

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

CASE NO.

BRENDA J. HOWE, *on behalf of herself
and all others similarly situated,*

Plaintiff,

v.

RECEIVABLES PERFORMANCE MANAGEMENT, LLC,
a Washington State Limited Liability Company,

Defendant.

CLASS ACTION COMPLAINT AND JURY DEMAND

1. On behalf of herself and the putative class, Plaintiff alleges violations of the *Fair Debt Collection Practices Act*, 15 U.S.C. §1692 *et seq.* (“FDCPA”).

JURISDICTION AND VENUE

2. This Court has jurisdiction under the *Fair Debt Collection Practices Act*, pursuant to 28 U.S.C. §1331 and 15 U.S.C. §1692k.

3. Venue in this District is proper because Plaintiff resides here and Defendant conducts business in this District.

PARTIES

4. Plaintiff, Brenda J. Howe (“Plaintiff”), is a natural person, and a resident of the State of Florida, residing in Indian River County, Florida.

5. Defendant, Receivables Performance Management, LLC (“Defendant”), is a Washington State Limited Liability Company engaged in the business of collecting consumer

debts, which operates from offices located at 20816 44th Avenue West, Lynnwood, Washington, 98036. Defendant is licensed in Florida as a consumer collection agency, license number CCA0900675.

6. Defendant regularly uses the United States Postal Service and telephone in the collection of consumer debts.

7. Defendant regularly collects or attempts to collect consumer debts for other parties. Defendant is a “debt collector” as defined in the *FDCPA*.

8. At all times material to the allegations of this Complaint, Defendant was acting as a debt collector with respect to the collection of Plaintiff’s alleged debt.

FACTUAL ALLEGATIONS

9. Defendant sought to collect a consumer debt from Plaintiff arising from an alleged delinquency on a Capital One Bank, N.A. (“Capital One”) account. The account was not used for any commercial purpose. The debt was incurred primarily for personal, household or family use.

10. On or about December 4, 2016, Defendant mailed, or caused to be mailed, a letter to Plaintiff seeking payment of an alleged debt. (The “Demand Letter” is attached hereto as “Exhibit 1”).

11. The Demand Letter states, in pertinent part:

Your account has been listed with Receivables Performance Management for payment processing and collection. If you have any questions or need assistance, please call TOLL FREE 877.297.3159.

Reference Number: 54734163
Creditor: Kohl’s Department Stores, Inc.
Original Creditor: Kohl’s Department Stores, Inc.
Date: 11-30-15

Amount Due: \$541.41

Emphasis in original.

12. The Demand Letter was Defendant's initial communication with Plaintiff with respect to the debt alleged therein.

13. *15 U.S.C. §1692g(a)* states:

Validation of debts

(a) Notice of debt; contents

Within five days after the initial communication with a consumer in connection with the collection of any debt, a debt collector shall, unless the following information is contained in the initial communication or the consumer has paid the debt, send the consumer a written notice containing—

(1) the amount of the debt;

(2) **the name of the creditor to whom the debt is owed;**

(3) a statement that unless the consumer, within thirty days after receipt of the notice, disputes the validity of the debt, or any portion thereof, the debt will be assumed to be valid by the debt collector;

(4) a statement that if the consumer notifies the debt collector in writing within the thirty-day period that the debt, or any portion thereof, is disputed, the debt collector will obtain verification of the debt or a copy of a judgment against the consumer and a copy of such verification or judgment will be mailed to the consumer by the debt collector; and

(5) a statement that, upon the consumer's written request within the thirty-day period, the debt collector will provide the consumer with the name and address of the original creditor, if different from the current creditor.

Emphasis added.

14. The Demand Letter identifies “Kohl’s Department Stores, Inc.” as the “Creditor” for whom Defendant was seeking to collect the debt alleged to be owed by Plaintiff. The Demand Letter also names “Kohl’s Department Stores, Inc.” as the “Original Creditor”.

15. The Demand Letter does not identify the true current creditor as Capital One, nor is Capital One mentioned anywhere in the Demand Letter.

16. Either Defendant falsely and misleadingly identified “Kohl’s Department Stores, Inc.” as the creditor to whom the debt is owed, or does not identify any entity as the current creditor.

17. Capital One is the actual creditor to whom the alleged debt is owed.

18. Any potential *bona fide* error defense which relies upon Defendant’s mistaken interpretation of the legal duties imposed upon it by the *FDCPA* would fail as a matter of law.

19. The Demand Letter was Defendant’s initial communication with Plaintiff.

CLASS ACTION ALLEGATIONS

20. This action is brought on behalf of a Class consisting of (i) all persons with addresses in the Florida Counties that comprise the geographical boundaries of the United States District Court for the Southern District of Florida, namely Miami-Dade, Monroe, Broward, Palm Beach, Martin, Saint Lucie, Indian River, Okeechobee, and Highlands Counties (ii) to whom initial communication letters were mailed, or caused to be mailed, that identified “Kohl’s Department Stores, Inc.” as the creditor to whom a debt was owed when the debt was actually owed to Capital One Bank, N.A., and did not identify the current creditor as Capital One Bank, N.A. (iii) by Defendant (iv) which were not returned undelivered by the U.S. Post Office (v) in an attempt to collect a debt incurred for personal, family, or household purposes (vi) during the one year period prior to the filing of the original Complaint in this action through the date of certification.

21. Defendant's use of initial communication letters sent to consumers having debts owed to Capital One Bank, N.A. that misleadingly identified "Kohl's Department Stores, Inc." as the creditor to whom a debt was owed and did not identify the correct current creditor as Capital One Bank, N.A. is so numerous that joinder of all members of the Class is impractical.

22. There are questions of law or fact common to the Class, which common issues predominate over any issues involving only individual Class members. The common factual issue common to each Class member is that each was mailed, or caused to be mailed, an initial communication letter by Defendant that misleadingly identified the creditor as "Kohl's Department Stores, Inc." when the actual current creditor was Capital One Bank, N.A., who was not identified as the current creditor. The principal legal issue is whether Defendant's misleading identification of the current creditor with regard to the collection of a consumer debt violates the *FDCPA*.

23. Plaintiff's claims are typical of those of the Class members. All are based on the same facts and legal theories.

24. Plaintiff will fairly and adequately protect the interests of the Class. She has retained counsel experienced in handling actions involving unlawful practices under the *FDCPA* and Class actions. Neither Plaintiff nor her counsel have any interests which might cause them not to vigorously pursue this action.

25. Certification of the Class under *Rule 23(b)(3)* of the *Federal Rules of Civil Procedure* is also appropriate in that: (1) the questions of law or fact common to the members of the class predominate over any questions affecting an individual member; and (2) a class action is superior to other available methods for the fair and efficient adjudication of the controversy.

26. Plaintiff requests certification of a Class under *Rule 23(b)(3)* of the *Federal Rules of Civil Procedure* for monetary damages; her appointment as Class Representative; and that her attorney Leo W. Desmond be appointed Class Counsel.

COUNT I
VIOLATION OF 15 U.S.C. § 1692g(a)(2)

27. Plaintiff re-alleges and incorporates Paragraphs 1 through 19.

28. After an initial communication with Plaintiff, pursuant to *15 U.S.C §1692g(a)*, the Defendant must provide the Plaintiff with:

Validation of debts

(a) Notice of debt; contents

Within five days after the initial communication with a consumer in connection with the collection of any debt, a debt collector shall, unless the following information is contained in the initial communication or the consumer has paid the debt, send the consumer a written notice containing—

(1) the amount of the debt;

(2) **the name of the creditor to whom the debt is owed;**

(3) a statement that unless the consumer, within thirty days after receipt of the notice, disputes the validity of the debt, or any portion thereof, the debt will be assumed to be valid by the debt collector;

(4) a statement that if the consumer notifies the debt collector in writing within the thirty-day period that the debt, or any portion thereof, is disputed, the debt collector will obtain verification of the debt or a copy of a judgment against the consumer and a copy of such verification or judgment will be mailed to the consumer by the debt collector; and

(5) a statement that, upon the consumer's written request within the thirty-day period, the debt collector will provide

the consumer with the name and address of the original creditor, if different from the current creditor.

Emphasis added.

29. Defendant mailed, or caused to be mailed, the Demand Letter to Plaintiff in which Defendant stated that the creditor of the alleged debt was “Kohl’s Department Stores, Inc.” in an attempt to collect a consumer debt, namely to collect a past due balance on an account, in which the actual current creditor was Capital One Bank, N.A.

30. Pursuant to the *FDCPA*, the Demand Letter was an initial communication between Defendant and Plaintiff.

31. As a result of Defendant’s conduct, Plaintiff and the Class are entitled to an award of statutory damages pursuant to *15 U.S.C. §1692k*.

32. As a result of Defendant’s conduct, Plaintiff and the Class are entitled to an award of costs and attorney’s fees pursuant to *15 U.S.C. §1692k*.

COUNT II
VIOLATION OF 15 U.S.C. §1692e

33. Plaintiff re-alleges and incorporates Paragraphs 1 through 19 and Paragraphs 28 through 30.

34. Pursuant to *15 U.S.C. §1692g(a)(2)* the Defendant must provide the Plaintiff with:

Validation of debts

(a) Notice of debt; contents

Within five days after the initial communication with a consumer in connection with the collection of any debt, a debt collector shall, unless the following information is contained in the initial communication or the consumer has paid the debt, send the consumer a written notice containing—

XXXX

(2) the name of the creditor to whom the debt is owed;

35. *15 U.S.C. § 1692e(10)* states:

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

xxxx

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.

36. Defendant's Demand Letter mailed to Plaintiff stated that the debt was owed to "Kohl's Department Stores, Inc." as the "Creditor" and the "Original Creditor" in connection with an attempt to collect a consumer debt, namely to collect the balance owed on a charge account.

37. The Demand Letter was a communication used in connection with the collection of a debt between Defendant and Plaintiff.

38. By claiming "Kohl's Department Stores, Inc." was the "Creditor" and the "Original Creditor" to whom the debt was owed, Defendant has attempted to mislead Plaintiff and the Class into believing that the Demand Letter correctly identified the name of the current creditor to whom the debt was owed.

39. Defendant's Demand Letter is misleading and false as it identified "Kohl's Department Stores, Inc." as the "Creditor" when in actuality the actual current creditor to whom the debt was owed is Capital One Bank, N.A.

40. Defendant's Demand Letter is misleading as it does not identify the actual current creditor of the debt sought to be collected upon by Defendant and misidentifies the original creditor of the debt.

41. Defendant's Demand Letter would be deceptive to the least sophisticated consumer with regard to his/her legal rights.

42. As a result of Defendant's conduct, Plaintiff and the Class are entitled to an award of statutory damages pursuant to *15 U.S.C. §1692k*.

43. As a result of Defendant's conduct, Plaintiff and the Class are entitled to an award of costs and attorney's fees pursuant to *15 U.S.C. §1692k*.

RELIEF REQUESTED

WHEREFORE, Plaintiff prays for the following relief:

- a. An Order certifying this matter as a Class Action and appointment of Plaintiff as Class Representative;
- b. An Order appointing Leo W. Desmond as Class Counsel;
- c. An award of statutory damages for Plaintiff and the Class pursuant to *15 U.S.C. §1692k* for all Class claims;
- d. An award of attorney's fees, litigation expenses and costs of the instant suit; and
- e. Such other or further relief as the Court deems proper.

JURY DEMAND

Plaintiff demands trial by jury.

Dated: May 15, 2017

Respectfully submitted,

/s/ Leo W. Desmond

Leo W. Desmond, Esquire
Florida Bar Number 0041920
DESMOND LAW FIRM, P.C.
5070 Highway A1A, Suite D

Vero Beach, Florida 32963
Telephone: 772.231.9600
Facsimile: 772.231.0300
lwd@desmondlawfirm.com
Attorney 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 Brenda J. Howe DEFENDANTS Receivables Performance Management, LLC

(b) County of Residence of First Listed Plaintiff Indian River (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) Leo W. Desmond, Desmond Law Firm, P.C. 5070 Highway A1A, Suite D, Vero Beach, FL 32963 772-231-9600

(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 (Federal Question, Diversity) and Citizenship of Principal Parties (Citizen of This State, Citizen of Another State, Foreign Nation).

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

Large grid of checkboxes for Nature of Suit categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, 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 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 Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity): 15 USC 1692 et seq. Violation of the Fair Debt Collection Practices Act. LENGTH OF TRIAL via 3 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 \$ 500,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE DATE May 15, 2017 SIGNATURE OF ATTORNEY OF RECORD Leo W. Desmond FL BAR 0041920

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44**Authority For Civil Cover Sheet**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Brenda J. Howe

Plaintiff(s)

v.

Receivables Performance Management, LLC

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Receivables Performance Management, LLC
c/o C T Corporation System (Registered Agent)
1200 South Pine Island Road
Plantation, FL 33324

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:

Leo W. Desmond, Esq.
Desmond Law Firm, P.C.
5070 Highway A1A
Suite D
Vero Beach, FL 32963

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:

HSO



Howe, Brenda J
4805 38th Cir Apt 102
Vero Beach, FL 32967-0956

Dear Customer:

Your account has been listed with Receivables Performance Management for payment processing and collection. If you have any questions or need assistance, please call TOLL FREE 877.297.3159.

Reference Number: [redacted] 163
Creditor: Kohl's Department Stores, Inc.
Original Creditor: Kohl's Department Stores, Inc.
Date: 11-30-15
Amount Due: \$541.41

In the event that your payment is by check, we may present your check electronically. In the ordinary course of business, your check will not be provided to you with your bank statement, but a copy can be retrieved by other means.

This communication is from a debt collector. The purpose of this notice is to collect a debt. Any information obtained will be used for that purpose.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice, that you dispute the validity of this debt or any portion thereof, this office will: obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

You may qualify for a settlement, please Call 877.297.3159

Estimado cliente:

Su cuenta ha sido listada con Receivables Performance Management para procesamiento de pago y cobranza. Si tuviese alguna pregunta o necesita ayuda, por favor contáctese a la línea sin cargo 877.297.3159.

Número de referencia: [redacted] 163
Acreedor: Kohl's Department Stores, Inc.
Acreedor Original: Kohl's Department Stores, Inc.
Fecha: 11-30-15
Cantidad adeudada: \$541.41

Si el pago es efectuado en cheque, el mismo será presentado electrónicamente. Siguiendo el curso de la operación, su cheque no le será provisto con el estado de su cuenta bancaria, si bien una copia podrá ser devuelta de otra forma.

Esta comunicación es de un cobrador de morosos. El propósito de esta nota deberá reunir una deuda. Cualquier información obtenida se utilizará para ese propósito.

A menos que usted notifique esta oficina dentro de 30 días después que recibir esta nota que usted disputa la validez de esta deuda o cualquier porción del mismo, esta oficina asumirá que esta deuda es válida. Si usted notifica esta oficina en la escritura dentro de 30 días de recibir esta nota, que usted disputa la validez de esta deuda o cualquier porción del mismo, esta oficina hace: obtiene comprobación de la deuda u obtiene una copia del juicio y le envía una copia de tal juicio o comprobación. Si usted solicita esta oficina en la escritura dentro de 30 días después de recibir esta nota, esta oficina le proporcionará con el nombre y dirección del acreedor original, si diferente del acreedor actual.

Ud. podrá calificar para un acuerdo, contáctese al 877.297.3159.

To ensure proper credit, please cut the bottom portion of this notice and return with your payment.
Para asegurar crédito apropiado, corte por favor la porción inferior de este aviso y vuelva con su pago.

File Number: [redacted] 1587 HSO
Número de archivo

Notice Date.....: 12-04-16
Fecha de notificación

Amount Due.....: \$541.41
Cantidad adeudada

Please make check or money order payable to:
Sírvese enviar cheque o giro bancario a nombre de:

Receivables Performance Management LLC
PO Box 1548
Lynnwood, WA 98046-1548

You can make payments on-line at www.rpmpayments.com
Usted puede hacer pagos en línea en www.rpmpayments.com

355341474342
1453/000727

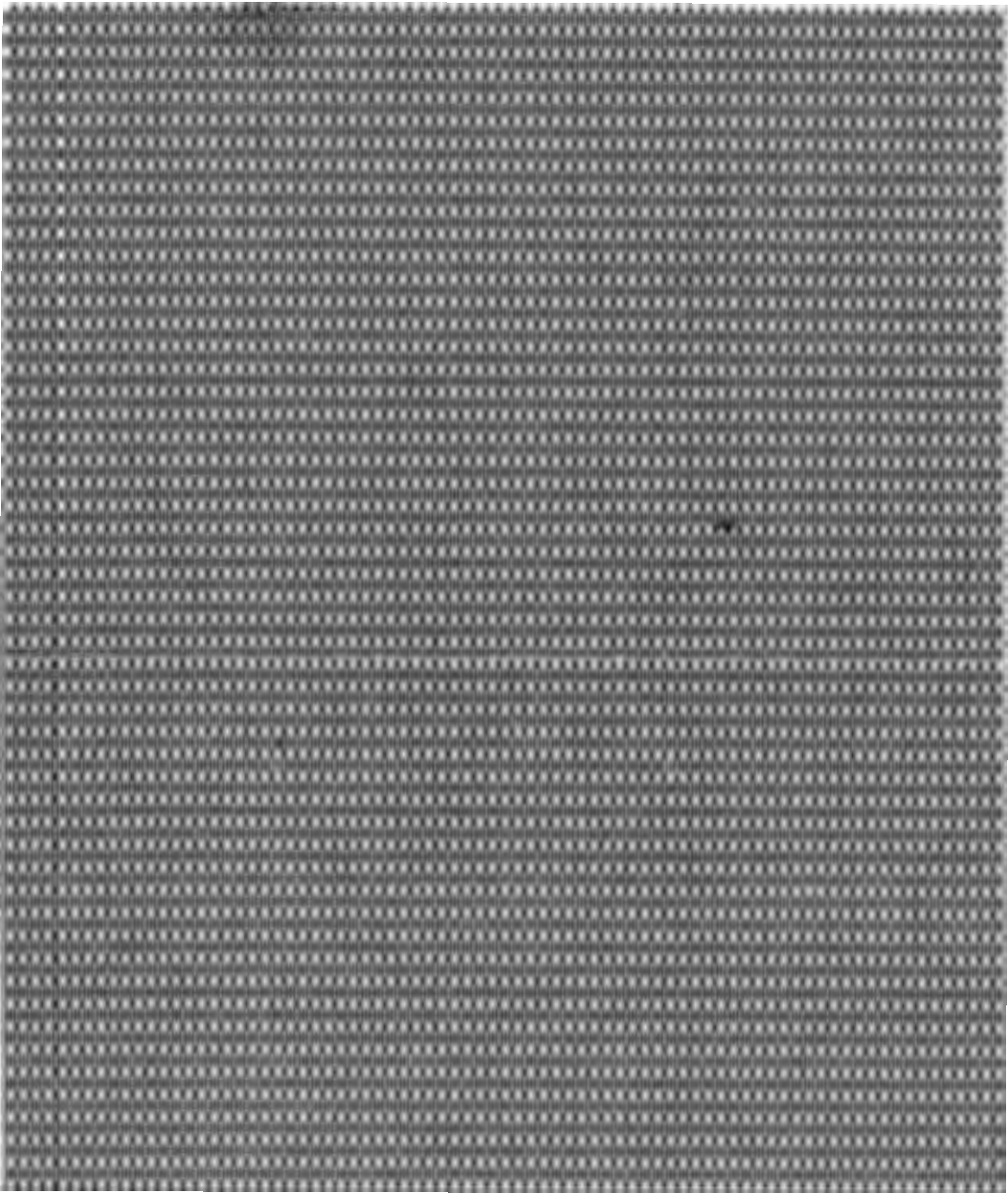
PO Box 2630
Southgate, MI 48195-4630

Presorted
First-Class
US Postage
PAID
RKC

CONFIDENTIAL



Howe, Brenda J
4805 38th Cir Apt 102
Vero Beach, FL 32967-0956



ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Debt Collector Allegedly Names Wrong Creditor, Faces Lawsuit](#)
