How Turnover Receivers are Used in Harris County Debt Cases

New case-level analysis of debt collection lawsuits filed in 2023-2024 in justice court offers a snapshot of where, when, and how receivers are requested and used

Texas Appleseed

List of terms and definitions

- **Plaintiff**: A company that is suing someone for an alleged debt
- **Defendant:** The person who is being sued for an alleged debt
- **Judgment**: A decision by the court, which either is in favor of the defendant or the plaintiff. If in favor of the plaintiff, that means that the person owes a debt
- **Judgment debtor:** Once a defendant loses the case, the defendant now becomes a “judgment debtor”
- **Judgment creditor:** Once a plaintiff wins the case, the plaintiff now becomes a “judgment creditor”
- **Turnover receiver**: A judgment creditor can request a turnover receiver to locate, take control of, and liquidate a consumer’s non-exempt property to satisfy the judgment

What is a turnover receivership?

A turnover receivership is a post-judgment collection mechanism used in debt collection cases that allow courts to appoint a third party — a receiver — to locate, take control of, and liquidate a consumer's non-exempt property to satisfy a judgment. After a judgment is granted, plaintiffs can request specific turnover receivers by filing a motion with the court. In some courts, the documents are reviewed and signed by a judge and in others a hearing is scheduled. Generally, the judge appoints the receiver requested by the plaintiff.

While other states have similar systems to collect court judgments, Texas stands out in the use of turnover receivers for small consumer debts. Over the past two decades, receiverships have evolved to become a cottage industry with broad powers to extract money from working people — primarily through freezing and seizing funds in bank accounts and digital wallets.

Texas has strong wage garnishment protections, which exempt wages from seizure. Turnover receivers are generally also prohibited from collecting wages; but this restriction is applied inconsistently around the state. A body of case law interprets CPRC § 31.002(f) to mean that the proceeds or disbursement of wages are exempt from seizure by a turnover receiver. Nevertheless, judges have frequently allowed seizure of wages through freezing and seizing money from accounts on payday.

How do turnover receivers impact Texans?

Turnover receivers commonly charge a contingency fee of roughly 25 percent of what they recover, increasing the total balance judgment debtors must pay. The only other state with a similar commission or contingency fee is New Jersey, which permits a 10% commission. Once a turnover receiver has been appointed, the term is for 180 days in justice court, where most debt collection cases are filed, but the judgment creditor can request extensions. Some creditors get around the 180-day limit by requesting an extension that lasts until the debt is fully collected, a practice that appears to go against the intent of current rules to limit the duration of receiverships.

Receiverships were initially intended as a tool to collect hard-to-reach assets from sophisticated debtors after the creditor had exhausted other avenues to collect. In more recent years, they are being used to collect small consumer debts. Once appointed, receivers have vast powers to seize non-exempt property, and they primarily take money from people's bank accounts by freezing the accounts and seizing the money. The practical effect is that people can lose access to all the money in their accounts from one day to the next, rendering them destitute, with no money to pay rent or bills.

Debt collection lawsuits are surging in Texas. The high level of default judgments and growing rates of identity theft in Texas mean many people may not know there is a debt judgment against them until they suddenly lose access to all their money.* In 2020, the Texas Judicial Council adopted a resolution to request to the legislature to modernize post-judgment collections to protect wages by creating a basic cost of living exemption to ensure that people are left with money to cover necessities.

* Based on FY 2025 data from the Texas Office of Court Administration, 60.1% of debt collection judgments (which excludes dismissals and any other disposition that does not result in a judgment) in justice courts were default judgments. The Federal Trade Commission reported a 29% increase in Texas identity theft complaints from 2024 to 2025.

What does a typical turnover receivership look like?

Within this study period, most turnover receivers are requested within 213 days of the judgment having been entered. Turnover receivers are appointed for a term of 180 days, at which point they can be extended. The following timeline maps out the median time to disposition and the median time to the request for a turnover receiver.

Because a judgment can be enforced for 10 years (with the ability to renew), a case could have a turnover receiver appointed many years after the judgment. This study looks at cases filed in 2023-2024. For example, it is possible that a case filed in 2023 could have a turnover receivership in 2027 or later, which is outside of this study period.

0 days
Plaintiff files a lawsuit

+190 days
The court enters a judgment or the parties reach an agreement

+213 days
If the judgment debtor did not pay following the judgment or stopped making payments according to the agreement, the judgment creditor requests a turnover receiver

+180 days
The turnover receiver has 180 days to obtain non-exempt property from the judgment debtor to pay down the debt

+optional extension
If the turnover receiver cannot obtain property, the judgment creditor can request an extension of time for the turnover receiver

Key findings

- **Turnover receivers substantially increase the amount judgment debtors must pay.** Turnover receivers typically charge a 25% contingency fee plus expenses, but can charge more based on "reasonableness." This fee is collected on top of the value of the judgment.
- **Turnover receivers are common.** Of cases with a default judgment in the study period, judgment creditors requested a turnover receivership in 40% of them. And of cases with an agreed judgment, judgment creditors requested a turnover receivership in 8.6% of them. Anecdotally, these percentages appear to be even higher in more recent cases.
- **Just ten companies filed 79% of all turnover receivership requests** in Harris County.
- **Judgment debtors don't often request personal property exemptions, which can include wages in bank accounts.** Only 167 did out of 15,303 cases with granted turnover receiverships.

Methodology and Key Terms

How did we conduct this research?

There is limited data on how turnover receivers are used in debt collection in Texas. This analysis helps to fill that gap using debt collection cases that were filed in 2023 and 2024 in Harris County justice courts. With the help of The Pew Charitable Trusts, we accessed and analyzed court data from Harris County, TX, to see how many plaintiffs (generally creditors and debt buyers) were requesting turnover receiver appointments, where these requests were being made, and what happened in these cases. The views expressed herein are those of Texas Appleseed and do not necessarily reflect the views of The Pew Charitable Trusts.

In 2023 and 2024, there were 131,475 debt collection lawsuits filed. Of these lawsuits, there were an associated 18,612 turnover receivers requested and/or appointed. For these lawsuits, we then accessed Harris County's ***Find My Case*** portal for all related hearings, judgments, party, events, and financial information associated with each case number to identify which cases had an associated event related to a turnover receivership. All event data is current as of May 21, 2026. This means that if a case was filed in 2023 and had a turnover receiver appointed in 2025, this would be captured in our dataset.

How did we conduct the document review?

In addition, to identify how much a judgment debtor ultimately pays if a turnover receiver is appointed, we reviewed the underlying documents for a random sample of cases that had a closed receivership. In total, there were 1,585 cases that had a release of judgment – meaning that the judgment creditor had marked the lawsuit as satisfied. Of these, we took a random sample.

To determine how many cases to review, we used Cochran's formula and adjusted for a finite sample. At a confidence level of 95% and a margin of error at 5%, this means that we must sample at least 310 cases. We ultimately reviewed 331 cases.

For this sample, we reviewed court documents to code who the turnover receivers were, judgment amount, amount ultimately paid to the plaintiff, and amount paid to the turnover receiver. We blind coded 5 cases to confirm interpretation and then confirmed understanding across two independent coders for any questions raised.

Data limitations

This information was downloaded from the court's website and was not confirmed by the Texas courts to be all cases filed in 2023 and 2024. Because we did not have confirmation that this was the full universe of cases, we had an independent third party replicate the downloads and re-run all the analyses. Because of this protocol, we are confident that we have obtained all cases with turnover receivers in Harris County.

Because this analysis is limited to Harris County, we are not able to generalize trends statewide. Despite not being able to say that the trends in Harris County hold exactly true in other counties, we do know that turnover receivers are a common method of enforcing judgments and impact tens of thousands of people. Highlighting the impact of turnover receivers in Harris County illuminates what this can look like in other counties.

In FY 2025, there were 457,299 debt collection lawsuits filed statewide in Texas justice courts. This is the highest number of cases in six years.

What Does the Landscape of Debt Collection Litigation Look Like in Harris County?

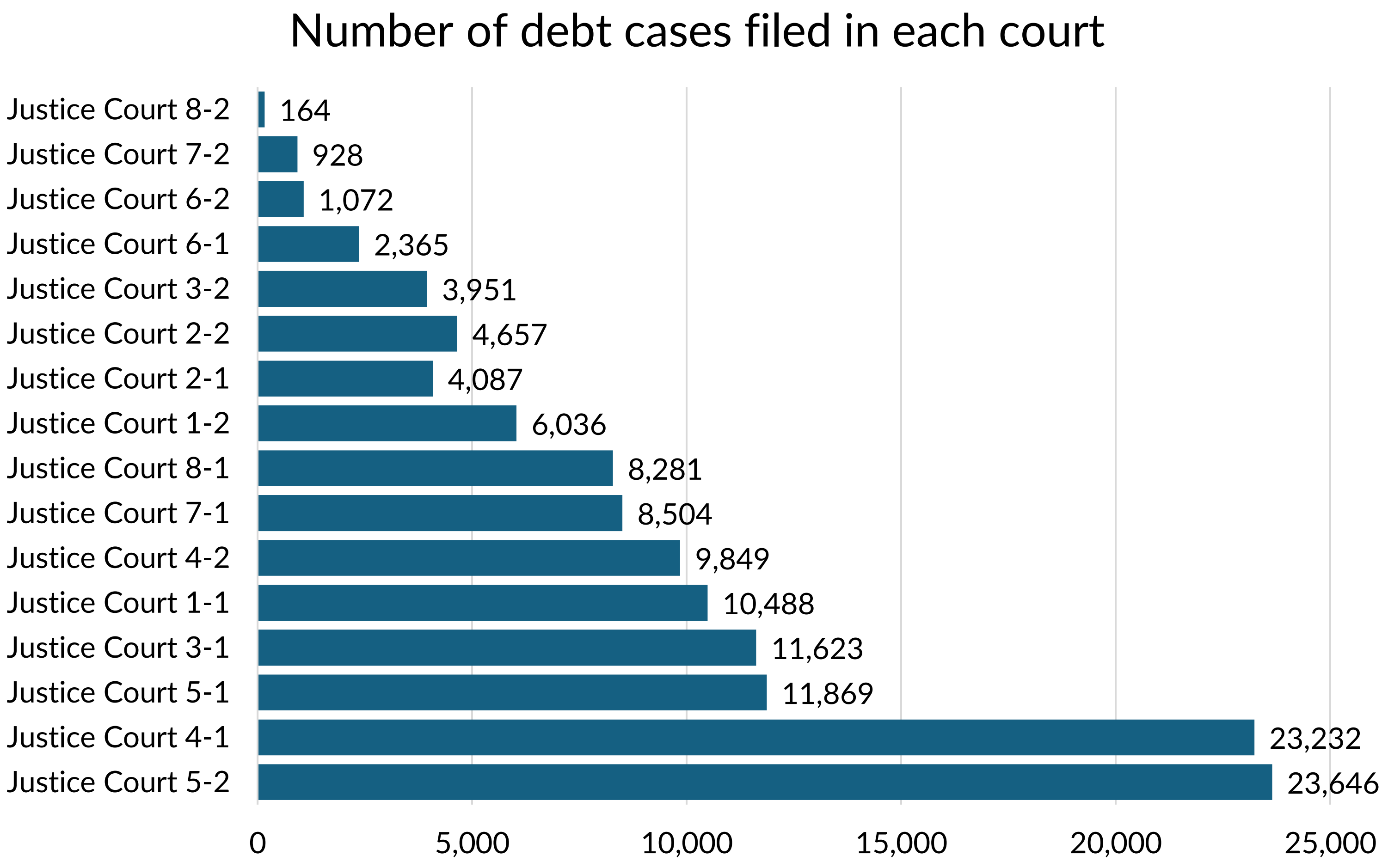
Filings are not evenly distributed across justice courts

How many lawsuits were filed in Harris County justice courts in 2023-2024?

In Texas, debt lawsuits can also be filed in county and district courts, but justice courts have jurisdiction for cases in which the amount in controversy is less than $20,000. Most consumer debt lawsuits are filed in justice court.

Harris County has 16 justice courts, divided among eight precincts and with two courts per precinct. There were 131,475 debt collection lawsuits filed in these courts in 2023 and 2024.

Debt filings vary widely across these courts, with some courts handling far more cases than others. The number of filings is reflective of the population in these precincts, where precincts 4 and 5 have larger populations.



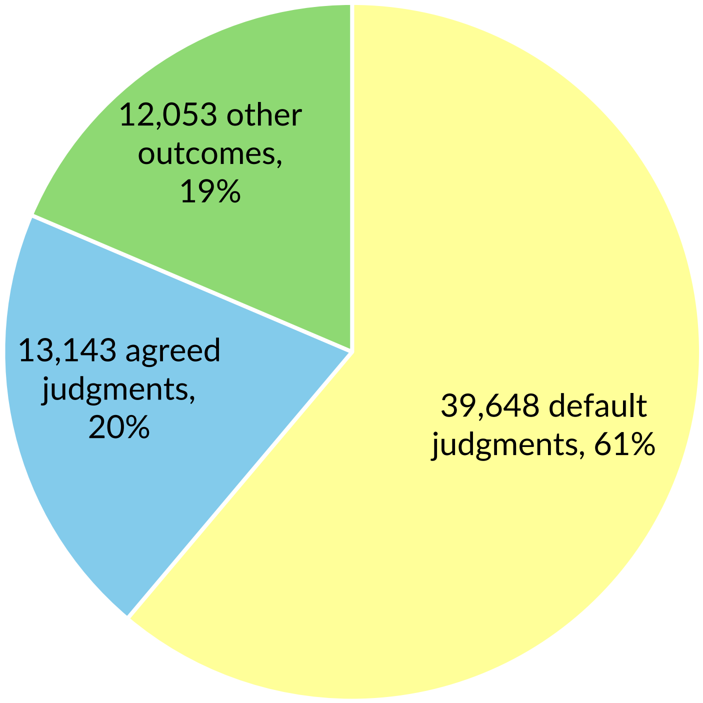
How do debt lawsuits end? For each of these outcomes, how many turnover receiverships are requested?

Of cases with a default judgment, judgment creditors requested a turnover receivership in 40% of them.

Of cases with an agreed judgment, judgment creditors requested a turnover receivership in 8.6% of them.

In addition to the judgment data presented in the pie chart, there were 50,761 dismissed cases and 15,870 cases with no recorded disposition.

Outcomes for cases with judgments



The universe of cases were those filed in 2023-2024. Other outcomes include “all other dispositions”, ‘trial or hearing by judge”, “transfer case”, “all other dispositions except dismissal”, “appeal filed”, “judgment set aside”, “trial by jury”, “affirmative finding” and “trial dismissed by prosecution”.

Which Courts are Ruling on Turnover Receiverships and Who is Requesting Them?

Requests for turnover receiverships are not evenly distributed across courts

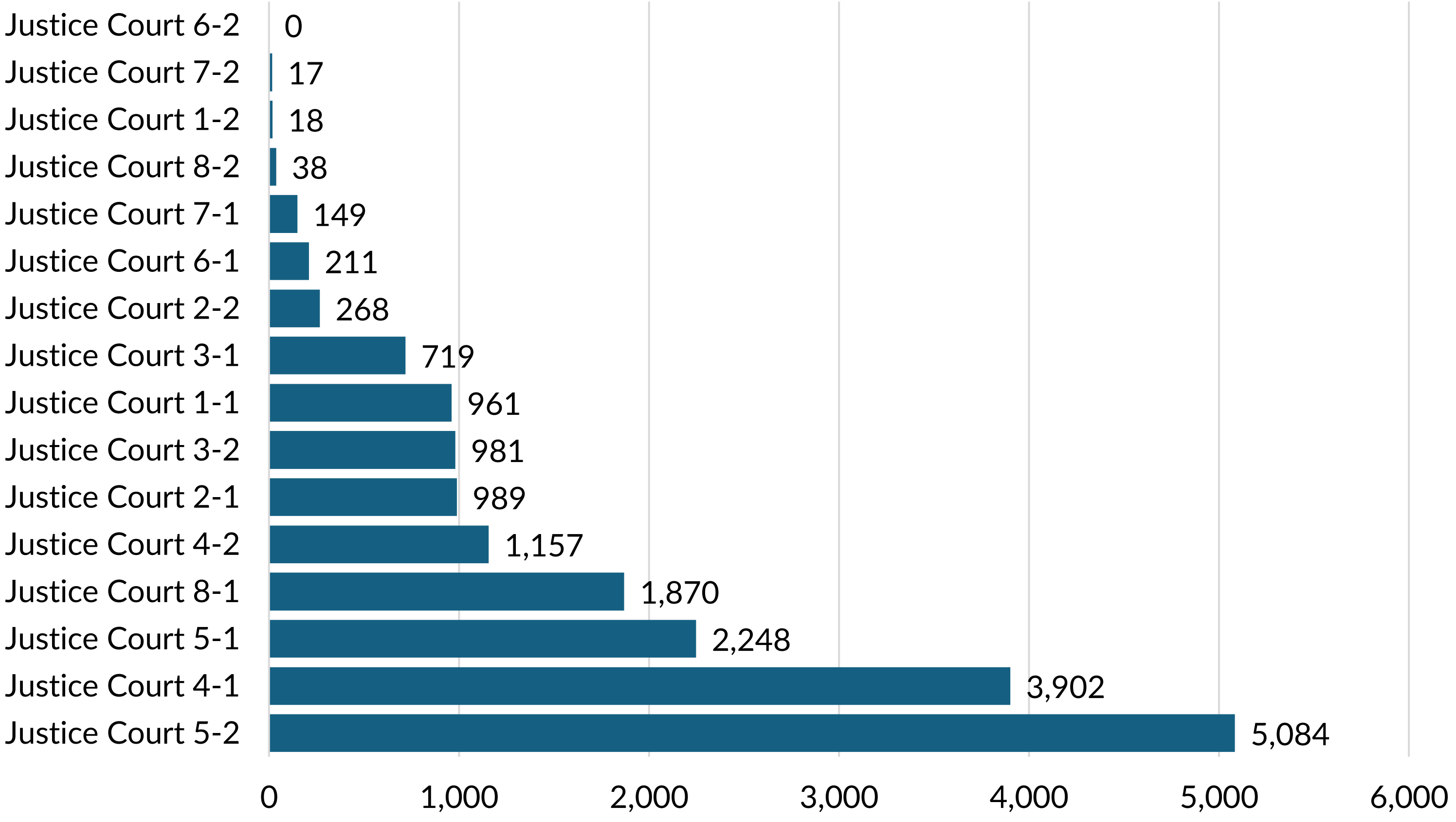
In which courts are turnover receiverships requested?

Turnover receivership requests examined in this study period are concentrated in a small number of courts. There were 18,612 requested during the study period. Justice Court 5-2 hears 27% of all turnover receiver requests in the county.

Of the cases with a judgment, 29% had a turnover receiver request during the study period. Because a judgment can be enforced for 10 years (with the ability to renew), a case filed in 2023 or 2024 could have a turnover receiver appointed beyond this study period.

Justice Courts 5-2, 4-1, and 5-1 received the most requests.

Number of turnover requests filed in each court



Do any courts hear a greater share of turnover receiver requests than they do filings?

There are seven courts that hear a greater share of turnover receiver requests than debt collection filings, with Justice Court 5-2 having the highest difference.

Court	% of filings	% of turnover receiver requests	Difference between filings and requests
Justice Court 5-2	18.0%	27.3%	+9.3%
Justice Court 8-1	6.3%	10.0%	+3.7%
Justice Court 4-1	17.7%	21.0%	+3.3%
Justice Court 5-1	9.0%	12.1%	+3.1%
Justice Court 3-2	3.0%	5.3%	+2.3%
Justice Court 2-1	3.7%	5.3%	+1.6%
Justice Court 8-2	0.1%	0.2%	+0.1%

Can plaintiffs request a turnover receiver in a different court than where they originally filed?

Plaintiffs are allowed to file a motion to appoint a turnover receiver in a different court than where their case was originally heard. This practice can raise concerns of “venue” or “judge” shopping, which is the practice of steering cases toward courts perceived as more favorable to a particular type of request.

We identified potential venue shopping when a turnover receiver filing has no associated judgment, indicating that the underlying case was disposed elsewhere. Of the 18,612 cases with a turnover receiver request, 782 lack a recorded disposition indicating the case was originally filed in another court.

Of all turnover receiver requests that do not have an associated disposition, 99% of these requests were filed in Justice Court 3-2. That means that 773 of Justice Court 3-2’s turnover receiver requests come from cases that were originally heard in other Harris County Justice courts. Of these cases, 742 were filed by SCIL Texas dba Speedy Cash.

While Texas law permits this practice, the scale and concentration we observe warrant closer scrutiny.

Which judgment creditors are requesting turnover receivers?

Just ten companies file 79% of all turnover receivership requests in Harris County justice courts.

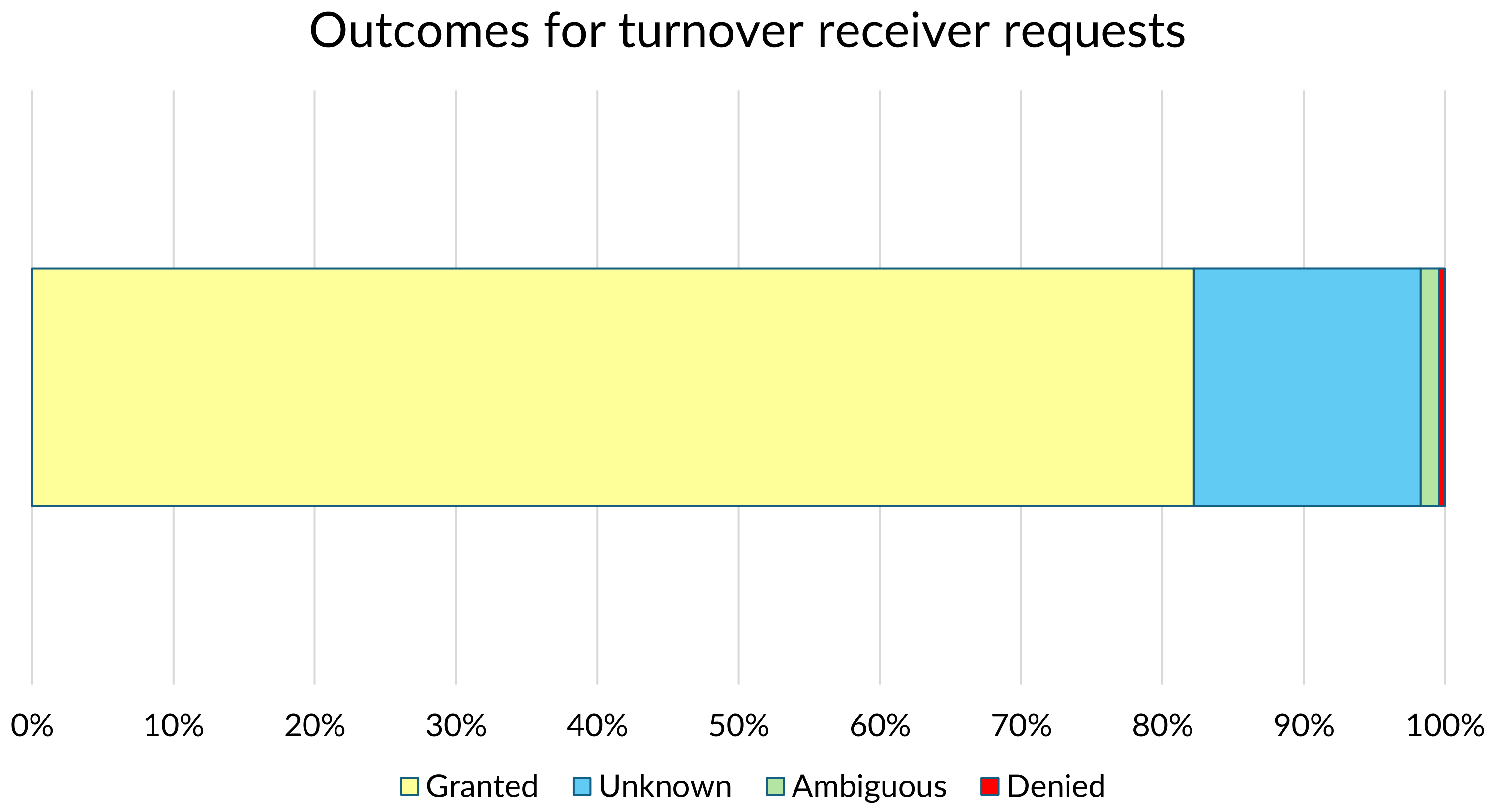
The top ten filers are all national companies: six are debt buyers, three are banks, and one is a payday lender.

Plaintiff	Number of requests	% of total requests
LVNV Funding	3,931	21.1%
Midland Funding	2,582	13.9%
Portfolio Recovery Associates	2,447	13.1%
Calvary SPV I	1,305	7.0%
Discover Bank	1,008	5.4%
SCIL Texas, dba Speedy Cash	957	5.1%
Velocity Investments	772	4.1%
Bank of America	710	3.8%
Synchrony Bank	559	3.0%
Jefferson Capital Systems	420	2.3%

What percentage of turnover receivership requests are granted?

Turnover receivers are most often granted: 82% of requests are approved, 17% are unknown or ambiguous, and **just 0.4% are denied.**

Applications and motions to appoint receivers may be signed without being set for hearing or being placed on a submission docket.



Do judgment creditors request extensions of the turnover receiver period?

Judgment creditors request an extension in 15% of cases, though it's possible that the turnover receiver could be appointed again later to continue collections.

As of May 1, 2022, the Texas Supreme Court limited the initial term of receiverships in justice court to 180 days. However, receivers can request extensions if they show "good cause" which the court defines as "a substantial reason amounting to a legal excuse for needing more time." Some judges issue long-term extensions of the original 180-day order, a practice that appears to conflict with the time limit adopted by the Texas Supreme Court.

Cause No. ________________

______________________________	§	In the Justice Court
Plaintiff (Judgment Creditor)	§	
	§	
	§	
v.	§	Precinct ______
	§	
	§	
______________________________	§	
Defendant (Judgment Debtor)	§	________________ County, Texas

Order Appointing Receiver

The court has considered Judgment Creditor's Application for Appointment of a Receiver under Texas Civil Practice and Remedies Code § 31.002. After reviewing the evidence and the court's file, the court **FINDS** that the judgment rendered in Cause No. ____________________ is valid, final, and fully payable. The judgment awarded was $________________________, including costs, with interest at the rate of _____% to be compounded annually. On __________________ *(date)*, the amount of any credits, payments, and offsets was $________________________.

To identify cases with an extension, we used regular expressions to identify all cases with an event that had the word *"extension"* or *"extend." Screenshot comes from the Texas courts draft order, https://www.txcourts.gov/media/1454134/form-receiver-order.pdf*

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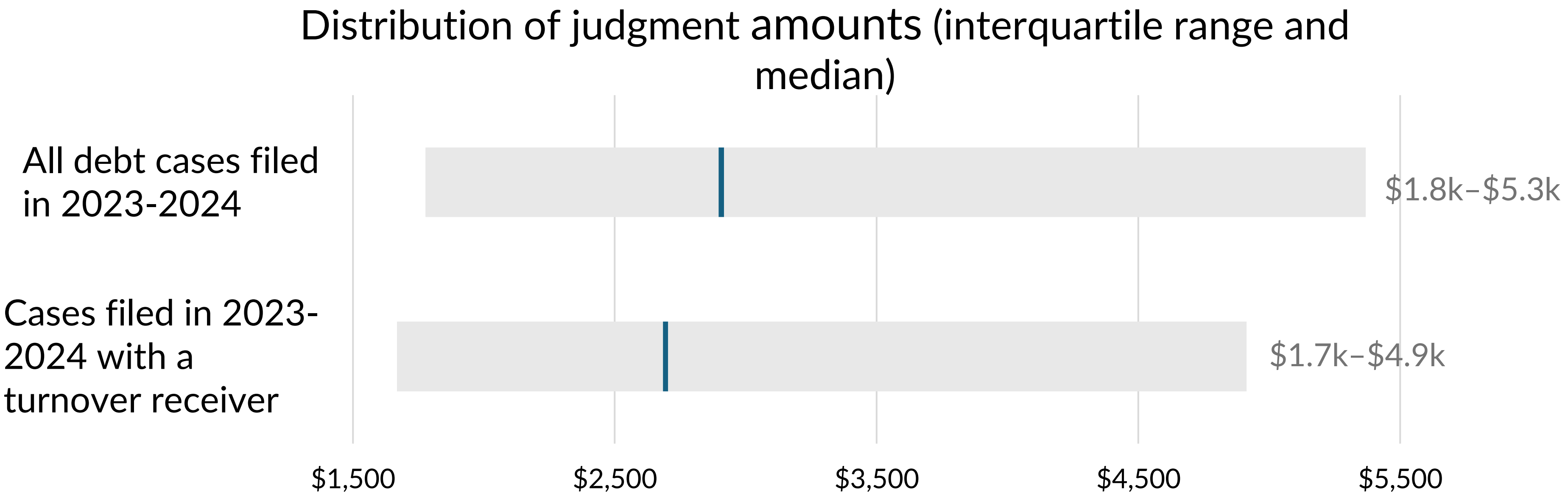
How Does a Turnover Receivership Impact the Amount a Person Sued Must Pay?

Turnover receivers increase what people owe

How much money do judgment debtors owe?

Half of turnover receiver cases involved judgments under $2,684—lower than the $2,897 median for all debt lawsuits in Harris County.

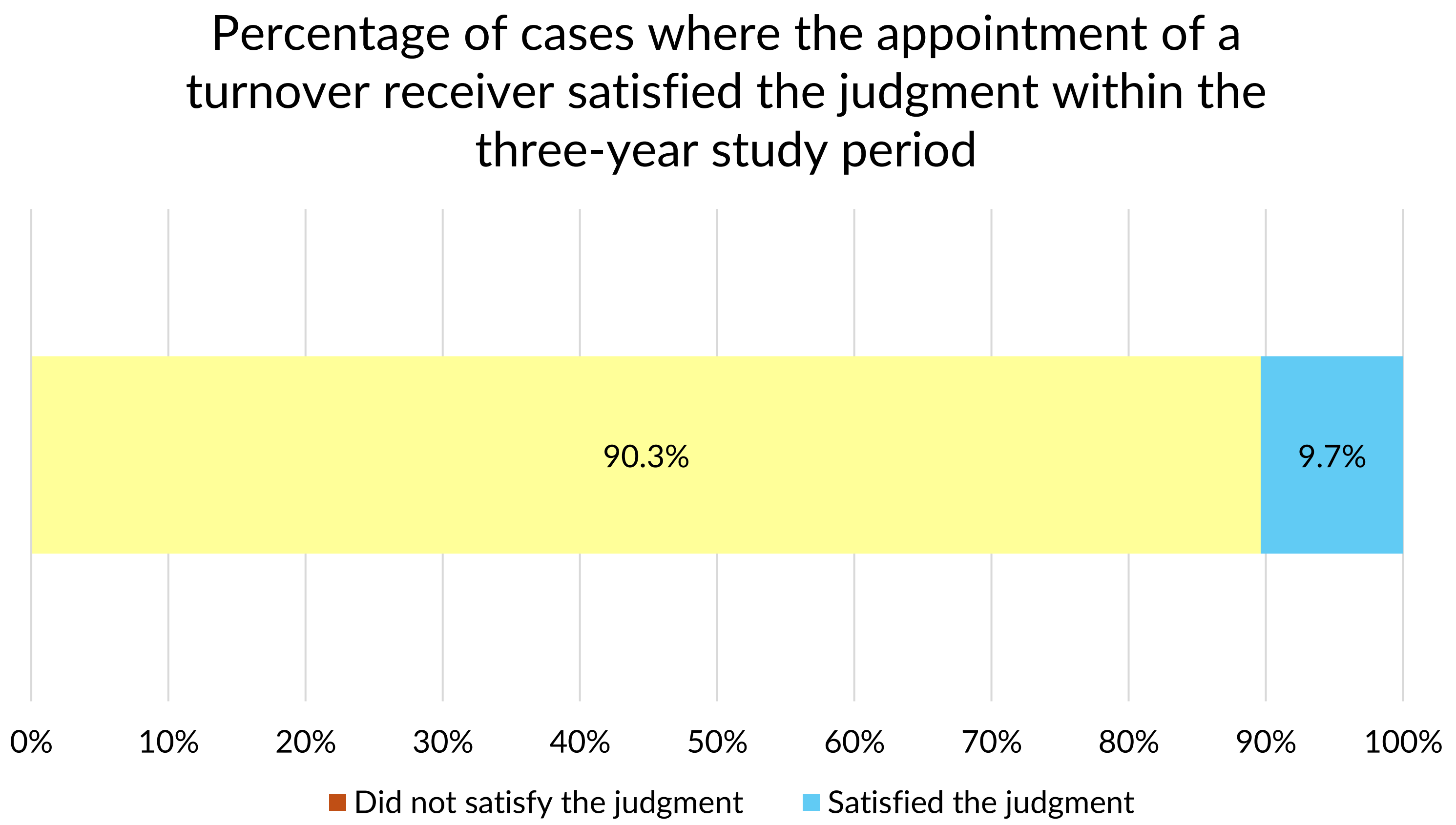
The minimum judgment a turnover receiver was requested for was $177. The jurisdictional limit for cases heard in justice courts is $20,000.



In what percentage of cases does a turnover receivership satisfy a judgment?

During the study period, of cases with a granted receivership, judgment creditors mark 9.7% of cases as satisfied.

For the other 90.3% of cases, a turnover receiver could have recovered some funds,
and collection is likely ongoing.



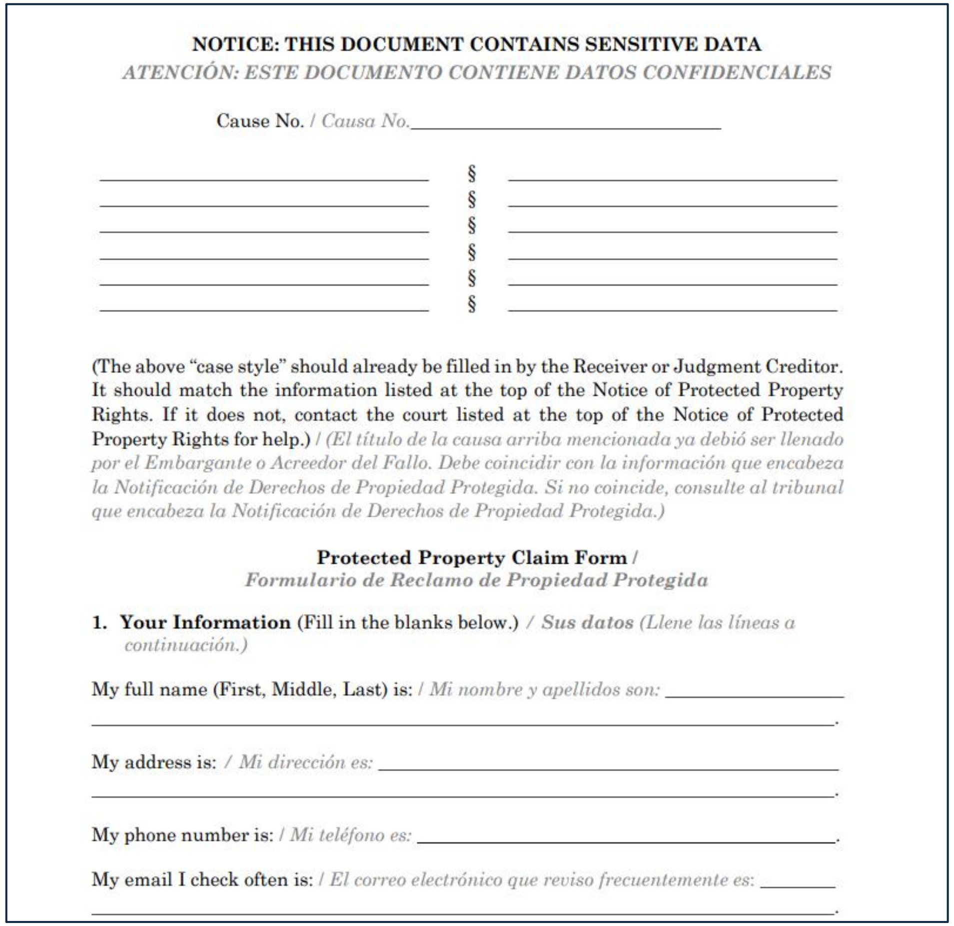
Do judgment debtors request property exemptions?

Just 167 judgment debtors (1.1%) filed a property exemption after a receiver was granted. The low number could be due to a common practice among receivers, where they agree to release some frozen funds as part of a payment plan, but require forfeiture of exemption rights.

Texas lawmakers have created exemptions that protect certain types of property from debt collection such as your homestead, vehicles (one per driver), current wages, child support, and retirement funds.

In addition, individuals can protect up to $50,000—and families up to $100,000—worth of other personal property, including items such as:

- Home furnishings
- Farming and ranching vehicles
- Tools and equipment used for a job
- Jewelry
- 2 firearms
- Livestock and household pets



NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA
ATENCIÓN: ESTE DOCUMENTO CONTIENE DATOS CONFIDENCIALES

Cause No. / *Causa No.*____________________

____________ § ____________
____________ § ____________
____________ § ____________
____________ § ____________
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____________ § ____________

(The above "case style" should already be filled in by the Receiver or Judgment Creditor. It should match the information listed at the top of the Notice of Protected Property Rights. If it does not, contact the court listed at the top of the Notice of Protected Property Rights for help.) / *(El título de la causa arriba mencionada ya debió ser llenado por el Embargante o Acreedor del Fallo. Debe coincidir con la información que encabeza la Notificación de Derechos de Propiedad Protegida. Si no coincide, consulte al tribunal que encabeza la Notificación de Derechos de Propiedad Protegida.)*

Protected Property Claim Form /
Formulario de Reclamo de Propiedad Protegida

1. **Your Information** (Fill in the blanks below.) / ***Sus datos*** *(Llene las líneas a continuación.)*

My full name (First, Middle, Last) is: / *Mi nombre y apellidos son:* ____________.

My address is: / *Mi dirección es:* ____________.

My phone number is: / *Mi teléfono es:* ____________.

My email I check often is: / *El correo electrónico que reviso frecuentemente es:* ____________.

Of closed receiverships, how much does the judgment debtor end up paying?

When a case goes to court, the plaintiff can seek attorney fees, court costs, and pre- and post-judgment interest. Going to court and having a turnover appointed often means the consumer will owe more at the end.

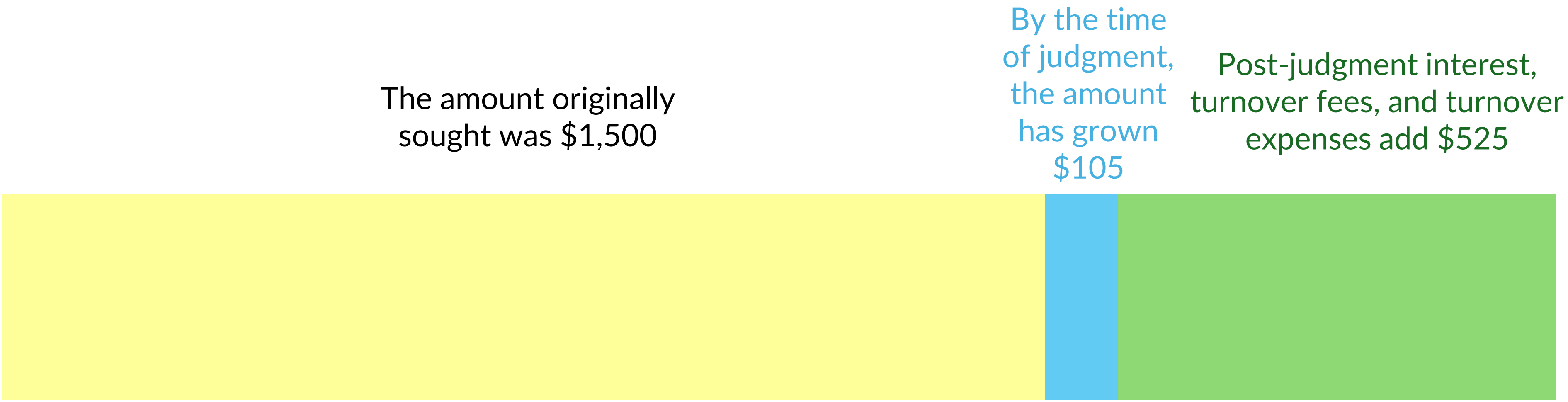
For receiverships with a satisfied judgment, people paid an average of 42% more than the claim amount to repay the debt (which includes the turnover receiver fee, expenses, and post-judgment interest).

Sometimes, judgment creditors will satisfy a judgment for less than the original debt (e.g., if the judgment was for $1,500 and the judgment debtor can only pay $1,200 – they may accept less and mark it satisfied). This happened in 12 of the 331 cases reviewed.

For receiverships with a satisfied judgment (n=331)	Average percent increase	Maximum percent increase
How much the court process added: % change between amount in controversy and judgment amount	7%	28%
How much the post-judgment process added: % change between claim amount and total amount paid	42%	106%

For a $1,500 debt, how much could the judgment debtor end up paying?

Using the averages from the previous slide, a $1,500 debt could turn into $2,130 by the time the debt is satisfied, an increase of $630 over the original debt. In some cases, the amount owed can more than double.



Which turnover receivers are being appointed?

Of the representative sample of closed receiverships, there were four turnover receivers. There are other receivers who operate in Harris County and the state, but they did not show up in the sample.

These four turnover receivers are lawyers. While this study focuses on Harris County, these turnover receivers also operate statewide. Further, none of these four receivers are based in Harris County.

Name of turnover receiver	Appointments	% of total requests
Craig Noack	164	49.5%
Robert E. Jenkins	107	32.3%
Percy T. Beard	35	10.6%
Michael J. Adams	25	7.6%
Total	**331**	**100%**

How much do turnover receivers make?

Turnover receivers typically take 25% of the funds collected as a contingency fee (but can charge more based on "reasonableness"). This fee can lead to people paying hundreds of additional dollars to repay a small debt.

In a sample of 331 satisfied judgments collected by a turnover receiver, the average amount collected for the creditor was $2,448. Added to that was a $689 fee to the receiver, for a total of over $3,100 paid. Among all the cases sampled, $1.04 million was collected, with $228,214 going to turnover receivers and $810,159 going to the creditor.

Fees for receivers averaged 29% of the amount paid to the creditor. The maximum we saw was 33%. Of the 331 cases sampled:

- 192 turnover receivers collected a contingency fee greater than 25% of the amount paid to the creditor,
- 74 collected a fee of 25%, and
- 65 collected a fee less than 25%.

What Can Texas Do?

Texans are facing growing financial stress and a surge in debt lawsuits. Texas has an opportunity to improve a system that exacerbates hardship.

- **Establish a basic cost of living exemption for cash assets.** Currently, when a person's account is frozen by a turnover receiver, people are left with nothing. No money to pay rent or bills. A basic cost of living exemption would make sure that people have some money left in their accounts each month to cover necessities while addressing the debt.
  - For example, 14 states automatically protect a certain dollar amount in the judgment debtor's bank account. The amounts automatically protected range from $300 to $5,000. The National Consumer Law Center recommends a $3,000 protection, which aligns with maximum incomes for a range of Texas public benefits for a family of four.
- **Prohibit venue shopping by judgment creditors.** Require judgment creditors to seek a turnover receiver in the same court where the judgment was issued. This practice is fair and gives the court with the most information about the case authority over post-judgment collections.
- **Ensure that turnover receivers offer fair repayment plans.** Establish affordability standards so that payment amounts are in line with available non-exempt income and prohibit waiver of exemption rights as a condition for a payment plan and unfreezing of account funds.