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Attorneys for Plaintiffs
Our File No.: 114644

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

Caroline Mckeown, Johanne Joseph and Karol Espinal,
individually and on behalf of all those similarly situated,

Plaintiffs,

vs.

Collection Bureau of the Hudson Valley, Inc.,

Defendant.

Docket No:

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

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

Caroline Mckeown, Johanne Joseph and Karol Espinal, individually and on behalf of all those similarly situated (hereinafter referred to collectively as “*Plaintiffs*”), by and through the undersigned counsel, complain, state and allege against Collection Bureau of the Hudson Valley, Inc. (hereinafter referred to as “*Defendant*”), as follows:

INTRODUCTION

1. This action seeks to recover for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (“FDCPA”).

JURISDICTION AND VENUE

2. This Court has federal subject matter jurisdiction pursuant to 28 U.S.C. §1331 and 15 U.S.C. § 1692k(d).

3. Venue is proper under 28 U.S.C. §1391(b) because a substantial part of the events or omissions giving rise to the claim occurred in this Judicial District.

4. At all relevant times, Defendant conducted business within the State of New York.

PARTIES

5. Plaintiff Caroline Mckeown is an individual who is a citizen of the State of New York residing in Suffolk County, New York.

6. Plaintiff Karol Espinal is an individual who is a citizen of the State of New York residing in Suffolk County, New York.

7. Plaintiff Johanne Joseph is an individual who is a citizen of the State of New York residing in Kings County, New York.

8. Plaintiffs are “consumers” as defined by 15 U.S.C. § 1692a(3).

9. On information and belief, Defendant Collection Bureau of the Hudson Valley, Inc., is a New York Corporation with a principal place of business in Orange County, New York.

10. Defendant is regularly engaged, for profit, in the collection of debts allegedly owed by consumers.

11. Defendant is a “debt collector” as defined by 15 U.S.C. § 1692a(6).

ALLEGATIONS

12. Defendant alleges each of the Plaintiffs owe a debt (“the Debts”).

13. The Debts were primarily for personal, family or household purposes and are therefore “debts” as defined by 15 U.S.C. § 1692a(5).

14. Sometime after the incurrence of the Debts, Plaintiffs fell behind on payments owed.

15. Thereafter, at an exact time known only to Defendant, the Debts were assigned or otherwise transferred to Defendant for collection.

16. In its efforts to collect the debt alleged owed by Plaintiff Mckeown, Defendant contacted Plaintiff Mckeown by letter dated August 24, 2017. (“**Exhibit 1.**”)

17. In its efforts to collect the debt alleged owed by Plaintiff Espinal, Defendant contacted Plaintiff Espinal by letter dated August 16, 2017. (“**Exhibit 1.**”)

18. In its efforts to collect the debt alleged owed by Plaintiff Joseph, Defendant contacted Plaintiff Joseph by letter dated July 31, 2017. (“**Exhibit 1.**”)

19. The Letter was the initial communication Plaintiff Mckeown received from

Defendant.

20. The Letter was the initial communication Plaintiff Espinal received from

Defendant.

21. The Letters are “communications” as defined by 15 U.S.C. § 1692a(2).

22. The Letters are identical for all relevant purposes herein.

23. 15 U.S.C. § 1692g provides that within five days after the initial communication with a consumer in connection with the collection of any debt, a debt collector shall, unless the information is contained in the initial communication or the consumer has paid the debt, send the consumer a written notice containing certain enumerated information.

24. One such requirement is that the debt collector provide “the name of the creditor to whom the debt is owed.” 15 U.S.C. § 1692g(a)(2).

25. A debt collector has the obligation not just to convey the name of the creditor to whom the debt is owed, but also to convey such clearly.

26. A debt collector has the obligation not just to convey the name of the creditor to whom the debt is owed, but also to state such explicitly.

27. Merely naming the creditor without specifically identifying the entity as the current creditor to whom the debt is owed is not sufficient to comply with 15 U.S.C. § 1692g(a)(2).

28. Even if a debt collector conveys the required information, the debt collector nonetheless violates the FDCPA if it conveys that information in a confusing or contradictory fashion so as to cloud the required message with uncertainty.

29. When determining whether the name of the creditor to whom the debt is owed has been conveyed clearly, an objective standard, measured by how the “least sophisticated consumer” would interpret the notice, is applied.

30. The Letters reference “OPTIMUM.”

31. The Letters fail to identify by name and label any entity as “original creditor,” “current creditor,” or “creditor to whom the debt is owed.”

32. “OPTIMUM,” even if meant as the creditor to whom the debt is owed (which is not stated in the letters), is not specific enough to apprise Plaintiff of the identity of the debt.

33. There is no entity named “OPTIMUM” registered with the New York State Department of State, Division of Corporations.

34. Conversely, there are four hundred sixty-eight (468) disparate entities registered in New York that begin their legal name with “OPTIMUM.”

35. The least sophisticated consumer would likely be confused as to which of the four hundred sixty-eight (468) disparate entities registered in New York that begin their legal name with “OPTIMUM” is the creditor to whom the debt is owed.

36. The least sophisticated consumer would likely be uncertain as to which of the four hundred sixty-eight (468) disparate entities registered in New York that begin their legal name with “OPTIMUM” is the creditor to whom the debt is owed.

37. Defendant failed to explicitly state the name of the creditor to whom the debt is owed.

38. Defendant failed to clearly state the name of the creditor to whom the debt is owed.

39. The least sophisticated consumer would likely be confused as to the name of the creditor to whom the debt is owed.

40. The least sophisticated consumer would likely be uncertain as to the name of the creditor to whom the debt is owed.

41. Defendant has violated § 1692g as it failed to clearly and explicitly convey the name of the creditor to whom the debt is owed.

42. 15 U.S.C. § 1692e prohibits a debt collector from using any false, deceptive, or misleading representation or means in connection with the collection of any debt.

43. While § 1692e specifically prohibits certain practices, the list is non-exhaustive, and does not preclude a claim of falsity or deception based on any non-enumerated practice.

44. The question of whether a collection letter is deceptive is determined from the perspective of the “least sophisticated consumer.”

45. A collection letter is deceptive under 15 U.S.C. § 1692e if it can reasonably be read by the least sophisticated consumer to have two or more meanings, one of which is inaccurate.

46. A collection letter is also deceptive under 15 U.S.C. § 1692e if it is reasonably susceptible to an inaccurate reading by the least sophisticated consumer.

47. For purposes of 15 U.S.C. § 1692e, the failure to clearly and accurately identify the creditor to whom the debt is owed is unfair and deceptive to the least sophisticated consumer.

48. The identity of creditor to whom the debt is owed is a material piece of information to a consumer.

49. Knowing the identity of creditor to whom the debt is owed affects how a consumer responds to a debt collector's attempts to collect the debt.

50. Because the Letters can reasonably be read by the least sophisticated consumer to have two or more meanings, one of which is inaccurate, as described, they are deceptive within the meaning of 15 U.S.C. § 1692e.

51. Because the Letters are reasonably susceptible to an inaccurate reading by the least sophisticated consumer, as described, they are deceptive within the meaning of 15 U.S.C. § 1692e.

52. The least sophisticated consumer would likely be deceived by the Letters.

53. The least sophisticated consumer would likely be deceived in a material way by the Letters.

54. Defendant violated § 1692e by using a false, deceptive and misleading representation in its attempt to collect a debt.

CLASS ALLEGATIONS

55. Plaintiffs bring this action individually and as a class action on behalf of all persons similarly situated in the State of New York from whom Defendant attempted to collect a consumer debt using a collection letter that references only "OPTIMUM," from one year before the date of this Complaint to the present.

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

57. Defendant regularly engages in debt collection.

58. The Class consists of more than 35 persons from whom Defendant attempted to collect delinquent consumer debts using a collection letter that references only "OPTIMUM."

59. Plaintiffs' claims are typical of the claims of the Class. Common questions of law or fact raised by this class action complaint affect all members of the Class and predominate over any individual issues. Common relief is therefore sought on behalf of all members of the Class. This class action is superior to other available methods for the fair and efficient adjudication of this controversy.

60. The prosecution of separate actions by individual members of the Class would create a risk of inconsistent or varying adjudications with respect to the individual members of the Class, and a risk that any adjudications with respect to individual members of the Class would, as a practical matter, either be dispositive of the interests of other members of the Class not party to the adjudication, or substantially impair or impede their ability to protect their interests. Defendant has acted in a manner applicable to the Class as a whole such that declaratory relief is warranted.

61. Plaintiffs will fairly and adequately protect and represent the interests of the Class. The management of the class action proposed is not extraordinarily difficult, and the factual and legal issues raised by this class action complaint will not require extended contact with the members of the Class, because Defendant's conduct was perpetrated on all members of the Class and will be established by common proof. Moreover, Plaintiffs have retained counsel experienced in actions brought under consumer protection laws.

JURY DEMAND

62. Plaintiffs hereby demand a trial of this action by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request judgment as follows:

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

DATED: July 22, 2018

BARSHAY SANDERS, PLLC

By: /s/ Craig B. Sanders

Craig B. Sanders, Esq.

100 Garden City Plaza, Suite 500

Garden City, New York 11530

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Fax: (516) 706-5055

csanders@barshaysanders.com

Attorneys for Plaintiffs

Our File No.: 114644

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



COLLECTION BUREAU OF THE HUDSON VALLEY, INC.

CBHV Reference #: [REDACTED] 2379	Balance Due: \$387.11
--------------------------------------	--------------------------

DATE: 08/24/17

Please write your CBHV Reference # on your check.

Change of Address

(fill out on reverse side)

1 MB *A-01-MOB-AM-02858-10



CAROLYN MCKEOWN
197 NINA ST
HOLBROOK NY 11741-4609



Please send correspondence to this address.



CBHV
PO BOX 831
NEWBURGH NY 12551-0831

▲ DETACH HERE ▲

Dear CAROLYN MCKEOWN:

This past due account has been placed for collection.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request of this office in writing within 30 days after receiving this notice this office will provide you with the name and address of the original creditor, if different from the current creditor.

Please see reverse side for important information.

Creditor	Account Number	CBHV Reference #	Transaction Date	Balance Due
OPTIMUM.	[REDACTED] 068-6	[REDACTED] 2379	07/18/17	\$387.11

Phone or Web Payment



For inquiries or to make a payment by phone, please call MR STEWART at (888) 913-7489 or (201) 350-8767. To make a secure payment online, please visit www.cbhv.com/make-online-payment



Collection Bureau of the Hudson Valley, Inc. - Address and Office Hours (Eastern Time):

PO Box 831 • 155 North Plank Road • Newburgh, NY 12550
Monday through Thursday: 8:30 AM – 9:00 PM • Friday: 8:30 AM – 5:00 PM • Saturday: 8:30 AM – 12:30 PM
Phone: (845) 561-6880 • (800) 745-1395 • Fax: (845) 913-7403

Member of ACA International Since 1975

Your name: _____ Home Phone _____
 Street: _____ Business Phone _____
 City: _____ State _____ Zip _____
 Employer _____
 Method of Payment (check one) Insurance Co. _____
 Check Enclosed _____ Visa _____ Address _____
 MasterCard _____ Group # _____ ID# _____
 Acct # _____ Effective Date: _____
 Expiration Date: ____/____/____ Subscriber: _____
 Charge Amount: _____ Subscriber SS#: _____
 Signature _____

New York City

New York City Department of Consumer Affairs License Number: 0905924

There is a \$20.00 fee for returned checks.

THIS IS AN ATTEMPT TO COLLECT A DEBT BY A DEBT COLLECTOR AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.



COLLECTION BUREAU OF THE HUDSON VALLEY, INC.

CBHV Reference #: 172261100	Balance Due: \$400.13
--------------------------------	--------------------------

DATE: 08/16/17

Please write your CBHV Reference # on your check.

Change of Address

(fill out on reverse side)

1 AB *A-01-AV3-AM-04488-16



KAROL ESPINAL
7 LOCUST AVE
BABYLON NY 11702-2207



Please send correspondence to this address.



CBHV
PO BOX 831
NEWBURGH NY 12551-0831

DETACH HERE

Dear KAROL ESPINAL:

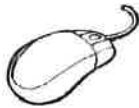
This past due account has been placed for collection.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt, or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request of this office in writing within 30 days after receiving this notice this office will provide you with the name and address of the original creditor, if different from the current creditor.

Please see reverse side for important information.

Creditor	Account Number	CBHV Reference #	Transaction Date	Balance Due
OPTIMUM.	██████████562-5	██████████1100	07/10/17	\$400.13

Phone or Web Payment



For inquiries or to make a payment by phone, please call MR STEWART at (888) 913-7489 or (973) 721-6367. To make a secure payment online, please visit www.cbhv.com/make-online-payment



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Monday through Thursday: 8:30 AM – 9:00 PM • Friday: 8:30 AM – 5:00 PM • Saturday: 8:30 AM – 12:30 PM
Phone: (845) 561-6880 • (800) 745-1395 • Fax: (845) 913-7403

Member of ACA International Since 1975

Your name: _____ Home Phone _____
Street: _____ Business Phone _____
City: _____ State _____ Zip _____
Employer _____

Method of Payment (check one) Insurance Co. _____
Check Enclosed _____ Visa _____ Address _____
MasterCard _____ Group # _____ ID# _____
Acct # _____ Effective Date: _____
Expiration Date: ____/____/____ Subscriber: _____
Charge Amount: _____ Subscriber SS#: _____
Signature _____

New York City

New York City Department of Consumer Affairs License Number: 0905924

There is a \$20.00 fee for returned checks.

**THIS IS AN ATTEMPT TO COLLECT A DEBT BY A DEBT COLLECTOR AND ANY INFORMATION
OBTAINED WILL BE USED FOR THAT PURPOSE.**

COLLECTION BUREAU OF THE HUDSON VALLEY, INC.

Please send correspondence to address:



PO Box 831
Newburgh NY 12551-0831

07/31/17

CREDITOR	ACCOUNT NUMBER	CBHV REFERENCE #	TRANSACTION DATE
OPTIMUM.	280-4	4547	05/09/17
SERVICE BALANCE	EQUIPMENT BALANCE	TOTAL BALANCE	
\$448.43	\$0.00	\$448.43	

NOTICE OF INTENT

Dear JOHANNE JOSEPH:

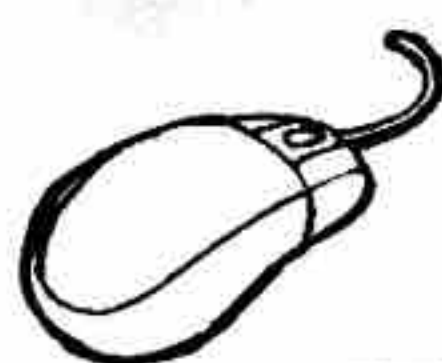
Our records indicate there is still a balance on this past due account. Please respond to this letter within seven days or we may take additional collection efforts.

The creditor shown above has authorized us to submit this account to the nationwide credit reporting agencies. As required by 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.

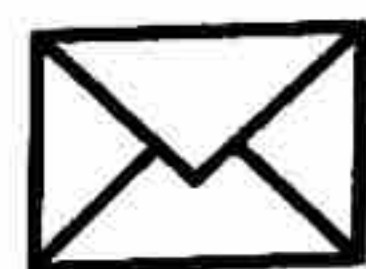
Payment can be made by check, check by phone, money order, credit card, debit card, or by visiting our website at www.cbhv.com/make-online-payment.



For inquiries or to make a payment by phone, please call MR STEWART at (888) 913-7489 or (973) 721-6367



To make a secure payment online, please visit www.cbhv.com/make-online-payment



Please mail payments or correspondence to:
CBHV
PO Box 831,
Newburgh NY 12551-0831
Please write your CBHV Reference # on your check.
CBHV Reference # 4547



For equipment return locations, please visit www.cbhv.com/locations
For instructions to return by mail, please visit www.optimum.net/pages/equipmentShippingInstructions.html

New York City

New York City Department of Consumer Affairs License Number: 0905924

THIS IS AN ATTEMPT TO COLLECT A DEBT BY A DEBT COLLECTOR AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

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Phone: (845) 561-6880 • (800) 745-1395 • Fax: (845) 913-7403

Member of ACA International Since 1975

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT
for the
EASTERN DISTRICT OF NEW YORK

Caroline Mckeown, Johanne Joseph and Karol)	
Espinal, individually and on behalf of all those)	
similarly situated)	
_____)	
<i>Plaintiff(s)</i>)	Civil Action No.
)	
v.)	
)	
Collection Bureau of the Hudson Valley, Inc.)	
_____)	
<i>Defendant(s)</i>)	

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*
Collection Bureau of the Hudson Valley, Inc.
155 N. Plank Road
Newburgh, New York 12550

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) – or 60 days if you are the United States, or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) – you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff’s attorney, whose name and address are:

BARSHAY SANDERS PLLC
100 GARDEN CITY PLAZA, SUITE 500
GARDEN CITY, NY 11530

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS: CAROLINE MCKEOWN
(b) County of Residence of First Listed Plaintiff: SUFFOLK
(c) Attorneys: BARSHAY SANDERS, PLLC
DEFENDANTS: COLLECTION BUREAU OF THE HUDSON VALLEY, INC
County of Residence of First Listed Defendant: ORANGE

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)
O 1 U.S. Government Plaintiff
O 2 U.S. Government Defendant
O 3 Federal Question
O 4 Diversity

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country

IV. NATURE OF SUIT (Place an "X" in One Box Only)
CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES

V. ORIGIN (Place an "X" in One Box Only)
O 1 Original Proceeding
O 2 Removed from State Court
O 3 Remanded from Appellate Court
O 4 Reinstated or Reopened
O 5 Transferred from Another District (specify)
O 6 Multidistrict Litigation - Transfer
O 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 15 USC §1692
Brief description of cause: 15 USC §1692 Fair Debt Collection Practices Act Violation

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

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

DATE: July 23, 2018
SIGNATURE OF ATTORNEY OF RECORD: /s Craig B. Sanders

FOR OFFICE USE ONLY
RECEIPT # AMOUNT APPLYING IFF JUDGE MAG. JUDGE

CERTIFICATION OF ARBITRATION ELIGIBILITY

Local Arbitration Rule 83.10 provides that with certain exceptions, actions seeking money damages only in an amount not in excess of \$150,000, exclusive of interest and costs, are eligible for compulsory arbitration. The amount of damages is presumed to be below the threshold amount unless a certification to the contrary is filed.

I, Craig B. Sanders, counsel for Plaintiff, do hereby certify that the above captioned civil action is ineligible for compulsory arbitration for the following reason(s):

- monetary damages sought are in excess of \$150,000, exclusive of interest and costs,
- the complaint seeks injunctive relief,
- the matter is otherwise ineligible for the following reason

DISCLOSURE STATEMENT - FEDERAL RULES CIVIL PROCEDURE 7.1

Identify any parent corporation and any publicly held corporation that owns 10% or more of its stocks:

RELATED CASE STATEMENT (Section VIII on the Front of this Form)

Please list all cases that are arguably related pursuant to Division of Business Rule 50.3.1 in Section VIII on the front of this form. Rule 50.3.1 (a) provides that "A civil case is "related" to another civil case for purposes of this guideline when, because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a substantial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge." Rule 50.3.1 (b) provides that " A civil case shall not be deemed "related" to another civil case merely because the civil case: (A) involves identical legal issues, or (B) involves the same parties." Rule 50.3.1 (c) further provides that "Presumptively, and subject to the power of a judge to determine otherwise pursuant to paragraph (d), civil cases shall not be deemed to be "related" unless both cases are still pending before the court."

NY-E DIVISION OF BUSINESS RULE 50.1(d)(2)

1. Is the civil action being filed in the Eastern District removed from a New York State Court located in Nassau or Suffolk County: NO
2. If you answered "no" above:
 - a) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in Nassau or Suffolk County? YES
 - b) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in the Eastern District? YES
 - c) If this is a Fair Debt Collection Practice Act case, specific the County in which the offending communication was received: SUFFOLK

If your answer to question 2 (b) is "No," does the defendant (or a majority of the defendants, if there is more than one) reside in Nassau or Suffolk County, or, in an interpleader action, does the claimant (or a majority of the claimants, if there is more than one) reside in Nassau or Suffolk County? Yes No

(Note: A corporation shall be considered a resident of the County in which it has the most significant contacts).

BAR ADMISSION

I am currently admitted in the Eastern District of New York and currently a member in good standing of the bar of this court. Yes No

Are you currently the subject of any disciplinary action (s) in this or any other state or federal court? Yes (If yes, please explain) No

I certify the accuracy of all information provided above.

Signature: /s Craig B. Sanders

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Collection Bureau of the Hudson Valley Sued Over Allegedly Unlawful Collection Letters](#)
