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Attorneys for Plaintiffs
Our File No.: 115242

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Rosemary Cruz and Robert R. Rankel, individually and
on behalf of all others similarly situated,

Plaintiffs,

vs.

Collecto, Inc. d/b/a EOS CCA,

Defendant.

Docket No:

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

Rosemary Cruz and Robert R. Rankel, individually and on behalf of all others similarly situated (hereinafter referred to collectively as “*Plaintiffs*”), by and through the undersigned counsel, complain, state and allege against Collecto, Inc. d/b/a EOS CCA (hereinafter referred to as “*Defendant*”), as follows:

INTRODUCTION

1. This action seeks to recover for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (“FDCPA”).

JURISDICTION AND VENUE

2. This Court has federal subject matter jurisdiction pursuant to 28 U.S.C. §1331 and 15 U.S.C. § 1692k(d).

3. Venue is proper under 28 U.S.C. §1391(b) because a substantial part of the events or omissions giving rise to the claim occurred in this Judicial District.

4. At all relevant times, Defendant conducted business within the State of New York.

PARTIES

5. Plaintiff Rosemary Cruz is an individual who is a citizen of the State of New York residing in Nassau County, New York.

6. Plaintiff Robert R. Rankel is an individual who is a citizen of the State of New York residing in Westchester County, New York.

7. Plaintiffs are “consumers” as defined by 15 U.S.C. § 1692a(3).

8. On information and belief, Defendant Collecto, Inc. d/b/a EOS CCA, is a Massachusetts Corporation with a principal place of business in Plymouth County, Massachusetts.

9. Defendant is regularly engaged, for profit, in the collection of debts allegedly owed by consumers.

10. Defendant is a “debt collector” as defined by 15 U.S.C. § 1692a(6).

ALLEGATIONS

11. Defendant alleges each of the Plaintiffs owe a debt (“the Debts”).

12. The Debts were primarily for personal, family or household purposes and are therefore “debts” as defined by 15 U.S.C. § 1692a(5).

13. At an exact time known only to Defendant, the Debts were assigned or otherwise transferred to Defendant for collection.

14. In its efforts to collect the debt alleged owed by Plaintiff Cruz, Defendant contacted Plaintiff Cruz by letter dated February 19, 2018. (“**Exhibit 1.**”)

15. In its efforts to collect the debt alleged owed by Plaintiff Rankel, Defendant contacted Plaintiff Rankel by letter dated April 17, 2018. (“**Exhibit 2.**”)

16. The Letters are identical in all material respects.

17. The Letters are “communications” as defined by 15 U.S.C. § 1692a(2).

18. 15 U.S.C. § 1692e prohibits a debt collector from using any false, deceptive, or misleading representation or means in connection with the collection of any debt.

19. While § 1692e specifically prohibits certain practices, the list is non-exhaustive, and does not preclude a claim of falsity or deception based on any non-enumerated practice.

20. The question of whether a collection letter is deceptive is determined from the perspective of the “least sophisticated consumer.”

21. A collection letter is deceptive under 15 U.S.C. § 1692e if it can reasonably be read by the least sophisticated consumer to have two or more meanings, one of which is inaccurate.

22. A collection letter is also deceptive under 15 U.S.C. § 1692e if it is reasonably susceptible to an inaccurate reading by the least sophisticated consumer.

23. For purposes of 15 U.S.C. § 1692e, the failure to clearly and accurately identify the creditor to whom the debt is owed is unfair and deceptive to the least sophisticated consumer.

24. The identity of creditor to whom the debt is owed is a material piece of information to a consumer.

25. Knowing the identity of creditor to whom the debt.

26. A debt collector has the obligation not just to convey the name of the creditor to whom the debt is owed, but also to convey such clearly.

27. A debt collector has the obligation not just to convey the name of the creditor to whom the debt is owed, but also to state such explicitly.

28. Even if a debt collector conveys the required information, the debt collector nonetheless violates the FDCPA if it conveys that information in a confusing or contradictory fashion so as to cloud the required message with uncertainty.

29. When determining whether the name of the creditor to whom the debt is owed has been conveyed clearly, an objective standard, measured by how the “least sophisticated consumer” would interpret the notice, is applied.

30. The Letters fail to identify by name and label any entity as “creditor,” “original creditor,” “current creditor,” “account owner,” or “creditor to whom the debt is owed.”

31. The Letters state, “Client Name: Verizon.”

32. The Letters fail to identify any entity as the “creditor to whom the debt is owed.”

33. “Verizon,” even if meant as the creditor to whom the debt is owed (which is not stated in the letter), is not specific enough to apprise Plaintiff of the identity of the creditor to whom the debt is owed.

34. There is no entity named “Verizon” registered with the New York State Department of State, Division of Corporations.

35. Conversely, there are ninety-one (91) disparate entities registered in New York that begin their legal name with “Verizon.”

36. The least sophisticated consumer would likely be confused as to which of the ninety-one (91) disparate entities registered in New York that begin their legal name with “Verizon” is the creditor to whom the debt is owed.

37. The least sophisticated consumer would likely be uncertain as to which of the ninety-one (91) disparate entities registered in New York that begin their legal name with “Verizon” is the creditor to whom the debt is owed.

38. Defendant failed to explicitly state the name of the creditor to whom the debt is owed.

39. Defendant failed to clearly state the name of the creditor to whom the debt is owed.

40. The least sophisticated consumer would likely be confused as to the name of the creditor to whom the debt is owed.

41. The least sophisticated consumer would likely be uncertain as to the name of the creditor to whom the debt is owed.

42. Because the Letters can reasonably be read by the least sophisticated consumer to have two or more meanings, one of which is inaccurate, as described, they are deceptive within the meaning of 15 U.S.C. § 1692e.

43. Because the Letter can reasonably susceptible to an inaccurate reading by the least sophisticated consumer, as described, they are deceptive within the meaning of 15 U.S.C. § 1692e.

44. The least sophisticated consumer would likely be deceived by the Letters.

45. The least sophisticated consumer would likely be deceived in a material way by the Letters.

46. Defendant violated § 1692e by using a false, deceptive and misleading representation in its attempt to collect a debt.

CLASS ALLEGATIONS

47. Plaintiffs bring this action individually and as a class action on behalf of all persons similarly situated in the State of New York from whom Defendant attempted to collect a

consumer debt using a collection letter that references “Client Name: Verizon,” from one year before the date of this Complaint to the present.

48. This action seeks a finding that Defendant’s conduct violates the FDCPA, and asks that the Court award damages as authorized by 15 U.S.C. § 1692k.

49. Defendant regularly engages in debt collection.

50. The Class consists of more than 35 persons from whom Defendant attempted to collect delinquent consumer debts using a collection letter that references “Client Name: Verizon.”

51. Plaintiffs’ claims are typical of the claims of the Class. Common questions of law or fact raised by this class action complaint affect all members of the Class and predominate over any individual issues. Common relief is therefore sought on behalf of all members of the Class. This class action is superior to other available methods for the fair and efficient adjudication of this controversy.

52. The prosecution of separate actions by individual members of the Class would create a risk of inconsistent or varying adjudications with respect to the individual members of the Class, and a risk that any adjudications with respect to individual members of the Class would, as a practical matter, either be dispositive of the interests of other members of the Class not party to the adjudication, or substantially impair or impede their ability to protect their interests. Defendant has acted in a manner applicable to the Class as a whole such that declaratory relief is warranted.

53. Plaintiffs will fairly and adequately protect and represent the interests of the Class. The management of the class action proposed is not extraordinarily difficult, and the factual and legal issues raised by this class action complaint will not require extended contact with the members of the Class, because Defendant’s conduct was perpetrated on all members of the Class and will be established by common proof. Moreover, Plaintiffs have retained counsel experienced in actions brought under consumer protection laws.

JURY DEMAND

54. Plaintiffs hereby demand a trial of this action by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request judgment as follows:

- a. Certify this action as a class action; and
- b. Appoint Plaintiffs as Class Representatives of the Class, and Plaintiffs' attorneys as Class Counsel; and
- c. Find that Defendant's actions violate the FDCPA; and
- d. Grant damages against Defendant pursuant to 15 U.S.C. § 1692k; and
- e. Grant Plaintiffs' attorneys' fees pursuant to 15 U.S.C. § 1692k; and
- f. Grant Plaintiffs' costs; together with
- g. Such other relief that the Court determines is just and proper.

DATED: February 14, 2019

BARSHAY SANDERS, PLLC

By: /s/ Craig B. Sanders
Craig B. Sanders, Esq.
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Garden City, New York 11530
Tel: (516) 203-7600
Fax: (516) 706-5055
csanders@barshaysanders.com
Attorneys for Plaintiffs
Our File No.: 115242





EOS CCA
PO BOX 981002
BOSTON, MA 02298-1002

ACCOUNT INFORMATION	
STATEMENT DATE	02/19/18
ACCOUNT #	██████████4693
CLIENT NAME	VERIZON
TOTAL AMOUNT DUE >	\$1,350.32
SETTLEMENT AMOUNT DUE >	\$540.13

Please see reverse side for details of Total Due.

NOTICE OF COLLECTION PLACEMENT

*** SETTLEMENT OFFER ***

VERIZON has authorized us to accept \$540.13 to resolve this debt in full if the payment is received by 04/05/18.

To take advantage of this offer, you may pay online, through the mail, or by phone.

We are not obligated to renew this offer.


New York City Dept of Consumer Affairs License #0960830. You may contact our office at the toll free number below during the hours noted and speak to David Weydt or any available representative.


Check must be made payable to Verizon.


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.

****Please see reverse for important notices and account details.****

PAYMENT OPTIONS

 Pay online at www.eos-cca.com. Log in with the following account number: ██████████4693

 Pay by phone at 1-855-666-9210.

 Pay by mail. Include the remittance slip below and send to the address shown on the slip.

Office Hours: Mon-Thur 8:00 AM - 9:00 PM CT, Fri 8:00 AM - 5:00 PM CT, Sat 8:00 AM - 12:00 PM CT

Detach remittance slip and enclose with payment

PO BOX 981002
BOSTON, MA 02298-1002

CLIENT NAME	ACCOUNT #
VERIZON	8-14214693
TOTAL AMOUNT DUE >	\$1,350.32



Pay by phone at 1-855-666-9210.



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Pay by mail. Include the remittance slip below and send to the address shown on the slip.

Office Hours: Mon-Thur 8:00 AM - 9:00 PM CT, Fri 8:00 AM - 5:00 PM CT, Sat 8:00 AM - 12:00 PM CT


Detach remittance slip and enclose with payment

PO BOX 981002
BOSTON, MA 02298-1002



1 of 1

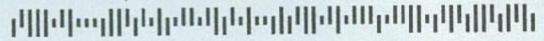
PO1000


ROSEMARY CRUZ
93 WOODSIDE AVE
FREEPORT NY 11520-1236



CLIENT NAME	ACCOUNT #
VERIZON	██████████ 4693
TOTAL AMOUNT DUE	\$1,350.32
SETTLEMENT AMOUNT DUE	\$540.13
IF PAYING BY VISA OR MASTERCARD, FILL OUT BELOW	
<input type="checkbox"/> VISA	<input type="checkbox"/> MASTERCARD
CARD NUMBER	AMOUNT
SIGNATURE	Exp. Date

EOS CCA
PO BOX 981025
BOSTON, MA 02298-1025





EOS CCA
PO BOX 981002
BOSTON, MA 02298-1002

ACCOUNT INFORMATION	
STATEMENT DATE	04/17/18
ACCOUNT #	3383
CLIENT NAME	VERIZON

TOTAL AMOUNT DUE >	\$335.85
SETTLEMENT AMOUNT DUE >	\$235.10

Please see reverse side for details of Total Due.

NOTICE OF COLLECTION PLACEMENT

*** SETTLEMENT OFFER ***

VERIZON has authorized us to accept \$235.10 to resolve this debt in full if the payment is received by 06/01/18.

To take advantage of this offer, you may pay online, through the mail, or by phone.

We are not obligated to renew this offer.

New York City Dept of Consumer Affairs License #0960830. You may contact our office at the toll free number below during the hours noted and speak to David Weydt or any available representative.

Check must be made payable to Verizon.

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.

****Please see reverse for important notices and account details.****

PAYMENT OPTIONS

Pay online at www.eos-cca.com. Log in with the following account number: 8-14243383

Pay by phone at 1-800-368-4871.

Pay by mail. Include the remittance slip below and send to the address shown on the slip.

Office Hours: Mon-Thur 8:00 AM - 9:00 PM ET, Fri 8:00 AM - 5:00 PM ET, Sat 8:00 AM - 12:00 PM ET

Detach remittance slip and enclose with payment

PO BOX 981002
BOSTON, MA 02298-1002

VERIZON		8-14243383
TOTAL AMOUNT DUE		\$335.85
SETTLEMENT AMOUNT DUE		\$235.10
IF PAYING BY VISA OR MASTERCARD, FILL OUT BELOW		
<input type="checkbox"/> VISA	<input type="checkbox"/> MASTERCARD	
CARD NUMBER	AMOUNT	
SIGNATURE	Exp. Date	



ROBERT RANKEL
20 SUN HILL RD FL 1
KATONAH NY 10536-3301

EOS CCA
PO BOX 981025
BOSTON, MA 02298-1025



FEDERAL LAW

Unless you dispute the validity of this debt, or any portion thereof, within thirty days after receipt of this notice, we shall assume the debt to be valid. If you notify us in writing of your dispute within this thirty-day period, we will obtain verification of the debt, or a copy of a judgment against you, and a copy of such verification or judgment will be mailed to you. Upon your written request within the thirty-day period, we will provide you with the name and address of the original creditor, if different from the current creditor.

Debt collectors, in accordance with the Fair Debt Collection Practices Act, 15 U.S.C. 1692 et seq., are prohibited from engaging in abusive, deceptive, and unfair debt collection efforts, including but not limited to: a) the use or threat of violence; b) the use of obscene or profane language; and c) repeated phone calls made with the intent to annoy, abuse, or harass. If a creditor or debt collector receives a money judgment against you in court, state and federal laws may prevent the following types of income from being taken to pay the debt: 1. Supplemental security income, (SSI); 2. Social security; 3. Public assistance (welfare); 4. Spousal support, maintenance (alimony) or child support; 5. Unemployment benefits; 6. Disability benefits; 7. Workers compensation benefits; 8. Public or private pensions; 9. Veterans benefits; 10. Federal student loans, federal student grants, and federal work study funds; and 11. Ninety percent of your wages or salary earned in the last sixty days.

AMOUNT DUE AT CHARGE OFF	INTEREST ACCRUED SINCE CHARGE OFF	NON INTEREST CHARGES OR FEES SINCE CHARGE OFF	TOTAL PAYMENTS SINCE CHARGE OFF
\$335.85	\$0.00	\$0.00	\$0.00

EOS CCA ACCOUNT #	CLIENT ACCOUNT #	PRINCIPAL	INTEREST	FEE	COLL. COSTS	BALANCE
3383	0001	\$335.85	\$0.00	\$0.00	\$0.00	\$335.85
TOTAL DUE:						\$335.85

For payments and general account inquiries, call 1-800-368-4871 or 1-781-681-4300.
 For customer service issues, call our Consumer Relations Department at 1-877-395-5997.

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

ROSEMARY CRUZ

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

(c) Attorneys (Firm Name, Address, and Telephone Number) BARSHAY SANDERS, PLLC 100 Garden City Plaza, Ste 500, Garden City, NY 11530 (516) 203-7600

DEFENDANTS

COLLECTO, INC. D/B/A EOS CCA

County of Residence of First Listed Defendant PLYMOUTH (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)

- 0 1 U.S. Government Plaintiff
0 2 U.S. Government Defendant
0 3 Federal Question (U.S. Government Not a Party)
0 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)

- Citizen of This State PTF DEF 0 1 0 1
Citizen of Another State 0 2 0 2
Citizen or Subject of a Foreign Country 0 3 0 3
Incorporated or Principal Place of Business In This State PTF DEF 0 4 0 4
Incorporated and Principal Place of Business In Another State 0 5 0 5
Foreign Nation 0 6 0 6

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

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Insurance, Personal Injury, Labor, etc.

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

- 0 1 Original Proceeding
0 2 Removed from State Court
0 3 Remanded from Appellate Court
0 4 Reinstated or Reopened
0 5 Transferred from Another District (specify)
0 6 Multidistrict Litigation - Transfer
0 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
Brief description of cause: 15 USC §1692 Fair Debt Collection Practices Act Violation

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

JUDGE DOCKET NUMBER

DATE SIGNATURE OF ATTORNEY OF RECORD

February 14, 2019 /s Craig Sanders

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

CERTIFICATION OF ARBITRATION ELIGIBILITY

Local Arbitration Rule 83.10 provides that with certain exceptions, actions seeking money damages only in an amount not in excess of \$150,000, exclusive of interest and costs, are eligible for compulsory arbitration. The amount of damages is presumed to be below the threshold amount unless a certification to the contrary is filed.

Case is Eligible for Arbitration

I, _____, counsel for _____, do hereby certify that the above captioned civil action is ineligible for compulsory arbitration for the following reason(s):

- monetary damages sought are in excess of \$150,000, exclusive of interest and costs,
- the complaint seeks injunctive relief,
- the matter is otherwise ineligible for the following reason

DISCLOSURE STATEMENT - FEDERAL RULES CIVIL PROCEDURE 7.1

Identify any parent corporation and any publicly held corporation that owns 10% or more of its stocks:

RELATED CASE STATEMENT (Section VIII on the Front of this Form)

Please list all cases that are arguably related pursuant to Division of Business Rule 50.3.1 in Section VIII on the front of this form. Rule 50.3.1 (a) provides that "A civil case is "related" to another civil case for purposes of this guideline when, because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a substantial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge." Rule 50.3.1 (b) provides that " A civil case shall not be deemed "related" to another civil case merely because the civil case: (A) involves identical legal issues, or (B) involves the same parties." Rule 50.3.1 (c) further provides that "Presumptively, and subject to the power of a judge to determine otherwise pursuant to paragraph (d), civil cases shall not be deemed to be "related" unless both cases are still pending before the court."

NY-E DIVISION OF BUSINESS RULE 50.1(d)(2)

- 1.) Is the civil action being filed in the Eastern District removed from a New York State Court located in Nassau or Suffolk County? Yes No
- 2.) If you answered "no" above:
 - a) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in Nassau or Suffolk County? Yes No
 - b) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in the Eastern District? Yes No
 - c) If this is a Fair Debt Collection Practice Act case, specific the County in which the offending communication was received: NASSAU

If your answer to question 2 (b) is "No," does the defendant (or a majority of the defendants, if there is more than one) reside in Nassau or Suffolk County, or, in an interpleader action, does the claimant (or a majority of the claimants, if there is more than one) reside in Nassau or Suffolk County? Yes No

(Note: A corporation shall be considered a resident of the County in which it has the most significant contacts).

BAR ADMISSION

I am currently admitted in the Eastern District of New York and currently a member in good standing of the bar of this court. Yes No

Are you currently the subject of any disciplinary action (s) in this or any other state or federal court? Yes (If yes, please explain) No

I certify the accuracy of all information provided above.

Signature: /s Craig B. Sanders

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

UNITED STATES DISTRICT COURT
for the
EASTERN DISTRICT OF NEW YORK

Rosemary Cruz and Robert R. Rankel, individually)
and on behalf of all others similarly situated,)
Plaintiff(s))

v.)

Civil Action No.)

Collecto, Inc. d/b/a EOS CCA,)
Defendant(s))

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*
Collecto, Inc. d/b/a EOS CCA
105 Maxess Road
Suite 303
Melville, NY 11747

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:

BARSHAY SANDERS PLLC
100 GARDEN CITY PLAZA, SUITE 500
GARDEN CITY, NY 11530

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. 06/12) Summons in a Civil Action (Page 2)

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:

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [EOS CCA Failed to Properly Identify Creditor in Letters, Lawsuit Claims](#)
