

HYDE & SWIGART, APC  
2221 CAMINO DEL RIO SOUTH SUITE 101  
SAN DIEGO, CA 92108

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*Attorneys for Plaintiff*  
Kelissa Ronquillo-Griffin

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

<p><b>KELISSA RONQUILLO-GRIFFIN, individually and on behalf of all others similarly situated,</b></p> <p style="text-align: right;">Plaintiff,</p> <p>v.</p> <p><b>JEFFERSON CAPITAL SYSTEMS, LLC.,</b></p> <p style="text-align: right;">Defendant.</p>	<p>Case No: <u>'18CV2789 AJB BLM</u></p> <p><b><u>CLASS ACTION</u></b></p> <p><b>COMPLAINT FOR DAMAGES FOR VIOLATIONS OF THE CALIFORNIA CONSUMER CREDIT REPORTING AGENCIES ACT, CAL. CIV. CODE § 1785.1, ET SEQ.</b></p> <p><b>JURY TRIAL DEMANDED</b></p>
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1 INTRODUCTION

- 2 1. The California legislature found that the banking system is dependent upon fair  
3 and accurate credit reporting; and that, inaccurate credit reports directly impair  
4 the efficiency of the banking system, and unfair credit reporting methods  
5 undermine the public confidence, which is essential to the continued  
6 functioning of the banking system. The California Consumer Credit Reporting  
7 Agencies Act was enacted to insure fair and accurate reporting, promote  
8 efficiency in the banking system and protect consumer privacy; and to ensure  
9 that consumer reporting agencies exercise their grave responsibilities with  
10 fairness, impartiality, and a respect for the consumer’s right to privacy because  
11 consumer reporting agencies have assumed such a vital role in assembling and  
12 evaluating consumer credit and other information on consumers.<sup>1</sup>
- 13 2. Plaintiff Kelissa Ronquillo-Griffin (“Plaintiff”), through her attorneys, brings  
14 this Complaint for damages, injunctive relief, and any other available legal or  
15 equitable remedies resulting from the illegal actions of Defendant, Jefferson  
16 Capital Systems, LLC. (“Defendant”), in reporting erroneous negative and  
17 derogatory information on Plaintiff’s credit report, as that term is defined by  
18 Cal. Civ. Code § 1785.3(c).
- 19 3. More specifically, Plaintiff brings this Complaint, by and through her  
20 attorneys, for damages arising out of the systematic issuance of erroneous  
21 credit reports by Defendant. Defendant has erroneously reported continual  
22 monthly payment obligations on accounts that have been discharged.
- 23 4. Plaintiff makes these allegations on information and belief, with the exception  
24 of allegations that pertain to Plaintiff, or to Plaintiff’s counsel, which Plaintiff  
25 alleges on personal knowledge.
- 26 5. While many violations are described below with specificity, this Complaint  
27 alleges violations of the statutes cited in their entirety.

28 <sup>1</sup> Cal. Civ. Code § 1785.1

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- 1 6. Unless otherwise stated, all the conduct engaged in by Defendant occurred in  
2 California.
- 3 7. Any violations by Defendant were knowing and intentional, and that Defendant  
4 did not maintain procedures reasonably adapted to avoid any such violation.
- 5 8. Unless otherwise indicated, the use of Defendant’s name in this Complaint  
6 includes all agents, employees, officers, members, directors, heirs, successors,  
7 assigns, principals, trustees, sureties, subrogees, representatives, and insurers of  
8 Defendant.

9 **JURISDICTION & VENUE**

- 10 9. Jurisdiction is proper under the Class Action Fairness Act (“CAFA”), 28  
11 U.S.C. § 1332(d)(2), because Plaintiff, a resident of the State of California,  
12 seeks relief on behalf of a California class, which will result in at least one  
13 class member belonging to a different state than that of Defendant, a national  
14 credit union with its principal place of business in the State of Georgia.
- 15 10. Plaintiff also seeks the greater of statutory punitive damages of \$5,000 per  
16 violation per violation pursuant to Cal. Civ. Code § 1785.31, which, when  
17 aggregated among a proposed class number in the tens of thousands, exceeds  
18 the \$5,000,000 threshold for federal court jurisdiction.
- 19 11. Therefore, both diversity jurisdiction and the damages threshold under CAFA  
20 are present, and this Court has jurisdiction.
- 21 12. Because Defendant conducts business within the State of California, personal  
22 jurisdiction is established.
- 23 13. Venue is proper pursuant to 28 U.S.C. § 1391 for the following reasons:  
24 (i) Plaintiff resides in the County of San Diego, State of California which is  
25 within this judicial district; (ii) the conduct complained of herein occurred  
26 within this judicial district; and (iii) Defendant conducted business within this  
27 judicial district at all times relevant.  
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**PARTIES & DEFINITIONS**

- 14. Plaintiff is a natural person who resides in the City of San Diego, County of San Diego, in the State of California. Plaintiff is a “consumer” as that term is defined by Cal. Civ. Code § 1785.3(c).
- 15. Defendant is a Georgia corporation with its headquarters located in St. Cloud Minnesota and authorized to do business in the State of California.
- 16. Defendant is a partnership, corporation, association, or other entity, and is therefore a “person” as that term is defined by Cal. Civ. Code § 1785.3(j).
- 17. The cause of action herein pertains to Plaintiff’s “consumer credit report” as that term is defined by Cal. Civ. Code § 1785.3(d), in that inaccurate representations of Plaintiff’s credit worthiness, credit standing, and credit capacity were made via written, oral, or other communication of information by a consumer credit reporting agency, which is used or is expected to be used, or collected in whole or in part, for the purposes of serving as a factor in establishing Plaintiff’s eligibility for, among other things, credit to be used primarily for personal, family, household and employment purposes.

**FACTUAL ALLEGATIONS**

- 18. On or around October 10, 2011, Plaintiff opened an Emblem MasterCard credit card with Defendant (“the Debt”).
- 19. Plaintiff filed for bankruptcy on September 25, 2014.
- 20. Plaintiff’s Debt to Defendant was included in Plaintiff’s bankruptcy petition.
- 21. Subsequently, on December 30, 2014, the Debt was discharged pursuant to a court order that was mailed to Defendant by the bankruptcy court. The order advised Defendant that the Debt had been discharged.
- 22. Defendant did not initiate an adversarial proceeding to have the debt declared “non-dischargeable” pursuant to 11 U.S.C. § 523 *et seq.*
- 23. Defendants also did not request relief from the “automatic stay” codified at 11 U.S.C. §362 *et seq.* while Plaintiff’s Bankruptcy was pending to pursue Plaintiff on any *personal* liability for any of the underlying Debts.

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1 24. Plaintiff did not conduct any business nor incur any additional financial  
2 obligations with Defendant since the date of the discharge of her Bankruptcy.

3 25. Following the bankruptcy, Plaintiff learned Defendant reported post-  
4 Bankruptcy derogatory credit information regarding the obligations on  
5 Plaintiff's credit reports, thereby causing erroneous and negative information in  
6 Plaintiff's credit files.

7 26. An Equifax credit report dated December 19, 2016, reported the following  
8 information:

- 9 • Re: Account Number XXXXXX000111; Scheduled Payment Amount:  
10 \$17.

11 27. Because Plaintiff's account was discharged in Bankruptcy, Defendant should  
12 have reported \$0 for Plaintiff's monthly payments.

13 28. Failure to report consistent with the discharge, Defendant furnished inaccurate  
14 information as set forth herein. Instead, Defendant reported information to  
15 Equifax, a credit reporting agency, that it had reason to know or should have  
16 known was inaccurate. The bankruptcy court mailed Defendant a clear and  
17 unambiguous order that definitively discharged the Debt. Defendant, therefore,  
18 had explicit and authoritative evidence that the Debt was discharged, meaning  
19 monthly payments were no longer due. Thus, Defendant knew or should have  
20 known that the information it provided to Equifax was inaccurate. By reporting  
21 it, Defendant violated California Civil Code section 1785.25(a).

22 29. Further, to report these continuing monthly payment obligations is patently  
23 incorrect, misleading, and fails to comply with the Metro 2 Guidelines.

24 30. In an effort to comply with the CCCRAA in the most efficient manner,  
25 consumer reporting agencies (such as Experian, Equifax, and Transunion) have  
26 adopted a uniform system to gather and report information about consumers as  
27 well as process and correct inaccuracies and disputes.  
28

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- 1 31. “Metro 2” is the credit reporting software that was developed as a standard for  
2 the credit reporting industry and provides one standard layout to be used by all  
3 furnishers of information to the consumer reporting agencies.
- 4 32. Metro 2 provides a resource guide to each user, which explains the proper  
5 procedures for reporting information, reporting on investigations, and  
6 correcting information.
- 7 33. Individual furnishers must be approved by each bureau to report information to  
8 that bureau.
- 9 34. Once approved, the furnishers are able to provide information to credit bureaus  
10 through the Metro 2 system.
- 11 35. Furnishers’ utilization of the Metro 2 reporting standard correctly is crucial  
12 because the Metro 2 system creates a uniform standard for the meaning given  
13 to each field provided, which fosters consistency in how furnishers formulate  
14 data to report to the credit bureaus, which ultimately leads to objective credit  
15 evaluations.
- 16 36. By reporting inaccurate information to the credit bureaus, Defendant has  
17 misrepresented the status of Plaintiff’s financial obligations, specifically  
18 Plaintiff’s payment obligations for a discharged debt.
- 19 37. As a result of Defendant’s improper and unauthorized conduct, Plaintiff has  
20 suffered actual damages due to Defendant’s misrepresentations regarding  
21 Plaintiff’s current payment obligations.
- 22 38. This inaccurate reporting will adversely affect Plaintiff’s credit decisions  
23 because credit guarantors are made aware of Plaintiff’s current income during  
24 the application process.
- 25 39. By reporting continuing monthly payments as opposed to a \$0 monthly  
26 payment, Defendant misrepresents Plaintiff’s monthly financial obligations and  
27 gives the false impression that Plaintiff has less funds available to satisfy the  
28 new credit currently being applied for.

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1 40. Defendant's inaccurate and negative reporting damaged Plaintiff's  
2 creditworthiness.

3 41. Plaintiff's right to be able to apply for credit based on accurate information has  
4 been violated, placing Plaintiff at increased risk of not being able to obtain  
5 valuable credit and adversely affecting Plaintiff's credit rating.

6 **CLASS ALLEGATIONS**

7 42. Plaintiff brings this action on Plaintiff's own behalf, and on behalf of all others  
8 similarly situated.

9 43. Plaintiff is among many thousands of persons in the United States who has had  
10 his or her credit information compiled and reported by Defendant regarding  
11 financial obligations incurred that have been subsequently discharged in  
12 bankruptcy.

13 44. Defendant has knowledge of when debts are discharged in bankruptcy because  
14 they are notified by the bankruptcy court.

15 45. Despite this knowledge, Defendant has a deliberate policy of not accurately  
16 reporting that said debts are no longer currently still due and owing because  
17 they have been discharged.

18 46. As a result of Defendant's refusal to make such updates to consumers' credit  
19 reports, debts that have been discharged are instead listed on Class Members'  
20 credit reports as a current debt that is due.

21 47. These notations clearly indicate to potential creditors, employers, or other third  
22 parties that a Class Member still owes a debt. These notations therefore  
23 adversely affect a Class Member's ability to obtain credit or employment.

24 48. Defendant knew that the existence of such inaccurate information in the Class  
25 Members' credit reports would damage the Class Members' credit ratings and  
26 their ability to obtain new credit, a lease, a mortgage or employment, all of  
27 which may be essential to a consumer's regular day-to-day life.

28 49. Plaintiff defines the Class as:  
all persons with addresses within California; (ii) who have  
account(s) with Defendant; (iii) where said account(s) was

1 discharged in bankruptcy; but (v) where Defendant  
2 continued to reported a monthly payment obligation; (viii)  
3 within two years prior to the filing of the Complaint in this  
4 action.

50. Defendant and its employees or agents are excluded from the Class.

51. This suit seeks damages on behalf of the Class. This suit does not request any  
5 recovery for personal injury and claims related thereto. Plaintiff reserves the  
6 right to expand the Class definition to seek recovery on behalf of additional  
7 persons as facts are learned in through investigation and discovery.

52. Plaintiff does not know the exact number of persons in the Class, but believes  
8 them to be in the several hundreds, if not thousands, making joinder of all these  
9 actions impracticable.

53. The identity of the individual members is ascertainable through Defendant's  
10 and/or Defendant's agents' records or by public notice.

54. There is a well-defined community of interest in the questions of law and fact  
11 involved affecting the members of The Class. The questions of law and fact  
12 common to The Class predominate over questions affecting only individual  
13 class members, and include, but are not limited to, the following:

- 14 a. Whether Defendant has a standard procedure of continuing to report a  
15 monthly payment obligation after an account is discharged in  
16 bankruptcy;
- 17 b. Whether such practices violate the CCCRAA;
- 18 c. Whether members of the Class are entitled to the remedies under the  
19 CCCRAA;
- 20 d. Whether members of the Class are entitled to declaratory relief;
- 21 e. Whether Defendant should be enjoined from reporting such inaccurate  
22 information; and
- 23 f. Whether members of the Class are entitled to injunctive relief.

24 55. Plaintiff will fairly and adequately protect the interest of the Class.  
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1 56. Plaintiff has retained counsel experienced in consumer class action litigation  
2 and in handling claims involving credit reporting practices.

3 57. Plaintiff’s claims are typical of the claims of The Class, which all arise from  
4 the same operative facts involving reporting a monthly payment obligation  
5 after an account is discharged in bankruptcy.

6 58. A class action is a superior method for the fair and efficient adjudication of this  
7 controversy. Class-wide damages are essential to induce Defendant to comply  
8 with federal law. The interest of Class members in individually controlling the  
9 prosecution of separate claims against Defendant is small because the  
10 maximum statutory damages in an individual action for CCCRAA violations  
11 are minimal. Further, Members of the Class are likely to be unaware of their  
12 rights.

13 59. Management of these claims is likely to present significantly fewer difficulties  
14 than those presented in many class claims, e.g., securities fraud.

15 60. Plaintiff and the Class seek injunctive relief against Defendant to refrain from  
16 reporting such inaccurate information when Defendant knows or should know  
17 the information is inaccurate.

18 61. Defendant has acted on grounds generally applicable to the Class thereby  
19 making appropriate final declaratory relief with respect to the Class as a whole.

20 **CAUSE OF ACTION**

21 **VIOLATION OF THE CALIFORNIA CREDIT REPORTING AGENCIES ACT**

22 **(CCCRAA)**

23 • **Cal. Civ. Code § 1785.1, et seq.**

24 62. Plaintiff incorporates by reference all of the above paragraphs of this  
25 Complaint as though fully stated herein.

26 63. The foregoing acts and omissions constitute numerous and multiple violations  
27 of the California Consumer Credit Reporting Agencies Act.

28 64. In the regular course of its business operations, Defendant routinely furnishes  
information to credit reporting agencies pertaining to transactions between

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1 Defendant and Defendant’s consumers, so as to provide information to a  
 2 consumer’s credit worthiness, credit standing and credit capacity.  
 3 65. Because Defendant is a partnership, corporation, association, or other entity,  
 4 and is therefore a “person” as that term is defined by Cal. Civ. Code §  
 5 1785.3(j), Defendant is and always was obligated to not furnish information on  
 6 a specific transaction or experience to any consumer credit reporting agency if  
 7 the person knows or should have known that the information is incomplete or  
 8 inaccurate, as required by Cal. Civ. Code § 1785.25(a). Defendant knew or  
 9 should have known that Defendant was not able to report monthly payment  
 10 obligations on accounts that have been discharged in bankruptcy. Thus,  
 11 Defendant violated Cal. Civ. Code § 1785.25(a).

**PRAYER FOR RELIEF**

12 WHEREFORE, Plaintiff and the Class Members pray for judgment as follows:

- 13 • Certifying the Classes as requested herein;
- 14 • Appointing Plaintiff’s Counsel as Class Counsel;
- 15 • An award of actual damages, in an amount to be determined at trial
- 16 pursuant to Cal. Civ. Code §1785.31(a)(2)(A), against Defendant;
- 17 • An Award of attorneys’ fees and costs pursuant to Cal. Civ. Code §
- 18 1785.31(a)(1); and, Cal. Civ. Code § 1785.31(d) against each named
- 19 Defendant individually;
- 20 • An award of punitive damages of \$100-\$5,000 per willful violation of
- 21 Cal. Civ. Code § 1785.25(a), pursuant to Cal. Civ. Code §
- 22 1785.31(a)(2)(B);
- 23 • For equitable and injunctive relief pursuant to Cal. Civ. Code §
- 24 1785.31(b); and
- 25 • Any and all other relief that this Court deems just and proper.

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**TRIAL BY JURY**

66. Pursuant to the Seventh Amendment to the Constitution of the United States of America, Plaintiff is entitled to, and demands, a trial by jury.

Dated: December 11, 2018

**Hyde & Swigart, APC**

By: *s/ Yana A. Hart*

Yana A. Hart, Esq.

Attorney for Plaintiff

Email: yana@westcoastlitigation.com

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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

Kelissa Ronquillo-Griffin, Individually and on behalf of all others similarly situated

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

(c) Attorneys (Firm Name, Address, and Telephone Number) Yana A. Hart, Esq., Hyde & Swigart 619-233-7770 2221Camino Del Rio South, Suite 101, San Diego, CA 92108

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) '18CV2789 AJB BLM

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

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 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 and business location (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, 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, 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): 28 U.S.C. §1332(d)(2) et seq. ("CAFA") Class Action Fairness Act 28:1453
Brief description of cause: Defendant violated California Consumer Credit Reporting Agencies Act ("CCCRAA")

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 5,000,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE 12/11/2018 SIGNATURE OF ATTORNEY OF RECORD s/ Yana A. Hart

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 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.  
 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.
- 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: [Jefferson Capital Systems Sued Over Allegedly Inaccurate Reporting of Discharged Debt](#)

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