

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

DUANE LINDENBACH, LINDA LOPEZ and  
MARLENE KANEHL Individually and on Behalf  
of All Others Similarly Situated,

Plaintiffs,

vs.

THE CBE GROUP, INC.,

Defendant.

---

Case No.: 17-cv-1336

**CLASS ACTION COMPLAINT**

**Jury Trial Demanded**

**INTRODUCTION**

1. This class action seeks redress for collection practices that violate the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* (the “FDCPA”).

**JURISDICTION AND VENUE**

2. The court has jurisdiction to grant the relief sought by the Plaintiff pursuant to 15 U.S.C. § 1692k and 28 U.S.C. §§ 1331 and 1337. Venue in this District is proper in that Defendant directed its collection efforts into the District.

**PARTIES**

3. Plaintiff Duane Lindenbach is an individual who resides in the Eastern District of Wisconsin (Milwaukee County).

4. Plaintiff Linda Lopez is an individual who resides in the Eastern District of Wisconsin (Milwaukee County).

5. Plaintiff Marlene Kanehl is an individual who resides in the Eastern District of Wisconsin (Milwaukee County).

6. Each Plaintiff is a “consumer” as defined in the FDCPA, 15 U.S.C. § 1692a(3), in that Defendant sought to collect from them a debt allegedly incurred for personal, family or household purposes.

7. Defendant The CBE Group, Inc. (“CBE”) is a foreign corporation with its principal place of business located at 1309 Technology Parkway Cedar Falls, IA 50613.

8. CBE is engaged in the business of a collection agency, using the mails and telephone to collect consumer debts originally owed to others.

9. CBE is engaged in the business of collecting debts owed to others and incurred for personal, family or household purposes. CBE is a debt collector as defined in 15 U.S.C. § 1692a.

### **FACTS**

#### **THE FAIR DEBT COLLECTION PRACTICES ACT, 15 U.S.C. § 1692 ET SEQ.**

10. The FDCPA states that its purpose, in part, is “to eliminate abusive debt collection practices by debt collectors.” 15 U.S.C. § 1692(e). It is designed to protect consumers from unscrupulous collectors, whether or not there is a valid debt. *Mace v. Van Ru Credit Corp.*, 109 F.3d 338 (7th Cir. 1997); *Baker v. G.C. Services Corp.*, 677 F.2d 775, 777 (9th Cir. 1982); *McCartney v. First City Bank*, 970 F.2d 45, 47 (5th Cir. 1992). The FDCPA broadly prohibits unfair or unconscionable collection methods; conduct which harasses, oppresses 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.

11. The Seventh Circuit has held that whether a debt collector’s conduct violates the FDCPA should be judged from the standpoint of an “unsophisticated consumer.” *Avila v. Rubin*, 84 F.3d 222, 227 (7th Cir. 1996); *Gammon v. GC Services, LP*, 27 F.3d 1254, 1257 (7th Cir. 1994). The standard is an objective one—whether the plaintiffs or any class members were misled is not an element of a cause of action. *Bartlett v. Heibl*, 128 F.3d 497, 499 (7th Cir.

1997). “The question is not whether these plaintiffs were deceived or misled, but rather whether an unsophisticated consumer would have been misled.” *Beattie v. D.M. Collections Inc.*, 754 F. Supp. 383, 392 (D. Del. 1991).

12. Because it is part of the Consumer Credit Protection Act, 15 U.S.C. §§ 1601 *et seq.*, the FDCPA should be liberally construed in favor of the consumer to effectuate its purposes. *Cirkot v. Diversified Fin. Services, Inc.*, 839 F. Supp. 941, 944 (D. Conn. 1993).

The [Consumer Credit Protection] Act is remedial in nature, designed to remedy what Congressional hearings revealed to be unscrupulous and predatory creditor practices throughout the nation. Since the statute is remedial in nature, its terms must be construed in liberal fashion if the underlying Congressional purpose is to be effectuated.

*N.C. Freed Co. v. Board of Governors*, 473 F.2d 1210, 1214 (2d Cir. 1973).

13. Statutory damages are recoverable for violations, whether or not the consumer proves actual damages. *Baker*, 677 F.2d at 780-1; *Woolfolk v. Van Ru Credit Corp.*, 783 F. Supp. 724, 727 and n. 3 (D. Conn. 1990); *Riveria v. MAB Collections, Inc.*, 682 F. Supp. 174, 177 (W.D.N.Y. 1988); *Kuhn v. Account Control Tech.*, 865 F. Supp. 1443, 1450 (D. Nev. 1994); *In re Scrimpsheer*, 17 B.R. 999, 1016-7 (Bankr. N.D.N.Y. 1982); *In re Littles*, 90 B.R. 669, 680 (Bankr. E.D. Pa. 1988), *aff'd as modified sub nom. Crossley v. Lieberman*, 90 B.R. 682 (E.D. Pa. 1988), *aff'd*, 868 F.2d 566 (3d Cir. 1989).

14. The FDCPA creates substantive rights for consumers; violations cause injury to consumers, and such injuries are concrete and particularized. *Bock v. Pressler & Pressler, LLP*, No. 11-7593, 2017 U.S. Dist. LEXIS 81058 \*21 (D.N.J. May 25, 2017) (“through [s]ection 1692e of the FDCPA, Congress established ‘an enforceable right to truthful information concerning’ debt collection practices, a decision that ‘was undoubtedly influenced by congressional awareness that the intentional provision of misinformation’ related to such practices, ‘contribute[s] to the number of personal bankruptcies, to marital instability, to the loss

of jobs, and to invasions of individual privacy,"); *Quinn v. Specialized Loan Servicing, LLC*, No. 16 C 2021, 2016 U.S. Dist. LEXIS 107299 \*8-13 (N.D. Ill. Aug. 11, 2016) (rejecting challenge to Plaintiff's standing based upon alleged FDCPA statutory violation); *Lane v. Bayview Loan Servicing, LLC*, No. 15 C 10446, 2016 U.S. Dist. LEXIS 89258 \*9-10 (N.D. Ill. July 11, 2016) ("When a federal statute is violated, and especially when Congress has created a cause of action for its violation, by definition Congress has created a legally protected interest that it deems important enough for a lawsuit."); *Church v. Accretive Health, Inc.*, No. 15-15708, 2016 U.S. App. LEXIS 12414 \*7-11 (11th Cir. July 6, 2016) (same); *see also Mogg v. Jacobs*, No. 15-CV-1142-JPG-DGW, 2016 U.S. Dist. LEXIS 33229, 2016 WL 1029396, at \*5 (S.D. Ill. Mar. 15, 2016) ("Congress does have the power to enact statutes creating legal rights, the invasion of which creates standing, even though no injury would exist without the statute," (quoting *Sterk v. Redbox Automated Retail, LLC*, 770 F.3d 618, 623 (7th Cir. 2014))). For this reason, and to encourage consumers to bring FDCPA actions, Congress authorized an award of statutory damages for violations. 15 U.S.C. § 1692k(a).

15. Moreover, Congress has explicitly described the FDCPA as regulating "abusive practices" in debt collection. 15 U.S.C. §§ 1692(a) – 1692(e). Any person who receives a debt collection letter containing a violation of the FDCPA is a victim of abusive practices. *See* 15 U.S.C. §§ 1692(e) ("It is the purpose of this subchapter to eliminate abusive debt collection practices by debt collectors, to insure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged, and to promote consistent State action to protect consumers against debt collection abuses").

16. The FDCPA prohibits debt collectors from contacting third parties and disclosing the existence of a debt. 15 U.S.C. § 1692c(b) states:

Except as provided in section 1692b of this title, without the prior consent of the consumer given directly to the debt collector, or the express permission of a court of competent jurisdiction, or as reasonably necessary to effectuate a postjudgment judicial remedy, a debt collector may not communicate, in connection with the collection of any debt, with any person other than the consumer, his attorney, a consumer reporting agency if otherwise permitted by law, the creditor, the attorney of the creditor, or the attorney of the debt collector.

17. 15 U.S.C. § 1692b allows a debt collector to communicate with third parties for the purpose of determining the consumer’s location or employment. However, the debt collector must “not state that such consumer owes any debt.” 15 U.S.C. § 1692b(2).

18. The FDCPA prohibits “any false, deceptive, or misleading representation or means in connection with the collection of any debt.” 15 U.S.C. § 1692e.

19. 15 U.S.C. § 1692e(2)(a) specifically prohibits: “The false representation of — the character, amount, or legal status of any debt.”

20. 15 U.S.C. § 1692e(5) specifically prohibits: “The threat to take any action that cannot legally be taken or that is not intended to be taken.”

21. 15 U.S.C. § 1692e(10) specifically prohibits the “use of any false representation or deceptive means to collect or attempt to collect any debt.”

22. 15 U.S.C. § 1692f generally prohibits a debt collector from using “unfair or unconscionable means to collect or attempt to collect any debt.”

23. 15 U.S.C. § 1692f(1) specifically prohibits the “collection of any amount (including any interest, fee, charge, or expense incidental to the principal obligation) unless such amount is expressly authorized by the agreement creating the debt or permitted by law.”

24. 15 U.S.C. § 1692g(a) states:

a) **Notice of debt; contents**

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

(1) the amount of the debt

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

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

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

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

**Lindenbach Letter**

25. Plaintiff Duane Lindenbach entered into a consumer transaction with Wheaton Franciscan Healthcare ("WFH") for personal medical services. The alleged debt was thus incurred for personal, family or household purposes.

26. On or about October 12, 2016 CBE mailed a debt collection letter to Plaintiff regarding a debt, allegedly owed to WFH. A copy of this letter is attached to this complaint as Exhibit A.

27. Upon information and belief, Exhibit A is a form letter, generated by computer, and with the information specific to Plaintiff inserted by computer.

28. Upon information and belief, Exhibit A is a form debt collection letter used by CBE to attempt to collect alleged debts.

29. Upon information and belief, Exhibit A is the first written communication that CBE sent to Plaintiff regarding the alleged debt to which Exhibit A refers.

30. Exhibit A contains the following text:

Unless you notify this office within thirty (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 thirty (30) days after receiving this notice, that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within thirty (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. This is an attempt to collect a debt; any information obtained will be used for that purpose. This communication is from a debt collector.

31. The above language in Exhibit A is the debt validation notice that the FDCPA requires to be included with the initial written communication to the consumer. 15 U.S.C. § 1692g.

32. Exhibit A also contains the following statement:

---

You now have the opportunity to pay this account in full or we may report the debt to one or more of the three national credit bureaus after the fortieth (40th) day from the date of this letter.

33. Plaintiff, thus, has forty days from the date of Exhibit A to pay the allegedly overdue account or face being reported to the "three national credit bureaus." (Exhibit A).

34. If Exhibit A was actually mailed on October 12, 2016, the 30 day validation period identified in Exhibit A would end only a few days before Plaintiff's account would potentially be reported to the three national credit reporting bureaus if Plaintiff does not "pay this account in full" to CBE. *See* 15 U.S.C. § 1692g(a).

#### **Lopez Letters**

35. Plaintiff Linda Lopez entered into a number of consumer transactions with Wheaton Franciscan Healthcare ("WFH") for personal medical services. The alleged debts were thus incurred for personal, family or household purposes.



36. On or about October 28, 2016, CBE mailed four debt collection letters to Plaintiff regarding a debt, allegedly owed to WFH. Copies of these letters are attached to this complaint as Exhibits B-E.

37. On or about November 30, 2016, CBE mailed another debt collection letter to Plaintiff regarding an additional debt, allegedly owed to WFH. A copy of this letter is attached to this complaint as Exhibit F.

38. Upon information and belief, Exhibits B-F are form letters, generated by computer, and with the information specific to Plaintiff inserted by computer.

39. Upon information and belief, Exhibits B-F are form debt collection letters used by CBE to attempt to collect alleged debts.

40. Upon information and belief, Exhibits B-F are the first written communications that CBE sent to Plaintiff regarding the alleged debts to which Exhibits B-F refer.

41. Exhibits B-F contain the following text:

Unless you notify this office within thirty (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 thirty (30) days after receiving this notice, that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within thirty (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. This is an attempt to collect a debt; any information obtained will be used for that purpose. This communication is from a debt collector.

42. The above language in Exhibits B-F is the debt validation notice that the FDCPA requires to be included with the initial written communication to the consumer. 15 U.S.C. § 1692g.

43. Exhibits B-F also contain the following statement:

---

You now have the opportunity to pay this account in full or we may report the debt to one or more of the three national credit bureaus after the fortieth (40th) day from the date of this letter.

44. Plaintiff, thus, has forty days from the date of Exhibits B-F to pay the allegedly overdue account or face being reported to the "three national credit bureaus."



45. If Exhibits B-E were actually mailed on October 28, 2016, the 30 day validation period identified in Exhibits B-E would end only a few days before Plaintiff's account would be potentially be reported to the three national credit reporting bureaus if Plaintiff does not “pay this account in full” to CBE. *See* 15 U.S.C. § 1692g(a).

46. Likewise, if Exhibit F were actually mailed on November 30, 2016, the 30 day validation period identified in Exhibit F would end only a few days before Plaintiff's account would be potentially be reported to the three national credit reporting bureaus if Plaintiff does not “pay this account in full” to CBE. *See* 15 U.S.C. § 1692g(a).

47. Exhibits A-F are confusing to the unsophisticated consumer because the letter demands a payment within the validation period or shortly thereafter, but does not explain how the validation notice and payment “deadline” fit together. *Bartlett v. Heibl*, 128 F.3d 497, 500 (7th Cir. 1997) (“In the typical case, the letter both demands payment within thirty days and explains the consumer's right to demand verification within thirty days. These rights are not inconsistent, but by failing to explain how they fit together the letter confuses.”).

48. The consumer needs time to process the information contained in an initial debt collection letter before deciding whether to dispute, pay or take other action. This is the point of the 30 day period in 15 U.S.C. 1692g(a).

49. Prior to deciding whether to dispute a debt, a consumer may have to sort through personal records and/or memories to try to remember if the debt might be legitimate. She may not recognize the creditor – debts are freely assignable and corporations, especially banks, often change names.

50. Moreover, once a consumer sends a dispute in writing, the creditor is under no obligation to provide verification in any specific amount of time, or even to provide verification

at all, so long as the debt collector ceases collection efforts until it does so. *Jang v. A.M. Miller & Assocs.*, 122 F.3d 480, 483 (7th Cir. 1997) (“Section 1692g(b) thus gives debt collectors two options when they receive requests for validation. They may provide the requested validations and continue their debt collecting activities, or they may cease all collection activities.”)

51. The § 1692g validation period lasts for 30 days. It is the consumer’s right to *request* verification until the end of the thirty day period. If the request is not made until the end of the thirty day period, the verification request would not be processed, researched by the creditor, and returned to the consumer until long after the deadline to report the debt to CRAs unless the consumer “pay[s] the account in full” has expired.

52. The unsophisticated consumer would have no idea how to both seek verification of the debt and avoid being reported to the three national credit bureaus. It is likely that the forty day deadline to pay before reporting would expire before the debt collector provides verification. The consumer would be left with little or no time to review the verification and determine whether the debt is legitimate and actually theirs before paying CBE. Thus, the effect of the credit bureau reporting threat is to discourage or prevent consumers from exercising their validation rights.

53. The Seventh Circuit has established “safe harbor” language regarding apparent conflicts between validation rights and demands for payment in collection letters. *Bartlett*, 128 F.3d 497, 501-02 (7th Cir. 1997).

54. Defendant did not use the safe harbor language in Exhibits A-G, or any equivalent or similar language.

**Kanehl Letter**

55. Plaintiff Marlene Kanehl entered into one or more consumer transactions with Time Warner Cable ("TWC") for personal cable television services. The alleged debt was thus incurred for personal, family or household purposes.

56. On or about August 28, 2017, CBE mailed a debt collection letter to Plaintiff regarding an alleged debt, allegedly owed to TWC. A copy of this letter is attached to this complaint as Exhibit G.

57. Upon information and belief, Exhibit G is a form letter, generated by computer, and with the information specific to Plaintiff inserted by computer.

58. Upon information and belief, Exhibit G is a form debt collection letter used by PRA to attempt to collect alleged debts.

59. Exhibit G states:

**Total Amount Due: \$224.15**

60. Exhibit G also states that the "outstanding balance" of the account is "\$224.15."

61. Exhibit G then includes four payment "coupons" in the following form:

Po Box 2635  
Waterloo, IA 50704-2635

IF PAYING BY CREDIT/DEBIT FILL OUT BELOW

CARD NUMBER	EXP. DATE	SELECT CARD USING FOR PAYMENT
SIGNATURE	<input type="checkbox"/>	<input type="checkbox"/>
PAYMENT AMOUNT: PLEASE PAY THIS AMOUNT: \$56.04 PLEASE PAY BY: 12/11/17		
ACCT#: 5501	CS #: 9858	REF #: DATE: 08/28/17

CALL: (866)913-3133  
2167209868-1-136-29009239

0241 511365431

Marlene B Kanehl  
3872 S Lake Dr  
Unit 205  
Saint Francis WI 53235-5234

THE CBE GROUP, INC.  
Payment Processing Center  
PO Box 300  
Waterloo, IA 50704-0300

21 [REDACTED] 785800000135 0000000022415 082817 [REDACTED] 2

----- Please detach carefully and include this coupon with your payment -----

62. Each of the four payment coupons stated: “PLEASE PAY THIS AMOUNT: **\$56.04.**” (bold in original).

63. The total amount of four payments of \$56.04 exceeds the “Total Amount Due” of \$224.15.

64. Exhibit G misstates the amount CBE is collecting and attempts to collect amounts not owed to the creditor. 15 U.S.C. §§ 1692e(2)(a), 1692f(1).

65. Plaintiffs were confused by Exhibits A-G.

66. Plaintiffs had to spend time and money investigating Exhibits A-G and the consequences of any potential responses to Exhibits A-G.

67. Plaintiffs had to take time to obtain and meet with counsel, including travel to counsel’s office by car and its related expenses (including but not limited to the cost of gasoline and mileage), to advise Plaintiffs on the consequences of Exhibits A-G.

### **COUNT I – FDCPA**

68. Plaintiffs incorporate by reference as if fully set forth herein the allegations contained in the preceding paragraphs of this Complaint.

69. The statement on Exhibits A-F that Plaintiffs can avoid being reported to the three national credit bureaus only if Plaintiffs pay within ten days of the validation period ending conflicts with and overshadows the debt validation notice, in that it demands a payment within the validation period or shortly thereafter, but does not explain how the validation notice and settlement “deadline” fit together. 15 U.S.C. § 1692g; *Bartlett*, 128 F.3d at 500.

70. Exhibits A-F are confusing, deceptive, and/or misleading to the unsophisticated consumer.

71. 15 U.S.C. § 1692g(b) states, in part:

**(b) Disputed debts**

...

Any collection activities and communication during the 30-day period may not overshadow or be inconsistent with the disclosure of the consumer's right to dispute the debt or request the name and address of the original creditor.

72. 15 U.S.C. § 1692e provides, in relevant part: "A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt."

73. 15 U.S.C. § 1692e(10) prohibits: "The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.

74. Defendant violated 15 U.S.C. §§ 1692e, 1692e(10) and 1692g.

**COUNT II – FDCPA**

75. Plaintiffs incorporate by reference as if fully set forth herein the allegations contained in the preceding paragraphs of this Complaint.

76. Count II is brought on behalf of Plaintiff Kanehl.

77. The four payment coupons on Exhibit G collectively sought to collect an amount greater than the actual balance owed on Kanehl's TWC account.

78. Exhibit G misrepresented the amount of the debt and sought to collect amounts to which neither CBE nor TWC was entitled.

79. Defendant violated 15 U.S.C. §§ 1692e, 1692e(2)(a), 1692e(10), 1692f and 1692f(1).

**CLASS ALLEGATIONS**

80. Plaintiffs bring this action on behalf of two Classes.

81. Class 1 consists of (a) all natural persons in the State of Wisconsin (b) who were sent an initial debt collection letter in the form represented by Exhibits A-F to the complaint in

this action, (c) seeking to collect a debt incurred for personal, family or household purposes, (d) between September 29, 2016 and September 29, 2017, inclusive, (e) that was not returned by the postal service. Plaintiffs Lindenbach and Lopez are the designated representatives for Class 1.

82. Class 2 consists of (a) all natural persons in the State of Wisconsin (b) who were sent a debt collection letter in the form represented by Exhibit G to the complaint in this action, (c) in which the sum of the amounts on the payment coupons, designated as “PLEASE PAY THIS AMOUNT,” added up to greater than the “Total Amount Due” and/or “outstanding balance,” (d) seeking to collect a debt incurred for personal, family or household purposes, (e) between September 29, 2016 and September 29, 2017, inclusive, (f) that was not returned by the postal service. Plaintiff Kanehl is the designated representatives for Class 2.

83. The Class is so numerous that joinder is impracticable. On information and belief, there are more than 50 members of the Class.

84. There are questions of law and fact common to the members of the class, which common questions predominate over any questions that affect only individual class members. The predominant common question is whether the Defendant complied with 15 U.S.C. § 1692e, 1692e(2)(a), 1692e(10), 1692f, 1692f(1) and/or 1692g.

85. Plaintiffs’ claims are typical of the claims of the Class members. All are based on the same factual and legal theories.

86. Plaintiffs will fairly and adequately represent the interests of the Class members. Plaintiffs have retained counsel experienced in consumer credit and debt collection abuse cases.

87. A class action is superior to other alternative methods of adjudicating this dispute. Individual cases are not economically feasible.

**JURY DEMAND**

88. Plaintiffs hereby demand a trial by jury.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs request that the Court enter judgment in favor of Plaintiffs and the Class and against Defendant for:

- (a) actual damages;
- (b) statutory damages;
- (c) attorneys' fees, litigation expenses and costs of suit; and
- (d) such other or further relief as the Court deems proper.

Dated: September 29, 2017

**ADEMI & O'REILLY, LLP**

By: /s/ John D. Blythin  
Shpetim Ademi (SBN 1026973)  
John D. Blythin (SBN 1046105)  
Mark A. Eldridge (SBN 1089944)  
Jesse Fruchter (SBN 1097673)  
3620 East Layton Avenue  
Cudahy, WI 53110  
(414) 482-8000  
(414) 482-8001 (fax)  
sademi@ademilaw.com  
jblythin@ademilaw.com  
meldridge@ademilaw.com  
jfruchter@ademilaw.com



# **EXHIBIT A**



**TO ALL CONSUMERS – Notice about Electronic Check Conversion:** When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as the same day we receive your payment and you will not receive your check back from your financial institution. Also, you authorize us to represent a check as an electronic fund transfer from your account if your payment is returned unpaid.

**Please be aware of the following rights. This list does not contain a complete list of the rights consumers have under state and federal law.**

**California Residents:** The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or <http://www.ftc.gov/>.

Non-profit credit counseling services may be available in the area. State and federal law require debt collectors to treat you fairly and prohibit debt collectors from making false statements or threats of violence, using obscene or profane language, and making improper communications with third parties, including your employer.

As required by law, you are hereby notified that a negative credit agency report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations. We will not submit a negative credit report to a credit reporting agency about this credit obligation until the expiration of the time period described in the notice on the front of this letter.

**Colorado Residents:** The Colorado office of The CBE Group is located at 1776 S. Jackson Street, Suite 900, Denver, CO 80210, telephone (720)287-8648. FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE [WWW.COAG.GOV/CAR](http://WWW.COAG.GOV/CAR). A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt.

**Massachusetts Residents:** NOTICE OF IMPORTANT RIGHTS. You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked or delivered within seven days of such request. You may terminate this request by writing to the debt collector.

**Minnesota Residents:** This collection agency is licensed by the Minnesota Department of Commerce.

**Nevada Residents:** NOTE: If you pay or agree to pay all or any part of the debt referenced in this letter, your payment or agreement to pay may be construed as your acknowledgment of the debt and that you agree to waive any applicable statute of limitations. Seek legal advice if you have questions concerning your legal right or obligations relating to this debt.

**New York City Borough Residents:** Department of Consumer Affairs, City of New York, License # 1080974. Please contact Sabrina Lowery at the number listed on the front of this letter regarding this matter.

**North Carolina Residents:** North Carolina Department of Insurance Permit # 3568, North Carolina Department of Insurance Permit # 103066, North Carolina Department of Insurance Permit # 109072, North Carolina Department of Insurance Permit # 111791, North Carolina Department of Insurance Permit # 112794.

**Tennessee Residents:** This collection agency is licensed by the Collection Service Board, State Department of Commerce and Insurance.

**Utah Residents:** As required by Utah law, you are hereby notified that a negative credit report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

**Wisconsin Residents:** This collection agency is licensed by the Division of Banking in the Wisconsin Department of Financial Institutions, [www.wdfi.org](http://www.wdfi.org).

# Exhibit B



The CBE Group, Inc.  
 Corporate Address: 1309 Technology Pkwy, Cedar Falls, IA 50613  
 Hours of Operation: 8:00 a.m. - 6:00 p.m. CT Monday-Friday

10/28/16

Dear LINDA LOPEZ :

Here is your opportunity for a fresh start. Our client, Wheaton Franciscan Healthcare, indicates that your balance of \$115.34 is past due on your Wheaton Franciscan Med Group account. We can help you resolve your account through one of the easy payment options listed below.

- Option 1:** Include payment in the enclosed envelope with the remit portion below.
- Option 2:** Pay securely and confidentially online by check or credit card at [www.paycbe.com](http://www.paycbe.com). Your user ID is [REDACTED] and your password is [REDACTED] to access your account online. If you have already accessed this account and chosen a new password, please use that password and disregard the one provided above.
- Option 3:** Call us at (888)887-5430 to discuss paying with check by phone, credit/debit card.

You now have the opportunity to pay this account in full or we may report the debt to one or more of the three national credit bureaus after the fortieth (40th) day from the date of this letter.

Unless you notify this office within thirty (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 thirty (30) days after receiving this notice, that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within thirty (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. This is an attempt to collect a debt; any information obtained will be used for that purpose. This communication is from a debt collector.

Please call our office with change of address information.

**NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION.**

PLEASE DETACH AND RETURN LOWER PORTION WITH ENCLOSED ENVELOPE

29CDCBEG010050

PO BOX 2547  
 WATERLOO, IA 50704-2547  
 CHANGE SERVICE REQUESTED

IF PAYING BY CREDIT CARD, FILL OUT BELOW

CARD NUMBER		EXP DATE	CHECK CARD USING FOR PAYMENT	
SIGNATURE			<input type="checkbox"/> VISA	<input type="checkbox"/> MasterCard
ACCOUNT #:	DATE:		<input type="checkbox"/> DISCOVER	<input type="checkbox"/> AMERICAN EXPRESS
[REDACTED] 6836	10/28/16			
PLEASE PAY THIS AMOUNT:			AMOUNT ENCLOSED:	
\$115.34				

10/28/16 CALL: (888)887-5430 CS Number: [REDACTED] 0177

258649124  
  
 LOPEZ, LINDA L  
 1002 W Windlake Ave  
 Milwaukee WI 53204-3838

THE CBE GROUP, INC.  
 PAYMENT PROCESSING CENTER  
 PO BOX 2337  
 WATERLOO, IA 50704-2337



**TO ALL CONSUMERS – Notice about Electronic Check Conversion:** When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as the same day we receive your payment and you will not receive your check back from your financial institution. Also, you authorize us to represent a check as an electronic fund transfer from your account if your payment is returned unpaid.

**Please be aware of the following rights. This list does not contain a complete list of the rights consumers have under state and federal law.**

**California Residents:** The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or <http://www.ftc.gov/>.

Non-profit credit counseling services may be available in the area. State and federal law require debt collectors to treat you fairly and prohibit debt collectors from making false statements or threats of violence, using obscene or profane language, and making improper communications with third parties, including your employer.

As required by law, you are hereby notified that a negative credit agency report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations. We will not submit a negative credit report to a credit reporting agency about this credit obligation until the expiration of the time period described in the notice on the front of this letter.

**Colorado Residents:** The Colorado office of The CBE Group is located at 1776 S. Jackson Street, Suite 900, Denver, CO 80210, telephone (720)287-8648. FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE [WWW.COAG.GOV/CAR](http://WWW.COAG.GOV/CAR). A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt.

**Massachusetts Residents:** NOTICE OF IMPORTANT RIGHTS. You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked or delivered within seven days of such request. You may terminate this request by writing to the debt collector.

**Minnesota Residents:** This collection agency is licensed by the Minnesota Department of Commerce.

**Nevada Residents:** NOTE: If you pay or agree to pay all or any part of the debt referenced in this letter, your payment or agreement to pay may be construed as your acknowledgment of the debt and that you agree to waive any applicable statute of limitations. Seek legal advice if you have questions concerning your legal right or obligations relating to this debt.

**New York City Borough Residents:** Department of Consumer Affairs, City of New York, License # 1080974. Please contact Sabrina Lowery at the number listed on the front of this letter regarding this matter.

**North Carolina Residents:** North Carolina Department of Insurance Permit # 3568, North Carolina Department of Insurance Permit # 103066, North Carolina Department of Insurance Permit # 109072, North Carolina Department of Insurance Permit # 111791, North Carolina Department of Insurance Permit # 112794.

**Tennessee Residents:** This collection agency is licensed by the Collection Service Board, State Department of Commerce and Insurance.

**Utah Residents:** As required by Utah law, you are hereby notified that a negative credit report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

**Wisconsin Residents:** This collection agency is licensed by the Division of Banking in the Wisconsin Department of Financial Institutions, [www.wdfi.org](http://www.wdfi.org).

# Exhibit C





The CBE Group, Inc.  
 Corporate Address: 1309 Technology Pkwy, Cedar Falls, IA 50613  
 Hours of Operation: 8:00 a.m.- 6:00 p.m. CT Monday-Friday

CALL: (888)887-5430

CREDITOR: Wheaton Franciscan Healthcare

Your Account Number:	██████████6806
Total Amount Due:	\$196.19
CS Number:	██████████0177
Reference Number:	██████████
User ID:	██████████
Password:	██████████

10/28/16

Dear LINDA LOPEZ :

Here is your opportunity for a fresh start. Our client, Wheaton Franciscan Healthcare, indicates that your balance of \$196.19 is past due on your Wheaton Franciscan Med Group account. We can help you resolve your account through one of the easy payment options listed below.

- Option 1:** Include payment in the enclosed envelope with the remit portion below.
- Option 2:** Pay securely and confidentially online by check or credit card at [www.paycbe.com](http://www.paycbe.com). Your user ID is ██████████ and your password is ██████████ to access your account online. If you have already accessed this account and chosen a new password, please use that password and disregard the one provided above.
- Option 3:** Call us at (888)887-5430 to discuss paying with check by phone, credit/debit card.

You now have the opportunity to pay this account in full or we may report the debt to one or more of the three national credit bureaus after the fortieth (40th) day from the date of this letter.

Unless you notify this office within thirty (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 thirty (30) days after receiving this notice, that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within thirty (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. This is an attempt to collect a debt; any information obtained will be used for that purpose. This communication is from a debt collector.

Please call our office with change of address information.

**NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION.**

29CDCBEG010050

PLEASE DETACH AND RETURN LOWER PORTION WITH ENCLOSED ENVELOPE

PO BOX 2547  
 WATERLOO, IA 50704-2547  
 CHANGE SERVICE REQUESTED

IF PAYING BY CREDIT CARD, FILL OUT BELOW

CARD NUMBER	EXP DATE	CHECK CARD USING FOR PAYMENT	
SIGNATURE		<input type="checkbox"/>	<input type="checkbox"/>
ACCOUNT #: ██████████6806	DATE: 10/28/16	<input type="checkbox"/>	<input type="checkbox"/>
PLEASE PAY THIS AMOUNT: \$196.19	AMOUNT ENCLOSED:		

10/28/16 CALL: (888)887-5430 CS Number: ██████████0177

258649125

LOPEZ, LINDA L  
 1002 W Windlake Ave  
 Milwaukee WI 53204-3838

THE CBE GROUP, INC.  
 PAYMENT PROCESSING CENTER  
 PO BOX 2337  
 WATERLOO, IA 50704-2337

**TO ALL CONSUMERS – Notice about Electronic Check Conversion:** When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as the same day we receive your payment and you will not receive your check back from your financial institution. Also, you authorize us to represent a check as an electronic fund transfer from your account if your payment is returned unpaid.

**Please be aware of the following rights. This list does not contain a complete list of the rights consumers have under state and federal law.**

**California Residents:** The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or reason or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or <http://www.ftc.gov/>.

Non-profit credit counseling services may be available in the area. State and federal law require debt collectors to treat you fairly and prohibit debt collectors from making false statements or threats of violence, using obscene or profane language, and making improper communications with third parties, including your employer.

As required by law, you are hereby notified that a negative credit agency report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations. We will not submit a negative credit report to a credit reporting agency about this credit obligation until the expiration of the time period described in the notice on the front of this letter.

**Colorado Residents:** The Colorado office of The CBE Group is located at 1776 S. Jackson Street, Suite 900, Denver, CO 80210, telephone (720)287-8648. FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE [WWW.COAG.GOV/CAR](http://WWW.COAG.GOV/CAR). A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt.

**Massachusetts Residents:** NOTICE OF IMPORTANT RIGHTS. You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked or delivered within seven days of such request. You may terminate this request by writing to the debt collector.

**Minnesota Residents:** This collection agency is licensed by the Minnesota Department of Commerce.

**Nevada Residents:** NOTE: If you pay or agree to pay all or any part of the debt referenced in this letter, your payment or agreement to pay may be construed as your acknowledgment of the debt and that you agree to waive any applicable statute of limitations. Seek legal advice if you have questions concerning your legal right or obligations relating to this debt.

**New York City Borough Residents:** Department of Consumer Affairs, City of New York, License # 1080974. Please contact Sabrina Lowery at the number listed on the front of this letter regarding this matter.

**North Carolina Residents:** North Carolina Department of Insurance Permit # 3568, North Carolina Department of Insurance Permit # 103066, North Carolina Department of Insurance Permit # 109072, North Carolina Department of Insurance Permit # 111791, North Carolina Department of Insurance Permit # 112794.

**Tennessee Residents:** This collection agency is licensed by the Collection Service Board, State Department of Commerce and Insurance.

**Utah Residents:** As required by Utah law, you are hereby notified that a negative credit report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

**Wisconsin Residents:** This collection agency is licensed by the Division of Banking in the Wisconsin Department of Financial Institutions, [www.wdfi.org](http://www.wdfi.org).

# Exhibit D



CALL: (888)887-5430

CREDITOR: Wheaton Franciscan Healthcare

The CBE Group, Inc.  
Corporate Address: 1309 Technology Pkwy, Cedar Falls, IA 50613  
Hours of Operation: 8:00 a.m.- 6:00 p.m. CT Monday-Friday

Your Account Number:	██████████ 6826
Total Amount Due:	\$51.66
CS Number:	██████████ 0177
Reference Number:	██████████
User ID:	██████████
Password:	██████████

10/28/16

Dear LINDA LOPEZ :

Here is your opportunity for a fresh start. Our client, Wheaton Franciscan Healthcare, indicates that your balance of \$51.66 is past due on your Wheaton Franciscan Med Group account. We can help you resolve your account through one of the easy payment options listed below.

- Option 1:** Include payment in the enclosed envelope with the remit portion below.
- Option 2:** Pay securely and confidentially online by check or credit card at [www.paycbe.com](http://www.paycbe.com). Your user ID is ██████████ and your password is ██████████ to access your account online. If you have already accessed this account and chosen a new password, please use that password and disregard the one provided above.
- Option 3:** Call us at (888)887-5430 to discuss paying with check by phone, credit/debit card.

You now have the opportunity to pay this account in full or we may report the debt to one or more of the three national credit bureaus after the fortieth (40th) day from the date of this letter.

Unless you notify this office within thirty (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 thirty (30) days after receiving this notice, that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within thirty (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. This is an attempt to collect a debt; any information obtained will be used for that purpose. This communication is from a debt collector.

Please call our office with change of address information.

**NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION.**

29CDCBEG010050

PLEASE DETACH AND RETURN LOWER PORTION WITH ENCLOSED ENVELOPE

PO BOX 2547  
WATERLOO, IA 50704-2547  
CHANGE SERVICE REQUESTED

IF PAYING BY CREDIT CARD, FILL OUT BELOW

CARD NUMBER	EXP DATE	CHECK CARD USING FOR PAYMENT	
SIGNATURE		<input type="checkbox"/> VISA	<input type="checkbox"/> MasterCard
ACCOUNT #: ██████████ 6826	DATE: 10/28/16	<input type="checkbox"/> AMERICAN EXPRESS	<input type="checkbox"/> DISCOVER
PLEASE PAY THIS AMOUNT: \$51.66		AMOUNT ENCLOSED:	

10/28/16 CALL: (888)887-5430 CS Number: ██████████ 0177

258649126

LOPEZ, LINDA L  
1002 W Windlake Ave  
Milwaukee WI 53204-3838

THE CBE GROUP, INC.  
PAYMENT PROCESSING CENTER  
PO BOX 2337  
WATERLOO, IA 50704-2337

**TO ALL CONSUMERS – Notice about Electronic Check Conversion:** When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as the same day we receive your payment and you will not receive your check back from your financial institution. Also, you authorize us to represent a check as an electronic fund transfer from your account if your payment is returned unpaid.

**Please be aware of the following rights. This list does not contain a complete list of the rights consumers have under state and federal law.**

**California Residents:** The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or <http://www.ftc.gov/>.

Non-profit credit counseling services may be available in the area. State and federal law require debt collectors to treat you fairly and prohibit debt collectors from making false statements or threats of violence, using obscene or profane language, and making improper communications with third parties, including your employer.

As required by law, you are hereby notified that a negative credit agency report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations. We will not submit a negative credit report to a credit reporting agency about this credit obligation until the expiration of the time period described in the notice on the front of this letter.

**Colorado Residents:** The Colorado office of The CBE Group is located at 1776 S. Jackson Street, Suite 900, Denver, CO 80210, telephone (720)287-8648. FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE [WWW.COAG.GOV/CAR](http://WWW.COAG.GOV/CAR). A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt.

**Massachusetts Residents:** NOTICE OF IMPORTANT RIGHTS. You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked or delivered within seven days of such request. You may terminate this request by writing to the debt collector.

**Minnesota Residents:** This collection agency is licensed by the Minnesota Department of Commerce.

**Nevada Residents:** NOTE: If you pay or agree to pay all or any part of the debt referenced in this letter, your payment or agreement to pay may be construed as your acknowledgment of the debt and that you agree to waive any applicable statute of limitations. Seek legal advice if you have questions concerning your legal right or obligations relating to this debt.

**New York City Borough Residents:** Department of Consumer Affairs, City of New York, License # 1080974. Please contact Sabrina Lowery at the number listed on the front of this letter regarding this matter.

**North Carolina Residents:** North Carolina Department of Insurance Permit # 3568, North Carolina Department of Insurance Permit # 103066, North Carolina Department of Insurance Permit # 109072, North Carolina Department of Insurance Permit # 111791, North Carolina Department of Insurance Permit # 112794.

**Tennessee Residents:** This collection agency is licensed by the Collection Service Board, State Department of Commerce and Insurance.

**Utah Residents:** As required by Utah law, you are hereby notified that a negative credit report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

**Wisconsin Residents:** This collection agency is licensed by the Division of Banking in the Wisconsin Department of Financial Institutions, [www.wdfi.org](http://www.wdfi.org).

# Exhibit E



The CBE Group, Inc.  
 Corporate Address: 1309 Technology Pkwy, Cedar Falls, IA 50613  
 Hours of Operation: 8:00 a.m.- 6:00 p.m. CT Monday-Friday

10/28/16

Dear LINDA LOPEZ :

Here is your opportunity for a fresh start. Our client, Wheaton Franciscan Healthcare, indicates that your balance of \$82.56 is past due on your Wheaton Franciscan Med Group account. We can help you resolve your account through one of the easy payment options listed below.

- Option 1:** Include payment in the enclosed envelope with the remit portion below.
- Option 2:** Pay securely and confidentially online by check or credit card at [www.paycbe.com](http://www.paycbe.com). Your user ID is [REDACTED] and your password is [REDACTED] to access your account online. If you have already accessed this account and chosen a new password, please use that password and disregard the one provided above.
- Option 3:** Call us at (888)887-5430 to discuss paying with check by phone, credit/debit card.

You now have the opportunity to pay this account in full or we may report the debt to one or more of the three national credit bureaus after the fortieth (40th) day from the date of this letter.

Unless you notify this office within thirty (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 thirty (30) days after receiving this notice, that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within thirty (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. This is an attempt to collect a debt; any information obtained will be used for that purpose. This communication is from a debt collector.

Please call our office with change of address information.

**NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION.**

PLEASE DETACH AND RETURN LOWER PORTION WITH ENCLOSED ENVELOPE

29CDCBEG010050

PO BOX 2547  
 WATERLOO, IA 50704-2547  
 CHANGE SERVICE REQUESTED

IF PAYING BY CREDIT CARD, FILL OUT BELOW

CARD NUMBER	EXP DATE	CHECK CARD USING FOR PAYMENT	
SIGNATURE		<input type="checkbox"/>	<input type="checkbox"/>
ACCOUNT #: 6816	DATE: 10/28/16	<input type="checkbox"/>	<input type="checkbox"/>
PLEASE PAY THIS AMOUNT: \$82.56	AMOUNT ENCLOSED:		

10/28/16 CALL: (888)887-5430 CS Number: [REDACTED] 0177

258649127

LOPEZ, LINDA L  
 1002 W Windlake Ave  
 Milwaukee WI 53204-3838

THE CBE GROUP, INC.  
 PAYMENT PROCESSING CENTER  
 PO BOX 2337  
 WATERLOO, IA 50704-2337



**TO ALL CONSUMERS – Notice about Electronic Check Conversion:** When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as the same day we receive your payment and you will not receive your check back from your financial institution. Also, you authorize us to represent a check as an electronic fund transfer from your account if your payment is returned unpaid.

**Please be aware of the following rights. This list does not contain a complete list of the rights consumers have under state and federal law.**

**California Residents:** The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or <http://www.ftc.gov/>.

Non-profit credit counseling services may be available in the area. State and federal law require debt collectors to treat you fairly and prohibit debt collectors from making false statements or threats of violence, using obscene or profane language, and making improper communications with third parties, including your employer.

As required by law, you are hereby notified that a negative credit agency report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations. We will not submit a negative credit report to a credit reporting agency about this credit obligation until the expiration of the time period described in the notice on the front of this letter.

**Colorado Residents:** The Colorado office of The CBE Group is located at 1776 S. Jackson Street, Suite 900, Denver, CO 80210, telephone (720)287-8648. FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE [WWW.COAG.GOV/CAR](http://WWW.COAG.GOV/CAR). A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt.

**Massachusetts Residents:** NOTICE OF IMPORTANT RIGHTS. You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked or delivered within seven days of such request. You may terminate this request by writing to the debt collector.

**Minnesota Residents:** This collection agency is licensed by the Minnesota Department of Commerce.

**Nevada Residents:** NOTE: If you pay or agree to pay all or any part of the debt referenced in this letter, your payment or agreement to pay may be construed as your acknowledgment of the debt and that you agree to waive any applicable statute of limitations. Seek legal advice if you have questions concerning your legal right or obligations relating to this debt.

**New York City Borough Residents:** Department of Consumer Affairs, City of New York, License # 1080974. Please contact Sabrina Lowery at the number listed on the front of this letter regarding this matter.

**North Carolina Residents:** North Carolina Department of Insurance Permit # 3568, North Carolina Department of Insurance Permit # 103066, North Carolina Department of Insurance Permit # 109072, North Carolina Department of Insurance Permit # 111791, North Carolina Department of Insurance Permit # 112794.

**Tennessee Residents:** This collection agency is licensed by the Collection Service Board, State Department of Commerce and Insurance.

**Utah Residents:** As required by Utah law, you are hereby notified that a negative credit report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

**Wisconsin Residents:** This collection agency is licensed by the Division of Banking in the Wisconsin Department of Financial Institutions, [www.wdfi.org](http://www.wdfi.org).

# EXHIBIT F



The CBE Group, Inc.  
 Corporate Address: 1309 Technology Pkwy, Cedar Falls, IA 50613  
 Hours of Operation: 8:00 a.m.- 6:00 p.m. CT Monday-Friday

11/30/16

Dear LINDA LOPEZ :

Here is your opportunity for a fresh start. Our client, Wheaton Franciscan Healthcare, indicates that your balance of \$144.00 is past due. We can help you resolve your account through one of the easy payment options listed below.

- Option 1:** Include payment in the enclosed envelope with the remit portion below.
- Option 2:** Pay securely and confidentially online by check or credit card at [www.paycbe.com](http://www.paycbe.com). Your user ID is [REDACTED] and your password is [REDACTED] to access your account online. If you have already accessed this account and chosen a new password, please use that password and disregard the one provided above.
- Option 3:** Call us at (888)887-5430 to discuss paying with check by phone, credit/debit card.

You now have the opportunity to pay this account in full or we may report the debt to one or more of the three national credit bureaus after the fortieth (40th) day from the date of this letter.

Unless you notify this office within thirty (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 thirty (30) days after receiving this notice, that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within thirty (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. This is an attempt to collect a debt; any information obtained will be used for that purpose. This communication is from a debt collector.

Please call our office with change of address information.

**NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION.**

29\_CDCBEG01\_0050

PLEASE DETACH AND RETURN LOWER PORTION WITH ENCLOSED ENVELOPE

PO BOX 2547  
 WATERLOO, IA 50704-2547  
 CHANGE SERVICE REQUESTED

IF PAYING BY CREDIT CARD, FILL OUT BELOW

CARD NUMBER	EXP DATE	CHECK CARD USING FOR PAYMENT	
SIGNATURE		<input type="checkbox"/> VISA	<input type="checkbox"/> MASTERCARD
ACCOUNT #: [REDACTED] 7546	DATE: 11/30/16	<input type="checkbox"/> AMERICAN EXPRESS	<input type="checkbox"/> DISCOVER
PLEASE PAY THIS AMOUNT: \$144.00	AMOUNT ENCLOSED:		

11/30/16 CALL: (888)887-5430 CS Number: [REDACTED] 0177

283630140  
  
 LOPEZ, LINDA L  
 1002 W Windlake Ave  
 Milwaukee WI 53204-3838

THE CBE GROUP, INC.  
 PAYMENT PROCESSING CENTER  
 PO BOX 2337  
 WATERLOO, IA 50704-2337

**TO ALL CONSUMERS – Notice about Electronic Check Conversion:** When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as the same day we receive your payment and you will not receive your check back from your financial institution. Also, you authorize us to represent a check as an electronic fund transfer from your account if your payment is returned unpaid.

**Please be aware of the following rights. This list does not contain a complete list of the rights consumers have under state and federal law.**

**California Residents:** The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or <http://www.ftc.gov/>.

Non-profit credit counseling services may be available in the area. State and federal law require debt collectors to treat you fairly and prohibit debt collectors from making false statements or threats of violence, using obscene or profane language, and making improper communications with third parties, including your employer.

As required by law, you are hereby notified that a negative credit agency report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations. We will not submit a negative credit report to a credit reporting agency about this credit obligation until the expiration of the time period described in the notice on the front of this letter.

**Colorado Residents:** The Colorado office of The CBE Group is located at 1776 S. Jackson Street, Suite 900, Denver, CO 80210, telephone (720)287-8648. FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE [WWW.COAG.GOV/CAR](http://WWW.COAG.GOV/CAR). A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt.

**Massachusetts Residents:** NOTICE OF IMPORTANT RIGHTS. You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked or delivered within seven days of such request. You may terminate this request by writing to the debt collector.

**Minnesota Residents:** This collection agency is licensed by the Minnesota Department of Commerce.

**Nevada Residents:** NOTE: If you pay or agree to pay all or any part of the debt referenced in this letter, your payment or agreement to pay may be construed as your acknowledgment of the debt and that you agree to waive any applicable statute of limitations. Seek legal advice if you have questions concerning your legal right or obligations relating to this debt.

**New York City Borough Residents:** Department of Consumer Affairs, City of New York, License # 1080974. Please contact Sabrina Lowery at the number listed on the front of this letter regarding this matter.

**North Carolina Residents:** North Carolina Department of Insurance Permit # 3568, North Carolina Department of Insurance Permit # 103066, North Carolina Department of Insurance Permit # 109072, North Carolina Department of Insurance Permit # 111791, North Carolina Department of Insurance Permit # 112794.

**Tennessee Residents:** This collection agency is licensed by the Collection Service Board, State Department of Commerce and Insurance.

**Utah Residents:** As required by Utah law, you are hereby notified that a negative credit report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

**Wisconsin Residents:** This collection agency is licensed by the Division of Banking in the Wisconsin Department of Financial Institutions, [www.wdfi.org](http://www.wdfi.org).

# **Exhibit G**



The CBE Group, Inc.  
 1309 Technology Pkwy, Cedar Falls, IA 50613  
 Monday-Thur 7am-9pm  
 Friday 7am-5pm

08/28/17

Call: (866)913-3133
Creditor: Time Warner Cable
Account Number: [REDACTED] 5501
CS Number: [REDACTED] 9858
Reference Number: [REDACTED]

**Total Amount Due: \$224.15**

 *Pay Online – Account resolution the easy way.*

Login to your account at [www.paycbegroup.com](http://www.paycbegroup.com) to quickly and easily pay your balance in full or setup payment arrangements.

Dear Marlene B Kanehl :

We have attempted to contact you regarding the above referenced account. At this time we are showing an outstanding balance of \$224.15. If you are unable to pay the balance in full, call our office to discuss alternative payment arrangements.

If you would like to resolve your account by mail additional payment coupons have been provided that have dates and amounts to assist you. Please feel free to increase your payment amounts or pay earlier if you are able.

**This is an attempt to collect a debt; any information obtained will be used for that purpose.  
 This communication is from a debt collector.  
 NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION.**

PLEASE DETACH AND RETURN LOWER PORTION WITH ENCLOSED ENVELOPE

178\_CDCBEG04\_0241


PO BOX 2635  
 WATERLOO, IA 50704-2635  
 CHANGE SERVICE REQUESTED

IF PAYING BY CREDIT/DEBIT, FILL OUT BELOW

CARD NUMBER	EXP DATE	SELECT CARD USING FOR PAYMENT
SIGNATURE	<input type="checkbox"/> VISA <input type="checkbox"/> M/C <input type="checkbox"/> D/C <input type="checkbox"/> DISCOVER	
<b>PAYMENT AMOUNT: PLEASE PAY THIS AMOUNT \$56.04</b> <b>PLEASE PAY BY: 09/12/17</b>		
ACCT#:	5501	CS #: [REDACTED] 9858 REF #: [REDACTED] DATE: 08/28/17

CALL: (866)913-3133  
 2167209868-1-136-29009239



511365431  
  
 Marlene B Kanehl  
 3872 S Lake Dr  
 Unit 205  
 Saint Francis WI 53235-5234

THE CBE GROUP, INC.  
 Payment Processing Center  
 PO Box 300  
 Waterloo, IA 50704-0300

**TO ALL CONSUMERS – Notice about Electronic Check Conversion:** When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as the same day we receive your payment and you will not receive your check back from your financial institution. Also, you authorize us to represent a check as an electronic fund transfer from your account if your payment is returned unpaid.

**Please be aware of the following rights. This list does not contain a complete list of the rights consumers have under state and federal law.**

**California Residents:** The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or <http://www.ftc.gov/>.

Non-profit credit counseling services may be available in the area. State and federal law require debt collectors to treat you fairly and prohibit debt collectors from making false statements or threats of violence, using obscene or profane language, and making improper communications with third parties, including your employer.

As required by law, you are hereby notified that a negative credit agency report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

**Colorado Residents:** The Colorado office of The CBE Group is located at 1776 S. Jackson Street, Suite 900, Denver, CO 80210, telephone (720)287-8648. FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE [WWW.COAG.GOV/CAR](http://WWW.COAG.GOV/CAR). A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt.

**Massachusetts Residents:** NOTICE OF IMPORTANT RIGHTS. You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked or delivered within seven days of such request. You may terminate this request by writing to the debt collector.

**Minnesota Residents:** This collection agency is licensed by the Minnesota Department of Commerce.

**Nevada Residents:** NOTE: If you pay or agree to pay all or any part of the debt referenced in this letter, your payment or agreement to pay may be construed as your acknowledgment of the debt and that you agree to waive any applicable statute of limitations. Seek legal advice if you have questions concerning your legal right or obligations relating to this debt.

**New York City Borough Residents:** Department of Consumer Affairs, City of New York, License # 1080974. Please contact Matt Wolk at the number listed on the front of this letter regarding this matter.

**North Carolina Residents:** North Carolina Department of Insurance Permit # 3568, North Carolina Department of Insurance Permit # 103066, North Carolina Department of Insurance Permit # 109072, North Carolina Department of Insurance Permit # 111791, North Carolina Department of Insurance Permit #112794.

**Tennessee Residents:** This collection agency is licensed by the Collection Service Board, State Department of Commerce and Insurance.

**Utah Residents:** As required by Utah law, you are hereby notified that a negative credit report reflecting on your credit record may be submitted to a credit reporting agency if you fail to fulfill the terms of your credit obligations.

**Wisconsin Residents:** This collection agency is licensed by the Division of Banking in the Wisconsin Department of Financial Institutions, [www.wdfi.org](http://www.wdfi.org).



Po Box 2635  
Waterloo, IA 50704-2635

IF PAYING BY CREDIT/DEBIT, FILL OUT BELOW

CARD NUMBER	EXP. DATE	SELECT CARD USING FOR PAYMENT
SIGNATURE		<input type="checkbox"/> VISA <input type="checkbox"/> M/C <input type="checkbox"/> DISC. VISA <input type="checkbox"/> AMERICAN EXPRESS
PAYMENT AMOUNT PLEASE PAY THIS AMOUNT \$56.04 PLEASE PAY BY: 12/11/17		
ACCT#	CS #	REF # DATE: 08/28/17

CALL: (866)913-3133  
2167209856-1-135-29009239

0241 511365431

Marlene B Kanehl  
3872 S Lake Dr  
Unit 205  
Saint Francis WI 53235-5234

THE CBE GROUP, INC.  
Payment Processing Center  
PO Box 300  
Waterloo, IA 50704-0300

21 [REDACTED] 785800000135 0000000022415 082817 [REDACTED] 2

Please detach carefully and include this coupon with your payment

Po Box 2635  
Waterloo, IA 50704-2635

IF PAYING BY CREDIT/DEBIT, FILL OUT BELOW

CARD NUMBER	EXP. DATE	SELECT CARD USING FOR PAYMENT
SIGNATURE		<input type="checkbox"/> VISA <input type="checkbox"/> M/C <input type="checkbox"/> DISC. VISA <input type="checkbox"/> AMERICAN EXPRESS
PAYMENT AMOUNT PLEASE PAY THIS AMOUNT \$56.04 PLEASE PAY BY: 11/11/17		
ACCT#	CS #	REF # DATE: 08/28/17

CALL: (866)913-3133

0241 511365431

Marlene B Kanehl  
3872 S Lake Dr  
Unit 205  
Saint Francis WI 53235-5234

THE CBE GROUP, INC.  
Payment Processing Center  
PO Box 300  
Waterloo, IA 50704-0300

21 [REDACTED] 785800000135 0000000022415 082817 [REDACTED] 2

Please detach carefully and include this coupon with your payment

Po Box 2635  
Waterloo, IA 50704-2635

IF PAYING BY CREDIT/DEBIT, FILL OUT BELOW

CARD NUMBER	EXP. DATE	SELECT CARD USING FOR PAYMENT
SIGNATURE		<input type="checkbox"/> VISA <input type="checkbox"/> M/C <input type="checkbox"/> DISC. VISA <input type="checkbox"/> AMERICAN EXPRESS
PAYMENT AMOUNT PLEASE PAY THIS AMOUNT \$56.04 PLEASE PAY BY: 10/12/17		
ACCT#	CS #	REF # DATE: 08/28/17

CALL: (866)913-3133

0241 511365431

Marlene B Kanehl  
3872 S Lake Dr  
Unit 205  
Saint Francis WI 53235-5234

THE CBE GROUP, INC.  
Payment Processing Center  
PO Box 300  
Waterloo, IA 50704-0300

Case 2:17-cv-00000-135-WED Filed 09/29/17 Page 4 of 4 Document 72

21 [REDACTED] 785800000135 0000000022415 082817 [REDACTED] 2

2 of 2

# 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 THE REVERSE OF THE FORM.)

Place an X in the appropriate Box:  Green Bay Division  Milwaukee Division

**I. (a) PLAINTIFFS**  
**DUANE LINDENBACH, et al.**

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

**(c) Attorney's** (Firm Name, Address, and Telephone Number)  
 Ademi & O'Reilly, LLP, 3620 E. Layton Ave., Cudahy, WI 53110  
 (414) 482-8000-Telephone (414) 482-8001-Facsimile

**DEFENDANTS**  
**THE CBE GROUP, INC.**

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

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE 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 <i>or</i> 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 <i>and</i> 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 (Excl. 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	<b>PERSONAL INJURY</b> <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	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <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"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <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)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<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"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	LABOR	IMMIGRATION	
<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	<input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	

**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  7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
 15 U.S.C. 1692 et seq

Brief description of cause:  
 Violation of Fair Debt Collection Practices Act

**VII. REQUESTED IN COMPLAINT:**  CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$** \_\_\_\_\_ **CHECK YES only if demanded in complaint:**  
**JURY DEMAND:**  Yes  No

**VIII. RELATED CASE(S) IF ANY** (See instructions): JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE: September 29, 2017 SIGNATURE OF ATTORNEY OF RECORD: s/ John D. Blythin

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

**VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553

Brief Description: Unauthorized reception of cable service

**VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

**VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

UNITED STATES DISTRICT COURT
for the
Eastern District of Wisconsin

DUANE LINDENBACH, et al.

Plaintiff(s)

v.

THE CBE GROUP, INC., et al.

Defendant(s)

Civil Action No. 17-cv-

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) THE CBE GROUP, INC.
c/o CORPORATION SERVICE COMPANY
8040 EXCELSIOR DRIVE SUITE 400
MADISON, WI 53717

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:

John D. Blythin
Ademi & O'Reilly, LLP
3620 East Layton Avenue
Cudahy, WI 53110

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

Civil Action No. 17-cv-

**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: [Three WI Consumers Claim The CBE Group Violated the FDCPA](#)

---