

BARSHAY SANDERS, PLLC
100 Garden City Plaza, Suite 500
Garden City, New York 11530
Tel: (516) 203-7600
Fax: (516) 706-5055
Email: *ConsumerRights@BarshaySanders.com*
Attorneys for Plaintiff
Our File No.: 114391

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

Julie Kern, individually and on behalf of all others
similarly situated,

Plaintiff,

vs.

Frontline Asset Strategies, LLC and Velocity
Investments, LLC,

Defendants.

Docket No:

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

BARSHAY | SANDERS PLLC
100 GARDEN CITY PLAZA, SUITE 500
GARDEN CITY, NEW YORK 11530

Julie Kern, individually and on behalf of all others similarly situated (hereinafter referred to as “*Plaintiff*”), by and through the undersigned counsel, complains, states and alleges against Frontline Asset Strategies, LLC and Velocity Investments, LLC (hereinafter referred to collectively as “*Defendants*”), 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, Defendants conducted business within the State of New York.

PARTIES

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

6. Plaintiff is a “consumer” as defined by 15 U.S.C. § 1692a(3).

7. On information and belief, Defendant Frontline Asset Strategies, LLC, is a Minnesota Limited Liability Company with a principal place of business in Ramsey County, Minnesota.

8. On information and belief, Defendant Velocity Investments, LLC, is a New Jersey Limited Liability Company with a principal place of business in Monmouth County, New Jersey.

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

10. Defendants are “debt collectors” as defined by 15 U.S.C. § 1692a(6).

ALLEGATIONS

11. Defendants allege Plaintiff owes a debt (“the Debt”).

12. The Debt was primarily for personal, family or household purposes and is therefore a “debt” as defined by 15 U.S.C. § 1692a(5).

13. Sometime after the incurrence of the Debt Plaintiff fell behind on payments owed.

14. Thereafter, at an exact time known only to Defendants, the debt was assigned or otherwise transferred to Defendants for collection.

15. In their efforts to collect the debt, Defendants contacted Plaintiff by letter (“the Letter”) dated September 25, 2017. (“**Exhibit 1.**”)

16. The letter was the initial communication Plaintiff received from Defendants.

17. The letter is a “communication” as defined by 15 U.S.C. § 1692a(2).

18. 15 U.S.C. § 1692g provides that within five days after the initial communication with a consumer in connection with the collection of any debt, a debt collector shall, unless the information is contained in the initial communication or the consumer has paid the debt, send the consumer a written notice containing certain enumerated information.

19. The written notice must contain the amount of the debt.

20. The written notice must contain the name of the creditor to whom the debt is owed.

21. The written notice must contain 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.

22. The written notice must contain 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.

23. The written notice must contain 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.

24. A debt collector has the obligation, not just to convey the required information, but also to convey such clearly.

25. Even if a debt collector conveys the required information accurately, the debt collector nonetheless violates the FDCPA if that information is overshadowed or contradicted by other language in the communication.

26. Even if a debt collector conveys the required information accurately, the debt collector nonetheless violates the FDCPA if that information is overshadowed by other collection activities during the 30-day validation period following the communication.

27. A collection activity or communication overshadows or contradicts the validation notice if it would make the “least sophisticated consumer” uncertain or confused as to her rights.

28. The manner in which a collection letter is formatted, including but not limited to choice of font size, font type, line breaks, page breaks, and use of transitional language could overshadow a consumer’s validation rights if the letter is formatted in such a way as to render the consumer’s statutorily prescribed validation rights visually inconspicuous.

29. The Letter sets forth Plaintiff’s statutorily prescribed validation rights on the reverse side.

30. While the front side of the Letter sets forth the words “**IMPORTANT NOTICE**” in capitalized, boldfaced font, said “**IMPORTANT NOTICE**” does not inform the consumer

that there is important information on the reverse side of the Letter, but rather that “This communication is from a debt collector and is an attempt to collect a debt. Any information obtained will be used for that purpose.”

31. Thereafter, after a line break and towards the very bottom of the Letter, each Letter states “Please see the reverse side or next page for important consumer notices.”

32. The statement “please see the reverse side or next page for important consumer notices” is set forth in the same font size and type face as the entire body of the Letter, where such body consists of dense text.

33. The statement “Please see the reverse side or next page for important consumer notices” is visually inconspicuous.

34. Due to the visually inconspicuous manner in which the statement “Please see the reverse side or next page for important consumer notices” is presented, the least sophisticated consumer is unlikely to see such statement.

35. As such, the least sophisticated consumer is unlikely to flip to the reverse side of the Letter, and, in turn, unlikely to read her statutorily prescribed validation rights.

36. The manner in which the Letter is formatted would likely make the least sophisticated consumer uncertain as to her rights.

37. The manner in which the Letter is formatted would likely make the least sophisticated consumer confused as to her rights.

38. The manner in which the Letter is formatted would likely result in the least sophisticated consumer overlooking her rights.

39. As a result of the foregoing, the Letter would likely discourage the least sophisticated consumer from exercising her right to dispute the debt.

40. As a result of the foregoing, the Letter would likely discourage the least sophisticated consumer from exercising her right to request validation of the debt.

41. As a result of the foregoing, the threat of possible legal action would likely make the least sophisticated consumer confused as to her rights.

42. As a result of the foregoing, the threat of possible legal action would likely make the least sophisticated consumer uncertain as to her rights.

43. Defendants violated § 1692g as Defendants overshadowed the information required to be provided by that Section.

CLASS ALLEGATIONS

44. Plaintiff brings this action individually and as a class action on behalf of all persons similarly situated in the State of New York from whom Defendants attempted to collect a consumer debt using a collection letter which sets forth the consumer's validation rights in the same fashion as the Letter herein, from one year before the date of this Complaint to the present.

45. This action seeks a finding that Defendants' conduct violates the FDCPA, and asks that the Court award damages as authorized by 15 U.S.C. § 1692k.

46. Defendants regularly engage in debt collection.

47. The Class consists of more than 35 persons from whom Defendants attempted to collect delinquent consumer debts using a collection letter which sets forth the consumer's validation rights in the same fashion as the Letter herein.

48. Plaintiff's 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.

49. 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. Defendants have acted in a manner applicable to the Class as a whole such that declaratory relief is warranted.

50. Plaintiff 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 Defendants' conduct was perpetrated on all members of the Class and will be established by common proof. Moreover, Plaintiff has retained counsel experienced in actions brought under consumer protection laws.

JURY DEMAND

51. Plaintiff hereby demands a trial of this action by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests judgment as follows:

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

DATED: September 10, 2018

BARSHAY SANDERS, PLLC

By: /s/ Craig B. Sanders
Craig B. Sanders, Esq.
100 Garden City Plaza, Suite 500
Garden City, New York 11530
Tel: (516) 203-7600
Fax: (516) 706-5055
csanders@barshaysanders.com
Attorneys for Plaintiff
Our File No.: 114391

Dept 130764
PO Box 1259
Oaks, PA 19456



TO MAKE AN ONLINE PAYMENT ARRANGEMENT VISIT WWW.PAYFRONTLINE.COM



008594

JULIE KERN
474 PENNSYLVANIA AVE
WILLISTON PARK NY 11596-2331

Frontline Asset Strategies, LLC
2700 Snelling Ave N.
Ste 250
Roseville, MN 55113



Date: 09/25/2017

Current Creditor to whom the debt is owed:	Velocity Investments, LLC
Original Creditor:	Santander Consumer Usa
Original Creditor#:	XXXXXXXXXXXX1000
Charge-off Date:	08/31/2011
FAST #:	██████████6302
Total Amount Due:	\$12,073.50
Last Pay Date:	05/17/2011
Total Due as of Charge-off:	\$12073.50
Total Interest Accrued Since Charge-off:	\$0.00
Total non-interest Charges or Fee Accrued Since Charge-off:	\$0.00
Total Paid on Debt Since Charge-off:	\$0.00

Dear JULIE KERN:

WE ARE REQUIRED BY LAW TO GIVE YOU THE FOLLOWING INFORMATION ABOUT THIS DEBT. The legal time limit (statute of limitations) for suing you to collect this debt has expired. However, if somebody sues you anyway to try to make you pay this debt, court rules REQUIRE YOU to tell the court that the statute of limitations has expired to prevent the creditor from obtaining a judgment. Even though the statute of limitations has expired, you may CHOOSE to make payments. However, BE AWARE: if you make a payment, the creditor's right to sue you to make you pay the entire debt may START AGAIN.

As required by the New York State Department of Financial Services, we are also required to provide notices additional to those above. Responding to the court that the statute of limitations has expired may allow you to stop the lawsuit. Suing on a debt for which the statute of limitations has expired is a violation of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. Also, if you admit to owing the debt, promise to pay the debt, or waive the statute of limitations on the debt, the time period in which the debt is enforceable in court may start again. You are not required to provide the debt collector with an admission, affirmation, or acknowledgement of the debt, a promise to pay the debt, or a waiver of the statute of limitations.

IMPORTANT NOTICE

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

Please see the reverse side or next page for important consumer notices.
Frontline Asset Strategies, LLC • 2700 Snelling Ave N. • Ste 250 • Roseville, MN 55113
Toll Free: 877-258-1590 Fax: 6516212879
Hours of Operation: Monday-Friday 7AM-9PM CST • Saturday 8AM-12PM CST

MEMBER



INTERNATIONAL
The Association of Credit
and Collection Professionals



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:

- The use or threat of violence; the use of obscene or profane language; and 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.

Your account has been turned over to Frontline Asset Strategies, LLC for collection. As of the date of this letter, you owe \$12,073.50.

The law limits how long you can be sued on a debt. Because of the age of your debt, Velocity Investments, LLC will not sue you for it, and Velocity Investments, LLC will not report it to any credit reporting agency.

We strive to work with you in resolving this outstanding debt. Please call 877-258-1590 to make payment in full or to see what payment options may be available to you. You may also go to www.frontlineas.com/contact/ in order to chat with a live agent.

Thank you for your time and attention regarding the resolution of this debt. Nothing contained in this letter changes or alters your consumer rights. Calls to or from this company, along with communications via live chat, may be monitored or recorded.

Sincerely,
Troy Tratar
877-258-1590
Frontline Asset Strategies, LLC

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, in writing, of this office 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.

City of New York, Department of Consumer Affairs License Number is 1301837.

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: JULIE KERN
(b) County of Residence of First Listed Plaintiff: NASSAU
(c) Attorneys: BARSHAY SANDERS, PLLC
DEFENDANTS: FRONTLINE ASSET STRATEGIES, LLC
County of Residence of First Listed Defendant: RAMSEY
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)
III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
O 1 U.S. Government Plaintiff
O 2 U.S. Government Defendant
O 3 Federal Question (U.S. Government Not a Party)
O 4 Diversity (Indicate Citizenship of Parties in Item III)
Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
O 1 O 1
O 2 O 2
O 3 O 3
PIF DEF
O 4 O 4
O 5 O 5
O 6 O 6

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

V. ORIGIN (Place an "X" in One Box Only)
O 1 Original Proceeding
O 2 Removed from State Court
O 3 Remanded from Appellate Court
O 4 Reinstated or Reopened
O 5 Transferred from Another District (specify)
O 6 Multidistrict Litigation - Transfer
O 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 O No

VIII. RELATED CASE(S) IF ANY
JUDGE
DOCKET NUMBER

DATE: September 13, 2018
SIGNATURE OF ATTORNEY OF RECORD: /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

Julie Kern, individually and on behalf of all others
similarly situated,

Plaintiff(s)

v.

Civil Action No.

Frontline Asset Strategies, LLC and Velocity
Investments, LLC,

Defendant(s)

SUMMONS IN A CIVIL ACTION

To:(Defendant's name and address)

Frontline Asset Strategies, LLC
C/O CT CORPORATION SYSTEM
111 EIGHTH AVENUE
NEW YORK, NEW YORK, 10011

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

UNITED STATES DISTRICT COURT

for the

EASTERN DISTRICT OF NEW YORK

Julie Kern, individually and on behalf of all others
similarly situated,

Plaintiff(s)

v.

Civil Action No.

Frontline Asset Strategies, LLC and Velocity
Investments, LLC,

Defendant(s)

SUMMONS IN A CIVIL ACTION

To:(Defendant's name and address)

Velocity Investments, LLC
1800 Route 34 North , BLDG #4, STE 404A
Wall, New Jersey 07719

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

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Consumer Claims Frontline Asset Strategies, Velocity Investments Overshadowed Debt Dispute Rights](#)
