

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

JENNIFER R. LARKIN, individually and on)	
behalf of all those similarly situated,)	
)	
Plaintiff,)	
)	
vs.)	Civil Action No.: 1:18-cv-00496
)	
FINANCE SYSTEM OF GREEN BAY,)	
INC., and JOHN DOES 1-25,)	
)	
Defendants.)	

**CLASS ACTION COMPLAINT FOR VIOLATIONS OF
THE FAIR DEBT COLLECTION PRACTICES ACT
AND DEMAND FOR JURY TRIAL**

Plaintiff, JENNIFER R. LARKIN (now known as Jennifer Mraz), individually and on behalf of all others similarly situated, by way of Complaint against Defendants, FINANCE SYSTEM OF GREEN BAY, INC. (“FSGB”), and JOHN DOES 1-25 (“DOES”), says:

I. NATURE OF THE ACTION

1. This action is brought by Plaintiff, individually and on behalf of the class she seeks to represent, and demanding a trial by jury, for the illegal practices of the Defendants who used unfair, unconscionable, false, deceptive, and misleading practices, and other illegal practices, while attempting to collect alleged debts from Plaintiff in violation of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (“FDCPA”).

2. Such collection practices include sending consumers written communications to collect debts which falsely represent that Defendants’ client, a healthcare provider and the original creditor, maintains credit ratings on state its patients.

3. The FDCPA regulates the behavior of collection agencies attempting to collect a debt on behalf of another. The United States Congress found abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many debt collectors, and determined that such practices contribute to the number of personal bankruptcies, marital instability, loss of jobs, and invasions of individual privacy. Congress enacted the FDCPA to eliminate abusive debt collection practices by debt collectors, to ensure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged, and to promote uniform State action to protect consumers against debt collection abuses. 15 U.S.C. § 1692(a) - (e).

4. The FDCPA is a strict liability statute which provides for actual or statutory damages upon the showing of one violation. The Seventh Circuit has held that whether a debt collector's conduct violates the FDCPA should be judged from the standpoint of the "unsophisticated debtor." *Gammon v. GC Servs. Ltd. P'ship*, 27 F.3d 1254, 1257 (7th Cir. 1994).

5. Plaintiff, individually and on behalf of all others similarly situated, seeks such appropriate relief as is provided for under the FDCPA.

II. PARTIES

6. Plaintiff is a natural person.

7. At all times relevant to the factual allegations of this Complaint, Plaintiff was a citizen of, and resided in, the Village of Luxemburg, Kewaunee County, Wisconsin.

8. At all times relevant to this complaint, FSGB is a corporation formed pursuant to the laws of the State of Wisconsin.

9. On information and belief, FSGB maintains its principal place of business at 301 North Jackson Street, City of Green Bay, Brown County, Wisconsin.

10. DOES are sued under fictitious names as their true names and capacities are yet unknown to Plaintiff. Plaintiff will amend this complaint by inserting the true names and capacities of the DOE defendants once they are ascertained.

11. On information and belief, and based on advice of counsel, DOES are natural persons and/or business entities all of whom reside or are located within the United States who personally created, instituted and, with knowledge that such practices were contrary to law, acted consistent with, conspired with, engaged in, and oversaw the violative policies and procedures used by the employees of FSGB that are the subject of this Complaint. DOES personally control, and are engaged in, the illegal acts, policies, and practices utilized by FSGB and, therefore, are personally liable for all the wrongdoing alleged in this Complaint.

III. JURISDICTION AND VENUE

12. Jurisdiction of this Court arises under 15 U.S.C. § 1692k(d) and 28 U.S.C. § 1331.

13. Venue is appropriate in this federal district pursuant to 28 U.S.C. § 1391 because the events giving rise to the claims occurred within this federal judicial district, and because the named Defendants regularly transacts business within this federal judicial district and, therefore, reside in the State of Wisconsin within the meaning of 28 U.S.C. § 1391(b) and (c).

IV. FACTUAL ALLEGATIONS

14. FSGB is regularly engaged in the collection of debts.

15. FSGB regularly collects or attempts to collect debts alleged to be owed others.

16. FSGB is a business the principal purpose of which is the collection of debts.

17. In attempting to collect debts, Defendants use the mails, telephone, the internet, and other instruments of interstate commerce.

18. Defendants mailed a letter (“LETTER”) to Plaintiff dated March 28, 2017.

19. A true and correct copy of the LETTER is attached as *Exhibit A*, except that the undersigned counsel has, in accordance with Fed. R. Civ. P. 5.2, partially redacted the financial account numbers and Plaintiff's home address to protect Plaintiff's privacy.

20. On information and belief, the LETTER was created by merging information specific to a debt with a template to create what is commonly called a "form letter."

21. Consequently, on information and belief, the same form was mailed to others at Wisconsin addresses in Defendants' attempts to collect debts.

22. Based on the information in the LETTER, Defendants have asserted that Plaintiff is obligated to pay money ("Debt") to "Green Bay Radiology SC." On information and belief, that obligation is alleged to arise from one or more transactions primarily for personal, family, or household purposes—specifically, it is alleged to arise from services related to Plaintiff's healthcare.

23. The Debt was placed with, obtained by or assigned to Defendants for the purpose of collecting or attempting to collect the Debt.

24. Defendants contend the Debt is in default and was in default at the time it was placed with, obtained by or assigned to Defendants.

25. In an attempt to collect the Debt, Defendants mailed Plaintiff the LETTER.

26. The LETTER is confusing, misleading, and deceptive to the unsophisticated consumer.

27. The LETTER falsely implied to the unsophisticated consumer that Defendants had a confidence in Plaintiff.

28. The LETTER falsely implied to the unsophisticated consumer that Green Bay Radiology SC placed faith in Plaintiff.

29. The LETTER falsely implied to the unsophisticated consumer that Green Bay Radiology maintained a credit rating for Plaintiff and that, as of the date of the LETTER, Green Bay Radiology SC gave Plaintiff a “good credit rating.”

V. CLASS ALLEGATIONS

30. Plaintiff brings this action individually and as a class action on behalf of all other persons similarly situated pursuant to Fed. R. Civ. P. 23.

31. Subject to discovery and further investigation which may cause Plaintiff to modify the class definition to be more inclusive or less inclusive, Plaintiff defines the “Class” to include:

Each natural person to whom Finance System of Green Bay, Inc. mailed (or arranged for the mailing of) a letter during the Class Period to a Wisconsin address in connection with an attempt to collect for Green Bay Radiology SC included one of the following:

“You do not want to lose our confidence.”

“You want to be worthy of the faith put in you by your creditor;” *or*

“We are interested in you preserving a good credit rating with the above creditor.”

32. The Class excludes each person who, prior to the date this action is certified to proceed as a class action, either (a) died, (b) obtained a discharge in bankruptcy, (c) commenced an action in any court against Defendants alleging a violation of the FDCPA based on a letter, or (d) signed a general release of claims against FSGB. The Class also excludes counsel for Plaintiff as well as all employees and members of the immediate family of counsel for Plaintiff.

33. Based on discovery and further investigation (including, but not limited to, disclosure of class size and net worth), Plaintiff may, in addition to moving for class certification using modified definitions of the Class and Class Claims, seek class certification only as to

particular issues as permitted under Fed. R. Civ. P. 23(c)(4).

34. The identity of each member of the Class is readily ascertainable from the records of Defendants and those records of the entity on whose behalf Defendants sought to collect debts.

35. This action has been brought, and may properly be maintained, as a class action pursuant to the provisions of Fed. R. Civ. P. 23(a) because there is a well-defined community interest in the litigation in that:

35.01. **Numerosity.** The members of the Class are so numerous that joinder of all members would be impractical. On information and belief, there are at least 40 members of the Class.

35.02. **Commonality.** Common questions of law and fact exist as to all members of the Class, the principal issues are: whether the conduct of Defendants, as described above under *Factual Allegations*, was the same or substantially similar with respect to the attempts by Defendants to collect debts from Plaintiff and the members of the Class; and whether such conduct violated the FDCPA and the TDCPA.

35.03. **Typicality.** The claims of Plaintiff are typical of the claims of the class members. Plaintiff and all members of the Class have claims arising out of the common and uniform course of conduct as set forth in the *Factual Allegations*.

35.04. **Adequacy.** Plaintiff will fairly and adequately protect the interests of the class members because the interests of Plaintiff are not known or believed to be adverse to the absent class members. Plaintiff ~~Choose an item.~~ committed to vigorously litigating this matter. Plaintiff retained counsel experienced in

handling consumer lawsuits, complex legal issues, and class actions.

36. This action may be maintained as a “B1a-class”, a “B2-class”, a “B3-class”, or a hybrid class however, at the time of commencing this action, certification is expected to be sought under Fed. R. Civ. P. 23(b)(3) because the questions of law and fact common to members of the Class appear to predominate over any questions affecting an individual member, and a class action would be superior to other available methods for the fair and efficient adjudication of the controversy due to individual joinder of all members being impracticable, class action treatment will permit a large number of similarly situated persons to prosecute their common claims in a single forum efficiently and without unnecessary duplication of effort and expense that individual actions would engender, an important public interest will be served by addressing the matter as a class action, substantial expenses to the litigants and to the judicial system will be realized, and difficulties are unlikely in the management of a class action.

VI. COUNT ONE: VIOLATION OF THE FDCPA.

37. The *Factual Allegations* are incorporated by reference.
38. FSGB is a “debt collector” within the meaning of 15 U.S.C. § 1692a(6).
39. Each of the DOES is a “debt collector” within the meaning of 15 U.S.C. § 1692a(6).
40. The Debt is a “debt” within the meaning of 15 U.S.C. § 1692a(5).
41. Plaintiff is a “consumer” within the meaning of 15 U.S.C. § 1692a(3).
42. The LETTER is a “communication” within the meaning of 15 U.S.C. § 1692a(2).
43. Defendants failed to comply with the FDCPA with respect to Plaintiff.
44. Such failure includes but is not limited to using false, deceptive, or misleading representations and/or means in connection with the collection of any debt, which constitutes a violation of 15 U.S.C. §1692e, and using unfair or unconscionable means to collect or attempt to

collect a debt in violation of 15 U.S.C. § 1692f.

45. The conduct of Defendants invaded the rights of Plaintiff which are protected by the FDCPA, the invasion of which caused injury-in-fact.

46. Based on a single violation of the FDCPA, Defendants are liable to Plaintiff and, if this case is maintained as a class action under Fed. R. Civ. P. 23, to the Class for such relief as is allowed under 15 U.S.C. § 1692k.

VII. PRAYER FOR RELIEF.

47. WHEREFORE, Jennifer R. Larkin, Plaintiff, respectfully requests the Court enter judgment against Defendants, FINANCE SYSTEM OF GREEN BAY, INC., and JOHN DOES 1-25, jointly and severally, as follows:

47.01. Certifying this action may be maintained as a class action pursuant to Fed. R. Civ. P. 23 including defining the class, defining the class claims, and appointing the attorneys for Plaintiff as class counsel;

47.02. An award of actual damages for Plaintiff and the Class pursuant to 15 U.S.C. § 1692k(a)(2)(B) including, but not limited to, damages to the extent the recovery of attorneys' fees and costs causes Plaintiff a negative tax consequence;

47.03. Awarding statutory damages for Plaintiff pursuant to 15 U.S.C. § 1692k(a)(2)(A) and § 1692k(a)(2)(B)(i);

47.04. Awarding of statutory damages for the Class pursuant to 15 U.S.C. § 1692k(a)(2)(B)(ii);

47.05. An incentive award for Plaintiff, in connection with Plaintiff's services to the Class in an amount to be determined by the Court after judgment is entered in favor of the Class;

- 47.06. Adjudging this action to be a successful action under 15 U.S.C.
§ 1692k(a)(2)(B)(3) and awarding reasonable attorneys' fees including litigation expenses;
- 47.07. Awarding costs of suit as allowed by law; and
- 47.08. For such other and further relief as may be just and proper.

VIII. JURY DEMAND.

48. Demand is hereby made for trial by jury.

Respectfully submitted this 28th Day of March 2018.

s/ Andrew T. Thomasson

Philip D. Stern (NJ Bar # 045921984)
Andrew T. Thomasson (NJ Bar # 048362011)
STERN•THOMASSON LLP
150 Morris Avenue, 2nd Floor
Springfield, NJ 07081-1315
Telephone: (973) 379-7500
Facsimile: (973) 532-5868
E-Mail: philip@sternthomasson.com
E-Mail: andrew@sternthomasson.com

Attorneys for Plaintiff, Jennifer R. Larkin

Exhibit A



PO Box 1597
Green Bay WI 54305

ADDRESS SERVICE REQUESTED



301 N. Jackson Street
Green Bay, WI 54301
Phone: (920) 431-2121

Date	Total Bal.
3/28/2017	\$57.08

PRGB1 387795324



Jennifer R Larkin

REDACTED

REDACTED
REDACTED

REDACTEDREDACTED

Finance System of Green Bay, Inc.

P.O. Box 1597
Green Bay, WI 54305-1597



Detach Upper Portion And Return With Payment

RE: GREEN BAY RADIOLOGY SC
PROFESSIONAL BILLING SERVICE
2941 S RIDGE RD
GREEN BAY WI 54304
920-336-4096

BALANCE DUE: \$57.08

ACCOUNT NUMBER: REDACTED

THIS IS OUR SECOND REMINDER!

You do not want to lose our confidence. You want to be worthy of the faith put in you by your creditor; yet the above past due account remains unpaid, possibly through an oversight on your part.

Please contact your creditor or our office to make arrangements for payment on the above account. We are interested in you preserving a good credit rating with the above creditor.

1RDFSGB01PRGB1

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.)

Place an "X" in the appropriate box (required): Green Bay Division Milwaukee Division

I. (a) PLAINTIFFS

JENNIFER R. LARKIN, individually and on behalf of all those similarly situated

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

(c) Attorneys (Firm Name, Address, and Telephone Number)

Stern Thomasson LLP
150 Morris Avenue, 2nd Floor
Springfield, NJ 07081-1315
(973) 379-7500

DEFENDANTS

FINANCE SYSTEM OF GREEN BAY, INC., and JOHN DOES 1-25

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

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

- | | | | | | |
|-----------------------------------------|----------------------------|----------------------------|---------------------------------------------------------------|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

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

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729 (a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

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

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from Another District (specify)
- 6 Multidistrict Litigation - Transfer
- 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

15 USC §1692 et seq.

Brief description of cause:

Claims under Fair Debt Collection Practices Act

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$
500,000.00

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

03/28/2018

SIGNATURE OF ATTORNEY OF RECORD

s/ Andrew T. Thomasson

UNITED STATES DISTRICT COURT

for the Eastern District of Wisconsin

JENNIFER R. LARKIN, individually and on behalf of all those similarly situated

Plaintiff(s)

v.

FINANCE SYSTEM OF GREEN BAY, INC., and JOHN DOES 1-25

Defendant(s)

Civil Action No. 1:18-cv-00496

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) FINANCE SYSTEM OF GREEN BAY, INC. 301 North Jackson Street Green Bay, Wisconsin 54301

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you receive 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 the plaintiff's attorney, whose name and address are:

Stern Thomasson LLP 150 Morris Avenue, 2nd Floor Springfield, NJ 07081-1315

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.

STEPHEN C. DRIES, CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

PROOF OF SERVICE

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

This summons and the attached complaint for *(name of individual and title, if any)*:

_____ were received by me on *(date)* _____.

I personally served the summons and the attached complaint on the individual at *(place)*:

_____ on *(date)* _____ ; or

I left the summons and the attached complaint 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 and the attached complaint 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: [Debt Collection Suit Filed Against Finance System of Green Bay](#)
