

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA**

| | |
|--------------------------------------|------------------------------|
| SADE TAYLOR |) JURY TRIAL DEMANDED |
| Plaintiff, |) |
| |) |
| v. |) Case No. |
| |) |
| SECURITY CREDIT SERVICES, LLC |) |
| Defendant, |) |
| |) |
| |) |

COMPLAINT

I. INTRODUCTION

1. This is an action for actual and statutory damages brought by Plaintiff Sade Taylor, an individual consumer, against Defendant Security Credit Services, LLC for violations of the Fair Debt Collection Practices Act, 15 U.S.C § 1692 *et 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. Venue in this District is proper in that the Defendant transacts business in Tampa, Florida and the conduct complained of occurred in Tampa, Florida.

III. PARTIES

3. Plaintiff Sade Taylor (hereinafter “Plaintiff”) is a natural person residing in Tampa, Florida. Plaintiff is a consumer as defined by the Fair Debt Collection Practices Act, 15 U.S.C. §1692a(3).
4. Plaintiff is alleged to owe a “debt” as defined by the FDCPA, 15 U.S.C 1692a(5) and the alleged debt at issue arose from a transaction entered into primarily for personal use.
5. Upon information and belief, Security Credit Services, LLC is a Mississippi corporation with its principal place of business located at 306 Enterprise Dr., Oxford, MS 38655
6. Defendant is engaged in the collection of debt from consumers using the mail and telephone. Defendant regularly attempts to collect consumers’ debts alleged to be due to another.

IV. FACTS OF THE COMPLAINT

7. Defendant Security Credit Services, LLC, (hereinafter referred to as “Debt Collector”) is a “debt collector” as defined by the FDCPA, 15 U.S.C 1692a(6).
8. On or about June 12, 2023, Plaintiff mailed a dispute letter via USPS certified mail to Debt Collector disputing an alleged debt owed to Pentagon Federal Credit Union.

9. Tracking # 7022 0410 0000 4422 4619
10. On or about June 22, 2023, Plaintiff received notice from USPS that her letter was received by Defendant.
11. Pursuant to Plaintiff's rights under the FDCPA and Regulation F, the letter stated that email was the only convenient form of communication and included Plaintiff's email address.
12. Despite these clear instructions, and in an attempt to intimidate, harass, and oppress Plaintiff, on or about August 2, 2023, Plaintiff received a letter from Security Credit Services, LLC in response to her dispute letter which constitutes a communication about the debt and an attempt to collect the debt.
13. The letter was sent to confuse, harass and deceive Plaintiff.
14. Plaintiff has suffered actual damages as a result of the illegal collection tactics by Defendant in the form of personal embarrassment. Plaintiff shares a mailbox with cohabitants who collect and distribute mail items. Plaintiff's insistence on email communication stems from genuine concern about her privacy, as her living situation exposes mailed letters to the scrutiny of her cohabitants, thereby revealing the collection activity to a wider audience.

15. Plaintiff has also suffered actual damages in the form of invasion of privacy, intrusion upon seclusion, loss of productivity, emotional distress, frustration, anger, humiliation and other negative emotions.
16. Security Credit Services, LLC violated 15 U.S. Code 1692c(a)(1) by communicating with Plaintiff at a place Defendant knew was no longer convenient.

**V. FIRST CLAIM FOR RELIEF
(Security Credit Services, LLC)
15 U.S.C 1692c(a)(1)**

17. Plaintiff re-alleges and reincorporates all previous paragraphs as fully set out herein.
18. Debt Collector violated the FDCPA.
19. Debt Collector's violations include, but are not limited to the following:
 - (a) Debt Collector violated 15 U.S.C § 1692c(a)(1) of the FDCPA by communicating with Plaintiff at a place Defendant knew was no longer convenient.
20. As a result of the above violations of the FDCPA, Defendant is liable to Plaintiff for actual damages, statutory damages and costs.

VI. JURY DEMAND AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully demands a jury trial and requests that judgment be entered in favor of Plaintiff and against 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);

D. Costs and reasonable attorney's fees pursuant to 15 U.S.C 1692k(3);

E. For such other and further relief as the Court may deem just and proper.

Respectfully submitted:

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