

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.)

I. (a) PLAINTIFFS

Michael Bouie, individually and on behalf of all others similarly situated

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

(c) Attorneys (Firm Name, Address, and Telephone Number)
Cary L. Flitter, Esq., Andrew Milz, Esq., Jody López-Jacobs, Esq.
Flitter Milz, P.C., 450 N. Narberth Avenue, Narberth, PA 19072, (610) 266-7863

DEFENDANTS

The Law Offices of Frederic I. Weinberg, & Associates P.C. Frederic I. Weinberg, Jefferson Capital Systems, LLC

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

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

Attorneys (If Known)

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

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

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

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

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

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY - <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from Another District (specify)
- 6 Multidistrict Litigation - Transfer
- 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
15 U.S.C. § 1692
Brief description of cause:
Violation of Fair Debt Collection Practices Act

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ _____ CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE Dec 11, 2017 SIGNATURE OF ATTORNEY OF RECORD 

FOR OFFICE USE ONLY
RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

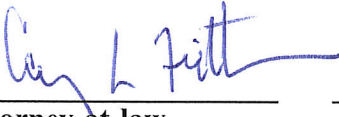
CASE MANAGEMENT TRACK DESIGNATION FORM

Michael Bouie, individually and on behalf of all	:	CIVIL ACTION
others similarly situated	:	
	:	
v.	:	
The Law Offices of Frederic I. Weinberg & Associates,	:	
P.C., Frederic I. Weinberg & Jefferson Capital Systems; LLC	:	NO.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) (X)
- (f) Standard Management – Cases that do not fall into any one of the other tracks. ()

<u>Dec 11, 2017</u>	<u></u>	<u>CARY L. FLITTER</u>
Date	Attorney-at-law	Attorney for
<u>610-822-0782</u>	<u>610-667-0552</u>	<u>cfitter@consumerslaw.com</u>
Telephone	FAX Number	E-Mail Address

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 6901 Cresheim Road, Philadelphia, PA 19119

Address of Defendant: 375 E. Elm Street, Suite 210, Conshohocken, PA 19428; 16 McLeland Road, Saint Cloud, MN 56303

Place of Accident, Incident or Transaction: Philadelphia, PA 19119

(Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes No

Does this case involve multidistrict litigation possibilities?

Yes No

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

- 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? Yes No
- 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? Yes No
- 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court? Yes No
- 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? Yes No

CIVIL: (Place in ONE CATEGORY ONLY)

A. Federal Question Cases:

- 1. Indemnity Contract, Marine Contract, and All Other Contracts
- 2. FELA
- 3. Jones Act-Personal Injury
- 4. Antitrust
- 5. Patent
- 6. Labor-Management Relations
- 7. Civil Rights
- 8. Habeas Corpus
- 9. Securities Act(s) Cases
- 10. Social Security Review Cases
- 11. All other Federal Question Cases
(Please specify) Fair Debt Collection Practices Act

B. Diversity Jurisdiction Cases:

- 1. Insurance Contract and Other Contracts
- 2. Airplane Personal Injury
- 3. Assault, Defamation
- 4. Marine Personal Injury
- 5. Motor Vehicle Personal Injury
- 6. Other Personal Injury (Please specify)
- 7. Products Liability
- 8. Products Liability — Asbestos
- 9. All other Diversity Cases
(Please specify) _____

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, CARY L. FLITTER, counsel of record do hereby certify:

- Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- Relief other than monetary damages is sought.

DATE: Dec 11, 2017

Cary L Flitter

Attorney-at-Law

35047

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: Dec 11, 2017

Cary L Flitter

Attorney-at-Law

35047

Attorney I.D.#

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL BOUIE, *individually and on
behalf of all others similarly situated*
6901 Cresheim Rd
Philadelphia, PA 19119,

Plaintiff

vs.

THE LAW OFFICES OF FREDERIC I.
WEINBERG & ASSOCIATES, P.C.
375 E. Elm Street, Suite 210
Conshohocken, PA 19428,

FREDERIC I. WEINBERG,
375 E. Elm Street, Suite 210
Conshohocken, PA 19428,

JEFFERSON CAPITAL SYSTEMS, LLC,
16 McLeland Road
Saint Cloud, MN 56303,

Defendants

CIVIL ACTION

NO.

CLASS ACTION COMPLAINT

I. INTRODUCTION

1. This is an action for damages brought by a consumer pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 (“FDCPA”).

2. The FDCPA requires a mandatory initial validation notice as an informal dispute mechanism. 15 U.S.C. § 1692g. The validation notice provides the consumer a 30 day period in which to act. Defendants must not shorten the time period the consumer has to dispute the debt nor give misleading information as to how to make the dispute.

3. Defendants are subject to strict liability for sending an initial collection letter to Plaintiff which impermissibly shortened the time the consumer had to make a dispute.

4. Mr. Bouie hereby seeks relief under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 (“FDCPA”).

II. JURISDICTION

5. Subject matter jurisdiction of this court arises under 15 U.S.C. § 1692k and 28 U.S.C. § 1331, 1337.

III. PARTIES

6. Plaintiff Michael Bouie (“Plaintiff”) is a consumer who resides in Philadelphia, Pennsylvania at the address captioned.

7. Defendant The Law Offices of Frederic I. Weinberg & Associates, P.C. (“Weinberg Law”) is a Pennsylvania law firm, which has an office for the regular transaction of business at the address captioned.

8. Weinberg Law regularly engages in the collection of consumer debts by the use of the mails and telephone.

9. Weinberg Law regularly attempts to collect debts alleged to be due another.

10. Weinberg Law regularly files lawsuits to collect debts allegedly due.

11. Weinberg Law regularly engages in business in the Eastern District of Pennsylvania.

12. Weinberg Law is a “debt collector” as that term is contemplated in the FDCPA, 15 U.S.C. § 1692a(6).

13. Defendant Frederic I. Weinberg is a corporate officer for Weinberg Law.

14. Mr. Weinberg is the president, treasurer, and vice president of Weinberg Law.

15. Mr. Weinberg has an office for the regular transaction of business at the address captioned.

16. Mr. Weinberg regularly engages in the collection of consumer debts by the use of the mails and telephone.

17. Mr. Weinberg regularly attempts to collect debts alleged to be due another.

18. Mr. Weinberg regularly files lawsuits to collect debts allegedly due.

19. Mr. Weinberg regularly sends collection letters out to debtors for the purpose of collecting debts.

20. Mr. Weinberg exercises control over the activities of Weinberg Law. Such activities include but are not limited to the decision to include and exclude certain language in the collection letters used by Weinberg Law.

21. Mr. Weinberg is a “debt collector” as that term is contemplated in the FDCPA, 15 U.S.C. § 1692a(6).

22. Defendant Jefferson Capital Systems, LLC. (“Jefferson”) is a nationwide debt collector with a principal place of business at the address captioned.

23. Jefferson regularly uses the mail and telephone to attempt to collect consumer debts alleged to be due another.

24. Jefferson is a purchaser of charged-off consumer debts.

25. Jefferson regularly files lawsuits to collect debts allegedly due.

26. Jefferson regularly engages in business in the Eastern District of Pennsylvania.

27. Jefferson is a “debt collector” as that term is contemplated in the FDCPA, 15 U.S.C. §1692a(6).

28. Jefferson engaged Weinberg Law to collect the accounts here in issue.

29. Jefferson is responsible for the acts of its collector, Weinberg Law.

IV. STATEMENT OF CLAIM

30. Defendant Weinberg Law sent Mr. Bouie a collection letter dated May 9, 2017, attempting to collect an alleged consumer debt due to Defendant Jefferson. *See* Exhibit “A.”

31. The letter states in relevant part:

Unless this office hears from you within thirty (30) days after receipt of this letter that you dispute the validity of the debt, or any portion thereof, this office will assume the debt is valid.

32. This misstates the consumer’s right.

33. The FDCPA, at 15 U.S.C. § 1692g(a) requires a debt collector to include in its initial communication to the debtor, among other things, a statement that the debtor may dispute and seek validation of the alleged debt from the debt collector. 15 U.S.C. § 1692g(a). § 1692g of the Act goes on to state that:

If the consumer notifies the debt collector in writing within the 30 day period as 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 the 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.

15 U.S.C. § 1692g(b).

34. Weinberg Law’s statement limits improperly the time that a consumer may request verification of the debt by stating that it must “hear[] from you” within thirty days of the consumer’s receipt of the letter.

35. The debt collector does not have to receive a verification request within 30 days for the consumer’s request to be valid and timely. Rather, the consumer must send the written

verification request within 30 days of receiving the letter with the notice of the consumer right to verification.

36. Weinberg Law's characterization, "Unless this office hears from you" further compounds the damage of the impermissibly shortened time frame in which to respond because a consumer who believes there is insufficient time for a letter to be received within 30 days may attempt to request verification over the phone, which does not trigger the verification right.

37. A consumer who telephones in response to Defendant's invitation to "hear from you" will not have protected his verification rights.

CLASS ALLEGATIONS

38. Mr. Bouie brings this action on his own behalf and on behalf of a Class designated pursuant to Rules 23(a) and 23(b)(3) of the Federal Rules of Civil Procedure.

39. Plaintiff proposes to define the Class as follows:

- a. All persons with addresses within the Eastern District of Pennsylvania;
- b. who were sent an initial letter from Defendant Weinberg Law on behalf of Defendant Jefferson, in an attempt;
- c. to collect a consumer debt allegedly due;
- d. where the initial collection letter stated :
 1. "Unless [we/this office] [hears] from you within thirty days (30 days) after receipt of this letter that you dispute the validity of the debt, or any portion thereof, this office will assume the debt is valid."; and
- e. where the letter(s) bears a send date of December 11, 2016 to December 11, 2017.

40. The Class is believed to be so numerous that joinder of all members is impractical. This Complaint concerns mass-produced form collection letters.

41. There are questions of law or fact common to the Class. These include:

- a. Whether Defendants' form letter violates the Fair Debt Collection Practices Act by failing to notify the consumer of his or her right to dispute the validity of the debt within 30 days of receipt;
- b. Whether the letter suggests or implies that a call or oral dispute will protect the consumer's validation rights;
- c. Whether and what amount of statutory damages are recoverable class-wide by Plaintiff and the Class for Defendants' violation.

42. Plaintiff's claims are typical of the claims of the Class. Plaintiff and all Class Members were mailed the collection letter with the same language. All claims are based on the same factual and legal theories, and there are no individualized issues.

43. Plaintiff will fairly and adequately protect the interests of the Class. Plaintiff has no interests antagonistic to those of the Class and Plaintiff's counsel is competent and experienced in consumer credit cases and class actions.

44. The questions of law or fact common to the Class predominate over any questions affecting only individual members, and a class action is superior to other available methods for the fair and efficient adjudication of this controversy. The Class Members are consumer debtors, who may be unable to locate or afford to hire lawyers. Most are probably unaware that their rights, and the FDCPA, have been violated.

45. The Class may be certified under Fed. R. Civ. P. 23(b)(3), as such represents a superior method for the fair and efficient adjudication of this controversy in that:

- a. Congress specifically contemplated FDCPA class actions as a principal means of enforcing the statute by private attorneys general. 15 U.S.C. § 1692k.
- b. The interest of Class Members in individually controlling the prosecution of separate claims against debt collectors is small because the maximum statutory damages available in an individual action under the Act is \$1,000.00.
- c. This class action covering consumers within the geographic boundaries of Eastern District of Pennsylvania is likely to be easily manageable.
- d. The case may require expert testimony, the substantial cost of which may be spread among the Class Members.

COUNT I

FAIR DEBT COLLECTION PRACTICES ACT

46. Plaintiff repeats the allegations contained above as if the same were here set forth at length.

47. Defendants' actions violated 15 U.S.C. § 1692g of the Fair Debt Collection Practices Act by shortening the time the consumer has to dispute the debt, and by suggesting that an oral dispute is sufficient.

WHEREFORE, Plaintiff Michael Bouie demands judgment against Defendants The Law Offices of Frederic I. Weinberg & Associates, P.C., Frederic I. Weinberg, and Jefferson Capital Systems, LLC:

- (a) Awarding damages to Plaintiff and to the Class as provided in 15 U.S.C. § 1692k(a);

(b) Awarding Plaintiff and the Class their costs and reasonable attorney's fees;

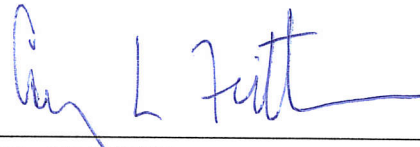
and

(c) Granting such other relief as may be deemed just and proper.

V. **DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury as to all issues so triable.

Respectfully submitted:



Date: Dec. 11, 2017

CARY L. FLITTER
ANDREW M. MILZ
JODY THOMAS LÓPEZ-JACOBS
Attorneys for Plaintiff

FLITTER MILZ, P.C.
450 N. Narberth Ave., Ste. 101
Narberth, PA, 19072
(610) 822-0782

EXHIBIT "A"

FREDERIC I. WEINBERG**
JOEL M. FLINK*
ASHLEY A. PALAJA*
JOHN P. UETZ*
ALEXA L. HEISLER*



375 E. ELM STREET
SUITE 210
CONSHOHOCKEN, PA 19428

1200 LAUREL OAK ROAD
SUITE 104
VOORHEES, NJ 08043

PHONE: (484) 351-0500
FACSIMILE: (484) 351-0501

TOLL FREE: (866) 465-8087

(Reply to PA Office)

**Also Member of NJ and CO Bars
*Also Member of NJ Bar

May 9, 2017

MICHAEL BOUIE
6901 CRESHEIM RD
PHILADELPHIA PA 19119-0000

RE: Creditor : JEFFERSON CAPITAL SYSTEMS, LLC
Original Creditor : WEBBANK
Current Balance Due : ██████████
My File No : ██████████0700
Original Account No. : XXXXXXXXXXXXX5276

MICHAEL BOUIE

Your account in the above matter has been referred to this office for collection. As of the date of this letter, the above amount is due.

Unless this office hears from you within thirty (30) days after receipt of this letter that you dispute the validity of the debt, or any portion thereof, this office will assume the debt is valid. If you notify this office in writing within thirty (30) days of your receipt of this letter that the debt or any portion thereof is disputed, this office will obtain verification of the debt or, if the debt is founded upon a judgment, a copy of the judgment will be obtained, and this office will mail to you a copy of such verification or judgment. Upon written request within thirty (30) days of your receipt of this letter, this office will provide you with the name and address of the original creditor, if different from the current creditor.

The Law Offices of Frederic I. Weinberg & Associates, P.C. is a debt collector. This letter is an attempt to collect a debt and any information obtained will be used for that purpose.

Very truly yours,

The Law Offices of Frederic I. Weinberg
& Associates, P.C.

D101R

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Law Offices of Frederic I. Weinberg & Associates Among Defendants in FDCPA Class Action](#)
