

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

CASE NO. _____

JOHN NORTHRUP, Individually and on behalf
of a Class of Similarly Situated Individuals,

Plaintiff,

vs.

RAY SCOTT RISTER; COMPLIANCE
EDUCATORS, LLC; and DOT COMPLIANCE
GROUP, LLC,

Defendants.

CLASS ACTION COMPLAINT

Plaintiff John Northrup, on behalf of himself and all others similarly situated, alleges and avers as follows:

INTRODUCTION

1. Plaintiff brings this Class Action Complaint for damages, injunctive relief, and any other available legal or equitable remedies, resulting from the illegal actions of Roy Scott Rister; Compliance Educators, LLC; and DOT Compliance Group, LLC (“Defendants”), in negligently, and/or willfully contacting Plaintiff through SMS or “text” messages on Plaintiff’s cellular telephone, in violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.*, (“TCPA”), thereby invading Plaintiff’s privacy. Plaintiff alleges as follows upon personal knowledge as to his own acts and experiences, and, as to all other matters, upon information and belief, including investigation conducted by his attorneys.

PARTIES

2. Plaintiff John Northrup is an individual who resides in Hillsborough County, Florida.

3. Defendant RAY SCOTT RISTER (also known as Scott Rister) is an individual who resides at 134 Taylors Bend, Haughton, Louisiana, 71037.

4. Defendant COMPLIANCE EDUCATORS, LLC is a Louisiana limited liability company that can be served through its registered agent for service, Ray Scott Rister, at its registered address, 134 Taylors Bend, Haughton, Louisiana, 71037.

5. Defendant DOT COMPLIANCE GROUP, LLC is a Louisiana limited liability company, formed on July 15, 2013, that can be served through its registered agent for service, Ray Scott Rister, at its registered address, 134 Taylors Bend, Haughton, Louisiana, 71037.

JURISDICTION AND VENUE

6. This Court has jurisdiction over this action and all the Defendants pursuant to 28 U.S.C. § 1331 in that this action arises under a United States federal statute, specifically the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.*, (“TCPA”). The TCPA specifically authorizes this Court to exercise jurisdiction.

7. Jurisdiction is also proper under 28 U.S.C. § 1332(d)(2) because Plaintiff seeks up to \$1,500 in damages for each text message in violation of the TCPA, which, when aggregated among a proposed class number of more than five thousand, exceeds the \$5,000,000 threshold for federal court jurisdiction. Further, Plaintiff allege a national class, which will result in at least one class member belonging to a different state than that of Defendants, providing jurisdiction under

28 U.S.C. Section 1332(d)(2)(A). Therefore, both elements of diversity jurisdiction under the Class Action Fairness Act of 2005 (“CAFA”) are present, and this Court has jurisdiction.

8. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(1) and/or (b)(2) because a substantial part of the events or omissions giving rise to this claim occurred in this District, and because Defendants target residents of this District with their unsolicited and unlawful text messages.

GENERAL ALLEGATIONS

9. Defendant Ray Scott Rister (“Rister”) is the sole owner, operator and controlling person for Defendants Compliance Educators, LLC, and DOT Compliance Group, LLC. Rister and his company own and operate the website, www.ExpressDOTService.com. Because Rister and his companies all operate as a single entity, they are referred to herein collectively as Defendants.

10. Defendants made the deliberate decision to engage in bulk marketing by sending truckers like the Plaintiff, John Northrup, advertisements through Short Message Services and faxes. The term “Short Message Service” or “SMS” is a messaging system that allows cellular telephone subscribers to use their cellular telephones to send and receive short text messages.

11. Defendants have continued this practice despite repeated complaints. Defendant Compliance Educators, LLC has an “F” rating from the Better Business Bureau (“BBB”). According to the BBB’s website:

On September 26, 2011, we were contacted by Tonya Strahan, Office Manager for Compliance Educators. She gave her direct line as 318-670-8950. We explained our concerns regarding the compliance training flyer being mailed/faxed to trucking companies and how the wording in the flyers appears to be misleading in regards to the DOT. We suggest that you check with the DOT in your state to find out exactly what training is required. This business may be operating under the name

of DOT Compliance Group.

Due to a pattern of complaints and no response from the business, consumers should refer their complaints to the following agency:

Louisiana Office of the Attorney General 225-326-6465 1-800-351-4889 P.O. Box 94005 Baton Rouge, LA 70804, ConsumerInfo@ag.state.la.us

12. The BBB's website states that, "BBB attempted to bring the issue of pattern of complaints to the attention of the business. The business failed to respond to the BBB." According to the BBB's website:

On January 15, 2015, BBB files indicate that this business has a pattern of complaints concerning Sales Practice/Advertising issues.

Consumer's complaints state that this business continuously contacts the business by mail, fax, email and phone texts to notify them that they are in violation of their US DOT #, and that their company is going to be fined for non-compliance. This business offers compliance training.

13. The BBB website lists the following additional complaints against Defendants:

(1) 01/15/2015

I am tired of being harassed and threatened with fines if we don't take their training. This company is constantly faxing, emailing, texting my cell phone and mailing me notices that I am in violation of my US DOT #, and that my company is going to be fined for non-compliance. I have contacted the FMCSA and they assure me this is not the case. I have told this Compliance Educators company numerous times to leave me alone and they still continue.

I want them to leave me alone. To stop telling people they are going to be fined if not in Compliance by not taking there online training. For new people in the trucking business that doesn't know any better, they end up buying their product, that is NOT required by FMCSA.

(2) 01/12/2015

Continually text messaging my cell with services I do not need. After texting back, they persist with more texts. Their website offers no phone number. On 10/15/14 I was contacted via text message by this company who insists that I use their services in which I do not need. On the same day, minutes later, I messaged them stating

that if I receive another text again then legal action will be taken to get them to cease and desist. They messaged again on 12/18/14 and once again today 12/22/14. I messaged them via their website <http://www.complianceeducators.com/contact> In the message I stated the information I mentioned above. I also tried to call the phone number not found on their site but through the better business bureau. I left a message saying to remove my company's information from their database and to never contact me again in any way shape or form. They are a company trying to sell compliance information which I already have access too> i'm based in oregon and I own a trucking company which is always up to date and current with all state and federal regulations and I do not need the help of Compliance Educators, LLC. They have become very bothersome and their text messages are costing me money. Thanks for your help.

I wish for them to stop all forms of contact to me, my business and/or my employee(s).

(3) 06/29/2016

Texting to my personal cell phone false information on keeping my driver's license. This number is registered on the Do Not Call registry No phone number on their web site. to unsubscribe they ask for more personal information which is probably used to harvest more ways to spam. Found the telephone number on this site. I called and the man that answered was rude, asked me if I had a drug or alcohol problem and if that is why I am calling. I asked him to place my number on their Do Not Call list and to stop texting. He immediately hung up.

Get them to stop using illegal advertising by texting to numbers not wishing their contact.

(4) 06/29/2016

This company send out text messages that say that it is MANDATORY to by FEDERAL LAW that we HAVE TO purchase and go through their classes.

If the BBB could hunt, find and destroy this and these companies, THAT WOULD BE THE BEST RESULT.

(5) 06/28/2016

Federal Regulations require a phone number on unsolicited faxes sent in order to opt out. The "marketing" fax junk mail they sent does not.

Remove us from your fax AND comply with Federal Regulations immediately.

(6) 01/04/2016

I have sent repeated requests to be REMOVED from their mass fax advertising, which they have not complied with at all.

We receive on at least a monthly basis that we have to perform MANDATORY DOT SUPERVISOR COMPLIANCE

TRAINING. For ONLY \$99 they will make sure we are properly trained. We do not do and will not do business with this company. We have sent repeated requests (their email address DOES NOT work) via fax to REMOVE us from their contact list PERMANENTLY. They ignore us.

Please contact Compliance Educators LLC to have them permanently remove us from their contact list, via email, fax or phone. We DO NOT want any contact from them.

We DO NOT want any contact from this entity, in any way, shape or form

14. An “SMS message” is a text message directed to a wireless device through the use of the telephone number assigned to the device. For purposes of the Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq., (“TCPA”), a text message is considered to be a call. *See Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket No. 02-278, Report and Order, 18 FCC Rcd 14014, 14115, ¶ 165 (2003) (“2003 TCPA Order”).

15. When an SMS or “text” message call is successfully made, the recipient’s cell phone rings or otherwise notifies the recipient of the text message that a text message is being received.

16. As cellular telephones are inherently mobile and are carried by their owners at all times, text messages are received by the called party virtually anywhere.

17. Unlike standard advertising methods, bulk advertising by use of text messages cost recipients money, because cell phone users typically pay for the text messages they receive, either individually, or in bulk.

18. Over the course of an extended period beginning no later than in 2015, Defendants and their agents directed the mass transmission of text messages to the cell phones of persons they hoped were potential customers of Defendants' services.

19. On October 3, 2016, at 12:03 pm, Plaintiff received the following unsolicited SMS or "text" message to his wireless phone:

FRM: Compliance Notification
MSG: DOT #1186534
ANGIE'S TRANSPORTATION, INC,
Your annual UCR fee is due immediately
regarding your DOT compliance:
www.ExpressDotService.com/nd/MSSOMDM1NgEA

20. On November 22, 2016, at 12:24 pm, Plaintiff received the following unsolicited SMS or "text" message to his wireless phone:

FRM: Compliance Notification
SUBJ: DOT Notification
MSG: [1/2] DOT #1186534
ANGIE'S TRANSPORTATION, INC,
Your annual UCR fee is due immediately
Regarding your DOT compliance:
www.ExpressDotService.com/nd/MSSOMDM1NgEA

21. The website listed in the text, www.ExpressDotService.com is maintained by Defendants.

22. Plaintiff provided no consent to receive these text messages, which were sent by Defendants in an effort to promote the sale of their services to truck drivers.

23. These unsolicited text messages placed to Plaintiff's cellular telephone were placed via an "automatic telephone dialing system," ("ATDS") as defined by 47 U.S.C. § 227 (a)(1).

24. "The term 'unsolicited advertisement' means any material advertising the commercial availability or quality of any property, goods, or services which is transmitted to any person without that person's prior express invitation or permission, in writing or otherwise." 47 U.S.C. § 227 (a)(5).

25. "The term 'telephone solicitation' means the initiation of a . . . message for the purpose of encouraging the purchase . . . of . . . services, which is transmitted to any person, but such term does not include a call or message (A) to any person with that person's prior express invitation or permission, (B) to any person with whom the caller has an established business relationship, or (C) by a tax exempt nonprofit organization." 47 U.S.C. § 227 (a)(4).

26. The telephone numbers that the Defendants, or their agents, sent the text messages to were assigned to cellular telephone services pursuant to 47 U.S.C. § 227(b)(1)(A)(iii).

27. These telephone text messages constituted "calls" under the TCPA that were not for emergency purposes as defined by 47 U.S.C. § 227 (b)(1)(A)(i) and applicable regulations which make clear that texts are included within the TCPA.

28. Plaintiff did not provide Defendants or their agents prior express consent to receive unsolicited text messages pursuant to 47 U.S.C. § 227 (b)(1)(B).

29. These text messages by Defendants or their agents therefore violated 47 U.S.C. § 227(b)(1).

30. Plaintiff, John Northrup, has standing to bring these claims because Defendants' violation of the TCPA resulted in a concrete and particularized injury to him, in the form of

invasion of privacy, unwanted and unauthorized text messages received by his cell phone, which caused wasted time addressing unwanted text messages, unwarranted distraction from his work activities (including driving large trucks, and loading and unloading products), aggravation and distress, unavailability of his cell phone when it was receiving unauthorized text messages, depletion of his cell phone's battery and the resulting cost to recharge the phone, and potential financial loss in the form of increased charges from his cell phone carrier.

CLASS ACTION ALLEGATIONS

31. Plaintiff brings this action on behalf of himself and on behalf of all others similarly situated ("the Class").

32. Plaintiff represents, and is a member of the Class, consisting of: all persons within the United States who received an unsolicited SMS or text message from a Defendant, or an agent of a Defendant, on a paging service, cellular phone service, or other service for which they were charged for the SMS or text messages, through the use of any automatic telephone dialing system as set forth in 47 U.S.C. Section 227(B)(1)(A)(3) or artificial or prerecorded voice, which SMS or text messages by a Defendant (or agent of a Defendant) was not made for emergency purposes or with the recipients' prior express consent, within the four years prior to the filing of this Complaint.

33. Defendants and their employees or agents are excluded from the Class.

34. Plaintiff does not know the number of members in the Class, but believes the Class members number in the thousands, if not more. Thus, this matter should be certified as a Class action to assist in the expeditious litigation of this matter.

35. Plaintiff and members of the Class were harmed by the acts of Defendants in at least the particularized and concrete ways set forth in Paragraph 31 above.

36. This suit seeks only statutory damages and injunctive relief on behalf of the Class, and it expressly is not intended to request any recovery for personal injury and claims related thereto.

37. The joinder of the Class members is impractical and the disposition of their claims in the Class action will provide substantial benefits both to the parties and to the court.

38. The Class can be identified through Defendants' records or Defendants' agents' records.

39. There is a well-defined community of interest in the questions of law and fact involved affecting the parties to be represented.

40. The questions of law and fact to the Class predominate over questions which may affect individual Class members, including the following:

- a. Whether, within the four years prior to the filing of this Complaint, Defendants or their agents placed cellular telephone SMS or text messages for purposes of soliciting new customers without the recipients' prior express consent;
- b. What systems and methodologies were used to collect the cell phone numbers, and send the text messages at issue in this case;
- c. Whether the systems used to place the cellular telephone SMS or text messages constituted automatic telephone dialing systems under the TCPA;
- d. Whether Defendants' violation of the TCPA was willful or knowing, such that the award should be increased up to three times pursuant to 47 USC §227(b)(3)(c); and
- e. Whether Defendants and their agents should be enjoined from engaging in such conduct in the future.

41. As a person who received at least one unsolicited telephone SMS or text message without his prior express consent, Plaintiff is asserting claims that are typical of the Class.

42. Plaintiff will fairly and adequately represent and protect the interests of the Class in that Plaintiff has no interests antagonistic to any member of the Class.

43. Plaintiff and the members of the Class have all suffered irreparable harm as a result of the Defendants' unlawful and wrongful conduct.

44. Absent a class action, the Class will continue to face the potential for irreparable harm. In addition, these violations of law will be allowed to proceed without remedy and Defendants will likely continue such illegal conduct.

45. Because of the size of the individual Class member's claims, few, if any, Class members could not afford to individually seek legal redress for the wrongs complained of herein.

46. Plaintiff has retained counsel experienced in handling class action claims of this nature.

47. A class action is a superior method for the fair and efficient adjudication of this controversy.

48. Class-wide damages are essential to induce Defendants to comply with federal law.

49. The interest of Class members in individually controlling the prosecution of separate claims against Defendants is small because the maximum statutory damages in an individual action for violation of the TCPA are minimal. Management of these claims is likely to present significantly fewer difficulties than those presented in many individual claims.

50. Defendants have acted on grounds generally applicable to the Class, thereby making appropriate final injunctive relief and corresponding declaratory relief with respect to the Class as a whole.

51. The members of the Class are capable of being readily ascertained from the information and records in the possession or control of Defendants.

52. The Class members are so numerous that individual joinder of all members is impractical.

53. Plaintiff's claims are typical of those of the Class and are based on the same legal and factual theories.

54. Plaintiff and his counsel will fairly and adequately represent and protect the interests of the Class. Plaintiff has been subject to the same unlawful acts as the rest of the Class members and is ready, willing and able to serve as a Class representative. Moreover, Plaintiff's counsel are experienced in handling complex litigation, and have extensive class action experience and a long track record of successful prosecution of class action cases. Neither Plaintiff nor his counsel has any interest that might cause them not to vigorously pursue this action.

55. Certification of a Class under Fed. R. Civ. P. 23(b)(3) is appropriate in that Plaintiff and the Class members seek liquidated statutory monetary damages, common questions predominate over any individual questions, and a class action is superior for the fair and efficient adjudication of this controversy. A class action will cause an orderly and expeditious administration of the Class members' claims and economies of time, effort and expense will be fostered and uniformity of decisions will be ensured. Moreover, the individual Class members are

unlikely to be aware of their rights and not in a position (either through experience or financially) to commence individual litigation against Defendants.

56. Alternatively, certification of a class is appropriate under Fed. R. Civ. P. 23(b)(1), in that inconsistent or varying adjudications with respect to individual members of the Class would establish incompatible standards of conduct for Defendants or adjudications with respect to individual members of the Class as a practical matter would be dispositive of the interests of the other members not parties to the adjudications or would substantially impair or impede their ability to protect their interests.

57. Alternatively, certification of a class is appropriate under Fed. R. Civ. P. 23(b)(2) because the parties opposing the Class have acted or refused to act on grounds generally applicable to the Class, thereby making final injunctive relief appropriate respecting the Class as a whole.

FIRST CAUSE OF ACTION
NEGLIGENT VIOLATIONS OF THE
TELEPHONE CONSUMER PROTECTION ACT 47 U.S.C. § 227 ET SEQ

58. Plaintiff incorporates by reference all of the above paragraphs 1-58 of this Complaint as though fully stated herein.

59. Each such text message call was made using equipment that, upon information and belief, had the capacity to store or produce telephone numbers to be called, using a random or sequential number generator, or a system that otherwise qualified as an automatic telephone dialing system under the TCPA. By using such equipment, Defendants were able to effectively send thousands of text messages simultaneously to lists of thousands of wireless phone numbers of consumers without human intervention. These text messages were sent without the prior express consent of the Plaintiff and the other members of the Class to receive such text messages.

60. The foregoing acts and omissions of Defendants and their agents constitute numerous and multiple negligent violations of the TCPA, including but not limited to each and every one of the above-cited provisions of 47 U.S.C. § 227 *et seq.* As a result of Defendants', and Defendants' agents', negligent violations of 47 U.S.C. § 227 *et seq.*, Plaintiff and the Class are entitled to an award of \$500.00 each in statutory damages, for each and every violation, pursuant to 47 U.S.C. § 227(b)(3)(B). Plaintiff and the Class are also entitled to and seek injunctive relief prohibiting such conduct in the future.

WHEREFORE, Plaintiff respectfully requests the Court grant Plaintiff and the Class members the following relief against Defendants:

a. As a result of Defendants,' and Defendants' agents,' negligent violations of 47 U.S.C. § 227(b)(1), Plaintiff seeks for himself and each Class member \$500.00 in statutory damages, per violation, pursuant to 47 U.S.C. § 227(b)(3)(B).

b. Pursuant to 47 U.S.C. § 227(b)(3)(A), Plaintiff seeks injunctive relief prohibiting such conduct in the future.

c. As a result of Defendants,' and Defendants' agents,' willful and/or knowing violations of 47 U.S.C. § 227(b)(1), Plaintiff seeks for himself and each Class member increased damages, as provided by statute, up to \$1,500.00 per violation, pursuant to 47 U.S.C. § 227(b)(3)(B) and 47 U.S.C. § 227(b)(3)(C).

d. Pursuant to 47 U.S.C. § 227(b)(3)(A), injunctive relief prohibiting such conduct in the future.

e. Any other relief the Court may deem just and proper.

SECOND CAUSE OF ACTION
KNOWING AND/OR WILLFUL VIOLATIONS OF THE
TELEPHONE CONSUMER PROTECTION ACT 47 U.S.C. § 227 ET SEQ.

61. Plaintiff incorporates by reference all of the above paragraphs 1-60 of this Complaint as though fully stated herein.

62. Upon information and belief, Defendants violations of the TCPA were willful and/or knowing. Accordingly, Plaintiff and the Class are entitled to have their awards increased to an amount not more than three times the \$500 liquidated damages amount, or \$1,500.00 per violation, pursuant to 47 U.S.C. § 227(b)(3)(B and C).

WHEREFORE, Plaintiff respectfully requests the Court grant Plaintiff and the Class members the following relief against Defendants: As a result of Defendants', and Defendants' agents', willful violations of 47 U.S.C. § 227(b)(1), Plaintiff seeks for himself and each Class member \$1,500.00 in statutory damages, per violation, pursuant to 47 U.S.C. § 227(b)(3)(B).

f. Pursuant to 47 U.S.C. § 227(b)(3)(A), Plaintiff seeks injunctive relief prohibiting such conduct in the future.

g. As a result of Defendants,' and Defendants' agents,' willful and/or knowing violations of 47 U.S.C. § 227(b)(1), Plaintiff seeks for himself and each Class member increased damages, as provided by statute, up to \$1,500.00 per violation, pursuant to 47 U.S.C. § 227(b)(3)(B) and 47 U.S.C. § 227(b)(3)(C).

h. Pursuant to 47 U.S.C. § 227(b)(3)(A), injunctive relief prohibiting such conduct in the future.

i. Any other relief the Court may deem just and proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all issues so triable.

Dated: March 3, 2017

Respectfully submitted,

/s/ Seth M. Lehrman

Seth M. Lehrman (Fla. Bar No. 132896)

E-mail: seth@pathtojustice.com

FARMER, JAFFE, WEISSING,

EDWARDS FISTOS & LEHRMAN, P.L.

425 North Andrews Avenue, Suite 2

Fort Lauderdale, FL 33301

Telephone: (954) 524-2820

Facsimile: (954) 524-2822

and

Cory S. Fein (*Pro Hac Vice to be filed*)

E-mail: cory@coryfeinlaw.com

CORY FEIN LAW FIRM

712 Main St., #800

Houston, TX 77002

Telephone: (281) 254-7717

Facsimile: (530) 748-0601

Attorneys for Plaintiff

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
JOHN NORTHRUP, Individually and on behalf
of a Class of Similarly Situated Individuals,
(b) County of Residence of First Listed Plaintiff Hillsborough
(c) Attorneys (Firm Name, Address, and Telephone Number)
FARMER, JAFFE, WEISSING, EDWARDS, FISTOS, LEHRMAN, P.A.,
425 N. Andrews Ave., Suite 2, Fort Lauderdale, FL 33301; Tel:
954-524-2820

DEFENDANTS
RAY SCOTT RISTER; COMPLIANCE EDUCATORS, LLC; and DOT
COMPLIANCE GROUP, LLC,
County of Residence of First Listed Defendant
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.
Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)
1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
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)
Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
1 1 Incorporated or Principal Place of Business In This State
2 2 Incorporated and Principal Place of Business In Another State
3 3 Foreign Nation
4 4
5 5
6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Insurance, Personal Injury, Real Estate, etc.

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
6 Multidistrict Litigation

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
47 U.S.C. § 227
Brief description of cause:
Violation of Telephone Consumer Protection Act

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

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

DATE 03/03/2017 SIGNATURE OF ATTORNEY OF RECORD /s/ Seth M. Lehrman

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

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Compliance Educators, DOT Compliance Group, Owner Hit with TCPA Lawsuit](#)
