

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

JACQUELINE A. VANDEHEY, individually
and on behalf of all others similarly situated,

Plaintiff,

vs.

Case No.: 1:18-cv-01086

SEQUIUM ASSET SOLUTIONS, LLC, a
Georgia Limited Liability Company, and JOHN
DOES,

Defendants.

**CLASS ACTION COMPLAINT FOR VIOLATIONS OF THE FAIR DEBT
COLLECTION PRACTICES ACT AND DEMAND FOR JURY TRIAL**

Plaintiff, JACQUELINE A. VANDEHEY, individually and on behalf of all others similarly situated, brings this action against Defendants, SEQUIUM ASSET SOLUTIONS, LLC (“SEQUIUM”) and JOHN DOES. In support of her Complaint, Plaintiff says:

I. PRELIMINARY STATEMENT

1. Plaintiff, individually and on behalf of all others similarly situated, brings this action for Defendants’ illegal practices which include using false, deceptive, and misleading practices in connection with its attempts to collect alleged consumer debts from Plaintiff and other similarly situated Wisconsin consumers.

2. Plaintiff alleges Defendants’ collection practices violate the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692, *et seq.* Such collection practices include, *inter alia*, sending consumers written communications in an attempt to collect debts which fail to identify the creditor to whom the debt is owed.

3. The FDCPA regulates the behavior of “debt collectors” (including collection agencies, collection attorneys, debt buyers) when attempting to collect a consumer debt.

Congress found “abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many debt collectors” which “contribute to a number of personal bankruptcies, marital instability, loss of jobs, and invasions of individual privacy.” 15 U.S.C. § 1692(a). The FDCPA was expressly adopted “to eliminate abusive debt collection practices by debt collectors, to ensure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged, and to promote uniform State action to protect consumers against debt collection abuses.” 15 U.S.C. § 1692(e).

4. A single violation is sufficient to establish liability. *Nielsen v. Dickerson*, 307 F.3d 623, 640 (7th Cir. 2002).

5. Although the FDCPA is not a strict-liability statute, “most infractions result in liability” without proof of *scienter* unless the specific infractions includes an element of intent or purpose or the debt collector can affirmatively prove a *bona fide* error under 15 U.S.C. § 1692k(c). *Oliva v. Blatt, Hasenmiller, Leibsker & Moore LLC*, 864 F.3d 492, 502 (7th Cir. 2017), *cert. denied*, 138 S. Ct. 1283 (2018).

6. Whether a debt collector’s conduct violates the FDCPA should be judged from the standpoint of the “unsophisticated debtor.” *Gammon v. GC Servs. Ltd. P’ship*, 27 F.3d 1254, 1257 (7th Cir. 1994). “The unsophisticated consumer is uninformed, naive, and trusting, but possesses rudimentary knowledge about the financial world, is wise enough to read collection notices with added care, possesses reasonable intelligence, and is capable of making basic logical deductions and inferences.” *Williams v. OSI Educ. Servs., Inc.*, 505 F.3d 675, 678 (7th Cir. 2007) (internal editing notations and quotation marks omitted).

7. To prohibit deceptive practices, the FDCPA, at 15 U.S.C. § 1692e, outlaws a debt collector’s use of a false, deceptive, and misleading representation or means when collecting debts and includes a non-exclusive list of specific conduct which constitutes *per se* violations of

§ 1692e.

8. Similar to § 1692e, 15 U.S.C. § 1692f, bars a debt collector from using any unfair or unconscionable means when collecting or attempting to collect a debt and includes a non-exclusive list of specific conduct which constitutes *per se* violations of § 1692f.

9. At 15 U.S.C. § 1692g(a), the FDCPA requires disclosure of certain information either in a debt collector's initial communication or within five days after the initial communication. At 15 U.S.C. § 1692g(b), the FDCPA restrains a debt collector from conduct and communications which would overshadow or be inconsistent with certain rights disclosed pursuant to § 1692g(a).

10. A debt collector who fails to comply with any provision of the FDCPA with respect to any person is liable to that person for actual damages (if any), statutory damages, costs, and reasonable counsel fees. 15 U.S.C. § 1692k(a). A plaintiff's award of statutory damages is limited to \$1,000 and a class's award is limited to the lesser of \$500,000 or 1% of the debt collector's net worth. *Id.* The award to the class is to be made "without regard to a minimum individual recovery." *Id.*

11. Plaintiff, individually and on behalf of all others similarly situated, seeks damages, attorney fees, costs, and all other relief, equitable or legal in nature, as deemed appropriate by this Court, pursuant to the FDCPA.

II. PARTIES

12. Plaintiff is a natural person.

13. At all times relevant to this lawsuit, Plaintiff is a citizen of, and resides in, Kaukauna, Outagamie County, Wisconsin.

14. On information and belief, SEQUIUM is a for-profit Limited Liability Company existing pursuant to the laws of the State of Georgia.

15. SEQUIUM maintains its principal business address at 1130 Northchase Parkway, Suite 150, Marietta, Georgia 30067.

16. Defendants, JOHN DOES, are sued under fictitious names as their true names and capacities are yet unknown to Plaintiff. Plaintiff will amend this complaint by inserting the true names and capacities of these Defendants once they are ascertained.

III. JURISDICTION AND VENUE

17. Jurisdiction of this Court arises under 28 U.S.C. §§ 1331 and 1337.

18. Venue is appropriate in this federal district pursuant to 28 U.S.C. §1391(b) because a substantial part of the events giving rise to Plaintiff's claims occurred within this federal judicial district, and because SEQUIUM is subject to personal jurisdiction in the State of Wisconsin at the time this action is commenced.

IV. FACTS CONCERNING DEFENDANT

19. SEQUIUM regularly collects, and attempts to collect, defaulted debts incurred, or alleged to have been incurred, for personal, family, or household purposes on behalf of creditors using the U.S. Mail, telephone, and Internet.

20. Plaintiff is informed and believes, and on that basis alleges, JOHN DOES, are natural persons and/or business entities all of whom reside or are located within the United States who personally created, instituted and, with knowledge that such practices were contrary to law, acted consistent with and oversaw the violative policies and procedures used by the employees of SEQUIUM that are the subject of this Complaint. JOHN DOES personally control the illegal acts, policies, and practices utilized by SEQUIUM and, thus, are personally liable for all the wrongdoing alleged in this Complaint.

V. FACTS CONCERNING PLAINTIFF

21. Defendants mailed Plaintiff a letter (“Letter”) dated August 4, 2017.
22. A true copy of the Letter is attached as *Exhibit A* except that Plaintiff’s counsel has partially redacted the Letter as required by Fed. R. Civ. P. 5.2.
23. The Letter describes an alleged financial credit card obligation arising out of one or more transactions the subject(s) of which were primarily for personal, family, and household purposes (“Debt”).
24. The Debt was assigned to SEQUIUM by an unknown creditor for the purpose of attempting collection after the financial obligation was in default.
25. SEQUIUM mailed the Letter in an attempt to collect the Debt.
26. The Debt was in default at the time SEQUIUM mailed Plaintiff the Letter.
27. *Exhibit A* is the initial written communication SEQUIUM sent Plaintiff to collect the Debt.
28. The Letter references an account, but does not identify the creditor of the Debt.
29. “BLAZE CREDIT CARD” is a financial product.
30. “BLAZE CREDIT CARD” it is not the name of the creditor.
31. The Letter states Plaintiff may “Pay Client Directly,” but no “client” is identified on the Letter.
32. The Letter also states Plaintiff may “contact the creditor directly” but no “creditor” is identified on the Letter.
33. The Letter also states Plaintiff may “Pay from an old statement” but due to the addition of interest and late fees on a credit card debt, the amount of the debt on any “old statement” could be significantly different from the amount sought in the Letter.

34. The unsophisticated consumer, being advised to “pay from an old statement,” would be confused as to the correct account balance and actual amount owed.

35. The Letter refers the unsophisticated consumer to “an old statement” without explaining that the balance of the Debt had been accelerated.

36. The unsophisticated consumer, upon being directed to “an old statement,” would have no idea how much was actually due as of the date the Letter was mailed.

37. Referring an unsophisticated consumer to “an old statement” is misleading and confusing to the as to the amount due, even assuming the unsophisticated consumer actually finds and refers to the final statement she received.

38. Additionally, the statement that the consumer may “pay from an old statement” is even more confusing in light of the statutory validation notice, which states that the consumer has the right to request the name and address of the original creditor.

39. The unsophisticated consumer, having been told to “pay from an old statement,” would be confused as to whether she can request the name and address of the original creditor.

40. Normally, the confusion may be cured by the statement that the debt collector will only provide this information if the name and address of the original credit is “different from the current creditor.” 15 U.S.C. § 1692g(a)(5).

41. However, the Letter deviates from the statutory language. *Compare* 15 U.S.C. § 1692g(a)(5) (requiring “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) with *Exhibit A* (“this office will provide you with the name and address of the original creditor, if different *for* the current creditor.”).

42. The unsophisticated consumer, having been informed that she may request the name and address of the original creditor, if different for the current creditor, would be confused as to whether she may actually pay from an old statement or if the current creditor is not the original creditor.

43. The unsophisticated consumer knows that debts are freely assignable and that defaulted consumer debts are bought and sold to assignees who also act as third-party debt collectors.

44. The unsophisticated consumer knows that assignees may be affiliated with third-party debt collectors.

45. Additionally, the Letter directed Plaintiff to SEQUIUM's website which has a link to its "Contact Us" webpage.

46. SEQUIUM's "Contact Us" webpage provided a form that consumers may use to provide notification that a debt is disputed; however, SEQUIUM will not permit consumers to dispute their debt unless they provide a phone number and email address.

47. SEQUIUM cannot condition the processing of the consumer's dispute on her providing contact information. *See Bowse v. Portfolio Recovery Assocs., LLC*, 218 F. Supp. 3d 745, 752 (N.D. Ill. Nov. 2, 2016) (debt collector violates the FDCPA if it misinterprets a letter that disputes a debt as one that did not constitute a dispute).

48. The misleading and confusing representations in *Exhibit A* have an intimidating effect, making the unsophisticated consumer feel that she is in over her head and had better pay rather than question the demand for payment. *Muha v. Encore Receivable Mgmt.*, 558 F.3d 623, 629 (7th Cir. 2009).

49. The misleading and confusing representations on Sequium's website has an intimidating effect, making the consumer feel that she is in over her head rather than question the

demand for payment. *Id.*

50. Plaintiff was deceived, misled, and confused by the Letter.

51. By mailing the Letter, Defendants deprived Plaintiff of the right to truthful, non-misleading information (as viewed from the perspective of an unsophisticated consumer) concerning the effect of payment on the Debt.

VI. POLICIES AND PRACTICES COMPLAINED OF

52. It is Defendants' policy and practice to engage in practices which violate 15 U.S.C. §§ 1692e and 1692g by sending letters, such as *Exhibit A*, in their attempt to collect debts.

VII. CLASS ALLEGATIONS

53. This action is brought as a class action. Plaintiff brings this action individually and on behalf of all other persons similarly situated pursuant to Rule 23 of the Federal Rules of Civil Procedure.

54. Plaintiff seeks to certify a class pursuant to Fed. R. Civ. P. 23(a) and 23(b)(3).

55. *Class Definition.* This case is brought on behalf of a Class consisting of all natural persons to whom SEQUIUM mailed an initial written communication in the form of *Exhibit A*, during the period beginning on July 16, 2017 and ending on August 6, 2018 in an attempt to collect a defaulted credit card account.

56. The identities of the Class members, including their names and last known addresses, are readily ascertainable from SEQUIUM's business records.

57. *Class Claims.* The Class claims include all claims Class members may have for a violation of the FDCPA based the form letter mailed by SEQUIUM in the form of *Exhibit A*.

58. This action has been brought, and may properly be maintained, as a class action pursuant to the provisions of Rule 23 of the Federal Rules of Civil Procedure because there is a

well-defined community interest in the litigation:

- (a) **Numerosity.** On information and belief the Class is so numerous that joinder of all members would be impractical and includes at least 40 members.
- (b) **Common Questions Predominate.** Common questions of law and fact exist as to all members of the Class and those questions predominate over any questions or issues involving only individual class members. The principal class issue is whether Defendants violated the FDCPA when mailing letters created using the same or substantially similar form letter as was used to create *Exhibit A*.
- (c) **Typicality.** Plaintiff's claims are typical of Class Claims. Plaintiff and all Class members have claims arising from Defendants' common course of conduct in using and mailing the same form letter.
- (d) **Adequacy.** Plaintiff will fairly and adequately protect the interests of the Class members insofar as Plaintiff has no interest averse to, or conflict with, Class members. Plaintiff is committed to vigorously litigating this matter. Plaintiff has also retained counsel experienced in handling consumer lawsuits, complex legal issues, and class actions. Neither Plaintiff nor her counsel have any interests which might cause them not to vigorously pursue the instant class action lawsuit.

59. Certification of a class under Rule 23(b)(3) of the Federal Rules of Civil

Procedure is appropriate in that the questions of law and fact common to members of the Class predominate over any questions affecting an individual member, and a class action is superior to other available methods for the fair and efficient adjudication of the controversy.

60. Based on discovery and further investigation (including, but not limited to, Defendants' disclosure of class size and net worth), Plaintiff may, in addition to moving for class certification using modified definitions of the Class, Class claims, and the Class period, seek class certification only as to particular issues as permitted under Fed. R. Civ. P. 23(c)(4).

**VIII. CAUSE OF ACTION:
VIOLATION OF THE FAIR DEBT COLLECTION PRACTICES ACT**

61. Plaintiff realleges and incorporates by reference the allegations in the preceding paragraphs of this Complaint.

62. SEQUIUM is a "debt collector" as defined by 15 U.S.C. § 1692a(6).

63. JOHN DOES are each a "debt collector" as defined by 15 U.S.C. § 1692a(6).

64. The Letter is a "communication" as defined by 15 U.S.C. § 1692a(2).

65. The Debt is a "debt" as defined by 15 U.S.C. §1692a(5).

66. Plaintiff is a "consumer" as defined by 15 U.S.C. § 1692a(3).

67. Defendants' use and mailing of the Letter violated the FDCPA in one or more following ways:

- (a) Using false, deceptive, and misleading representations or means in connection with the collection of any debt in violation of 15 U.S.C. § 1692e including, but not limited to, violations of §§ 1692e(2) and (10); and
- (b) Failing to state the amount of the Debt in an unambiguous manner as required by 15 U.S.C. §§ 1692g(a)(1),(2), and (5) and 1692g(b).

VIII. PRAYER FOR RELIEF

68. WHEREFORE, Plaintiff respectfully requests the Court enter judgment against Defendants as follows:

- (i) An order certifying that the Cause of Action may be maintained as a class pursuant to Rule 23 of the Federal Rules of Civil Procedure including, but

not limited to, defining the Class, the class claims, appointing Plaintiff as the class representative, and the undersigned counsel to represent the Class;

- (ii) An award of actual damages for Plaintiff and the Class pursuant to 15 U.S.C. § 1692k(a)(2)(B), which includes damages to the extent the recovery of attorneys' fees and costs causes Plaintiff or the Class a negative tax consequence;
- (iii) An award of statutory damages for Plaintiff and the Class pursuant to 15 U.S.C. § 1692k(a)(2)(B);
- (iv) An incentive award for Plaintiff, to be determined by the Court, for Plaintiff's services on behalf of the Class;
- (v) Attorney's fees, litigation expenses, and costs pursuant to 15 U.S.C. § 1692k(a)(3); and
- (vi) For such other and further relief as may be just and proper.

IX. JURY DEMAND

Plaintiff hereby demands that this case be tried before a Jury.

Dated: July 16, 2018

s/ Andrew T. Thomasson

Philip D. Stern (NJ Bar # 045921984)
Francis R. Greene (IL Bar #00712094)
Andrew T. Thomasson (NJ Bar # 048362011)
STERN•THOMASSON LLP
150 Morris Avenue, 2nd Floor
Springfield, NJ 07081-1315
Telephone: (973) 379-7500
E-Mail: philip@sternthomasson.com
E-Mail: francis@sternthomasson.com
E-Mail: philip@sternthomasson.com

*Attorneys for Plaintiff, Jacqueline A.
Vandehey*

EXHIBIT “A”

Sequium Asset Solutions, LLC

1130 Northchase Parkway, Suite 150

Marietta, GA 30067

Toll-Free: 877-362-8766

Hours: Monday through Friday 9 AM – 5 PM Eastern Time Zone

Account Information	
Date:	08/04/17
Reference #:	0558
Creditor Name:	BLAZE CREDIT CARD
Creditor Account #:	7896
Total Due:	\$521.25

Dear Jackie A Vandehey:

This notice is being sent to you by a collection agency. Our records indicate that the account listed above has not been resolved. It is understandable that you have not been able to take care of this financial obligation or you would have already done so.

We encourage you to communicate with our office to reach an agreement that will resolve your account and put this matter behind you. Sequium Asset Solutions, LLC understands that each person's financial situation is different and we are confident we can assist you in resolving your outstanding balance.

You can contact us at the phone number listed above or you can email us at info@sequium.com.

If you would like to make a payment on your account we have three convenient ways to pay:

- **Pay by phone:** Please call the number listed above and speak with a representative.
- **Pay by Mail:** Please enclose the bottom portion of this letter with your payment.
- **Pay Client Directly:** Pay from an old statement or contact the creditor directly.

Thank you for your time and attention to this matter. We look forward to helping you resolve this outstanding obligation.

Sincerely,
Sequium Asset Solutions, LLC

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



	Secure, Convenient and Easy to Use. You can now pay online at: www.sequium.com We accept Visa & Mastercard
	Telephone Hours: Monday – Friday, 9 AM – 5 PM EST. Tel: 678-228-0000 • Fax: 678-228-0019
	Send Mail To: Sequium Asset Solutions, LLC 1130 Northchase Parkway, Suite 150 Marietta, GA 30067

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

Please see reverse side for important consumer rights information.

FRANC # 01013 / 22839 / 212005785572 / 0011420 / 0040

*** Detach Lower Portion And Return With Payment ***

P.O. Box 505
Linden, MI 48451-0505
CHANGE SERVICE REQUESTED

Jackie A Vandehey	
Reference #:	0558
Creditor Name:	BLAZE CREDIT CARD
Creditor Account #:	7896
Total Due:	\$521.25
Amount Enclosed:	\$



Jackie A Vandehey
917 Miller Ln
Kaukauna, WI 54130-3607

20175



Sequium Asset Solutions, LLC
1130 Northchase Parkway, Suite 150
Marietta, GA 30067

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

We are required under certain state laws to notify consumers of the following rights. This list does not include a complete list of rights consumers have under state and federal laws.

In California: "The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or www.ftc.gov."

In Colorado: FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE WWW.COAG.GOV/CAR. A consumer has the right to request in writing that a debt collector or collection agency cease further communication with the consumer. A written request to cease communication will not prohibit the debt collector or collection agency from taking any other action authorized by law to collect the debt. Our local address: Colorado Manager, Inc. 3025 South Parker Road, Suite 705, Aurora, CO 80014 Our local phone: 720-343-1993

In Massachusetts: If you have been contacted at your place of employment, you are entitled to the following notice:

Notice of Important Rights:

You have the right to make a written or oral request that telephone calls regarding your debt not be made to you at your place of employment. Any such oral requests will be valid for only ten (10) days unless you provide written confirmation of the request postmarked or delivered within seven (7) days of such request. You may terminate this request by writing to the collection agency.

15 Union Street, Lawrence, Massachusetts 01840
Office hours: Mon - Thurs: 8AM - 8PM, Fri: 8AM - 5PM, Sat: 8AM - 12PM

In Maine: Please be advised that if you wish to contact our office, our office hours are Mon-Thurs 8AM-9PM, Friday 8AM-6PM, and Saturday 8AM-12PM. Our toll free numbers are 1-877-362-8766 or 1-877-623-6287.

If you wish to contact us via mail, you can write to us at:
Sequium Asset Solutions, LLC
P. O. Box 725069
1130 Northchase Parkway, Suite 150
Marietta, Georgia 30067

In Tennessee: This collection agency is licensed by the Collection Service Board, State Department of Commerce and Insurance, 500 James Robertson Parkway, Nashville, Tennessee 37243.

In North Carolina: Our North Carolina Permit Number is 113093.

In New York City: Department of Consumer Affairs licensee number is 2047963-DCA.

In Minnesota: This collection agency is licensed by the Minnesota Department of Commerce.

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.)

Place an "X" in the appropriate box (required): Green Bay Division Milwaukee Division

I. (a) PLAINTIFFS

JACQUELINE A. VANDEHEY, individually and on behalf of all others similarly situated

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

(c) Attorneys (Firm Name, Address, and Telephone Number)

Stern Thomasson LLP
150 Morris Avenue, 2nd Floor
Springfield, NJ 07081-1315
(973) 379-7500

DEFENDANTS

SEQUIUM ASSET SOLUTIONS, LLC, a Georgia Limited Liability Company, and JOHN DOES

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)

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)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or 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 and 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 <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729 (a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities Employment <input type="checkbox"/> 446 Amer. w/Disabilities Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

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):

15 USC §1692 et seq.

Brief description of cause:

Claims under Fair Debt Collection Practices Act

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$
500,000.00

CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

07/16/2018

SIGNATURE OF ATTORNEY OF RECORD

s/ Andrew T. Thomasson

UNITED STATES DISTRICT COURT
for the
Eastern District of Wisconsin

JACQUELINE A. VANDEHEY, et al.

Plaintiff(s)

v.

SEQUIUM ASSET SOLUTIONS, LLC, a Georgia
Limited Liability Company, and JOHN DOES

Defendant(s)

Civil Action No. 1:18-cv-01086

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) SEQUIUM ASSET SOLUTIONS, LLC
c/o Its Registered Agent, Registered Agent Solutions, Inc.
901 South Whitney Way
Madison, Wisconsin 53711

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:

Stern Thomasson LLP
150 Morris Avenue, 2nd Floor
Springfield, NJ 07081-1315

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

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: [Class Action Filed Against Sequium Asset Solutions Over 'Confusing' Debt Collection Letter](#)
