

FILED

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the
Western District of TexasAUG 03 2026
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY CM
DEPUTY CLERK

Terrale Yarbrough

Case No.

EP26CV2048

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Bank Of America

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Terrale Yarbrough
Street Address	306 W. DAMPIER ST. Inverness, FL 34450
City and County	Inverness, Citrus County
State and Zip Code	FL 34450
Telephone Number	509-953-7074
E-mail Address	Yarbroughterrale@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name Bank Of AmericaJob or Title *(if known)* _____Street Address P.O. BOX 982238City and County El Paso, El Paso CiuntyState and Zip Code Texas 79998Telephone Number (800) 421-2110E-mail Address *(if known)* _____

Defendant No. 2

Name _____

Job or Title *(if known)* _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

E-mail Address *(if known)* _____

Defendant No. 3

Name _____

Job or Title *(if known)* _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

E-mail Address *(if known)* _____

Defendant No. 4

Name _____

Job or Title *(if known)* _____

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

E-mail Address *(if known)* _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

ARTICLE 1 SECTION 10 : RIGHT TO CONTRACT

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Terrale Yarbrough, is a citizen of the State of *(name)* Florida.

b. If the plaintiff is a corporation

The plaintiff, *(name)*, is incorporated under the laws of the State of *(name)* and has its principal place of business in the State of *(name)*.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)*, is a citizen of the State of *(name)*. Or is a citizen of *(foreign nation)*.

b. If the defendant is a corporation

The defendant, (name) Bank Of America, is incorporated under the laws of the State of (name) Texas, and has its principal place of business in the State of (name) Texas.
 Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):
\$1,000,000.00 AMOUNT OWED FOR VIOLATION OF TRUST SECURITY AGREEMENT

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I SENT THE NOTICE OF UNPAID LIEN TO THE COMPANY (WHICH I WILL ATTACH TO THIS CASE), LETTING THEM KNOW ABOUT THE FIRST OBLIGATION TRUST LIEN THAT I NEEDED TO GET TAKEN CARE (WHICH HAD NOTHING TO DO WITH THEM). THEY COMPLETELY IGNORED THE NOTICE AND CONTINUED TO REPORT ACCOUNT ON CREDIT WHICH NOW PUTS THEM AT FAULT FOR THE TRUST LIEN SECURITY AGREEMENT PAY OFF FOR DELAYING AND IGNORING THE FIRST OBLIGATION PAY OFF.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

\$1,000,000.00 AMOUNT OWED FOR TRUST SECURITY AGREEMENT VIOLATION

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: July 6th 2026

Signature of Plaintiff

Printed Name of Plaintiff

Terrale Yarbrough

B. For Attorneys

Date of signing: July 6th 2026

Signature of Attorney

Terrale Yarbrough

Printed Name of Attorney

Terrale Yarbrough

Bar Number

Name of Law Firm

Street Address

306 W. DAMPIER ST. Inverness, FL 34450

State and Zip Code

FL 34450

Telephone Number

509-953-7074

E-mail Address

Yarbroughterrale@gmail.com

Name: Terrale Yarbrough

(Trustee)

Address: 306 W. DAMPIER ST. Inverness, FL 34450

Lien Holder: Bank Of America

Lien Holder Address: P.O. Box 982238 El Paso, Texas 79448

JULY 6TH 2026

Notice of Lien

I Terrale Yarbrough (Trustee) of Terrale Yarbrough **Revocable Living Trust** send you **Lien Holder**, a notice letting you know there is a lien on Terrale Yarbrough Assets which includes the following:

Bank Of America

NO ASSETS OR MONEY Can be Recouped Until The lien of **\$1,000,000.00** is PAID IN FULL to The Terrale Yarbrough **Revocable Living Trust**.

If You Violate this notice by NO RESPONSE, CONTINUE TO REPORT the Listed Assets or even Send a Letter stating you will CONTINUE TO REPORT the Listed asset or assets on Terrale Yarbrough **Credit report to credit bureaus** after being notified with this notice, you now opt in to paying Terrale Yarbrough **Revocable Living Trust**

\$1,000,000.00 LIEN PAY OFF AMOUNT TO SETTLE
VIOLATION WITH ASSET REPORTED AS PAID OFF ON CREDIT mailed to
306 W. DAMPIER ST. Inverness, FI 34450.
FOR THE RECORD: Terrale Yarbrough **OPTS OUT OF ANY AND EVERY**
3RD PARTY RIGHTS Lien Holder CONTRACT OR IN BUSINESS WITH

Thanks, Terrale Yarbrough

(Trustee)