Electronically Filed
9/29/2023 2:49 PM
Steven D. Grierson
CLERK OF THE COURT

Luba Dace
Philip Dace
[redacted]
Las Vegas NV, 89118
[redacted]

DISTRICT COURT
CLARK COUNTY, NEVADA

LUBA DACE, PHILIP 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 and Philip Dace in Propria Persona, in the above styled cause and for their 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. Plaintiff, [Plaintiff] Philip Dace is man.

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 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 Plaintiffs attempted several times to validate a debt purported to be owed to the Defendant. Plaintiffs made repeated mailings [on or around 20 July 2023, 4 August 2023, 28 August 2023] that sought to validate the debt so Plaintiffs could pay. Defendant never validated the debt, and the inaccurate, unvalidated **TD BANK/TARGET 585975XXX...** and **TD BANK/TARGET 585975218186XXX...**still appears on Plaintiff's respective credit reports in violation of the FDCPA. Plaintiffs continue to suffer emotional distress and anxiety as a result of this breach of duty by Defendant.

Relief Sought

Delete **TD BANK/TARGET 585975XXX...** and **TD BANK/TARGET 5859752181 86XXX...**from both Plaintiffs respective credit files with both the major and smaller reporting agencies. Any other relief this court may deem just and proper.

Signed under penalty of perjury.

29 SEP 2023

I AFFIRM that a copy of this COMPLAINT was mailed/delivered to Defendant.

Philip Dace

_____
Philip Dace

Luba Dace

_____
Luba Dace