

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

DEBORAH OZIER, Individually and on Behalf of) All Others Similarly Situated,)	Case No.: 17-cv-118
)	CLASS ACTION COMPLAINT
Plaintiff,)	
vs.)	
)	Jury Trial Demanded
REV-1 SOLUTIONS, LLC,)	
)	
Defendant.)	

INTRODUCTION

1. This class action seeks redress for collection practices that violate the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* (the “FDCPA”).

JURISDICTION AND VENUE

2. The court has jurisdiction to grant the relief sought by the Plaintiff pursuant to 15 U.S.C. § 1692k and 28 U.S.C. §§ 1331 and 1337. Venue in this District is proper in that Defendant directed its collection efforts into the District.

PARTIES

3. Plaintiff Deborah Ozier is an individual who resides in the Eastern District of Wisconsin (Milwaukee County).

4. Plaintiff is a “consumer” as defined in the FDCPA, 15 U.S.C. § 1692a(3), in that Defendant sought to collect from her a debt allegedly incurred for personal, family or household purposes.

5. Defendant REV-1 Solutions, LLC (“REV-1”) is a foreign limited liability company with its principal place of business located at 517 US Hwy 31 N, Greenwood, IN 46142.

6. REV-1 is engaged in the business of a collection agency, using the mails and telephone to collect consumer debts originally owed to others.

7. REV-1 is engaged in the business of collecting debts owed to others and incurred for personal, family or household purposes. REV-1 is a debt collector as defined in 15 U.S.C. § 1692a.

FACTS

8. On or about November 16, 2016, REV-1 mailed three debt collection letters to Plaintiff regarding alleged debts. Copies of these letters are attached to this complaint as Exhibit A, Exhibit B and Exhibit C.

9. The alleged debts in Exhibits A, B and C were for personal medical services, allegedly owed to "COLUMBIA ST. MARY'S."

10. Upon information and belief, Exhibits A, B and C are form letters, generated by computer, and with the information specific to Plaintiff inserted by computer.

11. Upon information and belief, Exhibits A, B and C are form debt collection letters used by REV-1 to attempt to collect alleged debts.

12. Upon information and belief, Exhibits A, B and C are the first written communications that REV-1 sent to Plaintiff regarding the alleged debts to which Exhibits A, B and C refer.

13. Exhibits A, B and C contain the debt validation notice that the FDCPA requires to be included with the initial written communication to the consumer. 15 U.S.C. § 1692g(a).

14. Exhibit A also contains the following text:

Date of service 01/27/16 in the amount of \$26.23

15. Exhibit B also contains the following text:

Date of service 01/25/16 in the amount of \$66.93

16. Exhibit C also contains the following text:

Date of service 01/26/16 in the amount of \$26.30

17. Months elapsed between the “date of service” and the other date printed on Exhibits A, B and C.

18. It is not clear whether the amounts on Exhibits A, B and C are the actual amounts that REV-1 is attempting to collect.

19. For example, under Wisconsin law, parties can contract for the addition of interest on outstanding obligations. If Plaintiff and Columbia St. Mary’s agreed to a contractual interest rate, Exhibits A, B and C would understate the amount owed.

20. Regardless of whether the amounts sought in Exhibits A, B and C are the correct amounts or are not correct, REV-1’s letters (Exhibits A, B and C) fail to clearly state the amount of the debt on the date that the letter is sent to the consumer, in violation of 15 U.S.C. §§ 1692e and 1692g(a)(1).

21. 15 U.S.C. § 1692e generally prohibits a debt collector from using “any false, deceptive, or misleading representation or means in connection with the collection of any debt.

22. 15 U.S.C. § 1692e(2)(a) specifically prohibits “the false representation of the character, amount, or legal status of any debt.”

23. 15 U.S.C. § 1692e(10) also prohibits any “false representation or deceptive means to collect or attempt to collect any debt.

24. The Seventh Circuit has held that a debt collector must state the correct amount of the debt on the date a letter is sent to a consumer. *Miller v. McCalla, Raymer, Padrick, Cobb, Nichols, & Clark, L.L.C.*, 214 F.3d 872, 875 (7th Cir. 2000):

It is no excuse that it was “impossible” for the defendants to comply when as in this case the amount of the debt changes daily. What would or might be impossible for the defendants to do would be to determine what the amount of the debt might be at some future date if for example the interest rate in the loan agreement was variable. What they certainly could do was to state the total amount due--interest and other charges as well as principal--on the date the dunning letter was sent. We think the statute required this.

25. While *Miller* addressed a debt collector’s obligation to provide the amount of the debt under 15 U.S.C. § 1692g(a)(1), the Seventh Circuit has held that the standards for claims under § 1692e and § 1692g are the same. *McMillan v. Collection Professionals, Inc.*, 455 F.3d 754, 759 (7th Cir. 2006).

We cannot accept the district court’s view that claims brought under § 1692e or § 1692f are different from claims brought under § 1692g for purposes of Rule 12(b)(6) analysis. Whether or not a letter is ‘false, deceptive, or misleading’ (in violation of § 1692e) or ‘unfair or unconscionable’ (in violation of § 1692f) are inquiries similar to whether a letter is confusing in violation of § 1692g. After all, as our cases reflect, the inquiry under §§ 1692e, 1692g and 1692f is basically the same: it requires a fact-bound determination of how an unsophisticated consumer would perceive the letter.”)

26. REV-1’s letters (Exhibits A, B and C) fail to state the amount of the debt on the date that the letters are sent to the consumer.

27. The letters identify a date of service and a specified dollar amount, but then confuse and mislead as to what the actual amount due is.

28. Thus, the amount represented may or may not be the actual “amount of the debt” on Exhibits A, B and C.

29. REV-1's misrepresentation is a material false statement (*see Hahn v. Triumph P'ships LLC*, 557 F.3d 755, 757-58 (7th Cir. 2009)) because it misleads the unsophisticated consumer about the amount of the debt. 15 U.S.C. § 1692e(2)(a).

30. Plaintiff was confused by Exhibits A, B and C.

31. Plaintiff had to spend time and money investigating Exhibits A, B and C and the consequences of any potential responses to Exhibits A, B and C.

32. Plaintiff had to take time to obtain and meet with counsel, including travel to counsel's office by car and its related expenses (including but not limited to the cost of gasoline and mileage), to advise Plaintiff on the consequences of Exhibits A, B and C.

33. The FDCPA creates substantive rights for consumers; violations cause injury to consumers, and such injuries are concrete and particularized. *Quinn v. Specialized Loan Servicing, LLC*, No. 16 C 2021, 2016 U.S. Dist. LEXIS 107299 *8-13 (N.D. Ill. Aug. 11, 2016) (rejecting challenge to Plaintiff's standing based upon alleged FDCPA statutory violation); *Lane v. Bayview Loan Servicing, LLC*, No. 15 C 10446, 2016 U.S. Dist. LEXIS 89258 *9-10 (N.D. Ill. July 11, 2016) ("When a federal statute is violated, and especially when Congress has created a cause of action for its violation, by definition Congress has created a legally protected interest that it deems important enough for a lawsuit."); *Church v. Accretive Health, Inc.*, No. 15-15708, 2016 U.S. App. LEXIS 12414 *7-11 (11th Cir. July 6, 2016) (same); *see also Mogg v. Jacobs*, No. 15-CV-1142-JPG-DGW, 2016 U.S. Dist. LEXIS 33229, 2016 WL 1029396, at *5 (S.D. Ill. Mar. 15, 2016) ("Congress does have the power to enact statutes creating legal rights, the invasion of which creates standing, even though no injury would exist without the statute," (quoting *Sterk v. Redbox Automated Retail, LLC*, 770 F.3d 618, 623 (7th Cir. 2014))). For this

reason, and to encourage consumers to bring FDCPA actions, Congress authorized an award of statutory damages for violations. 15 U.S.C. § 1692k(a).

34. Moreover, Congress has explicitly described the FDCPA as regulating “abusive practices” in debt collection. 15 U.S.C. §§ 1692(a) – 1692(e). Any person who receives a debt collection letter containing a violation of the FDCPA is a victim of abusive practices. *See* 15 U.S.C. §§ 1692(e) (“It is the purpose of this subchapter to eliminate abusive debt collection practices by debt collectors, to insure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged, and to promote consistent State action to protect consumers against debt collection abuses”).

COUNT I – FDCPA

35. Plaintiff incorporates by reference as if fully set forth herein the allegations contained in the preceding paragraphs of this Complaint.

36. The language in REV-1’s letters is false, misleading and confusing to the unsophisticated consumer, in that the language fails to state an amount of the debt.

37. REV-1’s misrepresentation is a material false statement. Failure to state the amount of the debt is conduct that Congress has expressly made a violation of the FDCPA. 15 U.S.C. § 1692e(2)(a).

38. Failure to provide an accurate amount of the debt is also a “false representation or deceptive means to collect or attempt to collect any debt. 15 U.S.C. § 1692e(10).

39. The Defendant has therefore violated 15 U.S.C. §§ 1692e, 1692e(2)(a), 1692e(10), 1692g(a)(1).

CLASS ALLEGATIONS

40. Plaintiff brings this action on behalf of a Class, consisting of (a) all natural persons in the State of Wisconsin (b) who were sent a collection letter in the form represented by Exhibits A, B and C to the Complaint in this action, (c) seeking to collect a debt for personal, family or household purposes, (d) Between January 25, 2016 and January 25, 2017, (e) that was not returned by the postal service.

41. The Class is so numerous that joinder is impracticable. On information and belief, there are more than 50 members of the Class.

42. There are questions of law and fact common to the members of the class, which common questions predominate over any questions that affect only individual class members. The predominant common question is whether the Defendant complied with 1692e, 1692e(2)(a), 1692e(10), and 1692g(a)(1).

43. Plaintiff's claims are typical of the claims of the Class members. All are based on the same factual and legal theories.

44. Plaintiff will fairly and adequately represent the interests of the Class members. Plaintiff has retained counsel experienced in consumer credit and debt collection abuse cases.

45. A class action is superior to other alternative methods of adjudicating this dispute. Individual cases are not economically feasible.

JURY DEMAND

46. Plaintiff hereby demands a trial by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests that the Court enter judgment in favor of Plaintiff and the Class and against Defendant for:

- (a) actual damages;
- (b) statutory damages;
- (c) attorneys' fees, litigation expenses and costs of suit; and
- (d) such other or further relief as the Court deems proper.

Dated: January 25, 2017

ADEMI & O'REILLY, LLP

By: /s/ John D. Blythin
Shpetim Ademi (SBN 1026973)
John D. Blythin (SBN 1046105)
Mary A. Eldridge (SBN 1089944)
Denise L. Morris (SBN 1097911)
3620 East Layton Avenue
Cudahy, WI 53110
(414) 482-8000
(414) 482-8001 (fax)
sademi@ademilaw.com
jblythin@ademilaw.com
meldridge@ademilaw.com
dmorris@ademilaw.com

EXHIBIT A

REV-1 SOLUTIONS, LLC
RETURN MAIL ADDRESS
517 US HIGHWAY 31 N
GREENWOOD IN 46142-3932



NOV 16 2016
[REDACTED] 7118

011749

DEBORAH K OZIER
7055 N 55TH ST
MILWAUKEE WI 53223-6338



REMIT TO:
REV-1 SOLUTIONS, LLC
517 US HIGHWAY 31 N
GREENWOOD IN 46142-3932

Account of: DEBORAH K OZIER
Client: COLUMBIA ST. MARY'S
Account Number: [REDACTED] 1299
Date of service 01/27/16 in the amount of \$26.23

Notice: See Reverse Side for Important Information.

Dear DEBORAH K OZIER:

This account has been listed with our office for collections. If you need to make a payment arrangement or discuss your account, please call a REV-1 Solutions representative at **888.972.8055**. If you are mailing in your payment, please fill out the information on the reverse side and return that portion of the form in the enclosed envelope.

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




Sincerely,

REV-1 Solutions, LLC

THIS COMMUNICATION IS FROM A DEBT COLLECTOR. THIS IS AN ATTEMPT TO COLLECT A DEBT, AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

PLEASE MAKE CHECK PAYABLE TO REV-1 SOLUTIONS





REV-1 SOLUTIONS, LLC
517 US HIGHWAY 31 N
GREENWOOD IN 46142-3932

PATIENT NAME	DATE OF SERVICE	ACCOUNT NUMBER	BALANCE DUE
DEBORAH K OZIER	01/27/16	██████████ 299	\$26.23
To pay by MasterCard, Visa, or American Express, fill out below:			
 MasterCard		 Visa	
 American Express			
CARD NUMBER			SECURITY CODE
CARDHOLDER SIGNATURE			EXPIRATION DATE
CHECK NUMBER	PLEASE WRITE THE ACCOUNT NUMBER ON YOUR CHECK	AMOUNT PAID \$	

TO ENSURE PROPER CREDIT, PLEASE DETACH AND RETURN WITH PAYMENT IN ENVELOPE PROVIDED

FOR YOUR CONVENIENCE

You may submit payment:

-  Online at **www.rev1solutions.com** through our secure payment portal
-  By calling our account representatives at 888.972.8055
-  Via US Mail with the attached coupon to 517 US Highway 31 N, Greenwood, IN 46142-3932
-  In person at REV-1 Solutions, 517 US Highway 31 N, Greenwood, IN 46142-3932

If you have any questions or need additional information regarding your account, you may call REV-1 Solutions at **888.972.8055** or visit your personalized website at **www.rev1solutions.com**.

This collection agency is licensed by the Division of Banking in the Wisconsin Department of Financial Institutions, www.wdfi.org.

Exhibit B

REV-1 SOLUTIONS, LLC
RETURN MAIL ADDRESS
517 US HIGHWAY 31 N
GREENWOOD IN 46142-3932



NOV 16 2016
[REDACTED] 7118

011747


DEBORAH K OZIER
7055 N 55TH ST
MILWAUKEE WI 53223-6338

REMIT TO:
REV-1 SOLUTIONS, LLC
517 US HIGHWAY 31 N
GREENWOOD IN 46142-3932



Account of: DEBORAH K OZIER
Client: COLUMBIA ST. MARY'S
Account Number: [REDACTED] 299
Date of service 01/25/16 in the amount of \$66.93

Notice: See Reverse Side for Important Information.

Dear DEBORAH K OZIER:

This account has been listed with our office for collections. If you need to make a payment arrangement or discuss your account, please call a REV-1 Solutions representative at **888.972.8055**. If you are mailing in your payment, please fill out the information on the reverse side and return that portion of the form in the enclosed envelope.

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




Sincerely,

REV-1 Solutions, LLC

THIS COMMUNICATION IS FROM A DEBT COLLECTOR. THIS IS AN ATTEMPT TO COLLECT A DEBT, AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

PLEASE MAKE CHECK PAYABLE TO REV-1 SOLUTIONS

REV-1 SOLUTIONS, LLC
517 US HIGHWAY 31 N
GREENWOOD IN 46142-3932

PATIENT NAME	DATE OF SERVICE	ACCOUNT NUMBER	BALANCE DUE
DEBORAH K OZIER	01/25/16	██████████ 299	\$66.93
To pay by MasterCard, Visa, or American Express, fill out below:			
<input type="checkbox"/>  MasterCard	<input type="checkbox"/>  Visa	<input type="checkbox"/>  American Express	
CARD NUMBER		SECURITY CODE	
CARDHOLDER SIGNATURE		EXPIRATION DATE	
CHECK NUMBER	PLEASE WRITE THE ACCOUNT NUMBER ON YOUR CHECK	\$ AMOUNT PAID	

TO ENSURE PROPER CREDIT, PLEASE DETACH AND RETURN WITH PAYMENT IN ENVELOPE PROVIDED

FOR YOUR CONVENIENCE

You may submit payment:



Online at **www.rev1solutions.com** through our secure payment portal



By calling our account representatives at 888.972.8055



Via US Mail with the attached coupon to 517 US Highway 31 N, Greenwood, IN 46142-3932



In person at REV-1 Solutions, 517 US Highway 31 N, Greenwood, IN 46142-3932

If you have any questions or need additional information regarding your account, you may call REV-1 Solutions at **888.972.8055** or visit your personalized website at **www.rev1solutions.com**.

This collection agency is licensed by the Division of Banking in the Wisconsin Department of Financial Institutions, www.wdfi.org.

Exhibit C

REV-1 SOLUTIONS, LLC
RETURN MAIL ADDRESS
517 US HIGHWAY 31 N
GREENWOOD IN 46142-3932

REV-1
SOLUTIONS

NOV 16 2016
[REDACTED] 7118

011748


DEBORAH K OZIER
7055 N 55TH ST
MILWAUKEE WI 53223-6338

REMIT TO:
REV-1 SOLUTIONS, LLC
517 US HIGHWAY 31 N
GREENWOOD IN 46142-3932



Account of: DEBORAH K OZIER
Client: COLUMBIA ST. MARY'S
Account Number: [REDACTED] 1299
Date of service 01/26/16 in the amount of \$26.30

Notice: See Reverse Side for Important Information.

Dear DEBORAH K OZIER:

This account has been listed with our office for collections. If you need to make a payment arrangement or discuss your account, please call a REV-1 Solutions representative at **888.972.8055**. If you are mailing in your payment, please fill out the information on the reverse side and return that portion of the form in the enclosed envelope.

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

Sincerely,

REV-1 Solutions, LLC

THIS COMMUNICATION IS FROM A DEBT COLLECTOR. THIS IS AN ATTEMPT TO COLLECT A DEBT, AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

PLEASE MAKE CHECK PAYABLE TO REV-1 SOLUTIONS





REV-1 SOLUTIONS, LLC
517 US HIGHWAY 31 N
GREENWOOD IN 46142-3932

PATIENT NAME	DATE OF SERVICE	ACCOUNT NUMBER	BALANCE DUE
DEBORAH K OZIER	01/26/16	299	\$26.30
To pay by MasterCard, Visa, or American Express, fill out below:			
<input type="checkbox"/> MasterCard	<input type="checkbox"/> VISA	<input type="checkbox"/> AMERICAN EXPRESS	<input type="checkbox"/>
CARD NUMBER			SECURITY CODE
CARDHOLDER SIGNATURE			EXPIRATION DATE
CHECK NUMBER	PLEASE WRITE THE ACCOUNT NUMBER ON YOUR CHECK	AMOUNT PAID \$	

TO ENSURE PROPER CREDIT, PLEASE DETACH AND RETURN WITH PAYMENT IN ENVELOPE PROVIDED

FOR YOUR CONVENIENCE

You may submit payment:

-  Online at **www.rev1solutions.com** through our secure payment portal
-  By calling our account representatives at 888.972.8055
-  Via US Mail with the attached coupon to 517 US Highway 31 N, Greenwood, IN 46142-3932
-  In person at REV-1 Solutions, 517 US Highway 31 N, Greenwood, IN 46142-3932

If you have any questions or need additional information regarding your account, you may call REV-1 Solutions at **888.972.8055** or visit your personalized website at **www.rev1solutions.com**.

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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 THE REVERSE OF THE FORM.)

Place an X in the appropriate Box: Green Bay Division Milwaukee Division

I. (a) PLAINTIFFS
DEBORAH OZIER

(b) County of Residence of First Listed Plaintiff Milwaukee
 (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)
 Ademi & O'Reilly, LLP, 3620 E. Layton Ave., Cudahy, WI 53110
 (414) 482-8000-Telephone (414) 482-8001-Facsimile

DEFENDANTS
REV-1 SOLUTIONS, LLC

County of Residence of First Listed Defendant _____
 (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff 3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
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)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	

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 7 Appeal to District Judge from Magistrate Judgment

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. 1692 et seq

Brief description of cause:
 Violation of Fair Debt Collection Practices Act

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

VIII. RELATED CASE(S) IF ANY (See instructions): JUDGE _____ DOCKET NUMBER _____

DATE: January 25, 2017 SIGNATURE OF ATTORNEY OF RECORD: s/ John D. Blythin

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.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

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.

VI. 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

VII. 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.

VIII. Related Cases. This section of the JS 44 is used to reference related pending cases if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

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

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

DEBORAH OZIER

Plaintiff

v.

REV-1 SOLUTIONS, LLC

Defendant

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Civil Action No. 17-cv-118

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* REV-1 SOLUTIONS, LLC
c/o C T CORPORATION SYSTEM
8020 Excelsior Dr. Ste. 200
Madison, WI 53717

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:

John D. Blythin
Ademi & O'Reilly, LLP
3620 East Layton Avenue
Cudahy, WI 53110
(414) 482-8000-Telephone

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. 17-cv-118

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:

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [REV-1 Solutions, LLC Knocked with Debt Collection Class Action](#)
