

LAWRENCE C. HERSH

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Rutherford, NJ 07070
(201) 507-6300

Attorney for Plaintiff, on behalf of himself and all others similarly situated

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

_____	X	
	:	
DYLAN BROWN, on behalf of himself and all	:	
other similarly situated,	:	
	:	
Plaintiff,	:	Civil Action No.
	:	
vs.	:	CLASS ACTION COMPLAINT AND
	:	JURY TRIAL DEMAND
ARMAND LAW GROUP, PLLC and AARGON	:	
AGENCY, INC.,	:	
	:	
DefendantS.	:	
	:	
_____	X	

Plaintiff DYLAN BROWN, on behalf of himself and all others similarly situated (hereinafter "Plaintiff"), by and through his undersigned attorney, alleges against the above-named Defendants ARMAND LAW GROUP, PLLC ("ARMAND LAW GROUP") and AARGON AGENCY, INC. ("AARGON") (collectively "Defendants"), their employees, agents, and successors, the following:

PRELIMINARY STATEMENT

- 1. Plaintiff brings this action for damages and declaratory and injunctive

relief arising from the Defendants' violation of 15 U.S.C. § 1692 *et seq.*, the Fair Debt Collection Practices Act (hereinafter "FDCPA"), which prohibits debt collectors from engaging in abusive, deceptive and unfair practices.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this action pursuant to 28 U.S.C. §1331.

This is an action for violations of 15 U.S.C. § 1692 *et seq.*

3. Venue is proper in this district under 28 U.S.C. §1391(b) because jurisdiction is not founded solely on diversity of citizenship and Plaintiff resides in this jurisdiction.

DEFINITIONS

4. As used in reference to the FDCPA, the terms "creditor," "consumer," "debt," and "debt collector" are defined in § 803 of the FDCPA and 15 U.S.C. § 1692a.

JURY DEMAND

5. Plaintiff demands a jury trial on all issues.

PARTIES

6. The FDCPA, 15 U.S.C. § 1692 *et seq.*, which prohibits certain debt collection practices provides for the initiation of court proceedings to enjoin violations of the FDCPA and to secure such equitable relief as may be appropriate in each case.

7. Plaintiff is a natural person and resident Monmouth of County and the State of New Jersey, and is a "Consumer" as defined by 15 U.S.C. § 1692a(3).

8. Based upon information and belief, Defendant ARMAND LAW GROUP, PLLC is a law practice in the State of Nevada with its principle place of business located at 8668 Spring Mount Road, Suite 110, Las Vegas, NV 89117.

9. Based upon information and belief, Defendant AARGON AGENCY INC. is a collection agency with a principle place of business located at 8668 Spring Mount Road, Las Vegas, NV 89117.

10. Upon information and belief, Defendants are companies that use the mail, telephone, and facsimile and regularly engages in business the principal purpose of which is to attempt to collect debts alleged to be due another. Defendants are each a “Debt Collector” as that term is defined by 15 U.S.C. §1692(a)(6).

CLASS ACTION ALLEGATIONS

11. Plaintiff brings this action as a state wide class action, pursuant to Rule 23 of the Federal Rules of Civil Procedure (hereinafter “FRCP”), on behalf of himself and all New Jersey consumers and their successors in interest (the “Class”), who have received debt collection letters and/or notices from the Defendants which are in violation of the FDCPA, as described in this Complaint.

12. This Action is properly maintained as a class action. The Class consists of:

- All New Jersey consumers who were sent letters and/or notices from Defendants which contained at least one of the alleged violations of 15 U.S.C. § 1692 et seq. as set forth herein.
- The Class period begins one year prior to February 18, 2017.

13. The Class satisfies all the requirements of Rule 23 of the FRCP for

maintaining a class action:

- Upon information and belief, the Class is so numerous that joinder of all members is impracticable because there are hundreds and/or thousands of persons who have received debt collection letters and/or notices from the Defendants that violate specific provisions of the FDCPA. Plaintiff is complaining of a standard form letter and/or notice that is sent to hundreds of persons (*See **Exhibit A***, except that the undersigned attorney has, in accordance with Fed. R. Civ. P. 5.2 partially redacted the financial account numbers in an effort to protect Plaintiff's privacy);
- There are questions of law and fact which are common to the Class and which predominate over questions affecting any individual Class member. These common questions of law and fact include, without limitation:
 - a. Whether Defendants violated various provisions of the FDCPA, including, but not limited to: 15 U.S.C. §§1692e, 1692e(2), 1692e(3); 1692e(5); and 1692e(10) 1692f and 1692g;
 - b. Whether Defendants misrepresented the amount of the alleged debt;
 - c. Whether the Defendants demanded an amount owed that was greater than the actual balance due;
 - d. Whether Defendant Armand Law Group, who are not New Jersey attorneys, can send collection letters into New Jersey.

- e. Whether Plaintiff and the Class have been injured by the Defendants' conduct;
 - f. Whether Plaintiff and the Class have sustained damages and are entitled to restitution as a result of Defendants' wrongdoing, and if so, what is the proper measure and appropriate statutory formula to be applied in determining such damages and restitution; and
 - g. Whether Plaintiff and the Class are entitled to declaratory and/or injunctive relief.
- Plaintiff's claims are typical of the Class, which all arise from the same operative facts and are based on the same legal theories;
 - Plaintiff has no interest adverse or antagonistic to the interest of the other members of the Class;
 - Plaintiff will fairly and adequately protect the interest of the Class and have retained experienced and competent attorneys to represent the Class;
 - A Class Action is superior to other methods for the fair and efficient adjudication of the claims herein asserted. Plaintiff anticipates that no unusual difficulties are likely to be encountered in the management of this class action;
 - A Class Action will permit large numbers of similarly situated persons to prosecute their common claims in a single forum simultaneously and without the duplication of effort and expense that numerous

individual actions would engender. Class treatment will also permit the adjudication of relatively small claims by many Class members who could not otherwise afford to seek legal redress for the wrongs complained of herein. Absent a Class Action, class members will continue to suffer losses of statutory protected rights as well as monetary damages. If Defendants' conduct is allowed to proceed without remedy it will continue to reap and retain the proceeds of its ill-gotten gains;

- Defendants have acted on grounds generally applicable to the entire Class, thereby making appropriate final injunctive relief or corresponding declaratory relief with respect to the Class as a whole.

STATEMENT OF FACTS

14. Plaintiff is at all times relevant to this lawsuit, a "consumer" as that term is defined by 15 U.S.C. §1692a(3).

15. Prior to February 18 2016, Plaintiff allegedly incurred a financial obligation to DJO Global.

16. The DJO Global obligation arose out of a transaction in which money, property, insurance or services, which are the subject of the transaction, are primarily for personal, family or household purposes.

17. The alleged DJO Global obligation is a "debt" as defined by 15 U.S.C. § 1692a(5).

18. DJO Global is a "creditor" as defined by 15 U.S.C. § 1692a(4).

19. At some time prior to February 18, 2016, the DJO Global obligation became past due.

20. At some point prior to February 18, 2016, the DJO Global obligation was referred for collection to Defendants.

21. On or about February 18, 2016, Plaintiff received a collection letter from Defendants dated February 18, 2016, a copy of which is attached as Exhibit A.

22. The February 18, 2016 collection letter indicated a Total Balance due of \$30.65, comprised of an amount owed of \$30.00 and interest accrued of \$0.65.

23. The February 18, 2016 letter indicated in relevant part:

AARGON will attempt to collect this debt through traditional debt collection practices. If AARGON is unsuccessful in collection this debt on their own, they may review the account and make a determination as to whether or not to pursue legal action to recover this debt. In the event that AARGON elect to pursue this debt through litigation, your account may be forwarded to our office for an independent review by one of our attorneys and if necessary forwarded to a law firm in your area from our network.

24. The February 18, 2015 letter is signed by Danial Ryan.

25. Based upon information and belief neither Armand Fried, Esq. or Daniel Ryan were licensed to practice law in New Jersey at the time the February 18, 2016 collection letter was sent.

26. The February 10, 2015 letter included the following Nevada address on the letterhead:

Armand Law Group, PLLC
8668 Spring Mountain Road Suite:110
Las Vegas NV 89117

27. The February 18, 2016 letter demanded \$0.65 in interest that Defendants were not entitled to collect.

28. Plaintiff did not owe the \$0.65, or if he did, it was an unreasonable interest charge.

29. The February 18, 2016 letter was sent to Plaintiff in connection with the collection of the DJO Global obligation.

30. The February 18, 2016 letter was a “communication” as defined by 15 U.S.C. §1692a(2).

31. Defendants’ use the February 18, 2016 letter would confuse the least sophisticated consumer as to whether Defendant Armand Law Group was meaningfully involved in the matter as an attorney, and if so, to what degree of involvement.

32. The overall impression of Defendants’ February 18, 2016 collection letter, or ones substantially similar to the collection letter, implied or threatened potential legal action.

33. Any language in the February 18, 2016 letter indicating that no attorney has personally reviewed Plaintiff’s account is confusing, since the letter is sent on an attorney’s letterhead.

34. Defendants’ collection letter, or the same or substantially similar to Defendants’ February 18, 2016 letter, falsely implied that an attorney is meaningfully involved in collecting the consumer debts at issue.

35. The FDCPA prohibits a debt collector from falsely representing or implying that any individual is an attorney or that any communication is from an attorney if, in fact, no attorney reviewed the debt. *See Martsoff v. JBC Legal Group, P.C.*, 2008

U.S. Dist. LEXIS 6876, 2008 WL 275719 (M.D. Pa. Jan. 30, 2008); Lesh v. Law Offices of Mitchell N. Kay, PC, 650 F.3d 993 (3rd Cir. 2011); and 15 U.S.C. § 1692e(3).

36. Defendants' February 18, 2016 letter sent to Plaintiff and others similarly situated does not comply with the FDCPA. *See* Smith v. Michael Harrison, Esquire, 2008 U.S. Dist. LEXIS 51685 (D.N.J. July 7, 2008); Lesh v. Law Offices of Mitchell N. Kay, PC, 650 F.3d 993 (3rd Cir. 2011).

37. Within the last year, Defendants sent collection letters to numerous New Jersey consumers that included a demand for an amount that was greater than the amount actually due at the time the collection letters were sent.

38. Within the last year, Defendants sent collection letters to numerous New Jersey consumers that included a demand for an amount that included interest that Defendants were not entitled to collect.

39. Within the last year, Defendants sent collection letters to numerous New Jersey consumers falsely implying or threatening legal action, although neither Defendants nor any attorneys in their office were licensed in the State of New Jersey.

40. Plaintiff suffered injury in fact by being subjected to unfair and abusive practices of the Defendants.

41. Plaintiff suffered actual harm by being the target of the Defendants' misleading debt collection communications.

42. Defendants violated the Plaintiff's right not to be the target of misleading debt collection communications.

43. Defendants violated the Plaintiff's right to a truthful and fair debt collection process.

44. Defendants used materially false, deceptive, misleading representations and means in its attempted collection of Plaintiff's alleged debt.

45. Defendants' communications were designed to cause the debtor to suffer a harmful disadvantage in charting a course of action in response to Defendants' collection efforts.

46. The FDCPA ensures that consumers are fully and truthfully apprised of the facts and of their rights, the act enables them to understand, make informed decisions about, and participate fully and meaningfully in the debt collection process. The purpose of the FDCPA is to provide information that helps consumers to choose intelligently. The Defendants' false representations misled the Plaintiff in a manner that deprived her of her right to enjoy these benefits, these materially misleading statements trigger liability under section 1692e of the Act.

47. These deceptive communications additionally violated the FDCPA since they frustrate the consumer's ability to intelligently choose his or her response.

48. Plaintiff seeks to end these violations of the FDCPA. Plaintiff has suffered damages including but not limited to, fear, stress, mental anguish, emotional stress and acute embarrassment. Plaintiff and putative class members are entitled to preliminary and permanent injunctive relief, including, declaratory relief, and damages.

COUNT I

FAIR DEBT COLLECTION PRACTICES ACT 15 U.S.C. §1692 VIOLATIONS

49. Plaintiff repeats the allegations contained in paragraphs 1 through 48 as if the same were set forth at length.

50. Defendants violated 15 U.S.C. §1692 et seq. of the FDCPA in connection with their collection attempts against Plaintiff and others similarly situated.

51. By sending collection letters the same as or substantially similar to the February 18, 2016 letter, Defendants violated several provisions of the FDCPA, including, but not limited to:

- A. 15 U.S.C. §1692e, by using a false, deceptive or misleading representation or means in connection with the collection of any debt;
- B. 15 U.S.C. §1692e(2)(A), by falsely representing the character, amount, or legal status of any debt;
- C. 15 U.S.C. §1692e(2)(B), by falsely representing any services rendered or compensation which may lawfully be received by a debt collector for the collection of a debt;
- D. 15 U.S.C. § 1692e(3) of the FDCPA by falsely representing or implying that any individual is an attorney or that any communication is from an attorney.
- E. 15 U.S.C. § 1692e(5) of the FDCPA by threatening to take any action that cannot legally be taken.
- F. 15 U.S.C. §1692e(10) by using any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.
- G. 15 U.S.C. §1692f by using unfair or unconscionable means to collect or attempt to collect any debt,

- H. 15 U.S.C. §1692f(1), by collecting or attempting to collect any amount not expressly authorized by the agreement creating the debt or permitted by law; and,
- I. 15 U.S.C. §1692g and 15 U.S.C. §1692g(a)(1), by failing to accurately identify the amount of the debt allegedly owed.

WHEREFORE, Plaintiff, on behalf of himself and others similarly situated, demands judgment against Defendants as follows:

(a) Declaring that this action is properly maintainable as a Class Action and certifying Plaintiff as Class representative and attorney Lawrence Hersh, Esq., as Class Counsel;

(b) Awarding Plaintiff and the Class maximum statutory damages;

(c) Awarding Plaintiff and the Class actual damages

(d) Awarding pre-judgment interest;

(e) Awarding post-judgment interest;

(f) Awarding reasonable attorneys' fees, costs and expenses; and

(g) Awarding Plaintiff and the Class such other and further relief as the Court may deem just and proper.

Dated: Rutherford, New Jersey
February 20, 2017

Respectfully submitted,

By: s/ Lawrence C. Hersh
Lawrence C. Hersh, Esq.
17 Sylvan Street, Suite 102B
Rutherford, NJ 07070
(201) 507-6300
Attorney for Plaintiff

CERTIFICATION PURSUANT TO LOCAL RULE 11.2

I, Lawrence C. Hersh, the undersigned attorney of record for Plaintiff, do hereby certify to my own knowledge and based upon information available to me at my office, the matter in controversy is not the subject of any other action now pending in any court or in any arbitration or administrative proceeding.

Dated: February 20, 2017

By: s/ Lawrence C. Hersh
Lawrence C. Hersh, Esq

EXHIBIT A



ARMAND LAW GROUP, PLLC
 8668 Spring Mountain Road, Suite 110
 Las Vegas NV 89117
 Phone: (888) 292-2285

Armand Fried, Esq
 ADMITTED TO THE BARS OF:
 United States Supreme Court
 2nd Circuit Court of Appeals
 Supreme Court, State of New York
 Supreme Court, State of Nevada
 U.S. District Court, Southern Dist. of NY
 U.S. District Court, Eastern Dist. of NY
 U.S. District Court, Nevada

Hours of Operation: Monday – Friday | 9:00 a.m. – 5:00 p.m.

Aargon Account #: [REDACTED]
 Letter Dated: February 18, 2016

Creditor's Name: DJO GLOBAL
 Creditors Account Number: [REDACTED]

DELINQUENT ACCOUNT	
Amount Owed:	\$ 30.00
Interest Accrued:	\$ 0.65
Charges/Fees:	\$ 0.00
Your Payments:	- \$ 0.00
Total Balance Due:	\$ 30.65

Dear DYLAN BROWN,

Please be advised that ARMAND LAW GROUP PLLC, represents AARGON AGENCY INC, ("AARGON") in the area of creditor rights. AARGON has been assigned to collect the above referenced account, by the creditor listed above, and has requested that our office prepare this notice informing you of the following rights:

Unless you notify this office within thirty (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 thirty (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 thirty (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.

AARGON will attempt to collect this debt through traditional debt collection practices. If AARGON is unsuccessful in collecting this debt on their own, they may review the account and make a determination as to whether or not to pursue legal action to recover this debt. In the event the AARGON elects to pursue this debt through litigation, your account may be forwarded to our office for an independent review by one of our attorneys and if necessary forwarded to a law firm in your area from our network.

At this time no attorney has personally reviewed the particular circumstances of your account. In order to resolve this matter, you should contact AARGON directly, at (800) 280-1183 Ext. 333 and reference your AAI Account Number: [REDACTED]

If your original agreement with the above creditor contained default remedies, such as the addition of collection costs, interest, and/or attorney fees, those amounts may be included in the amount due.

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

Daniel Ryan,
 Armand Law Group, PLLC

See Reverse Side for Important Consumer Information
 DETACH BOTTOM PORTION AND RETURN WITH PAYMENT

346CDARAC01_DL4 - 63297108

Aargon Agency Inc.
 8668 Spring Mountain Road
 Las Vegas, NV 89117-4113



RETURN SERVICE REQUESTED

Account #: [REDACTED]

Total Balance Due: \$ 30.65

See reverse side for payment information.



DYLAN BROWN



AAI
 8668 SPRING MOUNTAIN RD
 LAS VEGAS, NV 89117-4113



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

DYLAN BROWN

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

(c) Attorneys (Firm Name, Address, Email and Telephone Number) Lawrence Hersh, Esq. 17 Sylvan Street, Suite 102b Rutherford, NJ 07070

DEFENDANTS

ARMAND LAW GROUP, PLLC and AARGON AGENCY, INC.

County of Residence of First Listed Defendant (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, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 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)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

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

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

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

- 1 Original Proceeding, 2 Removed from State Court, 3 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 USC 1692 et. seq. Brief description of cause: FDCPA

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 02/20/2017 SIGNATURE OF ATTORNEY OF RECORD /s/ Lawrence Hersh

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING 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.Cv.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; **NOTE: 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 clerk(s) 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 – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- 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 statutes unless 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 actual dollar amount 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.

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Armand Law Group, Aargon Agency Bit by Debt Collection Class Action](#)
