

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

PETER SCHOENTHAL, individually and on behalf  
of all others similarly situated,

Plaintiff,

vs.

RESEARCH CENTERS OF AMERICA, LLC, a  
Florida limited liability company,

Defendant,

CLASS ACTION

JURY TRIAL DEMANDED

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**CLASS ACTION COMPLAINT**

1. Plaintiff, PETER SCHOENTHAL brings this action against Defendant, RESEARCH CENTERS OF AMERICA, LLC, to secure redress for violations of the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227.

2. Specifically, Plaintiff brings a claim pursuant to 47 U.S.C. § 227(b), for unsolicited text messages made by Defendant, or at Defendant’s direction, to the cellular telephones of Plaintiff and others using an autodialer.

**JURISDICTION AND VENUE**

3. This is an action for damages in excess of \$15,000, exclusive of interest, costs and attorneys’ fees, arising from Defendant’s violations of the TCPA.

4. This Court has personal jurisdiction over Defendant and venue is proper because (1) Defendant does business in this District, and (2) a substantial part of the events giving rise to Plaintiff’s claims occurred here, including the unwanted text messages that Defendant sent or caused to be sent to Plaintiff’s cellular telephone using an automatic telephone dialing system.

## PARTIES

5. Plaintiff PETER SCHOENTHAL is a natural person and resident of Miami-Dade County, Florida.

6. Defendant RESEARCH CENTERS OF AMERICA, LLC, is a Florida limited liability company with its principle place of business at 7261 Sheridan Street, Suite 120, Hollywood, FL 33024. Defendant's registered agent for service of process in Florida is Peter P. Ventre located at 7261 Sheridan Street, Suite 120, Hollywood, FL 33024.

### THE TELEPHONE CONSUMER PROTECTION ACT OF 1991

7. The TCPA was passed into law in 1991. The TCPA regulates and restricts the use of automatic telephone equipment.

8. The TCPA protects consumers from unwanted calls and text messages that are made with autodialers and with prerecorded messages.

9. Specifically, 47 U.S.C. § 227(b) provides:

(1) **Prohibitions** It shall be unlawful for any person within the United States, or any person outside the United States if the recipient is within the United States—

(A) to make any call (other than a call made for emergency purposes or made with the prior express consent of the called party) using any automatic telephone dialing system ... (iii) to any telephone number assigned to a paging service, cellular telephone service, specialized mobile radio service, or other radio common carrier service, or any service for which the called party is charged for the call.

10. The Federal Communications Commission ("FCC") is empowered to issue rules and regulations implementing the TCPA.

11. The FCC has issued rulings and clarified that in order to obtain an individual's consent, a clear, unambiguous, and conspicuous written disclosure must be provided to the individual. *See* 2012 FCC Order, 27 FCC Rcd. at 1839 ("[R]equiring prior written consent will better protect consumer privacy because such consent requires conspicuous action by the consumer — providing permission in writing — to authorize autodialed or prerecorded telemarketing calls....").

12. Further, the FCC has issued rulings and clarified that consumers are entitled to the same consent-based protections for text messages as they are for calls to wireless numbers. *See Satterfield v. Simon & Schuster, Inc.*, 569 F.3d 946, 952 (9th Cir. 2009) (The FCC has determined that a text message falls within the meaning of “to make any call” in 47 U.S.C. § 227(b)(1)(A)); *Toney v. Quality Res., Inc.*, 75 F. Supp. 3d 727, 734 (N.D. Ill. 2014) (Defendant bears the burden of showing that it obtained Plaintiff’s prior express consent before sending her the text message).

13. According to findings by the Federal Communication Commission (“FCC”), the agency Congress vested with authority to issue regulations implementing the TCPA, such calls are prohibited because, as Congress found, automated or prerecorded telephone calls are a greater nuisance and invasion of privacy than live solicitation calls, and such calls can be costly and inconvenient. The FCC also recognized that wireless customers are charged for incoming calls whether they pay in advance or after the minutes are used. *See Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket No. 02-278, Report and Order, 18 FCC Rcd 14014 (2003).

14. The FCC has “repeatedly acknowledged the existence of vicarious liability under the TCPA.” *See Gomez v. Campbell-Ewald Co.*, 768 F.3d 871, 878 (9th Cir. 2014) (citing *In re Joint Petition Filed by Dish Network, LCC*, 28 FCC. Rcd. 6574, 6574 (2013)). Principles of apparent authority and ratification may also provide a basis for vicarious seller liability for violations of section 227(b). *See Thomas v. Taco Bell Corp.*, 582 F. App’x 678 (9th Cir. 2014) (citing 28 F.C.C. Rcd. at 6590 n. 124). A ratification occurs when the benefits of the purportedly unauthorized acts are accepted with full knowledge of the facts under circumstances demonstrating the intent to adopt the unauthorized arrangement. *Stalley v. Transitional Hosps. Corp. of Tampa, Inc.*, 44 So. 3d 627, 631 (Fla. 2d DCA 2010).

## FACTS

15. Defendant is a Florida limited liability company that specializes in conducting Phase I-IV CNS trials for pharmaceutical and biotechnology companies.

16. At all times relevant, Plaintiff was a citizen of the State of Florida. Plaintiff is, and at all times mentioned herein was, a “person” as defined by 47 U.S.C. § 153 (39).

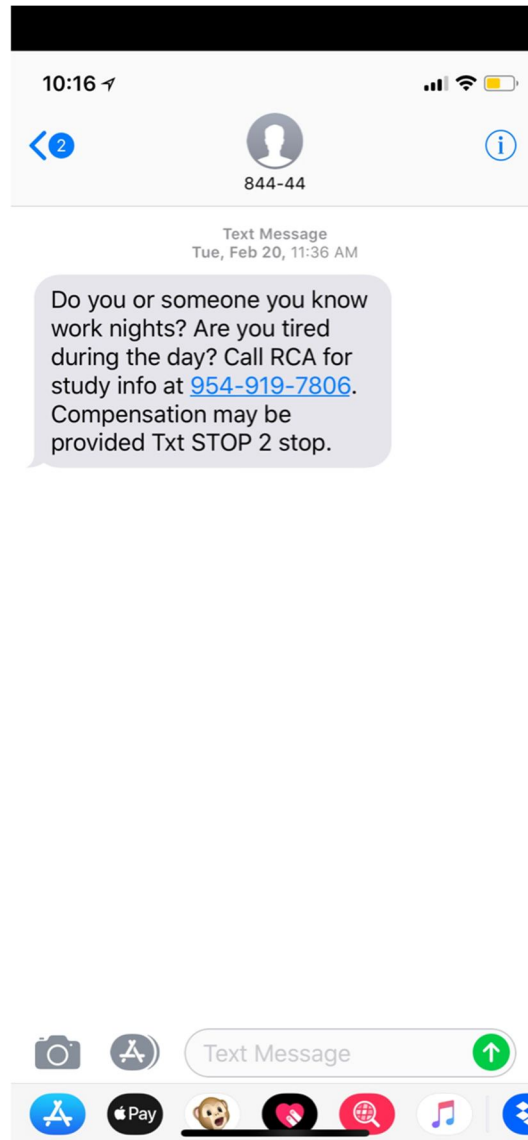
17. On information and belief, Defendant, in order to drive people to visit its location and drum up business, surreptitiously obtained the cellular telephone number of Plaintiff and others, then proceeded to send or cause others to send unsolicited telemarketing text messages to those individuals, using automatic telephone dialing equipment.

18. The purpose of the unsolicited telemarketing text message was to convince consumers like Plaintiff to come to Defendant’s office to participate in research studies.

19. Those people whose cellular telephones were text messaged by Defendant or at Defendant’s direction never actually consented to receive such marketing text messages.

20. On information and belief, Defendant and/or its agent lacks a sufficiently adequate system for limiting autodialed text messages to cellular phones for which it does not have prior express permission to call. These are unsolicited text messages sent for the purpose of marketing to potential customers.

21. On or about Tuesday, February 20, at approximately 11:36 a.m., Defendant, or Defendant’s agent, text messaged Plaintiff using an autodialer for purposes of selling goods or services:



22. Plaintiff has never given Defendant permission to contact his cellular telephone, whether through the use of an autodialer or otherwise.

23. Plaintiff was damaged by Defendant's text message. His privacy was wrongfully invaded, and Plaintiff has become understandably aggravated with having to deal with the frustration of unwanted text messages forcing him to divert attention away from his work and other activities.

24. Defendant's violations of the TCPA were knowing and willful.

25. Defendant's unsolicited text message caused Plaintiff actual harm, including invasion of his privacy, aggravation, annoyance, intrusion on seclusion, trespass, and conversion.

26. Further, the generic nature of Defendant's text messages, combined with the large number of messages sent by Defendant, demonstrates that Defendant utilizes an automatic telephone dialing system ("ATDS") in transmitting the messages.

27. Specifically, upon information and belief, Defendant utilizes a combination of hardware and software systems to send the text messages at issue in this case. The systems utilized by Defendant have the capacity to store, produce, and dial random or sequential numbers, and/or receive and store lists of telephone numbers, and to dial such numbers, *en masse*, in an automated fashion without human intervention.

#### **CLASS ALLEGATIONS**

28. Plaintiff brings this case on behalf of a Class defined as follows:

*All persons in the United States who, within four years prior to the filing of this action, Defendant or some person on Defendant's behalf sent a text message to their cell phone using a device with the capacity to dial numbers without human intervention, where the recipient did not give the cell phone number to Defendant for purposes of receiving automated marketing calls.*

29. Upon information and belief, Defendant or its affiliates texted more than 30 non-customers in the four years preceding the filing of this action using an automatic dialer, where Defendant obtained the phone numbers from sources other than directly from the call recipients.

30. Common questions of law or fact exist as to all members of the putative Class and predominate over any question solely affecting any individual member, including Plaintiff. Such questions common to the Class include but are not limited to:

- a. Whether Defendant used an "automatic telephone dialing system" as such term is defined or understood under the TCPA and applicable FCC regulations and orders;

- b. Whether Defendant had prior express permission to contact Plaintiff and the other members of the putative Class when it sent text messages, or caused text messages to be sent, to their cell phones using an automatic telephone dialing system; and
- c. Damages, including whether Defendant's violations were performed willfully or knowingly such that Plaintiff and the members of the putative Class are entitled to trebled damages.

31. Plaintiff's claims are typical of the claims of the other members of the putative Class. The factual and legal bases of Defendant's liability to Plaintiff and the other members of the putative Class are the same: Defendant violated the TCPA by causing the cellular telephone number of each member of the putative Class, including Plaintiff, to be text messaged using an automatic telephone dialing system without prior express permission.

32. Plaintiff will fairly and adequately protect the interests of the Class. Plaintiff has no interests that might conflict with the interests of the Class. Plaintiff is interested in pursuing his claim vigorously, and has retained counsel competent and experienced in class and complex litigation, including with regards to the claim alleged herein.

33. Class action treatment is superior to the alternatives for the fair and efficient adjudication of the controversy alleged herein. Such treatment will permit a large number of similarly situated persons to prosecute their common claims in a single forum simultaneously, efficiently, and without the duplication of effort and expense that numerous individual actions would entail. There are, on information and belief, thousands of members of the putative Class, such that joinder of all members is impracticable.

34. No difficulties are likely to be encountered in the management of this class action that would preclude its maintenance as a class action, and no superior alternative exists for the fair and efficient adjudication of this controversy.

35. Defendant has acted and failed to act on grounds generally applicable to Plaintiff and the other members of the Class, thereby making relief appropriate with respect to the Class as a whole. Prosecution of separate actions by individual members of the putative Class, should they even realize that their rights have been violated, would likely create the risk of inconsistent or varying adjudications with respect to individual members of the Class that would establish incompatible standards of conduct.

36. The identity of the Class is, on information and belief, readily identifiable from the records of Defendant and/or any affiliated marketers.

**COUNT I**  
**KNOWING AND/OR WILLFUL VIOLATIONS OF THE TCPA, 47 U.S.C. § 227(b)**

37. Plaintiff re-alleges and incorporates the preceding paragraphs as if fully set forth herein.

38. Defendant violated the TCPA by sending unsolicited text messages to Plaintiff and the Class members on their cellular phones without first obtaining their prior express consent and using equipment which constitutes an automatic telephone dialing system for the express purpose of marketing Defendant's goods and/or services.

39. Defendant's text messages caused Plaintiff and the Class members actual harm including, but not limited to, invasion of their personal privacy, aggravation, nuisance and disruption in their daily lives, reduction in cellular telephone battery life, messaging charges, and loss of use of their cellular telephones.

40. As a result of the aforementioned violations of the TCPA, Plaintiff and the Class are entitled to an award of \$500.00 in statutory damages for each call in negligent violation of the TCPA, or up to \$1,500 in statutory damages for each call in willful violation of the TCPA, pursuant to 47 U.S.C. § 227(b)(3)(B).

41. Additionally, Plaintiff and the Class are entitled to and seek injunctive relief prohibiting such future conduct



**WHEREFORE**, Plaintiff and members of the Class demand a jury trial on all claims so triable, and judgment against Defendant for the following:

- a. Injunctive relief prohibiting violations of the TCPA by Defendant in the future;
- b. Statutory damages of \$500.00 for each and every text message made in negligent violation of the TCPA or \$1,500 for each and every call made in willful violation of the TCPA, pursuant to 47 U.S.C. § (b)(3)(B); and
- c. Such other relief as this Court deems just and proper.

**COUNT II**  
**VIOLATIONS OF THE TCPA, 47 U.S.C. § 227(c)**

42. Plaintiff re-alleges and incorporates paragraphs 1-36 as if fully set forth herein.

43. Plaintiff and members of the Class received more than one telephone call within a 12-month period, by or on behalf of Defendant, for the express purpose of marketing Defendant's goods and/or services without their written prior express consent.

44. Defendant's text messages caused Plaintiff and members of the Class actual harm including, but not limited to, invasion of their personal privacy, aggravation, nuisance and disruption in their daily lives, reduction in cellular telephone battery life, messaging charges, and loss of use of their cellular telephones.

45. As a result of the aforementioned violations of the TCPA, Plaintiff and the Class are entitled to an award of up to \$1,500.00 for each text in violation of the TCPA pursuant to 47 U.S.C. § 227(c)(5).

46. Additionally, Plaintiff and members of the Class are entitled to and seek injunctive relief prohibiting such future conduct.

**WHEREFORE**, Plaintiff and members of the Class demand a jury trial on all claims so triable, and judgment against Defendant for the following:

- a. Injunctive relief prohibiting violations of the TCPA by Defendant in the future;

- b. Statutory damages of \$500.00 for each and every text message made in negligent violation of the TCPA or \$1,500 for each and every call made in willful violation of the TCPA, pursuant to 47 U.S.C. § (b)(3)(B); and
- c. Such other relief as this Court deems just and proper.

**JURY DEMAND**

Plaintiff and Class Members hereby demand trial by jury.

Dated: March 15, 2018

Respectfully submitted,

**SHAMIS & GENTILE, P.A.**

14 NE 1<sup>st</sup> Ave., Suite 400

Miami, FL 33132

Telephone (305) 479-2299

Facsimile (786) 623-0915

Email: [efilings@shamisgentile.com](mailto:efilings@shamisgentile.com)

By: /s/Andrew J. Shamis  
ANDERW J. SHAMIS, ESQ  
Florida Bar # 101754

*Attorneys for Plaintiff PETER SCHOENTHAL and  
all others similarly situated*

***HIRALDO P.A.***

*/s/Manuel S. Hiraldo*

Manuel S. Hiraldo

Florida Bar No. 030380

401 E. Las Olas Boulevard

Suite 1400

Ft. Lauderdale, Florida 33301

Email: [mhiraldo@hirdolaw.com](mailto:mhiraldo@hirdolaw.com)

Telephone: 954.400.4713

CIVIL COVER SHEET

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

I. (a) PLAINTIFFS PETER SCHOENTHAL, individually and on behalf of all others similarly situated DEFENDANTS RESEARCH CENTERS OF AMERICA, LLC

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

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

(c) Attorneys (Firm Name, Address, and Telephone Number) Shamis & Gentile, PA 14 NE 1st Ave, STE 400 Miami, FL 33132

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. Attorneys (If Known) Entin Law Group, P.A. 633 S. Andrews Ave, STE 500 Ft. Lauderdale, FL 33301

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

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

- [ ] 1 U.S. Government Plaintiff Federal Question (U.S. Government Not a Party)
[ ] 2 U.S. Government Defendant 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
Citizen of Another State [ ] PTF [ ] DEF
Citizen or Subject of a Foreign Country [ ] PTF [ ] DEF
Incorporated or Principal Place of Business In This State [ ] PTF [ ] DEF
Incorporated and Principal Place of Business In Another State [ ] PTF [ ] DEF
Foreign Nation [ ] PTF [ ] DEF

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

Grid of categories for nature of suit: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, PERSONAL INJURY, TORTS, PRISONER PETITIONS, LABOR, IMMIGRATION, FORFEITURE/PENALTY, 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 Telephone Consumer Protection Act, 47 U.S.C. § 227
LENGTH OF TRIAL via 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 \$ CHECK YES only if demanded in complaint: JURY DEMAND: [ ] Yes [ ] No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE
DATE March 15, 2018 SIGNATURE OF ATTORNEY OF RECORD

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.** Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).

**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.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

PETER SCHOENTHAL, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

RESEARCH CENTERS OF AMERICA, LLC  
Defendant.

Case No.

**CLASS ACTION**

**SUMMONS**

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)* Peter P. Ventre  
Registered Agent:  
7261 Sheridan Street  
STE 120  
Hollywood, FL 33024

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:

Shamis & Gentile, P.A.  
Andrew J. Shamis, Esq.  
14 NE 1<sup>st</sup> Ave, STE 400  
Miami, FL 33132  
305-479-2299

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 \_\_\_\_\_

\_\_\_\_\_  
*Servers Signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's Address*

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Research Centers of America Accused of Sending Illegal Marketing Text Messages](#)

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