

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.

LANE DONOVAN RACETTE, *on behalf of
herself and all others similarly situated,*

Plaintiff,

v.

FIRST FEDERAL CREDIT CONTROL, INC.
an Ohio incorporated company,

Defendant.

CLASS ACTION COMPLAINT AND JURY DEMAND

1. Plaintiff, Lane Donovan Racette, (“Plaintiff”) alleges violations of the *Fair Debt Collection Practices Act*, 15 U.S.C. §1692 *et seq.* (“FDCPA”).

JURISDICTION AND VENUE

2. This Court has jurisdiction under the *Fair Debt Collection Practices Act*, pursuant to 15 U.S.C. §1692k, and 28 U.S.C. § 1331.

3. Venue in this District is proper because Plaintiff resides here, and Defendant conducts business in this District.

PARTIES

4. Plaintiff is a natural person and a resident of the State of Florida residing in Saint Lucie County.

5. Defendant, First Federal Credit Control, Inc., (“Defendant”), is an Ohio company engaged in the business of collecting consumer debts. Defendant operates from offices located at 24799 Chagrin Boulevard, Cleveland, Ohio 44122.

6. Defendant regularly uses the United States Postal Service and telephone in the collection of consumer debts. Defendant is registered in the State of Florida as a consumer collection agency, license number CCA0900183.

7. Defendant regularly collects or attempts to collect consumer debts for other parties. Defendant is a “debt collector” as defined by the *FDCPA*.

8. At all times material to the allegations of this Complaint, Defendant was acting as a debt collector with respect to the collection of Plaintiff’s alleged debt.

FACTUAL ALLEGATIONS

9. Defendant sought to collect a consumer debt from Plaintiff arising from an alleged delinquency on a debt Plaintiff incurred from Ear, Nose and Throat Associates of South Florida. Defendant sought to collect from Plaintiff an alleged debt incurred by Plaintiff for personal, family, or household purposes.

10. On or about December 28, 2017, Defendant mailed or caused to be mailed to Plaintiff a letter seeking payment of the alleged debt. (The “Demand Letter” is attached hereto as “Exhibit 1.”)

11. The Demand Letter stated in part:

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, THIS OFFICE WILL: OBTAIN VERIFICATION OF THE DEBT OR OBTAIN A COPY OF A JUDGEMENT AND MAIL YOU A COPY OF SUCH JUDGEMENT OR VERIFICATION.

12. *15 U.S.C. §1692g(a)* states:

Validation of debts.

(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.

(Emphasis added.) The "Validation Notice."

13. *15 U.S.C. § 1692e(10)* states:

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

XXXX

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.

14. Pursuant to the *FDCPA*, Plaintiff is entitled to be provided accurate information from the Defendant regarding her debt and has a right to be provided the information required by *15 U.S.C. § 1692g(a)*.

15. Defendant's Demand Letter falsely and misleadingly pronounces the verification rights of Plaintiff provided by *15 U.S.C. § 1692g*. Defendant's statement "IF YOU NOTIFY THIS OFFICE IN WRITING WITHIN 30 DAYS FROM RECEIVING THIS NOTICE, THIS OFFICE WILL: OBTAIN VERIFICATION OF THE DEBT OR OBTAIN A COPY OF A JUDGEMENT AND MAIL YOU A COPY OF SUCH JUDGEMENT OR VERIFICATION." omits that the Plaintiff's written notification must dispute the debt or any portion thereof as stated in *15 U.S.C. § 1692g(a)(4)*.

16. Plaintiff has a right to the information prescribed by the Validation Notice and that right was taken from her by Defendant as the Validation Notice incorrectly pronounced the verification rights of *15 U.S.C. § 1692g(a)(4)*.

17. Any potential *bona fide* error defense which relies upon Defendant's mistaken interpretation of the legal duties imposed upon it by the *FDCPA* would fail as a matter of law.

CLASS ACTION ALLEGATIONS

18. This action is brought on behalf of a Class consisting of (i) all natural persons with addresses in the all persons with addresses in the Florida Counties that comprise the geographical boundaries of the United States District Court for the Southern District of Florida, namely Miami-Dade, Monroe, Broward, Palm Beach, Martin, Saint Lucie, Indian River, Okeechobee, and Highlands Counties (ii) to whom initial communication letters that contained the language: "IF YOU NOTIFY THIS OFFICE IN WRITING WITHIN 30 DAYS FROM RECEIVING THIS NOTICE, THIS OFFICE WILL: OBTAIN VERIFICATION OF THE DEBT OR OBTAIN A

COPY OF A JUDGEMENT AND MAIL YOU A COPY OF SUCH JUDGEMENT OR VERIFICATION.” (iii) that were mailed, or caused to be mailed, by the Defendant (iv) and were not returned undeliverable by the U.S. Post Office (v) in an attempt to collect a debt incurred for personal, family, or household purposes (vi) during the one-year period prior to the filing of this Complaint in this action.

19. Plaintiff alleges on information and belief, based upon the Defendant’s use of the phrase: “IF YOU NOTIFY THIS OFFICE IN WRITING WITHIN 30 DAYS FROM RECEIVING THIS NOTICE, THIS OFFICE WILL: OBTAIN VERIFICATION OF THE DEBT OR OBTAIN A COPY OF A JUDGEMENT AND MAIL YOU A COPY OF SUCH JUDGEMENT OR VERIFICATION.” in its initial communication letters served upon the Class, is so numerous that joinder of all members of the Class is impractical.

20. There are questions of law or fact common to the Class, which common issues predominate over any issues involving only individual Class members. The factual issue common to each Class member is that each was mailed, or caused to be mailed, an initial communication letter by Defendant that contained the phrase: “IF YOU NOTIFY THIS OFFICE IN WRITING WITHIN 30 DAYS FROM RECEIVING THIS NOTICE, THIS OFFICE WILL: OBTAIN VERIFICATION OF THE DEBT OR OBTAIN A COPY OF A JUDGEMENT AND MAIL YOU A COPY OF SUCH JUDGEMENT OR VERIFICATION.” The common principal legal issue is whether Defendant failed to provide to each member of the Class the correct validation notice required by *15 U.S.C. §1692g* after an “initial communication” by a debt collector.

21. Plaintiff’s claims are typical of those of the Class members. All are based on the same facts and legal theories.

22. Plaintiff will fairly and adequately protect the interests of the Class. She has retained counsel experienced in handling actions involving unlawful practices under the *FDCPA* and Class actions. Neither Plaintiff nor her counsel have any interests which might cause them not to vigorously pursue this action.

23. Certification of the Class under *Rule 23(b)(3)* of the *Federal Rules of Civil Procedure* is also appropriate in that:

(1) The questions of law or fact common to the members of the class predominate over any questions affecting an individual member.

(2) A class action is superior to other available methods for the fair and efficient adjudication of the controversy.

24. Plaintiff requests certification of a Class under *Rule 23(b)(3)*, of the *Federal Rules of Civil Procedure*, for monetary damages; her appointment as Class Representative; and that her attorney Leo W. Desmond be appointed Class Counsel.

COUNT I
VIOLATION OF 15 U.S.C. §1692g(a)(4)
CLASS CLAIM AGAINST DEFENDANT

25. Plaintiff incorporates Paragraphs 1 through 17.

26. *15 U.S.C. §1692g(a)(4)* states after an initial communication the Defendant must provide Plaintiff with:

(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

27. Defendant mailed or caused to be mailed the Demand Letter to Plaintiff on behalf of Plaintiff's creditor in an attempt to collect a consumer debt.

28. Defendant's Demand Letter omits that the consumer, in order to receive the benefits provided by *15 U.S.C. §1692g(a)(4)*, must dispute the debt or any portion of the debt.

29. Defendant's statement "IF YOU NOTIFY THIS OFFICE IN WRITING WITHIN 30 DAYS FROM RECEIVING THIS NOTICE, THIS OFFICE WILL: OBTAIN VERIFICATION OF THE DEBT OR OBTAIN A COPY OF A JUDGEMENT AND MAIL YOU A COPY OF SUCH JUDGEMENT OR VERIFICATION." does not inform the least sophisticated consumer of what they need to notify the Defendant of, i.e. that they dispute the debt or any portion thereof.

30. Plaintiff is entitled to be given notice of her right to dispute the debt or a portion of her alleged debt pursuant to *15 U.S.C. §1692g(a)(4)*. Defendant has taken away such right by not correctly stating the statute in its Validation Notice to Plaintiff.

31. Defendant failed to inform Plaintiff and the Class of their right pursuant to *15 U.S.C. §1692g(a)(4)* to give a written dispute of the debt or a portion of the debt which would not only involve the protections provided to Plaintiff and the Class pursuant to *§1692g(a)(4)* but also pursuant to *§1692g(b)*.

32. By not providing to the Plaintiff and the Class the proper notice pursuant to *15 U.S.C. §1692g(a)(4)*, Defendant has caused damage to the Plaintiff and the Class by taking away their statutory right to receive the correct validation notice.

33. As a result of Defendant's conduct, Plaintiff and the Class are entitled to an award of statutory damages pursuant to *15 U.S.C. §1692k*.

34. As a result of Defendant's conduct, Plaintiff and the Class are entitled to an award of costs and attorney fees pursuant to *15 U.S.C. §1692k*.

COUNT II
VIOLATION OF 15 U.S.C. §1692e
CLASS CLAIM AGAINST DEFENDANT

35. Plaintiff re-alleges Paragraphs 1 through 17 and 26 through 32.

36. *15 U.S.C. §1692e* states:

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section:

XXXX

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.

37. Defendant sent the Demand Letter to Plaintiff in connection with the collection of a consumer debt.

38. Defendant's Demand Letter omits that the consumer must despite the debt or dispute any portion of the debt, in writing despite the clear wording of *15 U.S.C. §1692g(a)(4)*.

39. Defendant's Demand Letter is a misstatement of *15 U.S.C. §1692g(a)(4)* that would be confusing and misleading to the least sophisticated consumer with regard to his/her legal rights as it omits to inform the Plaintiff (and the Class) that she (they) must dispute the debt, or any portion thereof, in writing in order to receive verification of the debt as well as the protections available pursuant to *15 U.S.C. §1692g(b)*. The Demand Letter could mislead the least sophisticated to believe that he/she could notify the Defendant of their inability to pay the debt and they would be afforded the protections of *15 U.S.C. § 1692g(a)(4)*.

40. Defendant's statement "IF YOU NOTIFY THIS OFFICE IN WRITING WITHIN 30 DAYS FROM RECEIVING THIS NOTICE, THIS OFFICE WILL: OBTAIN VERIFICATION OF THE DEBT OR OBTAIN A COPY OF A JUDGEMENT AND MAIL

YOU A COPY OF SUCH JUDGEMENT OR VERIFICATION.” does not inform Plaintiff (or the Class) of what she (they) must notify Defendant of, i.e. that they must dispute the debt.

41. As a result of Defendant’s conduct, Plaintiff and the Class are entitled to an award of statutory damages pursuant to *15 U.S.C. §1692k*.

42. As a result of Defendant’s conduct, Plaintiff and the Class are entitled to an award of costs and attorney’s fees pursuant to *15 U.S.C. §1692k*.

JURY DEMAND

Plaintiff demands a trial by jury.

RELIEF REQUESTED

WHEREFORE, Plaintiff prays for the following relief:

- a. An Order certifying this matter as a Class action and appointment of Plaintiff as Class Representative as to all claims against Defendant;
- b. An Order appointing Leo W. Desmond as Class Counsel;
- c. An award of statutory damages for Plaintiff and the Class pursuant to *15 U.S.C. §1692k*;
- d. An award of attorney’s fees, litigation expenses and costs of the instant suit; and
- e. Such other and further relief as the Court deems proper.

Dated: October 1, 2018

Respectfully submitted,

By: /s/ Leo Desmond
Leo W. Desmond, Esq.
Florida Bar No. 0041920

By: /s/ Sovathary Jacobson
Sovathary K. Jacobson, Esq.
Florida Bar No. 0102200

DESMOND LAW FIRM, P.C.

5070 Highway A1A, Suite D
Vero Beach, Florida 32963
Telephone: 772.231.9600
Facsimile: 772.231.0300
lwd@desmondlawfirm.com
jacobson@desmondlawfirm.com
Attorneys for Plaintiff

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.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS LANE DONOVAN RACETTE, on behalf of herself and all others similarly situated, DEFENDANTS FIRST FEDERAL CREDIT CONTROL, INC. an Ohio incorporated company,

(b) County of Residence of First Listed Plaintiff Saint Lucie (EXCEPT IN U.S. PLAINTIFF CASES) County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address, and Telephone Number) Desmond Law Firm, P.C. 5070 A1A, D, Vero Beach, FL 32963 (772)231.9600 Attorneys (If Known)

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only) III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Form with checkboxes for Basis of Jurisdiction (U.S. Government Plaintiff/Defendant, Federal Question, Diversity) and Citizenship of Principal Parties (Citizen of This State, Another State, Foreign Country).

IV. NATURE OF SUIT (Place an "X" in One Box Only) Click here for: Nature of Suit Code Descriptions

Large grid of checkboxes for Nature of Suit categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, PERSONAL INJURY, TORTS, PRISONER PETITIONS, LABOR, IMMIGRATION, FORFEITURE/PENALTY, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only) 1 Original Proceeding 2 Removed from State Court 3 Re-filed (See VI below) 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation Transfer 7 Appeal to District Judge from Magistrate Judgment 8 Multidistrict Litigation - Direct File 9 Remanded from Appellate Court

VI. RELATED/ RE-FILED CASE(S) (See instructions): a) Re-filed Case YES NO b) Related Cases YES NO JUDGE: DOCKET NUMBER:

VII. CAUSE OF ACTION Fair Debt Collection Practices Act 15 U.S.C. § 1692 et seq LENGTH OF TRIAL via 2-3 days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$500,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE DATE October 1, 2018 SIGNATURE OF ATTORNEY OF RECORD /s/ Leo W. Desmond FL Bar 0041920

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. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).

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.

Refiled (3) Attach copy of Order for Dismissal of Previous case. Also complete VI.

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.

Remanded from Appellate Court. (8) Check this box if remanded from Appellate Court.

VI. Related/Refiled Cases. This section of the JS 44 is used to reference related pending cases or re-filed cases. Insert the docket numbers and the corresponding judges name for such cases.

VII. 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

VIII. 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.

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

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

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

LANE DONOVAN RACETTE, on behalf of herself and all others similarly situated,

Plaintiff(s)

v.

FIRST FEDERAL CREDIT CONTROL, INC. an Ohio incorporated company,

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) FIRST FEDERAL CREDIT CONTROL, INC. c/o CORPORATE CREATIONS NETWORK INC.(REGISTERED AGENT) 11380 PROSPERITY FARMS ROAD #221E PALM BEACH GARDENS, FL 33410

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: LEO W. DESMOND, ESQ. DESMOND LAW FIRM, P.C. 5070 A1A, SUITE D VERO BEACH, FL 32963

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 Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons 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 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:

PERSONAL & CONFIDENTIAL

24700 CHAGRIN BLVD STE 205
CLEVELAND, OH 44122-5662



FIRST FEDERAL CREDIT CONTROL, INC.

Address Service Requested

www.ffcc.com

FF00A

A DEBT COLLECTION COMPANY - NOT A CREDIT BUREAU

NOT AFFILIATED WITH THE U.S. GOVERNMENT

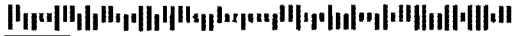
Monday-Friday from 8:00am - 5:00pm

Los representantes de habla hispana estan disponibles de lunes a viernes 8:00am - 5:00pm.

Cleveland
Toll Free

866-446-4076

Dec 28, 2017



BVCL 001047
75/5#



LANE DONOVANRACETTE
1502 SW CALMAR AVE
PORT SAINT LUCIE FL 34953-6514

CREDITOR: EAR,NOSE,A THROAT ASSOCIATES OF S.FLA

ACCOUNT NO.: [REDACTED] 775

PAY THIS AMOUNT → \$ 80.15

YOUR ACCOUNT HAS BEEN REFERRED TO THIS COLLECTION AGENCY FOR COLLECTION. ALL UNPAID ACCOUNTS COULD BE REPORTED TO A NATIONAL CREDIT BUREAU. RETURN THE BOTTOM OF THIS FORM WITH PAYMENT IN FULL.

PLEASE CONTACT LISA CLARK - EXT - 324

Creditor	Amt Owed
THROAT ASSOCIATES OF S.FL	80.15

THIS IS A COMMUNICATION FROM A DEBT COLLECTOR.

IMPORTANT NOTICE

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, THIS OFFICE WILL: OBTAIN VERIFICATION OF THE DEBT OR OBTAIN A COPY OF A JUDGEMENT AND MAIL YOU A COPY OF SUCH JUDGEMENT OR VERIFICATION. IF YOU REQUEST 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. THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

RETAIN THE UPPER PORTION FOR YOUR RECORDS. DETACH AND RETURN THIS FORM WITH PAYMENT.

TO AVOID ERRORS, PLEASE MAKE ALL PAYMENTS PAYABLE TO FFCC OR TO THE CREDITOR LISTED ABOVE AND MAIL TO THIS OFFICE. INCLUDE YOUR ACCOUNT NUMBER LISTED ABOVE ON YOUR CHECK OR MONEY ORDER.

NAME: LANE DONOVANRACETTE

Dec 28, 2017 LC

CREDITOR: EAR,NOSE,A THROAT ASSOCIATES OF S.FLA

ACCOUNT NO.: [REDACTED] 775

PAY THIS AMOUNT → \$ 80.15

Please indicate which credit card to use for payment and complete the information below.
For all credit card payments, please verify your CID number, which is located on the back of your card. The CID number is the last 3 or 4 digits after your credit card number.

MAKE SURE OUR ADDRESS SHOWS IN WINDOW

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
CARD NUMBER		CID	
SIGNATURE		EXP. DATE	

FIRST FEDERAL CREDIT CONTROL
24700 CHAGRIN BLVD STE 205
CLEVELAND, OH 44122-5662

FF00A



ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [First Federal Credit Control Misstated Consumer's Rights, Lawsuit Alleges](#)
