

***Laura Keeling vs. Collection Professionals, Inc., Robert B. Steele, and
Aplington, Kaufman, McClintock, Steele & Barry, Ltd.***

**United States District Court for the Northern District of Illinois,
Case No. 22-cv-04948**

NOTICE OF CLASS ACTION LAWSUIT AND PROPOSED SETTLEMENT

A FEDERAL COURT AUTHORIZED THIS NOTICE.
THIS IS NOT A SOLICITATION FROM A LAWYER AND YOU ARE NOT BEING SUED.

YOU MAY BE ENTITLED TO RECEIVE MONETARY COMPENSATION.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT

DO NOTHING AND STAY IN THE CLASS TO RECEIVE A PAYMENT	By doing nothing, you will be bound by the terms of the settlement and any order the Court issues and you will be entitled to receive a settlement check if the Settlement has been approved and after any appeals are resolved. By doing nothing and receiving the check, you give up your legal right to bring an individual lawsuit against Defendant for claims covered by this Settlement or that could have been covered by this Settlement. To learn more about your rights, see below.
EXCLUDE YOURSELF	You will receive no benefits, but you will retain your legal claims against the Defendants, subject to the time remaining in the applicable statute of limitations, which in an FDCPA case is 1 year from the date of the violation. To learn more about how to exclude yourself, see below.
OBJECT	Write to the Court explaining why you don't like the settlement. You may also appear at the fairness hearing. To learn more about how to object, see below.
GO TO A HEARING	Ask to speak in Court about the fairness of the settlement. To learn more about attending the fairness hearing, see below.

What is this?	This is a notice of a proposed settlement in a class action lawsuit.
What is this lawsuit about?	The settlement would resolve the class action lawsuit <i>Laura Keeling vs. Collection Professionals, Inc., Robert B. Steele, and Aplington, Kaufman, McClintock, Steele & Barry, Ltd.</i>, 22-cv-04948, N.D. Ill., brought on behalf of individuals with Illinois addresses, alleging that Defendants violated the Fair Debt Collection Practices Act, (“FDCPA”), 15 U.S.C. § 1692 <i>et. seq.</i> when, between September 13, 2021 and September 13, 2022, they failed to mail a “Notice of Debt” to Plaintiff and members of the Class within 5 days of their initial communication with Plaintiff and the Class regarding a debt they were alleged to owe, which failure allegedly violates the Fair Debt Collection Practices Act, 15 U.S.C § 1692g, (“FDCPA”). A “Notice of Debt” refers to a written communication from a debt collector informing a consumer about an outstanding debt. This notice must include specific information to comply with the FDCPA, such as: • Amount of the Debt: The total amount owed. • Creditor Information: The name of the creditor to whom the debt is owed. • Consumer Rights: A statement informing the consumer of their rights, including the right to dispute the debt. • Timeframe for Disputing: Information on how long the consumer has to dispute the debt. The Court has not ruled on the merits of the Plaintiff’s claims or the Defendants’ defenses. Defendants deny all wrongdoing and any liability but have decided to settle this lawsuit to avoid the expense, burden, and uncertainty of further litigation.
Why am I getting this notice?	You were identified as someone who failed to receive a Notice of Debt from Defendant(s) between September 13, 2021, and September 13, 2022, in connection with Defendants’ collection of a debt from you and in which a lawsuit was filed against you in Bureau County, Illinois.
What does the Settlement provide?	Defendants have agreed to pay a total of \$26,875.00 to be divided pro rata amongst each class member who does not ‘opt-out’ of the settlement. The amount of each individual payment will depend on how many members are in the Settlement Class and how many choose to opt-out of the Settlement. Defendants have also agreed to pay: \$5,000.00 as an incentive award and an additional \$5,000.00 in damages to the Plaintiff who brought this Class Action, Laura Keeling; \$63,125.00 to Class Counsel for attorney’s fees and costs; and also full payment of the fee to a Class Administrator for the costs of administering this Settlement.
How much money will I receive if I don’t opt-out?	If you do not timely exclude yourself from the settlement you will be entitled to receive an estimated payment of approximately \$125, subject to final approval by the Court. Your share of the Settlement Fund will depend on the total number of Settlement Class members who choose not to opt-out of the Settlement. Excluded from the Class are (1) unknown trustees, (2) unknown heirs of deceased individuals, and (3) corporate entities including corporations, limited liability corporations, limited partnerships and associations. There are approximately 215 potential Class Members including the named Plaintiff.
If I exclude myself, do I still receive benefits from this Settlement?	No, you will not receive anything resulting from the settlement, but you may have the right to sue, or be part of a different lawsuit against Defendant(s) over the FDCPA claims raised in the Litigation.

How can I receive a payment from the Settlement?	This is an ‘opt-out’ Settlement. If the Settlement has been approved and after any appeals are resolved, you will receive a check in the mail automatically unless you ‘opt-out’ of the Settlement by the deadline listed below.		
Am I giving up any legal rights if I don’t opt-out of the Settlement?	Yes. If you do nothing after the Settlement has been approved and after any appeals are resolved, you will receive a check in the mail and be bound by the terms of the Settlement. This means all of the Court’s order will apply to you, and you agree to give Defendants a “release.” A release means you will no longer be able to sue Defendants or be a part of any other lawsuit against Defendants about the claims or issues that were raised by the Plaintiff under the FDCPA or FDCPA state equivalents in this case, including the claims that were covered or could have been covered in this lawsuit filed by Plaintiff Laura Keeling. This description is general and does not cover the full release language. For a complete statement of all the contentions, proceedings and settlement terms in this case, you should visit the website at www.CollectionFDCPALawsuit.com.		
Do I have to be included in the Settlement?	No. If you do not want to receive monetary compensation from this Settlement and you want to keep the right to sue or continue to sue Defendant on your own, you must exclude yourself (opt-out) from the Settlement by sending a letter requesting exclusion to the Class Administrator postmarked or electronically submitted no later than November 23, 2026 at: Keeling v. Collection Professionals, Inc. c/o Analytics Consulting LLC PO Box 2002 Chanhassen, MN 55317-2002 Email: CollectionFDCPALawsuit@noticeadministrator.com Fax: 952-404-5750 A request for exclusion must be in writing, and include your full name, address, phone number and signature.		
If I don’t like something about the Settlement, how do I tell the Court?	If you are a class member and you don’t exclude yourself from the Settlement, you can file a written objection or comment on any part of the Settlement. You also have the right to be represented by your own counsel at your own cost in this Class Action. You must file your written objection with the Court by November 23, 2026. In order for an objection to be considered by the Court, it must: (a) provide the case name; (b) list the objector’s name, address and telephone number; (c) state the objection to the settlement; (d) set forth the legal and factual basis for the objection; and (e) provide copies of any documents in support of the objection. If you file an objection, you may appear at the fairness hearing. A copy of the objection must also be served on Class Counsel and Defendants’ Counsel. This can be done by mailing a copy to the below addresses, or served electronically via the Case Management/Electronic Case Files (CM/ECF) system used by the Court. <table border="0" style="width: 100%;"> <tr> <td style="vertical-align: top; width: 50%;"> Class Counsel: Mario Kris Kasalo The Law Office of M. Kris Kasalo, Ltd. 4950 Madison St., P.O. Box 1425 Skokie, IL 60077 mario.kasalo@kasalolaw.com </td><td style="vertical-align: top; width: 50%;"> Defendants’ Counsel: Justin M. Penn Hinshaw & Culbertson LLP 151 N. Franklin Street, Suite 2500 Chicago, IL 60606 </td></tr> </table> The objection must be postmarked to both Class Counsel and Defendants’ Counsel or filed using the CM/ECF system in the above-captioned case no later than November 23, 2026.	Class Counsel: Mario Kris Kasalo The Law Office of M. Kris Kasalo, Ltd. 4950 Madison St., P.O. Box 1425 Skokie, IL 60077 mario.kasalo@kasalolaw.com	Defendants’ Counsel: Justin M. Penn Hinshaw & Culbertson LLP 151 N. Franklin Street, Suite 2500 Chicago, IL 60606
Class Counsel: Mario Kris Kasalo The Law Office of M. Kris Kasalo, Ltd. 4950 Madison St., P.O. Box 1425 Skokie, IL 60077 mario.kasalo@kasalolaw.com	Defendants’ Counsel: Justin M. Penn Hinshaw & Culbertson LLP 151 N. Franklin Street, Suite 2500 Chicago, IL 60606		

Can I make an Oral Objection or Comment on the Settlement?	Yes. A Fairness Hearing will be held before the Honorable Franklin U. Valderrama of the United States District Court for the Northern District of Illinois, on January 13, 2027 at 9:30 a.m., in Courtroom 1941 of the United States District Court, 219 S. Dearborn Street, Chicago, Illinois, 60604. This hearing will be held to determine if the proposed settlement is fair, reasonable, and adequate and should be approved and the lawsuit dismissed. If you wish to attend the Hearing and make an objection or comment, you must file a document in advance. If the proposed Settlement is approved, it will be binding and will release Defendant from any and all claims that were asserted or could have been asserted in this lawsuit. YOU ARE <u>NOT</u> REQUIRED TO ATTEND THIS HEARING TO BENEFIT FROM THIS SETTLEMENT. The hearing may be postponed to a later date without notice.
What if I do Nothing?	If you do nothing and the Settlement has been approved and after any appeals are resolved, you will receive a check in the mail and be bound by the terms of the Settlement. This means all of the Court's order will apply to you, and you agree to give Defendants a "release." A release means you will no longer be able to sue Defendants or be a part of any other lawsuit against Defendants about the claims or issues that were raised by the Plaintiff under the FDCPA or FDCPA state equivalents in this case, including the claims that were covered or could have covered in this lawsuit filed by Plaintiff Laura Keeling. This description is general and does not cover the full release language. For a complete statement of all the contentions, proceedings and settlement terms in this case, you should visit the website at www.CollectionFDCPALawsuit.com.
Who is representing the Plaintiff and the Class?	The Court has appointed Mario Kasalo of The Law Office of M. Kris Kasalo, Ltd. as Class Counsel to represent you and the other persons in the Settlement Class. You will not be personally charged by these lawyers. They will be paid by the Defendants in an amount to be determined and approved by the Court. The amount of attorney's fees paid does not reduce or otherwise affect what Settlement Class Members recover.
What if I have more questions or want to get more information about the Settlement?	This notice contains limited information about the settlement. For more information, to view additional settlement documents, and to review information regarding your opt-out and objection rights and the final approval hearing, please contact the Class Administrator at: Keeling v. Collection Professionals, Inc. c/o Analytics Consulting LLC PO Box 2002 Chanhassen, MN 55317-2002 Email: CollectionFDCPALawsuit@noticeadministrator.com Phone: 844-955-2820 or visit the website at www.CollectionFDCPALawsuit.com. Class Counsel may be contacted at: Mario Kris Kasalo The Law Office of M. Kris Kasalo, Ltd. 4950 Madison St., P.O. Box 1425 Skokie, IL 60077 Tel: 312-726-6160 Fax: 312-698-5054 Email: mario.kasalo@kasalolaw.com Please do not call the Judge or Court Clerk.