

UNITED STATES OF AMERICA  
U.S. DISTRICT COURT -- EASTERN DISTRICT OF MICHIGAN

JOSEPH LEAHY  
and THOMAS ROSS  
on behalf of a class,

Plaintiffs,

-v-

MEYER NJUS TANICK, PA,

Defendant.

**COMPLAINT – CLASS ACTION & JURY DEMAND**

There are no related cases, except the state court lawsuits referenced herein.

**Introduction**

1. Joseph Leahy and Thomas Ross seek redress for acts prohibited by the Fair Debt Collection Practices Act, 15 U.S.C. §1692 *et seq.* (“FDCPA”), committed by Meyer Njus Tanick, PA (“MNT”).
2. The FDCPA prohibits unfair or unconscionable collection methods, conduct which harasses or abuses any debtor, and any false, deceptive or misleading statements in connection with the collection of a debt. It also requires debt collectors to give debtors certain information. 15 U.S.C. §§1692d, 1692e, 1692f and 1692g.
3. In enacting the FDCPA, Congress found that: “[t]here is abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many debt collectors. Abusive debt collection practices contribute to the number of personal bankruptcies, to marital instability, to the loss of jobs, and to invasions of individual privacy.” 15 U.S.C. §1692(a).
4. Because of this, courts have held that “the FDCPA's legislative intent emphasizes the need to construe the statute broadly, so that we may protect consumers against debt collectors' harassing conduct.” and that “[t]his intent

cannot be underestimated.” *Ramirez v. Apex Financial Management LLC*, 567 F.Supp.2d 1035, 1042 (N.D.Ill. 2008).

5. The FDCPA encourages consumers to act as "private attorneys general" to enforce the public policies and protect the civil rights expressed therein. *Crabill v. Trans Union, LLC*, 259 F.3d 662, 666 (7th Cir. 2001).
6. Plaintiffs seek to enforce those policies and civil rights which are expressed through the FDCPA, 15 U.S.C. §1692 *et seq.*

### **Jurisdiction and Venue**

7. This court has jurisdiction under 15 U.S.C. §1692k(d) and 28 U.S.C. §§1331 and 1337.
8. The events described in this complaint occurred in this District.

### **Parties**

9. Plaintiff Joseph Leahy resided in South Lyon, Michigan at all relevant times.
10. Plaintiff Thomas Ross resided in Detroit, Michigan at all relevant times.
11. Defendant Meyer Njus Tanick, PA ("MNT"), formerly Meyer & Njus, is a 13-attorney law firm organized as a Minnesota corporation with principal offices at 200 S. 6th Street, Minneapolis, MN 55402 and other offices at (a) 33 North Dearborn Street, Suite 1301, Chicago, Illinois 60602, (b) 5232 West Oklahoma Avenue, Suite 200, Milwaukee, Wisconsin 53219, and (c) 21415 Civic Center Drive, Suite 301, Southfield, Michigan 48076
12. One of the principal practice areas of MNT is "collections."
13. MNT has a web site where it states: "Meyer Njus Tanick combines the best elements of a collection agency – heavy phone activity, skip tracing and asset locating – with the power of a law firm. With more than 80 years of combined experience in collections, we understand the issues that are important to you – efficient and cost-effective recovery on past-due

accounts. That means we use the tried and true methods of telephone and letter collections. The advantage of using a law firm for this method of recovery is that it makes it less likely will need to use the legal tools to enforce and collect judgments. Our experience demonstrates that debtors respond more quickly to collection efforts conducted by law firms. [¶] Under the leadership of firm co-founder and CEO, James Njus, the firm has grown to more than 45 staff members. Our presence is found throughout Minnesota, Michigan, Illinois, Iowa, Wisconsin, and Indiana and we have access to a nationwide network of attorneys who provide our clients with thorough, complete and comprehensive representation. . . . [¶] As a law firm, Meyer Njus Tanick has the unique ability to produce pre-litigation recoveries, similar to a collection agency, and we can supplement those efforts with time and effective judicial enforcement. Our experience means we know when to access the court system and when not to access the court system. We understand that every day matters when measuring how well your accounts receivable are managed. Getting rid of an extra layer speeds up the process. Over time, you can count on better metrics. . . . [¶] Our state-of-the-art collections system combined with our experience allows us greater management and control over the collection process, payment collection and remittance, client management, and reporting to you. [¶] Meyer Njus Tanick has more than 80 years of combined experience in legal collections. We maintain an experienced collections staff that is well trained and consistently monitored. [¶] With offices in Minnesota, Michigan, Illinois and Wisconsin, we offer a nationwide footprint by serving as the central source for referrals to other attorneys across the country. Our clients use our firm for nationwide collections and litigation."

(<https://meyernjus.com/collections/consumer-commercial-creditors/>)

14. Most of the debts collected, including plaintiffs' alleged debts, are for personal, family or household purposes and not for business purposes.
15. MNT uses the mails and telephone system in conducting such activities.
16. MNT is a debt collector as defined in the FDCPA.

**Facts**

17. On or about June 23, 2017, MNT, as counsel, filed a lawsuit on behalf of Synchrony Bank against Joseph Leahy in Michigan state court. A copy of the summons and complaint (a combined document) is attached as Appendix A.
18. On or about December 12, 2017, MNT, as counsel, filed a lawsuit on behalf of Synchrony Bank against Thomas Ross in Michigan state court. A copy of the summons and complaint (a combined document) is attached as Appendix B.
19. Each suit seeks collection of an alleged debt that was incurred (if at all) for personal, family or household purposes and not for business purposes.
20. The summons and complaint in Appendix A listed as defendants (a) Joseph Leahy, with his address, and (b) his address, again. Immediately after the address are the words "jointly and severally", which according to the dictionary means that "two or more persons are fully responsible equally for the liability", indicating that both the named individual and the address are sought to be held liable.
21. The text of the complaint refers to "Defendant(s)," which is consistent with there being more than one defendant.
22. Appendix A implies that in addition to Mr. Leahy, personally, the property identified in the summons and complaint is a defendant and that the summons and complaint seek a judgment against the property.
23. The summons and complaint in Appendix B are similar.

24. Such statements are false.
25. Such statements are not required by state law or rules.
26. Such statements are materially misleading and intimidating to an unsophisticated consumer.
27. The unsophisticated consumer is not familiar with the law relating to the enforcement of claims against property, and may not understand that before property can be affected by a claim based on a credit card or similar debt, a judgment must be entered against the individual consumer and subsequent proceedings taken to enforce the judgment against property.
28. Some federal and state lawsuits, such as federal forfeiture actions and Michigan state tax foreclosure actions, are legitimately brought against property.
29. Knowing when it is proper to name property requires a degree of legal knowledge not possessed by the unsophisticated consumer.
30. 15 U.S.C. §§1692e, 1692e(2), and 1692e(10) prohibit false or misleading representations in the course of debt collection, including a “false representation of... the character, amount, or legal status of any debt,” or “any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.”

**COUNT ONE – FDCPA – CLASS CLAIM**

31. Plaintiff incorporates paragraphs 1-30.
32. Because defendant made false representations in the course of debt collection lawsuits they brought against plaintiffs (as alleged in this complaint), defendant violated the FDCPA.
33. Plaintiffs were confused and concerned about the naming of property.

**Class Allegations**

34. Plaintiffs bring this action on behalf of a class under Fed.R.Civ.P. 23(a) and

(b)(3).

35. The class includes (a) all individuals (b) against whom MNT filed a collection lawsuit in Michigan, (c) where the address of the defendant was listed twice, as in Appendices A and B, with "jointly and severally" after the second listing, (d) where the suit was brought at any time between a date one year prior to the filing of this action and a date 21 days after the filing of this action.
36. Based on the number of court filings by MNT in Michigan, the members of the class are so numerous that joinder of all is not practicable. On information and belief, there are at least 40 individuals in the defined class.
37. There are questions of law and fact common to the class members, which predominate over any questions relating to individual class members. The predominant common question is whether the listing of the defendant's address in the manner complained of herein violates the FDCPA.
38. Plaintiffs' claim is typical of the claims of the class members, as it is based on the same facts and legal theories.
39. Plaintiffs will fairly and adequately represent the class members, and has retained counsel experienced in class actions and FDCPA litigation.
40. A class action is superior for the fair and efficient adjudication of this matter, because (A) individual actions are not economically feasible, (B) members of the class are likely to be unaware of their rights, and (C) Congress intended class actions to be the principal enforcement mechanism under the FDCPA.

#### **Demand For Judgment**

ACCORDINGLY, plaintiff respectfully requests that the Court:

- a. Assume jurisdiction over all claims,
- b. Award statutory damages,

- c. Award statutory costs and attorney fees, and
- e. Provide all other proper relief.

**Demand for Jury Trial**

Plaintiff respectfully demands trial by jury.

Respectfully submitted,

ADAM G. TAUB & ASSOCIATES  
CONSUMER LAW GROUP, PLC

By: s/ Adam G. Taub  
Adam G. Taub (P48703)  
17200 West 10 Mile Rd. Suite 200  
Southfield, MI 48075  
(248) 746-3790  
[adamgtaub@clgplc.net](mailto:adamgtaub@clgplc.net)

s/ Daniel A. Edelman  
Daniel A. Edelman  
Cathleen M. Combs  
EDELMAN, COMBS, LATTURNER  
& GOODWIN, LLC  
20 S. Clark Street, Suite 1500  
Chicago, Illinois 60603  
(312) 739-4200  
Email: [courtecl@edcombs.com](mailto:courtecl@edcombs.com)

Dated: March 23, 2018

# APPENDIX A

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Approved, SCAO

STATE OF MICHIGAN JUDICIAL DISTRICT JUDICIAL CIRCUIT 52/1 COUNTY PROBATE	SUMMONS AND COMPLAINT	CASE NO.  17 CO1872 GC
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Court address 48150 Grand River Ave., Novi MI 48374	SECOND	Court telephone no. (248) 305-6080
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Plaintiff's name(s), address(es), and telephone no(s).  
Synchrony Bank

Defendant's name(s), address(es), and telephone no(s).  
Joseph Leahy  
23940 Meadowcreek Cir E  
South Lyon, MI 48178-1936

**This case assigned to  
JUDGE ROBERT B. BUDY**

Plaintiff's attorney, bar no., address, and telephone no.  
Kara L. Harms, P72957  
MEYER & KJUS, P.A.  
200 South Sixth Street, Suite 1100  
Minneapolis, MN 55402  
(800) 570-0570

23940 Meadowcreek Cir E  
South Lyon, MI 48178-1936  
(Jointly and Severally)

**SUMMONS: NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

- You are being sued.
- YOU HAVE 21 DAYS** after receiving this summons to file a written answer with the court and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state). (MCR 2.111(C))
- If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.

Issued 6-27-2017	This summons expires 9-26-2017	Court clerk Alexandra Black
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\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

**COMPLAINT:** Instruction: The following is information that is required to be in the caption of every complaint and is to be completed by the plaintiff: Actual allegations and the claim for relief must be stated on additional complaint pages and attached to this form.

This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.

**Family Division Cases**

There is no other pending or resolved action within the jurisdiction of the family division of circuit court involving the family or family members of the parties.

An action within the jurisdiction of the family division of the circuit court involving the family or family members of the parties has been previously filed in \_\_\_\_\_ Court.

The action  remains  is no longer pending. The docket number and the judge assigned to the action are:

cket no.	Judge	Bar no.
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**General Civil Cases**

There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.

A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in \_\_\_\_\_ Court.

The action  remains  is no longer pending. The docket number and the judge assigned to the action are:

Docket no.	Judge	Bar no.
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AS ABOVE	AS ABOVE
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Plaintiff(s) residence (include city, township, or village)	Defendant(s) residence (include city, township, or village)
	South Lyon
Place where action arose or business conducted	

Date June 20, 2017 Cdr File No. 201817508

Signature of attorney/plaintiff *Kara L. Harms*

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

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<b>STATE OF MICHIGAN</b> JUDICIAL DISTRICT 52/1 JUDICIAL CIRCUIT	<b>SUMMONS AND COMPLAINT</b> Page 2 of 2 Pages	<b>CASE NO.</b>  GC
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Court address: 48150 Grand River Ave., Novi MI 48374  
 Joseph Leahy

Court telephone no.: (248) 305-6060

COMPLAINT

1. Synchrony Bank is the issuing bank and holder of the credit card(s) issued to Defendant(s), account(s) Synchrony Fin Sport \*\*\*\*\*4149, pursuant to (an) open-ended credit account agreement(s) which has/have been delivered to and is/are in the possession of Defendant(s). On June 2, 2014, GE Capital Retail Bank changed its name to Synchrony Bank.
2. Defendant(s) used said account(s) to purchase goods and/or services and was/were billed on a monthly basis by Plaintiff.
3. Defendant(s) has/have failed, refused and/or neglected to pay the full monthly payment when due and is/are therefore in default.
4. The amount due Plaintiff over and above all legal counterclaims and setoffs is \$5,243.22, all of which more fully appears in the account billing statement attached hereto as Exhibit A and by this reference made a part hereof.

FOR THESE REASONS Plaintiff requests judgment against Defendant (s, jointly and severally) for \$5,243.22, together with costs and reasonable attorney's fees.

MEYER & NJUS, P.A.

*Kara L. Harms*  
 Kara L. Harms, P72957

DUE FILE NO: 201617608

RECEIVED  
 DISTRICT CLERK  
 MAR 29 2018

THIS COMMUNICATION IS FROM A DEBT COLLECTOR

SPORT/SYNCHRONY BANK

Cardholder Name: JOSEPH P LEAHY  
 Account Number: [REDACTED] 4149  
 Statement Closing Date: 10/16/2016

Summary of Account Activity		Payment Information	
Previous Balance	\$5,206.22	New Balance	\$0.00
+ New Purchases	\$0.00	Total Minimum Payment Due	\$1,557.00
- Payments	\$0.00	Payment Due Date	10/18/2016
+/- Credits, Fees & Adjustments (net)	\$5,206.22	<b>PAYMENT DUE BY 5 P.M. EASTERN ON THE DUE DATE.</b>	
+/- Interest Charge (net)	\$0.00	We may convert your payment into an electronic debit. See reverse side.	
New Balance	\$0.00	Late Payment Warning: If we do not receive your Total Minimum Payment Due by the Payment Due Date listed above, you may have to pay a late fee up to \$37.00.	
Credit Limit	\$5,500.00		
Available Credit	\$0.00		
Days in Billing Period	3D		
Pay online for free at: <a href="http://mysynchrony.com">mysynchrony.com</a>			
For Synchrony Bank customer service or to report your card lost or stolen, call 1-866-398-8254.			
Best times to call are Wednesday - Friday.			

Transaction Summary				
Tran Date	Post Date	Reference Number	Description	Amount
10/18/2016	10/16/2016	F907900MJ00999990	CHARGE OFF ACCOUNT-PRINCIPALS	\$3,629.00 CR
10/16/2016	10/16/2016	F907900MJ00999990	CHARGE OFF ACCOUNT-INTEREST CHARGE	\$1,814.22 CR
<b>FEES</b>				
10/10/2016	10/10/2016		LATE FEE	\$37.00
<b>TOTAL FEES FOR THIS PERIOD</b>				<b>\$37.00</b>
<b>INTEREST CHARGED</b>				
10/16/2016	10/16/2016		INTEREST CHARGE ON PURCHASES	\$0.00
<b>TOTAL INTEREST FOR THIS PERIOD</b>				<b>\$0.00</b>
<b>2016 Totals Year-to-Date</b>				
Total Fees Charged in 2016				\$259.00
Total Interest Charged in 2016				\$1,635.22
Total Interest Paid in 2016				\$284.00

Interest Charge Calculation				
Type of Balance	Expiration Date	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
Purchases	NA	29.99%	\$0.00	\$0.00

**Cardholder News & Information**  
 Statement not provided to customer.

\* NOTICE: See reverse side and additional pages (if any) for important information concerning your account.

5302 CXH 3 3 15 161016 8 D PAGE 1 of 1 9079 2600 GNJ2 01CS5302

Pay online at [mysynchrony.com](http://mysynchrony.com) or enclose this coupon with your check. Please use blue or black ink.

Total Minimum Payment Due	Past Due Amount	Payment Due Date	New Balance	Account Number
\$1,557.00	\$0.00	10/18/2016	\$0.00	[REDACTED] 4149

Payment Enclosed: \$

New address or e-mail? Check the box at left and print changes on back. Payment due includes \$ 0.00 past due. Please pay the past due amount PROMPTLY.

JOSEPH P LEAHY  
 23940 MEADOWCREEK CIR E  
 SOUTH LYON MI 48178-1936

Make Payment to: SYNCHRONY BANK  
 PO BOX 960081  
 ORLANDO, FL 32896-0061

# **APPENDIX B**

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Approved - SCAO <b>STATE OF MICHIGAN</b> JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE	Original - Court 1st copy - Defendant <b>SUMMONS AND COMPLAINT</b>	2nd copy - Plaintiff 3rd copy - Return <b>CASE NO.</b> 17131150 JUDGE P. JEFFERSON
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Court address 21 Madison Detroit MI 48226	Court telephone no. (313) 965-6098
--	---------------------------------------

Plaintiff's name(s), address(es), and telephone no(s)

**Superior Bank**

Defendant's name(s), address(es), and telephone no(s)

Thomas Ross  
 7431 Stout St  
 Detroit, MI 48228-4634

Plaintiff's attorney, bar no., address, and telephone no.

Kara J. Mann, #12357  
 MEYER & MIUS, P.A.  
 200 South Sixth Street, Suite 1100  
 Minneapolis, MI 48102  
 (303) 578-0570

Defendant's attorney, bar no., address, and telephone no.

7431 Stout St  
 Detroit, MI 48228-4634  
 (Jointly and Severally)

**SUMMONS - NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified

- You are being sued.
- YOU HAVE 21 DAYS** after receiving this summons to file a written answer with the court and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state)
- If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.

Issued	This summons expires	Court clerk
		ISSUED 12/12/17 EXPIRES 03/13/18 T. Jackson Davis

**Family Division Cases** (The following is information required in the caption of every complaint and is to be completed by the plaintiff.)

This case involves a minor who is under the continuing jurisdiction of another Michigan court. The name of the court, file number, and details are on page \_\_\_\_\_ of the attached complaint.

There is no other pending or resolved action within the jurisdiction of the family division of circuit court involving the family or family members of the parties.

An action within the jurisdiction of the family division of the circuit court involving the family or family members of the parties has been previously filed in \_\_\_\_\_ Court.

The action  remains  is no longer pending. The docket number and the judge assigned to the action are:

Docket no.	Judge	Bar no.

**Civil Cases** (The following is information required in the caption of every complaint and is to be completed by the plaintiff.)

This is a business case in which all or part of the action includes a business or commercial dispute under MGL 600.8035

There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.

A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in \_\_\_\_\_ Court.

The action  remains  is no longer pending. The docket number and the judge assigned to the action are:

Docket no.	Judge	Bar no.

**VENUE**

Plaintiff's residence (include city, township, or village) AS ABOVE	Defendant's residence (include city, township, or village) AS ABOVE
Place where action arose or business conducted Detroit	

Date: 03/23/18 Out File No. 201814602

Signature of attorney/plaintiff: *Kara J. Mann*

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STATE OF MICHIGAN  
JUDICIAL DISTRICT  
35th JUDICIAL CIRCUIT

SUMMONS AND COMPLAINT  
Page 2 of 2 Pages

CASE NO.

Court address

421 Madison, Detroit MI 48226  
Thomas Ross

Court telephone no.

(313) 965-6000

COMPLAINT

1. Synchrony Bank is the issuing bank and holder of the credit card(s) issued to Defendant(s), account(s) Walmart Credit Card #1234 56789, pursuant to (an) open-ended credit account agreement(s) which has/have been delivered to and is/are in the possession of Defendant(s). On June 2, 2014, GE Capital Retail Bank changed its name to Synchrony Bank.
2. Defendant(s) used said account(s) to purchase goods and/or services and was/were billed on a monthly basis by Plaintiff.
3. Defendant(s) has/have failed, refused and/or neglected to pay the full monthly payment when due and is/are therefore in default.
4. The amount due Plaintiff over and above all legal counterclaims and setoffs is \$2,093.50, all of which more fully appears in the account billing statement attached hereto as Exhibit A and by this reference made a part hereof.

FOR THESE REASONS Plaintiff requests judgment against Defendant(s) jointly and severally for \$2,093.50, together with costs and reasonable attorney's fees.

MEYER & NJUS, P.A.

*Carol Harms*  
Carol Harms, P72957

Our File No: 201714668

THIS COMMUNICATION IS FROM A DEBT COLLECTOR

**Walmart®  
Credit Card**

THOMAS V ROSS  
Account Number: ██████████ 2748

Visit us at [walmart.com/credit](http://walmart.com/credit)  
Customer Service: 1-800-941-4528

**Summary of Account Activity**

Previous Balance	\$2,055.60
+ Other Credits	\$2,063.50
+ Fees Charged	\$38.00
<b>New Balance</b>	<b>\$0.00</b>
Credit Limit	\$1,400
Available Credit	\$0.00
Cash Advance/Quick Cash Limit	\$320
Available Cash	\$0.00
Statement Closing Date	07/16/2017
Days in Billing Cycle	30

**Payment Information**

New Balance	\$0.00
Amount Paid Due	\$0.00
<b>Total Minimum Payment Due</b>	<b>\$656.00</b>
Payment Due Date	07/18/2017

Late Payment Warning: If we do not receive your Total Minimum Payment Due by the Payment Due Date listed above, you may have to pay a late fee up to \$38.00.

**3-2-1 Save Rewards Summary**

Earned this Statement

3% Earned on Walmart.com	\$0.00
2% Earned on Fuel*	\$0.00
1% Earned on Other Purchases	\$0.00
<b>Total Earned this Statement</b>	<b>\$0.00</b>
Redeemed this Statement	\$0.00

\*Walmart and Murphy USA stations only

**Rewards News**

Earn rewards on everyday purchases with your Walmart Credit Card

**Transaction Summary**

Tran Date	Post Date	Reference Number	Description of Transaction or Credit	Plan Type	Amount
07/18	07/18	FB112008500999890	CHARGE OFF ACCOUNT PRINCIPALS		(\$1,863.78)
07/18	07/18	FB112008500999890	CHARGE OFF ACCOUNT INTEREST		(\$589.72)
07/10	07/10		FEES LATE FEE		\$38.00
			TOTAL FEES FOR THIS PERIOD		\$38.00
07/18	07/18		INTEREST CHARGED		\$0.00
07/18	07/18		INTEREST CHARGE ON PURCHASES		\$0.00
			INTEREST CHARGE ON CASH ADVANCES		\$0.00

(Continued on next page)

**PAYMENT DUE BY 5 P.M. (ET) ON THE DUE DATE**  
NOTICE: We may convert your payment into an electronic debit. See reverse for details, Billing Rights and other important information.

404 WBS 1 2 13 170716 4 PAGE 1 of 3 9132 3600 0318 01EAL404  
Detach and mail this portion with your check. Do not include any correspondence with your check.



Account Number: ██████████ 2748

Total Minimum Payment Due	Amount Paid Due	Payment Due Date	Over/Min Amount	New Balance
\$656.00	\$0.00	07/18/2017	\$0.00	\$0.00

Payment Enclosed: \$         
Please use blue or black ink.



New address or email? Print changes on back.

THOMAS V ROSS  
7431 STOUT ST  
DETROIT MI 48226-4834

Make Payment To: WALMART'S SYNCHRONY BANK  
P.O. BOX 530927  
ATLANTA, GA 30353-0927

# ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Meyer Njus Tanick Sued Over 'Misleading and Intimidating' Debt Collection Practices](#)

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