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JONATHAN A. STIEGLITZ, ESQ.
(SBN 278028)
jonathan.a.stieglitz@gmail.com
THE LAW OFFICES OF
JONATHAN A. STIEGLITZ
11845 W. Olympic Blvd., Suite 800
Los Angeles, California 90064
Telephone: (323) 979-2063
Facsimile: (323) 488-6748

Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

Case No.: '18CV1275 BEN BLM

SHALEESE SMITH individually
and on behalf of all others similarly
situated;

COMPLAINT for violations of the Fair
Debt Collection Practices Act, 15 U.S.C.
§ 1692 *et seq.*

Plaintiff,

CLASS ACTION COMPLAINT

-against-

DEMAND FOR JURY TRIAL

THE LAW OFFICES OF ROBERT
J. COLCLOUGH, III,

ALLIED COLLECTION
SERVICES OF CALIFORNIA,
LLC,

AND John Does 1-25.

Defendant(s).

Plaintiff Shaleese Smith (hereinafter, "Plaintiff" or "Smith"), a California resident, brings this Class Action Complaint by and through her attorneys, against Defendant The Law Offices of Robert J. Colclough, III (hereinafter "Defendant Colclough") and Defendant Allied Collection Services of California, LLC (hereinafter "Defendant Allied") individually and on behalf of a class of all others

1 similarly situated, pursuant to Rule 23 of the Federal Rules of Civil Procedure,
2 based upon information and belief of Plaintiff’s counsel, except for allegations
3 specifically pertaining to Plaintiff, which are based upon Plaintiff’s personal
4 knowledge.
5

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7
8 **JURISDICTION AND VENUE**

9 1. The Court has jurisdiction over this matter pursuant to 28 U.S.C.
10 § 1331, as well as 15 U.S.C. § 1692 *et seq.* and 28 U.S.C. § 2201. The Court
11 also has pendant jurisdiction over the State law claims in this action pursuant
12 to 28 U.S.C. § 1367(a).
13

14 2. Venue is proper in this judicial district pursuant to 28 U.S.C.
15 § 1391(b)(2).
16

17 3. Plaintiff brings this action for damages and declaratory and injunctive
18 relief arising from the Defendant’s violations of 15 U.S.C. § 1692 *et seq.*,
19 commonly known as the Fair Debt Collections Practices Act (“FDCPA”).
20
21

22 **PARTIES**

23
24 4. Plaintiff is a resident of the State of California, residing in the County
25 of San Diego, at 1890 Washington Street, Lemon Grove, CA, 91945.
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5. Defendant Colclough is "debt collector" as the phrase is defined in 15 U.S.C. § 1692(a)(6) and used in the FDCPA, with an address at 9301 Oakdale Avenue, Suite 205, Chatsworth, California, 91311.

6. Defendant Allied is a "debt collector" as the phrase is defined in 15 U.S.C. § 1692(a)(6) and used in the FDCPA with an address at 9301 Oakdale Avenue, Suite 205, Chatsworth, California, 91311.

7. Upon information and belief, Defendant Colclough is a company that uses the mail, telephone, and facsimile and regularly engages in business the principal purpose of which is to attempt to collect debts alleged to be due another.

8. Upon information and belief, Defendant Allied is a company that uses the mail, telephone, and facsimile and regularly engages in business the principal purpose of which is to attempt to collect debts alleged to be due another.

9. John Does 1-25, are fictitious names of individuals and businesses alleged for the purpose of substituting names of Defendants whose identities will be disclosed in discovery and should be made parties to this action.

CLASS ALLEGATIONS

1
2 10.Plaintiff brings this claim on behalf of the following case, pursuant to Fed. R.
3 Civ. P. 23(a) and 23(b)(3).

4
5 11.The Class consists of:

- 6 a. all individuals with addresses in the State of California;
- 7 b. to whom Defendant Colclough sent an initial collection letter
- 8 attempting to collect a consumer debt;
- 9 c. that failed to include the proper disclosures required by §1692g;
- 10 d. specifically identifying the current creditor;
- 11 e. as well as making threats that overshadow the Consumer’s rights;
- 12 f. which letter was sent on or after a date one (1) year prior to the
- 13
- 14 filing of this action and on or before a date twenty-one (21) days
- 15
- 16 after the filing of this action.
- 17

18 12.The identities of all class members are readily ascertainable from the records
19 of Defendants and those companies and entities on whose behalf they attempt
20 to collect and/or have purchased debts.

21
22 13.Excluded from the Plaintiff Class are the Defendants and all officer,
23 members, partners, managers, directors and employees of the Defendants and
24 their respective immediate families, and legal counsel for all parties to this
25 action, and all members of their immediate families.
26
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1 14. There are questions of law and fact common to the Plaintiff Class, which
2 common issues predominate over any issues involving only individual class
3 members. The principal issue is whether the Defendants' written
4 communications to consumers, in the forms attached as Exhibit A, violate 15
5 U.S.C. §§ 1692e and 1692g.
6

7
8 15. The Plaintiff's claims are typical of the class members, as all are based upon
9 the same facts and legal theories. The Plaintiff will fairly and adequately
10 protect the interests of the Plaintiff Class defined in this complaint. The
11 Plaintiff has retained counsel with experience in handling consumer lawsuits,
12 complex legal issues, and class actions, and neither the Plaintiff nor her
13 attorneys have any interests, which might cause them not to vigorously
14 pursue this action.
15

16
17 16. This action has been brought, and may properly be maintained, as a class
18 action pursuant to the provisions of Rule 23 of the Federal Rules of Civil
19 Procedure because there is a well-defined community interest in the
20 litigation:
21

22 g. **Numerosity:** The Plaintiff is informed and believes, and on that
23 basis alleges, that the Plaintiff Class defined above is so numerous
24 that joinder of all members would be impractical.
25

26 h. **Common Questions Predominate:** Common questions of law and
27 fact exist as to all members of the Plaintiff Class and those
28

1 questions predominate over any questions or issues involving only
2 individual class members. The principal issue is whether the
3 Defendants' written communications to consumers, in the forms
4 attached as Exhibit A violate 15 U.S.C. § 1692e and §1692g.
5

6 i. **Typicality:** The Plaintiff's claims are typical of the claims of the
7 class members. The Plaintiff and all members of the Plaintiff Class
8 have claims arising out of the Defendants' common uniform course
9 of conduct complained of herein.
10

11 j. **Adequacy:** The Plaintiff will fairly and adequately protect the
12 interests of the class members insofar as Plaintiff has no interests
13 that are adverse to the absent class members. The Plaintiff is
14 committed to vigorously litigating this matter. Plaintiff has also
15 retained counsel experienced in handling consumer lawsuits,
16 complex legal issues, and class actions. Neither the Plaintiff nor her
17 counsel has any interests which might cause them not to vigorously
18 pursue the instant class action lawsuit.
19

20 k. **Superiority:** A class action is superior to the other available means
21 for the fair and efficient adjudication of this controversy because
22 individual joinder of all members would be impracticable. Class
23 action treatment will permit a large number of similarly situated
24 persons to prosecute their common claims in a single forum
25
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1 23.Premier is a "creditor" as defined by 15 U.S.C.§ 1692a(4).

2 24.Defendant Allied, a debt collector and/or the subsequent owner of the
3 Premier debt, contracted with the Defendant Colclough to collect the alleged
4 debt.
5

6 25.Defendants collect and attempt to collect debts incurred or alleged to have
7 been incurred for personal, family or household purposes on behalf of
8 creditors using the United States Postal Services, telephone and internet.
9

10
11
12 Violation – June 15, 2017 Collection Letter

13 26.On or about June 15, 2017, Defendant Colclough sent Plaintiff an initial
14 contact notice (the “Letter”) regarding the alleged debt owed. See Letter at
15 Exhibit A.
16

17 27.When a debt collector solicits payment from a consumer, it must, within five
18 days of an initial communication

19
20 (1) the amount of the debt;

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

22 (3) a statement that unless the consumer, within thirty days after receipt of
23 the notice, disputes the validity of the debt, or any portion thereof, the debt
24 will be assumed to be valid by the debt collector;
25

26 (4) a statement that if the consumer notifies the debt collector in writing
27 within the thirty-day period that the debt, or any portion thereof, is disputed,
28

1 the debt collector will obtain verification of the debt or a copy of the
2 judgment against the consumer and a copy of such verification or judgment
3 will be mailed to the consumer by the debt collector; and
4
5 (5) a statement that, upon the consumer's written request within the thirty-day
6 period, the debt collector will provide the consumer with the name and
7 address of the original creditor, if different from the current creditor. 15
8 U.S.C. § 1692g(a).

9 These disclosures are more commonly known as the “G-Notice”.

10 28. The FDCPA further provides that "if the consumer notifies the debt collector
11 in writing within the thirty day period . . . that the debt, or any portion
12 thereof, is disputed . . . the debt collector shall cease collection . . . until the
13 debt collector obtains verification of the debt . . . and a copy of such
14 verification is mailed to the consumer by the debt collector." 15 U.S.C.
15 § 1692g(b).

16 29. The “G-Notice” in the Letter does not meet the required guidelines of the
17 FDCPA as it fails to clearly state the Current Creditor, or define the roles of
18 the multiple parties collecting this debt.

19 30. Specifically, the letter states: RE: Case NO. 991271-1 Premier Auto Credit.

20 31. The letter does explicitly state the original creditor or current creditor.
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1 32. In further confusion the letter directs online payments to be made at Allied
2 Collection Services of California website, without any explanation as to
3 Defendant Allied's role in the collection of this matter.
4

5 33. The obligation is not only to have the name of the creditor on the letter, but
6 to convey the name of the creditor clearly and explicitly.
7

8 34. Additionally the letter contains credit reporting and legal threats that act to
9 overshadow the "g-notice" language as it threatens the consumer in an
10 attempt to make them pay and not dispute the debt.
11

12 35. Plaintiff incurred an informational injury as Defendants omitted required
13 information of the "G-Notice" by failing to provide the name of the current
14 creditor in a clear manner.
15

16 36. Additionally Plaintiff was harmed by Defendants threats of credit reporting
17 and legal action.
18

19 37. As a result of Defendants' deceptive, misleading and unfair debt collection
20 practices, Plaintiff has been damaged.
21

22 **COUNT I**
23 **VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT 15**
24 **U.S.C. §1692e et seq.**

25 38. Plaintiff repeats, reiterates and incorporates the allegations contained in
26 paragraphs above herein with the same force and effect as if the same were
27 set forth at length herein.
28

1 39. Defendants' debt collection efforts attempted and/or directed towards the
2 Plaintiff violated various provisions of the FDCPA, including but not limited
3 to 15 U.S.C. § 1692e.
4

5 40. Pursuant to 15 U.S.C. § 1692e, a debt collector may not use any false,
6 deceptive, or misleading representation or means in connection with the
7 collection of any debt.
8

9 41. Defendants violated § 1692e :

10
11 1. By making a false and misleading representation in violation of
12 § 1692e(10).
13

14 42. By reason thereof, Defendants are liable to Plaintiff for judgment that
15 Defendants' conduct violated Section 1692e et seq. of the FDCPA, actual
16 damages, statutory damages, costs and attorneys' fees.
17
18
19
20

21 **COUNT II**
22 **VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES**
23 **ACT 15 U.S.C. § 1692g et seq.**

24 43. Plaintiff repeats, reiterates and incorporates the allegations contained in
25 paragraphs above herein with the same force and effect as if the same were
26 set forth at length herein.
27
28

1 44. Defendants' debt collection efforts attempted and/or directed towards the
2 Plaintiff violated various provisions of the FDCPA, including but not limited
3 to 15 U.S.C. § 1692g.
4

5 45. Pursuant to 15 USC §1692g, a debt collector:

6
7 Within five days after the initial communication with a consumer in
8 connection with the collection of any debt, a debt collector shall, unless the
9 following information is contained in the initial communication or the
10 consumer has paid the debt, send the consumer a written notice containing –
11

- 12
13 i. The amount of the debt;
- 14
15 ii. The name of the creditor to whom the debt is owed;
- 16
17 iii. A statement that unless the consumer, within thirty days after
18 receipt of the notice, disputes the validity of the debt, or any
19 portion thereof, the debt will be assumed to be valid by the
20 debt-collector;
- 21
22 iv. A statement that the consumer notifies the debt collector in
23 writing within thirty-day period that the debt, or any portion
24 thereof, is disputed, the debt collector will obtain verification
25 of the debt or a copy of a judgment against the consumer and
26 a copy of such verification or judgment will be mailed to the
27 consumer by the debt collector; and
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v. 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.

46.The Defendants violated 15 U.S.C. §1692g, by failing to clearly and concisely identify the current creditor.

47.Additionally the Defendants violated 15 U.S.C. §1692g as the threats in the letter overshadowed the Plaintiff right to dispute.

48. By reason thereof, Defendants are liable to Plaintiff for judgment that Defendants’ conduct violated Section 1692g et seq. of the FDCPA, actual damages, statutory damages, costs and attorneys’ fees.

DEMAND FOR TRIAL BY JURY

49.Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff hereby requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Shaleese Smith, individually and on behalf of all others similarly situated, demands judgment from Defendant The Law Offices of Robert J Colclough and Defendant Allied Collection Services of California, as follows:

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1. Declaring that this action is properly maintainable as a Class Action and certifying Plaintiff as Class representative, and Jonathan Stieglitz, Esq. as Class Counsel;
2. Awarding Plaintiff and the Class statutory damages;
3. Awarding Plaintiff and the Class actual damages;
4. Awarding Plaintiff costs of this Action, including reasonable attorneys' fees and expenses;
5. Awarding pre-judgment interest and post-judgment interest; and
6. Awarding Plaintiff and the Class such other and further relief as this Court may deem just and proper.

Dated: June 13, 2018

THE LAW OFFICES OF
JONATHAN A. STIEGLITZ

By: /s/ Jonathan A Stieglitz
Jonathan A Stieglitz

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

SHALEESE SMITH individually and on behalf of all others similarly situated;

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

(c) Attorneys (Firm Name, Address, and Telephone Number) THE LAW OFFICES OF JONATHAN A. STIEGLITZ 11845 W. Olympic Blvd., Suite 800, Los Angeles, California 90064 (323) 979-2063 jonathan.a.stieglitz@gmail.com

DEFENDANTS

THE LAW OFFICES OF ROBERT J. COLCLOUGH, III, ALLIED COLLECTION SERVICES OF CALIFORNIA, LLC, and John Does 1-25.

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

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

'18CV1275 BEN BLM

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)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

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

Large table with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, PRISONER PETITIONS, TORTS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, 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 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District (specify), 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): Fair Debt Collection Practices Act 15 USC Sect. 1692 et seq. Brief description of cause: Improper Collection Letter

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 06/13/2018 SIGNATURE OF ATTORNEY OF RECORD /s/ Jonathan A Stieglitz

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

Print

Save As...

Reset

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.Cv.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; **NOTE: 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 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.
 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 – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- 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 actual dollar amount 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.

EXHIBIT A

THE LAW OFFICES OF ROBERT J. COLCLOUGH, III

9301 OAKDALE AVE, SUITE 205

Chatsworth, California 91311

Telephone : (818) 906-0120

Facsimile : (818) 933-3383

June 15, 2017

RE : ██████████ Premier Auto Credit
AMOUNT : \$ 5061.35
INTEREST : \$ 27.73
TOTAL : \$ 5089.08



Dear Shaleese Smith,

This notice will serve to inform you that this office has received your delinquent account for collections. This account has not yet been reviewed by an attorney. If this matter is not resolved in a timely manner we may take legal action or forward this account to associated counsel in your area who may take legal action that could result in a judgment against you. That judgment could include the actual cost of the filing fee, the actual cost of the service of process and reasonable attorneys fees.

MAKE A SECURE PAYMENT ONLINE AT WWW.ACSCA.COM

You may remit payment by money order or check to the address listed below, or for your convenience, you can also pay by credit card, western union, or personal check over the telephone. Mail your payment to the following address:

THE LAW OFFICES OF ROBERT J. COLCLOUGH, III
9301 OAKDALE AVE, SUITE 205
CHATSWORTH CA 91311

Should you wish to cease all further collection procedures, credit bureau reporting and **avoid possible legal action**, mail in the balance due, or contact me immediately to discuss arrangements for payment or a possible settlement for this account.

We are a professional collection law firm attempting to collect a debt. We are entitled to use, and we intend to use all approved means at our command to collect debts that have been referred to us. Any information we obtain will be used as a basis to enforce collection of the debt. This debt will be assumed valid by the debt collector unless the consumer, within 30 days after receipt of this notice, disputes the validity of the debt or any portion thereof. If the consumer notifies the debt collector in writing within the 30 days that the debt, or any portion thereof, is disputed, the debt collector will obtain verification of the debt, and the collector will mail a copy of such verification to the consumer. Upon the consumer's written request within 30 days, the debt collector will provide the consumer with the name and address of the original creditor, if different from the current creditor.

Sincerely,

Mr. House

Mr. House
(818) 906-0120

PLEASE SEE REVERSE SIDE FOR IMPORTANT INFORMATION

✕ Detach Bottom Portion And Return With Payment ✕

9301 OAKDALE AVE
SUITE 205
CHATSWORTH CA 91311
ADDRESS SERVICE REQUESTED

June 15, 2017

Case No.
██████████

Total :
\$ 5089.08

Please see back for credit card payment information

██
S-CTACSR30 L-003A-991271-1
P72B5W00903292 -519882628 104348

SHALEESE SMITH

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THE LAW OFFICES OF
ROBERT J. COLCLOUGH, III
9301 OAKDALE AVE, SUITE 205
CHATSWORTH CA 91311

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: [Allied Collection Services, CA Law Firm Named in Woman's FDCPA Lawsuit](#)
