

STYLE #1

Complaint

1. Nature of the Action
2. Jurisdiction
3. Parties
4. Venue
5. Factual Allegations
 - a. Facts e.g. sent dispute letter
 - b. Facts e.g. continued collection activities
 - c. Facts
6. Count I
 - a. Violations of the FDCPA
 - i. Statement(s) of violation, who and when and how.
 - ii. Wherefore:
 1. Judgement
 2. Statutory Damages
 3. Attorney Fees
 4. interest as allowed
 5. damages court may deem just and proper
7. Count II
 - a. Violations of the TDCPA
 - i. Statement(s) of violation, who and when and how.
 - ii. Wherefore:
 1. Judgement
 2. Statutory Damages
 3. Attorney Fees
 4. interest as allowed
 5. damages court may deem just and proper
8. Count III
 - b. Violations of the DTPA
 - i. Statement(s) of violation, who and when and how.
 - ii. Wherefore:
 1. Judgement
 2. Statutory Damages
 3. Attorney Fees
 4. interest as allowed

5. damages court may deem just and proper

9. Count IV

a. Violations of the FCRA

i. Statement(s) of violation, who and when and how.

ii. Wherefore:

1. Judgement

2. Statutory Damages

3. Attorney Fees

4. interest as allowed

5. damages court may deem just and proper

10. Count V (Not suggested for the Novice)

a. Violations of the UDAP – Commercial Code ANN.

i. Statement(s) of violation, who and when and how.

ii. Wherefore:

1. Judgement

2. Statutory Damages

3. Attorney Fees

4. interest as allowed

5. Punitive Damages

6. damages court may deem just and proper

Demand for Trial by Jury