

1 Robert R. Berk, Bar #010162
Luan Gurra, Bar #037548
2 JONES, SKELTON & HOCHULI P.L.C.
40 N. Central Avenue, Suite 2700
3 Phoenix, Arizona 85004
Telephone: (602) 263-1782
4 Fax: (602) 200-7818
rberk@jshfirm.com
5 lgurra@jshfirm.com

6 Attorneys for Defendants CHBD Law LLP
and Cruz

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF ARIZONA**

10 Sara M. Reed,

11 Plaintiff,

12 v.

13 CHBD Law LLP, an Arizona limited
liability partnership; Charlene Cruz and
14 John Doe Cruz, husband and wife; Does I-
X,

15 Defendants.
16

No. 2:25-cv-04355-ASB

**DEFENDANTS' ANSWER TO
PLAINTIFF'S COMPLAINT**

17 Defendants CHBD Law LLP and Charlene Cruz and John Doe
18 (“Defendants”), for their Answer to Plaintiff’s Complaint, admit, deny and allege as
19 follows.

20 1. Defendants are without sufficient information to form a belief as the
21 truth of the allegations in paragraph 1 and therefore deny same.

22 2. Defendants are without sufficient information to form a belief as the
23 truth of the allegations in paragraph 2 and therefore deny same.

24 3. Defendants are without sufficient information to form a belief as the
25 truth of the allegations in paragraph 3 and therefore deny same.

26 4. Defendants admit the allegations in paragraph 4.

27 5. Defendants admit the allegations in Paragraph 5.
28

1 6. Regarding paragraph 6, Defendants deny they violated the FDCPA
2 but otherwise admit the allegations.

3 7. Regarding paragraph 7, Defendants deny they committed all acts
4 alleges in the Complaint but admit the remaining allegations.

5 8. Upon information and belief, Defendants admit the allegations in
6 paragraph 7.

7 9. Defendants admit the allegations in paragraph 9.

8 10. Defendants admit the allegations in paragraph 10.

9 11. Regarding paragraph 11, Defendants admit that Defendant Cruz is
10 married, affirmatively allege her spouse's actual name is Paul Colin Rambeau, admit
11 Defendants Cruz reside in Maricopa County, Arizona, and deny the remaining allegations.
12 Any actions or inactions alleged in this Complaint as to Defendant Cruz were not
13 undertaken on behalf of, or for the benefit of, her marital community, but instead in her
14 capacity as an agent for, on behalf of, and in furtherance of her representation of Paradise
15 Valley Terrace II Homeowners Association and in her capacity as employe of Defendant
16 CHDB Law.

17 12. Defendants CHDB and Defendant admit that allegations in Paragraph
18 12 except to the extent those allegations pertain to Defendant Paul C. Rambeau.

19 13. Defendants are without sufficient information to form a belief as the
20 truth of the allegations in paragraph 13 and therefore deny same.

21 14. Defendants are without sufficient information to form a belief as the
22 truth of the allegations in paragraph 14 and therefore deny same.

23 15. Defendants admit the allegations in paragraph 15.

24 16. Defendants admit the allegations in paragraph 16.

25 17. Defendants admit the allegations in paragraph 17.

26 18. Defendants admit the allegations in paragraph 18.

27 19. Defendants admit the allegations in paragraph 19.

28

1 20. Defendants admit the allegations in paragraph 20 and affirmatively
2 allege that the referenced ten years commenced, at the earliest, on November 25, 2014.

3 21. Defendants deny the allegations in paragraph 21.

4 22. Defendants admit the allegations in paragraph 22.

5 23. Defendants deny the allegations in paragraph 23.

6 24. Defendants admit the allegations in paragraph 24.

7 25. Regarding paragraph 25, Defendants admit that a paralegal in
8 CHBD's office had a telephone conversation with Plaintiff on November 12, 2024, but are
9 without sufficient information to form a belief as the truth of the remaining allegations in
10 paragraph 25 and therefore deny same.

11 26. Defendants are without sufficient information to form a belief as the
12 truth of the allegations in paragraph 26 and therefore deny same.

13 27. Defendants are without sufficient information to form a belief as the
14 truth of the allegations in paragraph 27 and therefore deny same.

15 28. Defendants deny the allegations in paragraph 28 and affirmatively
16 allege that the Judgment Renewal Affidavit was executed on November 21, 2024, but not
17 filed until November 22, 2024.

18 29. Defendants deny the allegations of wrongdoing in paragraph 29 but
19 admit that Defendant CHDB is vicariously liable for any acts or omissions by Defendant
20 Cruz.

21 30. Regarding paragraph 30, Defendants are without sufficient
22 information to form a belief as to the truth of the allegation about what Plaintiff knew or
23 did not know and therefore deny said allegation. Defendants admit the remaining
24 allegations in paragraph 30.

25 31. Defendants admit the allegations in paragraph 31.

26 32. Regarding paragraph 32, Defendants are without sufficient
27 information to form a belief as to the truth of the allegation about what Plaintiff knew or
28

1 did not know and therefore deny said allegation. Defendants admit the remaining
2 allegations in paragraph 32

3 33. Regarding paragraph 33, Defendants deny that the Judgment Renewal
4 Affidavit was wrongfully recorded but admit the remaining allegations.

5 34. Defendants are without sufficient information to form a belief as the
6 truth of the allegations in paragraph 34 and therefore deny same.

7 35. Defendants are without sufficient information to form a belief as the
8 truth of the allegations in paragraph 35 and therefore deny same.

9 36. Defendants are without sufficient information to form a belief as the
10 truth of the allegations in paragraph 36 and therefore deny same.

11 37. Defendants are without sufficient information to form a belief as the
12 truth of the allegations in paragraph 37 and therefore, deny same.

13 38. Defendants are without sufficient information to form a belief as the
14 truth of the allegations in paragraph 38 and therefore, deny same.

15 39. Defendants are without sufficient information to form a belief as the
16 truth of the allegations in paragraph 39 and therefore, deny same.

17 40. Defendants are without sufficient information to form a belief as the
18 truth of the allegations in paragraph 40 and therefore, deny same.

19 41. Defendants deny the allegations in paragraph 41.

20 42. Defendants deny the allegations in paragraph 42.

21 43. Defendants deny the allegations in paragraph 43.

22 44. Defendants incorporate their responses to paragraphs 1 through 43,
23 above.

24 45. Defendants deny the allegations in paragraph 45.

25 46. Defendants deny the allegations in paragraph 46.

26 47. Defendants deny the allegations in paragraph 47.

27 48. Defendants deny the allegations in paragraph 48.

28

1 49. Defendants incorporate the allegations asserted in paragraphs 1
2 through 48 above.

3 50. Paragraph 50 states a legal conclusion which does not call for an
4 admission or denial.

5 51. Defendants deny the allegations in paragraph 51.

6 52. Defendants deny the allegations in paragraph 52.

7 53. Defendants deny the allegations in paragraph 53.

8 54. Defendants deny the allegations in paragraph 54.

9 55. Defendants incorporate their responses to paragraphs 1 through 54
10 above.

11 56. Defendants admit the allegations in paragraph 56.

12 57. Defendants deny the allegations in paragraph 57.

13 58. Defendants deny the allegations in paragraph 58.

14 59. Defendants deny the allegations in paragraph 59.

15 60. Defendants deny each and every allegation not expressly admitted or
16 otherwise addressed herein.

17 **AFFIRMATIVE DEFENSES**

18 The Defendants assert the following Affirmative Defenses.

- 19 1. To the extent Defendants violated any aspect of the FDCPA, it was a
20 result of a bona fide error, it was unintentional, and Defendants, at all
21 relevant times, maintained procedures reasonably adapted to avoid the
22 errors alleged in the Complaint.
- 23 2. Plaintiff's Complaint fails to state a claim upon which relief can be
24 granted.
- 25 3. Plaintiff's Complaint is barred by the applicable statute(s) of limitations.
- 26 4. Plaintiff suffered no damage
- 27 5. Plaintiff failed to mitigate her alleged damage.
- 28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

6. Defendants reserve the right to seek leave to amend this Answer if they discover facts supporting any other defenses available under the Federal Rules of Civil Procedure.

WHEREFORE, having fully answered Plaintiff's Complaint, Defendants request that it be dismissed in its entirety, that Plaintiff recover\ nothing thereby, and that Defendants be awarded their taxable costs and any other relief deemed appropriate by the Court.

DATED this 2nd day of February, 2026.

JONES, SKELTON & HOCHULI, P.L.C.

By /s/ Robert R. Berk
Robert R. Berk
Luan Gurra
40 N. Central Avenue, Suite 2700
Phoenix, Arizona 85004
Attorneys for Defendants CHBD Law LLP
and Cruz

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of February, 2026, I caused the foregoing document to be filed electronically with the Clerk of Court through the CM/ECF System for filing; and served on counsel of record via the Court's CM/ECF system.

/s/ Kathy Kleinschmidt