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CLERK OF SUPERIOR COURT
GWINNETT COUNTY, GEORGIA
26-A-09636-9
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TIANA P. GARNER, CLERK

IN THE SUPERIOR COURT OF GWINNETT COUNTY
STATE OF GEORGIA

STATE OF GEORGIA, *ex rel.* CHRISTOPHER M. CARR, ATTORNEY GENERAL OF THE STATE OF GEORGIA,	)	
PLAINTIFF,	)	
v.	)	**CIVIL ACTION FILE NO.** 26-A-09636-9
IBA SOLUTIONS LLC, IBA SOLUTIONS SECOND CHANCE CORPORATION, CARLINA PRIDGEN, Individually, and ANTHONY PRIDGEN, Individually,	)	
DEFENDANTS.	)	

VERIFIED COMPLAINT FOR DECLARATORY RELIEF, PRELIMINARY AND PERMANENT INJUNCTIVE RELIEF, CIVIL PENALTIES, DISGORGEMENT, AND OTHER EQUITABLE RELIEF

COMES NOW Plaintiff, Christopher M. Carr, Attorney General of the State of Georgia ("Attorney General"), and files this Verified Complaint against IBA Solutions LLC ("IBA Solutions"), IBA Solutions Second Chance Corporation ("IBA Second Chance"), Carlina Pridgen, individually, and Anthony Pridgen, individually (together, "Defendants"), and alleges the following:

INTRODUCTION

1. Defendants advertise, offer, sell, and conduct credit repair services in the State of Georgia for consumers throughout the nation, including consumers in Georgia. Operating a credit repair services organization is illegal in the State of Georgia pursuant to O.C.G.A. § 16-9-59.

2. Defendants advertise their services primarily on social media, through unsolicited telephone calls and emails, and on websites.

3. In advertising, offering, and selling their services, Defendants promise to help consumers with criminal records, prior bankruptcies, prior evictions, debts on other properties, and low credit scores easily obtain loans and rental housing. Defendants' services purportedly can wipe a consumer's slate clean.

4. Defendants' services, however, attempt to achieve the promised results by facilitating identity theft and fraud on a massive scale. Among other things, their scheme uses counterfeit Social Security numbers, false identities, counterfeit credit profiles maintained by consumer reporting agencies, and falsified documents including, but not limited to, counterfeit Social Security cards, federal tax filings, bank statements, and paystubs for jobs the consumers do not have. Defendants either manufacture the information and documents themselves or obtain them from third parties.

5. The Attorney General brings this action to enjoin Defendants from advertising, offering, selling, and engaging in illegal credit repair services.

6. The Attorney General further brings this action to enjoin Defendants from creating, obtaining, advertising, offering, selling, providing, or using, and from assisting consumers in creating, obtaining, or using, bogus Social Security numbers, false credit profiles and identities, and fabricated documents.

7. Moreover, the Attorney General brings this action to enjoin Defendants from advertising, offering, and selling services that constitute the unauthorized practice of law and from soliciting and accepting charitable donations without complying with O.C.G.A. § 43-17-5.

NATURE OF THE ACTION

8. The Attorney General files this Verified Complaint pursuant to the Georgia Fair Business Practices Act ("FBPA"), O.C.G.A. §§ 10-1-390–10-1-408. The purpose of the FBPA is to protect consumers and legitimate business enterprises from "unfair or deceptive practices in the conduct of any trade or commerce in part or wholly in the state." O.C.G.A. § 10-1-391(a).

9. Defendants' unfair and deceptive acts and practices constitute "consumer acts or practices" and "consumer transactions" as those terms are defined in O.C.G.A. § 10-1-392(a)(7) and (a)(10), respectively.

10. Pursuant to O.C.G.A. § 10-1-397(b), the Attorney General may take action to enforce the FBPA whether or not any person has actually been misled.

11. The Attorney General seeks remedies available under O.C.G.A. § 10-1-397(b)(2), including, but not limited to, preliminary and permanent injunctive relief, civil penalties, and other just and equitable relief, including disgorgement.

12. Pursuant to O.C.G.A. § 10-1-403, the Attorney General investigated Defendants' acts and practices that appeared to be unlawful under the FBPA. Pursuant to O.C.G.A. § 10-1-397(c), the Attorney General provided notice in writing on August 28, 2026, that these proceedings were contemplated. Defendants were given an opportunity to appear before the Attorney General and to propose a resolution acceptable to the Attorney General. Defendants, however, did not propose a resolution acceptable to the Attorney General.

PARTIES

PLAINTIFF

13. Plaintiff, the State of Georgia, *ex rel*. Christopher M. Carr, Attorney General of the State of Georgia, brings this action against the above-named defendants in his official capacity pursuant to O.C.G.A. § 10-1-397.

14. The Attorney General has determined that bringing this action is in the public interest, as it involves Georgia Defendants' pattern of unfair and deceptive acts and practices having affected and currently affecting legitimate business enterprises and consumers.

DEFENDANTS

15. **IBA Solutions.** Defendant IBA Solutions is a Georgia domestic limited liability company with its principal place of business in Gwinnett County, Georgia.

16. IBA Solutions is a credit repair services organization as defined in O.C.G.A. § 16-9-59(a)(2).

17. According to IBA Solutions's records submitted to the Georgia Secretary of State, IBA Solutions's registered agent is Carlina Pridgen and its registered office address is 1755 N. Brown Road, Suite 200, Lawrenceville, Georgia 30043.

18. IBA Solutions is not a law firm and does not employ attorneys licensed in Georgia.

19. IBA Solutions is not recognized by the U.S. Department of Justice ("DOJ") as an eligible organization to provide immigration representation through accredited representatives pursuant to 8 C.F.R. §§ 292.2 and 1292.11.

20. IBA Solutions's website is https://ibasolution.com/. IBA Solutions advertises on Instagram, Facebook (in both English and Spanish), TikTok, and YouTube.

21. **IBA Second Chance.** Defendant IBA Second Chance is a Georgia domestic nonprofit corporation with its principal place of business in Gwinnett County, Georgia.

22. According to IBA Second Chance's records submitted to the Georgia Secretary of State, IBA Second Chance's registered agent is Anthony Pridgen and its registered office address is 2775 Cruse Road, Suite 101, Lawrenceville, Georgia 30044.

23. In 2025, the Internal Revenue Service determined that IBA Second Chance is exempt from federal income tax under Internal Revenue Code Section 501(c)(3). IBA Second Chance, through Carlina Pridgen, reported to the Internal Revenue Service that it operates at 2775 Cruse Road, Suite 101, Lawrenceville, Georgia 30044.

24. IBA Second Chance is not, however, registered with the Georgia Secretary of State to solicit charitable contributions in or from Georgia under O.C.G.A. § 43-17-5.

25. IBA Second Chance is not a law firm and does not employ attorneys licensed in Georgia.

26. IBA Second Chance is not recognized by the DOJ as an eligible organization to provide immigration representation through accredited representatives pursuant to 8 C.F.R. §§ 292.2 and 1292.11.

27. IBA Second Chance maintains two websites: https://ibasecondchance.carrd.co/ and https://helloskip.com/b/iba-solutions-second-chance.

28. **Carlina Pridgen.** Defendant Carlina Pridgen is a Georgia resident with her primary residence in Gwinnett County, Georgia.

29. Carlina Pridgen is the chief executive officer of both IBA Solutions and IBA Second Chance. She actively operates, directs, manages, supervises, controls, and participates in the daily operations and affairs of IBA Solutions and IBA Second Chance.

30. Carlina Pridgen, with assistance from her husband, Anthony Pridgen, created IBA Solutions and IBA Second Chance, as well as their business models and practices.

31. Carlina Pridgen has been the primary face of IBA Solutions and IBA Second Chance on Instagram, Facebook, TikTok, and YouTube. She has been the primary face on IBA Solutions's website (https://ibasolution.com/) and one of IBA Second Chance's websites (https://helloskip.com/b/iba-solutions-second-chance).

32. In addition, Carlina Pridgen advertises IBA Solutions and IBA Second Chance on her personal Facebook page.

33. Carlina Pridgen filed IBA Second Chance's federal tax forms.

34. Although Carlina Pridgen possesses an active license issued by the Georgia Real Estate Commission and Appraisers Board as a real estate salesperson, she is not licensed as a real estate broker in Georgia.

35. Carlina Pridgen is not licensed to practice law in Georgia.

36. Although Carlina Pridgen once held a state license to provide immigration assistance in Georgia, that license lapsed in 2021. Carlina Pridgen is not an individual whom DOJ has authorized pursuant to 8 C.F.R. §§ 292.2 and 1292.12 to represent immigration clients on behalf of a recognized organization and whose period of accreditation is current and has not expired.

37. **Anthony Pridgen.** Defendant Anthony Pridgen is a South Carolina resident with his primary residence in Lexington County, South Carolina.

38. Together with his wife, Carlina Pridgen, Anthony Pridgen operates IBA Solutions and IBA Second Chance. He assisted Carlina Pridgen in creating IBA Solutions and IBA Second Chance as well as their business models and practices.

39. Anthony Pridgen has advertised IBA Solutions with Carlina Pridgen on YouTube and has advertised IBA Solutions on his personal Facebook page.

40. Anthony Pridgen is not licensed as a real estate broker or to practice law in Georgia.

41. Anthony Pridgen is not licensed to provide immigration assistance in Georgia and is not an individual whom the DOJ authorized pursuant to 8 C.F.R. §§ 292.2 and 1292.12 to represent immigration clients on behalf of a recognized organization and whose period of accreditation is current and has not expired.

JURISDICTION AND VENUE

42. This Court possesses subject-matter jurisdiction over this action pursuant to GA. CONST. art. 6, § 4, ¶ 1; O.C.G.A. § 10-1-397(b)(2); and O.C.G.A. § 15-6-8.

43. The Court has personal jurisdiction. IBA Solutions and IBA Second Chance have their registered offices in Georgia. Carlina Pridgen is a Georgia resident. Anthony Pridgen regularly does business and purposefully avails himself of the privilege of conducting activities in Georgia. His contacts arose out of, or are related to, the Attorney General's claims. O.C.G.A. §§ 9-10-90, 9-10-91.

44. Venue for this action is proper. IBA Solutions, IBA Second Chance, and Carlina Pridgen reside in Gwinnett County. Defendants are joint obligors and the prayer for substantial equitable relief is common among Defendants. GA. CONST. art. 6, § 2, ¶¶ 3, 4, 6; O.C.G.A. §§ 9-10-30, 9-10-31, 14-2-510, 14-3-510.

FACTUAL ALLEGATIONS

45. In 2015, Carlina Pridgen and Anthony Pridgen created IBA Solutions.

46. IBA Solutions is a for-profit credit repair services organization as defined in O.C.G.A. § 16-9-59(a)(2)(A).

47. Until recently, IBA Solutions's website (IBA Solutions, https://ibasolution.com/ (Apr. 15, 2026)) explicitly stated it provides "credit repair":



48. Defendant Carlina Pridgen advertises credit repair (Image posted by IBA Solutions (@iba.solutions), Instagram (Apr.19, 2024)):

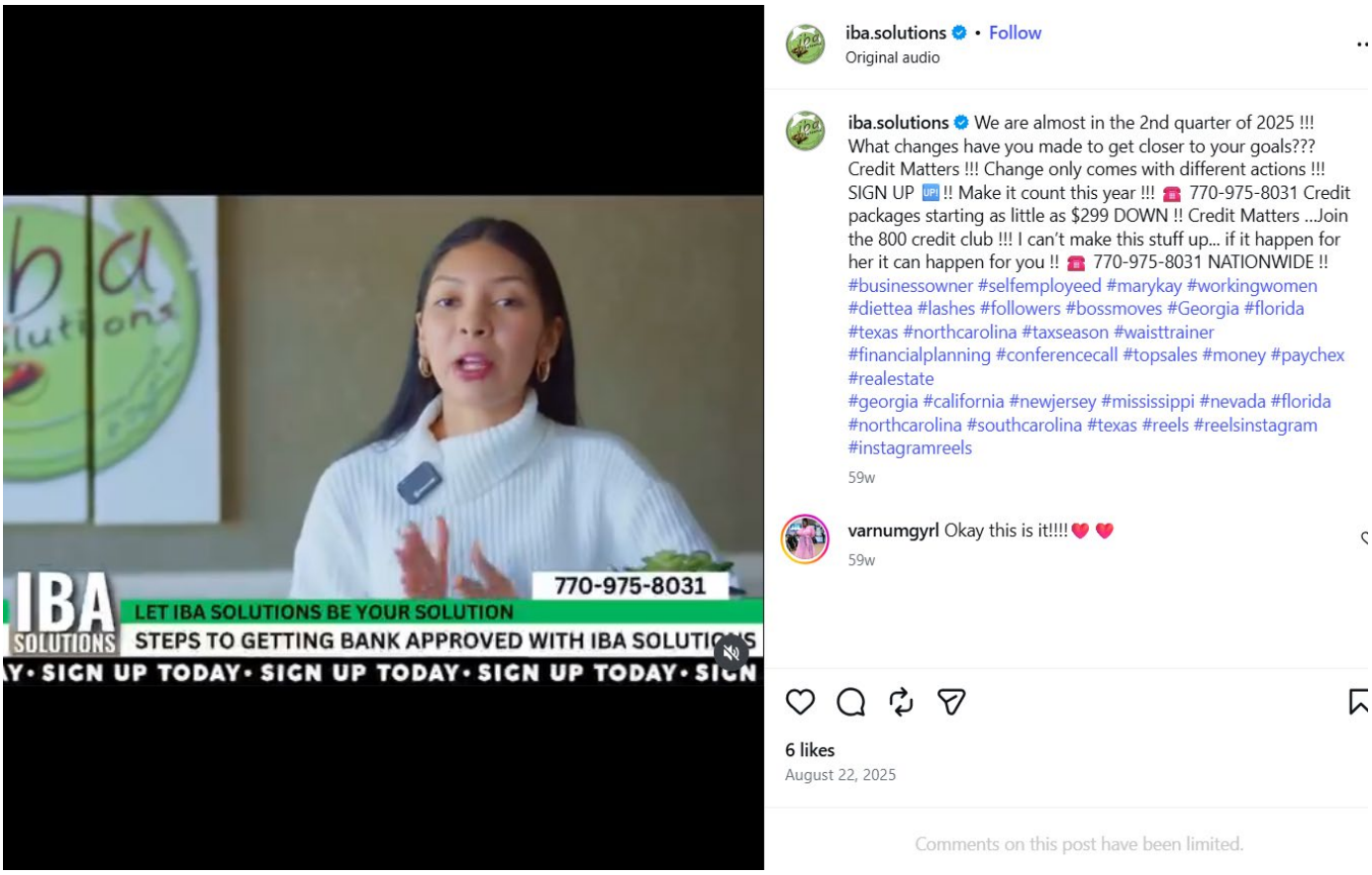


49. Defendants sell, provide, or perform, or represent that they can or will sell, provide, or perform, services to:

a. Improve a consumer's credit record, history, or rating (Image posted by IBA Solutions (@iba.solutions), Instagram (Aug. 1, 2025));



b. Obtain an extension of credit for a consumer (Image posted by IBA Solutions (@iba.solutions), Instagram (Aug. 22, 2025)); and/or



c. Provide advice or assistance to consumers in doing subparagraphs (a) or (b) above.

50. Defendants charge consumers money for the credit repair services upfront.

51. Subsections 16-9-59(b) and (c) of the Georgia Code prohibit the operation of a credit repair services organization in Georgia or with Georgia consumers unless exempt.

52. Defendants are not exempt from O.C.G.A. § 16-9-59's prohibition.

a. They are not persons authorized to make loans or extensions of credit under the laws of the State of Georgia or the United States who are subject to regulation and supervision by the State of Georgia or the United States.

b. They are not banks or savings and loan institutions whose deposits or accounts are eligible for insurance by the Federal Deposit Insurance Corporation or the

Savings Association Insurance Fund of the Federal Deposit Insurance Corporation.

c. They are not licensed as real estate brokers in Georgia.

d. They are not licensed to practice law in Georgia.

e. They are not broker-dealers registered with the Securities and Exchange Commission or the Commodity Futures Trading Commission.

f. They are not consumer reporting agencies as defined in the federal Fair Credit Reporting Act (15 U.S.C. §§ 1681–1681t).

53. Defendants IBA Solutions, Carlina Pridgen, and Anthony Pridgen are not nonprofit organizations exempt from taxation under Section 501(c)(3) of the Internal Revenue Code and thus, again, are not exempt from O.C.G.A. § 16-9-59's prohibition.

54. Defendant IBA Second Chance claims on its website (IBA Second Chance, https://ibasecondchance.carrd.co/ (last visited Oct. 16, 2026)) to "collaborate with a network of for-profit and nonprofit partners to deliver housing assistance, financial education, workforce development, and second-chance programs[.]" To do so, IBA Second Chance sells the same credit repair services as IBA Solutions, including the identity theft and fraud services described herein.

55. Defendant IBA Second Chance is a nonprofit organization exempt from taxation under Section 501(c)(3) of the Internal Revenue Code.

56. However, IBA Second Chance is affiliated with IBA Solutions. IBA Second Chance's credit repair services are performed on behalf of IBA Solutions. IBA Second Chance does not perform credit repair services as a separate, nonprofit organization. It does not have employees or operations separate from IBA Solutions.

57. Rather, IBA Second Chance is a shell corporation used to attempt to shield IBA Solutions's credit repair sales from state and federal government regulation.

58. IBA Solutions claims to have "a customer base of over 10,000 individuals."

59. IBA Solutions's (and thus IBA Second Chance's) employees use an electronic document management system to provide credit repair services to consumers.

60. Defendants advertise their services on their business websites.

61. Defendants advertise their services on their business Facebook pages, both in English and in Spanish.

62. Defendants advertise their services on their business Instagram page.

63. Defendants advertise their services on their business TikTok page.

64. Defendants advertise their services on two business YouTube channels.

65. Defendants advertise their services through unsolicited telephone calls.

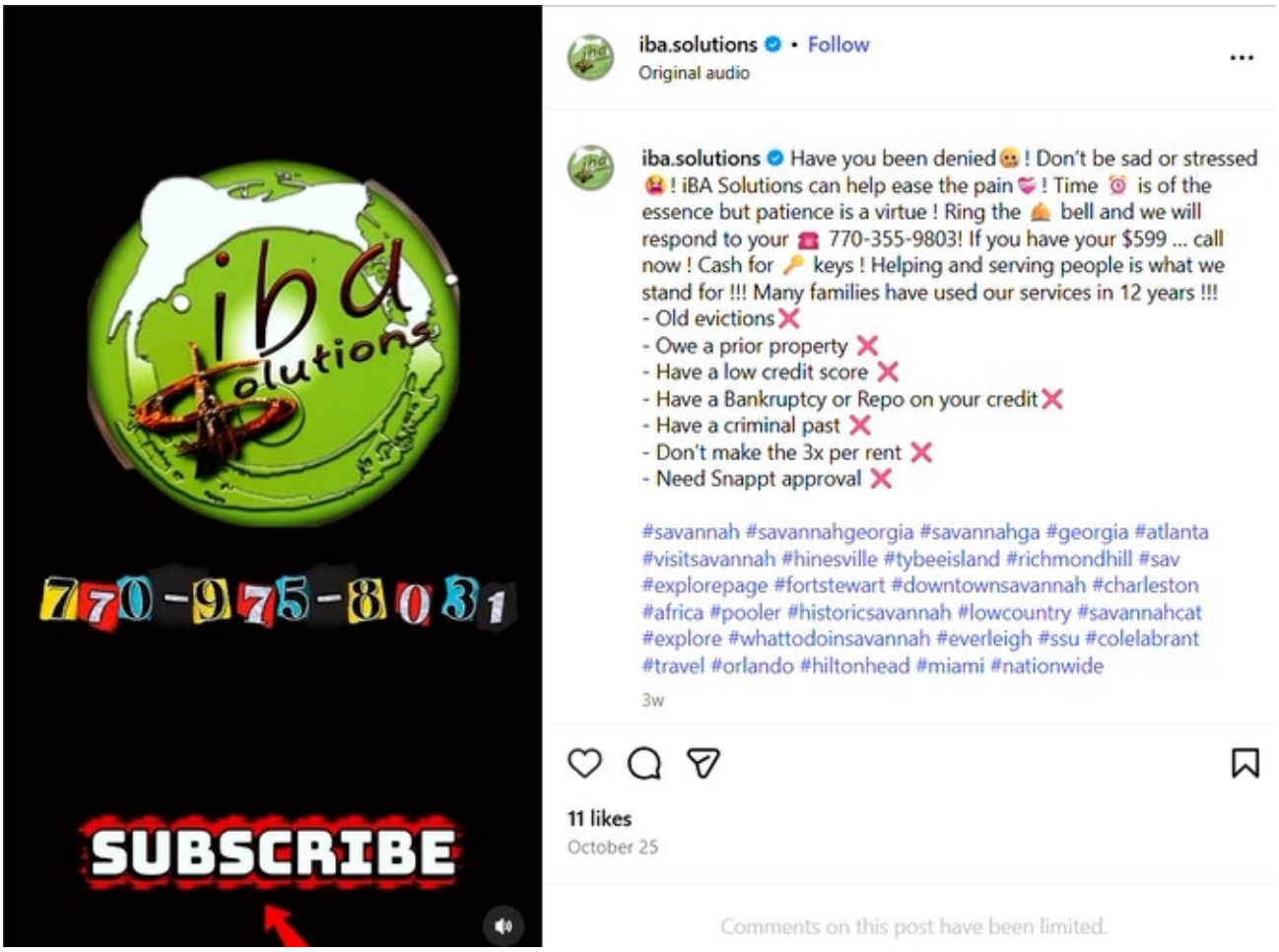
66. Defendants advertise their services through unsolicited emails.

67. Defendants advertise their services even by standing outside courthouses and approaching tenants headed to eviction proceedings.

68. Defendants assert that their services can assist consumers with, among other things, obtaining rental housing, car loans, credit cards, and mortgages.

69. Defendants promise that they can get consumers' credit scores above 800.

70. In advertising their services, Defendants represent that the consumer's credit history, credit rating, finances, criminal background, and other personal or financial circumstances do not matter and that Defendants can successfully provide their services to anyone.



(Image posted by IBA Solutions (@iba.solutions), Instagram (Oct. 25, 2025));

71. Defendants represent that they can help consumers "bypass Snappt," a program used by landlords to verify a tenant's income, identity, employment, and previous tenancies and to protect themselves from document fraud and other types of fraud.

72. Defendants' promises are too good to be true, at least through lawful means.

73. The services that they advertise are illegal on multiple grounds:

a. Defendants create fake Social Security numbers and/or appropriate Social Security numbers that have been assigned to someone else and assign the new numbers to consumers;

b. Defendants use the new Social Security numbers and other manufactured information and documents to create alternative identities to allow consumers to erase negative data that may be revealed from a background check or Snappt;

c. Defendants use the new Social Security numbers to create "consumer privacy numbers" (also known as "credit privacy numbers," "credit profile numbers," or "credit protection numbers");

d. Defendants create new, squeaky-clean credit profiles with consumer reporting agencies using the consumers' names and consumer privacy numbers as well as tradelines, newly assigned telephone numbers, and other newly created personally identifiable information, and help consumers apply for loans or housing under the new (fake) credit profiles; and

e. Defendants create counterfeit documents, including but not limited to:

   i. Social Security cards

   ii. Bank statements

   iii. Paystubs and other proof of income for nonexistent jobs

   iv. Tax documents

74. If consumers discover the illegal nature of Defendants' services and try to cancel, Defendants refuse to refund consumers' payments.

75. When selling and providing their services to consumers, Defendants moreover open their consumers up to potential criminal liability, even if consumers are unaware of Defendants' methods.

76. And Defendants' acts and practices negatively affect legitimate businesses like banks, lenders, landlords, and consumer reporting agencies and harm the integrity of public record systems as a whole.

77. IBA Second Chance lists "current donors and sponsors" on its website, including Publix, Let's Roam, Atlanta Custom Gold, Kroger, and Oriental Trading Company.

78. IBA Second Chance, however, cannot legally solicit charitable donations in or from Georgia. It has not filed a registration statement with the Georgia Secretary of State or obtained Secretary of State registration to solicit charitable contributions in or from the State of Georgia under O.C.G.A. § 43-17-5.

79. Carlina Pridgen is not a licensed attorney, but she has a longstanding pattern or practice of offering and selling legal services that she is not authorized to perform.

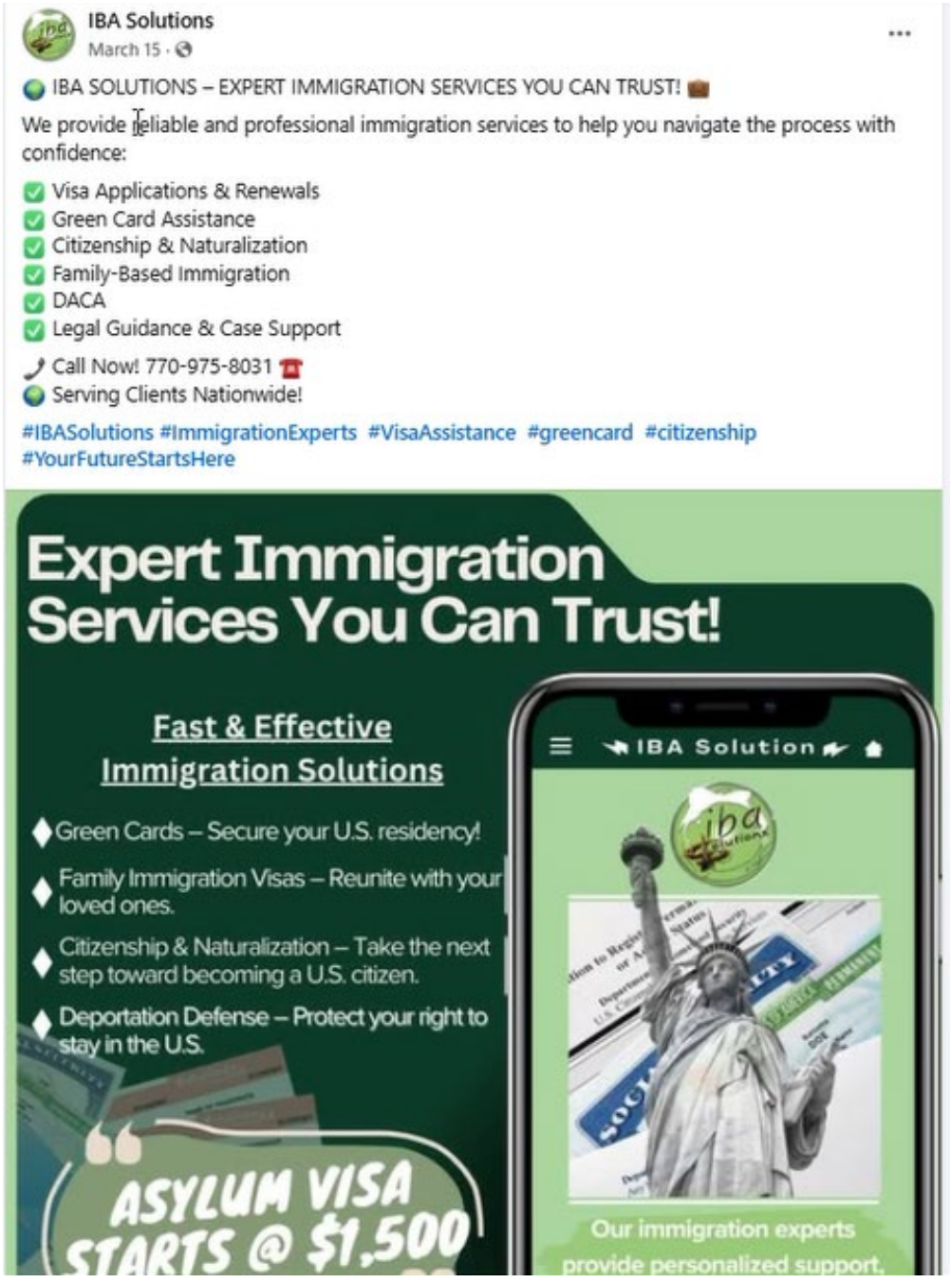
80. Before creating IBA Solutions, Carlina Pridgen–then Carlina Kiel–opened and managed The Assistance Program, Inc. Both that company and Carlina Pridgen, individually, were prosecuted and enjoined by The Florida Bar for the unlicensed practice of law in 2004.

81. On February 22, 2007, Carlina Pridgen signed a Cease and Desist Affidavit for the unlicensed practice of law in the State of Georgia.

82. Thereafter, Carlina Pridgen acted as a bankruptcy petition preparer. However, in 2012, the U.S. Trustee filed an adversary proceeding in the U.S. Bankruptcy Court for the Middle District of Georgia alleging, among other things, the unauthorized practice of law. The Court found that she had violated 11 U.S.C. § 110 and enjoined her from again acting as a petition preparer in that Court.

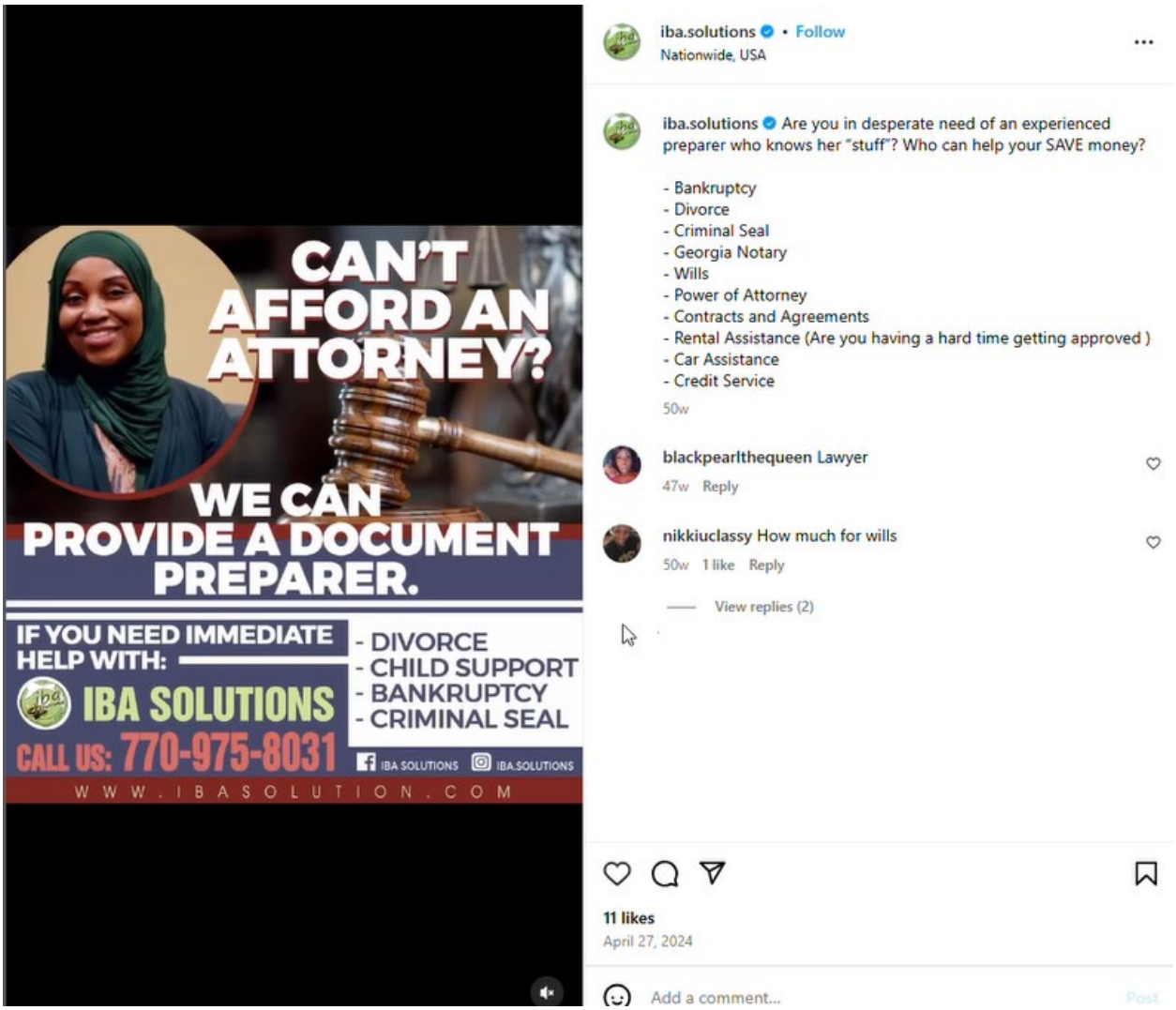
83. Yet despite being repeatedly punished for the unauthorized practice of law, Carlina Pridgen, as well as the remaining Defendants, continue to advertise and accept payments for legal services without a law license in the State of Georgia.

84. For example, Defendants advertise legal assistance in immigration matters (Image posted by IBA Solutions (@IBA Solutions), Facebook (Mar. 15, 2025)):



85. Illustrating the problem with unlicensed legal advice, Defendants represent to immigrant consumers that, if consumers hire Defendants to provide immigration services, consumers could take advantage of a "7-year-rule" that is "a potential pathway to green card eligibility for certain undocumented immigrants." There is no such seven-year-rule under United States immigration law.

86. Defendants advertise legal "document preparation" (i.e., legal work) in many other areas, including bankruptcy, divorce, wills, and contracts (Image posted by IBA Solutions (@iba.solutions), Instagram (Apr. 27, 2024))



87. Defendants represent to consumers that Defendants can provide legal assistance because Carlina Pridgen is a paralegal. But in Georgia, only attorneys licensed in Georgia are permitted to practice law–including providing legal services or advice to clients and preparing legal documents. O.C.G.A. §§ 15-19-50, 15-19-51(a).

88. Even for clerical tasks, paralegals like Carlina Pridgen may provide immigration assistance only if (a) employed or independently contracted by and under the direct supervision of a licensed attorney or (b) licensed by the State. O.C.G.A. §§ 43-20A-4, 43-20A-6(a)(2). Carlina Pridgen is neither of those things.

89. Defendants Carlina Pridgen and Anthony Pridgen are personally liable for violations of O.C.G.A. §§ 10-1-390–10-1-408.

90. Defendants Carlina Pridgen and Anthony Pridgen created, manage, and operate IBA Solutions and IBA Second Chance.

91. Defendant Carlina Pridgen personally performs credit repair services for IBA Solutions and IBA Second Chance.

92. Carlina Pridgen instructs and manages employees, solicits consumers herself, accepts consumer payments herself, and creates many of the counterfeit documents herself.

93. Carlina Pridgen personally creates legal documents and advertises, manages, operates, and performs the legal services for IBA Solutions.

94. Carlina Pridgen is the primary face of IBA Solutions and IBA Second Chance on social media and websites.

95. Carlina Pridgen and Anthony Pridgen advertise IBA Solutions and IBA Second Chance on their personal Facebook pages.

96. Carlina Pridgen and Anthony Pridgen have promoted IBA Solutions during an interview with the "Gentlemen of Style Show" on YouTube (Video posted by The Gentlemen of Style Show (@BaldwinCreechTV), YouTube (Jan. 1, 2020)).

a. In the interview, Anthony Pridgen stated that it was Carlina Pridgen's "vision" and "acumen for business" that led them to start IBA Solutions.

b. Anthony Pridgen explained that Carlina Pridgen "devised" the "strategies" for IBA Solutions, and he helped her set up and run the company so they could "go into business for [them]selves."

c. Anthony Pridgen and Carlina Pridgen explained that Defendants could provide immigration and other legal services purportedly because Carlina Pridgen is a paralegal. She was presented as an expert on immigration and credit repair laws.

97. Defendants knew and still know that the unfair and deceptive conduct described herein violates the FBPA.

98. Defendants engage and have engaged in concerted wrongdoing and profited off their business acts and practices.

99. Defendants' unfair and deceptive conduct described herein has been and continues to be intentional, and Carlina Pridgen and Anthony Pridgen knew or should have known of the acts constituting the unfair and deceptive conduct described herein. Carlina Pridgen and Anthony Pridgen directly authorized, supervised, ordered, and/or performed acts constituting, in whole or in part, the unfair and deceptive conduct described herein.

100. In addition, Carlina Pridgen and Anthony Pridgen have had actual knowledge of the unfair and deceptive conduct described herein, have been recklessly indifferent to its

unfairness and deceptiveness, and/or have had an awareness of a high probability of unfairness and deceptiveness and intentionally avoided learning of the truth. Carlina Pridgen and Anthony Pridgen participated directly in the unfair and deceptive business practices and/or had the authority to control them.

101. As a result, Carlina Pridgen and Anthony Pridgen in their individual capacities are jointly and severally liable with IBA Solutions, IBA Second Chance, and each other.

102. Defendants have operated as a common enterprise while engaging in the unlawful acts and practices alleged in this Verified Complaint, and therefore, each Defendant is jointly and severally liable for the alleged violations.

CLAIMS FOR RELIEF

COUNT I: UNFAIR AND DECEPTIVE ADVERTISING, SALE, AND PERFORMANCE OF CREDIT REPAIR SERVICES IN VIOLATION OF GEORGIA FAIR BUSINESS PRACTICES ACT, O.C.G.A. § 10-1-393(a), (b)(5), AND (b)(7)

(All Defendants)

103. The Attorney General realleges and incorporates herein by reference each of the allegations contained in paragraphs 1 through 102.

104. Defendants are using, have used, and/or are about to use unfair and/or deceptive methods, acts, and practices by, with respect to the extension of credit to a buyer by others and in return for the payment of money or other valuable consideration:

a. Selling, providing, or performing any of the following services:

   i. Improving a buyer's credit record, history, or rating;

   ii. Obtaining an extension of credit for a buyer; or

   iii. Providing advice or assistance to a buyer with regard to subparagraphs 104(a)(i) or (ii) above.

b. Advertising and otherwise representing that they can or will sell, provide, or perform any of the following services:

i. Improving a buyer's credit record, history, or rating;

ii. Obtaining an extension of credit for a buyer; or

iii. Providing advice or assistance to a buyer with regard to subparagraphs 104(b)(i) or (ii) above.

105. Defendants Carlina Pridgen and Anthony Pridgen created, operate, and are affiliated with IBA Solutions in violation of O.C.G.A. § 16-9-59(b).

106. Although Defendant IBA Second Chance is exempt from taxation under Section 501(c)(3) of the Internal Revenue Code, it is affiliated with IBA Solutions in violation of O.C.G.A. § 16-9-59(b).

107. The affiliation of IBA Solutions, Carlina Pridgen, and Anthony Pridgen with IBA Second Chance is an unfair and deceptive business practice because Defendants IBA Solutions, Carlina Pridgen, and Anthony Pridgen employ IBA Second Chance as a means of circumventing state and federal credit repair laws.

108. Defendants' acts and practices described in paragraphs 104 through 107 are themselves unfair and deceptive.

109. In addition, by advertising, selling, and engaging in their credit repair services, Defendants misrepresent that their actions are legally authorized and omit the fact that they are not.

110. Defendants' misrepresentations and omissions are material and are likely to mislead consumers acting reasonably under the circumstances.

111. Defendants' aforesaid methods, acts, and practices are unfair and deceptive and are thus unlawful under the FBPA, including O.C.G.A. § 10-1-393(a), the FBPA's general prohibition against unfair and deceptive practices.

112. Defendants' aforesaid methods, acts, and practices are unfair and deceptive under O.C.G.A. § 10-1-393(b)(5), which prohibits representing that services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not have or that a person has a sponsorship, approval, status, affiliation, or connection that she does not have.

113. Defendants' aforesaid methods, acts, and practices are unfair and deceptive under O.C.G.A. § 10-1-393(b)(7), which prohibits representing that services are of a particular standard, quality, or grade if they are of another.

COUNT II: UNFAIR AND DECEPTIVE REQUIREMENT OF PAYMENT IN ADVANCE FOR DEFENDANTS' CREDIT REPAIR SERVICES IN VIOLATION OF GEORGIA FAIR BUSINESS PRACTICES ACT, O.C.G.A. § 10-1-393(a)

(All Defendants)

114. The Attorney General realleges and incorporates herein by reference each of the allegations contained in paragraphs 1 through 102.

115. Defendants are using, have used, and/or are about to use unfair and/or deceptive methods, acts, and practices when advertising, offering, selling, and providing their credit repair services by requiring that consumers make payments in advance, which is prohibited by 15 U.S.C. § 1679b(b).

116. A violation of 15 U.S.C. § 1679b constitutes a violation of Section 5(a) of the Federal Trade Commission Act, 15 U.S.C. § 45(a).

117. Thus, Defendants' violation of 15 U.S.C. § 1679b(b) constitutes an unfair and deceptive practice prohibited by O.C.G.A. § 10-1-393(a).

COUNT III: UNFAIR AND DECEPTIVE ADVERTISING, SALE, AND PERFORMANCE OF FRAUDULENT SERVICES IN VIOLATION OF GEORGIA FAIR BUSINESS PRACTICES ACT, O.C.G.A. § 10-1-393(a), (b)(5), AND (b)(7)

(All Defendants)

118. The Attorney General realleges and incorporates herein by reference each of the allegations contained in paragraphs 1 through 102.

119. Defendants advertise that they will help consumers get a "fresh start" so that consumers can, among other things, find a place to live and a car to drive.

120. Defendants are using, have used, and/or are about to use unfair and/or deceptive methods, acts, and practices by advertising, offering, selling, and providing the following services:

a. Creating fake Social Security numbers and/or obtaining Social Security numbers and assigning the new numbers to consumers;

b. Using the new Social Security numbers to create consumer privacy numbers;

c. Creating new, clean credit profiles for consumers by pairing the consumer's name and the consumer privacy numbers with tradelines, newly assigned telephone numbers, and other new personally identifiable information and applying on the consumer's behalf for loans or rental housing under the new (fake) credit profile;

d. Creating or obtaining counterfeit documents, including but not limited to:

   i. Social Security cards;

   ii. Bank statements;

   iii. Paystubs and other proof of income for a bogus job; and

iv. Tax documents;

e. Using new Social Security numbers, newly created personally identifiable information, and counterfeit documents to create alternative identities allowing consumers to conceal any negative data that may be revealed by a background check, loan underwriting, or Snappt review, such as a criminal history, a bankruptcy, an eviction, debt, insufficient income, or a low credit score; and

f. Assisting consumers in committing the acts and practices mentioned above in subparagraphs 120(a)-(e).

121. Defendants' acts and practices described in paragraph 120 are themselves unfair and deceptive.

122. In addition, by advertising, selling, and engaging in the aforementioned conduct, Defendants misrepresent that their actions are legally authorized and omit the fact that they are not.

123. Defendants' misrepresentations and omissions are material and are likely to mislead consumers acting reasonably under the circumstances.

124. Defendants' aforesaid methods, acts, and practices are unfair and deceptive and are thus unlawful under the FBPA, including O.C.G.A. § 10-1-393(a), the FBPA's general prohibition against unfair and deceptive practices.

125. Defendants' aforesaid methods, acts, and practices are unfair and deceptive under O.C.G.A. § 10-1-393(b)(5), which prohibits representing that services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not have or that a person has a sponsorship, approval, status, affiliation, or connection that she does not have.

126. Defendants' aforesaid methods, acts, and practices are unfair and deceptive under O.C.G.A. § 10-1-393(b)(7), which prohibits representing that services are of a particular standard, quality, or grade if they are of another.

COUNT IV: UNFAIR AND DECEPTIVE ADVERTISING AND SALE OF LEGAL SERVICES WITHOUT A LICENSE IN VIOLATION OF GEORGIA FAIR BUSINESS PRACTICES ACT, O.C.G.A. § 10-1-393(a), (b)(5), AND (b)(7)

(Defendants IBA Solutions, Carlina Pridgen, and Anthony Pridgen)

127. The Attorney General realleges and incorporates herein by reference each of the allegations contained in paragraphs 1 through 102.

128. Defendants IBA Solutions, Carlina Pridgen, and Anthony Pridgen are using, have used, and/or are about to use unfair and/or deceptive methods, acts, and practices by advertising, offering, and selling legal services, including the preparation of legal documents, without a license to practice law in the State of Georgia.

129. Defendants IBA Solutions, Carlina Pridgen, and Anthony Pridgen affirmatively represented to consumers that they were permitted to perform legal services, including the preparation of legal documents, because Carlina Pridgen is allegedly trained as a paralegal. That representation is false; only Georgia-licensed attorneys may provide legal services in Georgia. Carlina Pridgen is not a licensed attorney.

130. The advertising and selling of immigration legal services by IBA Solutions, Carlina Pridgen, and Anthony Pridgen is particularly unfair and deceptive. Providing immigration legal assistance requires a license to practice law and/or federal registration or accreditation. Even nonlegal immigration assistance requires a state license. Defendants have none of those things.

131. By advertising and selling legal services, Defendants IBA Solutions, Carlina Pridgen, and Anthony Pridgen misrepresent that their actions are legally authorized and omit the fact that they are not.

132. Those misrepresentations and omissions are material and are likely to mislead consumers acting reasonably under the circumstances.

133. The aforesaid methods, acts, and practices of IBA Solutions, Carlina Pridgen, and Anthony Pridgen are unfair and deceptive and are thus unlawful under the FBPA, including O.C.G.A. § 10-1-393(a), the FBPA's general prohibition against unfair and deceptive practices.

134. The aforesaid methods, acts, and practices of IBA Solutions, Carlina Pridgen, and Anthony Pridgen are unfair and deceptive under O.C.G.A. § 10-1-393(b)(5), which prohibits representing that services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not have or that a person has a sponsorship, approval, status, affiliation, or connection that she does not have.

135. The aforesaid methods, acts, practices of IBA Solutions, Carlina Pridgen, and Anthony Pridgen are unfair and deceptive under O.C.G.A. § 10-1-393(b)(7), which prohibits representing that services are of a particular standard, quality, or grade if they are of another.

COUNT V: UNFAIR AND DECEPTIVE SOLICITATION OF CHARITABLE DONATIONS WITHOUT AUTHORIZATION IN VIOLATION OF GEORGIA FAIR BUSINESS PRACTICES ACT, O.C.G.A. § 10-1-393(a), (b)(5), AND (b)(7)

(Defendant IBA Second Chance, Carlina Pridgen, and Anthony Pridgen)

136. The Attorney General realleges and incorporates herein by reference each of the allegations contained in paragraphs 1 through 102.

137. Defendants IBA Second Chance, Carlina Pridgen, and Anthony Pridgen are using, have used, and/or are about to use deceptive methods, acts, and practices by:

a. Soliciting and/or accepting donations and other contributions without lawful authorization to do so; and/or

b. Soliciting and/or accepting donations and other contributions without disclosing that they lack authorization to do so.

138. IBA Second Chance currently is and has been (1) a charitable organization located in Georgia; (2) soliciting and/or accepting charitable contributions from persons located in Georgia; and/or (3) soliciting and/or accepting charitable contributions while in Georgia.

139. Without first having submitted an effective registration statement with the Georgia Secretary of State pursuant to O.C.G.A. § 43-17-5(a), unless exempt, charities are not authorized to:

a. Solicit and/or accept charitable contributions from persons located in Georgia;

b. Solicit and/or accept charitable contributions while in Georgia; and/or

c. Solicit and/or accept charitable contributions on behalf of a charitable organization located in Georgia.

140. IBA Second Chance is neither exempt from O.C.G.A. § 43-17-5 nor has it filed an effective registration statement with the Georgia Secretary of State and received registration, and thus it lacks authorization to solicit and/or accept contributions.

141. The acts and practices of IBA Second Chance, Carlina Pridgen, and Anthony Pridgen described in paragraphs 137 through 140 are themselves unfair and deceptive.

142. In addition, by soliciting and/or accepting donations, Defendants IBA Second Chance, Carlina Pridgen, and Anthony Pridgen impliedly represent that their actions are legally authorized and omit the fact that they are not.

143. The misrepresentations and omissions by IBA Second Chance, Carlina Pridgen, and Anthony Pridgen are material and likely to mislead donors acting reasonably under the circumstances.

144. The aforesaid methods, acts, and practices of BA Second Chance, Carlina Pridgen, and Anthony Pridgen are unfair and deceptive and are thus unlawful under the FBPA, including O.C.G.A. § 10-1-393(a), the FBPA's general prohibition against unfair and deceptive practices.

145. The aforesaid methods, acts, and practices of IBA Second Chance, Carlina Pridgen, and Anthony Pridgen are unfair and deceptive under O.C.G.A. § 10-1-393(b)(5), which prohibits representing that services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not have or that a person has a sponsorship, approval, status, affiliation, or connection that she does not have.

146. The aforesaid methods, acts, and practices of IBA Second Chance, Carlina Pridgen, and Anthony Pridgen are unfair and deceptive under O.C.G.A. § 10-1-393(b)(7), which prohibits representing that services are of a particular standard, quality, or grade if they are of another.

COUNT VI: USING TELEMARKETING AND A COMPUTER OR COMPUTER NETWORK FOR A DEVICE, SCHEME, OR ARTIFICE TO DEFRAUD A PERSON, ORGANIZATION, OR ENTITY IN VIOLATION OF GEORGIA FAIR BUSINESS PRACTICES ACT, O.C.G.A. § 10-1-393.5(b)(1)

(All Defendants)

147. The Attorney General realleges and incorporates herein by reference each of the allegations contained in paragraphs 1 through 102.

148. Defendants engage in the unlawful conduct described in Counts I through V while engaging in telemarketing as that term is defined in O.C.G.A. § 393.5(a).

149. Defendants engage in the unlawful conduct described in Counts I through V while engaging in activities involving or using a computer or computer network.

150. Defendants' unfair and deceptive conduct constitutes a device, scheme, or artifice to defraud a person, organization, or entity–including consumers and legitimate businesses.

151. Defendants' aforesaid methods, acts, and practices thus violate O.C.G.A. § 10-1-393.5(b)(1).

COUNT VII: USING TELEMARKETING AND A COMPUTER OR COMPUTER NETWORK FOR CONDUCT THAT OPERATES OR WOULD OPERATE A FRAUD OR DECEIT UPON A PERSON, ORGANIZATION, OR ENTITY IN VIOLATION OF GEORGIA FAIR BUSINESS PRACTICES ACT, O.C.G.A. § 10-1-393.5(b)(2)

(All Defendants)

152. The Attorney General realleges and incorporates herein by reference each of the allegations contained in paragraphs 1 through 102.

153. Defendants engage in the unlawful conduct described in Counts I through V while engaging in telemarketing as that term is defined in O.C.G.A. § 393.5(a).

154. Defendants engage in the unlawful conduct described in Counts I through V while engaging in activities involving or using a computer or computer network.

155. Defendants' unfair and deceptive conduct constitutes an act, practice, or course of business that operates or would operate as a fraud or deceit upon a person, organization, or entity–including consumers and legitimate businesses.

156. Defendants' aforesaid methods, acts, and practices thus violate O.C.G.A. § 10-1-393.5(b)(2).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that this Court enter an Order:

(a) Finding and declaring under O.C.G.A. § 10-1-397(b)(2)(C) that Defendants have violated O.C.G.A. § 10-1-393(a), (b)(5), and (b)(7), that each unlawful act, practice, and misrepresentation constitutes a separate and independent violation of O.C.G.A. § 10-1-393(a), (b)(5), and (b)(7), and that each day of a continuing violation constitutes a separate and independent violation of O.C.G.A. § 10-1-393(a), (b)(5), and (b)(7);

(b) Finding and declaring under O.C.G.A. § 10-1-397(b)(2)(C) that Defendants have violated O.C.G.A. § 10-1-393.5, that each unlawful act, practice, and misrepresentation constitutes a separate and independent violation of O.C.G.A. § 10-1-393.5, and that each day of a continuing violation constitutes a separate and independent violation of O.C.G.A. § 10-1-393.5;

(c) Finding and declaring under O.C.G.A. § 10-1-397(b)(2)(C) that each violation of O.C.G.A. § 10-1-393(a), O.C.G.A. § 10-1-393(b)(5), O.C.G.A. § 10-1-393(b)(7), and O.C.G.A. § 10-1-393.5 constitutes an intentional violation under O.C.G.A. § 10-1-392(b);

(d) Preliminarily and permanently enjoining Defendants from engaging in the unlawful, unfair, and deceptive conduct described herein pursuant to O.C.G.A. § 10-1-397(b)(2)(A);

(e) Assessing a civil penalty against Defendants in the amount of $5,000.00 per violation of the FBPA pursuant to O.C.G.A. § 10-1-397(b)(2)(B);

(f) Requiring Defendants to disgorge all revenue they obtained from the unlawful, unfair, and deceptive conduct described herein pursuant to O.C.G.A. § 10-1-397(b)(2)(F);

(g) Awarding Plaintiff the costs of suit; and

(h) Granting other relief as the Court deems just and equitable.

Dated: October 23, 2026.

Respectfully submitted,

CHRISTOPHER M. CARR 112505
Attorney General

Daniel Walsh 735040
Deputy Attorney General

s/Melissa M. Devine
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VERIFICATION OF TOM FOGELSONG

IN THE SUPERIOR COURT OF GWINNETT COUNTY
STATE OF GEORGIA

STATE OF GEORGIA, *ex rel.* CHRISTOPHER M. CARR, ATTORNEY GENERAL OF THE STATE OF GEORGIA,	)	
PLAINTIFF,	)	
v.	)	**CIVIL ACTION FILE NO. _____**
IBA SOLUTIONS LLC, IBA SOLUTIONS SECOND CHANCE CORPORATION, CARLINA PRIDGEN, Individually, and ANTHONY PRIDGEN, Individually,	)	
DEFENDANTS.	)	

VERIFICATION OF TOM FOGELSONG

Personally appeared before the undersigned attesting officer, duly authorized to administer oaths, Tom Fogelsong, who, after being duly sworn, on oath states and deposes that he is the civil investigator for the Plaintiff in the pleading entitled "Verified Complaint" filed with the Clerk of the Superior Court of Gwinnett County on October 23, 2026. This Verification confirms that he has read the Verified Complaint; that the factual statements contained in the Verified Complaint are true and correct to the best of his personal knowledge after investigation and inquiry; that the Verified Complaint is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law; that the act forming the basis for the Verified Complaint is not a privileged communication under paragraph (4) of O.C.G.A. § 51-5-7; and that the Verified Complaint is not interposed for any improper purpose whatsoever.

This 23rd of October, 2026.

Tom Fogelsong, Civil Investigator
Georgia Department of Law
Consumer Protection Division
40 Capital Square SW
Atlanta, GA 30034

Sworn to and subscribed before me

this 23rd day of October, 2026.

Pamela Coyne

(Notary)

My commission expires: 01/29/2029