UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,	§	
	§	
Plaintiff	§	
	§	CIVIL ACTION H-06-3788
versus	§	(Claim: 111922)
	§	
WINFORD P. AKER,	§	
	§	
Defendant	§	

Complaint

1. *Jurisdiction.* The district court has jurisdiction because the United States is a party. *See* U.S. CONST., art III, § 2, and 28 U.S.C. § 1345.

2. *Venue*. The defendant is a resident of Harris County, Texas, and may be served with process at , Houston, Texas 77063.

3. *The Debt*. The debt owed the United States as of the date of the Certificate of Indebtedness is:

A.	Current principal	$	1,222.43
B.	Interest (capitalized and accrued)	$	492.04
C.	Administrative fees, costs, penalties (Including $350.00 Filing fee)	$	350.00
D.	Attorney's fees	$	550.00
E.	Balance due	$	2,614.47

F. Prejudgment interest accrues at 8.00% per annum being $0.27 per day.

The current principal in paragraph 3 A is after credits of $815.31.

The certificate of indebtedness, attached as Exhibit A, shows the total owed excluding attorney's fees and central intake facility charges. On the date of the certificate the principal and interest shown were correct after credits having been applied.

4. *Failure to pay*. Demand has been made on the defendant to pay the indebtedness, and the defendant has failed to pay it.

5. *Prayer*. The United States prays for judgment for:

A. The sums in paragraph 3 plus pre-judgment interest through the date of judgment, administrative costs, and post-judgment interest.

B. Attorney's fees; and,

C. Other relief the court deems proper.

Respectfully submitted,

ALONSO, CERSONSKY & GARCÌA, P.C.

By: /s/ *M. H. Cersonsky*

M. H. Cersonsky
State Bar: 04048500
Jim L. García
State Bar: 07636700
5065 Westheimer, Suite 600
Houston, Texas 77056
Telephone: (713) 840-1492
Fax: (713) 840-0038

Attorneys for Plaintiff