

**AMY CONEY BARRETT SIDED
AGAINST CONSUMERS EVERY
THREE OUT OF FOUR CASES**

ACCOUNTABLE 

CONSUMERS: Amy Coney Barrett Sided Against Consumers In 78% Of Cases She Saw While Serving On The 7th Circuit.

Amy Coney Barrett Sided With Entities Accused Of Harming Consumers 78% Of The Time In Matters That Came Before Her Court.

Of the 32 Instances Where Consumers Brought Cases Against Entites Accused Of Mistreating Them, Amy Coney Barrett Sided With The Companies 78% Of The Time.

NOTE: Red in the chart below denotes a decision benefitting corporations. Blue denotes benefitting individuals. White is neutral.

OPINION DATE	CASE TITLE	CASE NUMBER	BARRETT'S VOTE	DESCRIPTION
1/29/18	Mehdi Abdollahzadeh v. Mandarich Law Group, LLP	18-1904	Barrett joined in the opinion affirming the District Court's ruling.	Mehdi Abdollahzadeh sued Mandarich Law Group for attempting to collect a time-barred debt in violation of the Fair Debt Collection Practice Act (FDCPA). The debt collector asked the judge to rule in their favor citing the "bona fide error" defense. The District Court ruled in favor of the debt collector, determining that the violations were unintentional.
2/6/18	Rojas v. X Motorsport Inc.	17-2250	Barrett joined the court in affirming the district court's judgment.	Edward Rojas claimed X Motorsport, a car dealership, violated the Truth in Lending Act by failing to state a sale was dependent upon a financier's approval. The district court ruled for X Motorsport, noting a second document mentioned the approved financing.
3/23/18	Chellappa v. Summerdale Court Condo Association	17-2740	Barrett joined the court in affirming the district court's dismissal.	Raja Chellappa sued Summerdale Court Condo Association due to refusing to hear noise complaints, and a complaint over a judge's denial of a delay request. The district court ruled for the defendants, but told Chellappa he could appeal.
5/8/18	Paula Casillas v. Madison Avenue Associates, Inc.	17-3162	Barrett wrote an opinion affirming the district court's decision for Madison Avenue Associates.	A woman filed a class action against a debt collector for not properly disclosing required materials under the Fair Debt Collection Practices Act (FDCPA). The District Court dismissed the claim due to lack of harm.
6/25/18	Davis v. Bank of Am. Corp.	17-3656	Barrett joined the court in affirming the district court's dismissal.	This case was a follow-up to a foreclosure case, ruled for the defendants; the plaintiffs refiled separately, with Davis (not a lawyer) claiming to be a spokesman. A district court dismissed the case for lack of argument.
7/5/18	Parker v. Capital One Auto Fin. Inc.	17-2123 & 17-3101	Barrett joined the court in affirming the district court's dismissal.	Brenda Parker called the police following a tow-truck repossession, then multiple entities for taking her car without due process, as well as a claim against her auto loan for violating consumer-protection statutes. The

				claims were dismissed; the auto loan claim received a summary judgment against Parker, with the 7th being asked to affirm.
8/29/18	Shameca S. Robertson (on behalf of class) v. Allied Solutions, LLC	17-3196	Barrett voted to reverse the judgment of the district court dismissing the claim for lack of jurisdiction, and remanded the case for further proceedings.	A woman sued on behalf of a potential class of victims alleging that Allied Solutions, Inc. violated the Fair Credit Reporting Act in the way they checked prospective employee's backgrounds. The District court dismissed the case for improper jurisdiction.
9/4/18	Sarah Steffek v. Client Services, Incorporated	19-1491	Barrett joined the opinion reversing the District Court's ruling that Client Services, Inc.'s notices satisfied FDCPA and were not obligated to disclose more information to debtors.	Steffek and Jill Vandenwyngaard received debt collection notices from Client Services Inc. that did not clearly identify the creditor currently holding their debt, in violation of the Fair Debt Collection Practices Act. The District Court ruled the notices sufficiently identified the current creditor.
9/10/18	Isaac Paz v. Portfolio Recovery Associates, LLC	17-3259	Barrett joined in the opinion affirming the District Court's ruling for the lower attorney award.	Isaac Paz engaged in a lengthy legal battle with Portfolio Recovery Associates, LLC over the course of several years, rejecting several opportunities to settle. Paz was ultimately awarded \$1000 at trial - and sought over \$180,000 in attorney's fees, but the District Court only rewarded ~\$10,000. Paz appealed that decision.
10/4/18	Momo Enterprises, LLC v. Popular Bank, et al.	17-3223	Barrett joined the court in affirming the district court's judgment.	The plaintiffs challenged the sales and foreclosures of a commercial condo in Chicago and their subsequent evictions, citing a range of law violations. A district court dismissed the claims.
11/8/18	Knopp v. Wells Fargo Bank N.A.	18-2752	Barrett joined the court in affirming the district court's denial.	Justin Knopp, following an affirmation of a decision for Wells Fargo on the merits, filed a motion claiming fraud on the part of Wells Fargo, specifically a 'forensic audit.' A district court denied the motion.
12/7/18	Hahn v. Bank of America	17-3563	Barrett joined the court in dismissing the appeal.	Eloise Hahn sued Bank of America for violation of the terms of a trust, identity theft, and pilfering tax returns. The court describes Hahn's allegations as "extremely difficult, if not impossible, to follow." The court ruled against Hahn, saying she failed to present an argument.
1/8/19	Humphrey v. Trans Union LLC	18-1584	Mixed. Barrett joined the court in affirming the CRA judgment and partially vacated the judgment for Navient, saying Humphrey presented sufficient evidence they disseminated inaccurate information.	Plaintiff sued Transunion and Navient for continuing to present inaccurate information on his credit reports. District court ruled in favor of CRA's and against Navient.
1/23/19	Deborah Walton v. EOS CCA	17-3040	Barrett wrote the opinion affirming the District Court's ruling.	A woman argued a debt collector violated the Fair Debt Collection Practices Act and the Fair Credit Reporting Act by failing to verify her debt (\$247 to AT&T) with the original creditor; case involved a misprint of an account number. A district court ruled for the agency (EOS CCA).

2/11/19	Walton v. BMO Harris Bank N.A. and Equifax	18-2877	Barrett joined the court in affirming the lower court's decision.	Deborah Walton sued BMO and Equifax under the Fair Credit Reporting Act, saying BMO gave inaccurate information to Equifax, which Equifax then reported. The district court sided with the defendants, saying Walton lacked evidence.
4/11/19	Peters v. Sloan	18-3554	Barrett joined the court in affirming the lower court's decision.	Elizabeth Peters sued defendants involved with the foreclosure of her Iowa home, citing a lack of proper information from Wells Fargo. On technical grounds involving jurisdiction, the district court dismissed her case.
4/11/19	Chancellor v. Select Portfolio Servicing	18-3037 & 18-3246	Barrett joined the court in affirming the lower court's decision.	This case concerned enforcement of an oral settlement between Terence Chancellor and his mortgage suppliers, following an oral settlement. The district court dismissed Chancellor's objection.
6/21/19	In re Francis	18-3523	Barrett joined the court in affirming the lower court's decision.	A district court denied a request to reopen a bankruptcy case following the closure of a mortgaged property.
6/24/19	Blanchette v. Navient Corp.	19-1312	Barrett joined the court decision affirming the lower court.	Jeremy Blanchette had a dismissed complaint against four federal student loan entities. The complaint was dismissed by a district court as the Higher Education Act of 1965 did not create a private right of action.
7/23/19	Kathryn G. Collier and Benjamin M. Seitz, et al. v. SP Plus Corporation	17-2431	Barrett joined in the opinion vacating the District Court's judgment and remanding.	The case was a class action suit alleging a parking company violated the Fair and Accurate Credit Transaction Act (FACTA).
7/26/19	Vanessa Mathews v. REV Recreation Group, Inc.	18-1982	REV Recreation Group, Inc. Barrett's wrote the opinion affirming the district court's ruling in favor of REV Recreation Group, Inc.	Vanessa and Randy Mathews purchased an RV, which came with a one-year warranty from the manufacturer, REV Recreation Group, Inc. The RV was riddled with problems from the time that they bought it, and these problems ultimately led the Mathews to sue REV.
8/2/19	Federal Trade Commission v. Credit Bureau Center LLC and Michael Brown	18-2847 & 18-3310	Barrett voted against hearing this case en banc, rejecting a chance to overturn the appellate decision.	A 7 th Circuit Court Of Appeals panel held that "held that the Federal Trade Commission (FTC) cannot seek restitution for victims of consumer fraud" by vacating a \$5 million judgment for consumers against a credit monitoring company.
1/10/20	Von Germeten v. Planet Home Lending	19-2459	Barrett joined the court in affirming the lower court's decision.	Plaintiff sued defendant in alleging violations of the Truth In Lending Act. District court ruled in favor of defendant and case was dismissed
2/19/20	Ali Gadelhak v. AT&T Services, Inc.	19-1738	Barrett wrote the opinion affirming the District Court's ruling for AT&T.	Gadelhak sued AT&T after receiving unwanted marketing text messages from the company. Under dispute was if the system AT&T used violates the Telephone Consumer Protection Act. The ruling was seen as " a big bite out of the TCPA. "
2/25/20	Dunn v. Wells Fargo Bank, N.A. (aka Hoipkemier v. Wells Fargo Bank)	20-1080	Barrett joined the court's decision.	The Seventh Circuit has struck down a challenge to a \$17.85 million deal resolving six proposed class actions accusing Wells Fargo of blasting consumers with autodialed calls in violation of the Telephone Consumer Protection Act, ruling that the objector hadn't adequately demonstrated he had received one of the disputed calls.

3/11/20	Mussat v. IQVIA, Inc.	19-1204	Barrett joined the court in siding with Florence Mussat, vacating and remanding the lower court's decision.	Physician Florence Mussat received two unsolicited faxes from IQVIA which did not include opt-out notices. Mussat filed a class-action claim against IQVIA, which was dismissed by a district court as Mussat lacked standing for non-Illinois recipients of the notices.
3/17/20	Zummo v. City of Chicago	18-3531	Barrett affirmed the district court ruling dismissing the case	A Chicago taxi medallion holder sued the City of Chicago for allowing rideshare services, which created more competition than anticipated when the medallion was purchased, thereby reducing the value of the medallion. The District court dismissed the case.
4/29/20	United States v. Kincaid	19-2654	Barrett joined the court in affirming the lower court's decision.	A district court ruled a criminal defendant fraudulently quitclaimed an interest in a property to Steven Collins, therefore entering a turnover order under the Federal Debt Collection Procedures Act. The man attempted to demonstrate that his version of the story was correct, but repeatedly requested continuances for over a year. The District Court eventually ruled against him.
4/30/20	Thomas Dennis v. Niagara Credit Solutions, Inc.	19-1654	Barrett joined the court in affirming the district court's judgment.	Thomas Dennis received a debt collection letter that listed both "original" and "current" creditors, which he alleged was in violation of the Fair Debt Collection Practices Act's requirement that notices clearly identify the entity to whom the debt is owed. The District Court ruled that the letter sufficiently identified the creditor.
7/2/20	Kasprzyk v. Axiom Fin. LLC	19-2402	Barrett joined the court in affirming the lower court's decision.	Augustyn Kasprzyk lost his home in an Illinois foreclosure, leading to a wide-ranging lawsuit against 22 lending institutions, citing fraud in the mortgage securitization industry. The district court dismissed the case for lack of jurisdiction.
7/7/20	Walton v. First Merchant's Bank	19-3370	Mixed. Barrett joined a decision that affirmed the district court's judgment in all but a claim for TCPA violations, which was remanded.	Deborah Walton had unsuccessfully gone through a bench trial against her bank, claiming violations due to robocalls and overdraft charges. Walton wanted a jury trial, but a district court ruled the bench trial was a contractual waiver of a right to jury trial.
8/21/20	Neal Preston v. Midland Credit Management	18-3119	Mixed. Barrett joined in the opinion affirming the marking was false and/or deceptive, and reversing the ruling that the marking did not violate the FDCPA.	Neal Preston initiated a class action after receiving an envelope from Midland with "Time Sensitive Document" on it. Preston claimed this was a violation of Fair Debt Collection Practices Act privacy provisions barring unnecessary envelope markings. A district court ruled for Preston, but did not affirm the marking was in violation of the FDCPA.

Methodology: Accountable.US reviewed all cases Amy Coney Barrett heard during her time on the U.S. Court of Appeals for the 7th Circuit and analyzed her position on any case in which someone was alleging mistreatment as a consumer. Once each relevant opinion was catalogued, Accountable.US calculated the percentage of cases in which Barrett ruled in favor of the entity accused of harming the consumer

Amy Coney Barrett Wrote The Seventh Circuit Opinion That Found Sending Unwanted Text Messages To Consumers Did Not Violate The Telephone Consumer Protection Act (TCPA) In Certain Instances – Industry Attorneys Said This Ruling Would Help Other Businesses Get Away With Text Spam.

Case at Issue: Ali Gadelhak v. AT&T Services, Inc. ([No. 19-1738](#))

In *Gadelhak V. AT&T*, The District Court Found That AT&T Had Not Violated The Telephone Consumer Protection Act [TCPA] When Sending Unwanted Texts To Its Customers As The TCPA Barred "Automatic Telephone Dialing Systems," While The Company Was Using A Database Of Customer Phone Numbers.

In *Gadelhak V. AT&T Services, Inc.*, The Plaintiff Sued AT&T Alleging It Had "Impermissibly Used An Automatic Telephone Dialing System To Text Him Without His Prior Express Consent." "In *Gadelhak*, the plaintiff asserted that the defendant impermissibly used an automatic telephone dialing system to text him without his prior express consent. The defendant had texted the plaintiff using a system that drew on a database containing the numbers of existing customers. The district court entered summary judgment for the defendant, ruling that the defendant's system did not constitute an ATDS under the TCPA." [National Law Review, [02/26/20](#)]

- The District Court Ruled In AT&T's Favor As The Dialing System "Did Not Constitute An [Automatic Telephone Dialing System] Under The [Telephone Consumer Protection Act]. [National Law Review, [02/26/20](#)]

Judge Amy Coney Barrett Wrote The Seventh Circuit Opinion Affirming The District Court's Decision That AT&T Had Not Violated The TCPA Because It Did Not "Generate Random Or Sequential Numbers."

February 19, 2020: Judge Amy Coney Barrett Wrote The Seventh Circuit Opinion Affirming The District Court's Ruling In *Gadelhak v. AT&T Services, Inc.* That AT&T's System For Dialing Numbers "Did Not Qualify As An 'Automatic Telephone Dialing System'" In Violation Of The Telephone Consumer Protection Act As It Did Not "Generate Random Or Sequential Numbers." "The district court held that AT&T's system did not qualify as an "automatic telephone dialing system" because it lacked the capacity to generate random or sequential numbers. Although we adopt a different interpretation of the statute, under our reading, too, the capacity to generate random or sequential numbers is necessary to the statutory definition. The district court's judgment is therefore AFFIRMED." [Ali Gadelhak v. AT&T Services, Inc., Case No. 19-1738, [02/19/20](#)]

Judge Barrett Wrote That Because AT&T's "'Customer Rules Feedback Tool'" Only Dialed Numbers "Stored In A Customer Database," As Opposed To Randomly Produced, The Company Did Not Violate The Telephone Consumer Protection Act When It Sent "Unwanted Automated Text Messages" To The Plaintiff. "The system at issue in this case, AT&T's 'Customer Rules Feedback Tool,' neither stores nor produces numbers using a random or sequential number generator; instead, it exclusively dials numbers stored in a customer database. Thus, it is not an 'automatic telephone dialing system' as defined by the Act—which means that AT&T did not violate the Act when it sent unwanted automated text messages to Ali Gadelhak." [Ali Gadelhak v. AT&T Services, Inc., Case No. 19-1738, [02/19/20](#)]

Industry Attorneys Believed The Seventh Circuit's Decision In *Gadelhak* Would Help Other Businesses Fight Lawsuits Alleging Violations Of The TCPA.

Attorneys for K&L Gates' TCPA Watch Believed The Seventh Circuit's Decision In *Gadelhak V. AT&T Services, Inc.* Would "Be Of Assistance To Businesses Operating Within The Seventh Circuit In Defending Against [Telephone Consumer Protection Act] Lawsuits." "The Seventh Circuit's decision that a system which places calls using an existing database of numbers does not qualify as an ATDS will be of assistance to businesses operating within the Seventh Circuit in defending against TCPA lawsuits. And the split between the Third, Seventh, and Eleventh Circuits, on the one hand, and the Ninth Circuit, on the other, may eventually spur the Supreme Court to provide its own interpretation of the definition of ATDS." [K&L Gates TCPA Watch, accessed [10/08/20](#)]

Amy Coney Barrett Voted Not To Reconsider A Seventh Circuit Case That Effectively Ended FTC Restitution To Harmed Consumers In Within The Circuit (Illinois, Indiana, And Wisconsin.)

Case at Issue: Federal Trade Commission v. Credit Bureau Center LLC and Michael Brown. ([Nos. 18-2847 & 18-3310](#))

The Federal Trade Commission (FTC) Sued Credit Bureau Center (CBC) Alleging The Company Fraudulently Enrolled Customers Into Costly Credit Monitoring Services It Initially Offered As "'Free' Credit Reports" – A Court Eventually Ordered CBC Permanently Stop The Practice And Pay \$5 Million In Restitution To Harmed Consumers.

In *FTC V. Credit Bureau Center (CBC)*, The Federal Trade Commission Alleged CBC Engaged In A Fraudulent Scheme In Which It Enrolled Customers Into A Credit Monitoring Service That Costs "Almost \$360 Per Year" After Offering "'Free' Credit Reports Via Online Websites." "The FTC sued Credit Bureau Center (CBC) because of a fraudulent scheme in which CBC offered consumers 'free' credit reports via online websites, but then automatically enrolled customers, without notice, in a credit monitoring service for \$29.94 per month – almost \$360 per year." [People for the American Way, [09/04/19](#)]

A Federal Judge Ordered That CBC Permanently Stop The Practice As Well As Pay "\$5 Million In Restitution To The FTC To Be Provided To Victims." "A federal judge entered an order permanently stopping the practice, and also required CBC to pay \$5 million in restitution to the FTC to be provided to victims, similar to orders in other FTC fraud cases." [People for the American Way, [09/04/19](#)]

After The Seventh Circuit Ruled That The FTC Did Not Have The Authority To Seek Restitution Despite Acknowledging That CBC Was "'Liable'" For The Fraud, Judge Amy Coney Barrett Voted Not To Reconsider The Prior Court Decision Barring FTC Restitution.

After CBC Appealed To The Seventh Circuit, The Court Found That Although CBC Was "Liable And Could Be Enjoined From Continuing The Fraud In The Future," The FTC Did Not Have The Authority To Seek Restitution And Vacated The \$5 Million Restitution Order. "CBC appealed to the Seventh Circuit. A three-judge panel including Brennan agreed that CBC was liable and could be enjoined from continuing the fraud in the future. But even though the 7th Circuit had upheld the FTC's ability to seek restitution 20 years ago, the court overruled its prior decision and held that the FTC cannot seek restitution for consumers and vacated the \$5 million restitution order." [People for the American Way, [09/04/19](#)]

The Court Believed That Implying The FTC Had The Authority To Seek Restitution Did Not "Sit Comfortably With The Text" Of The FTC Law," As A 1996 Supreme Court Decision Which Ruled That "Private Plaintiffs Could Not Seek Restitution When Enforcing A Federal Environmental Law" Had "Displaced" The Seventh Circuit's Prior Ruling Allowing Restitution. "The court stated that implying FTC authority to seek restitution does not 'sit comfortably with the text' of the FTC law, and that a Supreme Court decision in 1996, which ruled that private plaintiffs could not seek restitution when enforcing a federal environmental law, had 'displaced' the 7th Circuit's prior ruling upholding the FTC's authority to seek consumer restitution." [People for the American Way, [09/04/19](#)]

Judge Amy Coney Barrett Voted To Refuse The Reconsideration Of A Prior Court Decision That Found The "The Federal Trade Commission (FTC) Cannot Seek Restitution For Victims Of Consumer Fraud That Is Central To The Agency's Mission." "Trump 7th Circuit judges Amy Coney Barrett, Michael Brennan, Michael Scudder, and Amy St. Eve joined the 7th Circuit majority in refusing to reconsider a three-judge decision, in which Brennan participated, which overruled a prior decision and held that the Federal Trade Commission (FTC) cannot seek restitution for victims of consumer fraud that is central to the agency's mission." [People for the American Way, [09/04/19](#)]

Due To Amy Coney Barrett's Decision Not To Reconsider This Case, Harmed Consumers In The Seventh Circuit, Including Consumers In Illinois, Indiana, And Wisconsin, Can No Longer Expect FTC Restitution, An "Essential Remedy For Corporate Fraud."

Due To This Decision, Harmed Consumers In States Within The Seventh Circuit, Such As Illinois, Indiana, And Wisconsin, Will No Longer Be Able To Receive FTC Restitution, An "Essential Remedy For Corporate Fraud." "Fortunately, most federal appeals courts still permit the FTC to seek restitution for consumers in cases of fraud, at least for now. But for consumers in the Midwestern states of Illinois, Indiana, and Wisconsin who live in the 7th Circuit, this essential remedy for corporate fraud is no longer an option, due in large part to the Trump judges' votes." [People for the American Way, [09/04/19](#)]

Amy Coney Barrett Wrote An Opinion Affirming A District Court Decision Relating To Fair Debt Collection Practices Act (FDCPA) Disclosures That Dissenting Judges, Including One Appointed By A Republican President, Believed Would Make It More Difficult For Consumers To Fight Violations Of The FDCPA's Protections Against Abusive Debt Collection Practices.

Case at Issue: Paula Casillas v. Madison Avenue Associates, Inc. ([No. 17-3162](#))

Madison Avenue Associates, A Debt Collector, Was Sued By The Plaintiff Paula Casillas For Failing To Inform Her That "She Had To Communicate With The Company In Writing In Order To Trigger Her Rights Under The FDCPA," In And Of Itself A Violation Of The FDCPA.

Madison Avenue Associates Was Sued By Paula Casillas For Violating The Fair Debt Collection Practices Act (FDCPA) After It Sent A Letter To Her Attempting To Collect An Owed Debt But Failed To Inform Her That "She Had To Communicate With The Company In Writing In Order To Trigger Her Rights Under The FDCPA." "Madison Ave. Associates sent Paula Casillas a letter attempting to collect a debt she allegedly owed to a credit union. But the letter failed to state, as required by the FDCPA, that she had to communicate with the company in writing in order to trigger her rights under the FDCPA. These rights include, for example, the right to demand verification of the underlying debt and stop debt collection until the debt is

verified. Ms. Casillas thus filed suit against Madison, on behalf of herself and other consumers who had been similarly treated." [People for the American Way, [06/11/19](#)]

Judge Barrett Wrote The Opinion Affirming The District Court's Decision That The Plaintiff Did Not Have Standing As She Was Unable To "Show Specific Injury" While Adding That Madison Avenue Associates' Failure To Inform Her Of Her Rights Was Nothing More Than A "Bare Procedural' Error."

Judge Amy Coney Barrett Wrote The Opinion In Casillas V. Madison Ave. Associates Inc. Affirming The District Court's Decision That The Plaintiff "Did Not Have Standing To Enforce A Clear Violation Of The Federal Fair Debt Collection Practices Act (FDCPA)," Which "Directly Contradicted A Previous Ruling By Another Court Of Appeals." "Trump 7th Circuit judge Amy Coney Barrett wrote an opinion in Casillas v. Madison Ave. Associates Inc. ruling that Paula Casillas did not have standing to enforce a clear violation of the federal Fair Debt Collection Practices Act (FDCPA). Even though that decision directly contradicted a previous ruling by another federal court of appeals, the majority of the 7th Circuit, including the other three Trump appointees, refused to reconsider the decision." [People for the American Way, [06/11/19](#)]

The District Court And The Court Of Appeals Dismissed The Plaintiff's Suit Because She Was Unable To "Show Specific Injury," With Barrett Minimizing The Defendant's Failure To Properly State A Consumer's Rights Under The FDCPA As A "Bare Procedural' Error." "Both the district court and the court of appeals, however, dismissed her suit because they claimed she lacked standing since she did not show a specific injury. Barrett minimized Madison's omission as a 'bare procedural' error, and claimed that Casillas had not shown that Madison's violation of the Act 'presented an appreciable risk of harm to the underlying concrete interests Congress sought to protect.'" [People for the American Way, [06/11/19](#)]

Dissenting Judges, Including One Originally Appointed By A Republican President, Thought Barrett's Decision Would "'Make It Much More Difficult For Consumers' To Enforce The FDCPA's 'Protections Against Abusive Debt Collection Practices.'"

In Their Dissent, Judges Diane Wood, David Hamilton, And Ilana Rovner – A Judge Originally Appointed By Republican President George H.W. Bush – Thought Barrett's Decision Would "'Make It Much More Difficult For Consumers' To Enforce The FDCPA's 'Protections Against Abusive Debt Collection Practices.'" "But Chief Judge Diane Wood, joined by Judges David Hamilton and Ilana Rovner, who was appointed by President George H.W. Bush, strongly dissented. Barrett's decision, the dissent wrote, 'will make it much more difficult for consumers' to enforce the FDCPA's 'protections against abusive debt collection practices.' Failure to notify consumers that they must communicate in writing, the dissent went on, "is anything but a picky procedural gaffe" because a consumer's written complaint can require a collector to stop collection altogether until the debt is fully verified." [People for the American Way, [06/11/19](#)]