

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

CASE NO.

HELEN PICKLES, *on behalf of herself  
and all others similarly situated,*

Plaintiff,

v.

GATESTONE & CO. INTERNATIONAL INC.,  
*a Delaware Corporation,*

Defendant.

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**CLASS ACTION COMPLAINT**

1. Plaintiff, Helen Pickles alleges 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 Plaintiff resides here, and Defendant conducts business in this District.

**PARTIES**

3. Plaintiff, Helen Pickles (“Plaintiff”), is a natural person and citizen of the State of Florida, residing in Saint Lucie County, Florida.

4. 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.

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

6. Defendant is licensed in the State of Florida to collect consumer debts, license number CCA0900919. Defendant is not licensed in the State of Florida to collect commercial debts.

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

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

**FACTUAL ALLEGATIONS**

9. Defendant sought to collect from Plaintiff an alleged debt incurred by Plaintiff for personal, family, or household purposes; more specifically, the debt at issue was delinquent mobile phone debt.

10. On or about September 14, 2017, Defendant sent a letter to Plaintiff that sought to collect an alleged debt due to AT&T Mobility. (The “Demand Letter”). Attached hereto as “Exhibit 1.”

11. The Demand Letter was Defendant’s initial communication with Plaintiff with respect to the debt alleged therein.

12. The Defendant’s Demand Letter 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](http://www.gatestoneco.com)[.]

13. Pursuant to *15 U.S.C §1692g(a)*, Defendant must provide Plaintiff 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.)

14. *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.

15. Defendant's Demand Letter falsely and misleadingly pronounces the verification rights of Plaintiff 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 Plaintiff's written notification must dispute the debt or any portion thereof as stated in *15 U.S.C. §1692g(4)*.

16. 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 Plaintiff of what she needs to notify Defendant's office of, i.e. that she needs 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.

17. 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**

18. This action is brought on behalf of a Class consisting of (i) all persons with addresses in the Florida Counties that comprise the geographical boundaries of the United States District Court for the Southern District of Florida, namely Miami-Dade, Monroe, Broward, Palm

Beach, Martin, Saint Lucie, Indian River, Okeechobee, and Highlands Counties (ii) to whom initial communication 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) that were mailed, or caused to be mailed, 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 prior one year period ending on the date of the filing of this Complaint.

19. Plaintiff alleges 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 initial communication letters served upon the Class is so numerous that joinder of all members of the Class is impractical.

20. 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 mailed an initial communication letter from 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*.

21. Plaintiff’s claims are typical of those of the Class members. All are based on the same facts and legal theories.

22. Plaintiff will fairly and adequately protect the interests of the Class. She has retained counsel experienced in handling actions involving unlawful practices under the *FDCPA*

and Class actions. Neither Plaintiff nor her counsel have any interests which might cause them not to vigorously pursue this action.

23. 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.

24. Plaintiff requests certification of a Class under *Rule 23(b)(3)* of the *Federal Rules of Civil Procedure* for monetary damages; her appointment as Class Representative; and that her attorney Leo W. Desmond be appointed Class Counsel.

### **COUNT I**

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

25. Plaintiff incorporates Paragraphs 1 through 17.

26. 15 U.S.C. §1692g(a)(4) states after an initial communication the Defendant must provide Plaintiff 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

27. Defendant mailed, or caused to be mailed, the Demand Letter to Plaintiff and the Class on behalf of Plaintiff's creditor in an attempt to collect a personal consumer debt, namely to collect an alleged debt due to Plaintiff's AT&T Mobility account.

28. Defendant's Demand Letter omits 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.

29. Defendant's statement in its Demand Letter only states that the Plaintiff and the Class need to notify Defendant's office, however it does not inform the Plaintiff and the Class of what she/they need(s) to "notify" Defendant's office of, i.e. that they need to dispute in writing the amount of the debt, or any portion of the debt, to receive verification of the debt or a copy of a judgment if one exists.

30. 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)*.

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

32. As a result of Defendant's conduct, Plaintiff 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 and §1692e(10)** **CLASS CLAIM AGAINST DEFENDANT**

33. Plaintiffs re-allege Paragraphs 1 through 17 and Paragraphs 26 through 30.

34. *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.

35. Defendant mailed, or caused to be mailed, the Demand Letter to Plaintiff and the Class on behalf of Plaintiff's creditor in an attempt to collect a consumer debt, namely to collect an alleged debt due to Plaintiff's AT&T Mobility account.

36. Defendant's Demand Letter omits that the consumer must dispute the debt or any portion of the debt in writing in order to receive verification of the debt, despite the clear wording of *15 U.S.C. §1692g(a)(4)*.

37. 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 Plaintiff and the Class must dispute the debt or any portion thereof in writing in order to receive verification of the debt as well as the protections available pursuant to *15 U.S.C. §1692g(b)*.

38. Defendant's statement in its Demand Letter only states that the Plaintiff and the Class need to notify Defendant's office, however it does not inform the Plaintiff and the Class of what she/they need(s) to "notify" Defendant's office of, i.e. that they need to dispute in writing the amount of the debt, or any portion of the debt, to receive verification of the debt or a copy of a judgment if one exists.

39. 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.

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

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

**WHEREFORE**, Plaintiff requests that the Court enter judgment in her favor against Defendant for:

- a. An Order certifying this matter as a Class action and appointment of Plaintiff as Class Representative as to all claims against Defendant;
- b. An Order appointing Leo W. Desmond as Class Counsel;
- c. An award of statutory damages for Plaintiff 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 12, 2017.

Respectfully submitted,

/s/ Leo W. Desmond  
Leo W. Desmond, Esq.  
Florida Bar No. 0041920  
DESMOND LAW FIRM, P.C  
5070 Highway A1A  
Suite D  
Vero Beach, Florida 32963  
Telephone: 772.231.9600  
Facsimile: 772.231.0300  
lwd@desmondlawfirm.com  
[Attorney for Plaintiff](#)

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.

I. (a) PLAINTIFFS Helen Pickles DEFENDANTS Gatestone & Co. International Inc., a Delaware Corporation

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

(c) Attorneys (Firm Name, Address, and Telephone Number) Desmond Law Firm, P.C. (772) 231.9600 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

II. 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)

Grid for Basis of Jurisdiction and Citizenship of Principal Parties with checkboxes for U.S. Government Plaintiff/Defendant, Federal Question, Diversity, Citizen of This/Another State, and Foreign Country.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large grid for Nature of Suit with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only) with checkboxes for Original Proceeding, Removed from State Court, Reinstated or Reopened, Transferred from another district, Multidistrict Litigation Transfer, Appeal to District Judge from Magistrate Judgment, Multidistrict Litigation - Direct File, 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 Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity): Violation of the Fair Debt Collection Practices Act 15 U.S.C. Section 1692 et seq. LENGTH OF TRIAL via 3 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 DATE December 12, 2017 SIGNATURE OF ATTORNEY OF RECORD /s/Leo W. Desmond FL Bar 0041920

**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

HELEN PICKLES, on behalf of herself
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 (Registered Agent)
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:

Leo W. Desmond, Esquire
Desmond Law Firm, P.C.
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:

1000 N. West Street  
Suite 1200  
Wilmington, DE 19801

	<b>GATESTONE</b>
	Visit our website: <a href="http://www.gatestoneco.com">www.gatestoneco.com</a> 800-678-3052 Our hours of operation are Mon – Fri 8:00am to 5:00pm EST
Date: September 14, 2017 Reference #: [REDACTED] 0644 Creditor: AT&T MOBILITY LLC Account #: [REDACTED] 4795 Amount Owing: \$306.97	

001091 000001760



HELEN PICKLES  
4181 N US HIGHWAY 1  
FORT PIERCE FL 34946-8409



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](http://www.gatestoneco.com) with the use of this security code 038713.

Sincerely,  
LUCINDA FRABLE  
(866) 878-7906

UA

-----  
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 \$ \_\_\_\_\_

Reference #: [REDACTED] 0644

Company: Gatestone & Co. International Inc. (Loc. 76)

HELEN PICKLES  
4181 N US HIGHWAY 1  
FORT PIERCE, FL 34946-8409

Gatestone & Co. International Inc.  
1000 N. 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 fund 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.



1000 N. West Street  
Suite 1200  
Wilmington, DE 19801

HELEN PICKLES  
4181 N US HIGHWAY 1  
FORT PIERCE, FL 34946-8409

	G A T E S T O N E
	Visite nuestro sitio web: <a href="http://www.gatestoneco.com">www.gatestoneco.com</a> 800-678-3052 Nuestro horario de atención es: de lunes a viernes s, de 8:00 a. m. a 5:00 p. m., hora del este.
Fecha: 14 de septiembre de 2017 # de Referencia : ██████████0644 Acreedor: AT&T MOBILITY LLC # de Cuenta: ██████████4795 Cantidad que A deuda: \$306.97	

Estimado señor o señora:

Su cuenta ha sido puesta en manos de Gatestone & Co. Internacional Inc., una agencia de cobro a morosos. Esta carta enviada por un cobrador es un intento de recuperar una deuda y cualquier información obtenida se usará para ese propósito. Las llamadas hechas o recibidas por nuestra empresa pueden ser monitoreadas o grabadas con el propósito del control de calidad.

A menos que usted notifique a esta oficina dentro de los 30 días después de recibir este aviso que usted discute la validez de la deuda o cualquier parte de tal deuda, esta oficina supondrá que esta deuda sea válida. Si usted presenta su notificación a esta oficina por escrito dentro de los 30 días después de haber recibido este aviso, esta oficina: obtendrá la verificación de la deuda u obtendrá una copia de la sentencia y le enviará una copia de tal sentencia o verificación. Si usted presenta una solicitud por escrito a esta oficina dentro de los 30 días después de haber recibido este aviso, esta oficina le proporcionará el nombre y dirección del acreedor original, si es diferente al acreedor actual.

Si usted tiene cualquier pregunta en cuanto a su pago o cuenta, por favor comuníquese por teléfono a nuestra oficina. Asegúrese que su pago identifica claramente su nombre y el de su acreedor para que su pago pueda ser correctamente abonado a su cuenta.

Se pueden realizar pagos por cheques en línea en nuestro sitio web [www.gatestoneco.com](http://www.gatestoneco.com) con usar este código de dispositivo de seguridad 038713.

Atentamente,  
LUCINDA FRABLE  
(866) 878-7906

UA

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Por favor, desprenda y envíe esta parte con el pago

Opción 1: Emita el cheque pagadero a: Gatestone & Co. International Inc.  
 Opción 2: Previamente Autorizado – Pago Automático [    ]  
 # de Tránsito Bancario \_\_\_\_\_  
 Nombre del Banco \_\_\_\_\_  
 # de Cheque \_\_\_\_\_  
 # de Cuenta \_\_\_\_\_  
 Nombre del Titular de la Cuenta \_\_\_\_\_  
 Firma \_\_\_\_\_  
 Cantidad del Pago \$ \_\_\_\_\_

HELEN PICKLES  
4181 N US HIGHWAY 1  
FORT PIERCE, FL 34946-8409

Nº de Referencia: ██████████0644  
Compañía: Gatestone & Co. International Inc. (Loc. 76)

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

Al mandar sus cheques por correo, usted autoriza a Gatestone & Co. International Inc. a realizar un débito en su cuenta una vez por la cantidad del cheque via transfer de fondos electronico (EFT). Los fondos pueden ser retirados de su cuenta tan pronto como el mismo dia que se recibe el pago. En caso de que su cheque es devuelto impago por insuficiencia de fondos o fondos incobrables, se podra volver a presentar su cheque.Su cheque no sera devuelto por su institucion financiera.

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Suit Claims Gatestone & Co. Miscommunicated Consumer's FDCPA Rights](#)

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