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provided voice verifications of certain collection authorizations as further evidence that the collections being made were the collection of legitimate debt.

**PLAINTIFF**

5. Admitted.
6. Admitted.

**DEFENDANTS**

7. Admitted.

**The Telemarketers' False Representations**

- 15. Without knowledge, therefore denied.
- 16. Without knowledge, therefore denied.
- 17. Without knowledge, therefore denied.
- 18. Without knowledge, therefore denied.
- 19. Without knowledge, therefore denied.
- 20. Without knowledge, therefore denied.
- 21. Without knowledge, therefore denied.

**Defendants' Collection of Consumers' Fraudulently Induced Payments**

- 22. Without knowledge, therefore denied.
- 23. Without knowledge, therefore denied.
- 24. Denied as to Defendants' participation. Without knowledge, therefore denied as to the remainder of the allegations.

- 25. Admitted.
- 26. Without knowledge, therefore denied.
- 27. Without knowledge, therefore denied.
- 28. Without knowledge, therefore denied.
- 29. Without knowledge, therefore denied.
- 30. Without knowledge, therefore denied.
- 31. Without knowledge, therefore denied.
- 32. Admitted in part, denied in part.
- 33. Admitted in part, without knowledge therefore denied in part. Admitted that some

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- 34. Denied.
- 35. Denied.
- 36. Denied.
- 37. Denied.
- 38. Without knowledge, therefore denied.
- 39. Denied.

**Defendants' Monetary Transfers to Telemarketers**

- 40. Denied.
- 41. Admitted.
- 42. Denied.
- 43. Denied.
- 44. Without knowledge, therefore denied.
- 45. Denied.
- 46. Denied.
- 47. Denied. Defendants were actively misled.

**VIOLATIONS OF THE FTC ACT**

- 48. Admitted.
- 49. Admitted as to the language in the referenced statute.

**COUNT I**

**Unfair Collection of Consumers' Funds**

- 50. Denied.
  - i. Without knowledge, therefore denied.
  - ii. Denied.

51. Denied.

52. Denied.

**VIOLATIONS OF THE TELEMARKETING SALES RULE**

53. Admitted as to the content of the referenced statute.

54. Denied.

55. Admitted as to the content of the referenced regulation.

56. Admitted as to the content of the referenced regulation.

57. Admitted as to the content of the referenced statute.

58. Admitted as to the content of the referenced statute.

**COUNT II**

**Assisting and Facilitating TSR Violations**

59. Admitted in part, denied in part. Denied that Defendants provided substantial assistance.

a. Denied.

b. Denied.

**CONSUMER INJURY**

60. Denied.

**THIS COURT'S POWER TO GRANT RELIEF**

61. Admitted as to the content of the referenced statute.

62. Admitted as to the content of the referenced statute.

**PRAYER FOR RELIEF**

**WHEREFORE**, Defendant Treuhaft respectfully requests that Judgment be entered in favor of Treuhaft and against Plaintiff, and for any other relief in law or equity as justice may require.

Respectfully submitted,

*/s/ Todd Foster*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 1, 2017, I filed the foregoing electronically  
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*/s/ Todd Foster*

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