

Assigned for all purposes to: Chatsworth Courthouse, Judicial Officer: Bernie LaForteza
1430647

GURSTEL LAW FIRM, P.C.
Gurstel Law Firm, P.C.'s California Debt Collection
License application is submitted and pending approval.
Kimberlee Tsai (SBN #227426)
Rachel Haney (SBN #308259)
Jason Burrows (SBN# 309882)
Amit Taneja (SBN# 304559)
Brianna Elmassian (SBN# 329673)
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Attorneys for Plaintiff,
Crown Asset Management, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA

LOS ANGELES COUNTY - CHATSWORTH COURT

Crown Asset Management, LLC
Plaintiff,

vs.

Juan Castro

Defendant.

Case No.

**COMPLAINT FOR MONEY DUE ON
ACCOUNT STATED; OPEN BOOK
ACCOUNT**

Crown Asset Management, LLC("Plaintiff") alleges causes of action against Juan Castro
("Defendant") as follows:

ALLEGATIONS COMMON TO ALL CAUSES OF ACTION

1. Plaintiff is a debt buyer.
2. Plaintiff believes that, on or about May 16, 2019, Citibank, N.A. provided Defendant with a credit account ("Account"), and granted use privileges on the same. Defendant used the Account to make purchases and/or take cash advances and/or make balance transfers, each

1 time reaffirming Defendant's agreement to repay Citibank, N.A. and its successors in
2 interest, for the amount of the purchase and/or cash advances and/or balance transfers.

3
4 3. Plaintiff is the sole owner of the debt at issue.

5 4. The debt balance at charge-off was \$10,926.33. \$0.00 in post charge-off fees and \$0.00
6 in post charge-off interest have been imposed since the time of charge-off.

7 5. The date of last payment on the Account was on November 25, 2019.

8 6. The charge-off creditor at the time of charge-off was Citibank, N.A. ("Charge-Off
9 Creditor"), whose address at said time was 5800 South Corporate Place, Sioux Falls, SD,
10 57108 . Charge-Off Creditor's account number associated with the debt is
11 *****6348.
12

13 7. Defendant's name and address as it appeared in the Charge-Off Creditor's records prior to
14 the sale of the Account to Plaintiff is JUAN CASTRO, 11024 BALBOA BLVD, # 665,
15 GRANADA HILLS, CA 91344-0000.
16

17 8. Prior to the commencement of this action, the Account was assigned or otherwise
18 transferred to Plaintiff. Plaintiff, is the present holder and sole owner of the Account.
19 Plaintiff's address is 3100 Breckinridge Blvd, Ste 725, Duluth, GA 30096. The names and
20 address of all persons or entities that purchased the debt after charge-off are:

21 (A) Crown Asset Management, LLC, 3100 Breckinridge Blvd, Ste 725
22 Duluth, GA 30096
23

24 9. Plaintiff has complied with the requirements of Civil Code section 1788.52. Notably,
25 section 1788.52(a)(7) requires that Plaintiff include its debt collector license number in any
26 written attempts to collect a consumer debt. The legislation that created this requirement
27
28

1 also stated that licenses would not be issued prior to January 1, 2022, and that a debt
2 collector that submits an application prior to January 1, 2022, may operate pending the
3 approval or denial of the application. On or before December 31, 2021, Plaintiff submitted
4 a debt collector license application, which is currently under consideration and has not
5 been denied or approved.
6

7 10. Attached hereto and incorporated herein by reference are true and correct copies of
8 documents evidencing the Account as stated in California Civil Code §1788.58(b).
9

10 (A) Exhibit 1 is a copy of the document demonstrating the assignment of the
11 Account to Plaintiff.

12 (B) Exhibit 2 is a copy of a statement provided to Defendant while the Account
13 was active, demonstrating that the debt was incurred by the Defendant.
14

15 (C) Exhibit 3 is a copy of the final billing statement.

16 11. Plaintiff believes that Defendant is an individual who currently resides within the
17 jurisdictional boundaries of this Court. Therefore, this Court is the proper Court for
18 adjudication of this matter.

19 12. Defendant failed to make payments as agreed on the Account and has failed to pay
20 amounts due on the Account.

21 13. Taking into account all known payments, charges, offsets, if any, the amount due on this
22 account as of the date this Complaint was prepared is \$10,926.33, which amount equals
23 the charge-off balance, less any payments or offsets as applicable.
24

25 14. Although demand has been made upon Defendant to pay the outstanding balance on the
26 Account, Defendant has failed to do so.
27
28

FIRST CAUSE OF ACTION
(Account Stated)

15. Plaintiff refers to and incorporates paragraphs 1 through 14.

16. Within the last four years, an account was stated in writing in which it was agreed that Defendant was indebted in the amount previously referenced herein.

17. Although demand has been made upon Defendant to pay said amount there remains an outstanding balance on the Account of \$10,926.33, which has not been paid, and is now due and owing from Defendant to Plaintiff, as successor in interest.

SECOND CAUSE OF ACTION
(Open Book Account)

18. Plaintiff refers to and incorporates paragraphs 1 through 17.

19. Within the last four years, Defendant became indebted in the amount previously referenced herein for a balance due on an open book account.

20. Although demand has been made upon Defendant to pay said amount there remains an outstanding balance on the Account of \$10,926.33, which has not been paid, and is now due and owing from Defendant to Plaintiff, as successor in interest.

///

///

///

1 WHEREFORE, as to all Causes of Action, Plaintiff prays for judgment against Defendant,
2 including but not limited to, the amounts as follows:

- 3 1. For damages of \$10,926.33;
4
5 2. For costs of suit incurred herein; and
6 3. For such further relief that the Court may deem just and proper.

7
8 Dated: March 1, 2022

GURSTEL LAW FIRM, P.C.

9 

10 Kimberlee Tsai

11 Rachel Haney

12 Jason Burrows

13 Amit Taneja

14 Brianna Elmassian

15 Tai Tran

16 Afsaneh Afzalnia

EXHIBIT 1

Contract ID: [REDACTED] 1420
Document ID: [REDACTED] 20C2
Document ID: [REDACTED] EMB1

BILL OF SALE AND ASSIGNMENT
Brands and Costco Early Out 90 Day Flow Lot 2

THIS BILL OF SALE AND ASSIGNMENT dated August 27, 2020, is by Citibank, N.A., a national banking association organized under the laws of the United States, located at 5800 South Corporate Place, Sioux Falls, SD 57108 (the "Bank") to Crown Asset Management, LLC, organized under the laws of the Georgia, with its headquarters/principal place of business at 3100 Breckinridge, Blvd, Suite 725, Duluth, GA 30096 ("Buyer").

For value received and subject to the terms and conditions of the Master Purchase and Sale Agreement dated April 14, 2020 and Addendum No. 2 dated August 24, 2020, between Buyer, Bank and Department Stores National Bank (the "Agreement"), the Bank does hereby transfer, sell, assign, convey, grant, bargain, set over and deliver to Buyer, and to Buyer's successors and assigns, the Accounts described in Exhibit 1 and the final electronic file.

Citibank, N.A.

By: [Signature]
(Signature)

Name: Steven Dasch

Title: Authorized Party

Crown Asset Management, LLC

By: [Signature]
(Signature)

Name: Brian K. Williams

Title: CEO & Manager

SALE_ID

FILE

Brands and Costco Early Out 90 Day Flow Lot 2.xlsx

ACCOUNT NUMBER

6348

SALE SEGMENT

BANK

PRODUCT DESCRIPTION

Citi Rewards+

SALE ID

U4EM

PRINCIPAL

10770.33

PRE CHARGE OFF INTEREST

0

POST CHARGE OFF INTEREST

0

POST CHARGE OFF FEES

0

CHARGE OFF BALANCE

10926.33

CURRENT BALANCE

10926.33

DEFAULT DATE

12/3/2019 0:00

CHARGE OFF DATE

6/4/2020 0:00

LAST PAYMENT DATE

11/25/2019 0:00

LAST PURCHASE AMOUNT

LAST BALANCE TRANSFER AMOUNT

LAST BALANCE TRANSFER DATE

LAST CASH ADVANCE DATE

TOTAL PAYMENTS POST CHARGE OFF

0

TOTAL CREDITS POST CHARGE OFF

0

CONSUMER FIRST AND MIDDLE NAME

JUAN

CONSUMER RESIDENCE ADDRESS 1

11024 BALBOA BLVD

CONSUMER RESIDENCE ADDRESS 2

665

CONSUMER STATE

CA

CONSUMER ZIP CODE

913440000

CONSUMER RESIDENCE PHONE

BAD NUMBER INDICATOR

N

CONSUMER BIRTH DATE

AWARENESS INDICATOR

ATTORNEY LAW FIRM

ATTORNEY NAME

ATTORNEY ADDRESS

ATTORNEY CITY

ATTORNEY ZIP CODE

BANKRUPTCY CHAPTER

BK PROOF OF CLAIM PRINCIPAL

BK PROOF OF CLAIM INTEREST

BANKRUPTCY CASE NUMBER

BANKRUPTCY TRUSTEE

CO-BORROWER LAST NAME

CO-BORROWER SSN OR SIN

PRIOR ACCOUNT NUMBER 2

PRIOR ACCOUNT NUMBER 3

PRIOR ACCOUNT NUMBER 5

LENDING LEVEL 1
BANK

pri_acctno

6348

PRODUCT IDENTIFIER CODE

408

SALE AMOUNT

10926.33

PRE CHARGE OFF FEES

156

ORIGINAL LOAN BALANCE

ACCOUNT OPEN DATE

5/16/2019 0:00

LAST PAYMENT AMOUNT

25

LAST PURCHASE DATE

12/6/2019 0:00

LAST CASH ADVANCE AMOUNT

TOTAL NSF POST CHARGE OFF

0

CONSUMER LAST NAME

CASTRO

CONSUMER RESIDENCE CITY

GRANADA HILLS

CONSUMER RESIDENCE COUNTRY

CONSUMER SSN OR SIN

LANGUAGE INDICATOR

01

ATTORNEY PHONE

ATTORNEY STATE

BANKRUPTCY FILE DATE

BK PROOF OF CLAIM FEE

CO-BORROWER FIRST AND MIDDLE NAME

PRIOR ACCOUNT NUMBER 1

████████████████████

PRIOR ACCOUNT NUMBER 4

████████████████████

LENDING LEVEL 2
BANK

EXHIBIT 2

JUAN CASTRO

Member Since 2019 Account number ending in: 6348

Billing Period: 11/07/19-12/05/19

www.citicards.com

Customer Service 1-800-THANKYOU(1-800-842-6596)

TTY-hearing-impaired services only 1-877-693-0218

BOX 6500 SIOUX FALLS, SD 57117

DECEMBER STATEMENT

Minimum payment due: **\$193.05**
 New balance as of 12/05/19: **\$10,508.05**
 Payment due date: **01/02/20**

See the last page of this statement for important information about how to avoid paying interest on purchases.

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$39 and your APRs may be increased up to the Penalty APR of 29.99%.

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

| If you make no additional charges using this card and each month you pay... | You will pay off the balance shown on this statement in about... | And you will end up paying an estimated total of... |
|---|--|---|
| Only the minimum payment | 25 year(s) | \$25,302 |
| \$350 | 3 year(s) | \$12,600 (Savings=\$12,702) |

For information about credit counseling services, call 1-877-337-8188.

Your account is past due. Please pay at least the minimum payment due, which includes a past due amount of \$27.00 and an overlimit amount of \$8.05.

Account Summary

| | |
|------------------|-------------|
| Previous balance | \$3,459.77 |
| Payments | -\$25.00 |
| Credits | -\$0.00 |
| Purchases | +\$7,034.28 |
| Cash advances | +\$0.00 |
| Fees | +\$39.00 |
| Interest | +\$0.00 |

New balance **\$10,508.05**

Credit Limit

Revolving Credit limit **\$10,500**
 Includes \$3,200 cash advance limit

thankyou
from citi



Total ThankYou Member Available Point Balance: **23,890**
 as of 11/30/19

» See page 3 for more information about your rewards.

Pay your bill from virtually anywhere with the Citi Mobile® App and Citi® Online



To download:
 Text 'App15' to MyCiti (692484)
 or go to your device's app store.
 Or visit www.citicards.com

Minimum payment due **\$193.05**
New balance **\$10,508.05**
Payment due date **01/02/20**

Amount enclosed:

Account number ending in 6348

000000 PW 00 A 0

JUAN CASTRO
 11024 BALBOA BLVD
 # 665
 GRANADA HILLS CA 91344-5007

CITI CARDS
 PO BOX 78045
 Phoenix, AZ 85062-8045

JUAN CASTRO

Account Summary

| Trans. date | Post date | Description | Amount |
|----------------|--------------|-------------|--------|
|----------------|--------------|-------------|--------|

Payments, Credits and Adjustments

| | | | |
|-------|--|---------------------------|----------|
| 11/25 | | ONLINE PAYMENT, THANK YOU | -\$25.00 |
|-------|--|---------------------------|----------|

Standard Purchases

| | | | |
|-------|-------|---|------------|
| 11/18 | 11/18 | QUADPAY* BUSCEMI 8337823729 NY | \$294.28 |
| 11/20 | 11/20 | QUALITY KITCHEN & CABI GRANADA HILLS CA | \$6,350.00 |
| 12/04 | 12/04 | SQ *SQ *E LIG gosq.com CA | \$390.00 |

Fees charged

| Date | Description | Amount |
|-------|---------------------------------|---------|
| 12/05 | LATE FEE - NOV PAYMENT PAST DUE | \$39.00 |

Total fees charged in this billing period**\$39.00****Interest charged****Total interest charged in this billing period****\$0.00****2019 totals year-to-date****Total fees charged in 2019** **\$67.00****Total interest charged in 2019** **\$0.00****Interest charge calculation**Days in billing cycle: **29**

Your Annual Percentage Rate (APR) is the annual interest rate on your account.

| Balance type | Annual percentage rate (APR) | Balance subject to interest rate | Interest charge |
|--------------------------------------|------------------------------|----------------------------------|-----------------|
| PURCHASES | | | |
| Standard Purch | 0.00% | \$7,163.29 (D) | \$0.00 |
| (Introductory Rate Expires 08/30/20) | | | |
| ADVANCES | | | |
| Standard Adv | 26.74% (V) | \$0.00 (D) | \$0.00 |

Your Annual Percentage Rate (APR) is the annual interest rate on your account. APRs followed by (V) may vary. Balances followed by (D) are determined by the daily balance method (including current transactions).

Account messages

Only accounts that are open and current may earn and redeem ThankYou Points. If your account is past due, some ThankYou Points may be unavailable for redemption. Unavailable points may be reinstated, once you become current with your payments. A reinstatement fee may be charged. To view your scheduled payments and payment history, sign on to Account Online using the URL on the back of your card. To view available ThankYou Points, visit www.ThankYou.com

Remember, any charges above your revolving credit limit MUST BE PAID IN FULL by your statement's payment due date.

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thankyou
from citi**Member ID: 8910231678793699****ThankYou Points Earned This Period****2x on Supermarkets and Gas Stations¹** **0****1x on Other Purchases** **7,034****Round Up²** **26****10% Points Back³** **0****0 Points Redeemed This Period****Total Earned This Period** **7,060**

» Visit thankyou.com to redeem points or see full rewards details.

¹2X for the first \$6,000 in purchases per year and then 1 point per \$1 spent thereafter.

²Every purchase gets rounded up to the nearest 10 points. Points earned due to rounding will sometimes appear in the purchase categories (e.g., the 2X Supermarket or 1X Other Purchases categories) and not in the Round Up category.

³For up to 100,000 points redeemed per year.

Bonus points earned from promotional offers may take one to two billing cycles to appear on your statement. Please refer to the specific terms and conditions pertaining to the promotion for further details.

EXHIBIT 3

JUAN CASTRO

Member Since 2019 Account number ending in: 6348

Billing Period: 05/07/20-06/04/20

www.citicards.com**Customer Service 1-800-846-8444**

TTY-hearing-impaired services only 1-877-693-0218

BOX 6500 SIOUX FALLS, SD 57117

JUNE STATEMENT

| | |
|-----------------------------|-------------|
| Minimum payment due: | \$10,926.33 |
| New balance as of 06/04/20: | \$10,926.33 |
| Payment due date: | 06/04/20 |

See the last page of this statement for important information about how to avoid paying interest on purchases.

Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$39 and your APRs may be increased up to the Penalty APR of 29.99%.

Minimum Payment Warning: If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

| If you make no additional charges using this card and each month you pay... | You will pay off the balance shown on this statement in about... | And you will end up paying an estimated total of... |
|---|--|---|
| Only the minimum payment | 1 month(s) | \$10,926 |

For information about credit counseling services, call 1-877-337-8188.

Account Summary

| | |
|------------------|-------------|
| Previous balance | \$10,926.33 |
| Payments | -\$0.00 |
| Credits | -\$0.00 |
| Purchases | +\$0.00 |
| Cash advances | +\$0.00 |
| Fees | +\$0.00 |
| Interest | +\$0.00 |

New balance \$10,926.33**Credit Limit**

Revolving Credit limit \$10,500

Includes \$3,200 cash advance limit

Pay online www.citicards.com

Pay by phone 1-800-846-8444



Pay by mail Use this coupon

- Enclose a valid check or money order payable to CITI CARDS. No cash or foreign currency.
- Write the last four digits of your account number on your check.

Minimum payment due \$10,926.33**New balance \$10,926.33****Payment due date 06/04/20****Amount enclosed:**

Account number ending in 6348

000000 PW 34 A 0

JUAN CASTRO
11024 BALBOA BLVD
665
GRANADA HILLS CA 91344

CITI CARDS
PO BOX 78045
Phoenix, AZ 85062-8045

JUAN CASTRO

Account Summary

| Trans. date | Post date | Description | Amount |
|----------------|--------------|-------------|--------|
|----------------|--------------|-------------|--------|

Fees charged

| | |
|---|--------|
| Total fees charged in this billing period | \$0.00 |
|---|--------|

Interest charged

| | |
|---|--------|
| Total interest charged in this billing period | \$0.00 |
|---|--------|

2020 totals year-to-date

| | |
|--------------------------------|----------|
| Total fees charged in 2020 | \$117.00 |
| Total interest charged in 2020 | \$0.00 |

Interest charge calculation

Days in billing cycle: 29

Your Annual Percentage Rate (APR) is the annual interest rate on your account.

| Balance type | Annual percentage rate (APR) | Balance subject to interest rate | Interest charge |
|--------------------------------------|------------------------------|----------------------------------|-----------------|
| PURCHASES | | | |
| Standard Purch | 0.00% | \$10,926.33 (D) | \$0.00 |
| (Introductory Rate Expires 08/30/20) | | | |
| ADVANCES | | | |
| Standard Adv | 25.24% (V) | \$0.00 (D) | \$0.00 |

Your Annual Percentage Rate (APR) is the annual interest rate on your account. APRs followed by (V) may vary. Balances followed by (D) are determined by the daily balance method (including current transactions).

Account messages

Minimum Payment Due includes past due amounts. Your account may be with a collection vendor and when you call our number, you may be referred to the vendor. You may reach us at the toll-free number shown above Monday-Thursday 8am to 6 pm or Friday 8am to 5pm, Central Time. 1-800-846-8444. TTY 1-855-371-0353.

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