

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

LORALIE NOLET, Individually and on Behalf of ) All Others Similarly Situated, )  Plaintiff, ) vs. )  ALLTRAN FINANCIAL, LP, )  Defendant. )	Case No.: 17-cv-1611  <b>CLASS ACTION COMPLAINT</b>  <b>Jury Trial Demanded</b>
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**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”) and the Wisconsin Consumer Act, Chs. 421-427, Wis. Stats. (the “WCA”).

**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, 1337, and 1367. Venue in this District is proper in that Defendant directed its collection efforts into the District.

**PARTIES**

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

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

5. Plaintiff is also a “customer” as defined in the WCA, Wis. Stat. § 421.301(17), in that the alleged debt allegedly arose from a consumer transaction that included an agreement to defer payment.

6. Defendant Alltran Financial, LP (“Alltran”) is a debt collection agency with its principal place of business located at 5800 North Course Drive, Houston, Texas 77072.

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

8. Alltran is engaged in the business of collecting debts owed to others and incurred for personal, family or household purposes. Alltran is a debt collector as defined in 15 U.S.C. § 1692a and Wis. Stat. 427.103(3).

### **FACTS**

9. On or about January 4, 2017, Alltran mailed a debt collection letter to Nolet regarding an alleged debt, allegedly owed to “Citibank, N.A. CITI MASTERCARD” (Citibank). A copy of this letter is attached to this complaint as Exhibit A.

10. The alleged debt identified in Exhibit A is an alleged credit card account, allegedly owed to Citibank, and used only for personal, family or household purposes.

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

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

13. Upon information and belief, Exhibit A is the first communication Nolet received from Defendant.

14. Exhibit A contains the statutory validation notice that is required by the FDCPA, 15 U.S.C. § 1692g:

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of the debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within the thirty day period that the debt, or any portion thereof, is disputed, 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 30 days after receiving this notice, this office will provide you the name and address of the original creditor, if different from the current creditor.

Exhibit A.

15. Exhibit A states the following:

Creditor: Citibank, N.A. CITI MASTERCARD Account: XXXXXXXXXXXXX5227 Alltran ID: █████5924 Total Balance as of January 4, 2017: \$2,406.91 Minimum Payment Due as of January 4, 2017: \$882.69 Telephone: 877-614-9420, ext 8613 Partial Account Number for Your Security
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Exhibit A.

16. Exhibit A further states:

We want to help you resolve this account. If you wish to discuss your account, please call James Stauber at 877-614-9420 extension 8613, so we may assist you. As of the date of this letter you owe the amount stated above. Because your account continues to accrue interest and may accrue late and other charges on all owed balances pursuant to your agreement with your creditor, the Total Balance on the date you pay may be greater. If you pay the Total Balance above, an adjustment may be necessary after we receive your payment. If so, we will contact you. For further information about your balance, please call your account representative.

Exhibit A.

17. Exhibit A informed Nolet her total balance, as of January 4, 2017, was \$2,406.91, with a minimum payment due of \$882.69.

18. Exhibit A further informed Nolet “Because your account continues to accrue interest and may accrue late and other charges . . . the Total Balance on the date you may be greater.” Exhibit A.

19. On or about February 8, 2017, Alltran mailed a debt collection letter to Nolet regarding the same alleged debt, allegedly owed to Citibank. A copy of this letter is attached to this complaint as Exhibit B.

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

21. Upon information and belief, Exhibit B is a form debt collection letter used by Defendant to attempt to collect alleged debts.

22. Exhibit B contains the following:

Date: February 8, 2017
Creditor: Citibank, N.A.
CITI MASTERCARD
Account: XXXXXXXXXXXXXXX5227
Alltran ID: ████████5924
Total Balance as of February 8, 2017: \$2,406.91
Telephone: 888-739-0745, ext 4987
Partial Account Number for Your Security

Exhibit B.

23. Exhibit B informed Nolet that, as of February 8, 2017, the balance of her alleged Citibank account was \$2,406.91.

24. On or about February 23, 2017, Alltran mailed a debt collection letter to Nolet regarding the same alleged debt, allegedly owed to Citibank. A copy of this letter is attached to this complaint as Exhibit C.

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

26. Upon information and belief, Exhibit C is a form debt collection letter used by Defendant to attempt to collect alleged debts.

27. Exhibit C contains the following:

Date: February 23, 2017
Creditor: Citibank, N.A.
CITI MASTERCARD
Account: XXXXXXXXXXXXXXX5227
Alltran ID: ████████5924
Total Balance as of February 23, 2017: \$2,406.91
Telephone: 888-739-0745, ext 4987
Partial Account Number for Your Security

Exhibit C.

28. Exhibit C informed Nolet that, as of February 23, 2017, the balance of her alleged Citibank account was \$2,406.91.

29. The balance of Nolet's alleged Citibank account did not change between January 4, 2017, when Defendant sent Exhibit A, and February 23, 2017, when Defendant sent Exhibit C.

30. Nolet did not make any payment to the alleged account between January 4, 2017, when Defendant sent Exhibit A and February 8, 2017, when Defendant sent Exhibit B.

31. Nolet did not make any payment to the alleged account between February 8, 2017, when Defendant sent Exhibit B, and February 23, 2017, when Defendant sent Exhibit C.

32. Upon information and belief, Defendant was not authorized to re-calculate and add interest to Nolet's alleged Citibank account.

33. Upon information and belief, Defendant's statement in Exhibit A that Plaintiff Nolet's account "continues to accrue interest," is a false statement.

34. Upon information and belief, the reference to "Interest" is a threat to add interest to Plaintiff's and Class Members' alleged debts, despite the fact that Alltran was not authorized to do so.

35. Defendant's tactic of threatening to add interest to the alleged debt is a material violation of the FDCPA. *See Hahn v. Triumph P'ships LLC*, 557 F.3d 755, 757-58 (7th Cir. 2009). Defendant's representation that interest continues to accrue encourages the unsophisticated consumer to pay to avoid ever-increasing balances, when in actuality, the balance is not increasing.

36. Plaintiff was confused by Exhibits A-C.

37. Plaintiff had to spend time and money investigating Exhibits A-C, and the consequences of any potential responses to Exhibits A-C.

38. Plaintiff 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 Plaintiff on the consequences of Exhibits A-C.

### THE FDCPA

39. 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).

40. 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”).

41. 15 U.S.C. § 1692e generally prohibits “any false, deceptive, or misleading representation or means in connection with the collection of any debt.”

42. 15 U.S.C. § 1692e(2)(A) specifically prohibits: “The false representation of --- the character, amount, or legal status of any debt.”

43. 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.”

44. 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.”

45. 15 U.S.C. § 1692f generally prohibits a debt collector from using “unfair or unconscionable means to collect or attempt to collect any debt.”

46. 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.

47. 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.

**THE WCA**

48. The Wisconsin Consumer Act (“WCA”) was enacted to protect consumers against unfair, deceptive, and unconscionable business practices and to encourage development of fair and economically sound practices in consumer transactions. Wis. Stat. § 421.102(2).

49. The Wisconsin Supreme Court has favorably cited authority finding that the WCA “goes further to protect consumer interests than any other such legislation in the country,” and is “probably the most sweeping consumer credit legislation yet enacted in any state.” *Kett v. Community Credit Plan, Inc.*, 228 Wis. 2d 1, 18 n.15, 596 N.W.2d 786 (1999) (citations omitted).

50. To further these goals, the Act’s protections must be “liberally construed and applied.” Wis. Stat. § 421.102(1); *see also* § 425.301.



51. “The basic purpose of the remedies set forth in Chapter 425, Stats., is to induce compliance with the WCA and thereby promote its underlying objectives.” *First Wisconsin Nat’l Bank v. Nicolaou*, 113 Wis. 2d 524, 533, 335 N.W.2d 390 (1983). Thus, private actions under the WCA are designed to both benefit consumers whose rights have been violated and also competitors of the violators, whose competitive advantage should not be diminished because of their compliance with the law.

52. To carry out this intent, the WCA provides Wisconsin consumers with an array of protections and legal remedies. The Act contains significant and sweeping restrictions on the activities of those attempting to collect debts. *See* Wis. Stats. § 427.104.

53. The Act limits the amounts and types of additional fees that may be charged to consumers in conjunction with transactions. Wis. Stats. § 422.202(1). The Act also provides injured consumers with causes of action for class-wide statutory and actual damages and injunctive remedies against defendants on behalf of all customers who suffer similar injuries. *See* Wis. Stats. §§ 426.110(1); § 426.110(4)(e). Finally, “a customer may not waive or agree to forego rights or benefits under [the Act].” Wis. Stat. § 421.106(1).

54. Consumers’ WCA claims under Wis. Stat. § 427.104(1) are analyzed using the same methods as claims under the FDCPA. Indeed, the WCA itself requires that the court analyze the WCA “in accordance with the policies underlying a federal consumer credit protection act,” including the FDCPA. Wis. Stat. § 421.102(1).

55. Further, the Wisconsin Supreme Court has held that WCA claims relating to debt collection are to be analyzed under the “unsophisticated consumer” standard. *Brunton v. Nuwell Credit Corp.*, 785 N.W.2d 302, 314-15. In *Brunton*, the Wisconsin Supreme Court explicitly

adopted and followed the “unsophisticated consumer” standard, citing and discussing *Gammon v. GC Servs. Ltd. P’ship*, 27 F.3d 1254, 1257 (7th Cir. 1994). *Id.*

56. Wis. Stat. § 427.104(1)(g) states that a debt collector may not: “Communicate with the customer . . . in such a manner as can reasonably be expected to threaten or harass the customer.”

57. Wis. Stat. § 427.104(1)(h) states that a debt collector may not: “Engage in other conduct which can reasonably be expected to threaten or harass the customer . . . .”

58. Wis. Stat. § 427.104(1)(j) states that a debt collector may not: “Claim, or attempt or threaten to enforce a right with knowledge or reason to know that the right does not exist.”

59. Wis. Stat. § 427.104(1)(L) states that a debt collector may not: “Threaten action against the customer unless like action is taken in regular course or is intended with respect to the particular debt.”

### **COUNT I – FDCPA**

60. Plaintiff incorporates by reference as if fully set forth herein the allegations contained in the preceding paragraphs of this Complaint.

61. The statement in Defendant’s letter that Plaintiff’s account was accruing interest is false, misleading, and confusing.

62. The creditor did not authorize Defendant to add any interest to Plaintiff’s account.

63. Defendant stated the character and amount of Plaintiff’s debt in a misleading way and threatened to add interest even though it did not intend to do so and was not authorized to do so.

64. Defendant violated 15 U.S.C. §§ 1692e, 1692e(2)(A), 1692e(5), 1692e(10), 1692f, 1692f(1), and 1692g.

## **COUNT II – WCA**

65. Plaintiff incorporates by reference as if fully set forth herein the allegations contained in the preceding paragraphs of this Complaint.

66. The statement in Defendant's letter that Plaintiff's account was accruing interest is false, misleading, and confusing.

67. Defendant was not authorized to add any interest to Plaintiff's account.

68. Defendant was not actually adding any interest to Plaintiff's account.

69. Defendant violated Wis. Stat. §§ 427.104(1)(g), 427.104(1)(h), 427.104(j), and 427.104(1)(L).

## **CLASS ALLEGATIONS**

70. Plaintiff brings this action on behalf of a Class consisting of (a) all natural persons in the State of Wisconsin (b) who were sent a collection letter in the form represented by Exhibits A-C to the complaint in this action, (c) seeking to collect a debt for personal, family or household purposes, (d) between November 20, 2017 and November 20, 2017, (e) that was not returned by the postal service.

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

72. 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 the FDCPA and the WCA.

73. Plaintiff's claims are typical of the claims of the Class members. All are based on the same factual and legal theories.

74. Plaintiff will fairly and adequately represent the interests of the Class members. Plaintiff has retained counsel experienced in consumer credit and debt collection abuse cases.

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

**JURY DEMAND**

76. Plaintiff hereby demands a trial by jury.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff requests that the Court enter judgment in favor of Plaintiff 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: November 20, 2017

**ADEMI & O'REILLY, LLP**

By: /S/ Mark A. Eldridge  
John D. Blythin (SBN 1046105)  
Mark A. Eldridge (SBN 1089944)  
Jesse Fruchter (SBN 1097673)  
Ben Slatky (SBN 1106892)  
3620 East Layton Avenue  
Cudahy, WI 53110  
(414) 482-8000  
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meldridge@ademilaw.com  
jfruchter@ademilaw.com  
bslatky@ademilaw.com

# **EXHIBIT A**

PO BOX 4044  
CONCORD CA 94524-4044

# Alltran Financial, LP



January 4, 2017

ADDRESS SERVICE REQUESTED

Creditor: Citibank, N.A.
CITI MASTERCARD
Account: XXXXXXXXXXXX5227
Alltran ID: ██████████5924
Total Balance as of January 4, 2017: \$2,406.91
Minimum Payment Due as of January 4, 2017: \$882.69
Telephone: 877-614-9420, ext 8613
Partial Account Number for Your Security



Loralie A. Nolet  
2432 E RAMSEY AVE  
CUDAHY WI 53110-2403



Alltran Financial, LP  
PO BOX 722910  
HOUSTON TX 77272-2910



Please detach at perforation and return with your payment.

### Your Account has been Referred to this Office for Collection

Please remit the Minimum Payment Due, payable to Citibank, N.A., in the enclosed envelope.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of the debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within the thirty day period that the debt, or any portion thereof, is disputed, 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 30 days after receiving this notice, this office will provide you the name and address of the original creditor, if different from the current creditor.

We want to help you resolve this account. If you wish to discuss your account, please call James Stauber at 877-614-9420 extension 8613, so we may assist you. As of the date of this letter you owe the amount stated above. Because your account continues to accrue interest and may accrue late and other charges on all owed balances pursuant to your agreement with your creditor, the Total Balance on the date you pay may be greater. If you pay the Total Balance above, an adjustment may be necessary after we receive your payment. If so, we will contact you. For further information about your balance, please call your account representative.

**Looking for a secure and more convenient way to pay your account?** Make payments with your Debit Card using your mobile phone or other electronic device at [www.oursecurepayment.com](http://www.oursecurepayment.com) to take advantage of this simple and free service available 24 hours a day.

This communication is from a debt collector. We are required to inform you that this is an attempt to collect a debt, and any information obtained will be used for this purpose.

Sincerely,

James Stauber  
877-614-9420, ext 8613  
Alltran Financial, LP  
P.O. Box 722910  
HOUSTON TX 77272-2910

If you write to us and ask us to stop communicating with you about this debt, we will, but if you owe this debt, you will still owe it and the debt may still be collected from you. If you have a complaint about the way we are collecting this debt, you may write to our Contact Center, 5800 North Course Drive, Houston, TX 77072 or call our toll-free Complaint Hotline at (800) 326-8040 between 7 AM and 4 PM (Central Time) Monday-Friday.
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Telephone: 877-614-9420, ext 8613

Office Hours (all times Central)

Monday-Thursday: 8 AM to 9 PM • Friday: 8 AM to 4 PM • Saturday: 7 AM to 11 AM

PO BOX 4044  
CONCORD CA 94524-4044

# Alltran Financial, LP

Enero 4, 2017

ADDRESS SERVICE REQUESTED

Acreeador: Citibank, N.A.
CITI MASTERCARD
Cuenta: XXXXXXXXXXXXX5227
Alltran ID: ██████████5924
Saldo Total a partir de Enero 4, 2017: \$2,406.91
Pago Mínimo Requerido a partir de Enero 4, 2017: \$882.69
Para asistencia en español llame: (800) 354-4150 Ext. 8803
Número parcial de cuenta para su seguridad



Loralie A. Nolet  
2432 E RAMSEY AVE  
CUDAHY WI 53110-2403



Alltran Financial, LP  
PO BOX 722910  
HOUSTON TX 77272-2910



Por favor destacar al perforación y retomar con su pago.

Su Cuenta ha sido Turnada a esta Oficina para su Cobranza

Por favor envíe el Pago Mínimo Requerido, a nombre de Citibank, N.A., en el sobre adjunto.

A menos que usted nos notifique que cuestiona la validez de esta deuda, o alguna parte de ella, dentro de los 30 días siguientes a partir de la recepción de este aviso, entenderemos que la deuda es válida. Si usted nos notifica por escrito, dentro de los siguientes treinta días a partir de la recepción de este aviso, que usted cuestiona la validez de la deuda o cualquier parte de ella, entonces conseguiremos la verificación de la deuda o una copia de un fallo judicial y le enviaremos por correo postal una copia de dicho fallo o verificación. Si usted nos lo solicita por escrito, dentro de los siguientes 30 días a partir de la recepción de este aviso, nosotros le proporcionaremos el nombre y la dirección del acreedor original, de ser diferente al acreedor actual.

Queremos ayudarle a resolver su deuda. Si usted desea conversar con nosotros sobre su cuenta, por favor llame a James Stauber, al número (800) 354-4150 Ext. 8803, para poder ayudarle. Al momento de la fecha de esta carta, usted debe la cantidad indicada arriba. Dado que los intereses siguen creciendo en su cuenta, y además puede acumular cargos por pagos vencidos y otros cargos sobre todo el saldo debido, de conformidad con su acuerdo con su acreedor, el Saldo Total puede ser mayor en la fecha en que usted pague. Si paga el Saldo Total indicado arriba, es posible que sea necesario hacer un ajuste después de recibir su pago. De ser así, nos pondremos en contacto con usted. Para mayor información sobre su saldo, por favor llame a su representante de cuenta.

**¿Está usted en busca de una forma segura y más conveniente de pagar su cuenta?** Haga pagos con su Tarjeta de Débito usando su teléfono móvil u otro dispositivo electrónico en [www.oursecurepayment.com](http://www.oursecurepayment.com) para aprovechar este servicio simple y gratuito a su disposición las 24 horas del día.

Esta comunicación se la envía una agencia de cobranzas. Se nos requiere que le informemos que éste es un intento para cobrar una deuda, y cualquier información que se obtenga se usará con este propósito.

Atentamente  
James Stauber  
(800) 354-4150 Ext. 8803  
Alltran Financial, LP  
P.O. Box 722910  
HOUSTON TX 77272-2910  
Teléfono: (800) 354-4150 Ext. 8803

Si usted nos escribe y nos solicita que dejemos de comunicarnos con usted sobre esta deuda, lo haremos, pero si usted la debe, aún así la seguirá debiendo, y se le puede cobrar. Si usted tiene alguna queja en relación a la manera en que estamos cobrando esta deuda, usted puede escribir a nuestro Contact Center, 5800 North Course Drive, Houston, TX 77072 o llamar gratuitamente a nuestra línea Complaint Hotline al (800) 326-8040 entre las 7:00 AM y las 4:00 PM (Hora del Centro) de lunes a viernes.
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Horas de Oficina (todas horas en Central)

lunes - jueves: 8 am a 9 pm • viernes: 8 am a 4 pm • sábado: 7 am a 11 am

# Exhibit B



PO BOX 4044  
CONCORD CA 94524-4044

**Alltran Financial, LP**



February 8, 2017

ADDRESS SERVICE REQUESTED



Loralie A. Nolet  
2432 E RAMSEY AVE  
CUDAHAY WI 53110-2403



Date: February 8, 2017  
Creditor: Citibank, N.A.  
CITI MASTERCARD  
Account: XXXXXXXXXXXXX5227  
Alltran ID: [REDACTED] 5924  
Total Balance as of February 8, 2017: \$2,406.91  
Telephone: 888-739-0745, ext 4987  
Partial Account Number for Your Security

Alltran Financial, LP  
PO BOX 722910  
HOUSTON TX 77272-2910



Please detach at perforation and return with your payment.

**SETTLEMENT OFFER**

Our client, the above named creditor, has agreed to accept \$842.42 as a settlement for monies owing on your account. Payment must be received by this office within 15 days of the postmark of this letter to accept this offer. Please make your payment payable to Citibank, N.A.. We are not obligated to renew this offer.

If you are unable to take advantage of this settlement offer, our client has asked us to negotiate with you to resolve this debt. We would like to arrange repayment terms with you based on your individual circumstances.

Please call our toll-free telephone number to confirm your interest in this settlement offer or to explain your circumstances. We WILL work with you. You can call James Stauber at our toll-free number at 888-739-0745, extension 4987. We look forward to helping you resolve this account.

This communication is from a debt collector. We are required to inform you that this is an attempt to collect a debt, and any information obtained will be used for this purpose.

Sincerely,

James Stauber, ext 4987  
Alltran Financial, LP  
P.O. Box 722910  
HOUSTON TX 77272-2910

Creditor: Citibank, N.A.  
CITI MASTERCARD  
Account: XXXXXXXXXXXXX5227  
Alltran ID: [REDACTED] 5924  
Total Balance as of February 8, 2017: \$2,406.91  
Telephone: 888-739-0745, ext 4987  
Partial Account Number for Your Security

Office Hours (all times Central)

Monday-Thursday: 8 AM to 9 PM • Friday: 8 AM to 4 PM • Saturday: 7 AM to 11 AM

PO BOX 4044  
CONCORD CA 94524-4044

# Alltran Financial, LP



Febrero 8, 2017

ADDRESS SERVICE REQUESTED



Loralie A. Nolet  
2432 E RAMSEY AVE  
CUDAHY WI 53110-2403

Fecha: Febrero 8, 2017  
Acreedor: Citibank, N.A.  
CITI MASTERCARD  
Cuenta: XXXXXXXXXXXXX5227  
Alltran ID: [REDACTED] 5924  
Saldo Total a partir de Febrero 8, 2017: \$2,406.91  
Para asistencia en español llame: (800) 354-4150 Ext. 8803  
Número parcial de cuenta para su seguridad

Alltran Financial, LP  
PO BOX 722910  
HOUSTON TX 77272-2910



Por favor destacar al perforación y retornar con su pago.

## OFRECIMIENTO DE LIQUIDACIÓN

Nuestro cliente, cuyo nombre aparece arriba, ha aceptado 842.42 como liquidación de la cantidad debida en su cuenta. Nosotros debemos recibir el pago dentro de los siguientes 15 días posteriores a la fecha del matasellos de esta carta, para aceptar este ofrecimiento. Por favor, haga su pago a nombre de Citibank, N.A.. Nosotros no estamos obligados a renovar este ofrecimiento.

Si usted no puede aprovechar este ofrecimiento de liquidación, nuestro cliente nos ha solicitado que lleguemos a un acuerdo con usted para resolver esta deuda. Nos gustaría negociar con usted los términos de repago -- basados en su situación personal.

Por favor llame a nuestro número gratuito para confirmar su interés en este ofrecimiento de liquidación o para explicarnos su situación. Podemos encontrar una solución JUNTOS. Usted puede llamar a James Stauber gratuitamente al (800) 354-4150 Ext. 8803. Descamos ayudarle a resolver esta deuda.

Esta comunicación se la envía una agencia de cobranzas. Se nos requiere que le informemos que éste es un intento para cobrar una deuda, y cualquier información que se obtenga se usará con este propósito.

Atentamente

Para asistencia en español llame:  
(800) 354-4150 Ext. 8803  
Alltran Financial, LP  
P.O. Box 722910  
HOUSTON TX 77272-2910

Acreedor: Citibank, N.A.  
CITI MASTERCARD  
Cuenta: XXXXXXXXXXXXX5227  
Alltran ID: [REDACTED] 5924  
Saldo Total a partir de Febrero 8, 2017: \$2,406.91  
Para asistencia en español llame: (800) 354-4150 Ext. 8803

Horas de Oficina (todas horas en Central)  
lunes - jueves: 8 am a 9 pm • viernes: 8 am a 4 pm • sábado: 7 am a 11 am

# Exhibit C

PO BOX 4044  
CONCORD CA 94524-4044

**Alltran Financial, LP**



February 23, 2017

ADDRESS SERVICE REQUESTED

Date: February 23, 2017  
Creditor: Citibank, N.A.  
CITI MASTERCARD  
Account: XXXXXXXXXXXX5227  
Alltran ID: [REDACTED] 5924  
Total Balance as of February 23, 2017: \$2,406.91  
Telephone: 888-739-0745, ext 4987  
Partial Account Number for Your Security



Loralie A. Nolet  
2432 E RAMSEY AVE  
CUDAHY WI 53110-2403



**SETTLEMENT OFFER**  
**\$842.42 IN 3 PAYMENTS**

Our client Citibank, N.A. is offering you a settlement of \$842.42 in 3 payments over 3 months starting on March 10, 2017. Once all 3 payments of \$280.81 each have been paid to our office on time, we will consider this account to be settled for less than the full balance owed. Please make your payment payable to Citibank, N.A..

This offer is only valid if the payment schedule is met. If the payment schedule is not met, we are not obligated to renew this offer. If the settlement is cancelled any payments already received will be credited towards the full balance. Please send in your payments along with the payment stub to the address listed on the coupon.

Please call our toll-free number, 888-739-0745 to confirm your interest in the settlement offer or to explain your circumstances.

Sincerely,  
James Stauber ext. 4987

This communication is from a debt collector. We are required to inform you that this is an attempt to collect a debt, and any information obtained will be used for that purpose.

Office Hours (all times Central)  
Monday-Thursday: 8 AM to 9 PM • Friday: 8 AM to 4 PM • Saturday: 7 AM to 11 AM

¡Traducción en español al lado reverso!

**Detach Coupon and Mail with Payment**

**Payment 1 of 3**



**Payment 2 of 3**



**Payment 3 of 3**

**Alltran ID: [REDACTED] 5924**  
Mail Payment To:  
Alltran Financial, LP  
P.O. Box 722910  
HOUSTON TX 77272-2910

**Alltran ID: [REDACTED] 5924**  
Mail Payment To:  
Alltran Financial, LP  
P.O. Box 722910  
HOUSTON TX 77272-2910

**Alltran ID: [REDACTED] 5924**  
Mail Payment To:  
Alltran Financial, LP  
P.O. Box 722910  
HOUSTON TX 77272-2910

Payment Amt - \$280.81  
Due Date - March 10, 2017

Payment Amt - \$280.81  
Due Date - April 09, 2017

Payment Amt - \$280.81  
Due Date - May 09, 2017

PO BOX 4044  
CONCORD CA 94524-4044

# Alltran Financial, LP



23 de febrero de 2017

ADDRESS SERVICE REQUESTED



Loralie A. Nolet  
2432 E RAMSEY AVE  
CUDAHY WI 53110-2403



Fecha: Febrero 23, 2017  
Acreedor: Citibank, N.A.  
CITI MASTERCARD  
Cuenta: XXXXXXXXXXXXX5227  
Alltran ID: █████5924  
Saldo Total a partir de Febrero 23, 2017: \$2,406.91  
Para asistencia en español llame: (800) 354-4150 Ext. 8803  
Número parcial de cuenta para su seguridad

## OFRECIMIENTO DE LIQUIDACIÓN \$842.42 EN 3 PAGOS

Nuestro cliente Citibank, N.A. le está ofreciendo un acuerdo de liquidación por \$842.42 en 3 pagos en un periodo de 3 meses a comenzar el Marzo 10, 2017. Una vez que todos y cada uno de los 3 pagos de \$280.81 hayan sido hechos a tiempo a nuestra oficina, nosotros consideraremos que esta cuenta estará liquidada por menos del saldo total adeudado. Por favor haga su pago a nombre de Citibank, N.A..

Este ofrecimiento es válido solo si se cumple con el plan de pagos. Si no se cumple con el plan de pagos, nosotros no estamos obligados a renovar este ofrecimiento. Si el acuerdo es cancelado, cualquier pago que se haya recibido será acreditado al saldo total. Por favor, envíe sus pagos junto con el talón de pago a la dirección que aparece en el cupón.

Por favor, llame a nuestro número gratuito (800) 354-4150 Ext. 8803 para confirmar su interés en el ofrecimiento de liquidación o para explicar su situación.

Atentamente  
James Stauber  
(800) 354-4150 Ext. 8803

Esta comunicación se la envía una agencia de cobranzas. Se nos requiere que le informemos que éste es un intento para cobrar una deuda, y cualquier información que se obtenga se usará con este propósito.

Horas de Oficina (todas horas en Central)  
lunes - jueves: 8 am a 9 pm • viernes: 8 am a 4 pm • sábado: 7 am a 11 am

English text on other side!

**Desprenda el cupón y envíelo junto con su pago.**

**Pago 3 de 3**



**Pago 2 de 3**



**Pago 1 de 3**

**Alltran ID: █████5924**  
Envíe su pago a:  
Alltran Financial, LP  
P.O. Box 722910  
HOUSTON TX 77272-2910

**Alltran ID: █████5924**  
Envíe su pago a:  
Alltran Financial, LP  
P.O. Box 722910  
HOUSTON TX 77272-2910

**Alltran ID: █████5924**  
Envíe su pago a:  
Alltran Financial, LP  
P.O. Box 722910  
HOUSTON TX 77272-2910

Cantidad a pagar - \$280.81  
Fecha Límite: Mayo 9, 2017

Cantidad a pagar - \$280.81  
Fecha Límite: Abril 9, 2017

Cantidad a pagar - \$280.81  
Fecha Límite: Marzo 10, 2017

# 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

LORALIE NOLET

(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

ALLTRAN FINANCIAL LP

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)

- |   |                            |                            |  |                            |                            |
|---|----------------------------|----------------------------|--|----------------------------|----------------------------|
|   | <b>PTF</b>                 | <b>DEF</b>                 |  | <b>PTF</b>                 | <b>DEF</b>                 |
| 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	<b>PERSONAL INJURY</b>	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 620 Other Food & Drug	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<b>PROPERTY RIGHTS</b>	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 630 Liquor Laws	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 650 Airline Regs.	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 660 Occupational Safety/Health	<b>SOCIAL SECURITY</b>	<input checked="" type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<b>LABOR</b>	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 810 Selective Service
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 850 Securities/Commodities/Exchange
<input type="checkbox"/> 195 Contract Product Liability		<input type="checkbox"/> 720 Labor/Mgmt. Relations	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 875 Customer Challenge 12 USC 3410
<input type="checkbox"/> 196 Franchise		<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 890 Other Statutory Actions
<b>REAL PROPERTY</b>	<b>CIVIL RIGHTS</b>	<input type="checkbox"/> 740 Railway Labor Act	<b>FEDERAL TAX SUITS</b>	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 892 Economic Stabilization Act
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing/Accommodations	<b>IMMIGRATION</b>		<input type="checkbox"/> 894 Energy Allocation Act
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 462 Naturalization Application		<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 463 Habeas Corpus - Alien Detainee		<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 465 Other Immigration Actions		<input type="checkbox"/> 950 Constitutionality of State Statutes
	<input type="checkbox"/> 440 Other Civil Rights			
		<b>PRISONER PETITIONS</b>		
		<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

SIGNATURE OF ATTORNEY OF RECORD

November 20, 2017

s/ Mark A. Eldridge

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFF \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

## 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

LORALIE NOLET,

Plaintiff(s)

v.

ALLTRAN FINANCIAL LP,

Defendant(s)

Civil Action No. 17-cv-1611

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) ALLIANCE COLLECTION AGENCIES INC.
c/o C T CORPORATION SYSTEM
301 S. BEDFORD ST. SUITE 1
MADISON, WISCONSIN 53703

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:

Mark A. Eldridge
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-1611

**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: [Woman Sues Alltran Financial Alleging False Statement in Collection Letter](#)

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