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Steven D. Grierson
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Luba Dace
[redacted]
[redacted]
In Propria Persona

DISTRICT COURT
CLARK COUNTY, NEVADA

LUBA DACE, Plaintiff, v. TD BANK/TARGET, Defendant.	Case No.: A-23-876885-C Dept. No.: 11 COMPLAINT FOR VIOLATION OF FDCPA 15 U.S.C. §1692

Comes now, Luba Dace in Propria Persona, in the above styled cause and for his complaint against TD BANK/TARGET and states as follows:

Jurisdiction and Venue

This is an action by a consumer for violations of the Fair Debt Collection Practices Act, (15 U.S.C. § 1692 et seq. [hereinafter "FDCPA"]). Therefore, subject matter jurisdiction exists under 28 U.S.C. § 1331.

Parties

The Plaintiff, Luba Dace [Plaintiff] is a woman.

Defendant, TD BANK/TARGET [Defendant] is a company that engages in the business of issuing consumer credit. (i.e., a creditor under the FDCPA) and it does

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business in this judicial district. Its principal place of business is outside of the state of Nevada.

Factual Allegations

Within the last three (3) months Plaintiff attempted several times to validate a debt purported to be owed to the Defendant. Plaintiff made repeated mailings [on or around 20 July 2023, 4 August 2023, 28 August 2023] that sought to validate the debt so Plaintiff could pay. (ex. A) Defendant never validated the debt, and the inaccurate, unvalidated **TD BANK/TARGET 585975XXX...**still appears on Plaintiff's credit reports in violation of the FDCPA. Plaintiff continues to suffer emotional distress and anxiety as a result of this breach of duty by Defendant.

Relief Sought

Delete **TD BANK/TARGET 585975XXX...**from Plaintiff's credit file with both the major and smaller reporting agencies. Any other relief this court may deem just and proper.

Signed under penalty of perjury.

Luba Dace

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Luba Dace