

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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MICHELE CAMPBELL, on behalf of herself and all  
others similarly situation,

Plaintiff

**CLASS ACTION  
COMPLAINT**

1:17-cv-1111 (BKS/DJS)

-against-

I.C. SYSTEM, INC.,

Defendant

-----X

**PRELIMINARY STATEMENT**

1. The Plaintiff MICHELE CAMPBELL (“Plaintiff”) brings this lawsuit based upon improper and violative debt collection practices utilized and otherwise invoked by the above-named Defendant. These collection practices are expressly prohibited by the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692 *et seq.*
2. Based upon the Defendant’s violations of the FDCPA, as set forth and alleged herein, the Plaintiff, and the class she seeks to represent, are entitled to statutory damages, attorneys fees, and costs, all pursuant to 15 U.S.C. § 1692k.

### **PARTIES**

3. The Plaintiff is a natural person.
4. At all times relevant to this Complaint, the Plaintiff was a citizen of, and otherwise resided in, Saratoga County, New York.
5. The Defendant I.C. System, Inc. (“IC”), is a corporate debt collection entity and maintains a principle place of business located at 444 Highway 96 East, St. Paul, Minnesota.
6. The Defendant collects, and attempts to collect, debts incurred, or alleged to have been incurred, for personal, family, or household purposes on behalf of creditors using the U.S. Mail, telephone, and Internet.
7. The Defendant is a “debt collector” as that term is defined by 15 U.S.C. § 1692a(6)

### **JURISDICTION & VENUE**

8. Jurisdiction of this Court arises under 15 U.S.C. § 1692k(d) and 28 U.S.C. § 1331.
9. Venue is appropriate in this federal district pursuant to 28 U.S.C. §1391(b) because a substantial part of the events giving rise to the claims of the Plaintiff occurred within this federal judicial district.

### **FACTS CONCERNING THE PLAINTIFF**

10. The Plaintiff is alleged by the Defendant to be indebted to an entity doing business as Northway Animal Emergency Clinic (NAEC) for a debt which was incurred for personal purposes.
11. The monetary obligation alleged to be owed by the Plaintiff is a “debt” as that term is defined in the FDCPA, 15 U.S.C. § 1692a(5).
12. The Plaintiff is a “consumer” as that term is defined in the FDCPA, 15 U.S.C. § 1692a(3).
13. At a time unknown to the Plaintiff the alleged debt went into default and was referred to the Defendant IC for collection purposes.
14. In the attempt to collect the alleged debt from the Plaintiff, the Defendant sent two identical letters to the Plaintiff.
15. One letter is dated January 11, 2017 and the other letter is dated February 17, 2017. A copy of each said letter is attached hereto as Exhibit “1” and incorporated by reference herein.
16. The letter is a standard form computer generated letter which was drafted by persons whose identity(ies) presently unknown by the Plaintiff and otherwise utilized by the Defendant in its normal course of business.
17. The Defendant’s form letter states (in part):

If you fail to contact us to discuss payment of this account, our client has authorized us to pursue additional remedies to recover the balance due, including referring the account to an attorney.

Interest at the rate of 16% annually is being accrued by I.C. System, Inc. as of 9/13/2016.

Please pay this account today or immediately contact us to make payment arrangements.

18. The statements set forth in the collection letter constitute false, deceptive and misleading assertions designed to confuse and mislead the least sophisticated consumer.
19. Although the form letter states that the Plaintiff's account would be forwarded to an attorney by the Defendant, no such referral was ever intended based upon the de minimis amount of the debt, which allegedly totaled \$488.23 as said amount is set forth in the February 17, 2017 letter sent by the Defendant to the Plaintiff.
20. The statement concerning the accrual of interest by the Defendant is deceptive and misleading as the statement does not disclose whether the interest accrual constitutes a collection fee or whether the alleged interest accrual is due and owing to the creditor NAEC.
21. The command to contact the Defendant "immediately" constitutes an overall false sense of urgency including in regard to creating the false impression that the Plaintiff's alleged debt would be imminently referred to an attorney unless the Plaintiff contacted the Defendant and made arrangements for payment of the alleged debt.
22. The false, deceptive and misleading statements set forth in the Defendant's collection letter are material in that said statements affect the least sophisticated consumer's decision and/or ability to pay and/or challenge an alleged debt.

### **CLASS ALLEGATIONS**

23. This action is brought as a class action. Plaintiff brings this action on behalf of herself and on behalf of all other persons similarly situated pursuant to Rule 23 of the Federal Rules of Civil Procedure.

24. This claim is brought on behalf of a class consisting of:
  - a. all persons, with addresses in the State of New York, who, within a time period commencing from one year prior to the date of the filing of the Complaint received a collection communication from the Defendant IC which is identical in content and form to the computer generated collection communications sent to the Plaintiff (Exhibit “1” hereto).
25. The identities of all class members are readily ascertainable from records maintained by the Defendant.
26. Excluded from the class defined heretofore herein are the Defendant and all officers, members, partners, managers, directors, and employees of the Defendant and their respective immediate families, and legal counsel for all parties to this action and all members of their immediate families.
27. There are questions of law and fact common to the class, which common issues predominate over any issues involving only individual class members.
28. The Plaintiff’s claims are typical of the class members, as all are based upon the same facts and legal theories.
29. The Plaintiff will fairly and adequately protect the interests of the class defined in this Complaint. The Plaintiff has retained counsel with experience in handling consumer lawsuits, complex legal issues, and class actions, and neither the Plaintiff nor his attorney has any interests, which might cause them not to vigorously pursue this action.
30. This action has been brought, and may properly be maintained, as a class action pursuant to the provisions of Rule 23 of the Federal Rules of Civil Procedure:
  - (a) **Numerosity:** The Plaintiff is informed and believes, and on that basis alleges, that

the class defined above is so numerous that joinder of all members of the class would be impractical.

31. **Common Questions Predominate:** Common questions of law and fact exist as to all members of the class and those questions predominate over any questions or issues involving only individual class members. The principal issues are whether the Defendant IC utilized false, deceptive and misleading debt collection means in the attempts to collect alleged personal debts.

(c) **Typicality:** The Plaintiff's claims are typical of the claims of the class members. Plaintiff and all members of the class have claims arising out of the Defendant's common uniform course of conduct complained of herein.

(d) **Adequacy:** The Plaintiff will fairly and adequately protect the interests of the class members insofar as Plaintiff has no interests that are adverse to the absent members of the class. The Plaintiff is committed to vigorously litigating this matter. Plaintiff has also retained counsel experienced in handling consumer lawsuits, complex legal issues, and class actions. Neither the Plaintiff nor her counsel has any interests which might cause them not to vigorously pursue the instant class action lawsuit.

(e) **Superiority:** A class action is superior to the other available means for the fair and efficient adjudication of this controversy because individual joinder of all members would be impracticable. Class action treatment will permit a large number of similarly situated persons to prosecute their common claims in a single forum efficiently and without unnecessary duplication of effort and expense that individual actions would engender.

- (f) Certification of the class under Rule 23(b)(3) of the Federal Rules of Civil Procedure is also appropriate in that the questions of law and fact common to members of the class predominate over any questions affecting any individual member of the class, and a class action is superior to other available methods for the fair and efficient adjudication of the controversy.

### **FIRST CAUSE OF ACTION**

#### **VIOLATION OF THE FAIR DEBT COLLECTION PRACTICES ACT**

32. The Defendant violated the FDCPA. The Defendant's violations include, but are not limited to, the following:

The Defendant violated 15 U.S.C. § 1692e by using false, deceptive and misleading debt collection means during attempts to collect alleged consumer debts;

The Defendant violated 15 U.S.C. § 1692e(2)(A) by misrepresenting the character and legal status of alleged consumer debts;

The Defendant violated 15 U.S.C. § 1692e(5) by threatening unintended legal action in conjunction with alleged consumer debts.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff requests that the Court enter judgment in favor of the Plaintiff and the class as set forth below:

- (i) The maximum statutory damages for himself and the class as are allowed pursuant to 15 U.S.C. § 1692k(a)(2)(A);

- (ii) Attorney's fees, litigation expenses, and costs pursuant to 15 U.S.C. § 1692k(a)(B)(3); and
- (iii) For such other and further relief as may be just and proper.

**JURY DEMAND**

Plaintiff demands that this case be tried before a Jury.

DATED: New York, New York  
September 28, 2017

ROBERT L. ARLEO, ESQ. P.C.

By: /s/ Robert L. Arleo  
ROBERT L. ARLEO  
380 Lexington Avenue  
17<sup>th</sup> Floor  
New York, New York 10168  
PHONE (212) 551-1115  
FAX: (518) 751-1801  
Email: [robertarleo@gmail.com](mailto:robertarleo@gmail.com)  
Attorney for the Plaintiff







P.O. Box 64437  
St. Paul, MN 55164-0437

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January 11, 2017



Michele Campbell  
[Redacted]

| ACCOUNT SUMMARY                      |                                  |
|--------------------------------------|----------------------------------|
| Creditor:                            | Northway Animal Emergency Clinic |
| Account No:                          | [Redacted]                       |
| I.C. System Reference No:            | [Redacted]                       |
| Principal Due:                       | \$439.27                         |
| Interest Before 9/13/2016 Due:       | \$19.87                          |
| Interest Since 9/13/2016 Due:        | \$17.30                          |
| <b>BALANCE DUE:</b>                  | <b>\$476.44</b>                  |
| \$0.00 has been Paid Since Placement |                                  |

Michele Campbell:

We have contacted you several times regarding the balance stated in the account summary, which remains unpaid.

Our office has reported this debt to credit reporting agencies and you have the right to inspect those credit files in accordance with federal law.

If you fail to contact us to discuss payment of this account, our client has authorized us to pursue additional remedies to recover the balance due, including referring the account to an attorney.

Interest at the rate of 16% annually is being accrued by I.C. System, Inc. as of 9/13/2016.

Please pay this account today or immediately contact us to make payment arrangements.

If you will be receiving a tax refund and would like to use it to pay your account, please call us to make payment arrangements.

We are a debt collector attempting to collect a debt and any information obtained will be used for that purpose.

This does not contain a complete list of the rights consumers have under Federal, State, or Local laws.

New York City Department of Consumer Affairs License No. 0908324 and 1266437.

0540 - System - 076786879 - ISC - ICSYSTEM.WFD - 725746 - 00001377 - 05401SC 1 of 1

**PAYMENT OPTIONS**



Make online payment at:  
[www.yourpayment.com](http://www.yourpayment.com)  
Reference No: [Redacted]  
PIN: [Redacted]



Mail check or money order payable to  
I.C. System, Inc. with this portion of letter.  
Include Reference Number 109897485-1-19.



Call us: 800-279-9525.

➤ Billing Phone Number: \_\_\_\_\_

➤ E-Mail Address: \_\_\_\_\_

➤ Address Changed? Make Changes Below

Michele Campbell  
[Redacted]



I.C. System, Inc.  
PO Box 64378  
Saint Paul, MN 55164-0378

▲ Pay to ▲

05400000047644109897485001190101



P.O. Box 64437  
St. Paul, MN 55164-0437

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Northway Animal Emergency Clinic  
St. Paul, MN 55164-0378  
www.yourpayment.com  
Toll-Free No: 800-279-9525

**ACCOUNT SUMMARY**

Creditor: Northway Animal Emergency Clinic  
Account No: [REDACTED]  
I.C. System Reference No: [REDACTED]

Principal Due: \$439.27  
Interest Before 9/13/2016 Due: \$19.87  
Interest Since 9/13/2016 Due: \$29.09  
**BALANCE DUE: \$488.23**

\$0.00 has been Paid Since Placement



February 17, 2017



Michele Campbell

Michele Campbell:

We have contacted you several times regarding the balance stated in the account summary, which remains unpaid.

Our office has reported this debt to credit reporting agencies and you have the right to inspect those credit files in accordance with federal law.

If you fail to contact us to discuss payment of this account, our client has authorized us to pursue additional remedies to recover the balance due, including referring the account to an attorney.

Interest at the rate of 16% annually is being accrued by I.C. System, Inc. as of 9/13/2016.

Please pay this account today or immediately contact us to make payment arrangements.

If you will be receiving a tax refund and would like to use it to pay your account, please call us to make payment arrangements.

Sincerely,  
Beth Brown

We are a debt collector attempting to collect a debt and any information obtained will be used for that purpose.

This does not contain a complete list of the rights consumers have under Federal, State, or Local laws.

New York City Department of Consumer Affairs License No. 0908324 and 1266437.

0540 - x035a - 078515926 - 1SC - ICSYSTEM.WFD - 738490 - 00010372 - 05401SC 1 of 1

**PAYMENT OPTIONS**



Make online payment at:  
[www.yourpayment.com](http://www.yourpayment.com)  
Reference No: [REDACTED]  
PIN: [REDACTED]



Mail check or money order payable to  
I.C. System, Inc. with this portion of letter.  
Include Reference Number 109897485-1-19.



Call us: 800-279-9525.

➤ Billing Phone Number: \_\_\_\_\_

➤ E-Mail Address: \_\_\_\_\_

➤ Address Changed? Make Changes Below

Michele Campbell

[REDACTED]



I.C. System, Inc.  
PO Box 64378  
Saint Paul, MN 55164-0378

▲ Pay to ▲

05400000048823109897485001190101

JS 44 (Rev. 06/17)

**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.)

|  |   |
|--|---|
| <p><b>I. (a) PLAINTIFFS</b></p> <p>MICHELE CAMPBELL, et al.</p> <p><b>(b)</b> County of Residence of First Listed Plaintiff <u>Saratoga</u><br/><i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p><b>(c)</b> Attorneys <i>(Firm Name, Address, and Telephone Number)</i><br/>                 ROBERT L. ARLEO, ESQ., P.C. Robert L. Arleo<br/>                 380 Lexington Avenue 17th Fl.<br/>                 New York, NY 10168 212-551-1115</p> | <p><b>DEFENDANTS</b></p> <p>I.C. SYSTEM, INC.,</p> <p>County of Residence of First Listed Defendant _____<br/><i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys <i>(If Known)</i></p> |
|--|---|

|   |   |                            |  |                            |                            |            |            |                       |                            |                            |  |                            |                            |                          |                            |                            |  |                            |                            |   |                            |                            |                |                            |                            |
|---|---|----------------------------|--|----------------------------|----------------------------|------------|------------|-----------------------|----------------------------|----------------------------|--|----------------------------|----------------------------|--------------------------|----------------------------|----------------------------|--|----------------------------|----------------------------|---|----------------------------|----------------------------|----------------|----------------------------|----------------------------|
| <p><b>II. BASIS OF JURISDICTION</b> <i>(Place an "X" in One Box Only)</i></p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p> | <p><b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i></p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td></td> <td style="text-align: center;"><b>PTF</b></td> <td style="text-align: center;"><b>DEF</b></td> <td></td> <td style="text-align: center;"><b>PTF</b></td> <td style="text-align: center;"><b>DEF</b></td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated <i>or</i> Principal Place of Business In This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated <i>and</i> Principal Place of Business In Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table> |                            | <b>PTF</b>   | <b>DEF</b>                 |                            | <b>PTF</b> | <b>DEF</b> | Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated <i>or</i> Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 | Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 | Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |
|   | <b>PTF</b>  | <b>DEF</b>                 |  | <b>PTF</b>                 | <b>DEF</b>                 |            |            |                       |                            |                            |  |                            |                            |                          |                            |                            |  |                            |                            |   |                            |                            |                |                            |                            |
| Citizen of This State   | <input type="checkbox"/> 1  | <input type="checkbox"/> 1 | Incorporated <i>or</i> Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |            |            |                       |                            |                            |  |                            |                            |                          |                            |                            |  |                            |                            |   |                            |                            |                |                            |                            |
| Citizen of Another State  | <input type="checkbox"/> 2  | <input type="checkbox"/> 2 | Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |            |            |                       |                            |                            |  |                            |                            |                          |                            |                            |  |                            |                            |   |                            |                            |                |                            |                            |
| Citizen or Subject of a Foreign Country   | <input type="checkbox"/> 3  | <input type="checkbox"/> 3 | Foreign Nation   | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |            |            |                       |                            |                            |  |                            |                            |                          |                            |                            |  |                            |                            |   |                            |                            |                |                            |                            |

**IV. NATURE OF SUIT** *(Place an "X" in One Box Only)* Click here for: [Nature of Suit Code Descriptions.](#)

| CONTRACT  | TORTS  | FORFEITURE/PENALTY  | BANKRUPTCY  | OTHER STATUTES  |  |
|---|--|---|---|---|--|
| <input type="checkbox"/> 110 Insurance<br><input type="checkbox"/> 120 Marine<br><input type="checkbox"/> 130 Miller Act<br><input type="checkbox"/> 140 Negotiable Instrument<br><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment<br><input type="checkbox"/> 151 Medicare Act<br><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)<br><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits<br><input type="checkbox"/> 160 Stockholders' Suits<br><input type="checkbox"/> 190 Other Contract<br><input type="checkbox"/> 195 Contract Product Liability<br><input type="checkbox"/> 196 Franchise | <p><b>PERSONAL INJURY</b></p> <input type="checkbox"/> 310 Airplane<br><input type="checkbox"/> 315 Airplane Product Liability<br><input type="checkbox"/> 320 Assault, Libel & Slander<br><input type="checkbox"/> 330 Federal Employers' Liability<br><input type="checkbox"/> 340 Marine<br><input type="checkbox"/> 345 Marine Product Liability<br><input type="checkbox"/> 350 Motor Vehicle<br><input type="checkbox"/> 355 Motor Vehicle Product Liability<br><input type="checkbox"/> 360 Other Personal Injury<br><input type="checkbox"/> 362 Personal Injury - Medical Malpractice | <p><b>PERSONAL INJURY</b></p> <input type="checkbox"/> 365 Personal Injury - Product Liability<br><input type="checkbox"/> 367 Health Care/ Pharmaceutical<br><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability<br><p><b>PERSONAL PROPERTY</b></p> <input type="checkbox"/> 370 Other Fraud<br><input type="checkbox"/> 371 Truth in Lending<br><input type="checkbox"/> 380 Other Personal Property Damage<br><input type="checkbox"/> 385 Property Damage Product Liability | <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881<br><input type="checkbox"/> 690 Other<br><p><b>LABOR</b></p> <input type="checkbox"/> 710 Fair Labor Standards Act<br><input type="checkbox"/> 720 Labor/Management Relations<br><input type="checkbox"/> 740 Railway Labor Act<br><input type="checkbox"/> 751 Family and Medical Leave Act<br><input type="checkbox"/> 790 Other Labor Litigation<br><input type="checkbox"/> 791 Employee Retirement Income Security Act<br><p><b>IMMIGRATION</b></p> <input type="checkbox"/> 462 Naturalization Application<br><input type="checkbox"/> 465 Other Immigration Actions | <input type="checkbox"/> 422 Appeal 28 USC 158<br><input type="checkbox"/> 423 Withdrawal 28 USC 157<br><p><b>PROPERTY RIGHTS</b></p> <input type="checkbox"/> 820 Copyrights<br><input type="checkbox"/> 830 Patent<br><input type="checkbox"/> 835 Patent - Abbreviated New Drug Application<br><input type="checkbox"/> 840 Trademark<br><p><b>SOCIAL SECURITY</b></p> <input type="checkbox"/> 861 HIA (1395ff)<br><input type="checkbox"/> 862 Black Lung (923)<br><input type="checkbox"/> 863 DIWC/DIWW (405(g))<br><input type="checkbox"/> 864 SSID Title XVI<br><input type="checkbox"/> 865 RSI (405(g))<br><p><b>FEDERAL TAX SUITS</b></p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)<br><input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 | <input type="checkbox"/> 375 False Claims Act<br><input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))<br><input type="checkbox"/> 400 State Reapportionment<br><input type="checkbox"/> 410 Antitrust<br><input type="checkbox"/> 430 Banks and Banking<br><input type="checkbox"/> 450 Commerce<br><input type="checkbox"/> 460 Deportation<br><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations<br><input checked="" type="checkbox"/> 480 Consumer Credit<br><input type="checkbox"/> 490 Cable/Sat TV<br><input type="checkbox"/> 850 Securities/Commodities/Exchange<br><input type="checkbox"/> 890 Other Statutory Actions<br><input type="checkbox"/> 891 Agricultural Acts<br><input type="checkbox"/> 893 Environmental Matters<br><input type="checkbox"/> 895 Freedom of Information Act<br><input type="checkbox"/> 896 Arbitration<br><input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision<br><input type="checkbox"/> 950 Constitutionality of State Statutes |

**V. ORIGIN** *(Place an "X" in One Box Only)*

1 Original Proceeding   
 2 Removed from State Court   
 3 Remanded from Appellate Court   
 4 Reinstated or Reopened   
 5 Transferred from Another District *(specify)*   
 6 Multidistrict Litigation - Transfer   
 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity):* 15 U.S.C. sec 1692 et seq.

Brief description of cause: The defendant violated the Fair Debt Collection Practices Act

**VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.    **DEMAND \$** \_\_\_\_\_ **CHECK YES only if demanded in complaint:**

stat damages/costs/atty fee: **JURY DEMAND:**  Yes     No

**VIII. RELATED CASE(S) IF ANY** *(See instructions):* JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE: 10/5/17    SIGNATURE OF ATTORNEY OF RECORD: /s/ Robert L. Arleo

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT: \$400.00    APPLYING IFP \_\_\_\_\_ JUDGE: BKS    MAG. JUDGE: DJS

0206-4I59173

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Class Action Claims I.C. System Debt Notice Falsely Hinted at Attorney Involvement](#)

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