



Absence of evidentiary value for layout- and style-formatted paper documents that cannot be direct printouts from original electronic bank files

Sam Han

Registered Patent Attorney, Department of Litigation, DeWoskin Law Firm, LLC, Decatur, Georgia, United States of America

Abstract

In 2016, Emmy Award winning host John Oliver reported on the debt-collection industry, in which he exposed fraud being committed on a massive scale. That same fraud-prevalent industry has been the subject of numerous investigations and penalties imposed by the Consumer Financial Protection Bureau ("CFPB"). Because the fraudulent behaviors of debt collectors have been exposed through lawsuits and reports from various media outlets, debt collectors now employ more sophisticated evidence-manufacturing techniques in pursuit of their collection efforts against consumers. Those techniques are so convincing that consumers face resistance from courts that routinely enter adverse judgments against the consumers based on the manufactured evidence. One major reason that the courts often overlook anomalies in manufactured printouts from electronic files is because the courts are unfamiliar with file formats and how those files must appear visually in the absence of any modification or intervention by human hands or computer algorithms. This paper describes the native file format required for banking documents and explains how irregularities can be identified from paper printouts without relying on metadata from the original electronic document.

Keywords: Evidence, digital, electronic, fraud, layout, style, format, paper, document, ASCII

Introduction

In 2016, Emmy Award winning host John Oliver^[1] reported on the debt-collection industry, in which he has exposed fraud being committed on a massive scale in that industry^[2]. That same fraud-rife industry has been the subject of numerous investigations and penalties imposed by the Consumer Financial Protection Bureau (hereinafter, "CFPB")^[3], whose parent agency is the United States Federal Reserve^[4].

Because the fraudulent behaviors of debt collectors have been exposed through lawsuits by the CFPB^[5] and through reports from various media outlets^[6], debt collectors now employ more sophisticated evidence-manufacturing techniques in pursuit of their debt-collection efforts against consumers^[7]. Those techniques are so convincing that alleged debtors face resistance from courts that routinely ignore the anomalies in the printed documents and enter judgment against the consumer based on printed documents that have unexplained irregularities^[8].

One major reason that courts often overlook irregularities in the alleged printouts from the electronic files is because courts are unfamiliar with digital file formats and how those files normally appear visually in the absence of any modification or intervention by human hands or computer algorithms. This paper attempts to: (a) clearly describe what is the native file format; (b) explain why that particular native file format is mandatory across the banking industry; (c) describe how that native file appears visually when there has been no intervention by human hands or modification by a computer; (d) identify actual irregular files that the courts have relied upon to enter judgment against the consumers; and (e) provide quotes from sworn testimony of the debt collectors themselves, which supports the conclusion that the paper printouts are layout- and style-formatted documents that are not direct printouts from the original electronic bank files. The novelty of this approach is that it

relies on traditional evidentiary rules without relying on the metadata from the electronic files.

For purposes of organization, this paper includes the following sections

(a) Section 2 cites to the United States Code ("U.S.C") and the Code of Federal Regulations ("C.F.R.") that sets forth the formatting requirements for United States ("U.S.") banking records;

(b) Section 3 explains particular aspects of the required file format that make the format visually distinguishable from other style- or layout-formatted documents;

(c) Section 4 shows examples of paper documents that were allegedly printed directly from electronic documents, all of which have been gathered from multiple different debt collectors that have used those documents in lawsuits against consumers, and all of which cannot be direct printouts from electronic banking files that are U.S.C.- or C.F.R.-compliant;

(d) Section 5 provides direct quotes from sworn testimony by debt collectors themselves, which confirm the actual file format of the original electronic bank files, as well as providing evidence that layout- or style-formatted printouts cannot be from those original electronic files; and

(e) Section 6 ends with concluding remarks.

Before continuing, the author wishes to clarify that this paper is applicable only to the legal system in the U.S., as the author is not a practitioner in any other foreign jurisdiction.

Also, documents from which enlarged portions were copied for the figures are available from publicly filed court documents (as demonstrated from the electronic court stamp on the documents). Because those documents were downloaded from public records (such as court proceedings), the publicly available documents were

FileName	LineNumber	open_dt	Product_Type	subpool_id	app_fico	fico_score_update
CHARGEOFF_SALE_SHER_20230410	796	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	797	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	798	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	799	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	800	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	801	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	802	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	803	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	804	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	805	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	806	08/26/2021	Unsecured loan	464	687	783
CHARGEOFF_SALE_SHER_20230410	807	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	808	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	809	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	810	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	811	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	812	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	813	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	814	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	815	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
CHARGEOFF_SALE_SHER_20230410	816	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

[24]

Clearly, the excerpt of the printout on the left looks nothing like the excerpt of the printout on the right. Just from visual inspection, one can readily determine that, unlike the excerpt on the left [25], the excerpt on the right: (a) clearly exhibits layout formatting with squarely aligned rows and columns; and also (b) clearly exhibits style formatting with headings in white text on a black background, but the entries in black text on a white background.

Similar formatting for style or layout is found in nearly every LVNV case against consumers, in which corresponding printed documents are filed as evidence of original documents from FDIC-insured banks. A non-exhaustive list of such cases by LVNV against consumers includes: LVNV Funding, LLC v. Tamika Brown, Case Number 24CV01441 (Municipal Court, Hamilton County, Ohio) (hereinafter, "Brown Case"); LVNV Funding, LLC v. Nancy Duvall, Case Number 23CV28211 (Municipal Court,

Hamilton County, Ohio) (hereinafter, "Duvall Case"); LVNV Funding, LLC v. Henry Flowers, Case Number 24CV21667 (Municipal Court, Hamilton County, Ohio) (hereinafter, "Flowers Case"); LVNV Funding, LLC v. Paul Loveless, Case Number 24CV17562 (Municipal Court, Hamilton County, Ohio) (hereinafter, "Loveless Case"); LVNV Funding, LLC v. Eileen Pike, Case Number 23CV28432 (Municipal Court, Hamilton County, Ohio) (hereinafter, "Pike Case"); LVNV Funding, LLC v. Damien Townsend, Case Number 23CV28432 (Municipal Court, Hamilton County, Ohio) (hereinafter, "Townsend Case"); and LVNV Funding, LLC v. Baron Wynter, Case Number 24CV21026 (Municipal Court, Hamilton County, Ohio) (hereinafter, "Wynter Case") (hereinafter, collectively, "LVNV Cases"). Excerpts of the printouts from the files (hereinafter, collectively, "Printed Files") are provided here

LineNumber	FirstName	LastName	CurrentBalanceOwing	ChargeOffAmount
2156	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2157	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2158	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2159	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2160	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2161	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2162	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2163	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2164	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2165	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2166	TAMIKA	BROWN	1862.9200	1862.92
2167	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2168	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2169	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2170	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2171	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2172	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2173	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2174	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2175	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2176	[Redacted]	[Redacted]	[Redacted]	[Redacted]

11th Line

[26]

LineNumber	CHNAME	BALANCE	Cur_Bal
1523	[Redacted]	[Redacted]	[Redacted]
1524	[Redacted]	[Redacted]	[Redacted]
1525	[Redacted]	[Redacted]	[Redacted]
1526	[Redacted]	[Redacted]	[Redacted]
1527	[Redacted]	[Redacted]	[Redacted]
1528	[Redacted]	[Redacted]	[Redacted]
1529	[Redacted]	[Redacted]	[Redacted]
1530	[Redacted]	[Redacted]	[Redacted]
1531	[Redacted]	[Redacted]	[Redacted]
1532	[Redacted]	[Redacted]	[Redacted]
1533	DUVALL, NANCY	\$1,450.92	1450.9200
1534	[Redacted]	[Redacted]	[Redacted]
1535	[Redacted]	[Redacted]	[Redacted]
1536	[Redacted]	[Redacted]	[Redacted]
1537	[Redacted]	[Redacted]	[Redacted]
1538	[Redacted]	[Redacted]	[Redacted]
1539	[Redacted]	[Redacted]	[Redacted]
1540	[Redacted]	[Redacted]	[Redacted]
1541	[Redacted]	[Redacted]	[Redacted]
1542	[Redacted]	[Redacted]	[Redacted]
1543	[Redacted]	[Redacted]	[Redacted]

11th Line

[27]

LineNumber	BrwrFirstName	BrwrLastName	PurchaseBalance	ChgOffBalance	PurchaseIntBal	ChgOffInt
230	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
231	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
232	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
233	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
234	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
235	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
236	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
237	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
238	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
239	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
240	HENRY	FLOWERS	1257.350	1257.35	77.650	77.65
241	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
242	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
243	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
244	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
245	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
246	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
247	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
248	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
249	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
250	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

11th Line

[28]

LineNumber	FirstName	LastName	CurrentBalanceOwing
3141	[Redacted]	[Redacted]	[Redacted]
3142	[Redacted]	[Redacted]	[Redacted]
3143	[Redacted]	[Redacted]	[Redacted]
3144	[Redacted]	[Redacted]	[Redacted]
3145	[Redacted]	[Redacted]	[Redacted]
3146	[Redacted]	[Redacted]	[Redacted]
3147	[Redacted]	[Redacted]	[Redacted]
3148	[Redacted]	[Redacted]	[Redacted]
3149	[Redacted]	[Redacted]	[Redacted]
3150	[Redacted]	[Redacted]	[Redacted]
3151	PAUL	LOVELESS	900.4200
3152	[Redacted]	[Redacted]	[Redacted]
3153	[Redacted]	[Redacted]	[Redacted]
3154	[Redacted]	[Redacted]	[Redacted]
3155	[Redacted]	[Redacted]	[Redacted]
3156	[Redacted]	[Redacted]	[Redacted]
3157	[Redacted]	[Redacted]	[Redacted]
3158	[Redacted]	[Redacted]	[Redacted]
3159	[Redacted]	[Redacted]	[Redacted]
3160	[Redacted]	[Redacted]	[Redacted]
3161	[Redacted]	[Redacted]	[Redacted]

11th Line

[29]

LineNumber	first_name	last_name
341	[Redacted]	[Redacted]
342	[Redacted]	[Redacted]
343	[Redacted]	[Redacted]
344	[Redacted]	[Redacted]
345	[Redacted]	[Redacted]
346	[Redacted]	[Redacted]
347	[Redacted]	[Redacted]
348	[Redacted]	[Redacted]
349	[Redacted]	[Redacted]
350	[Redacted]	[Redacted]
351	Eileen	Pike
352	[Redacted]	[Redacted]
353	[Redacted]	[Redacted]
354	[Redacted]	[Redacted]
355	[Redacted]	[Redacted]
356	[Redacted]	[Redacted]
357	[Redacted]	[Redacted]
358	[Redacted]	[Redacted]
359	[Redacted]	[Redacted]
360	[Redacted]	[Redacted]
361	[Redacted]	[Redacted]

11th Line

[30]

LineNumber	CHNAME	COAMOUNT	Cur_Bal
1960	[Redacted]	[Redacted]	[Redacted]
1961	[Redacted]	[Redacted]	[Redacted]
1962	[Redacted]	[Redacted]	[Redacted]
1963	[Redacted]	[Redacted]	[Redacted]
1964	[Redacted]	[Redacted]	[Redacted]
1965	[Redacted]	[Redacted]	[Redacted]
1966	[Redacted]	[Redacted]	[Redacted]
1967	[Redacted]	[Redacted]	[Redacted]
1968	[Redacted]	[Redacted]	[Redacted]
1969	[Redacted]	[Redacted]	[Redacted]
1970	TOWNSEND,DAMIEN	\$1,333.10	1333.1000
1971	[Redacted]	[Redacted]	[Redacted]
1972	[Redacted]	[Redacted]	[Redacted]
1973	[Redacted]	[Redacted]	[Redacted]
1974	[Redacted]	[Redacted]	[Redacted]
1975	[Redacted]	[Redacted]	[Redacted]
1976	[Redacted]	[Redacted]	[Redacted]
1977	[Redacted]	[Redacted]	[Redacted]
1978	[Redacted]	[Redacted]	[Redacted]
1979	[Redacted]	[Redacted]	[Redacted]
1980	[Redacted]	[Redacted]	[Redacted]

11th Line

[31]

LineNumber	CHNAME	HIGHBALANCE	COAMOUNT	Cur_Bal	LastPurchaseAmount
26309	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26310	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26311	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26312	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26313	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26314	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26315	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26316	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26317	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26318	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26319	WYNTER,BARON	\$637.67	\$637.67	637.6700	58.3700
26320	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26321	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26322	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26323	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26324	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26325	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26326	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26327	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26328	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
26329	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]

11th Line

[32]

Uniformly and without exception, all of these Printed Files clearly exhibit: (a) layout formatting; or (b) style formatting; or (c) both layout and style formatting. The presence of such formatting demonstrates that the Printed Files cannot be direct printouts from C.F.R.-compliant ASCII files.

The irregularities in the Printed Files lead to the conclusion that the Printed Files have been altered or modified prior to being printed on paper. Additional support for document tampering is provided in the following Section 5 of this paper.

Testimony From Debt Collectors Confirming Irregularities

From an observational standpoint, the formatting in style or layout (or both) should be sufficient to conclude with a reasonable degree of certainty that there has been some type of intervention or manipulation of the original electronic ASCII files prior to printing (rather than the Printed Files being directly printed to paper from original electronic ASCII files). The conclusion that the documents were manipulated to appear with layout or style formatting is confirmed by sworn testimony from LVNV's corporate representative. Specifically, the corporate representative for LVNV confirmed that: (a) the original files from the banks are text files (meaning, ASCII files with no style or layout formatting); and (b) the original ASCII files are not reformatted for appearance or ease-of-use^[33]. Verbatim testimony from LVNV includes

Q: And then so explain how that text file is presented.

A: The text file shows the information and it is separated by commas.

Q: Okay. So is it in lines or is it just this big, massive document?

A: You and I might have different explanations or descriptions of a big, massive document. But just like any text file, it is text that -- it's a little harder for humans to view, works great for computer systems. But it is a text file that shows the information for each account. And the fields are separated by commas^[34].

In other words, due to the file lacking any style or layout formatting, the alleged original electronic file is "harder for humans to view^[35]." Because of this, LVNV further testified that if LVNV wanted to lie, then LVNV would have taken that hard-for-humans-to-view text file and manipulated it to "make it look nice and pretty^[36]." Again, the verbatim testimony was

A: The easiest thing we could do if we wanted to lie was to make it look nice and pretty, but we do not. It is exactly how each seller prepares their file and they send it to us. And we do not alter their data or change their data even if formatting would make it look a whole lot better^[37].

In other words, LVNV's sworn testimony is that not even the formatting is altered from "how each seller prepares their file" (namely, in ASCII text). Consequently, LVNV's sworn testimony reinforces the fact that the style-and-layout formatted Printed Files (as shown in Section 4) are manufactured documents (and not original ASCII-formatted electronic files, certainly not files that comply with the formatting requirements for banking institutions under the C.F.R.).

Conclusion

As demonstrated in this paper, in many debt-collection cases against consumers, paper documents that are allegedly printed directly from electronic banking records are used against consumers with neither the consumers nor the courts being aware that the paper documents are problematic. However, if one understands the specific electronic format requirements that are imposed by law on banks, in conjunction with how those electronic file formats should appear when directly printed to paper, then one can detect whether certain paper documents are direct printouts of the original electronic file or whether there has been some intervention or modification of those original electronic files prior to being printed on paper.

As demonstrated herein, a relatively straightforward observation and analysis can reliably detect irregularities in paper printouts that demonstrated manufactured electronic evidence when one understands *a priori* how original (and un-modified) electronic documents must be formatted. This is because computer systems always behave in a reliable fashion, meaning, unformatted ASCII files cannot *sua sponte* appear as layout- or style-formatted printouts when there has been no human or computer intervention to alter the ASCII file.

At its core, the approach described herein can be implemented independently or as a redundancy (in conjunction with metadata analysis of the original electronic file). By providing easily understandable information about ASCII files and how they should appear when directly printed to paper, both consumers and courts have the ability to detect fraudulent behavior by unscrupulous debt collectors without the need to expend exorbitant resources to examine metadata associated with electronic files.

References

1. See, <https://www.televisionacademy.com/awards/nominees-winners/2016/outstanding-writing-for-a-variety-series>; https://en.wikipedia.org/wiki/List_of_awards_and_nominations_received_by_John_Oliver.
2. Debt Buyers: Last Week with John Oliver, available at <https://www.youtube.com/watch?v=hxUANtt1z2c>, posted on 2016-Jun-06.
3. See, e.g., Consumer Financial Protection Bureau Sues Debt Collectors and Debt Buyers Encore Capital Group, Midland Funding, Midland Credit Management, and Asset Acceptance Capital Corp., dated, 2020 <https://www.consumerfinance.gov/about-us/newsroom/cfpb-sues-debt-collectors-and-debt-buyers-encore-capital-group-et-al/>.
4. Federal Register, Consumer Financial Protection Bureau, <https://www.federalregister.gov/agencies/consumer-financial-protection-bureau> (maintained by the National Archives, last downloaded 2025-Oct-30).
5. See, Enforcement Actions, <https://www.consumerfinance.gov/enforcement/actions/> (regularly updated); see, also, <https://www.consumerfinance.gov/about-us/newsroom/cfpb-sues-debt-relief-companies-illegally-posing-federal-government/>; <https://www.consumerfinance.gov/about-us/newsroom/consumer-financial-protection-bureau-settles-debt-collector-engaging-deceptive-debt-collection-practices-three-states/>; <https://www.consumerfinance.gov/about-us/newsroom/consumer-financial-protection-bureau-sues-debt-collector-bounceback-inc/>.
6. See, e.g., Payback for a Debt Collector: Illegal, Aggressive Tactics Result in Jail Time, FBI News, <https://www.fbi.gov/news/stories/illegal-tactics-result-in-jail-time-for-debt-collector> (posted 2017-Jan-13); Key figure in abusive debt collections sentenced to prison: 'Your conduct was motivated by greed,' The Buffalow News, https://buffalonews.com/news/local/crime-courts/article_37e05288-bda9-11ef-9cf0-238cdd4f41b8.html (posted 2024-Dec-30); AG

- Brnovich Obtains Judgment Permanently Banning Debt Collector & Awarding More Than \$1.6 Million in Restitution, Arizona Attorney General News, <https://www.azag.gov/press-release/ag-brnovich-obtains-judgment-permanently-banning-debt-collector-awarding-more-16> (posted 2022-May-13); A California debt collector has sued thousands of people - some of them never knew, KPBS News, <https://www.kpbs.org/news/local/2023/04/06/a-california-debt-collector-has-sued-thousands-of-people-some-of-them-never-knew> (published 2023-Apr-06); Fraud Charges Filed Against Alleged Scammer Seen on 'Nightline,' ABC News, <https://abcnews.go.com/Blotter/fraud-charges-filed-alleged-scammer-nightline/story?id=17069702> (published 2012-Aug-23).
7. Han, Sam. "Manufactured Evidence in Debt-Collection Cases." Zenodo, November 17, 2015. <https://doi.org/10.5281/zenodo.17486296>; Han, Sam. "Manufactured Evidence." Zenodo, April 12, 2024. <https://doi.org/10.5281/zenodo.17486148>.
 8. See, e.g., Judgment Entry, 2025-Jul-09, Absolute Resolutions Investments, LLC v. Justin C. Marshall, Case Number A2403270 (Court of Common Pleas, Hamilton County, Ohio); Final Appealable Order, 2025-Jul-28, LVNV Funding, LLC v. Dave Salmon, Case Number CV 2024 04 0735 (Court of Common Pleas, Butler County, Ohio).
 9. See, Information for Data Management Plans, Astrobiology Habitable Environments Database (AHED), available at <https://ahed.nasa.gov/help/help-data-management-plan> (recommending use of Zenodo and providing Universal Resource Locator (URL) link for Zenodo).
 10. 31 U.S.C. § 5101 ("Decimal System"), available at <https://uscode.house.gov/view.xhtml?path=/prelim@title31/subtitle4/chapter51/subchapter1&edition=prelim>.
 11. See, Half cent, Wikipedia, [https://en.wikipedia.org/wiki/Half_cent_\(United_States_coin\)](https://en.wikipedia.org/wiki/Half_cent_(United_States_coin))
 12. See, Coinage Act of 1792, Wikipedia, https://en.wikipedia.org/wiki/Coinage_Act_of_1792 ("Current statutes regulating coinage in the United States may be found in Title 31 of the United States Code").
 13. 12 C.F.R. § 360.9(d)(1) ("Such standard data files are to be created through a mapping of pre-existing data elements and internal institution codes into standard data formats"), available at National Archives. "12 C.F.R. 360, with Appendices A Through G." Zenodo, 2025. <https://doi.org/10.5281/zenodo.17515489>.
 14. App. A to 12 C.F.R. § 360 ("The file will be in a tab- or pipe-delimited ASCII format").
 15. See, 12 C.F.R. § 360.
 16. Misplaced decimal point: Woman owed \$400, not \$40,000, company says, The Oregonian, published, 2016, https://www.oregonlive.com/portland/2016/05/misplaced_decimal_point_bankru.html.
 17. See, ASCII, Wikipedia, <https://en.wikipedia.org/wiki/ASCII>; American National Standards Institute (ANSI) Standard for Coded Character Sets - 7-Bit American National Standard Code for Information Interchange (7-Bit ASCII), 1986 (hereinafter, "7-Bit ASCII").
 18. See, ASCII, Wikipedia, <https://en.wikipedia.org/wiki/ASCII> ("Except for the control characters that prescribe elementary line-oriented formatting, ASCII does not define any mechanism for describing the structure or appearance of text within a document. Other schemes, such as markup languages, address page and document layout and formatting" (emphasis supplied)); see, also, 7-Bit ASCII.
 19. See, https://fastpayments.worldbank.org/sites/default/files/2022-03/Messaging%20Standards_Final.pdf (published by the World Bank).
 20. Analyses of problematic printouts that have been used against consumers in court can be found in the case files themselves, e.g., Han, "Expert Reports." Zenodo, 2023–2025. <https://doi.org/10.5281/zenodo.17536398>.
 21. Case Number 24CV000841 (Court of Common Pleas, Franklin County, Ohio, U.S.A.).
 22. See, Franklin County Court of Common Pleas, Ohio, U.S.A. "Affidavit of Marlette Servicing with Exhibit B, Dated 2024-Dec-10, Filed in LVNV Funding, LLC V. Wiseman, Case Number 24CV000841 (Franklin County Court of Common Pleas)." Zenodo, December 10, 2024. <https://doi.org/10.5281/zenodo.17536621>; see, also, See, Franklin County Court of Common Pleas, Ohio, U.S.A. "Plaintiff's Notice of Filing Exhibits in Support of Motion for Summary Judgment as to Complaint and Counterclaim, Filed 2025-Mar-17 in LVNV Funding, LLC V. Wiseman, Case Number 24CV000841 (Franklin County Court of Common Pleas)." Zenodo, March 17, 2025. <https://doi.org/10.5281/zenodo.17536670>.
 23. The complete file from which the left excerpt was taken is available at <https://doi.org/10.5281/zenodo.17536621>.
 24. The complete file from which the right excerpt was taken is available at <https://doi.org/10.5281/zenodo.17536670>.
 25. Although the left excerpt is also problematic, for purposes of this paper, the authors focus on the more-clearly identifiable layout-formatted and style-formatted excerpt on the right.
 26. Municipal Court of Hamilton County, Ohio, U.S.A. "Redacted Exhibit Filed on 2024-Mar-11 in LVNV Funding, LLC v. Tamika Brown, Case Number 24CV01441 (Municipal Court, Hamilton County, Ohio)." Zenodo, March 11, 2024. <https://doi.org/10.5281/zenodo.17516637> (hereinafter, "Brown File").
 27. Municipal Court of Hamilton County, Ohio, U.S.A. "Redacted Exhibit Filed on 2024-Feb-20 in LVNV Funding, LLC v. Nancy Duvall, Case Number 23CV28211 (Municipal Court, Hamilton County, Ohio)." Zenodo, February 20, 2024. <https://doi.org/10.5281/zenodo.17516695> (hereinafter, "Duvall File").
 28. Municipal Court of Hamilton County, Ohio, U.S.A. "Redacted Exhibit Filed on 2024-Aug-06 in LVNV Funding, LLC v. Henry Flowers, Case Number 24CV21667 (Municipal Court, Hamilton County, Ohio)." Zenodo, August 6, 2024. <https://doi.org/10.5281/zenodo.17516752> (hereinafter, "Flowers File").

29. Municipal Court of Hamilton County, Ohio, U.S.A. "Redacted Exhibit Filed on 2024-Jun-27 in LVNV Funding, LLC v. Paul Loveless, Case Number 24CV17562 (Municipal Court, Hamilton County, Ohio)." Zenodo, June 27, 2024. <https://doi.org/10.5281/zenodo.17516772> (hereinafter, "Loveless File").
30. Municipal Court of Hamilton County, Ohio, U.S.A. "Redacted Exhibit Filed on 2024-Feb-20 in LVNV Funding, LLC v. Eileen Pike, Case Number 23CV28432 (Municipal Court, Hamilton County, Ohio)." Zenodo, February 20, 2024. <https://doi.org/10.5281/zenodo.17516790> (hereinafter, "Pike File").
31. Municipal Court of Hamilton County, Ohio, U.S.A. "Redacted Exhibit Filed on 2024-Feb-23 in LVNV Funding, LLC v. Damien Townsend, Case Number 23CV28432 (Municipal Court, Hamilton County, Ohio)." Zenodo, February 23, 2024. <https://doi.org/10.5281/zenodo.17516846> (hereinafter, "Townsend File").
32. Municipal Court of Hamilton County, Ohio, U.S.A. "Redacted Exhibit Filed on 2024-Jul-31 in LVNV Funding, LLC v. Baron Wynter, Case Number 24CV21026 (Municipal Court, Hamilton County, Ohio)." Zenodo, July 31, 2024. <https://doi.org/10.5281/zenodo.17516899> (hereinafter, "Wynter File").
33. Hamilton County Court of Common Pleas, Ohio, U.S.A. "Exhibit C to Defendant's First Notice of Filing Exhibits from Daubert Hearing, Filed 2025-Sep-05, LVNV Funding, LLC, v. Joseph Mulholland, Case Number A2401661 (Court of Common Pleas, Hamilton County, Ohio) (Exhibit Highlighting Excerpts from Ohio Civ. R. 30(B)(5) Deposition of LVNV Representative Tonya Henderson)." Zenodo, September 5, 2025. <https://doi.org/10.5281/zenodo.17517313>.
34. Hamilton County Court of Common Pleas, Ohio, U.S.A. "Exhibit C to Defendant's First Notice of Filing Exhibits from Daubert Hearing, Filed 2025-Sep-05, LVNV Funding, LLC, v. Joseph Mulholland, Case Number A2401661 (Court of Common Pleas, Hamilton County, Ohio) (Exhibit Highlighting Excerpts from Ohio Civ. R. 30(B)(5) Deposition of LVNV Representative Tonya Henderson)." Zenodo, September 5, 2025. <https://doi.org/10.5281/zenodo.17517313>.
35. Hamilton County Court of Common Pleas, Ohio, U.S.A. "Exhibit C to Defendant's First Notice of Filing Exhibits from Daubert Hearing, Filed 2025-Sep-05, LVNV Funding, LLC, v. Joseph Mulholland, Case Number A2401661 (Court of Common Pleas, Hamilton County, Ohio) (Exhibit Highlighting Excerpts from Ohio Civ. R. 30(B)(5) Deposition of LVNV Representative Tonya Henderson)." Zenodo, September 5, 2025. <https://doi.org/10.5281/zenodo.17517313>.
36. Hamilton County Court of Common Pleas, Ohio, U.S.A. "Exhibit C to Defendant's First Notice of Filing Exhibits from Daubert Hearing, Filed, LVNV Funding, LLC, v. Joseph Mulholland, Case Number A2401661 (Court of Common Pleas, Hamilton County, Ohio) (Exhibit Highlighting Excerpts from Ohio Civ. R., 2025, 30(5). Deposition of LVNV Representative Tonya Henderson)." Zenodo, September 5, 2025. <https://doi.org/10.5281/zenodo.17517313>.
37. Hamilton County Court of Common Pleas, Ohio, U.S.A. "Exhibit C to Defendant's First Notice of Filing Exhibits from Daubert Hearing, Filed-Sep-05, LVNV Funding, LLC, v. Joseph Mulholland, Case Number A2401661 (Court of Common Pleas, Hamilton County, Ohio) (Exhibit Highlighting Excerpts from Ohio Civ. R., 2025, 3(5). Deposition of LVNV Representative Tonya Henderson)." Zenodo, September 5, 2025. <https://doi.org/10.5281/zenodo.17517313>.