

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

CASE NO.

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

Plaintiff,

v.

NPAS, INC.,
a Tennessee Corporation,

Defendant.

CLASS ACTION COMPLAINT

1. Plaintiff 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 the *Fair Debt Collection Practices Act*, pursuant to 28 U.S.C. §1331 and 15 U.S.C. §1692k.

3. Venue in this District is proper because Plaintiff resides here, and Defendant conducts business in this District.

PARTIES

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

5. Defendant, NPAS, Inc. (“Defendant”), is a Tennessee Corporation and is engaged in the business of collecting consumer debts, which operates from offices located at One Park Plaza, Nashville, Tennessee 37203.

6. Defendant regularly uses the United States Postal Service and telephone in the collection of consumer debts.

7. Defendant is licensed in Florida as a consumer collection agency, license number CCA9902869. Defendant is not licensed in Florida as a commercial collection agency.

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

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

FACTUAL ALLEGATIONS

10. Defendant sought to collect a consumer debt from Plaintiff, more specifically, a medical debt. The debt was incurred primarily for personal, household or family use. The debt was not incurred for any commercial purpose.

11. On or about October 14, 2017, Defendant mailed or caused to be mailed to Plaintiff a letter seeking payment of an alleged debt. (The “Demand Letter” is attached hereto as “Exhibit 1”).

12. The Demand Letter states, in part:

Our records reflect that you were previously contacted regarding the unpaid balance of the account. We urge you to send payment in full today.

13. The Demand Letter states payment is due by 10/29/17. Fourteen days after the statement date on the Demand Letter.

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

15. *15 U.S.C. §1692g(a)-(b)* states:

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.

(b) Disputed debts

If the consumer notifies the debt collector in writing within the thirty-day period described in subsection (a) of this section that the debt, or any portion thereof, is disputed, or that the consumer requests the name and address of the original creditor, the debt collector shall cease collection of the debt, or any disputed portion thereof, until the debt collector obtains verification of the debt or a copy of a judgment, or the name and address of the original creditor, and a copy of such verification or judgment, or name and address of the original creditor, is mailed to the consumer by the debt collector. Collection activities and communications that do not otherwise violate this subchapter may continue during the 30-day period referred to in subsection (a) of this section unless the consumer has notified the debt collector in writing that the debt, or any portion of the debt, is disputed

or that the consumer requests the name and address of the original creditor. **Any collection activities and communication during the 30-day period may not overshadow or be inconsistent with the disclosure of the consumer's right to dispute the debt or request the name and address of the original creditor.**

(Emphasis added).

16. Defendant's Demand Letter does not contain the disclosures required prescribed by *15 U.S.C. §1692g(a)* and therefore violates the *FDCPA*.

17. Defendant's demand for payment "today" overshadows Plaintiff's 30-day dispute period and therefore violates the *FDCPA*. Defendant's demand for payment by 10/29/17, fourteen days after the date of the Demand Letter, overshadows Plaintiff's 30-day dispute period and therefore violates the *FDCPA*.

18. *15 U.S.C. §1692e (11)* 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

(11) The failure to disclose in the initial written communication with the consumer and, in addition, if the initial communication with the consumer is oral, in that initial oral communication, that the debt collector is attempting to collect a debt and that any information obtained will be used for that purpose, and the failure to disclose in subsequent communications that the communication is from a debt collector, except that this paragraph shall not apply to a formal pleading made in connection with a legal action.

19. The Defendant's Demand Letter fails to disclose that the Defendant is a debt collector, that the Demand Letter is an attempt to collect a debt, and that any information obtained

will be used to that purpose as required by *15 U.S.C. §1692e(11)*, and is therefore a violation of the *FDCPA*.

20. 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

21. This action is brought on behalf of a Class consisting of (i) all persons with addresses in Saint Lucie County, Florida (ii) to whom initial communication letters were mailed, or caused to be mailed (iii) by Defendant (iv) that did not contain the disclosures required by *15 U.S.C. §1692g(a)* and *15 U.S.C. §1692e(11)* (v) that were not returned undeliverable by the U.S. Post Office (vi) in an attempt to collect a debt incurred for personal, family, or household purposes (vii) during the prior one year period ending on the date of the filing of this Complaint.

22. Plaintiff alleges on information and belief that Defendant's practice of sending initial communication letters that did not contain the disclosures required by *15 U.S.C. §1692g(a)* and *15 U.S.C. § 1692e(11)* served upon the Class is so numerous that joinder of all members of the Class is impractical.

23. There are questions of law or fact common to the Class. The common issues predominate over any issues involving only individual Class members. The common legal and factual issue to each Class member is that each was mailed, or caused to be mailed, an initial communication letter by Defendant that did not contain the disclosures required by *15 U.S.C. §1692g(a)* and *15 U.S.C. §1692e(11)*.

24. Plaintiff's claim is typical of those of the Class members. All are based on the same facts and legal theories.

25. 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.

26. 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.

27. 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 CLASS CLAIM
VIOLATION OF 15 U.S.C. §1692g(a)

28. Plaintiff re-alleges Paragraphs 1 through 20.

29. After an initial communication with Plaintiff, pursuant to *15 U.S.C §1692g(a)* the Defendant must provide the Plaintiff with:

(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.

30. Pursuant to the *FDCPA*, the Demand Letter was an initial communication between Defendant and Plaintiff.

31. Defendant's Demand Letter did not contain the disclosures required by *15 U.S.C. §1692g(a)* of the *FDCPA*.

32. Defendant's Demand Letter would be misleading to the least sophisticated consumer with regard to his/her legal rights as it omits that the consumer may dispute the debt and/or request the name of the original creditor despite the clear wording of *15 U.S.C. §1692g(a)*.

33. 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*.

34. 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*.

COUNT II CLASS CLAIM
VIOLATION OF 15 U.S.C. §1692g(b)

35. Plaintiff re-alleges Paragraphs 1 through 20 and Paragraphs 29 through 32.

36. *15 U.S.C. §1692g(b)* states:

(b) Disputed debts

If the consumer notifies the debt collector in writing within the thirty-day period described in subsection (a) of this section that the debt, or any portion thereof, is disputed, or that the consumer requests the name and address of the original creditor, the debt collector shall cease collection of the debt, or any disputed portion thereof, until the debt collector obtains verification of the debt or a copy of a judgment, or the name and address of the original creditor, and a copy of such verification or judgment, or name and address of the original creditor, is mailed to the consumer by the debt collector. Collection activities and communications that do not otherwise violate this subchapter may continue during the 30-day period referred to in subsection (a) of this section unless the consumer has notified the debt collector in writing that the debt, or any portion of the debt, is disputed or that the consumer requests the name and address of the original creditor. **Any collection activities and communication during the 30-day period may not overshadow or be inconsistent with the disclosure of the consumer's right to dispute the debt or request the name and address of the original creditor.**

(Emphasis added).

37. Pursuant to the FDCPA, the Demand Letter was an initial communication between Defendant and Plaintiff.

38. Defendant's statement: "We urge you to send payment in full today." overshadows Plaintiff's verification right as provided by *15 U.S.C. §1692g*.

39. The Demand Letter states payment is due by 10/29/17, fourteen days after the statement date on the Demand Letter, and overshadows Plaintiff's verification right as provided by *15 U.S.C. §1692g*.

40. Defendant's statement requesting payment "today" and to call an 800 number to "discuss options for resolving" the account, creates a sense of urgency that overshadows the notice requirement of *15 U.S.C. §1692g(a)* by encouraging the Plaintiff and members of the Class to disregard their validation rights prescribed by *15 U.S.C. §1692g* and call Defendant immediately upon receiving the Demand Letter to arrange for payment.

41. The verification rights provided by *15 U.S.C. §1692g* must be effectively conveyed to the consumer.

42. Defendant's demand for immediate payment of the debt overshadows and contradicts Plaintiff's verification rights as provided by *15 U.S.C. §1692g(a)*.

43. 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*.

44. 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*.

COUNT III CLASS CLAIM
VIOLATION OF 15 U.S.C. §1692e(11)

45. Plaintiff re-alleges Paragraphs 1 through 20, 29 through 32 and 36 through 42.

46. *15 U.S.C. §§1692e (11)* 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

(11) The failure to disclose in the initial written communication with the consumer and, in addition, if the initial communication with the consumer is oral, in that initial oral communication, that the debt collector is attempting to collect a debt and that any information obtained will be used for that purpose, and the failure to disclose in subsequent communications that the communication is from a debt collector, except that this paragraph shall not apply to a formal pleading made in connection with a legal action.

47. The Demand Letter Defendant mailed or caused to be mailed to Plaintiff was a communication in connection with the collection of a debt between Defendant and Plaintiff.

48. The Demand Letter is misleading as it did not contain the disclosures required by *15 U.S.C. §1692g(a)* in violation of the *FDCPA*.

49. The Demand Letter is misleading as it did not contain the disclosures required by *15 U.S.C. §1692e(11)* in violation of the *FDCPA*.

50. The Demand Letter requests payment immediately despite the 30-day dispute period provided by *15 U.S.C. §1692g(a)*. The request for immediate payment overshadows the 30-day dispute period provided by *15 U.S.C. §1692g(a)*.

51. Defendant's Demand Letter would be deceptive to the least sophisticated consumer with regard to his/her legal rights.

52. 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*.

53. 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*.

RELIEF REQUESTED

WHEREFORE, Plaintiff prays for the following relief:

- a. An Order certifying the *FDCPA* matter as a Class Action and appointment of Plaintiff as Class Representative;
- 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 and further relief as the Court deems proper.

Dated: December 12, 2017.

Respectfully submitted,

/s/ Leo W. Desmond
Leo W. Desmond, Esquire

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 NPAS, INC., a Tennessee 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) Leo W. Desmond Desmond Law Firm, P.C. 5070 A1A, Suite d, Vero Beach, FL 32963772.231.9600

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. Attorneys (If Known)

(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)

- 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)

- Citizen of This State PTF DEF 1 1 Incorporated or Principal Place of Business In This State
Citizen of Another State 2 2 Incorporated and Principal Place of Business In Another State
Citizen or Subject of a Foreign Country 3 3 Foreign Nation

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

Grid of categories for nature of suit: 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)

- 1 Original Proceeding 2 Removed from State Court 3 Re-filed (See VI below) 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation Transfer 7 Appeal to District Judge from Magistrate Judgment 8 Multidistrict Litigation - Direct File 9 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): Violations of the Fair Debt Collection Practices Act, 15 U.S.C. Section 1692 et seq. LENGTH OF TRIAL via 4 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

FOR OFFICE USE ONLY

RECEIPT # AMOUNT IFP JUDGE MAG JUDGE

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Brief Description: Unauthorized reception of cable service

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

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

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

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

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

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

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

Plaintiff(s)

v.

NPAS, INC.,
a Tennessee Corporation,

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

NPAS, INC.
c/o C T Corporation System (Registered Agent)
1200 South Pine Island Road
Plantation, Florida 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:

NPAS, Inc.
 P.O. BOX 99008
 BEDFORD, TX 76095



401022-724853387-A1

Services
 Provided by:



Patient Name:	Helen Pickles
Account Number:	██████████3678
Service Date(s):	06/25/2017 - 06/25/2017
Statement Date:	10/14/2017
Placement Date:	09/04/2017

002396

Responsible Party

HELEN PICKLES
7405 GEORGES RD
FORT PIERCE, FL 34951-4915

Contact Us

NPAS, Inc.
 Toll Free 1-800-377-2013 Espanol: 1-800-681-9692
 MON-FRI 8AM-9PM SAT 9AM-1PM CT

Please be prepared to provide the patient/responsible party full name, date of birth and mailing address. All calls may be recorded.

PAYMENT REQUEST

Total Payments \$ 3,753.00	Current Balance \$ 100.00	Payment Due By 10/29/17	Amount You Owe \$ 100.00
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Our records reflect that you were previously contacted regarding the unpaid balance of the account. We urge you to send payment in full today. In the event you are unable to pay the balance in full, please contact us at 1-800-377-2013 to discuss options for resolving your account.

Insurance Information

If the insurance information on file is incorrect, please contact us at 1-800-377-2013.

Primary: BLUE CARE HIX

Payment Options

- PAY ONLINE** at your provider's website:
www.lawnwoodmed.com/billpay
- PAY BY PHONE** at no additional cost through our automated system during or after normal business hours. Toll Free 1-800-377-2013.
- MAIL PAYMENT:** make payment out to the provider below and send with the attached coupon to the payment address specified below.

Please Detach and Return This Portion With Your Payment

If your address changed, check this box and complete form on back.

HELEN PICKLES
7405 GEORGES RD
FORT PIERCE, FL 34951-4915

Statement Date 10/14/2017

Account Number	██████████3678
Payment Due Date	10/29/17
Balance Due	\$ 100.00
Payment Amount Enclosed	

Please do not send cash. If paying by check or money order, please indicate account number and make payable to:
LAWNWOOD REGIONAL MEDICAL CENTER.

PLEASE DETACH THIS COUPON AND RETURN WITH PAYMENT TO ADDRESS BELOW:

LAWNWOOD REGIONAL MEDICAL CENTER
P.O. BOX 740771
CINCINNATI, OH 45274-0771



Credit Card Authorization (please check one)	
<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
Credit Card Number	Exp. Date
_____	_____
Cardmember's Signature	\$ _____ Amount
_____	_____

THANK YOU FOR CHOOSING LAWNWOOD REGIONAL MEDICAL CENTER AS YOUR HEALTHCARE PROVIDER.

FREQUENTLY ASKED QUESTIONS

Q: Who is NPAS, Inc.?

A: NPAS, Inc. is a company that is managing your account for the healthcare provider.

Q: Is an itemized bill available?

A: A detailed itemization of this statement is available upon request by calling 1-800-377-2013.

Q: Why am I receiving separate bills for physician services?

A: Many physicians are not employed by the medical facility and will bill you separately.

Q: I received a bill from a doctor whom I did not see. Why?

A: The provider where you received treatment sends laboratory tests and x-rays to physicians to review. You will receive a separate bill from these physicians for their services.

Q: How much do I really owe?

A: Your responsibility is the "Amount You Owe" located on the front of the statement. This balance will reflect any co-payments, deductibles, co-insurance or non-covered services your insurance indicates are your responsibility.

Q: What should I do if I think my insurance company should have paid more?

A: Please review your Explanation of Benefits (EOB) or contact your insurance company with any questions. If your insurance indicates a rebill is required, please contact our office at the phone number on the other side.

Q: What if my insurance doesn't pay timely?

A: It is your responsibility to ensure that your insurance company pays in a timely manner. Payment is expected within thirty days of submitting a claim. Please respond timely to any inquiries from your insurance company or contact them regarding delays.

Address/Phone Change

If your address or phone number has changed, please provide the corrected information below and return this portion of the letter to the return address located in the upper left corner on the front of this letter.

Responsible Party Name: Helen Pickles Account Number: 3678

Address: Apt:

City: State: Zip:

Home Phone Number: Cell Phone Number*:

Work Phone Number:

*By giving your cell phone number above, you are giving permission to be contacted on that cell number via an automatic dialing system or prerecorded voice.

Responsible Party Signature:

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [NPAS Hit with Debt Collection Lawsuit from Florida Woman](#)
