

IN THE COUNTY COURT, IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO:

CITIZENS BANK, N.A.

Plaintiff,

vs.

LORI M WALTER

Defendant.

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**STATEMENT OF CLAIM**

Plaintiff, by and through its undersigned counsel, sues the Defendant LORI M WALTER and states the following:

1. Damages in this action do not exceed \$8,000.00.
2. Defendant resides or regularly conducts business in Broward County, Florida.
3. Plaintiff Citizens Bank, N.A. was formerly known as Citizens Bank of Rhode Island. All conditions precedent required to bring this action have occurred or have been performed.

**COUNT I - BREACH OF CONTRACT**

XXXXXXXXXX [REDACTED]

Plaintiff repeats and realleges each and every material allegation set forth in paragraphs 1 through 3 above and incorporates the same by reference.

4. Plaintiff extended an offer to enter into a contract with Defendant.
5. A true and correct copy of the contract applicable to this matter is attached hereto and incorporated herein by reference.
6. Defendant indicated acceptance of the terms of the contract attached hereto in a manner indicated by the terms of the contract or other manner recognized by law.
7. For tracking purposes, an account was opened bearing number XXXXXXXXXXXX [REDACTED] and said account was utilized to track payment made by or on behalf of Defendant.
8. Plaintiff fulfilled its obligations pursuant to the contract.
9. Defendant failed to timely pay Plaintiff for goods, services, or money for which Defendant received benefit.
10. By failing to make timely payment, Defendant breached the contract. The account was charged off on or about 01/25/22.