UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IGOR VEDERNIKOV, *individually and on behalf of all others similarly situated*;

Plaintiff,

Civil Action No: 3:18-cv-15275

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

-v.-

DIVERSIFIED CONSULTANTS INC., ABSOLUTE RESOLUTIONS INVESTMENTS, LLC, JOHN DOES 1-25

Defendant(s).

Plaintiff Igor Vedernikov (hereinafter, "Plaintiff"), a New Jersey resident, brings this Class Action Complaint by and through his attorneys, Stein Saks PLLC, against Defendants Diversified Consultants Inc. (hereinafter "Defendant DCI") and Absolute Resolutions Investments, LLC (hereinafter "Defendant Absolute"), individually and on behalf of a class of all others similarly situated, pursuant to Rule 23 of the Federal Rules of Civil Procedure, based upon information and belief of Plaintiff's counsel, except for allegations specifically pertaining to Plaintiff, which are based upon Plaintiff's personal knowledge.

INTRODUCTION/PRELIMINARY STATEMENT

1. Congress enacted the Fair Debt Collection Practices Act (hereinafter, "the FDCPA" or "Act") in 1977 in response to the "abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many debt collectors." 15 U.S.C. §1692(a). At that time,

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Congress was concerned that "abusive debt collection practices contribute to the number of personal bankruptcies, to material instability, to the loss of jobs, and to invasions of individual privacy." *Id.* Congress concluded that "existing laws...[we]re inadequate to protect consumers," and that "the effective collection of debts" does not require "misrepresentation or other abusive debt collection practices." 15 U.S.C. §§ 1692(b) & (c).

2. Congress explained that the purpose of the Act was not only to eliminate abusive debt collection practices, but also to "insure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged." *Id.* § 1692(e). After determining that the existing consumer protection laws ·were inadequate ~ *Id.* § 1692(b), Congress gave consumers a private cause of action against debt collectors who fail to comply with the Act. *Id.* § 1692k.

JURISDICTION AND VENUE

3. The Court has jurisdiction over this class action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1692 et. seq. The Court has pendent jurisdiction over all State law claims in this action pursuant to 28 U.S.C. § 1367(a).

4. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(2) as this is where a substantial part of the events or omissions giving rise to the claim occurred.

NATURE OF THE ACTION

Plaintiff brings this class action on behalf of a class of New Jersey consumers under§
 1692 et seq. of Title 15 of the United States Code, commonly referred to as the Fair Debt
 Collections Practices Act ("FDCPA"), and

6. Plaintiff is seeking damages and declaratory relief.

PARTIES

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Plaintiff is a resident of the State of New Jersey, County of Middlesex, residing at 8
 Hansen Road, Old Bridge, New Jersey 08857.

Diversified Consultants, Inc. 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 10550 Deerwood Park Blvd, Ste
 708, Jacksonville, Florida, 32256.

9. Upon information and belief, Defendant DCI 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.

10. Absolute Resolutions Investments, LLC 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 6602 El Cajon Blvd, Ste 200, San Diego, CA, 92215.

11. Upon information and belief, Defendant Absolute 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.

12. 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

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

14. The Class consists of:

a. all individuals with addresses in the State of New Jersey;

- b. to whom Defendant DCI sent an initial collection letter attempting to collect a consumer debt on behalf of Defendant Absolute;
- c. that deceives the consumer by omitting the complete and accurate requirement that a consumer's dispute of a debt must be in writing, as provided for under §1692g (the "G-Notice");
- d. which letter was sent on or after a date one (1) year prior to the filing of this action and on or before a date twenty-one (21) days after the filing of this action.

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

16. Excluded from the Plaintiff Class are the Defendants and all officer, members, partners, managers, directors and employees of the Defendants and their respective immediate families, and legal counsel for all parties to this action, and all members of their immediate families.

17. There are questions of law and fact common to the Plaintiff Class, which common issues predominate over any issues involving only individual class members. The principal issue is whether the Defendants' written communications to consumers, **in the forms attached as Exhibit A**, violate 15 U.S.C. §§ 1692e & 1692g.

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

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19. 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. <u>Numerosity:</u> The Plaintiff is informed and believes, and on that basis alleges, that the Plaintiff Class defined above is so numerous that joinder of all members would be impractical.
- b. <u>Common Questions Predominate:</u> Common questions of law and fact exist as to all members of the Plaintiff Class and those questions predominate over any questions or issues involving only individual class members. The principal issue is whether the Defendants' written communications to consumers, in the forms attached as Exhibit A violate 15 U.S.C. §§ 1692e & 1692g.
- <u>Typicality:</u> The Plaintiff's claims are typical of the claims of the class members.
 The Plaintiff and all members of the Plaintiff Class have claims arising out of the Defendants' common uniform course of conduct complained of herein.
- d. <u>Adequacy:</u> The Plaintiff will fairly and adequately protect the interests of the class members insofar as Plaintiff has no interests that are adverse to the absent class members. The 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 the Plaintiff nor his counsel have any interests which might cause them not to vigorously pursue the instant class action lawsuit.
- e. <u>Superiority:</u> A class action is superior to the other available means for the fair and efficient adjudication of this controversy because individual joinder of all

members would be impracticable. Class action treatment will permit a large number of similarly situated persons to prosecute their common claims in a single forum efficiently and without unnecessary duplication of effort and expense that individual actions would engender.

20. Certification of a class under Rule 23(b)(3) of the Federal Rules of Civil Procedure is also appropriate in that the questions of law and fact common to members of the Plaintiff 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.

21. Depending on the outcome of further investigation and discovery, Plaintiff may, at the time of class certification motion, seek to certify a class(es) only as to particular issues pursuant to Fed. R. Civ. P. 23(c)(4).

FACTUAL ALLEGATIONS

22. Plaintiff repeats, reiterates and incorporates the allegations contained in paragraphs numbered above herein with the same force and effect as if the same were set forth at length herein.

23. Some time prior to July 11, 2018, an obligation was allegedly incurred to WebBank.

24. The WebBank obligation arose out of a transaction where Plaintiff used the WebBank funds to purchase items which were primarily for personal, family or household purposes.

25. The alleged WebBank obligation is a "debt" as defined by 15 U.S.C.§ 1692a(5).

26. WebBank is a "creditor" as defined by 15 U.S.C.§ 1692a(4).

27. Defendant Absolute, the subsequent owner of the WebBank debt, contracted with the Defendant DCI to collect the alleged debt.

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

Violation – July 11, 2018 Collection Letter

29. On or about July 11, 2018, Defendant DCI sent Plaintiff an initial contact notice (the "Letter") regarding the alleged debt owed. A true and accurate copy of the Letter is attached as Exhibit A.

30. When a debt collector solicits payment from a consumer, it must, within five days of an initial communication 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 the 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. 15 U.S.C. § 1692g(a).

31. The FDCPA further provides 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

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debt collector shall cease collection . . . until the debt collector obtains verification of the debt . . . and a copy of such verification is mailed to the consumer by the debt collector." 15 U.S.C. § 1692g(b).

32. Specifically, with regard to section 1692g(a)(3), the Third Circuit has made clear that "any dispute, to be effective, must be in writing." *Graziano v. Harrison*, 950 F.2d 107, 112 (3d Cir. 1991).

33. Thus, within the Third Circuit, a debt collector's written disclosure must convey the requirement that a consumer must dispute a debt <u>in writing</u> under \$1692g(a)(3).

34. [I]n order to comply with the requirements of § 1692g, more is required than the mere inclusion of the statutory debt validation notice in the debt collection letter—the required notice must also be conveyed effectively to the debtor." *Wilson v. Quadramed Corp.*, 225 F.3d 350, 354 (3d Cir. 2000), as amended (Sept. 7, 2000) (citations omitted). A debt collector violates the FDCPA when a validation notice is "overshadowed" or "contradicted by other portions of the communication. Id. at 111; Wilson, 225 F.3d at 354.

35. The Letter does not meet the required guidelines of the FDCPA, as interpreted by the Third Circuit, because it falsely omits the requirement of the "G Notice" in the first sentence by leaving out the requirement that a consumer must dispute in writing.

36. In omitting the writing requirement, Defendant falsely communicates the consumer's requirements under the FDCPA.

37. Furthermore, the second sentence of the "G Notice" begins: "If" you notify us in writing..., implying that the writing requirement is voluntary. When coupled with the failure of the first sentence to contain any mention of the word "writing," the least sophisticated consumer would be confused as to what his actual requirements were for properly disputing the debt.

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38. Pursuant to section 1692g(a)(3), the Third Circuit has made clear that "<u>any dispute,</u> <u>to be effective, must be in writing</u>." *Graziano v. Harrison*, 950 F.2d 107, 112 (3d Cir. 1991). Thus, a written disclosure that fails to convey the requirement that a consumer must dispute a debt in writing falls afoul of the FDCPA's requirements.

39. This false and inaccurate portion of the Letter is misleading because it fails to advise Plaintiff of the proper method for exercising his dispute and validation rights under the FDCPA.

40. Plaintiff sustained an informational injury as he was not fully apprised of his rights and responsibilities necessary to properly exercise his options under §1692g.

41. As a result of Defendants false statements, Plaintiff effectively waived his rights to this statutorily available information because he was not properly informed of the "G-Notice" requirements set forth in the FDCPA, as interpreted in the Third Circuit.

42. As a result of Defendants deceptive, misleading and false debt collection practices, Plaintiff has been damaged.

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

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

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

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

46. Defendants violated §1692e:

- a. As the Letter it is open to more than one reasonable interpretation, at least one of which is inaccurate.
- b. By making a false and misleading representation in violation of §1692e(10).

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

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

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

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

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

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

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portion thereof, the debt will be assumed to be valid by the debtcollector;

- 4. A statement that the consumer notifies the debt collector in writing within 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.

51. The Defendants violated 15 U.S.C. §1692g, by falsely misstating the consumer's rights by omitting the requirement that he must request validation and make any dispute of the debt in writing.

52. 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

53. 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 Igor Vedernikov, individually and on behalf of all others similarly situated, demands judgment from Defendants Diversified Consultants Inc., and Absolute Resolutions Investments, LLC as follows:

1. Declaring that this action is properly maintainable as a Class Action and certifying

Plaintiff as Class representative, and Yaakov Saks, 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: Hackensack, New Jersey October 24, 2018

/s/ Yaakov Saks

By: Yaakov Saks, Esq. Stein Saks, PLLC 285 Passaic Street Hackensack, NJ 07601 Phone: 201-282-6500 Fax: 201-282-6501 Email: ysaks@steinsakslegal.com Attorneys for Plaintiff Case 3:18-cv-15275 Document 1 Filed 10/24/18 Page 13 of 13 PageID: 13

JS 44 (Rev. 06/17) Case 3:18-cv-15275 Decument Cover Sheet 8 Page 1 of 1 PageID: 14

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			DEFENDANTS			
IGOR VEDERNIKOV			DEFENDANTS DIVERSIFIED CONSULTANTS INC., ABSOLUTE RESOLUTIONS INVESTMENTS, LLC, JOHN DOES 1-25			
(b) County of Residence of	of First Listed Plaintiff	liddlesex	County of Residence	of First Listed Defendant		
(E	XCEPT IN U.S. PLAINTIFF CA	SES)		(IN U.S. PLAINTIFF CASES C	,	
			NOTE: IN LAND CO THE TRACT	ONDEMNATION CASES, USE Τ Γ OF LAND INVOLVED.	HE LOCATION OF	
(c) Attorneys (Firm Name, J Yaakov Saks- Stein Saks 285 Passaic Street, Haci	s, PLLC	r)	Attorneys (If Known)			
(201) 282-6500 ext 101						
II. BASIS OF JURISDI	CTION (Place an "X" in O	ne Box Only)		RINCIPAL PARTIES	(Place an "X" in One Box for Plaintifj	
□ 1 U.S. Government			(For Diversity Cases Only) P	TF DEF	and One Box for Defendant) PTF DEF	
Plaintiff	(U.S. Government)	Not a Party)	Citizen of This State	1 1 Incorporated or Pr of Business In T		
□ 2 U.S. Government Defendant	□ 4 Diversity (Indicate Citizensh	ip of Parties in Item III)	Citizen of Another State	2 D 2 Incorporated and I of Business In A		
			Citizen or Subject of a Foreign Country	3 🗇 3 Foreign Nation		
IV. NATURE OF SUIT		ly) RTS	EODEEI/TUDE/DENIAL/TV	Click here for: Nature of BANKRUPTCY	of Suit Code Descriptions. OTHER STATUTES	
□ 110 Insurance	PERSONAL INJURY	PERSONAL INJURY	FORFEITURE/PENALTY ☐ 625 Drug Related Seizure	□ 422 Appeal 28 USC 158	□ 375 False Claims Act	
□ 120 Marine □ 130 Miller Act	 310 Airplane 315 Airplane Product 	365 Personal Injury -	of Property 21 USC 881	□ 423 Withdrawal 28 USC 157	🗖 376 Qui Tam (31 USC	
140 Negotiable Instrument	Liability	Product Liability 367 Health Care/	D 690 Otter		3729(a)) 400 State Reapportionment	
150 Recovery of Overpayment & Enforcement of Judgment	□ 320 Assault, Libel & Slander	Pharmaceutical Personal Injury		PROPERTY RIGHTS ☐ 820 Copyrights	 410 Antitrust 430 Banks and Banking 	
 151 Medicare Act 152 Recovery of Defaulted 	330 Federal Employers' Liability	Product Liability 368 Asbestos Personal		 830 Patent 835 Patent - Abbreviated 	□ 450 Commerce □ 460 Deportation	
Student Loans	□ 340 Marine	Injury Product		New Drug Application	470 Racketeer Influenced and	
(Excludes Veterans) □ 153 Recovery of Overpayment	345 Marine Product Liability	Liability PERSONAL PROPERT	Y LABOR	840 Trademark SOCIAL SECURITY	Corrupt Organizations	
of Veteran's Benefits 160 Stockholders' Suits	 350 Motor Vehicle 355 Motor Vehicle 	 370 Other Fraud 371 Truth in Lending 	710 Fair Labor Standards Act	 861 HIA (1395ff) 862 Black Lung (923) 	 490 Cable/Sat TV 850 Securities/Commodities/ 	
190 Other Contract	Product Liability	□ 380 Other Personal	720 Labor/Management	□ 863 DIWC/DIWW (405(g))	Exchange	
 195 Contract Product Liability 196 Franchise 	360 Other Personal Injury	Property Damage 385 Property Damage	Relations 740 Railway Labor Act 	 864 SSID Title XVI 865 RSI (405(g)) 	 890 Other Statutory Actions 891 Agricultural Acts 	
	362 Personal Injury - Medical Malpractice	Product Liability	751 Family and Medical Leave Act		 893 Environmental Matters 895 Freedom of Information 	
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS		FEDERAL TAX SUITS	Act	
 210 Land Condemnation 220 Foreclosure 	 440 Other Civil Rights 441 Voting 	Habeas Corpus: 463 Alien Detainee	791 Employee Retirement Income Security Act	870 Taxes (U.S. Plaintiff or Defendant)	 896 Arbitration 899 Administrative Procedure 	
230 Rent Lease & Ejectment	442 Employment	510 Motions to Vacate		871 IRS—Third Party	Act/Review or Appeal of	
 240 Torts to Land 245 Tort Product Liability 	□ 443 Housing/ Accommodations	Sentence 530 General		26 USC 7609	Agency Decision 950 Constitutionality of	
290 All Other Real Property	445 Amer. w/Disabilities - Employment	535 Death Penalty Other:	IMMIGRATION 462 Naturalization Application	1	State Statutes	
	☐ 446 Amer. w/Disabilities - Other	 540 Mandamus & Other 550 Civil Rights 	465 Other Immigration Actions	-		
	□ 448 Education	555 Prison Condition	Actions			
		560 Civil Detainee - Conditions of				
		Confinement				
		Remanded from D Appellate Court		er District Litigation	- Litigation -	
	Cite the U.S. Civil Sta	tute under which you are	(specify filing (Do not cite jurisdictional sta		Direct File	
VI. CAUSE OF ACTIO	DN Brief description of ca Improper language	use:	Collection Practices Act			
VII. REQUESTED IN COMPLAINT:		IS A CLASS ACTION	DEMAND \$	CHECK YES only JURY DEMAND	if demanded in complaint: X Yes □No	
VIII. RELATED CASI	E(S)					
IF ANY	(See instructions):	JUDGE		DOCKET NUMBER		
DATE		SIGNATURE OF ATTC	DRNEY OF RECORD			
10/24/2018 For office use only		/s/Yaakov Saks				
RECEIPT # AN	MOUNT	APPLYING IFP	JUDGE	MAG. JUE	DGE	
Print	Save As				Reset	

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EXHIBIT A

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PO BOX 1391 SOUTHGATE, MI 48195-0391

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07/11/18

Original Creditor: WebBank
Original Account Number: XXXXXXXXXXXX6915
Current Creditor: ABSOLUTE RESOLUTIONS INVESTMENTS,
LĻC
Current Account Number:
Agency Reference Number:
Balance: \$736.85

This notice is to inform you that ABSOLUTE RESOLUTIONS INVESTMENTS, LLC has submitted the above referenced account to Diversified Consultants, Inc. to service on their behalf.

Unless you notify this office within 30 days of 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.

Calls to or from this company may be monitored or recorded.

Igor Vedernikov

Old Bridge, NJ 08857-1815

8 Hansen Rd

This is an attempt to collect a debt. Any and all information obtained will be used for that purpose. This communication is from a debt collector.

Sincerely, Diversified Consultants, Inc. PO Box 551268 Jacksonville, FL 32255-1268, 877-554-4313



Toll Free: 877-554-4313

(L)

Hours of Operation:	
Monday - Thursday:	8 A
Friday:	8 A
Saturday:	9 A

Operation:	
Thursday:	8 AM - 11 PM EST
-	8 AM - 10 PM EST
	9 AM – 4 PM EST

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Pay Your Bill Online at: www.dcicollect.com

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Detach and Return with Payment To pay by credit card, please complete the information below:	00107 Amount Due: \$736.85
Check One: 🛛 VISA 🖵 MasterCard 🖓 AMEX 🖓 Check	Amount Due, \$750.05
Card Number:	Amount Submitted:
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Original Account Number: XXXXXXXXXX6915	DIVERSIFIED CONSULTANTS, INC.
Current Creditor: ABSOLUTE RESOLUTIONS INVESTMENTS,	PO BOX 551268
	JACKSONVILLE, FL 32255-1268
Current Account Number:	
Balance: \$736.85	F SMARLY INVENT HOURS (MILE) (MILE) (MILE) (MILE) (MILE) (MILE)
877-554-4313	

ClassAction.org

This complaint is part of ClassAction.org's searchable class action lawsuit database and can be found in this post: <u>Class Action: Two Debt Collectors Misstated Consumer's Rights in Collection Notice</u>