured by the uniform misconduct described
21 above and each claim arises from the same factual basis and unlawful violation.

22 22. **Adequacy of Representation.** Plaintiff will fairly and adequately protect the
23 interests of the Class members. Plaintiff has retained counsel experienced in complex
24 consumer class action litigation, and Plaintiff intends to prosecute this action vigorously.
25 Plaintiff has no adverse or antagonistic interests to those of the Class.

26 23. **Superiority.** A class action is superior to all other available means for the fair
27 and efficient adjudication of this controversy. Individualized litigation would create the
28 danger of inconsistent or contradictory judgments arising from the same set of facts.

1 Individualized litigation would also increase the delay and expense to all parties and the
2 court system from the issues raised by this action. By contrast, utilizing the class action
3 device here promotes judicial economy and consistency because it will resolve hundreds
4 of thousands of claims in a single action.

5 24. An ascertainable Class exists because Defendant maintains extensive records
6 and data comprised of its customers' and former customers' identification information,
7 which can be accessed by Defendant with reasonable effort.

8 **FIRST CAUSE OF ACTION**
9 **Violation of the Fair Credit Reporting Act ("FCRA")**
10 **15 U.S.C. § 1681b**

11 25. Plaintiff repeats and re-alleges the allegations contained in the paragraphs
12 above, as if fully set forth herein.

13 26. Plaintiff is a "consumer" as defined by 15 U.S.C. § 1681a(c). Defendant is a
14 "person" as defined by § 1681a(b). Equifax is a "consumer reporting agency" as defined
15 by § 1681a(f).

16 27. The FCRA prohibits a person or entity from issuing or obtaining a consumer's
17 credit report for an impermissible purpose. The statute provides in relevant part:

18 **(f) Certain use or obtaining of information prohibited:**

19 A person shall not use or obtain a consumer report for any purpose unless—

- 20 (1) the consumer report is obtained for a purpose for which the consumer
21 report is authorized to be furnished under this section; and
22 (2) the purpose is certified in accordance with section 1681e of this title by a
23 prospective user of the report through a general or specific certification.

24 15 U.S.C. § 1681b(f).

25 28. The FCRA enumerates the only permissible purposes for which a person or
26 entity may obtain a consumer's credit report:

27 **(a) In general**

28 . . . [A]ny consumer reporting agency may furnish a consumer report under the
following circumstances and no other:

. . .

1 (3) To a person which it has reason to believe—

2 (A) Intends to use the information in connection with a credit transaction
3 involving the consumer on whom the information is to be furnished
4 and involving the extension of credit to, or review or collection of an
5 account of, the consumer; or

6 ...

7 (F) otherwise has a legitimate business need for the information—

8 (i) in connection with a business transaction that is initiated by
9 the consumer; or

10 (ii) to review an account to determine whether the consumer
11 continues to meet the terms of the account.

12 15 U.S.C. § 1681b(3)(A), (F) (emphasis added).

13 29. Once Plaintiff successfully paid off the mortgage on or before January 28,
14 2016, the debtor-creditor relationship between the Parties was terminated and Plaintiff had
15 no other continuing credit obligations with Defendant. At that time, Defendant had actual
16 knowledge that it had no remaining legitimate business need or any other permissible
17 purpose to obtain Plaintiff's credit report. Nevertheless, Defendant obtained Plaintiff's
18 credit report on February 9, 2016.

19 30. Accordingly, Defendant intentionally and unlawfully accessed Plaintiff's
20 credit report from Equifax for an impermissible purpose. Defendant willfully engages in
21 a widespread scheme of impermissibly accessing Class members' credit reports who have
22 no existing accounts or other continuing obligations with Defendant.

23 31. Civil liability exists for anyone who willfully fails to comply with any
24 provision of the FCRA in the amount of "any actual damages sustained by the consumer
25 as a result of the failure or damages of not less than \$100 and not more than \$1,000." 15
26 U.S.C. § 1681n(a)(1)(A) (emphasis added). Together with any actual damages or statutory
27 damages awarded, a consumer is entitled to punitive damages, reasonable attorneys' fees,
28 and costs in an amount to be determined by the court. *Id.* § 1681n(a)(2)-(3).

32. Defendant's noncompliance with this provision of the FCRA is willful
because Defendant is, and at all times was, aware of its offending business practices and is
aware of its existing business relationships, or lack thereof, with each customer.

1 Defendant's repeated and willful violations of the FCRA are further evidenced by
2 Defendant's history of class actions and settlements arising from the same type of
3 offending conduct. *See e.g., Duncan v. JPMorgan Chase Bank, N.A.*, Civil No. SA-14-
4 CA-912-FB, 2016 WL 4419472 (W.D. Tex. May 24, 2016); *Sleezer v. Chase Bank USA,*
5 *N.A.*, Civil No. SA-14-CA-961-H (W.D. Tex. 2007).

6 33. As a direct and proximate result of Defendant's willful conduct, Plaintiff and
7 the Class members, and each of them, have suffered actual and concrete harm in the form
8 of, without limitation, invasion of their credit privacy and resulting damage to their credit
9 scores and Plaintiff and the Class members are entitled to statutory damages ranging from
10 \$100-\$1000 each, punitive damages, and reasonable attorneys' fees and costs pursuant to
11 15 U.S.C. § 1681n. In the alternative, Defendant is liable for negligent noncompliance in
12 impermissibly accessing Plaintiff's credit consumer report, in which case Defendant is
13 liable to Plaintiff for actual damages in an amount to be established at trial, together with
14 attorneys' fees and costs incurred in pursuing the action. *See* 15 U.S.C. § 1681o.

15 **VI. PRAYER FOR RELIEF**

16 WHEREFORE, Plaintiff prays for a judgment:

- 17 A. Certifying the Class as requested herein;
- 18 B. Awarding Plaintiff and the proposed Class members actual, statutory,
19 and punitive damages;
- 20 C. Awarding attorneys' fees and costs; and
- 21 D. Providing such further relief as may be just and proper.

22 ///

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1 **VII. DEMAND FOR JURY TRIAL**

2 34. Plaintiff hereby demands a jury trial for all claims so triable.

3
4 Date: July 19, 2017

**CARLSON LYNCH SWEET
KILPELA & CARPENTER, LLP**

5
6 */s/ Todd D. Carpenter*

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Attorneys for Plaintiff

JS 44 (Rev. 08/16)

CIVIL COVER SHEET

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

Tina Powers, on behalf of herself and all others similarly situated,

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

(c) Attorneys (Firm Name, Address, and Telephone Number)
Todd D. Carpenter, Brittany C. Casola (619-756-6994)
Carlson Lynch Sweet Kilpela & Carpenter, LLP
402 W. Broadway, 29th Floor, San Diego, CA 92101

DEFENDANTS

JPMorgan Chase Bank, N.A. and DOES 1 through 50, inclusive,

County of Residence of First Listed Defendant New York
(IN U.S. PLAINTIFF CASES ONLY)

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

Attorneys (If Known)

'17CV1462 AJB WVG

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	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

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

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 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 - 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 1681b

Brief description of cause:
Violation of the Fair Credit Reporting Act

VII. REQUESTED IN COMPLAINT:

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

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

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE
07/19/2017

SIGNATURE OF ATTORNEY OF RECORD
/s/ Todd D. Carpenter

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.Cv.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; **NOTE: 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 there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- 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 – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN 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 Rule 23, F.R.Cv.P.
 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 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

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: [JPMorgan Chase Faces Lawsuit Over 'Improper' Credit Score Requests](#)
