

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.

JAMES ALDERMAN and JEAN LOSADA,
*on behalf of themselves and
all others similarly situated*

Plaintiffs,

v.

GATESTONE & CO. INTERNATIONAL INC.,
a Delaware Corporation

Defendant.

CLASS ACTION COMPLAINT

1. Plaintiffs, James Alderman and Jean Losada allege violations of the *Fair Debt Collection Practices Act*, 15 U.S.C. §1692 *et seq.* (“FDCPA”).

JURISDICTION AND VENUE

2. This Court has jurisdiction under 28 U.S.C. §1331, and 15 U.S.C. §1692k. Venue in this District is proper because Defendant conducts business in this District.

PARTIES

3. Plaintiff, James Alderman (“Plaintiff Alderman”), is a natural person and citizen of the State of Florida, residing in Indian River County, Florida.

4. Plaintiff, Jean Losada (“Plaintiff Losada”), is a natural person and citizen of the State of Florida, residing in Palm Beach County, Florida.

5. Plaintiff Alderman and Plaintiff Losada herein collectively referred to as “Plaintiffs.”

6. Defendant, Gatestone & Co. International Inc., (“Defendant”), is a Delaware Corporation engaged in the business of collecting consumer debts, which operates from offices located at 1000 N. West Street Suite 1200, Wilmington, Delaware 19801.

7. Defendant regularly uses the United States Postal Service and telephone in the collection of consumer debt.

8. Defendant regularly collects or attempts to collect debts for other parties. Defendant is a “debt collector” as defined in the *FDCPA*.

9. At all times material to the allegations of this complaint, Defendant was acting as a debt collector with respect to the collection of Plaintiffs’ alleged debts.

FACTUAL ALLEGATIONS

10. Defendant sought to collect from Plaintiffs an alleged debt incurred by Plaintiffs for personal, family, or household purposes; more specifically, the debts at issue were delinquent credit card debts.

11. On or about August 6, 2016, Defendant sent a demand letter to Plaintiff Alderman that sought to collect an alleged debt due to Bank of America, N.A. for an account whose number ended in 4901. (The “Demand Letter 1”). Attached hereto as “Exhibit 1.”

12. On or about August 6, 2016, Defendant sent a demand letter to Plaintiff Alderman that sought to collect an alleged debt due to Bank of America, N.A. for an account whose number ended in 4095. (The “Demand Letter 2”). Attached hereto as “Exhibit 2.”

13. On or about March 11, 2016, Defendant sent a demand letter to Plaintiff Losada that sought to collect an alleged debt due to BMO Harris Bank, N.A. for an account whose number ended in 7090. (The “Demand Letter 3”). Attached hereto as “Exhibit 3.”

14. Demand Letter 1, Demand Letter 2, and Demand Letter 3 are herein collectively referred to as the "Demand Letters."

15. The Demand Letters were Defendant's initial communication with Plaintiffs with respect to the debts alleged therein.

16. The Defendant's Demand Letters stated in part:

If you notify this office in writing within 30 days after receiving this notice, this office will: obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification.

XXXX

Please make sure that your payment clearly identifies your name and that of your creditor so that payment can be properly applied to your account. All payments mailed to this office should be payable to Gatestone & Co. International Inc.

Online check payments can be made on our website at www.gatestoneco.com[.]

17. Pursuant *15 U.S.C §1692g(a)* Defendant must provide Plaintiffs with:

Validation of debts.

(a) Notice of debt; contents

Within five days after the initial communication with a consumer in connection with the collection of any debt, a debt collector shall, unless the following information is contained in the initial communication or the consumer has paid the debt, send the consumer a written notice containing-

(1) the amount of the debt;

(2) the name of the creditor to whom the debt is owed;

(3) a statement that unless the consumer, within thirty days after receipt of the notice, disputes the validity of the debt, or any portion thereof, the debt will be assumed to be valid by the debt collector;

- (4) **a statement that if the consumer notifies the debt collector in writing within the thirty-day period that the debt, or any portion thereof, is disputed, the debt collector will obtain verification of the debt or a copy of a judgment against the consumer and a copy of such verification or judgment will be mailed to the consumer by the debt collector; and**
- (5) a statement that, upon the consumer's written request within the thirty-day period, the debt collector will provide the consumer with the name and address of the original creditor, if different from the current creditor.

(emphasis added)

18. *15 U.S.C. § 1692e(10)* states:

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

XXXX

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.

19. Defendant's Demand Letters falsely and misleadingly pronounce the verification rights of Plaintiffs provided by *15 U.S.C. § 1692g*. Defendant's statement "If you notify this office in writing within 30 days after receiving this notice, this office will: obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification." omits that the Plaintiffs written notification must dispute the debt or any portion thereof as stated in *15 U.S.C. § 1692g(4)*.

20. In addition, Defendant's statement "If you notify this office in writing within 30 days after receiving this notice, this office will: obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification." is misleading and confusing as it is subject to more than one interpretation. Defendant's statement does not inform the Plaintiffs

of what they need to notify Defendant's office of, i.e. that they need to dispute the debt or any portion thereof, as opposed to, for example, writing to notify the Defendant that the consumer cannot afford to make any payment on the debt.

21. Any potential *bona fide* error defense which relies upon Defendant's mistaken interpretation of the legal duties imposed upon it by the *FDCPA* would fail as a matter of law.

CLASS ACTION ALLEGATIONS
AS TO DEFENDANT

22. This action is brought on behalf of a Class consisting of (i) all persons with addresses in the State of Florida (ii) to whom letters that contained the language: "If you notify this office in writing within 30 days after receiving this notice, this office will: obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification." (iii) were mailed, delivered or caused to be served by the Defendant (iv) that were not returned undeliverable by the U.S. Post Office (v) in an attempt to collect a debt incurred for personal, family, or household purposes (vi) during the one-year period prior to the filing of the original Complaint in this action through the date of certification.

23. Plaintiffs allege on information and belief based upon the Defendant's use of the phrase: "If you notify this office in writing within 30 days after receiving this notice, this office will: obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification." in its letters served upon the Class is so numerous that joinder of all members of the Class is impractical.

24. There are questions of law or fact common to the Class, which common issues predominate over any issues involving only individual Class members. The factual issue common to each Class member is that each was served with a letter by Defendant that contained the phrase: "If you notify this office in writing within 30 days after receiving this notice, this office will: obtain

verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification.” The common principal legal issue is whether Defendant’s wording violated the *FDCPA* by misleading the least sophisticated consumer to believe that they were being given the correct validation notice required by *15 U.S.C. §1692g* after an “initial communication” by a debt collector.

25. Plaintiffs’ claims are typical of those of the Class members. All are based on the same facts and legal theories.

26. Plaintiffs will fairly and adequately protect the interests of the Class. They have retained counsel experienced in handling actions involving unlawful practices under the *FDCPA* and Class actions. Neither Plaintiffs nor their counsel have any interests which might cause them not to vigorously pursue this action.

27. Certification of the Class under *Rule 23(b)(3)* of the *Federal Rules of Civil Procedure* is also appropriate in that:

(1) The questions of law or fact common to the members of the class predominate over any questions affecting an individual member.

(2) A class action is superior to other available methods for the fair and efficient adjudication of the controversy.

28. Plaintiffs request certification of a Class under *Rule 23(b)(3)*, of the *Federal Rules of Civil Procedure*, for monetary damages; their appointment as Class Representatives; and that their attorney Leo W. Desmond be appointed Class Counsel.

COUNT I

VIOLATION OF 15 U.S.C. § 1692g(a)(4) **CLASS CLAIM AGAINST DEFENDANT**

29. Plaintiffs incorporate Paragraphs 1 through 21.

30. *15 U.S.C. §1692g(a)(4)* states after an initial communication the Defendant must provide Plaintiffs with:

(4) [A] a statement that if the consumer notifies the debt collector in writing within the thirty-day period that the debt, or any portion thereof, is disputed, the debt collector will obtain verification of the debt or a copy of a judgment against the consumer and a copy of such verification or judgment will be mailed to the consumer by the debt collector; and

31. Defendant sent the Demand Letters to Plaintiffs on behalf of Plaintiffs' creditors in an attempt to collect a consumer debt, namely to collect alleged debts due to Plaintiffs' various credit card accounts.

32. By claiming to have given Plaintiffs the information required by the *FDPCA*, Defendant has attempted to mislead Plaintiffs and the Class into believing that each Demand Letter contained the proper validation notice required under the *Fair Debt Collection Practices Act*.

33. Defendant's Demand Letters omit that the consumer, in order to receive the benefits provided by *15 U.S.C. § 1692g(a)(4)*, must specifically dispute the debt or any portion thereof.

34. Defendant's statement in its Demand Letters only state that the Plaintiffs need to notify Defendant's office, however it does not inform the Plaintiffs of what they need to "notify" Defendant's office of, i.e. that the consumer needs to dispute the amount of the debt to receive verification of the debt or a copy of a judgment if one exists.

35. Defendant's statement "If you notify this office in writing within 30 days after receiving this notice, this office will: obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification." could mislead the least sophisticated consumer to believe that he or she could notify Defendant's office in writing of their inability to pay the debt or to request a payment plan and the Defendant would send the consumer verification

of the debt pursuant to the statute, and while not stated, invoke the protections afforded to consumers by *15 U.S.C. § 1692g(b)*.

36. As a result of Defendant's conduct, Plaintiffs and the Class are entitled to an award of statutory damages pursuant to *15 U.S.C. §1692k*.

37. As a result of Defendant's conduct, Plaintiffs and the Class are entitled to an award of costs and attorney fees pursuant to *15 U.S.C. §1692k*.

COUNT II

VIOLATION OF 15 U.S.C. § 1692e **CLASS CLAIM AGAINST DEFENDANT**

38. Plaintiffs re-allege Paragraphs 1 through 21 and Paragraphs 30 through 35.

39. *15 U.S.C. § 1692e* states:

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

xxxx

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.

40. Defendant sent the Demand Letters to Plaintiffs on behalf of Plaintiffs' creditors in an attempt to collect a consumer debt, namely to collect alleged debts due to Plaintiffs' various credit card accounts.

41. By claiming to have given Plaintiffs the information required by the *FDPCA*, Defendant has attempted to mislead Plaintiffs and the Class into believing that the Demand Letter contained the proper validation notice required under the *Fair Debt Collection Practices Act*.

42. Defendant's Demand Letters omit that the consumer may dispute any portion of the debt in writing despite the clear wording of *15 U.S.C. §1692g(a)(4)*.

43. Defendant's Demand Letter is a misstatement of *15 U.S.C. § 1692g(a)(4)* that would be confusing and misleading to the least sophisticated consumer with regard to his/her legal rights as it omits that the Plaintiffs and the Class must dispute the debt or any portion thereof in order to receive verification of the debt as well as the protections available pursuant to *15 U.S.C. § 1692g(b)*.

44. Defendant's statement in its Demand Letters only states that the Plaintiffs need to notify Defendant's office, however it does not inform the Plaintiffs of what they need to notify Defendant's office of, i.e. that the consumer needs to dispute the amount of the debt to receive verification of the debt or a copy of a judgment if one exists.

45. Defendant's statement "If you notify this office in writing within 30 days after receiving this notice, this office will: obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification." could mislead the least sophisticated consumer to believe that he or she could notify Defendant's office in writing of their inability to pay the debt or to request a payment plan and the Defendant would send the consumer verification of the debt. Defendant's statement is susceptible to more than one interpretation.

46. As a result of Defendant's conduct, Plaintiffs and the Class are entitled to an award of statutory damages pursuant to *15 U.S.C. §1692k*.

47. As a result of Defendant's conduct, Plaintiffs and the Class are entitled to an award of costs and attorney's fees pursuant to *15 U.S.C. §1692k*.

WHEREFORE, Plaintiffs request that the Court enter judgment in their favor against Defendant for:

- a. An Order certifying this matter as a Class action and appointment of Plaintiffs as Class Representatives as to all claims against Defendant;

- b. An Order appointing Leo W. Desmond as Class Counsel;
- c. An award of statutory damages for Plaintiffs and the Class pursuant to *15 U.S.C. §1692k* for all Class claims;
- d. An award of attorney's fees, litigation expenses and costs of the instant suit; and
- e. Such other or further relief as the Court deems proper.

Dated: December 7, 2016.

Respectfully submitted,

DESMOND LAW FIRM, P.C.

/s/ Leo W. Desmond
LEO W. DESMOND, ESQ.
Florida Bar No. 0041920
5070 Highway A1A
Suite D
Vero Beach, FL 32963
Telephone: 772-231-9600
Facsimile: 772-231-0300
lwd@verobeachlegal.com

SOVATHARY K. JACOBSON, ESQ.
Florida Bar No. 102200
5070 Highway A1A
Suite D
Vero Beach, FL 32963
Telephone: 772-231-9600
Facsimile: 772-231-0300
jacobson@verobeachlegal.com
Attorneys for Plaintiffs

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

(a) PLAINTIFFS JAMES ALDERMAN, & JEAN LOSADA DEFENDANTS GATESTONE & CO. INTERNATIONAL INC.

(b) County of Residence of First Listed Plaintiff Indian River County of Residence of First Listed Defendant (EXCEPT IN U.S. PLAINTIFF CASES) (IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address, and Telephone Number) Attorneys (If Known) DESMOND LAW FIRM, P.C. 5070 A1A, SUITE D, VERO BEACH, FL 32963

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

I. BASIS OF JURISDICTION (Place an "X" in One Box Only) III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff, and One Box for Defendant) U.S. Government Plaintiff/Federal Question U.S. Government Defendant/Diversity Citizen of This State/Citizen of Another State/Citizen or Subject of a Foreign Country PTF DEF 1 1 2 2 3 3 4 4 5 5 6 6

V. NATURE OF SUIT (Place an "X" in One Box Only) CONTRACT REAL PROPERTY PERSONAL INJURY CIVIL RIGHTS TORTS PRISONER PETITIONS FORFEITURE/PENALTY LABOR IMMIGRATION BANKRUPTCY SOCIAL SECURITY FEDERAL TAX SUITS OTHER STATUTES

VI. ORIGIN (Place an "X" in One Box Only) 1 Original Proceeding 2 Removed from State Court 3 Re-filed (See VI below) 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation 7 Appeal to District Judge from Magistrate Judgment 8 Remanded from Appellate Court

VI. RELATED/RE-FILED CASE(S) (See instructions): a) Re-filed Case YES NO b) Related Cases YES NO JUDGE DOCKET NUMBER

VII. CAUSE OF ACTION Fair Debt Collection Practices Act 15 U.S.C. 1692 et al LENGTH OF TRIAL via 7 days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ 500,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE SIGNATURE OF ATTORNEY OF RECORD DATE December 7, 2106

FOR OFFICE USE ONLY RECEIPT # AMOUNT IFP JUDGE MAG JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I. (a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Refiled (3) Attach copy of Order for Dismissal of Previous case. Also complete VI.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

Remanded from Appellate Court. (8) Check this box if remanded from Appellate Court.

VI. Related/Refiled Cases. This section of the JS 44 is used to reference related pending cases or re-filed cases. Insert the docket numbers and the corresponding judges name for such cases.

VII. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.**

Example: U.S. Civil Statute: 47 USC 553

Brief Description: Unauthorized reception of cable service

VIII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

Date and Attorney Signature. Date and sign the civil cover sheet.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

JAMES ALDERMAN & JEAN LOSADA, on behalf of themselves and all others similarly situated,

Plaintiff(s)

v.

GATESTONE & CO. INTERNATIONAL INC. a Delaware Corporation

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) GATESTONE & CO. INTERNATIONAL INC. C/O C T CORPORATION SYSTEM 1200 SOUTH PINE ISLAND ROAD PLANTATION, FL 33324

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

DESMOND LAW FIRM, P.C. LEO W. DESMOND, ESQ. 5070 HIGHWAY A1A, SUITE D VERO BEACH, FL 32963

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

P.O. Box 101928
Case 2:16-cv-14541-RLR Document 1-3 Entered on FLSD Docket 12/07/2016 Page 1 of 1
Dep. 4947A
Birmingham, AL 35210-1928

002413



GATESTONE

Visit our website: www.gatestoneco.com
800-678-3052
Our hours of operation are
Mon - Thu 8:00am to 11:00pm EST
Fri, 8:00am to 5:00pm and Sat 9:00am to 2:00pm EST

Date: August 06, 2016
Reference #: BAM 71-076275531
Creditor: Bank of America, N.A.
Account #: XXXXXXXXXXXX4901
Amount Owing: 7,050.73



15 - 65163-8A
James M Alderman
1408 25th Ave
Vero Beach, FL 32960-3266



Dear Sir/Mme:

Your account has been placed by Bank of America with Gatestone & Co. International Inc., a collection agency. This communication from a debt collector is an attempt to collect a debt and any information obtained will be used for that purpose. Calls to or from our company may be monitored or recorded for quality assurance purposes.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of the debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days after receiving this notice, this office will: obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

Should you have any questions concerning your payment or your account, please telephone our office. Please make sure that your payment clearly identifies your name and that of your creditor so that payment can be properly applied to your account. All payments mailed to this office should be payable to Gatestone & Co. International Inc.

Online check payments can be made on our website at www.gatestoneco.com with the use of this security feature code 727220.

MR. LEN MANGOS
(800) 445-6367

Please Detach and Return This Portion with Payment

Option 1: Make Check Payable to: Gatestone & Co. International Inc.
Option 2: Pre-Authorized — Auto Pay []

Routing No. _____
Name of Bank _____
Check No. _____
Account No. _____
Name of Account Holder _____
Signature _____
Payment Amount \$ _____



James M Alderman
1408 25th Ave
Vero Beach, FL 32960-3266

Reference #: BAM 71-076275531
Company: Gatestone & Co. International Inc. (Loc.71)



Gatestone & Co. International Inc.
1000N. West Street, Suite 1200
Wilmington, DE 19801

By mailing your check you authorize Gatestone & Co. International Inc. to debit your account, one time for the amount of the check, via an electronic funds transfer (EFT). Funds may be withdrawn from your account as soon as the same day payment is received.

00002413

UK

P.O. Box 101928
Dept 4947A
Birmingham, AL 35210-1928



002412

 <h1 style="margin: 0;">GATESTONE</h1>
<p>Visit our website: www.gatestoneco.com 800-678-3052</p> <p>Our hours of operation are Mon - Thu 8:00am to 11:00pm EST Fri, 8:00am to 5:00pm and Sat 9:00am to 2:00pm EST</p>
<p>Date: August 06, 2016 Reference #: BAM 71-076275421 Creditor: Bank of America, N.A. Account #: XXXXXXXXXXXXX4095 Amount Owing: 3,193.89</p>



15 - 65163-8A
James M Alderman
1408 25th Ave
Vero Beach, FL 32960-3266



Dear Sir/Mme:

Your account has been placed by Bank of America with Gatestone & Co. International Inc., a collection agency. This communication from a debt collector is an attempt to collect a debt and any information obtained will be used for that purpose. Calls to or from our company may be monitored or recorded for quality assurance purposes.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of the debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days after receiving this notice, this office will: obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

Should you have any questions concerning your payment or your account, please telephone our office. Please make sure that your payment clearly identifies your name and that of your creditor so that payment can be properly applied to your account. All payments mailed to this office should be payable to Gatestone & Co. International Inc.

Online check payments can be made on our website at www.gatestoneco.com with the use of this security feature code 727220.

MR. LEN MANGOS
(800) 445-6367

Please Detach and Return This Portion with Payment

Option 1: Make Check Payable to: Gatestone & Co. International Inc.
 Option 2: Pre-Authorized --- Auto Pay []
 Routing No. _____
 Name of Bank _____
 Check No. _____
 Account No. _____
 Name of Account Holder _____
 Signature _____
 Payment Amount \$ _____



James M Alderman
1408 25th Ave
Vero Beach, FL 32960-3266

Reference #: BAM 71-076275421
Company: Gatestone & Co. International Inc. (Loc.71)



Gatestone & Co. International Inc.
1000N. West Street, Suite 1200
Wilmington, DE 19801

By mailing your check you authorize Gatestone & Co. International Inc. to debit your account, one time for the amount of the check, via an electronic funds transfer (EFT). Funds may be withdrawn from your account as soon as the same day payment is received.

00002412

1000 N. West Street
Suite 1200
Wilmington, DE 19801



000009

GATESTONE

Visit our website: www.gatestoneco.com
800-678-3052

Our hours of operation are
Mon - Thu 8:00am to 11:00pm EST
Fri, 8:00am to 5:00pm and Sat 8:00am to 2:00pm EST



1 - 60178-14E
Jean Losada
9325 NW 5th Ave
Miami, FL 33150-2127

Date: March 11, 2016
Reference #: BMO 71-160710005
Creditor: BMO HARRIS BANK N.A. (DINERS CLUB) COMM
Account #: 7721-00001196992
Previous Account # *****57090
Amount Owing: 4,267.72



Dear Sir/Mme:

Your account has been placed with Gatestone & Co. International Inc., a collection agency. This communication from a debt collector is an attempt to collect a debt and any information obtained will be used for that purpose. Calls to or from our company may be monitored or recorded for quality assurance purposes.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of the debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days after receiving this notice, this office will: obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

Should you have any questions concerning your payment or your account, please telephone our office. Please make sure that your payment clearly identifies your name and that of your creditor so that payment can be properly applied to your account. All payments mailed to this office should be payable to Gatestone & Co. International Inc.

Online check payments can be made on our website at www.gatestoneco.com with the use of this security code 192765.

MS. ANNA DONNELLY
(866) 653-6252

Please Detach and Return This Portion with Payment

Jean Losada
9325 NW 5th Ave
Miami, FL 33150-2127



Option 1: Make Check Payable to: Gatestone & Co. International Inc.
Option 2: Pre-Authorized — Auto Pay []
Routing No. _____
Name of Bank _____
Check No. _____
Account No. _____
Name of Account Holder _____
Signature _____
Payment Amount \$ _____



Gatestone & Co. International Inc.
1000N. West Street, Suite 1200
Wilmington, DE 19801

Reference #: 71-160710005
Company: Gatestone & Co. International Inc.

By mailing your check you authorize Gatestone & Co. International Inc. to debit your account, one time for the amount of the check, via an electronic funds transfer (EFT). Funds may be withdrawn from your account as soon as the same day payment is received. In the event your check is returned unpaid for insufficient or uncollected funds, we may re-present your check. Your check will not be returned by your financial institution.

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ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Gatestone & Co. International Named in Third FDPCA Class Action](#)
