UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WISCONSIN

Tanya Bonson and Benjamin Bonson, on behalf of themselves and all others similarly situated,	Case No.: 18-cv-1033
Plaintiffs,	CLASS ACTION COMPLAINT
V.	JURY TRIAL DEMANDED
A-1 Collection Service, Inc.,	
Defendant.	

NATURE OF THE ACTION

1. Plaintiffs bring this action against Defendant The Traf Group, Inc. d/b/a A-1 Collection Service for damages and other relief arising from Defendant's violations of the Fair Debt Collection Practices Act, 15 U.S.C. §1692, et seq. (hereinafter the "FDCPA").

2. As described more fully below, Defendant violated the FDCPA by sending collection letters to Plaintiffs and other consumers, by falsely stating it was licensed by the Division of Banking in the Wisconsin Department of Financial Institutions.

PARTIES

 Plaintiff Tanya Bonson is a natural person currently residing in Iowa County, Wisconsin.

Plaintiff Benjamin Bonson is a natural person currently residing in Iowa County,
 Wisconsin.

5. Defendant The Traf Group, Inc. d/b/a A-1 Collection Service (hereinafter "The Traf Group" or "A-1 Collection") is a foreign corporation with an office located at 2297 Highway 33,

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Suite 906, Hamilton Square, NJ 08690.

JURISDICTION AND VENUE

6. Jurisdiction of this Court arises out of events emanating from this District and this Court has jurisdiction pursuant to 15 U.S.C. § 1692 et seq. and 28 U.S.C § 1331.

7. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) because the conduct at issue occurred in this District, Plaintiff resides in this District, and Defendant conducts business in this district.

FACTUAL ALLEGATIONS

8. At all times relevant, Defendant regularly attempted to collect debts alleged to be owed to another.

9. At all times relevant, Defendant regularly collected debts owed or alleged to be owed to another.

10. At all times relevant, Defendant regularly attempted to collect debts alleged to be owed to another which were incurred primarily for personal, family or household purposes.

11. At all times relevant, Defendant regularly collected debts owed or alleged to be owed to another which were incurred primarily for personal, family or household purposes.

12. At all times relevant, Defendant used the mail, telephone or other instruments of interstate commerce in its attempts to collect debts owed or alleged to be owed another.

13. At all times relevant, Defendant used the mail, telephone or other instruments of interstate commerce in its attempts to collect debts incurred primarily for personal, family or household purposes owed or alleged to be owed another.

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14. At all times relevant, the principal business engaged in by Defendant was the collection of debts which were incurred primarily for personal, family or household purposes.

15. The debt alleged to be owed by the Plaintiffs was allegedly incurred primarily for personal, family or household purposes.

16. Prior to October 2018, Plaintiffs incurred a debt with Ward-Brodt Music Mall (hereinafter "Ward-Brodt").

17. Sometime later, Ward-Brodt hired Defendant to collect that debt from Plaintiffs.

18. On October 17, 2018, Defendant sent a collection letter to Plaintiffs. See ExhibitA.

19. Upon information and belief, <u>Exhibit A</u> is a form letter, generated by computer, and with the information specific to Plaintiffs is inserted by computer.

20. That collection letter stated "This collection agency is licensed by the Division of Banking in the Wisconsin Department of Financial Institutions, <u>www.wdfi.org</u>."

The above language on a collection letter is a representation that the debt collector holds a
 Wisconsin Collection Agency License, pursuant to Wis. Stat. § 218.04 and Wis. Admin. Code § DFI Bkg. 74.

22. Defendant does not, in fact, hold a Wisconsin Collection Agency License.

23. Defendant is not licensed by the Division of Banking or any other Wisconsin governmental agency.

24. Defendant was not licensed by the Division of Banking or any other Wisconsin governmental agency at the time Defendant sent <u>Exhibit A</u> to Plaintiffs.

25. Defendant is not listed on the Division of Banking's website that lists all collection agencies that currently hold a Wisconsin collection agency license._

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http://www.wdfi.org/fi/lfs/licensee lists/Default.asp?Browse=CA (visited November 2, 2018).

26. A false statement about a debt collector's licensing status is a material false statement. "It suggests that [the debt collector] has been approved by the state, thereby enhancing in the mind of the unsophisticated consumer [the debt collector's] legitimacy and power to collect the debt." *Radaj v. ARS Nat. Services, Inc.*, No. 05 C 773, 2006 U.S. Dist. LEXIS 68883 at *10; 2006 WL 2620394 at *3 (E.D. Wis. Sep. 12, 2006); *Seeger v. Aid Assocs.*, 2007 U.S. Dist. LEXIS 22824 at *13, 2007 WL 1029528 (E.D. Wis. Mar. 29, 2007) ("this court believes that the false statement used by Plaza that it was licensed by the state of Wisconsin, is precisely the kind of misrepresentation that Congress sought to prohibit when it passed the FDCPA."); *see also, Derosia v. Credit Corp. Sols.*, 2018 U.S. Dist. LEXIS 50016, at *9-10 (E.D. Wis. Mar. 27, 2018) ("upon learning that Tasman is not a collection agency licensed with the DFI, such a consumer would be more likely to assume the letter is a scam and ignore it.").

CAUSES OF ACTION

COUNT I. VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT

27. Plaintiffs incorporate by reference as if fully set forth herein the allegations contained in the preceding paragraphs of this Complaint.

28. <u>Exhibit A</u> falsely states that: "This collection agency is licensed by the Division of Banking" for the State of Wisconsin.

29. Defendant did not hold a Wisconsin Collection Agency License when it sent Exhibit A to Plaintiffs.

30. Defendant did not hold a Wisconsin Collection Agency License when it sent Exhibit A to any class member.

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31. The template collection letters used by Defendant were objectively confusing, false, and misleading to an unsophisticated consumer.

32. Defendant's letter to Plaintiffs illegally attempts to collect a debt from Plaintiffs in violation of 15 USC §§ 1692d, 1692e, 1692e(1), 1692e(9), and 1692f.

33. 15 U.S.C. § 1692e generally prohibits "any false, deceptive, or misleading representation or means in connection with the collection of any debt."

34. 15 U.S.C. § 1692e(1) specifically prohibits the false representation that "the debt collector is vouched for, bonded by, or affiliated with the United States or any State, including the use of any badge, uniform, or facsimile thereof."

35. 15 U.S.C. § 1692e(9) specifically prohibits "the use or distribution of any written communication which simulates or is falsely represented to be a document authorized, issued, or

approved by any court, official, or agency of the United States or any State, or which creates a false impression as to its source, authorization, or approval."

CLASS ALLEGATIONS

36. Plaintiffs bring this action on behalf of a Class, consisting of (a) all natural persons in the State of Wisconsin (b) who were sent a collection letter by Defendant, (c) stating that Defendant is licensed by the Division of Banking in Wisconsin, (d) seeking to collect a debt for personal, family or household purposes, (e) in the one calendar year preceding the filing date of this case, (f) that was not returned by the postal service.

37. The Class is so numerous that joinder is impracticable. Upon information and belief, there are more than 40 members of the Class.

38. There are questions of law and fact common to the members of the class, which common questions predominate over any questions that affect only individual class members. The predominant

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common question is whether Exhibit A violates the FDCPA.

39. Plaintiffs' claims are typical of the claims of the Class members. All are based on the same factual and legal theories.

40. Plaintiffs will fairly and adequately represent the interests of the Class members. Plaintiffs

have retained counsel experienced in consumer credit and debt collection abuse cases.

41. A class action is superior to other alternative methods of adjudicating this dispute as individual cases are not economically feasible.

JURY DEMAND

42. Plaintiffs hereby demand a trial by jury.

WHEREFORE, Plaintiffs respectfully pray that relief be granted as follows:

- a. That judgment be entered against Defendant for actual and statutory damages pursuant to 15 U.S.C. § 1692k(a)(2)(A) and (B);
- b. That the Court award costs and reasonable attorneys' fees, pursuant to 15 U.S.C. § 1692k(a)(3);
- c. That an order be entered certifying the proposed Class under Rule 23 of the Federal Rules of Civil Procedure and appointing Plaintiff and her counsel to represent the Class;
- d. That the Court grant declaratory and injunctive relief, in the form of finding Defendant's conduction to violate the law and prohibiting them from continuing their collection practices; and
- e. That the Court grants such other and further relief as may be just and proper.

Dated this 12th day of December, 2018.

Respectfully submitted,

By: <u>s/ Nathan E. DeLadurantey</u> Nathan E. DeLadurantey, (WI #1063937) DELADURANTEY LAW OFFICE, LLC 330 S. Executive Drive, Suite 109 Brookfield, WI 53005 Telephone: (414) 377-0515 Facsimile: (414) 755-0860 <u>Nathan@dela-law.com</u> Thomas J. Lyons, Jr., Esq. (MN #249646) CONSUMER JUSTICE CENTER, P.A. 367 Commerce Court Vadnais Heights, MN 55127 Telephone: (651) 770-9707 Facsimile: (651) 704-0907 tommycjc@aol.com

Zeshan Usman, WI Bar #1069404 USMAN LAW FIRM, LLC 525 Junction Rd., Ste. 8520N Madison, WI 53717 (608) 829-1112; (888) 876-2636 – Fax Z@UsmanLaw.com

ATTORNEYS FOR PLAINTIFF

JS 44 (Rev. 09/11)

Case: 3:18-cv-01033 CIVEL COVER SHEET^{2/12/18} Page 1 of 2

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.)*

I. (a) PLAINTIFFS Tanya Bonson and Benja	amin Bonson			DEFENDANTS A-1 Collection Serv	<i>v</i> ice, Inc.	
· · ·	of First Listed Plaintiff <u>lo</u> XCEPT IN U.S. PLAINTIFF CA.	wa SES)		County of Residence	of First Listed Defendant (IN U.S. PLAINTIFF CASES) IN LAND CONDEMNATION O THE TRACT OF LAND INVOI	CASES, USE THE LOCATION OF
(c) Attorneys (Firm Name,) DeLadurantey Law Office 330 S. Executive Drive, S				Attorneys (If Known)		
II. BASIS OF JURISD	ICTION (Place an "X" is	n One Box Only)			RINCIPAL PARTIES	(Place an "X" in One Box for Plaintiff)
□ 1 U.S. Government Plaintiff	X 3 Federal Question (U.S. Government N	lot a Party)		For Diversity Cases Only) P1 n of This State		
2 U.S. Government Defendant	4 Diversity (Indicate Citizenship)	p of Parties in Item III)		n of Another State	of Business In A	
				eign Country		
IV. NATURE OF SUIT		nly) RTS	FO	RFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
 110 Insurance 120 Marine 130 Miller Act 140 Negotiable Instrument 150 Recovery of Overpayment & Enforcement of Judgment 151 Medicare Act 152 Recovery of Defaulted Student Loans (Excl. Veterans) 153 Recovery of Overpayment 	PERSONAL INJURY 310 Airplane 315 Airplane Product Liability 320 Assault, Libel & Slander 330 Federal Employers' Liability 340 Marine 345 Marine Product Liability	 PERSONAL INJURY 365 Personal Injury - Product Liability 367 Health Care/ Pharmaceutical Personal Injury Product Liability 368 Asbestos Personal Injury Product Liability PERSONAL PROPERT 	☐ 690 	5 Drug Related Seizure of Property 21 USC 881 0 Other LABOR	422 Appeal 28 USC 158 423 Withdrawal 28 USC 157 PROPERTY RIGHTS 820 Copyrights 830 Patent 840 Trademark SOCIAL SECURITY 861 HIA (1395ff)	 375 False Claims Act 400 State Reapportionment 410 Antitrust 430 Banks and Banking 450 Commerce 460 Deportation 470 Racketeer Influenced and Corrupt Organizations 480 Consumer Credit 490 Cable/Sat TV 850 Securities/Commodities/
Of Veteran's Benefits of Veteran's Benefits 160 Stockholders' Suits 190 Other Contract 195 Contract Product Liability 196 Franchise REAL PROPERTY	□ 350 Motor Vehicle □ 355 Motor Vehicle Product Liability □ 360 Other Personal Injury □ 362 Personal Injury - Med. Malpractice CIVIL RIGHTS	 370 Other Fraud 371 Truth in Lending 380 Other Personal Property Damage 385 Property Damage Product Liability 	□ 720 □ 740 □ 753 □ 790 □ 793	Act 0 Labor/Mgmt. Relations 0 Railway Labor Act 1 Family and Medical Leave Act 0 Other Labor Litigation 1 Empl. Ret. Inc. Security Act	□ 861 HIA (1393H) □ 862 Black Lung (923) □ 863 DIWC/DIWW (405(g)) □ 864 SSID Title XVI □ 865 RSI (405(g)) FEDERAL TAX SUITS	 Sto Securities/Commodutes/ Exchange 890 Other Statutory Actions 891 Agricultural Acts 893 Environmental Matters 895 Freedom of Information Act 896 Arbitration 899 Administrative Procedure
 210 Land Condemnation 220 Foreclosure 230 Rent Lease & Ejectment 240 Torts to Land 245 Tort Product Liability 290 All Other Real Property 	 Given Rights 440 Other Civil Rights 441 Voting 442 Employment 443 Housing/ Accommodations 445 Amer. w/Disabilities - Employment 446 Amer. w/Disabilities - Other 448 Education 	□ 510 Motions to Vacate Sentence Habeas Corpus: □ □ 530 General □ 535 Death Penalty □ 540 Mandamus & Othe □ 555 Prison Condition □ 560 Civil Detainee - Conditions of Confinement	er 🗆 463	IMMIGRATION 2 Naturalization Application 3 Habeas Corpus - Alien Detainee (Prisoner Petition) 5 Other Immigration Actions	 870 Taxes (U.S. Plaintiff or Defendant) 871 IRS—Third Party 26 USC 7609 	Act/Review or Appeal of Agency Decision ☐ 950 Constitutionality of State Statutes
I Original □ 2 Re	te Court	Appellate Court	Reop	ened or 5 anothe		
VI. CAUSE OF ACTIO	DN 15 U.S.C. § 1692 Brief description of ca		0.1	Do not cite jurisdictional sta	tutes unless diversity):	
VII. REQUESTED IN COMPLAINT:	CHECK IF THIS UNDER F.R.C.P.	IS A CLASS ACTION 23	DI	EMAND \$	CHECK YES only JURY DEMAND:	if demanded in complaint: : IX Yes □ No
VIII. RELATED CASI IF ANY	E(S) (See instructions):	JUDGE			DOCKET NUMBER	
DATE		SIGNATURE OF ATT				
12/12/2018		s/ Nathan E. De	Ladur	antey		
FOR OFFICE USE ONLY RECEIPT # AN	MOUNT	APPLYING IFP		JUDGE	MAG. JUI	DGE
Print	Save As					Reset

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

VI.Cause of Action.Report the civil statute directly related to the cause of action and give a brief description of the cause.Do not cite jurisdictional statutesunless diversity.Example:U.S. Civil Statute: 47 USC 553
Brief Description: Unauthorized reception of cable service

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

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

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

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

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

Case: 3:18-cv-01033 Document #: 1-2 Filed: 12/12/18 Page 1 of 2

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Wisconsin

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Tanya Bonson and Benjamin Bonson,	
Plaintiff	

v.

Civil Action No. 18-cv-1033

A-1 Collection Service, Inc.,

Defendant

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) A-1 Collection Service, Inc. 2297 Highway 33, Suite 906 Hamilton Square, NJ 08690

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: Nathan E. DeLadurantey

Nathan E. DeLadurantey DeLadurantey Law Office, LLC 330 S. Executive Drive, Suite 109 Brookfield, WI 53005

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

AO 440 (Rev. 12/09) Summons in a Civil Action (Page 2)

Civil Action No. 18-cv-1033

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

	This summons for (nam	ne of individual and title, if a	uny)			
was ree	ceived by me on (date)					
	□ I personally served	the summons on the in	dividual at (place)			
				on (date)	; or	
	□ I left the summons	at the individual's resid	lence or usual place	ce of abode with (name)		
			-	e age and discretion who resid		
	on (date)	, and mailed a	copy to the indiv	idual's last known address; or		
	□ I served the summer	ons on (name of individual)				, who is
	designated by law to a	accept service of proces	s on behalf of (nam	ne of organization)		
				on (date)	; or	
	\Box I returned the summ	nons unexecuted becau	se			; or
	Other (<i>specify</i>):					
	My fees are \$	for travel and	\$	for services, for a total of \$	0.	00
	I declare under penalty	y of perjury that this inf	formation is true.			
Date:						
				Server's signature		
				Printed name and title		

Server's address

Additional information regarding attempted service, etc:

Case: 3:18-cv-01033 Document #: 1-3 Filed: 12/12/18 Page 1 of 13



2297 Highway 33, Suite 906 Hamilton Square, NJ 08690-1717 Tel: 1-862-260-2005 Outside of Area: 1-877-745-2700 For: Client Acct #: Re: Amt Due: A-1 Account #: TANYA BONSON Exhibit A 228885-2 WARD-BRODT MUSIC MALL \$172.34 + INT \$.00 + COL FEE \$51.70 = \$224.04 10495664

10/17/18

Dear Tanya Bonson,

Your inability to resolve this matter leaves us no alternative but to continue collection activity.

Please contact our office.

FOR YOUR CONVENIENCE, WE ACCEPT VISA, MASTERCARD, DISCOVER AND AUTOPAY (CHECK BY PHONE).

This communication is from a debt collector.

This is an attempt to collect a debt. Any information obtained will be used for that purpose.

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

To make payment online: trafpay.org Office Hours: 8:30-5:00 PM EST MONDAY THROUGH FRIDAY

-	2		SHOW AMOUNT PAID HERE	\$
-		STATEMENT DATE 10/17/18	AMOUNT DUE \$224.04	ACCOUNT # 10495664
Return Servi	ce Requested	SIGNATURE	EX	P DATE
	AI 48195-0667	CARD NUMBER	C	CV# (Last 3 digits on back of card)
PO Box 166		VISA		
			Y CREDIT CARD, FILL	
cs/296/393018591726	Retain the upper portion for yo	our records. Detach and return form belo		1020/0000840/

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Tanya Bonson 403 W North St Dodgeville, WI 53533-1003

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A-1 Collection Service 2297 Highway 33 Suite 906 Hamilton Square, NJ 08690-1717 8-cv-01033 Document #: 1-3 Filed:



Send Payment/Correspondence to: MR\$ BP3, L.L.C. 1930 OLNEY AVENUE CHERRY HILL NJ 08003 844-548-6706 Office Hours : Monday - Thursday 9am - 9pm ET Friday 9am - 5pm ET



November 6, 2018

CREDITOR: CHASE BANK USA N.A. CREDITOR ACCT#: xxxxxxxxx39394 MRS ACCT#: LU4.4194884 ACCOUNT BALANCE: \$801.12

Dear BENJAMIN N BONSON,

The above referenced creditor has placed your account with our office for collection. We recognize that sometimes circumstances or events can make it difficult to satisfy your financial obligations. Resolving an overdue debt is never easy. Often the hardest part is taking the first step. We are ready to assist you to find a solution that is both fair and reasonable by presenting two options that will enable you to resolve your balance with CHASE BANK USA N.A.. We are not obligated to renew these offers.

Option 1: A monthly payment plan to pay the full balance of the account.

Option 2: You are eligible for a discount offer of \$480.72. You pay only \$480.72 in 1 PAYMENT that must be received in this office on or before 12/21/2018.

Payment may be made by calling 844-548-6706, mailing to the above address, or by using our online website at <u>https://mrspay.webview.com</u>. Make payments payable to CHASE BANK USA N.A.

Please contact us if you have any questions, wish to discuss other arrangements, or need additional time to respond to these offers. These offers do not affect your rights set forth below.

IMPORTANT CONSUMER INFORMATION

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 that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request of 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.

Sincerely,

MRS BPO, L.L.C. 844-548-6706

> This is an attempt to collect a debt and any information obtained will be used for that purpose. This communication is from a debt collector.



Ad Astra Recovery Services, Inc. 7330 W. 33rd Street N. Suite 118 Wichita, Kansas 67205

03/07/2018

Creditor: Speedy Cash Account number: 0090-P-005187977

Payment reminder for total balance due \$851.26

Dear Tanya Bonson,

To make a payment please use one of our self-service payment methods

- Using your smart phone scan this code
- Online at http://adastra.statementmanagement.com
- By phone 1-866-398-2089
- Or detach and return the payment slip below.

This letter is to inform you that our client, Speedy Cash has agreed to reduce your debt to it by 25%.

Speedy Cash has agreed to settle your remaining balance of \$851.26 for \$638.45, provided it reaches our office no later than 04/11/2018. If you need additional time to respond to this offer, please contact us. We are not obligated to renew this offer.

Once your payment has been received and has cleared your account, Speedy Cash will consider this issue settled and will not pursue it any further.

If you have any questions or require further assistance, please feel free to call our office at (866) 398-2089.

Once this offer has expired, we are not obligated to renew it.

Send payment today or call us at 866-398-2089 to make payment by card or you may pay online at <u>http://adastra.statementmanagement.com</u> at no additional cost to you. Refer to account# 0090-P-005187977.

This communication is from a debt collector, this is an attempt to collect a debt and any information obtained will be used for that purpose.



1-866-398-2089 (Toll Free)

tia touch 13 n-Thurs: 8AM-8PM CST,

Fri: 8AM-6PM CST,

Sat: 9AM-2PM, CST

and Closed Sunday

Phone

We understand and want to help you

Give us the chance to work with you during this difficult time – we will listen.

We can help create a customized payment plan that works with your current budget.

We have lots of experience assisting people with getting back on financial track. If you allow us we can offer the same help to you.

Phone us 866-398-2089 Your willingness to communicate and work with us is the key to avoiding further collection efforts.

PLEASE SEE BACK OF LETTER FOR IMPORTANT CONSUMER INFORMATION

Please detach and return below portion with your payment.

PO Box 101928 Dept. 1911 Birmingham, AL 35210



32971

Card number	Account 0090-P-005187977 Signature	Total balance due \$851.26
Expiration date	Amount enclosed	

Please call 1-866-398-2089

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Ad Astra Recovery Services, Inc 8918 W. 21st Street N. Suite 200 PMB 303 Wichita, Kansas 67205-1880

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71114-7A 154 Tanya Bonson 403 W North St Dodgeville, WI 53533-1003



8918 W. 21st Street N. Suite 200 PMB 303 Wichita, KS 67205. To speak with a recovery Specialist please call our toll free number – 866-398-2089



Case: 3 GRED 5 GOLLEFT ONd SERVICES of 13

725 Canton Street, Norwood, MA 02062 • 617.581.1076 Fax Number: (617) 658-5710 (use this notice as cover sheet) Self-service: www.ccspayment.com Mon-Fri: 8:00AM-8:00PM, Sat: 9AM-5:30PM, ET



22

CALL CENTER: 1 (617) 581-1076

Date: 08/01/18 File Number: 05 0701 69347 Pin Number: 06973 P165371757 CANCEL DATE: 06/01/2018

3148-B2

CREDITOR:

FARMERS INSURANCE GROUP

AMOUNT OF THE DEBT:

\$522.06

COLLECTION NOTICE - COLLECTION NOTICE

The above referenced amount is due for coverage provided under your insurance contract. Please remit payment to this office by mail (together with the payment stub portion of this notice) or visit our self-service website @ www.ccspayment.com.

If you have any questions, concerns, or would simply like personal assistance, our Customer Service Agents are available during the hours listed above. Thank you.

We are required to make the following statement: This is an attempt to collect a debt and any information obtained will be used for that purpose. This communication is from a debt collector.

FEDERAL LAW: Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request of 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.

SELF-SERVICE WEBSITE: Our self-service website offers the ability to pay by check, MasterCard, Visa, establish a payment plan, print a scheduled payment voucher(s) to mail with payment to this office, review payment history, print a payment-in-full receipt for your records, submit a request to stop telephone calls, and more.

SUBMIT / SEND CORRESPONDENCE: You can visit our self-service website to upload documents, enter information online, print a cover-sheet to send with your correspondence, submit a request to stop telephone calls, and more. If you prefer, you can mail correspondence to: CCS P.O. Box 607, Norwood, MA 02062-0607, or fax to: (617) 658-5710 (please use this notice as your cover sheet).

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

File Number: 05 0701 69347 Pin Number: 06973 TANYA L BONSON

GO GREEN-GO PAPERLESS

We offer secure email messaging as well as the ability to pay or send correspondence online. To activate email messaging or simply self-service online, you can visit our website at the top of this notice. Customer Service Agents are available at (617) 581-1076. Thank you.

HELP PROTECT THE ENVIRONMENT

AMOUNT OF THE DEBT: \$522.06

 Please write your File Number on check (shaded box above). Do not mail post-date checks (call for assistance).

 CCS may process payment as a one-time electronic funds withdrawal using information from your check.

CCS PAYMENT PROCESSING CENTER P.O. BOX 55126 BOSTON, MA 02205-5126

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CREDIT COLLECTION SERVICES

725 Canton Street, Norwood, MA 02062 Self-service: www.ccspayment.com Mon-Fri: 8:00AM-8:00PM, Sat: 9AM-5:30PM, ET

CALL CENTER: (617) 581-1076

32397 1 AB 0.405 T 67 TANYA L BONSON DE2673G 403 W NORTH ST 00-CCS2WNTE-1 0006 DODGEVILLE WI 53533-1003 Image: Construction of the state of t Date: 09/23/18 File Number: 05 0701 69347 Pin Number: 06973 P165371757 CANCEL DATE: 06/01/2018

CREDITOR: FARMERS INSURANCE GROUP

AMOUNT OF THE DEBT: \$522.06

Thank you for your attention at this time. As of 09/23/18, our records indicate that your past-due account remains unpaid. Please respond to this notice.

Please remit payment by mail (together with the payment stub portion of this notice), by telephone, or by visiting our self-service website @ www.ccspayment.com. If you would like to make suitable payment arrangements, our Customer Service Agents are available at (617) 581-1076. Let's work together to resolve this matter. Thank you.

Once full payment has been posted by this office, your account will be closed and returned to your creditor as paid-in-full. We are required to make the following statement: This is an attempt to collect a debt and any information obtained will be used for that purpose. This communication is from a debt collector.



SELF-SERVICE WEBSITE: You can activate email messaging, upload correspondence, request telephone calls to stop, pay by check, Visa, MasterCard, arrange a payment plan, and more at our secure website: www.ccspayment.com.



CALL CENTER: You can receive personal attention from a Customer Service Agent during the hours referenced at the top of this notice: (617) 581-1076.



MAIL PAYMENT: You can mail your check together with the payment stub portion of this notice to: CCS Payment Processing Center, P.O. Box 55126, Boston, MA 02205-5126.

MAIL OR FAX CORRESPONDENCE: You can mail correspondence to: CCS P.O. Box 607, Norwood, MA 02062-0607 or fax to: (617) 658-5710. You can include a copy of this notice to avoid processing delays.

File Number: 05 0701 69347 Pin Number: 06973 TANYA L BONSON

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



We offer secure email messaging, as well as the ability to pay or send correspondence online. It's quick, easy, and helps protect the environment. Please consider visiting our self-service website at: www.ccspayment.com. PLEASE PAY THIS AMOUNT: \$522.06

Do not mail post-dated checks. You can call (617) 581-1076 for personal attention. CCS may process payment as a one-time electronic funds withdrawal using information from your check.

CCS PAYMENT PROCESSING CENTER P.O. BOX 55126 BOSTON, MA 02205-5126

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CREDITIOGOL MEGTION SERVICES 13

725 Canton Street, Norwood, MA 02062 Self-service: www.SettlementNotice.com Mon-Fri: 8:00AM-8:00PM, Sat: 9AM-5:30PM, ET

CALL CENTER: (603) 363-1021



39023 1 AB 0.405 T 79 TANYA L BONSON D028852 403 W NORTH ST 00-CCS2WHE-1 0000 DODGEVILLE WI 53533-1003 Date: 10/14/18 File Number: 05 0701 69347 Pin Number: 06973 P165371757 CANCEL DATE: 06/01/2018

REGARDING: FARMERS INSURANCE GROUP

We offer secure email messaging, as well as the ability to pay or

send correspondence online. It's quick, easy, and helps protect the environment. Please consider visiting our self-service website

at: www.SettlementNotice.com.

AMOUNT OF THE DEBT: \$522.06

SETTLEMENT OPPORTUNITY Thank you for your attention at this time. This is an opportunity to settle your past-due account at a discount. Please respond to this notice. Please visit our self-service website @ www.SettlementNotice.com or contact our call center to discuss suitable settlement terms with a Customer Service Agent. Let's work together to resolve this matter. Thank you. Once the agreed upon settlement amount has been posted by this office, your account will be closed and returned to your creditor as settled-in-full. We are required to make the following statement: This is an attempt to collect a debt and any information obtained will be used for that purpose. This communication is from a debt collector. SELF-SERVICE WEBSITE: You can activate email messaging, upload correspondence, request telephone calls to stop, pay by check, Visa, MasterCard, arrange a payment plan, and more at our secure website: www.SettlementNotice.com. CALL CENTER: You can receive personal attention from a Customer Service Agent during the hours referenced at the top of this notice: (603) 363-1021. MAIL PAYMENT: You can mail your check together with the payment stub portion of this notice to: CCS Payment Processing Center, P.O. Box 55126, Boston, MA 02205-5126. MAIL OR FAX CORRESPONDENCE: You can mail correspondence to: CCS P.O. Box 607, Norwood, MA 02062-0607 or fax to: (617) 658-5710. You can include a copy of this notice to avoid processing delays. 0080 - WI File Number: 05 0701 69347 AMOUNT OF THE DEBT: Pin Number: 06973 \$522.06 TANYA L BONSON Do not mail post-dated checks. You can call (603) 363-1021 for personal This collection agency is licensed by the Division of Banking attention. CCS may process payment as a one-time electronic funds in the Wisconsin Department of Financial Institutions, withdrawal using information from your check. www.wdfi.org CCS

CCS Payment processing center P.O. Box 55126 Boston, Ma 02205-5126

597000080070169347000522067

PO Box 2288 La Crosse WI 54602-2288 RETURN SERVICE REQUESTED

018867603

Dodgeville WI 53533-1003

Tanya Bonson 403 W North St

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07842 F.L.4% TW

Case: 3:18-cv-01033 Document #: 1-3

Debt Collection Agency Telephone Number: (608) 791-2143 Toll Free: (888) 378-2375

Filed: 12/12

Date	Account #	Amount
7/6/2018	2112763	\$1997.01

To pay by credit card, see reverse side.

Detach Upper Portion And Return With Payment

Creditor: KWIK TRIP INC

Account #: 2112763 Balance: \$1997.01



This account has been listed with Credit Bureau Data, Inc. for collection in full. In order to prevent further collection efforts it is important that you give this matter your attention.

When you provide a check as payment, you authorize us either to use the information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. For inquiries, please call 608-791-2143.

Payments can be made online at http://www.paycbd.com/. Please use the following: Account - 2112763 and Entry Code - 1630X298376.

>>>>> IMPORTANT NOTICE <<<<<

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you 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.

>>>>NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION <<<<<

This is a communication from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.

Please return the upper portion of this notice with your payment in the enclosed envelope, or bring your payment to: Credit Bureau Data, Inc. • 518 State St • La Crosse WI 54601-3326.

20NDATA101

Credit Bureau Data, Inc. • 518 State St • La Crosse WI 54601-3326 • (608) 791-2143 • (888) 378-2375

Case: 3:18-cv-01033 Document #: 1-3 Filed: 12/12/18 Page 9 of 13

D NS4		CHECK CARD USING FOR PAYMENT	
CARD NUMBER	PLUS 3 DIGIT SE	CURITY CODE (on back of card)	EXP. DATE
CARDHOLDER N/		1.0.18	AMOUNT \$

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

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Gaseli3:18-cy-01033 Document #: Account Number: 600608547242068

Associates, LLC

10/02/2018

Dear TANYA BONSON,

Your account was sold to Portfolio Recovery Associates, LLC. Your bank or creditor made a business decision to sell your debt.

Please reach out to us. Our goal is to work collaboratively to help you resolve your debt.

Portfolio Recovery Associates, LLC purchased your account on 09/18/2018. All future payments for this account, including credit counseling service payments, should be directed to us.

We know life happens. Please visit our website. It will help you understand the process, your options, and—most importantly—how we're committed to working together to design a payment plan to resolve your outstanding obligation.

Sincerely, PORTFOLIO RECOVERY ASSOCIATES, LLC Account Number: 6006608547242069/C 10 01 13 Seller: CAPITAL ONE N.A. Merchant: MAURICES Original Creditor: COMENITY BANK Original Creditor Address: ONE RIGHTER PKWY SUITE 100 WILMINGTON DE 19803 Creditor to Whom Debt is Owed: PORTFOLIO RECOVERY ASSOCIATES, LLC Balance: \$775.60

Account Details

Contact Us

Paying your bill is easy with any of these options:

www.PRApay.com

1-800-772-1413 Mon. to Fri. 8am - 11pm. Sat. 8am - 8pm Sun. 11am - 10pm (EST)

Pay by mail – checks and payments to: PORTFOLIO RECOVERY ASSOCIATES, LLC P.O. Box 12914 Norfolk VA 23541

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you 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.

This communication is from a debt collector and is an attempt to collect a debt. Any information obtained will be used for that purpose.

Notice: See Reverse Side for Important Information

DEPT 922 PO BOX 4115 CONCORD CA 94524

Account Number: 0000008547242068

Payment Amount:

CHANGE SERVICE REQUESTED

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TANYA BONSON 403 W NORTH ST DODGEVILLE WI 53533-1003 Pay Online at www.PRApay.com or mail to:

PORTFOLIO RECOVERY ASSOCIATES, LLC P.O. Box 12914 Norfolk VA 23541

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Case: 3:18-cv-01033 Document #: 1-3 Filed: 12/12/18 Page 11 of 13

MAKE ALL CHECKS PAYABLE TO: PORTFOLIO RECOVERY ASSOCIATES, LLC

SEND ALL PAYMENTS TO: PORTFOLIO RECOVERY ASSOCIATES, LLC, P.O. Box 12914, Norfolk, VA 23541

HOURS OF OPERATION: Mon. to Fri. 8am - 11pm, Sat. 8am - 8pm, Sun. 11am - 10pm (EST)

COMPANY ADDRESS: Portfolio Recovery Associates, LLC, 120 Corporate Boulevard, Norfolk, VA 23502

DISPUTES: Call 1-800-772-1413 or write to: Portfolio Recovery Associates, LLC, Disputes Department, 140 Corporate Blvd., Norfolk, VA 23502

DISPUTES E-MAIL ADDRESS: PRA_Disputes@portfoliorecovery.com

QUALITY SERVICE AVAILABLE Mon. - Fri. 8 AM to 6 PM (EST)

S6888502529

Not happy with the way you were treated? Our company strives to provide professional and courteous service to all our customers. Contact one of our staff to discuss issues related to our quality of service to you by phone at 1-800-772-1413 or by e-mail at PRACustomerCare@portfoliorecovery.com.

PRIVACY NOTICE: We collect certain personal information about you from the following sources: (a) information we received from you; (b) information about your transactions with our affiliates, others, or us; (c) information we receive from consumer reporting agencies. We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law. We restrict access to nonpublic information about you to those employees and entities that need to know that information in order to collect your account. We maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

NOTICE: If this account is eligible to be reported to the credit reporting agencies by our company, we are required by law to notify you that a negative credit report reflecting on your credit records may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligation.

P3 Po Ro 18 - CV-01033

Associates, LLC

10/20/2018

Dear TANYA BONSON,

Your account was sold to Portfolio Recovery Associates, LLC. Your bank or creditor made a business decision to sell your debt.

Please reach out to us. Our goal is to work collaboratively to help you resolve your debt.

Portfolio Recovery Associates, LLC purchased your account on 07/19/2018. All future payments for this account, including credit counseling service payments, should be directed to us.

We know life happens. Please visit our website. It will help you understand the process, your options, and-most importantly-how we're committed to working together to design a payment plan to resolve your outstanding obligation.

Sincerely, PORTFOLIO RECOVERY ASSOCIATES, LLC

Account Details

Document #: 1 Account Number: 6032203673136809 Seller: SYNCHRONY BANK Merchant: WAL-MART Original Creditor: SYNCHRONY BANK Original Creditor Address: P.O. BOX 965033 ORLANDO FL 328965033 Creditor to Whom Debt is Owed: PORTFOLIO RECOVERY ASSOCIATES, LLC

Balance: \$1,160.63

Contact Us

Paying your bill is easy with any of these options:

www.PRApay.com

1-800-772-1413 Mon. to Fri. 8am - 11pm. Sat. 8am - 8pm Sun. 11am - 10pm (EST)

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Notice: See Reverse Side for Important Information

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DEPT 922 PO BOX 4115 CONCORD CA 94524 Account Number: 6032203673136809

Payment Amount:

CHANGE SERVICE REQUESTED

TANYA BONSON 403 W NORTH ST DODGEVILLE WI 53533-1003 Pay Online at www.PRApay.com or mail to:

PORTFOLIO RECOVERY ASSOCIATES, LLC P.O. Box 12914 Norfolk VA 23541

Case: 3:18-cv-01033 Document #: 1-3 Filed: 12/12/18 Page 13 of 13

MAKE ALL CHECKS PAYABLE TO: PORTFOLIO RECOVERY ASSOCIATES, LLC

SEND ALL PAYMENTS TO: PORTFOLIO RECOVERY ASSOCIATES, LLC, P.O. Box 12914, Norfolk, VA 23541

HOURS OF OPERATION: Mon. to Fri. 8am - 11pm, Sat. 8am - 8pm, Sun. 11am - 10pm (EST)

COMPANY ADDRESS: Portfolio Recovery Associates, LLC, 120 Corporate Boulevard, Norfolk, VA 23502

DISPUTES: Call 1-800-772-1413 or write to: Portfolio Recovery Associates, LLC, Disputes Department, 140 Corporate Blvd., Norfolk, VA 23502 DISPUTES E-MAIL ADDRESS: PRA_Disputes@portfoliorecovery.com

QUALITY SERVICE AVAILABLE Mon. - Fri. 8 AM to 6 PM (EST)

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NOTICE: If this account is eligible to be reported to the credit reporting agencies by our company, we are required by law to notify you that a negative credit report reflecting on your credit records may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligation.

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: <u>A-1 Collection Service Falsely Claimed to be Licensed in Wisconsin, Class Action Alleges</u>