

FILED

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

LC TECHNOLOGY INTERNATIONAL, INC., a Florida corporation, individually and on behalf of all others similarly situated,

Plaintiff,

v.

HARVARD RISK MANAGEMENT CORPORATION, a Delaware corporation, and **PRE-PAID LEGAL SERVICES, INC. D/B/A LEGALSHIELD** an Oklahoma corporation,

Defendants.

Case No.

8:18-cv-01759-T-33-TGW

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

CLASS ACTION COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff LC Technology International, Inc. (“LC Technology” or “Plaintiff”) brings this Class Action Complaint against Defendants Harvard Risk Management Corporation (“Harvard Risk”) and Pre-Paid Legal Services, Inc. D/B/A LegalShield (“LegalShield” and together with Harvard Risk, “Defendants”), to stop their practice of sending unsolicited fax advertisements to consumers and businesses, and to obtain redress for all persons or entities similarly injured by their conduct. Plaintiff LC Technology, for its Class Action Complaint, allege as follows upon personal knowledge as to itself and its own acts and experiences, and, as to all other matters, upon information and belief, including investigation conducted by its attorneys.

INTRODUCTION


1. LegalShield and Harvard Risk are engaged in a pyramid sales scheme to sell legal service and identity theft prevention products under the LegalShield and IDShield brands. As part of their marketing scheme Defendants engage in unsolicited fax marketing.

TPA051944

2. Defendants’ unsolicited faxes describe the features and benefits of – and promote the purchase of – LegalShield and IDShield branded legal service and identity theft prevention products:






727-812-1763

P.1




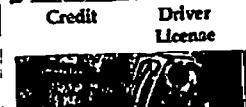
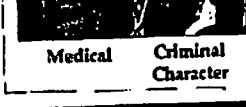
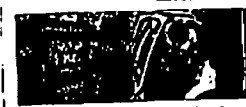
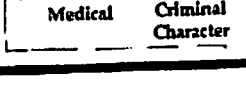
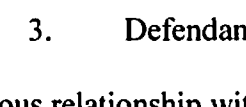
For Additional Information Please Contact:


Robyn Mislevy
 (727) 410-1809
 r.mislevy@harvardbenefits.com
 www.seeyourbenefits.com/274614

PREVENTIVE LAW	ESTATE PLANNING	MOTOR VEHICLE	OTHER MATTERS	FAMILY COVERAGE
<ul style="list-style-type: none"> Toll-free phone consultation for any personal legal matter, even pre-existing conditions 24/7 emergency access Letters and phone calls Legal document review Access to legal forms online 	<ul style="list-style-type: none"> Preparation of a Last Will and Testament and annual updates, includes family members Preparation of a healthcare Power of Attorney Preparation of a Living Will and a Minor Trust 	<ul style="list-style-type: none"> Assistance with moving traffic violations Driver license assistance and assistance with personal injury/physical damage Representation for traffic accidents 15 day waiting period 	<ul style="list-style-type: none"> Lawsuit & IRS audit services Residential loan document preparation Uncontested name change and adoption assistance Uncontested separation and divorce representation 	<ul style="list-style-type: none"> The Family Plan covers member, spouse (significant other) and qualified dependents 25% discount on legal issues not covered under the plan including pre-existing matters

COMMON TYPES OF IDT

 Credit	 Driver License	 Employment SSN/IRS
 Medical	 Criminal Character	 Minor Children



Service Features & Benefits

- Complete Credit Analysis
- Credit Inquiry Alerts
- Identity Consultation Services
- Quarterly Credit Score Tracker
- Identity Restoration by Licensed Private Investigators
- Daily ID Monitoring
- Minor Child Coverage
- \$5 Million Dollar Service Guarantee
- 24/7/365 Emergency Access

Summary of benefits only. See membership policy for complete details, restrictions and exclusions.

3. Defendants sent the faxes at issue to Plaintiff and the Class despite having no previous relationship with them and despite never having obtained consent to send such faxes.

4. As such, Defendants’ fax advertisements violated the Telephone Consumer Protection Act, 47 U.S.C. § 227 (“TCPA”), and caused Plaintiff and putative members of the Class to suffer actual harm, including the occupation of their fax lines and fax machines, the aggravation and nuisance of receiving such faxes, as well as the wasted ink, toner, and paper the

consumer shoulders for the Defendants' fax blasts.

5. Accordingly, Plaintiff seeks an injunction requiring Defendants to cease all unauthorized fax-based marketing activities, as well as an award of actual and/or statutory damages and costs.

PARTIES

6. Plaintiff LC Technology International, Inc. is a Florida corporation headquartered in Clearwater, Florida.

7. Defendant Harvard Risk Management Corporation is a Delaware corporation headquartered in Dallas, Texas. Harvard Risk does business in the State of Florida and throughout the United States.

8. Defendant Pre-Paid Legal Services, Inc. d/b/a LegalShield is an Oklahoma corporation headquartered in Ada, Oklahoma. Pre-Paid Legal does business in the State of Florida and throughout the United States.

JURISDICTION & VENUE

9. This Court has federal question subject matter jurisdiction over this action pursuant to 28 U.S.C. §1331, as the action arises under TCPA.

10. The Court has personal jurisdiction over Defendants and venue is proper in this District because Defendant Harvard Risk is registered to do business in the State of Florida, Defendants regularly conducts business in the State of Florida and in this District, and Plaintiff's claims arise from solicitations and/or tortious conduct directed into this District.

11. Venue is proper in this District because a significant portion of the events described throughout this Complaint took place within this District, Plaintiff is located in this District, and the faxes were sent to this District.

COMMON ALLEGATIONS OF FACT

LegalShield Operates A Pyramid Scheme Involving Harvard Risk's Sale Of Its Legal Service And Identity Theft Protection Products¹

12. LegalShield runs a multi-level marketing scheme to attempt to shield itself from liability for its marketing practices.

13. Harvard Risk is one of the top performing marketing agents for Legal Shield. In fact, Harvard Risk exists only to sell LegalShield products including LegalShield and IDShield.

14. Harvard Risk's CEO Mark Riches holds the highest title in LegalShield: "Platinum Executive Director for LegalShield."⁷ Riches achieved this title because, through his company Harvard Risk, he has recruited thousands of Associates to sell LegalShield's products under him.

15. Not surprisingly, when an Associate signs up with Harvard Risk they do so on the condition that they must either (1) sign up three people for LegalShield products *and* recruit one other LegalShield Associate, or (2) sign up six people for LegalShield products:

The screenshot shows a web browser window with the URL <https://harvardbenefits.com/fsq.php>. The page header includes the Harvard Risk Management Corporation logo and navigation links: HOME, ABOUT US, OUR SERVICES, CAREERS, CONTACT US, and AG. A search bar is present with the text "Search here..." and a "SEARCH" button. Below the header, the text "Welcome Dan Wener Logout" is visible. The main content area is titled "FAST START COMMITMENT FORM" and features a row of icons: a gear, a document, an envelope, a calendar, a play button, a location pin, a house, "CMS AMS", a grid, a shopping cart, a magnifying glass, a video camera, and a speech bubble. Below the icons, a paragraph of text reads: "The following form may be used to submit your formal commitment to Fast Start Qualify by a certain date. In order to Fast Start Qualify an agent must write three LegalShield memberships and recruit one LegalShield Associate, or write six LegalShield memberships."

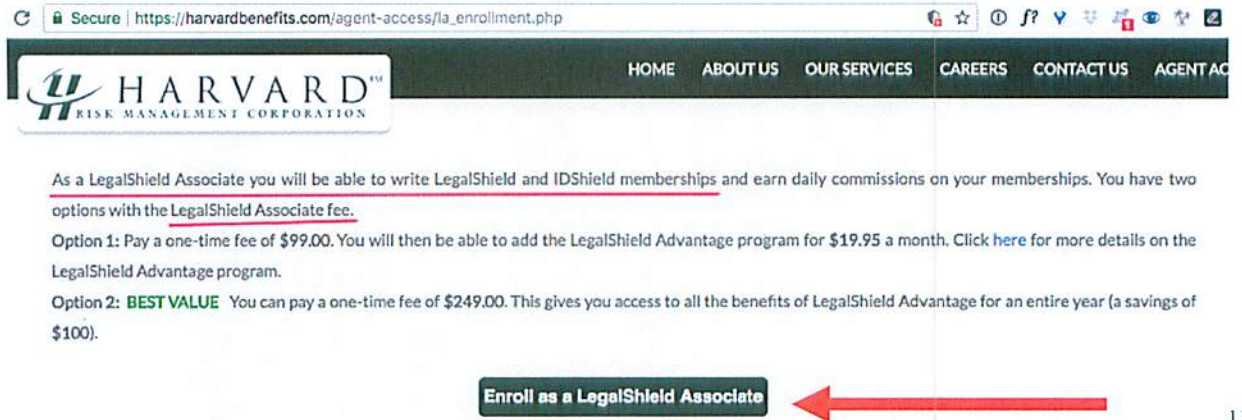
10

¹<https://web.archive.org/web/20021015101344/http://attorneygeneral.state.wy.us/CPU1PR113001.pdf>; <https://www.thestreet.com/story/10209942/1/pre-paid-weather-guilty-verdict.html/>; <https://newsok.com/article/3479952/ftc-ends-investigation-of-pre-paid-legal>.

⁷ <https://vimeo.com/215363104>.

¹⁰ <https://harvardbenefits.com/fsq.php>.

16. And in fact, every Harvard Risk Associate is also required to be a LegalShield Associate, and each such Harvard Risk/LegalShield shared Associate must pay a LegalShield “Associate fee,” which is either a one-time fee of \$99 per year and a monthly fee of \$19.95 or a yearly flat fee of \$249.



17. Each Harvard Risk/LegalShield shared Associate is directed by Harvard Risk to use the LegalShield online sales system at <https://online.legalshield.com/dashboard> and function as a LegalShield Associate. Clearly, a Harvard Risk agent is also a shared LegalShield Associate.

18. Harvard Risk and LegalShield jointly train Associates and are aware of their joint Associates’ marketing practices.¹⁴

Defendants distribute manuals and other training materials and programs to provide their Associates guidelines for marketing and distributing LegalShield products. Primary in the training are explanations of how to sell LegalShield branded legal service products and IDShield branded identity theft protection products (and Defendants’ shared compensation plan for Associates that do so).¹⁸

¹¹ https://harvardbenefits.com/agent-access/la_enrollment.php

¹⁴ <https://harvardbenefits.com/agent-access/>

¹⁸ <https://harvardbenefits.com/agent-access/new-agent-training.php>

19. Defendants also generate for their Associates standard marketing materials for the LegalShield and IDShield products including some of which are fax-marketing ready:

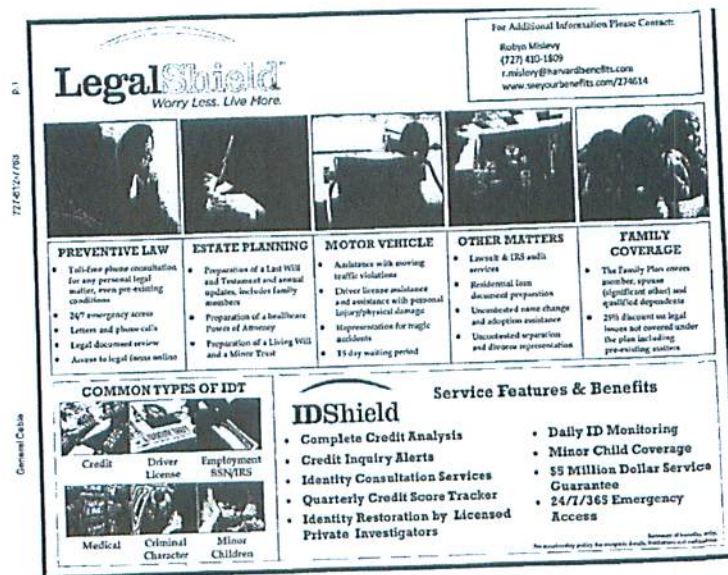
LegalShield/IDShield Placemat Brochures (single sided)



19

FACTS SPECIFIC TO PLAINTIFF LC TECHNOLOGY

20. On September 19, 2016 at 2:48 pm, Defendants transmitted by telephone facsimile machine to Plaintiff LC Technology an unsolicited fax advertisement disseminated by Defendants for use by their shared Associates:



¹⁹ <http://www.hrctestore.com/legalshieldidshield-placemat-brochures-single-sided>.

(A copy of the fax advertisement sent by Defendants to Plaintiff is also attached as Exhibit A.)

21. The facsimile message advertises group legal plans and identity theft services offered under the LegalShield and IDShield brands. The agent that sent the fax is identified on the facsimile as being associated with Harvard Benefits and is therefore also a LegalShield Associate.

22. Harvard Risk and LegalShield jointly profited by and received the benefits of this type of fax marketing.

23. Plaintiff LC Technology had not invited or given permission to Defendants to send the fax advertisement and had no prior relationship with Defendants.

24. On information and belief, Defendants faxed the same unsolicited facsimile message to Plaintiff LC Technology and more than 40 other recipients without first receiving the recipients' express permission or invitation.

25. There is no reasonable means for Plaintiff LC Technology (or any other class member) to avoid receiving unauthorized faxes. Fax machines are left on and ready to receive the urgent communications their owners actually desire to receive.

CLASS ACTION ALLEGATIONS

26. Plaintiff LC Technology brings this action pursuant to Federal Rules of Civil Procedure 23(b)(2) and 23(b)(3) individually and on behalf of Class of similarly situated individuals as follows:

All persons and entities who (1) on or after four years prior to the filing of the initial complaint in this action, (2) received a telephone facsimile advertisement, (3) sent from or on behalf of Defendants, (4) from whom Defendants did not have a record of prior express consent to send the facsimile advertisements.

27. The following individuals are excluded from the Class: (1) any Judge or Magistrate presiding over this action and members of their families; (2) Defendants, their subsidiaries, parents, successors, predecessors, and any entity in which Defendants or their parents have a controlling interest and their current or former employees, officers and directors; (3) Plaintiff's attorneys; (4) persons who properly execute and file a timely request for exclusion from the Class; (5) the legal representatives, successors or assigns of any such excluded persons; and (6) persons whose claims against Defendants have been fully and finally adjudicated and/or released. Plaintiff anticipates the need to amend the class definitions following appropriate discovery.

28. Numerosity: The exact size of the Class is unknown and unavailable to Plaintiff at this time, but it is clear that individual joinder is impracticable. On information and belief, Defendants faxed unsolicited advertisements to thousands of individuals and entities who fall into the definition of the Class. Class membership can be easily determined from Defendants' records.

29. Typicality: Plaintiff's claims are typical of the claims of the other members of the Class. Plaintiff is a member of the Class, and if Defendants violated the TCPA with respect to Plaintiff, then they violated the TCPA with respect to the other members of the Class. Plaintiff and the Class sustained damages as a result of Defendants' uniform wrongful conduct.

30. Commonality and Predominance: There are many questions of law and fact common to the claims of Plaintiff and the Class, and those questions predominate over any questions that may affect individual members of the Class. Common questions for the Class include, but are not necessarily limited to the following:

- a) How Defendants gathered, compiled, or obtained fax numbers of Plaintiff and the Class;

b) Whether Defendants' faxes advertised the commercial availability or quality of property, goods, or services;

c) Whether Defendants sent the fax advertisements without first obtaining Plaintiff and the Class's prior express consent to do so; and

d) Whether Defendants' conduct was willful such that Plaintiff and the Class are entitled to treble damages.

31. Adequate Representation: Plaintiff will fairly and adequately represent and protect the interests of the Class and has retained counsel competent and experienced in complex class actions. Plaintiff has no interest antagonistic to those of the Class, and Defendants have no defenses unique to Plaintiff.

32. Policies Generally Applicable to the Class: This class action is appropriate for certification because Defendants have acted or refused to act on grounds generally applicable to the Class as a whole, thereby requiring the Court's imposition of uniform relief to ensure compatible standards of conduct toward the members of the Class, and making final injunctive relief appropriate with respect to the Class as a whole. Defendants' practices challenged herein apply to and affect the members of the Class uniformly, and Plaintiff's challenge of those practices hinges on Defendants' conduct with respect to the Class as a whole, not on facts or law applicable only to Plaintiff.

33. Superiority: This case is also appropriate for class certification because class proceedings are superior to all other available methods for the fair and efficient adjudication of this controversy given that joinder of all parties is impracticable. The damages suffered by the individual members of the Class will likely be relatively small, especially given the burden and expense of individual prosecution of the complex litigation necessitated by Defendants' actions.

Thus, it would be virtually impossible for the individual members of the Class to obtain effective relief from Defendants' misconduct. Even if members of the Class could sustain such individual litigation, it would still not be preferable to a class action, because individual litigation would increase the delay and expense to all parties due to the complex legal and factual controversies presented in this case. By contrast, a class action presents far fewer management difficulties and provides the benefits of single adjudication, economy of scale, and comprehensive supervision by a single court. Economies of time, effort, and expense will be fostered and uniformity of decisions ensured.

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

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

35. The TCPA makes it unlawful for any person to “use any telephone facsimile machine, computer or other device to send, to a telephone facsimile machine, an unsolicited advertisement. . . .” 47 U.S.C. § 227(b)(1)(C).

36. The TCPA defines “unsolicited advertisement” as “any material advertising the commercial availability or quality of any property, goods, or services which is transmitted to any person without that person’s prior express invitation or permission, in writing or otherwise.” 47 U.S.C. § 227(a)(5).

37. The faxes sent by Defendants advertised the commercial availability and quality of its goods and services and were commercial in nature. Therefore, Defendants’ faxes are advertisements under the TCPA.

38. Defendants sent the facsimile advertisements at issue to Plaintiff and members of the Class without their prior express invitation or consent, and despite the lack of any prior business

relationship between them and members of the Class.

39. By sending the unsolicited advertisement faxes at issue to Plaintiff and members of the No Consent Class without their prior express consent, Defendants violated 47 U.S.C. § 227(b)(1)(C).

40. As a result of Defendants' conduct, Plaintiff and the members of the Class suffered actual damages, including the conversion or loss of paper and toner consumed in the printing of the faxes, the loss of use of the recipients' fax machines during the time required to receive, review and route the unauthorized faxes, as well as increased labor expenses.

41. Plaintiff and the Class are therefore entitled to a minimum of \$500 in damages for each violation under 47 U.S.C. § 227(b)(3)(B). To the extent Defendants' misconduct is determined to be willful, the Court should treble the amount of statutory damages.

42. Additionally, as a result of Defendants' unlawful conduct, Plaintiff and the other members of the Class are entitled to an injunction under 47 U.S.C. § 227(b)(3)(A), to ensure that Defendants' violations of the TCPA do not continue into the future.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff LC Technology, on behalf of itself and the Class, prays for the following relief:

- A. An order certifying this case as a class action on behalf of the Class as defined above; appointing LC Technology as the representative of the Class; and appointing its attorneys as Class Counsel;
- B. An order declaring that Defendants' actions, as set out above, violate the TCPA;
- C. An order declaring that Defendants' faxes constitute unsolicited

advertisements, that they lacked the required opt-out language, and that Defendants sent the faxes without first obtaining prior express invitation, permission, or consent of the recipients, and enjoining Defendants from further violations, and otherwise protecting the interests of the Class;

- D. An award of actual and/or statutory damages;
- E. An award of pre-judgement interest and costs; and
- F. Such further and other relief the Court deems reasonable and just.

JURY DEMAND

Plaintiff requests a jury trial.

Respectfully Submitted,

LC TECHNOLOGY INTERNATIONAL, INC.,
individually and on behalf of all others similarly situated,

Dated: July 5, 2018

By: /s/ Avi Kaufman

Avi R. Kaufman (FL Bar No. 84382)
kaufman@kaufmanpa.com
Kaufman P.A.
400 NW 26th Street
Miami, FL 33127
Telephone: (305) 469-5881

Stefan Coleman (FL Bar No. 30188)
law@stefancoleman.com
Law Offices of Stefan Coleman, P.A.
201 S. Biscayne Blvd, 28th Floor
Miami, FL 33131
Telephone: (877) 333-9427
Facsimile: (888)498-8946

JS 44 (Rev. 06/17)

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

LC TECHNOLOGY INTERNATIONAL, INC., individually and on behalf of all others similarly situated

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

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

Avi R. Kaufman, Kaufman P.A., 400 NW 26th Street, Miami, FL, 33127; (305) 469-5881

DEFENDANTS

HARVARD RISK MANAGEMENT CORPORATION, and PRE-PAID LEGAL SERVICES, INC. D/B/A LEGALSHIELD

County of Residence of First Listed Defendant Dallas County, TX
(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)

Click here for: Nature of Suit Code Descriptions.

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"/> 835 Patent - Abbreviated New Drug Application <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 type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" 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):

47 U.S.C. § 227

Brief description of cause:

Violation of the Telephone Consumer Protection Act

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

(See instructions):

JUDGE

DOCKET NUMBER

DATE

July 5, 2018

SIGNATURE OF ATTORNEY OF RECORD

s/ Avi Kaufman

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Harvard Risk Management, Pre-Paid Legal Services Send Junk Faxes as Part of 'Pyramid Scheme.' Class Action Claims](#)
