

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

**MALCOLM CAMPBELL**, individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

**DONISI JAX, INC. d/b/a NATIONWIDE  
HEALTH ADVISORS**

Defendant.

Civil Case No.:

**CLASS ACTION COMPLAINT AND  
JURY DEMAND**

**INTRODUCTION**

1. Plaintiff Malcolm Campbell (“Plaintiff”) brings this Class Action Complaint for statutory damages, injunctive relief, and any other available legal or equitable remedies, resulting from Defendant Donisi Jax, Inc.’s (d/b/a Nationwide Health Advisors) (“Nationwide”) practice of placing prerecorded and autodialed telemarketing telephone calls to telephones without prior express written consent in violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.*, (“TCPA”).

**JURISDICTION AND VENUE**

2. This Court has subject matter jurisdiction under 28 U.S.C. § 1331, as this action arises under the TCPA, which is a federal statute. This Court has personal jurisdiction over Defendant because Defendant resides in this District and the behavior giving rise to the instant litigation occurred in this District.

3. Venue is proper in this District under 28 U.S.C. § 1391(b) because Defendant resides in this District.

**PARTIES**

4. Plaintiff is, and at all times mentioned herein was, a citizen and resident of Los Angeles, California.

5. Plaintiff is, and at all times mentioned herein was, a “person” as defined by 47 U.S.C. § 153 (39).

6. Defendant Donisi Jax, Inc. d/b/a Nationwide Health Advisors is and at all times mentioned herein was, a corporation duly organized under the laws of the State of Florida with its headquarters in Pompano Beach, Florida.

7. Defendant is and at all times mentioned herein was, a “person” as defined by 47 U.S.C. § 153(39).

#### **FACTUAL ALLEGATIONS**

8. In 2017, Defendant began placing telephone calls to Plaintiff’s cellular telephone number ending in 0279.

9. These calls came from Defendant’s telephone numbers, including 323-289-6166, 323-289-6167, and 323-289-6172.

10. Upon information and belief, Defendant has called Plaintiff dozens of times.

11. All of the calls were intended to, and did, advertise health insurance plans.

12. Several of these calls used a prerecorded voice.

13. For example, one of the calls used the prerecorded voice of a terrible Morgan Freeman impersonator, which advertised health plans and invited Plaintiff to call back at 855-341-3959, which is one of Defendant’s telephone numbers.

14. These calls also used an automatic telephone dialing system, as evidenced by a brief and unnatural pause prior to the prerecorded messages beginning to play (e.g. in the Morgan Freeman example, no message began for four seconds).

15. Because the calls constitute telemarketing, Defendant was required to obtain prior express written consent from the persons to whom they made calls.

16. “Prior express written consent” is specifically defined by statute as:

[A]n agreement, in writing, bearing the signature of the person called that clearly authorizes the seller to deliver or cause to be delivered to the person called advertisements or telemarketing messages using an automatic telephone dialing system or an artificial or prerecorded voice, and the telephone number to which the signatory authorizes such advertisements or telemarketing messages to be delivered.

47 CFR § 64.1200(f)(8).

17. Specifically, this requires any written agreement to have a “clear and conspicuous” disclosure informing the person signing that “such person authorizes the seller to deliver or cause to be delivered to the signatory telemarketing calls using an automatic telephone dialing system or an artificial or prerecorded voice[.]” 47 CFR § 64.1200(f)(8)(i)(A).

18. “Clear and conspicuous”, in turn, is defined as “notice that would be apparent to a reasonable consumer, separate and distinguishable from the advertising copy or other disclosures.” 47 CFR § 64.1200(f)(3).

19. Plaintiff allegedly provided his telephone number through healthcare.com.

20. The disclosure on the page on which Plaintiff allegedly provided his telephone number is not sufficient to allow for “prior express written consent” as defined above.

21. As seen in the screenshot below, the required disclosures, to the extent they are adequate, are in small gray font on a gray page, below the “SEE PLAN QUOTES” button that purportedly binds the user to the terms.

**46 Health Plans Available in Manasquan, NJ. Compare Your Top Options.**

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Step 2 / 2 | Almost Done! | **95% Done**

**Subsidy & Eligibility**

Household: Est. Household Income: <sup>?</sup> Qualifying Event: <sup>?</sup>

1 \$13,000 - \$35,000 - Select -

It's OK to estimate

**Contact Information**

Full Name:


First Name / Last Name

Street Address: Email: Phone:

Enter a street address Email Phone

Manasquan, NJ 08736 [Edit](#) A copy of your quote will be sent here. Never junk mail. Mobile Phone?:  Yes  No

[BACK](#) [SEE PLAN QUOTES >](#)

 By clicking on the submit button, by completing a contact form on this site or calling a number posted on this site, you represent that you are at least 18 years old and agree to our [Privacy Policy](#) and [Terms of Use](#). You provide your signature expressly consenting to be contacted by HealthCare, Inc. and/or its partner companies and any of their commercial partners concerning the purchase of policies for health and other types of insurance including personal property and casualty insurance, even if you are on a state or federal Do Not Call Registry. You may be directed to a licensed sales agent who can answer your questions and provide information about Medicare related insurance plans. Agents are not connected with or endorsed by the U.S. government or the federal Medicare program. You agree to be contacted through the use of emails or on your landline or mobile phone by live operators, automated telephone dialing systems, pre-recorded messages, and/or text messages or email. Your phone carrier's message and data rates may apply. Your consent is not a condition of purchase and you may revoke your consent at any time. You may also call to inquire and/or purchase. The plan prices and details shown here are just our initial estimates. To buy a plan, you must complete an application process with one of our partners that is licensed to sell insurance products and that will provide you more definitive information on plan prices, benefits, availability, and other details.

22. The placement and design of this disclosure is not “apparent to a reasonable consumer.” It is in small gray font against a slightly lighter gray background, below the button that needs to be clicked to see quotes.

23. Furthermore, while the page notes directly under the email field that “a copy of your quote will be sent here”, there is no similar disclaimer immediately under the “phone” field (which is required). This is deceptive in that it gives the false sense that calls would not be made, but quotes would instead be emailed.

24. Not only is the design and placement of the disclosure deficient, the disclosure itself

is also deficient for several reasons.

25. In full, the disclosure states:

By clicking on the submit button, by completing a contact form on this site or calling a number posted on this site, you represent that you are at least 18 years old and agree to our [Privacy Policy](#) and [Terms of Use](#). You provide your signature expressly consenting to be contacted by HealthCare, Inc. and/or its [partner companies](#) and any of their commercial partners concerning the purchase of policies for health and other types of insurance including personal property and casualty insurance, even if you are on a state or federal Do Not Call Registry. You may be directed to a licensed sales agent who can answer your questions and provide information about Medicare related insurance plans. Agents are not connected with or endorsed by the U.S. government or the federal medicare program. You agree to be contacted through the use of emails or on your landline or mobile phone by live operators, automated telephone dialing systems, pre-recorded messages, and/or text messages or email. Your phone carrier's message and data rates may apply. Your consent is not a condition of purchase and you may revoke your consent at any time. You may also call to inquire and/or purchase. The plan prices and details shown here are just our initial estimates. To buy a plan, you must complete an application process with one of our partners that is licensed to sell insurance products and that will provide you more definitive information on plan prices, benefits, availability, and other details.

26. The disclosures regarding autodialed or prerecorded messages is included midway through a paragraph containing several other disclosures, including disclosures regarding the application process, licensure, pricing, and relationships (or lack thereof) with the government and various agencies.

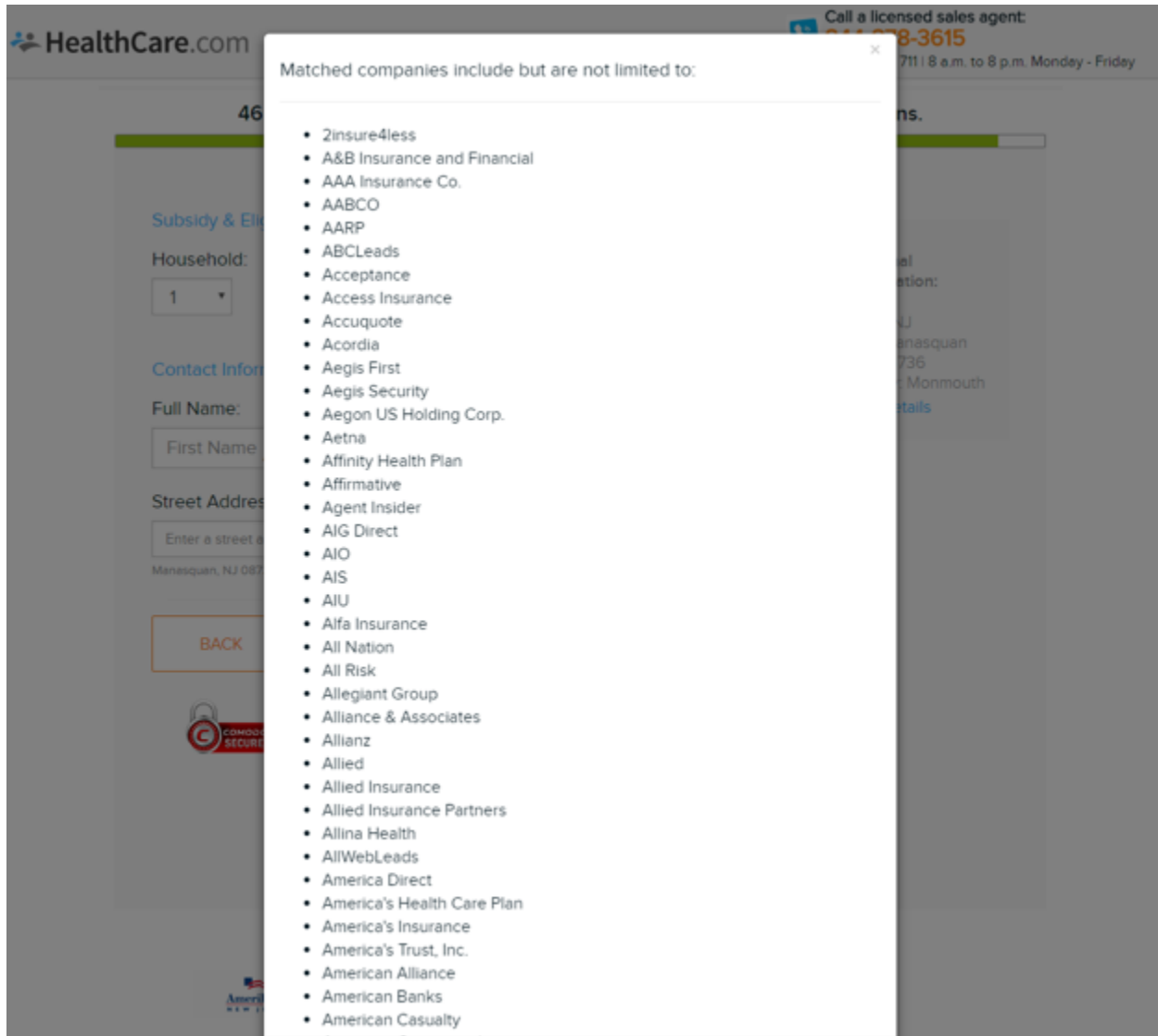
27. This violates the requirement that the disclosure regarding prerecorded telemarketing calls must be "separate and distinguishable" from other disclosures.

28. Perhaps most egregiously, this disclosure does not directly explain to which companies the user is purportedly giving consent.

29. Only by clicking the "partner companies" hyperlink is one provided a list of companies.

30. Clicking the "partner companies" hyperlink causes a window to pop out displaying

a list of 814 Companies that, along with their “commercial partners”, ostensibly now have consent to call the person who filled out the form. The first part of this pop out can be seen in the following screenshot:



31. Nationwide Health Advisors appears more than halfway down the list (company number 527).

32. Beyond being absurd on its face to allow one form to give consent for phone calls from *at least* 814 different companies buried in a hyperlink, this violates the requirement that any

prior express written consent agreement clearly and conspicuously authorizes “the seller” to deliver prerecorded telemarketing calls.

33. Necessarily, this includes clearly and conspicuously identifying the seller – not providing a pop up link to a list of more than 800 companies who can now call

34. Accordingly, the healthcare.com page is insufficient to allow for “prior express written consent” and neither Plaintiff nor anyone else who allegedly provided their information to Defendant through this page provided the required “prior express written consent.”

35. Indeed, Plaintiff did not want these calls, and sought to stop these calls by requesting that Defendant stop calling. These calls caused Plaintiff to spend time answering, time attempting to opt out, and caused Plaintiff immense frustration and annoyance. The calls were an invasion of Plaintiff’s privacy.

36. Upon information and belief, Defendant does not maintain adequate records to track revocation of consent.

37. Regardless, because Defendant failed to obtain prior express written consent prior to making its prerecorded and autodialed telemarketing calls, Defendant’s telephone calls violate 47 U.S.C. § 227(b), and Plaintiff and putative class members are entitled to \$500 to \$1500 per call.

### **CLASS ACTION ALLEGATIONS**

38. Plaintiff brings this action under Fed. R. Civ. P. 23 on behalf of a proposed class defined as:

Plaintiff and all persons within the United States to whose telephone number Defendant placed a prerecorded or artificial voice telemarketing call, or to whose cellular telephone number Defendant placed a call using an automatic telephone dialing system, when Defendant obtained that telephone number through HealthCare.com.

(“Class”)

39. Excluded from this class are Defendant and any entities in which Defendant has a controlling interest; Defendant's agents and employees; any Judge and Magistrate Judge to whom this action is assigned and any member of their staffs and immediate families, and any claims for personal injury, wrongful death, and/or emotional distress.

40. The Class members for whose benefit this action is brought are so numerous that joinder of all members is impracticable.

41. The exact number and identities of the persons who fit within the class are ascertainable in that Defendant maintains written and electronically stored data showing:

- a. The time period(s) during which Defendant placed its calls;
- b. The telephone numbers to which Defendant placed its calls;
- c. The content of the calls;
- d. The equipment and methods for making the calls;
- e. The source of the telephone numbers to which Defendant placed its calls.

42. The Class is comprised of hundreds, if not thousands, of individuals nationwide.

43. There are common questions of law and fact affecting the rights of the Class members, including, *inter alia*, the following:

- a. Whether Defendant used an automatic dialing system or prerecorded voice in placing its calls;
- b. Whether the disclosure at healthcare.com qualifies as prior express written consent;
- c. Whether Plaintiff and Class members were damaged thereby, and the extent of damages for such violations; and
- d. Whether Defendant should be enjoined from engaging in such conduct in



the future.

44. Plaintiff is a member of the Class in that Defendant made prerecorded telemarketing calls using an automatic telephone dialing system to his cellular telephone.

45. The claims of Plaintiff are typical of the Class members in that they arise from Defendant's uniform conduct and are based on the same legal theories of all Class members.

46. Plaintiff and all putative Class members have also necessarily suffered actual damages in addition to statutory damages, as the calls used Class members' cellular telephone plans, caused a nuisance to Class members, caused Class members to waste time answering the calls, and invaded Class members' privacy.

47. Plaintiff has no interests antagonistic to, or in conflict with, the Class.

48. Plaintiff will thoroughly and adequately protect the interests of the Class, having retained qualified and competent legal counsel to represent himself and the Class.

49. Defendant has acted and refused to act on grounds generally applicable to the Class, thereby making injunctive and declaratory relief appropriate for the Class as a whole.

50. The prosecution of separate actions by individual class members would create a risk of inconsistent or varying adjudications.

51. A class action is superior to other available methods for the fair and efficient adjudication of the controversy since, *inter alia*, the damages suffered by each class member make individual actions uneconomical.

52. Common questions will predominate, and there will be no unusual manageability issues.

**FIRST CAUSE OF ACTION**  
**Violation of 47 U.S.C. § 227**  
(On Behalf of Plaintiff and the Class)

53. Plaintiff incorporates the foregoing allegations as if fully set forth herein.

54. Defendant placed prerecorded and autodialed telemarketing telephone calls to the telephone numbers belonging to Plaintiff and the other members of the Class.

55. These calls were made in the absence of prior express written consent from Plaintiff and Class members.

56. Defendant has therefore violated 47 U.S.C. § 227(b).

57. As a result of Defendant's unlawful conduct, Plaintiff and the members of the putative Class are each entitled to, *inter alia*, a minimum of \$500 in damages for each such violation under 47 U.S.C. § 227(b)(3)(B).

58. Should the Court determine that Defendant's conduct was willful and/or knowing, Plaintiff and each member of the Class are entitled to treble damages in the amount of \$1,500 per call, pursuant to 47 U.S.C. § 227(b)(3).

#### **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff Malcolm Campbell, individually and on behalf of the Class, prays for the following relief:

A. An order certifying the Class as defined above, appointing Plaintiff Campbell as the representative of the Class, and appointing his counsel as Class Counsel;

B. An order declaring that Defendant's actions, as set out above, violate 47 U.S.C. § 227;

C. An award of injunctive and other equitable relief as necessary to protect the interests of the Class, including, *inter alia*, an order prohibiting Defendant from engaging in the wrongful and unlawful acts described herein;

D. An award of statutory damages;

E. Such other and further relief that the Court deems reasonable and just.

**JURY DEMAND**

Plaintiff requests a trial by jury of all claims that can be so tried.

**Dated:** January 9, 2018

*/s/ Bradford R. Sohn*

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Bradford R. Sohn  
Fla. Bar No. 98788  
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*/s/ Jeremy M. Glapion*

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[jmg@glapionlaw.com](mailto:jmg@glapionlaw.com)  
*Pro hac vice (to be filed)*

*Attorneys for Plaintiff*

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

I. (a) PLAINTIFFS Malcolm Campbell DEFENDANTS Donisi Jax, Inc. d/b/a Nationwide Health Advisors

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

(c) Attorneys (Firm Name, Address, and Telephone Number) Jeremy M. Glapion, Glapion Law Firm, 1704 Maxwell Drive, Wall NJ 07719; 7324559737

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

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

Form with checkboxes for Basis of Jurisdiction (U.S. Government Plaintiff/Defendant, Federal Question, Diversity) and Citizenship of Principal Parties (Citizen of This State, Another State, Foreign Country).

IV. NATURE OF SUIT (Place an "X" in One Box Only) Click here for: Nature of Suit Code Descriptions

Large grid of checkboxes for Nature of Suit categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, PERSONAL INJURY, TORTS, LABOR, IMMIGRATION, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only) 1 Original Proceeding 2 Removed from State Court 3 Re-filed (See VI below) 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation Transfer 7 Appeal to District Judge from Magistrate Judgment 8 Multidistrict Litigation - Direct File 9 Remanded from Appellate Court

VI. RELATED/ RE-FILED CASE(S) (See instructions): a) Re-filed Case YES NO b) Related Cases YES NO JUDGE: DOCKET NUMBER:

VII. CAUSE OF ACTION 47 USC 227 (calls without prior express written consent) LENGTH OF TRIAL via 5 days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$5,000,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE DATE January 3, 2018 SIGNATURE OF ATTORNEY OF RECORD

**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**

## Authority For Civil Cover Sheet

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

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

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

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

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

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

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

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked. Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

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

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

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

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

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

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

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

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

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

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

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

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

**VII. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553

Brief Description: Unauthorized reception of cable service

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

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

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

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

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

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

Malcolm Campbell

Plaintiff(s)

v.

Donisi Jax, Inc. d/b/a Nationwide Health Advisors

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Monica Reed
c/o Donisi Jax, Inc.
Box 4030
Fort Lauderdale, Florida 33338

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: Jeremy M. Glapion, Glapion Law Firm, 1704 Maxwell Drive, Wall, NJ 07719

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

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

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_ .

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_ , who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the summons unexecuted because \_\_\_\_\_ ; or

Other *(specify)*:

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00 \_\_\_\_\_ .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

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

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

**Print**

**Save As...**

**Reset**

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Nationwide Health Advisors Pegged with TCPA Suit](#)

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