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## Joshua Dickinson and Kyle Klucas Provide Insight into 'Consumer Debt' and 'Misrepresentation' in Identity Theft Cases

Spencer Fane attorneys [Joshua C. Dickinson](#) and [Kyle Klucas](#) co-authored an article for *ACA International* on identity theft related to Fair Debt Collection Practices Act (FDCPA) cases.

Titled "Seventh Circuit Clarifies Standards for 'Consumer Debt' and 'Misrepresentation' in Identity Theft FDCPA Cases," the article discusses *Woods v. LVNV Funding* and how its Seventh Circuit Court of Appeals ruling might impact future identity theft cases.

"*Woods v. LVNV Funding* somewhat lowers the standard that plaintiffs must meet to prove that their debts are 'consumer debts,'" Josh and Kyle explain. "Plaintiffs must now only prove that the evidence permits a 'reasonable inference' that the debt was undertaken for consumer purposes."

To read the full article, please click [here](#).