

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF ALABAMA

Brittany Perkins  
Plaintiff,

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) JURY TRIAL DEMAND

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vs .

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CASE NO:

23-275-TFM-N

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CREDIT COLLECTION  
SERVICES

)

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Defendant,

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COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is a civil action for actual and statutory damages brought by Plaintiff Brittany Perkins an individual consumer, against Defendant, CREDIT COLLECTION SERVICES, for violations of the Fair Debt Collection Practices Act, 15 U.S.C § 1692et seq. (hereinafter "FDCPA"), which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

II. JURISDICTION AND VENUE

2. Jurisdiction of this court arises under 15 U.S.C § 1692k(d) 28 U.S.C 1331. The venue in this District is proper in that the Defendants transacts

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business in Prichard, Alabama, and the conduct complained of occurred in Prichard, Alabama.

### III. PARTIES

3. Plaintiff Brittany Perkins (Hereinafter "Ms.Perkins) is a natural person residing in Prichard, Alabama. Ms. Perkins is a consumer as defined by the Fair Debt Collection Practice Act, 15 U.S.C 1692a(3).
4. Plaintiff alleged "debt" as defined by the FDCPA, 15 U.S.C 1692a(5) at issue arose from a transaction entered into primarily for personal, family or household purposes.
5. Upon information and belief, Credit Collection Services is a Massachusetts corporation with its principal place of business located at 725 CANTON ST. NORWOOD, MA 02062.
6. Defendant CREDIT COLLECTION SERVICES., is engaged in the collection of debt from consumers using the mail and telephone. Defendants regularly attempt to collect consumers' debts alleged to be due to another's.
7. Defendant CREDIT COLLECTION SERVICES., (hereinafter referred to as "Debt Collector") is a "debt collector" as defined by the FDCPA, U.S.C. 1692a(6).

#### IV. FACTS OF THE COMPLAINT

8. On or about May 25, 2023 Plaintiff received a Short Message Service or SMS (also known as “text message”) at 10:12 AM CST and on May 26, 2023 at 1:54 PM CST from Defendant, attempting to collect an alleged debt allegedly owed to GENERAL INSURANCE COMPANY.  
  
However, on or about May 26, 2023 at 1:15 PM CST the Plaintiff sent a response message back stating that “I refuse to pay the debt” pursuant to 15 U.S.C 1692c(c).
9. On or about May 26, 2023, at 1:15 PM CST, Plaintiff received an additional SMS from Defendant as follows:”CREDIT COLLECTION SERVICES (a debt collector does not monitor this telephone number. For help, please call 617-644-7300. Thank you.” Followed by another text message at 1:54 PM as follows “This message is from Credit Collection Services, a debt collector. We provide self service options at sms.ccspayment.com. Reply help for info or STOP to end” This is in violation of 15 U.S.C. §1692c(c).
10. Despite receiving the aforementioned text message on May 26, 2023, CREDIT COLLECTION SERVICES refused to cease communication, which is a violation in 15 U.S.C. 1692cc.

11. Plaintiff has suffered actual damages because of the illegal debt collection communications by Defendant in the form of anger, anxiety, decreased ability to focus on tasks while at work, frustration, amongst other negative emotions, as well as damages to FICO scores.

**V. FIRST CLAIM FOR RELIEF Defendant  
CREDIT COLLECTION SERVICES.,**

**15 U.S.C. §1692c(c)**

12. All preceding paragraphs are re-alleged.
13. The Debt Collector violated the FDCPA.
14. The Debt Collector's violations include, but are not limited to, the following: The Debt Collector violated 15 U.S.C § 1692c(c) by failing to cease collection after receiving written notice.
15. As a result of the above violations of the FDCPA, the Defendant is liable to Plaintiff for actual damages, statutory damages, and costs.

**VI. JURY DEMAND AND PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Brittany Perkins respectfully demands a jury trial and requests that judgment be entered in favor of Plaintiff and against the Debt Collector for:

- A. Judgment for the violations occurred for violating the FDCPA;

B. Actual damages pursuant to 15 U.S.C 1692k(1)(2);

C. Statutory damages pursuant to 15 U.S.C 1692k(2);

Respectfully Submitted,

Brittany Perkins  
**540 Ramona St**  
**Prichard, Al 36610**  
**Classicconsumer444@gmail.com**