

Document Execution Coversheet

Date: September 8, 2017
Loan #: 0014643522
File #: 16-09317-FC

Document Type: Affidavit
Borrower: ANGELO SKOUBIS & MARIA SKOUBIS
Property Address: 5242 N VIRGINIA, CHICAGO, IL 60625

Please execute and return the attached document to:

Marinosci Law Group, P.C.
134 N. LaSalle St. Suite 1900
Chicago, IL 60602

Contact Information for questions:

Genaro Sanchez
312.940.8580

Judgment Hearing Scheduled: N/A.

Special Instructions:

PLEASE BE ADVISED THAT FIRM WILL NOT ADD ATTORNEY'S FEES AND COSTS TO THIS AOI AS THEY ARE INCLUDED IN A **SEPARATE ATTORNEYS' FEES/COSTS AFFIDAVIT. THIS INCLUDES BPO/BK FEES/UTILITIES.**

ILLINOIS JUDGES WILL NOT SIGN/APPROVE A JUDGMENT WITHOUT HAVING AN ESCROW BREAKDOWN THE BREAKDOWN **CANNOT BE REMOVED.**

IF YOU ARE SIGNING THIS AFFIDAVIT, YOU MUST **PERSONALLY** REVIEW THE INFORMATION CONTAINED IN THE AFFIDAVIT FOR ACCURACY AS WELL AS ANY ATTACHED DOCUMENTS. IF THE AFFIDAVIT REFERENCES DOCUMENTS AND YOU DO NOT HAVE THE DOCUMENTS, THEN DO NOT EXECUTE THE AFFIDAVIT AND CONTACT OUR OFFICE IMMEDIATELY TO DISCUSS.

PLEASE USE THE NOTARY SPACE PROVIDED WITHIN THE DOCUMENT AND **DO NOT USE STAND ALONE NOTARY PAGE.** IF NOTARY IS STAND ALONE THE COURT WILL DEEM THE AFFIDAVIT INSUFFICIENT.

STATE OF ILLINOIS
COUNTY OF COOK

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS,
- COUNTY DEPARTMENT - CHANCERY DIVISION -

CITIZENS BANK N.A. F/K/A RBS CITIZENS, N.A. F/K/A
CHARTER ONE BANK, N.A.

Plaintiff,
vs

ANGELO SKOUBIS, MARIA C SKOUBIS, BMO HARRIS
BANK NATIONAL ASSOCIATION F/K/A HARRIS BANK,
N.A., UNKNOWN OWNERS AND NON-RECORD
CLAIMANTS

Defendant(s).

Case No. 16 CH 11689

Cal No.: 56

Property Address:
5242 N VIRGINIA
CHICAGO, IL 60625

AFFIDAVIT OF AMOUNTS DUE AND OWING

I, Terrance Sanders, hereby deposes and affirms under oath:

I am employed as a foreclosure processor for Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A., Plaintiff. I have authority to make this affidavit because I am a person familiar with the business and its mode of operation. In the regular performance of my job functions at Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A., I am familiar with the business records maintained by Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A. for the purpose of servicing mortgage loans, collecting payments and pursuing any delinquencies. Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A., Servicing Records typically include electronic data compilations and imaged documents pertaining to the loans it services.

To the extent that the business records of the loan in this matter were created by a prior servicer, the prior servicer's records for the loan were integrated and boarded into Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A.'s, systems, such that the prior servicer's records concerning the Loan are now part of Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A.'s, business records. Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A., maintains quality control and verification procedures as part of the boarding process to ensure the accuracy of the boarded records. It is the regular business practice of Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A., to integrate the prior servicer's records into Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A.'s, business records, and to rely upon the accuracy of those boarded records in providing its loan servicing functions. These prior servicer records are integrated and relied upon by Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A., as part of Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A.'s, business records.

Based on my training and personal knowledge of the processes by which they are created and

maintained, Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A.'s, Servicing Records were made at or near the time by, or from information provided by, persons with knowledge of the activity and transactions reflected in such records, and are kept in the ordinary course of business activity regularly conducted by Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A... It is the regular practice of Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A.'s, mortgage servicing business to make and update its Servicing Records. If called to testify at the trial of this matter, I could competently testify as to the facts contained in this affidavit.

Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A. acquired the servicing rights from the Defendant's loan on N/A from _____. At the time of this transfer, the Defendant's loan had an unpaid principal balance of \$ _____.

The amount due is based on my review of the following records: MSP _____. A true and accurate copy of these records, which I used when making this calculation is attached to this affidavit.

Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A., uses MSP software to automatically record and track mortgage payments. This type of tracking and accounting program is recognized as standard in the industry. When a mortgage payment is received, the following procedure is used to process and apply the payment, and to create the records I reviewed: Each entry in the records is made contemporaneously with the corresponding event by Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A.'s, personnel with direct knowledge thereof, acting in the regular course of business and not in anticipation of litigation.

The record is made in the regular course of Citizens Bank, N.A. f/k/a RBS Citizens, N.A., f/k/a Charter One Bank, N.A.'s business. In the case at bar, the entries reflecting the Defendant's payments were made in accordance with the procedure detailed above, and these entries were made at or near the time the payment was received.

MSP software accurately records mortgage payments when properly operated. In the case at bar, MSP software was properly operated to accurately record the Defendant's mortgage payments.

Based on the foregoing, ANGELO SKOUBIS & MARIA C SKOUBIS failed to pay amounts due under the Note, and the amount due and owing as of 9-28-17, is:

- Principal \$142,640.71
- Interest \$14,960.00
- Escrow Advance \$13,066.21
 - Insurance \$1,665.91
 - Taxes \$11,400.30

• Late Charges	\$309.04
• Property Inspections	\$196.00
GROSS AMOUNT DUE	\$171,171.96
Less/Plus balance in	
reserve account	\$ _____
NET AMOUNT DUE	\$171,171.96

plus reasonable attorney's fees and costs.

The Servicing Records pertaining to Defendant's, ANGELO SKOUBIS & MARIA C SKOUBIS, account further reveal that there has been a default in the Defendant's Note and Mortgage, and that sufficient and certified moneys to cure the default have not been tendered, nor have there been any agreed extensions, modifications or agreements between the parties to delay this foreclosure action.

Under penalties as provided by law pursuant to §1-109 of the Code of Civil Procedure, I certify that the statements herein are true and correct.

Executed at 10321 TELEGRAPH RD
GLEN ALLEN, VA, on Sept. 11, 2017

Citizens Bank, N.A. f/k/a RBS Citizens, N.A., F/K/A
Charter One Bank, N.A.

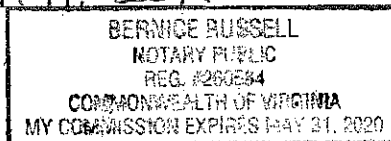
Signature: Terrance Sanders
Name: Terrance Sanders
Title: Foreclosure Processor

AFFIANT STATES NOTHING MORE

COMMONWEALTH
STATE OF VIRGINIA)
) SS:
COUNTY OF HANRICO)

Subscribed and Sworn to before me on Sept. 11, 2017

Bernice Russell
NOTARY PUBLIC



Prepared By:
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