

**IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT IN AND FOR  
ALACHUA COUNTY , FLORIDA.**

RENDA OKIKE,  
AMANDA OKIKE,  
CHIDOZIE OKIKE,

)  
)  
)  
)

01 2025 CA 001964

COMPLAINT  
AND  
JURY DEMAND

Plaintiffs,

)

v.

)

CAMPUS USA CREDIT UNION,

)

Defendant.

)

/

COMES NOW, Plaintiffs, Renda Okike, Amanda Okike and Chidozie Okike, and for the reasons stated below, sue Defendant Campus USA Credit Union, and in support thereof, respectfully alleges as follows:

**JURISDICTION AND PARTIES**

1. This is an action by Plaintiffs Renda Okike (hereinafter "Ms. Renda"), Amanda Okike (hereinafter "Ms. Amanda") and Chidozie Okike (hereinafter "Mr. Okike") against Defendant Campus USA Credit Union (hereinafter "Campus USA") for violations of Fla. Stat. §760.08, violations of Fla. Stat. §837.05, negligence, intentional infliction of emotional distress, fraud, and defamation.

2. Ms. Renda, Ms. Amanda and Mr. Okike are all residents of the State of Florida.

3. Campus USA Credit Union is a Credit Union headquartered in and doing business across the state of Florida and may be served by its President and CEO: Jerry Benton, 14007 NW 1st Rd, Newberry, FL 32669.

4. At all material times, Campus USA's mailing address was and is 14007 NW 1st Rd, Newberry, FL 32669.

5. At all material times, Campus USA, including its employees, contractors and agents had substantial, and not isolated, contacts with the State of Florida where it owned, operated, managed, maintained, controlled, conducted and/or engaged in or carried on business including

but not limited to operating and managing nearly 18 credit unions offering banking, financial, credit and mortgage services to clients throughout the state of Florida.

6. This Court has both general and specific jurisdiction over Campus USA because inter alia, the entity conducted substantial business activity within this state, maintained offices, employees, and agents within this state and caused a tortious act within this state.

7. This Court has both general and specific jurisdiction over Campus USA because Campus USA has offices for transaction of its customary business across five counties in Florida, including Alachua County.

### **VENUE**

8. Pursuant to Fla. Stat. §47.011, venue is proper against Campus USA in any county where such corporation has, or usually keeps an office for transaction of its customary business.

9. Venue is proper in Alachua County as Campus USA has or usually keeps an office for transaction of its customary business in this county.

### **FACTUAL BACKGROUND**

11. Mr. Okike is a 34-year-old Nigerian American man who has been a loyal customer of Campus USA Credit Union for over 4 years. He is the owner of Obcube LLC, Newberry with over 6 years' experience as a Sales expert with Morgan Auto Group. Ms. Renda is a 42-year-old Caucasian American woman who has been a member of Campus USA since Oct 2023. She is currently the Director of Clinical services for Palm Gardens Nursing Home, Gainesville with over 20 years' experience. Ms. Amanda is a 45-year-old Caucasian American woman who has also been a member of Campus USA since Oct 2023. She is an Esthetician with Ageless Spa. Prior to this, she was the Assistant Manager at AMSCOT Financial, Ocala with over 3 years' experience in financial services.

12. Upon information and belief, Campus USA is a Florida Banking institution and a member of the NCUA, which promises equitable treatment of creditors. Within the past few years, Campus USA has claimed over \$3.4 billion in assets, and currently has more than 500 employees and 20 branches.

13. Upon information and belief, Campus USA prides itself on a mission to empower members so that they may reach their full potential financially -and to provide world-class service as Gainesville Florida Campus Federal Credit Union in 1935. 89 years later, Ms. Renda, Ms. Amanda and Mr. Okike were unlawfully denied and deprived of the same equal banking, credit and/or commercial opportunities as Mr. Okikes's white counterparts and treated with conscious indifference towards their rights.

14. Around 4.35pm on Friday March 29, 2024, Mr. Okike drove to Campus USA located at 14007 NW First Rd in Newberry, Florida to withdraw \$5,000 from his savings account and to take out \$20,000 cash-advance from his campus USA credit card. He performed these transactions inside the bank accompanied by his 2 years old daughter and the bank cashier dispensed a receipt reflecting his total \$25,000 withdrawal.

15. Before visiting campus USA to make that withdrawal, on the same day, Mr. Okike had visited Suncoast Federal Credit Union located at 2153 NW 11th Dr in Chiefland, Florida to withdraw a \$9,000 cash advance. He then proceeded to Radiant Credit Union located at 1003 NW 22nd Ct in Chiefland, Florida to withdraw a \$30,000 cash advance. Upon leaving Campus USA, Mr. Okike visited Vystar Credit Union located at 5023 NW 8th Ave in Gainesville, Florida to withdraw \$20,000 before finally visiting Florida Credit Union located at 2803 SW 42nd St Suite 10 in Gainesville, Florida to withdraw \$15,000.

16. Mr. Okike is a member of all these credit unions mentioned above, periodically transacts business in this manner with all these credit unions above mentioned and has never had any single issue for several years of transacting business with all these financial institutions. His business dealings are legitimate, well documented with receipts of all transactions on March 29, 2024, and every other date all through the years.

17. Around 10.30am on Saturday March 30,2024, Ms. Renda, and Ms. Amanda both accompanied by Mr. Okike visited campus USA. Mr. Okike, Ms. Renda, and Ms. Amanda are family members, have the same last names and have shared the same residence for over a year. We were all very casually dressed and with sunshades on because it was a sunny day and we had planned to go clean out one of our newly acquired properties in Lake City, Florida after leaving the bank. We all were attended to by a campus USA MSR (member Service Representative). She asked what the reason was for our visit to which Ms. Renda and Ms. Amanda both replied that we want a \$33,000 personal loan. The MSR asked for IDs for both Ms. Renda and Ms. Amanda and they furnished her with their Florida Driver's Licenses. The MSR asked both women about their employments, pay, addresses, prior jobs, prior job titles and the reason for the personal loan. Ms. Renda and Ms. Amanda truthfully and completely answered all the questions directed at them both. Mr. Okike ONLY answered two questions regarding Ms. Amanda's salary and the reason for the loan. The MSR then proceeded to ask us 3 times how we were related. We truthfully answered that we were family, then we told her that Mr. Okike and Ms. Amanda are partners and Ms. Renda is our best friend. The MSR's repetitively asking us how we were related, even after we answered, made us feel very uncomfortable. Both Ms. Renda and Ms. Amanda witnessed the MSR cut her eyes at Mr. Okike several times, especially every time he spoke up.

18. The MSR then runs Ms. Renda and Ms. Amanda's credit scores and then says, "I need to speak to my manager, and I will be back". As soon as she left us alone in the office, we already knew we would be denied the loan. Approximately 10 minutes later, she walks into the office and says, "Your loan is denied due to residency." She was happy to say this. As soon as she said this, being frustrated, we got up abruptly, left her cubicle, and proceeded to leave the bank. While at the parking lot, extremely shocked, very ashamed, and humiliated by what just happened, we decided to go back in and talk to the manager about why we were denied the loan. The branch manager Michelle Lowe came out to discuss with us in the bank lobby, in front of several other customers with total disregard for our privacy without offering to take us somewhere private.

We then respectfully complained to Michelle Lowe about the poor customer service treatment

meted out to us by the MSR, she replied and said, “I told her what to say, she is a seasoned employee”. Mr. Okike and Ms. Amanda then proceeded to tell the manager that they have extensive experience in financial services and denying a loan application based on residency makes absolutely no sense especially being that our family owns 3 homes just in Newberry alone to which Michelle Lowe Replies “ Good, then you should secure the personal

loan with your home”. We explained to Michelle Lowe that we needed the money the same day that was why we opted for a personal and her asking us to secure a personal loan with our home would delay us significantly because it would require an appraisal on the home and would take 30 days at least. Michelle Lowe further stated, “the loan was denied not only based on residency but also Ms. Renda had charge-offs and a very low credit score.” We disagreed with her and told her that we all have good credit scores, high incomes, no lapse in employment and assets, direct deposits with campus USA, a low Debt-to-Income ratio and have a great financial standing with the bank. Furthermore, we had called and asked the call center about a personal loan before coming and was told that they do not base loan approval based solely on credit score. The call center had stated that campus approves personal loans based on income, employment, and would even approve loans even though the credit score is below 600 but credit score would determine the interest rates. We explained that based on all the information and our financial status and credit scores, we would qualify for a personal loan. Because we felt like we were talking to a brick wall and the Branch manager kept defending her employee’s actions, we left the bank shortly after talking to Michelle. During our whole encounter with the MSR, the branch manager and any member of Campus USA staff, no voices were raised, no offensive words were used, and we were very respectful while we expressed our grievances to the bank Manager. Mr. Okike then stated that he would be filing a formal complaint to campus USA cooperate office regarding that day’s encounter before we all left the bank that day.

19. Ms. Renda asked the MSR what her name was because we decided we would file a complaint with the cooperate of Campus USA. She gave us a Nickname “Cassie”. Ms. Renda asked her what her last name was, she refused to provide it. And when Ms. Renda asked for her business card, she said “I do not have one”.

20. On Monday April 1, 2024, at about 10am, Ms. Renda visited the campus USA branch located at 1200 SW 5th Ave in Gainesville, Florida to take out a \$5,000 cash advance. On the same day at about 10.30am, Ms. Amanda returned to the same campus USA branch located at 14007 NW First Rd in Newberry, Florida to withdraw a \$10,000 cash advance. We were forced to take out cash advances with higher interest rates because campus USA denied the personal loan with a lower interest rate we had applied for two days earlier.

20. On Monday April 1, 2024, at approximately 1.30pm, a Law enforcement officer visited our residence. He stated that Campus USA had contacted the Authorities, and he was there to do a welfare check for the ladies Ms. Renda and Ms. Amanda. Mr. Okike was home with his daughter and neither Ms. Renda nor Ms. Amanda were home because they were both at work. Mr. Okike invited the officer into his home, and he had observed that there was nothing wrong. The officer then proceeded to facetime with Ms. Renda and Ms. Amanda from their home in Newberry separately. We were extremely ashamed that the bank would treat us in such a

dehumanizing way and would suspect of us committing a crime unjustly. Mr. Okike stated to the officer that he was being racially discriminated against by Campus USA. The officer thanked us all for our cooperation, gave us the incident number and left our home. On the same day at about 7pm, the same officer ran into Ms. Renda at Hitchcock grocery store located at 24220 W Newberry Rd in Newberry and observed that she had no injuries whatsoever.

21. Upon receiving the incident report and recordings of the 911 call made to law enforcement, we found out to our utter shock and disbelief that multiple false statements, discriminatory and defamatory allegations were made targeting Mr. Okike. These false allegations were unjust, unwarranted, and discriminatory.

22. Campus USA falsely stated to law enforcement that Ms. Renda had a black eye and was covering up a black eye with her glasses. This was a completely fabricated statement made to law enforcement because she did not have a black eye. Nothing about a black eye was even mentioned while we were at the bank.

23. Campus USA stated to Law enforcement that Mr. Okike had come to “withdraw a large amount of money on Friday and was acting weird during that transaction.” This is a false statement because nothing happened on that day that was out of the ordinary and I was with my child that day. I recall the teller that day having a very pleasant conversation with me that day while my withdrawal was being processed. I have also done many larger transactions with Campus USA in the past and nothing happened that day that was unusual.

24. Campus USA stated to Law enforcement that Mr. Okike was “very aggressive” during the March 30, 2024, visit with Ms. Renda and Ms. Amanda. This is false. No one was aggressive at all and its very alarming how Mr. Okike was singled out as very aggressive when we were all present and let the branch manager know how disappointed we were all while being very respectful with no voices raised at all.

25. Campus USA stated to Law enforcement that Mr. Okike was “consistently answering all the questions directed to Ms. Renda and Ms. Amanda from the MSR”. This is false. The MSR had asked a total of 14 questions to both Ms. Renda and Ms. Amanda, and Mr. Okike has only corrected Ms. Amanda twice when she made a mistake in answering the questions about her income and about the purpose of the loan.

26. Campus USA told Law enforcement that they “want to make sure the ladies were not being abused or in danger “. This is a discriminatory and false statement made to Law enforcement by Campus USA implying that Mr. Okike is a criminal. Again, Mr. Okike was singled out, ostracized just for being a black male with a different national origin.

27. On the same day after Law enforcement came to our home, I visited the bank to file a formal complaint to the branch Manager, Michelle Lowe. This time, she invited Mr. Okike into her office. Mr. Okike stated to her that Law enforcement came to his home because he was a black, Nigerian man with two white women and that was why he was discriminated against. Mr.

Okike proceeded to get the full names of the bank employees involved in these unfortunate incidents. Michelle Lowe agreed that the MSR should have handled the situation differently and asked if we wanted to reapply for the loan again. Mr. Okike stated that they did not feel safe doing business with Campus USA anymore due to the racial discrimination he and his family went through and that the fact that the bank retaliated and sent law enforcement to our home after two days of leaving the bank. Mr Okike again asked for the names of the bank officials involved and was provided the names by Michelle Lowe this time. Michelle Lowe asked Mr. Okike whom he would be filing a complaint with and said “will it be the regional manger or who because I can give you her number” . Mr. Okike replied that he will do his research and file a complaint with the appropriate office and did not need her to give her anyone’s number and then left the bank.

28. On April 4, 2024, Ms. Renda and Ms. Amanda both called Campus USA HR to file a formal complaint. We were told someone in HR would return our calls. Jessica Milian called from the compliance and legal department. She admitted that the MSR needed more training but got verbally combative when we stated that Mr. Okike was racially discriminated against during the loan application process.

29. About 12.30pm on April 5, 2024, Ms. Renda and Ms. Amanda accompanied by Mr. Okike went to Vystar Credit Union. Ms. Amanda and Ms. Renda jointly applied for a \$33,000 personal loan. The loan Renda and Amanda applied for is completely similar to the same loan we applied for at Campus USA credit union 4 days earlier. Vystar did NOT consistently ask us how we were related and did NOT ask what we needed the funds for. Ms. Renda and Ms. Amanda got approved for a \$25,000 personal loan, Ms. Renda got approved for a \$20,000 credit card limit and Ms. Amanda got approved for an \$8,000 line of credit. In total, Ms. Renda and Ms. Amanda got approved for a total of \$41,000 cash available immediately for use. Prior to the loan application, Ms. Renda was NOT a member of Vystar Credit Union and the Vystar Credit Union employee stated that Ms. Renda has good credit and Ms. Amanda has excellent credit.

30. On April 15, 2024, both Ms. Renda and Ms. Amanda received letters of Adverse Action Notice from Campus USA Credit Union. The reasons stated in these letters for denial of their loan application are completely different from the reasons Campus USA staff verbally told us when we initially applied on March 30,2024. Both the MSR and the branch manager had stated that we were denied the loan based on residency, length of employment, very low credit score for Ms. Renda and charge-offs for Ms. Renda but the Adverse Action Notice states otherwise proving that Campus USA fabricated denial reasons.

31. It has been over 2 weeks since Mr. Okike’s, Ms. Renda’s and Ms. Amanda’s heinous treatment by Campus USA leadership and employees. This incident has been very devastating, humiliating, emotionally distressful and traumatic for their family and has shattered our lives irreparably.

32. The blatantly discriminatory, retaliatory and negligent practices of Campus USA, wherein its agents, employees and/or representatives deliberately denied Plaintiffs a fair and race-neutral banking transaction, treated them with flagrant indifference and called the police to

furnish them with false and embellished statements against Mr. Okike is nothing short of outrageous.

33. The open atmosphere of hostility towards people of color and national origin established by Campus USA created an environment permeated with discriminatory intimidation, ridicule, and insult that was so severe and pervasive that it altered the conditions of Mr. Okike, Ms. Renda, and Ms. Amanda's personal lives.

34. Due to the discriminatory and retaliatory actions of Campus USA, Ms. Renda does NOT feel safe to enter or transact business with Campus USA anymore even though she has her direct deposits, car loan, checking account, savings accounts, and a credit card with Campus USA. Mr. Okike, for these discriminatory actions feels ashamed and unsafe to enter or do any business with Campus USA without being accompanied or video recording despite having a savings, checking, line of credit and a credit card for several years with Campus USA. Ms. Amanda also does NOT feel safe ever doing business with Campus USA due to their racially discriminatory actions despite having savings and a credit card with the bank.

35. Campus USA made no secret of its hostility and disdain towards Mr. Okike, Ms. Renda and Ms. Amanda causing them mental anguish and pain, humiliation, embarrassment, outrage, and significant interference with their ability to enjoy the same quality of life and equal treatment under the law as his white counterparts.

36. The Alachua County Equal Opportunity Office investigated and issued a Final Investigative Summary and a Notice of Determination on March 10, 2025, concluding there was reasonable cause to find a violation of the Alachua County Human Rights Ordinance.

37. Plaintiffs allege they were subjected to differential treatment based on race, color, national origin, and sex in violation of Chapter 111 of the Alachua County Code and Fla. Stat. §760.08.

38. The Final Investigative Summary (Complaints EO-E-24-00003, 00009, 00010) detailed inconsistencies in loan denial reasons and a racially biased call to law enforcement, confirming an inference of disparate treatment.

39. Plaintiffs have suffered humiliation, distress, emotional pain, and financial harm as a result of Campus USA's conduct.

40. In addition to emotional and financial injury, Mr. Okike has experienced collateral consequences in an ongoing custody dispute. The false allegations of abuse and the law enforcement report triggered a referral to a batterer intervention program by Partnership for Strong Families (PFSF) and nearly caused him to lose custody of his daughter. These allegations have been weaponized by his ex-partner in custody litigation, causing continued psychological and reputational damage, and threatening his parental rights and relationship with his child.

**COUNT I**  
**Racial Discrimination in Violation of Fla. Stat. §760.08**

41. Plaintiffs repeat and realleges the allegations set forth in the foregoing Paragraphs.
42. Fla. Stat. §760.08 prohibits discrimination against persons based on race, color, national origin, sex, handicap, familial status from the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of any place of public accommodation.
43. Campus USA's treatment of Mr. Okike as described above is in violation of the rights afforded to him under the Fla. Stat. §760.08.
44. Mr. Okike is a member of a protected class; in that he is Nigerian American male and cannot be discriminated against on the basis of his race.
45. By denying his family service and calling the police on them, Campus USA intentionally deprived Mr. Okike of the same rights as are enjoyed by white citizens to the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of a place of public accommodation, namely Campus USA Credit Union branch.
46. Upon information and belief, Campus USA employees and agents have never called the police on a similarly situated male Caucasian client for coming with his family to get a personal loan.
47. Upon information and belief, Campus USA employees and agents have never deemed weird to Law enforcement or called Law enforcement on a similarly situated male Caucasian client that takes a cash advance or made a cash withdrawal from his account.
48. The actions of Campus USA, by its agents, employees, and representatives, were willful, intentional, in deliberate disregard of, and with reckless indifference to the rights and sensibilities of Mr. Okike.
49. As a direct and proximate result of those actions, the terms, conditions, and privileges of Mr. Okike, Ms. Renda and Ms. Amanda were adversely affected, and they were unlawfully harassed and disrespected solely because of the color of Mr. Okike's skin.
50. As a direct and proximate result of Campus USA's wrongful acts, Mr. Okike, Ms. Renda, and Ms. Amanda sustained damages including, but not limited to, outrage and humiliation, mental anguish, anxiety about their future, emotional distress, loss of professional reputations, and loss of the ordinary pleasures of everyday life.

**COUNT II**

### **Sex discrimination in Violation of Fla. Stat. §760.08**

51. Plaintiffs repeat and realleges the allegations set forth in the foregoing Paragraphs.
52. Fla. Stat. §760.08 prohibits discrimination against persons based on race, color, national origin, sex, handicap, familial status from the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of any place of public accommodation.
53. Campus USA's treatment of Mr. Okike as described above is in violation of the rights afforded to him under the Fla. Stat. §760.08.
54. Mr. Okike is a member of a protected class; in that he is Nigerian American male and cannot be discriminated against on the basis of his sex.
55. By denying his family service and calling the police on them, Campus USA intentionally deprived Mr. Okike of the same rights as are enjoyed by female citizens to the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodates of a place of public accommodation, namely Campus USA Credit Union branch.
56. Upon information and belief, Campus USA employees and agents have never called the police on a similarly situated female Caucasian client for coming with his family to get a personal loan and alleged abuse on a female Caucasian client in a similar situation.
57. Upon information and belief, Campus USA employees and agents have never made false statements to Law enforcement or called Law enforcement on a similarly situate female Caucasian client that takes a cash advance or made a cash withdrawal from her account.
58. The actions of Campus USA, by its agents, employees, and representatives, were willful, intentional, in deliberate disregard of, and with reckless indifference to the rights and sensibilities of Mr. Okike.
59. As a direct and proximate result of those actions, the terms, conditions, and privileges of Mr. Okike, Ms. Renda and Ms. Amanda were adversely affected, and they were unlawfully harassed and disrespected solely because of the sex of Mr. Okike.
60. As a direct and proximate result of Campus USA's wrongful acts, Mr. Okike, Ms. Renda, and Ms. Amanda sustained damages including, but not limited to, outrage and humiliation, mental anguish, anxiety about their future, emotional distress, loss of professional reputations, and loss of the ordinary pleasures of everyday life.

### **COUNT III**

### **National Origin Discrimination in Violation of Fla. Stat. §760.08**

61. Plaintiffs repeat and realleges the allegations set forth in the foregoing Paragraphs.
62. Fla. Stat. §760.08 prohibits discrimination against persons based on race, color, national origin, sex, handicap, familial status from the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of any place of public accommodation.
63. Campus USA's treatment of Mr. Okike as described above is in violation of the rights afforded to him under the Fla. Stat. §760.08.
64. Mr. Okike is a member of a protected class; in that he is Nigerian American male and cannot be discriminated against on the basis of his national Origin.
65. By denying his family service and calling the police on them, Campus USA intentionally deprived Mr. Okike of the same rights as are enjoyed by Caucasian American citizens to the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodates of a place of public accommodation, namely Campus USA Credit Union branch.
66. Upon information and belief, Campus USA employees and agents have never called the police on a similarly situated Caucasian American client for coming with his family to get a personal loan and alleged abuse on a Caucasian American client in a similar situation.
67. Upon information and belief, Campus USA employees and agents have never made false statements to Law enforcement or called Law enforcement on a similarly situate Caucasian American client that takes a cash advance or made a cash withdrawal from his/her account.
68. The actions of Campus USA, by its agents, employees, and representatives, were willful, intentional, in deliberate disregard of, and with reckless indifference to the rights and sensibilities of Mr. Okike, Ms. Renda and Ms. Amanda.
69. As a direct and proximate result of those actions, the terms, conditions, and privileges of Mr. Okike, Ms. Renda and Ms. Amanda were adversely affected, and they were unlawfully harassed and disrespected solely because of the National Origin of Mr. Okike.
70. As a direct and proximate result of Campus USA's wrongful acts, Mr. Okike, Ms. Renda, and Ms. Amanda sustained damages including, but not limited to, outrage and humiliation, mental anguish, anxiety about their future, emotional distress, loss of professional reputations, and loss of the ordinary pleasures of everyday life.

#### **COUNT IV**

#### **Intentional Infliction of Emotional Distress**

71. Plaintiffs repeats, realleges, and incorporates all other paragraphs of this complaint as is fully set forth herein.
72. Campus USA's employees and agents intentionally inflicted emotional distress upon Ms. Renda, Ms. Amanda and Mr. Okike when engaging in the above-describes actions and inactions and knew that there was a high probability that such a conduct would result in such distress.
73. Campus USA is vicariously liable for the negligence and otherwise tortious conduct of Campus USA's agents, servants, servants, employees, apparent agents and/or contractors occurring in the scope of their employment or relationship.
74. Campus USA's employees and agents outrageous conduct, namely denying Ms. Renda and Ms. Amanda a personal loan, making multiple false statements to law enforcement to compel a welfare visit to their home and discriminating against Mr. Okike caused Mr. Okike, Ms. Renda and Ms. Amanda to suffer emotional distress that no reasonable persons could be expected to endure.
75. The distress caused to Mr. Okike includes long-term emotional trauma and parental strain, as the incident was used to recommend his enrollment in a batterer intervention program, nearly resulting in loss of custody of his child and materially affecting his family court proceedings.
76. The aforementioned acts by Campus USA were the direct, proximate, and legal cause of Ms. Renda, Ms. Amanda and Mr. Okike's injuries herein alleged. Mr. Okike, Ms. Renda and Ms. Amanda's injuries include, but are not limited to, outrage and humiliation, mental anguish, anxiety about their future, physical and emotional distress, loss of professional reputation, and loss of the ordinary pleasures of everyday life.

**COUNT V**  
**Negligence**

77. Plaintiffs repeat, realleges, and incorporates all other paragraphs of this complaint as if fully set forth herein.
78. Ms. Renda, Mr. Okike and Ms. Amanda, as existing customers inside the Campus USA branch, were owed a duty of care by Campus USA employees to act as reasonable similarly situated bank employees would act under the same circumstances.
79. Campus USA is vicariously liable for the negligence and otherwise tortious conduct of Campus USA's agents, servants, employees, apparent agents and/or contractors occurring in the scope of their employment or relationship.

80. Campus USA, by and through their employees, agents, and apparent agents, breached its duty to Ms. Renda, Ms. Amanda, and Mr. Okike by engaging in the following acts or omissions.

a. Lying to Ms. Renda and Ms. Amanda about the reasons for denying their joint loan application, which they otherwise are very qualified for, based on information given by several Campus USA call center representatives.

b. Lying, fabricating, and exaggerating to law enforcement and having Law enforcement visit Plaintiffs' home on discriminatory suspicions. Mr. Okike, Ms. Renda, and Ms. Amanda posed no threat to anybody, were NEVER aggressive and had every right to know why their loan was denied.

c. Failing to train its employees and agents to cordially work with clients instead of treating them like criminals and calling the police on them.

d. Failing to train its employees and agents not to have racially, sexist, and national origin discriminatory biases and to be comfortable working with clients of all races, sex, and national origins.

e. Making false and fabricated statements to law enforcement like "Ms. Renda has a black eye", "Mr. Okike was acting weird during a transaction", "abusive situation" and "Very aggressive".

f. Failure to approve a personal loan to Ms. Renda and Ms. Amanda whom both are very well qualified for it based on discriminatory suspicions of Mr. Okike. Campus USA failed to believe that Mr. Okike, Ms. Renda, and Ms. Amanda were family members and did not believe that they shared the same residence. Campus USA could ask for other means to prove residence but failed to do so.

81. Campus USA's negligence foreseeably contributed to significant collateral consequences, including damaging Mr. Okike's reputation in family court proceedings and interfering with his ability to maintain custody of his daughter.

82. The aforementioned acts and omissions by Campus USA were the direct, proximate, and legal cause of Ms. Renda, Mr. Okike and Ms. Amanda's injuries herein alleged. Mr. Okike, Ms. Renda and Ms. Amanda's injuries include, but not limited to, suffering, outrage and humiliation, mental anguish, anxiety about their future, emotional distress, loss of professional reputation, and loss of ordinary pleasures of everyday life.

**COUNT VI**  
**Unfair Lending Practices in Violation of Florida Law**

83. Campus USA, as a financial institution, has a duty under Florida law to apply its lending standards in a fair, consistent, and nondiscriminatory manner and in accordance with applicable state consumer protection laws.
84. Campus USA's denial of the personal loan to Plaintiffs involved misleading, inconsistent, and opaque practices. The verbal reasons for denial provided by Campus USA staff differed from the reasons documented in writing on Adverse Action Notices, as confirmed in the Final Investigative Summary.
85. Plaintiffs were denied the opportunity to have their loan considered by Campus USA's Central Lending Department, despite the manager's later admission that such an option was available.
86. Campus USA failed to adequately explain its credit and residency standards, and inconsistently applied its internal loan policy guidelines.
87. As a result of these unfair and inconsistent lending practices, Plaintiffs were forced to seek alternative high-interest credit elsewhere and suffered unnecessary financial harm, emotional distress, and reputational damage.
88. The aforementioned acts and omissions by Campus USA were the direct, proximate, and legal cause of Ms. Renda, Mr. Okike and Ms. Amanda's injuries herein alleged. Mr. Okike, Ms. Renda, and Ms. Amanda's injuries include, but not limited to, suffering, outrage and humiliation, mental anguish, anxiety about their future, emotional distress, loss of professional reputation, and loss of ordinary pleasures of everyday life.

**COUNT VII**  
**False reports to Law enforcement Authorities in Violation of Fla. Stat. §837.05**

89. Plaintiffs repeat and realleges the allegations set forth in the foregoing Paragraphs.
90. According to Fla. Stat. §837.05, a person who knowingly gives false information to a law enforcement officer concerning the alleged commission of any crime, commits a misdemeanor of the first degree.
91. Campus USA's treatment of Mr. Okike as describes above is in violation of Fla. Stat. §837.05.

92. By calling the police and making several false statements concerning Mr. Okike about commission of a crime, Campus USA is in violation of Fla. Stat. §837.05.
93. The actions of Campus USA, by its agents, employees, and representatives, were willful, intentional, in deliberated disregard of, and with reckless indifference to the rights and sensibilities of Mr. Okike.
94. The false reports made by Campus USA to law enforcement were subsequently relied upon by child welfare stakeholders and family court, causing serious legal repercussions for Mr. Okike including loss of credibility in custody hearings and a referral to a batterer intervention program.
95. As a direct and proximate result of those actions, the terms, conditions, and privileges of Mr. Okike, Ms. Renda and Ms. Amanda were adversely affected, and they were unlawfully harassed and disrespected on false suspicions of a crime by Campus USA.
96. As a direct and proximate result of Campus USA's wrongful acts, Mr. Okike, Ms. Renda, and Ms. Amanda sustained damages including, but not limited to, outrage and humiliation, mental anguish, anxiety about their future, emotional distress, loss of professional reputations, and loss of the ordinary pleasures of everyday life.

**COUNT VIII**  
**Defamation**

97. Plaintiffs repeat, realleges, and incorporates all other paragraphs of this complaint as if fully set forth herein.
98. Campus USA's employees and agents intentionally defamed Mr. Okike, Ms. Renda and Ms. Amanda when engaging in the above-described actions and inactions and knew that those actions constituted a defamation of Mr. Okike, Ms. Renda, and Ms. Amanda's Character.
99. Campus USA wrote and sent an email to their cooperate headquarters. This email was filled with false information and can/has damaged the reputation of Mr. Okike, Ms. Renda, and Ms. Amanda. Campus USA also irresponsibly and without verifying the claims on the email, intentionally conveyed these false accusations to Law enforcement.
100. The aforementioned acts and omissions by Campus USA were the direct, proximate, and legal cause of Ms. Renda, Mr. Okike and Ms. Amanda's injuries herein alleged. Mr. Okike, Ms. Renda, and Ms. Amanda's injuries include, but not limited to, suffering, outrage and

humiliation, mental anguish, anxiety about their future, emotional distress, loss of professional reputation, and loss of ordinary pleasures of everyday life.

101. As a result of these defamatory statements, Mr. Okike has suffered not only reputational harm but legal harm in the form of a PFSF referral and adverse use of these statements in custody proceedings.

**WHEREFORE**, Plaintiffs pray for judgment against Defendant, Campus USA Credit Union, and request the following relief:

(a) Compensatory damages in the total amount of Ninety Million Dollars (\$90,000,000.00), including: (i) Economic damages for financial losses stemming from denial of credit, increased loan costs, and litigation-related expenses; and (ii) Non-economic damages for emotional distress, humiliation, embarrassment, and pain and suffering;

(b) Punitive damages for Defendant's willful, malicious, and reckless conduct;

(c) Damages for reputational harm caused by false accusations and defamatory statements;

(d) Damages for interference with child custody proceedings and loss of parental rights;

(e) Such other relief as this Court deems just and proper.

### **JURY DEMAND**

Plaintiffs hereby demand a trial by jury of all the issues in this cause.

### **CERTIFICATION OF COMPLIANCE**

Plaintiffs hereby certify that they have exhausted all applicable administrative remedies as required under Chapter 760, Florida Statutes, including filing a formal complaint with the Alachua County Equal Opportunity Office, which issued a finding of reasonable cause related to the allegations contained in this Complaint.

### **VERIFICATION**

We, the undersigned Plaintiffs, hereby certify under penalty of perjury that we have read the foregoing Complaint and that the facts stated therein are true and correct to the best of our knowledge, information, and belief.



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RENDA OKIKE



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AMANDA OKIKE

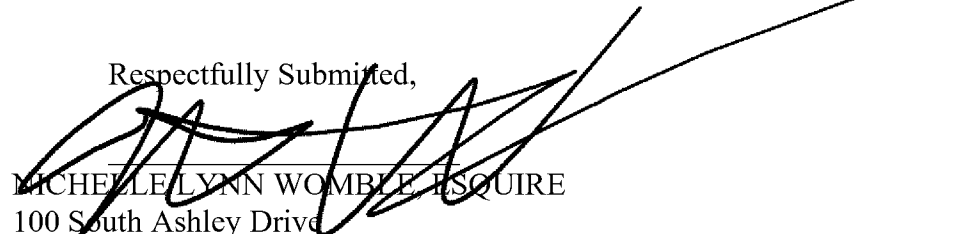


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CHIDOZIE OKIKE

Dated: JUNE 26, 2025

Respectfully Submitted,



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