

FILED
CIVIL INTAKE

VIRGINIA:

2012 JUN 14 AM 10:32
IN THE CIRCUIT COURT OF FAIRFAX COUNTY

DIRECT CONNECT, LLC,

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

Plaintiff,

v.

Case No.

2012-08854

DEBRA SACHS

Serve: 2457 Stoney Creek Rd.
Frederick, MD 21707

and

INKTHIS, LLC,

Serve: Debra Sachs, R/A
2457 Stoney Creek Rd.
Frederick, MD 21707

Defendants.

COMPLAINT

COMES NOW the Plaintiff, by counsel, and for its Complaint against the Plaintiff states as follows:

1. Plaintiff, Direct Connect, LLC ("Direct Connect") is a Virginia limited liability company located in Fairfax County.
2. Defendant Debra Sachs ("Sachs") is an adult resident of Frederick, Maryland.
3. Defendant Inkthis, LLC, ("Inkthis") is a Maryland limited liability company in Frederick, Maryland.
4. Sachs is the owner and principal of Inkthis.
5. Inkthis had a contract with the Plaintiff for the Plaintiff to provide credit card processing services. Ms. Sachs apparently became frustrated with Direct Connect and posted things on Facebook to vent her frustrations.



6. Specifically, on June 5, 2012, Inkthis wrote on its wall, presumably by Sachs, "any retailers using Direct Connect as a merchant processor watch your account they are a bunch of thieves!" (See Exhibit 1 attached).
7. On her personal Facebook wall, Sachs referred to employees of Direct Connect as inept and called the company "horrible" on multiple occasions (See Exhibit 2 attached).
8. In addition, on her Facebook wall, she states that she has talked several other clients of Direct Connect into ceasing to do business with the Plaintiff and that she is "spreading the word."
9. One of the posts on Sach's page was also repeated on the Facebook page for Frederick County Bank.
10. All of the above referenced posts were made by the Defendants willfully, intentionally, and with reckless disregard for Plaintiff's rights.

COUNT I – DEFAMATION

11. Paragraphs 1-10 are incorporated herein by reference.
12. By making statements on various Facebook pages, Defendants have published their statements.
13. The statements made by the Defendants on Facebook are false.
14. Defendants knew at the time of making the Facebook postings that the statements were false.
15. By calling the Plaintiff "horrible," "inept" and "thieves," the Defendants made statements which would harm the Plaintiff's reputation.

WHEREFORE, Plaintiff asks for judgment against the Defendants in the amount of one million dollars, punitive damages of five million dollars, pre and post judgment interest, costs, and such further relief as the Court deems appropriate.

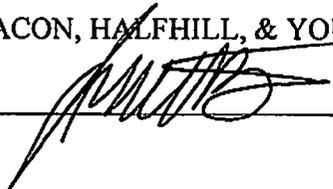
COUNT II – TORTIOUS INTERFERENCE WITH CONTRACTS (SACHS)

16. Paragraphs 1-15 are incorporated herein by reference.
17. According to Sach's Facebook posts, she is spreading the word to Direct Connect's customers to get them to leave Direct Connect. According to her, two customers were already gone.
18. These customers of Direct Connect have contractual relationships with Direct Connect.
19. Plaintiff knows that these customers have contractual relationships, which is why she is specifically targeting them to leave Direct Connect.
20. According to Sachs' own posts, she is intentionally trying to make Direct Connect's customers leave, constituting intentional interference.
21. Direct Connect has been damaged by Sachs' actions.

WHEREFORE, Plaintiff asks for judgment against the Defendants in the amount of one million dollars, punitive damages of five million dollars, pre and post judgment interest, costs, and such further relief as the Court deems appropriate.

Respectfully submitted,
DIRECT CONNECT, LLC
By counsel

ALLRED, BACON, HALFHILL, & YOUNG, P.C.

By:  _____

James T. Bacon, Esq. (VSB# 22146)
11350 Random Hills Rd.
Suite 700
Fairfax, VA 22030
703-352-1300
703-352-1301 (Fax)



inkthis

243 likes - 1 talking about this

✓ Liked



- Shopping/Retail
- Frederick, MD 21701
- 1 (301) 662-0603



243

About

Photos

Likes

Highlights ▾

Post Photo / Video

Write something...

inkthis
June 5

any retailers using Direct Connect as a merchant processor watch your account they are a bunch of thieves !

Like · Comment · Share

Direct Connect Your Slender and Attacks will be sponsored

Recent Posts by Others on inkthis

See All



Nina Baum

@ its going to be a rough bugs life at home

1 · April 21 at 2:34pm



Nina Baum

@ bug will miss fetch and play time at the store...

April 21 at 2:33pm



Nina Baum

Hope inkthis had a good last day! the dogs will miss t...

1 · April 21 at 2:26pm

More Posts ▾

 **Debbie Pink Sachs**

← Archived Messages

* Actions ▾

Search This Conversation



Debbie Pink Sachs

June 8

I'm not having any more problems- I cancelled service and the bank is so sick of my having to chase Direct Connect for my \$\$ you should not have debited that they have blocked your access to my account (I owe you nothing)...over 2 years worth of double talking bad service what the salesperson told me was not the way anything ever happened. I had to chase fees that were deducted from my bank account- then had to be credited , then checks sent for other credits . i'm not going to be specific because you can hear all the double talk from Julie in customer service --she's inept at her job, and my salesperson (you can look up who he is) a smooth talking "tell the client anything to quiet her" inept human. Things i was told you had approved i was charged for and had to chase for credit , the company is horrible.This is a quote cut and paste from an e-mail i received on Monday " I will submit a request for refund. 500 of our merchants that is canceled for any reason in the last six months or charge this. So please don't think that you were targeted. I will confirm request went through by the end of the day." why would i think i was targeted ? I had to track him down at 5:41pm and by then he changed the answer and it was my fault but because " i'm a nice person and i like you" he could waive the fee --double talking again ? Long story short i would be embarrassed to admit I was CEO of this company, in my opinion this is a very poorly run company that up until your contact with me, a pissed off past customer, has offered horrible customer service.



Debbie Pink Sachs

Yesterday

Was chatting with a close friend who owns a restaurant in Montgomery County and does not bank with FCB, I was telling him my opinions about how horrible Direct Connect is .He has had very similar problems with them (larger amounts of money= larger business) he thought he was the only one!. He will cease business with them by COB today . Direct Connect is HORRIBLE



Debbie Pink Sachs

Yesterday

2 customers gone nowmany more to go, I'm spreading the word



Debbie Pink Sachs

5 hours ago

took less than 24 hours and i have found another disgruntled customer. You should fix ALL the problems before you keep pushing an inferior product down the throat of the business public. So that's one customer gone, one who will be moved to their new merchant processor by COB Wednesday , and one who

