

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS

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UNITED STATES OF AMERICA,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.
	)	
UNITED RECOVERY SYSTEMS, INC.,	)	
a Texas corporation,	)	
	)	
Defendant.	)	
	)	
	)	

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**COMPLAINT FOR CIVIL PENALTIES, INJUNCTIVE, AND OTHER RELIEF**

Plaintiff, the United States of America, acting upon notification and authorization to the Attorney General by the Federal Trade Commission (“Commission”), for its Complaint alleges that:

1. Plaintiff brings this action under Sections 5(m)(1)(A), 13(b), and 16(a) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 45(m)(1)(A), 53(b), and 56(a) and Section 814 of the Fair Debt Collection Practices Act (“FDCP Act”), 15 U.S.C. § 1692I, to obtain monetary civil penalties and injunctive or other relief for the defendant’s violations of the FDCP Act.

**JURISDICTION AND VENUE**

2. This Court has jurisdiction over the action pursuant to 28 U.S.C. §§ 1331, 1337(a), 1345, and 1355, and under 15 U.S.C. §§ 45(m)(1)(A), 53(b), 56(a) and 1692I.

3. Venue in the for the Southern District of Texas is proper under 15 U.S.C. § 53(b) and under 28 U.S.C. §§ 1391(b) - (c) and § 1395(a).





of 1990, 28 U.S.C. § 2461, as amended, authorize the Court to award monetary civil penalties of not more than \$11,000 for each violation of the FDCP Act.

14. Each instance within five years preceding the filing of this Complaint, in which defendant has failed to comply with the FDCP Act in one or more of the ways described above, constitutes a separate violation for which plaintiff seeks monetary civil penalties.

15. Under Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), this Court is authorized to issue a permanent injunction to ensure that defendant will not continue to violate the FDCP Act.

**PRAYER**

5. Award plaintiff such additional relief as the Court deems just and proper.

DATED:

OF COUNSEL:

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