

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

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NIKIESHA SMITH, on behalf of herself  
and all other similarly situated

Case No.: 1:23-cv-14255

Plaintiff(s),

vs.

WAYPOINT RESOURCE GROUP, LLC

Defendant.

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**DEFENDANT WAYPOINT RESOURCE GROUP, LLC'S  
NOTICE OF REMOVAL**

**PLEASE TAKE NOTICE** that Defendant Waypoint Resource Group, LLC (“Defendant” or “Waypoint”), by and through its undersigned counsel, respectfully notifies this Court of the removal of the above-captioned matter from the Superior Court of New Jersey, Camden County, Law Division, identified by docket number CAM-L-002135-23 (“State Court Action”) to the United States District Court for District of New Jersey, and shows the Court as follows:

1. Plaintiff Nikiesha Smith (“Plaintiff”) commenced the State Court Action by filing a Complaint against Defendant in the Superior Court of New Jersey in Camden County, on July 25, 2023.
2. Pursuant to 28 U.S.C. § 1446(a), a true and accurate copy of the Summons is attached hereto as “Exhibit A” and a true and accurate copy of the Complaint is attached hereto as “Exhibit B.”
3. Defendant was served with the Complaint on August 1, 2023, via personal service.

4. Plaintiff brought this class action against Defendant for alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* (“FDCPA”) and also seeks a Declaratory Judgment under the New Jersey Declaratory Judgment Act.

FEDERAL QUESTION JURISDICTION

5. This Court has original jurisdiction over Plaintiff’s FDCPA claims pursuant to 28 U.S.C. § 1331 which provides: “The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.”

6. Removal of this action is proper under 28 U.S.C. § 1441(a), which provides, in pertinent part, that “any civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is pending.”

7. Plaintiff alleges Defendant violated the FDCPA, 15 USC §1692e; §1692e(2)(A); §1692e(10); and §1692f.

8. In her Complaint, Plaintiff alleges that “*Defendant violated 15 USC §1692e by using false, deceptive or misleading representation or means in connection with their attempts to collect debts from Plaintiff and other similarly situated.*” See **Exhibit B** at ¶ 63.

9. In her Complaint, Plaintiff alleges that “*Because Defendant omitted information from its February 22, 2023 letter as described herein, it used false, deceptive, and misleading means in connection with the collection of the debt.*” See **Exhibit B** at ¶ 65.

10. In her Complaint, Plaintiff alleges that “*Defendants’ false, misleading and deceptive statement(s) is material to the least sophisticated consumer.*” See **Exhibit B** at ¶ 67.

11. Plaintiff claims that, as a result of Defendant’s alleged violation of the FDCPA,

there are common questions of fact, including “*Whether Plaintiff and the Class have been injured by the Defendants’ conduct*” and “*Whether Plaintiff and the Class have sustained damages and are entitled to restitution as a result of Defendant’s wrongdoing and, if so, what is the proper measure and appropriate statutory formula to be applied in determining such damages and restitution.*” See **Exhibit B** at ¶ 13.

12. Plaintiff claims that, as a result of Defendant’s alleged violation of the FDCPA, she and the class are entitled to statutory damages plus costs and attorney’s fees. See **Exhibit B** after ¶ 76 (the WHEREFORE demand for relief).

13. “Article III grants federal courts the power to redress **harms that defendants cause plaintiffs**, not a freewheeling power to hold defendants accountable for legal infractions.” *TransUnion LLC v. Ramirez*, 141 S. Ct. 2190, 2205 (2021) (quoting *Casillas v. Madison Avenue Assocs. Inc.*, 926 F. 3d 329, 332 (7th Cir. 2019)) (emphasis added).

14. “The violation of a procedural right granted by statute can be sufficient in some circumstances to constitute injury in fact, as required for constitutional standing, and a plaintiff in such a case need not allege any additional harm beyond the one Congress has identified. U.S. Const. art. 3, § 2, cl. 1.” *Thomas v. John A. Youderian Jr., LLC*, 232 F. Supp. 3d 656 (D.N.J. 2017).

15. *Napolitano v. Ragan & Ragan*, No. CV 15-2732 (FLW), 2017 WL 3535025, at \*6–7 (D.N.J. Aug. 17, 2017) states “it is evident that Plaintiff alleges a particularized and concrete injury, namely that the debt collection letter sent to Plaintiff was allegedly deceptive by falsely implying that an attorney had meaningfully reviewed the case. Plaintiff avers that particular conduct violates the FDCPA. Indeed, Plaintiff has a substantive, and not merely procedural, statutory right under the FDCPA to be free from receiving allegedly false or deceptive information

relating to the collection of a debt. Because of the alleged violation, Plaintiff was placed at risk of economic injury by potentially being deceived. Accordingly, Plaintiff has standing to bring suit.”

16. Plaintiff complains of a violation of a federal statute. While Plaintiff strategically omits an allegation of confirmed actual injury in Complaint, she does admit the *question* of actual injury exists. Plaintiff expressly alleges there are common questions of fact, including, “*Whether Plaintiff and the Class have been injured by the Defendants’ conduct*” and “*Whether Plaintiff and the Class have sustained damages and are entitled to restitution as a result of Defendant’s wrongdoing ....*” See **Exhibit B** at ¶ 13 (emphasis added).

17. It is inconsistent and illogical for Plaintiff to allege that specific conduct caused *the question of* actual injury, but then argue the same specific conduct did *not* cause actual injury for purposes of standing. Therefore, Plaintiff has sufficiently alleged that she has suffered actual injury caused by the alleged violations of the FDCPA to establish Article III standing in this case.

18. For these reasons, federal question jurisdiction exists over this action because the allegations asserted by Plaintiff in the Complaint involve questions that will require resolution of significant, disputed issues arising under federal law. This case qualifies for federal question jurisdiction and is removable because Plaintiff’s Complaint alleges claims under, and requires a ruling on, the FDCPA.

19. Pursuant to 28 U.S.C. § 1441(b), removal is proper irrespective of the citizenship or residence of the parties.

#### SUPPLEMENTAL JURISDICTION

20. This Court also exercises supplemental jurisdiction over Plaintiff’s claim for the request for a Declaratory Judgment pursuant to 28 U.S.C. § 1367, which states “in any civil action of which the district courts have original jurisdiction, the district courts shall have

supplemental jurisdiction over all other claims that are so related to claims in the action within such original jurisdiction that they form part of the same case or controversy under Article III of the United States Constitution.”

21. Accordingly, to the extent Plaintiff may plausibly allege additional claims that are not subject to the Court’s federal question jurisdiction, the Court maintains jurisdictional authority over such claims pursuant to 28 U.S.C. § 1367 by virtue of Plaintiff’s claims under the FDCPA.

#### VENUE

22. The Superior Court of New Jersey in Camden County is located in the District of New Jersey, 28 U.S.C. § 89(b). Venue is proper because this is the “district and division embracing the place where the action is pending.” *See* 28 U.S.C. § 1441(a) and 1446(a).

#### NOTICE

23. The instant Notice of Removal is being filed within the thirty (30) days of Defendant having been served with the Summons and Complaint. Therefore, pursuant to 28 U.S.C. § 1446(b), the instant Notice of Removal is timely.

24. Defendant will give written notice of the filing of this Notice of Removal to all adverse parties, as required by 28 U.S.C. § 1446(d).

25. Defendant will file a true and accurate copy of this Notice of Removal with the Superior Court of New Jersey in Camden County, as required by 28 U.S.C. § 1446(d).

26. If any questions arise as to the propriety of the removal of this action, Defendant requests the opportunity to present a brief and argument in support of its position that this case is removable.

27. Upon information and belief, the contents of **Exhibit A** and **Exhibit B** constitute the entire file of the action pending in the state court as required pursuant to 28 U.S.C. § 1446(a).

**WHEREFORE**, Defendant respectfully requests that the aforementioned State Court Action, now pending in the Superior Court of New Jersey in Camden County be removed to the United States District Court for the District of New Jersey.

DATED: September 1, 2023

**LIPPES MATHIAS LLP**

s/ Sean M. O'Brien

Sean M. O'Brien, Esquire

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# EXHIBIT B

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NIKIESHA SMITH, on behalf of herself and all  
others similarly situated,

Plaintiff(s),

-against-

WAYPOINT RESOURCE GROUP, LLC; and  
JOHN DOES 1-25,

Defendant(s).

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
CAMDEN COUNTY

CIVIL ACTION

**CLASS ACTION COMPLAINT AND  
DEMAND FOR JURY TRIAL**

Plaintiff, NIKIESHA SMITH, on behalf of herself and all others similarly situated (hereinafter “Plaintiff”) by and through her undersigned attorney(s), alleges against the above-named Defendants, WAYPOINT RESOURCE GROUP, LLC (“WAYPOINT”); JOHN DOES 1-25, their employees, agents, and successors (collectively “Defendants”) the following:

**PRELIMINARY STATEMENT**

1. Plaintiff brings this action for statutory damages and declaratory relief arising from the Defendants' violation of 15 U.S.C. § 1692 *et seq.*, the Fair Debt Collection Practices Act (hereinafter “FDCPA”), which prohibits debt collectors from engaging in abusive, deceptive and unfair practices.



### **JURISDICTION AND VENUE**

2. This Court has jurisdiction over this action pursuant to 15 U.S.C. § 1692k(d). This is an action for violations of 15 U.S.C. § 1692 *et seq.*

3. Venue is proper in Camden County because the Plaintiff resides there, and the acts of the Defendant that give rise to this action occurred in substantial part, in Camden County.

### **DEFINITIONS**

4. As used in reference to the FDCPA, the terms “creditor,” “consumer,” “debt,” and “debt collector” are defined in § 803 of the FDCPA and 15 U.S.C. § 1692a.

### **PARTIES**

5. The FDCPA, 15 U.S.C. § 1692 *et seq.*, which prohibits certain debt collection practices provides for the initiation of court proceedings to enjoin violations of the FDCPA and to secure such equitable relief as may be appropriate in each case.

6. Plaintiff is a natural person, a resident of Camden County, New Jersey and is a “Consumer” as defined by 15 U.S.C. § 1692a(3).

7. WAYPOINT maintains a location at 1065 Levoy Drive, Salt Lake City, Utah 84123.

8. WAYPOINT uses the instrumentalities of interstate commerce or the mails to engage in the principal business of collecting debt and/or to regularly engage in the collection or attempt to collect debt asserted to be due or owed to another.

9. WAYPOINT is a “Debt Collector” as that term is defined by 15 U.S.C. § 1692(a)(6).

10. John Does 1-25, are currently unknown Defendants whose identities will be obtained in discovery and at that time will be made parties to this action. Plaintiff's claims against the currently unknown Defendants arise out of the same transaction, occurrence or series of transactions arising from known Defendant's actions and are due to common questions of law and fact whose joinder will promote litigation and judicial efficiency.

### **CLASS ACTION ALLEGATIONS**

11. Plaintiff brings this action as a state-wide class action, pursuant to Rule 4:32 of the New Jersey Rules of Court, on behalf of herself and all New Jersey consumers and their successors in interest (the "Class"), who WAYPOINT collected or attempted to collect a debt from, in violation of the FDCPA, as described in this Complaint.

12. This Action is properly maintained as a class action. The Class is initially defined as:

- All New Jersey consumers who were sent initial letters and/or notices from WAYPOINT attempting to collect a debt on behalf of COMCAST COMMUNICATIONS (See Exhibit A), which included the alleged conduct and practices described herein.

The Class period begins one year to the filing of this Action.

The class definition may be subsequently modified or refined.

13. The Class satisfies all the requirements of Rule 4:32 for maintaining a class action:

- Upon information and belief, the Class is so numerous that joinder of all members is impracticable because there may be hundreds and/or thousands of persons who were sent debt collection letters and/or notices from the Defendants that violate specific provisions of the FDCPA. Plaintiff is complaining of a standard form letter and/or notice. (See **Exhibit A**, except

that the undersigned attorney has redacted the financial account numbers and/or personal identifiers in an effort to protect Plaintiff's privacy);

- There are questions of law and fact which are common to the Class and which predominate over questions affecting any individual Class member. These common questions of law and fact include, without limitation:
  - a. Whether the Defendants violated various provisions of the FDCPA;
  - b. Whether Plaintiff and the Class have been injured by the Defendants' conduct;
  - c. Whether Plaintiff and the Class have sustained damages and are entitled to restitution as a result of Defendants' wrongdoing and if so, what is the proper measure and appropriate statutory formula to be applied in determining such damages and restitution; and
  - d. Whether Plaintiff and the Class are entitled to declaratory and/or injunctive relief.
- Plaintiff's claims are typical of the Class, which all arise from the same operative facts and are based on the same legal theories.
- Plaintiff has no interest adverse or antagonistic to the interest of the other members of the Class.
- Plaintiff will fairly and adequately protect the interest of the Class and has retained experienced and competent attorneys to represent the Class.

- A Class Action is superior to other methods for the fair and efficient adjudication of the claims herein asserted. Plaintiff anticipates that no unusual difficulties are likely to be encountered in the management of this class action.
- A Class Action will permit large numbers of similarly situated persons to prosecute their common claims in a single forum simultaneously and without the duplication of effort and expense that numerous individual actions would engender. Class treatment will also permit the adjudication of relatively small claims by many Class members who could not otherwise afford to seek legal redress for the wrongs complained of herein. Absent a Class Action, class members will continue to suffer losses of statutory protected rights as well as monetary damages.
- Defendants have acted on grounds generally applicable to the entire Class, thereby making appropriate final injunctive relief or corresponding declaratory relief with respect to the Class as a whole.

### **STATEMENT OF FACTS**

14. Plaintiff is at all times to this lawsuit, a “consumer” as that term is defined by 15 U.S.C. § 1692a(3).

15. Sometime prior to February 22, 2023, Plaintiff allegedly incurred a financial obligation to COMCAST COMMUNICATIONS (“COMCAST”).

16. The obligation arose out of a transaction, in which money, property, insurance or services, which are the subject of the transactions, was primarily for personal, family or household purposes.

17. Plaintiff incurred the COMCAST obligation in connection with a residential account.

18. Plaintiff did not incur the COMCAST obligation for business purposes.

19. The COMCAST obligation is a “debt” as defined by 15 U.S.C. § 1692a(5).

20. On or before February 22, 2023, COMCAST assigned the COMCAST obligation to WAYPOINT for the purpose of collections.

21. At the time the obligation was assigned to WAYPOINT, the obligation was in default.

22. WAYPOINT caused to be delivered to Plaintiff a letter dated February 22, 2023, which was addressed to Plaintiff regarding the COMCAST obligation. See **Exhibit A**, which is fully incorporated herein by reference.

23. The February 22, 2023 letter is a “communication” as defined by 15 U.S.C. § 1692a(2).

24. The February 22, 2023 letter was Defendant’s initial written communication to Plaintiff.

25. Pursuant to 15 U.S.C. § 1692l(d) of the FDCPA, “Except as provided in section 1029(a) of the Consumer Financial Protection Act of 2010 (12 U.S.C. 5519(a)), the Bureau may prescribe rules with respect to the collection of debts by debt collectors, as defined in this subchapter.”

26. Accordingly, the CFPB prepared and issued rules prescribed under 12 CFR § 1006 et seq., commonly referred to as Regulation F.

27. The February 22, 2023 letter was purportedly generated in order to comply with Regulation F, effective November 30, 2021.

28. Regulation F established a Model Form initial collection letter which if used properly by a debt collector would satisfy regulatory compliance with 12 CFR § 1006.34(d)(2)(i).

29. While use of the Model Form initial collection letter might be sufficient to provide the information required by 12 CFR § 1006.34, it does not guarantee compliance with the requirements of 15 U.S.C. § 1692g or any other section of the FDCPA.

30. As a result, just because a debt collector uses the Model Form initial collection letter that purports to comply with 12 CFR § 1006.34, it does not mean that a debt collector has complied with provisions of the FDCPA.

31. Moreover, even if use of the Model Form initial collection letter might provide a safe harbor for some of section 1692g's statutory requirements, a safe harbor for the form of provided information is different from a safe harbor for the substance of that information.

32. Thus, use of the Model Form initial collection letter only provides coverage for regulatory compliance (with the CFPB) and not statutory compliance. See 12 CFR § 1006.34(d)(2)(i).

33. Upon receipt, Plaintiff read the February 22, 2023 letter.

34. WAYPOINT admitted that it was a debt collector in its February 22, 2023 letter:

**Waypoint Resource Group LLC is a debt collector.** We are trying to collect a debt that you owe to Comcast Communications. We will use any information you give us to help collect the debt.

35. Regulation F and 15 U.S.C. § 1692g(a)(1) of the FDCPA requires that a debt collector provide the Plaintiff with a notice that effectively conveys the amount of the debt.

36. Defendant's February 22, 2023 letter presented Plaintiff with the following information concerning the balance claimed to be owed on the COMCAST obligation:

As of February 11, 2022, you owed:	\$1,504.31
Between February 11, 2022 and today:	

You were charged this amount in interest:	+	\$0.00
You were charged this amount in fees:	+	\$490.00
You paid or were credited this amount toward the debt:	-	\$0.00
<b>Total amount of the debt now:</b>		<b>\$1,994.31</b>

37. Upon information and belief, Plaintiff did not incur fees on the COMCAST obligation, but rather, was assessed an amount for unreturned equipment.

38. Upon information and belief, Plaintiff could return the equipment and then receive a full credit for same.

39. By withholding that information from Plaintiff, Defendant withheld a material term from Plaintiff which rendered the February 22, 2023 letter confusing for him to understand the nature of the COMCAST obligation as well the true amount of the debt.

40. Defendant's letter failed to effectively convey the amount of the debt and/or presented the amount of the debt in a confusing manner.

41. Defendant's February 22, 2023 letter caused Plaintiff to be confused.

42. Defendant's February 22, 2023 letter advised Plaintiff of the following:

**NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION.**

43. The only "important information" contained on the reverse side of the Defendant's February 22, 2023 letter was:

WAYPOINT RESOURCE GROUP, LLC

44. As the reverse side of the February 22, 2023 letter did not include "important information", Plaintiff was left wondering what information Defendant failed to include.

45. Regulation F allows a debt collector to include any disclosures specifically required by other applicable law or any disclosures specifically required by other applicable law in the Model Letter. See 1006.34(d)(3)(iv)(A)

46. Disclosing its name on the reverse of the February 22, 2023 letter is not one of the pieces of information that Regulation F allows.

47. Defendant misled Plaintiff about her rights under the FDCPA.

48. Defendant frustrated Plaintiff's ability to intelligently choose a response to the letter.

49. The stated purpose of the FDCPA is to "eliminate abusive debt collection practices by debt collectors, to insure that those debt collectors who refrain from using abusive practices are not competitively disadvantaged, and to promote consistent State action to protect consumers against debt collection abuses.

50. As described herein, Defendant engaged in abusive debt collection practices.

51. WAYPOINT knew or should have known that its actions violated the FDCPA.

52. Defendants could have taken the steps necessary to bring their actions within compliance with the law but neglected to do so and failed to adequately review its actions to ensure compliance with the law.

### **POLICIES AND PRACTICES COMPLAINED OF**

53. It is WAYPOINT's policy and practice to send written collection communications, in the form annexed hereto as **Exhibit A**, which violate the law, by *inter alia*:

- (a) Using false, deceptive or misleading representations or means in connection with the collection of a debt;
- (b) Using a false representation of the character, amount or legal status of any debt;
- (c) Using unfair or unconscionable means to collect or attempt to collect any debt;
- (d) Overshadowing and/or contradicting Plaintiff's rights under the FDCPA; and



(e) Failing to comply with provisions of Regulation F.

54. On information and belief, Defendants sent written communications in the form annexed hereto as **Exhibit A** to at least 50 natural persons in New Jersey within one year of this Complaint.

### **COUNT I**

#### **NEW JERSEY DECLARATORY JUDGMENT ACT**

55. Plaintiff, on behalf of herself and others similarly situated, repeats and realleges all prior allegations as if set forth at length herein.

56. As discussed herein, the Court has jurisdiction to declare the rights of Plaintiff and others similarly situated relative to the Defendant.

57. Plaintiff is a person interested under a written contract or other writing constituting a contract or whose rights, status or other legal relations are affected by a statute, contract, who may have determined any question of construction or validity arising under the instrument, statute, contract and obtain a declaration of rights, status or other legal relations thereunder.

58. Plaintiff and others similarly situated are entitled to Declaratory Judgment that Defendant violated the Plaintiff's rights and the FDCPA as alleged herein.

### **COUNT II**

#### **FAIR DEBT COLLECTION PRACTICES ACT, 15 U.S.C. § 1692 *et seq.* VIOLATIONS**

59. Plaintiff, on behalf of herself and others similarly situated, repeats and realleges all prior allegations as if set forth at length herein.

60. Collection letters and/or notices, such as those sent by Defendants, are to be evaluated by the objective standard of the hypothetical "least sophisticated consumer."

61. Defendant's letters would cause the least sophisticated consumer to be confused about his or her rights.

62. Defendants' representations violated various provisions of the FDCPA including but not limited to: 15 U.S.C. § 1692e; §1692e(2)(A); § 1692e(10); and § 1692f.

63. Defendants violated 15 U.S.C. § 1692e of the FDCPA by using any false, deceptive or misleading representation or means in connection with their attempts to collect debts from Plaintiff and others similarly situated.

64. Defendants violated 15 U.S.C. § 1692e of the FDCPA in connection with their communications to Plaintiff and others similarly situated.

65. Because Defendant omitted information from its February 22, 2023 letter as described herein, it used false, deceptive, and misleading means in connection with the collection of the debt.

66. By failing to comply with Regulation F as described herein, Defendants violated 15 U.S.C. § 1692e of the FDCPA.

67. Defendant's false, misleading and deceptive statement(s) is material to the least sophisticated consumer.

68. As described herein, Defendants violated 15 U.S.C. § 1692e(2)(A).

69. As described herein, Defendants violated 15 U.S.C. § 1692e(10).

70. As described herein, Defendants violated 15 U.S.C. § 1692f.

71. Defendant violated 15 U.S.C. § 1692g(a)(1) by failing to effectively convey the amount of the debt.

72. Defendant violated 15 U.S.C. § 1692g(a)(1) by providing the amount of the debt in a confusing manner.

73. As described herein, Defendant violated provisions of Regulation F.

74. Congress enacted the FDCPA in part to eliminate abusive debt collection practices by debt collectors.

75. Plaintiff and others similarly situated have a right to free from abusive debt collection practices by debt collectors.

76. Plaintiff and others similarly situated have a right to receive proper notices mandated by the FDCPA and Regulation F.

**WHEREFORE**, Plaintiff demands judgment against Defendants as follows:

(a) Declaring that this action is properly maintainable as a Class Action and certifying Plaintiff as Class representative and her attorneys as Class Counsel pursuant to R.4:32;

(b) Awarding Plaintiff and the Class statutory damages;

(c) Awarding attorneys' fees and costs;

(d) Awarding post-judgment interest.

(e) Awarding Plaintiff and the Class such other and further relief as the Court may deem just and proper.

**DEMAND FOR TRIAL BY JURY**

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

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to Rule 4:25-4, Joseph K. Jones, Esq., is designated as trial counsel for Plaintiff.

**RULE 4:5-1 CERTIFICATION**

Pursuant to R. 4:5-1, I hereby certify to the best of my knowledge, information, and belief at this time, that the matter in controversy is not the subject matter of any other action pending in any other court, and that no parties other than those listed herein should be joined in this matter.

Dated: July 25, 2023

*s/ Joseph K. Jones*

Joseph K. Jones, Esq. (002182006)

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Attorneys for Plaintiff

# EXHIBIT

A

Waypoint Resource Group  
1065 Levoy Dr  
Salt Lake City, UT 84123



Hours: Monday - Friday 7:00 AM - 5:00 PM CT  
(800) 241-3027  
my.waypoint.com

February 22, 2023

NIKIESHA SMITH

For:  
Reference #:  
Acct #:

**How you can dispute this debt?**

- Call or write us by April 03, 2023, to dispute all or part of the debt. If you do not, we will assume that our information is correct.
- If you write us by April 03, 2023, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. You may use the form below or write to us without the form. You may also include supporting documents.

Waypoint Resource Group LLC is a debt collector. We are trying to collect a debt that you owe to Comcast Communications. We will use any information you give us to help collect the debt.

**Our information shows:**

You have a debt from Comcast Communications with account number [REDACTED]

As of February 11, 2022 you owed:	\$1,504.31
Between February 11, 2022 and today:	
You were charged this amount in interest:	+ \$0.00
You were charged this amount in fees:	+ \$490.00
You paid or were credited this amount toward the debt:	- \$0.00
<b>Total amount of the debt now:</b>	<b>\$1,994.31</b>

**What else can you do?**

- Write to ask for the name and address of the original creditor, if different from the current creditor. If you write by April 03, 2023, we must stop collection until we send you that information. You may use the form below or write to us without the form.
- Go to [www.cfpb.gov/debt-collection](http://www.cfpb.gov/debt-collection) to learn more about your rights under federal law. For instance, you have the right to stop or limit how we contact you.
- Contact us about your payment options.

**NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION**

**How do you want to respond?**

Check all that apply:

I want to dispute the debt because I think:

- This is not my debt
- The amount is wrong
- Other (Please describe on reverse or attach additional information).

I want you to send me the name and address of the original creditor.

I enclosed this amount: \$ [REDACTED]

Make your check payable to  
Waypoint Resource Group LLC  
and include the reference number 230511522.

NIKIESHA SMITH  
12 WOODMILL DR  
CLEMENTON NJ 08021-5006

Mail this form to:

WAYPOINT RESOURCE GROUP LLC  
PO BOX 1081  
SAN ANTONIO TX 78294-1081

