

Assigned for all purposes to: Chatsworth Courthouse, Judicial Officer: Karen Moskowitz

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File No.: 73913

SUPERIOR COURT OF CALIFORNIA

COUNTY OF LOS ANGELES

PORTFOLIO RECOVERY ASSOCIATES, LLC

Plaintiff,

v.

FLORENDA CORRAL,
and DOES 1 to 25.

Defendant(s).

CASE NO. **22CHLC05165**

COMPLAINT FOR:

(1) Account Stated

PRAYER AMOUNT: \$3,663.71

LIMITED CIVIL

Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, ("Plaintiff") alleges:

1. Plaintiff is a limited liability company.

2. This court is the proper court because Plaintiff is informed and believes that Defendant,

FLORENDA CORRAL ("Defendant"), is a resident of LOS ANGELES County, State of California.

3. At all times herein mentioned, Defendants, and each of them, were the principals, agents, employers, employees, masters, or servants of each of their co-defendants and ratified, adopted or approved the acts or omissions alleged herein, and each defendant, in doing the things alleged, were acting in the course and scope of said authority of such agents, servants, and employees.

1 4. This suit concerns a credit account that was purchased by Plaintiff on or after January 1, 2014 and,
2 therefore, is subject to California Civil Code § 1788.50; *et seq.*

3
4 **COMPLIANCE WITH CIVIL CODE § 1788.50, *et seq.***

5 Pursuant to California Civil Code § 1788.58(a)(1)-(9):

6 5. Plaintiff is a debt buyer.

7 6. A SYNCHRONY BANK/ TJX credit account was issued to Defendant on or about April 11,
8 2017. Defendant used, or authorized the use of, the credit account to make purchases and/or
9 transactions. Defendant received periodic billing statements for the credit account. Defendant
10 defaulted in making the required payments. Subsequently, Plaintiff was assigned and transferred all
11 rights, title and interest in the credit account. The account was assigned, transferred and sold to
12 Plaintiff by SYNCHRONY BANK.
13

14 7. Plaintiff is the sole owner of the credit account at issue, or has authority to assert the rights of all
15 owners of the debt.
16

17 8. The balance at charge-off was \$3,698.71. Plaintiff is not seeking to recover any post charge-off
18 fees or interest.

19 9. The date of last payment on the credit account was August 15, 2019.

20 10. The name and an address of the creditor at the time of charge-off was

21 SYNCHRONY BANK 170 E ELECTION RD DRAPER UT 84020
22

23 At the time of charge-off, the charge-off creditor's account number associated with the debt ended
24 in XXXXXXXXXXXXXXX3373.

25 11. The name and last known address of the Defendant as they appeared in the charge-off
26 creditor's records prior to the sale of the debt: FLORENDA CORRAL, 19122 MALDEN ST,
27 NORTHRIDGE, CA, 91324-4229.
28

1 12. The names and addresses of all persons or entities that purchased the debt after charge off,
2 include the Plaintiff debt buyer: Portfolio Recovery Associates, LLC, which maintains an address at
3 120 Corporate Blvd, Norfolk, VA 23502.
4

5 13. Plaintiff has complied with the requirements of Civil Code **Section 1788.52**. Notably, Section
6 1788.52(a)(7) requires that Plaintiff possess the California debt buyer license number when making any
7 written statements to a debtor in an attempt to collect a consumer debt. The legislation that created this
8 requirement also stated that the licensing provisions **shall become operative January 1, 2022**, and that
9 a debt collector that submits an application prior to January 1, 2022 may operate pending the approval
10 or denial of the application.
11

12 14. Attached hereto as Exhibit A is a true and correct copy of a document required by section
13 1788.58(b) of the California Civil Code.
14

15 **FIRST CAUSE OF ACTION:**

16 **ACCOUNT STATED**

17 15. Plaintiff alleges and incorporates by reference the foregoing paragraphs.

18 16. Within the last four years, an account was stated in writing between Defendant and
19 SYNCHRONY BANK/ TJX and on the account a balance was stated to be due to SYNCHRONY
20 BANK/ TJX, from Defendant. Defendant expressly or impliedly agreed to pay SYNCHRONY BANK/
21 TJX, that balance. Attached hereto as Exhibit B is a true and correct copy of a billing statement showing
22 the balance due and owing.
23

24 17. Before the commencement of this action, Plaintiff was assigned the credit account and
25 indebtedness. Plaintiff is now the owner and holder of the credit account.

26 18. Plaintiff has made demand on Defendant for repayment of the credit account, but Defendant has
27 failed to pay the balance due.
28

1 19. Payments, set-offs, credits or allowances, if any, at or after charge off, have been posted to the
2 credit account.

3
4 20. The current balance presently due and owing is \$3,663.71.

5 **WHEREFORE**, Plaintiff prays for judgment against Defendant as follows:

6 **On the First Cause of Action:**

- 7 1. For the unpaid principal balance of \$3,663.71;
8 2. Costs of suit; and
9 3. Any such other relief as the Court may deem just and proper.
10

11 DATED: March 04, 2022
12
13
14




15 By: _____

- 16 ☒ Jordan Cook, Esq. Bar No. 179720
17 ☐ Emily Pierce, Esq. Bar No. 240084
18 ☐ Kristen Brinkerhoff, Esq. Bar No. 263579
19 ☐ Lori Williams, Esq. Bar No. 242985
20 ☐ Michelle Mitchell, Esq. Bar No. 221841
21 Attorneys for Plaintiff
22 **Portfolio Recovery Associates, LLC**
23 **www.PRApay.com**
24
25
26
27
28

EXHIBIT A

Payment Information

	New Balance:	\$3,198.77
	Amount Past Due:	\$218.00
	Total Minimum Payment Due:	\$363.00
	Overlimit Amount:	\$198.77
	Payment Due Date:	09/27/2019

Payments must be received by 5pm ET on 09/27/2019 if mailed, or by 11:59pm ET on 09/27/2019 for online and phone payments.

NOTICE: We may convert your payment into an electronic debit. See reverse for details, Billing Rights and other important information.

Late Payment Warning: If we do not receive your Total Minimum Payment Due by the Payment Due Date listed above, you may have to pay a late fee up to \$35.00.

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	13 years	\$8,415.00

If you would like information about **credit counseling services**, call 1-877-302-8775.

Account Summary

Previous Balance as of 08/05/2019	\$3,110.75
Payments	- 25.00
Fees Charged	+ 35.00
Interest Charges	+ 78.02
New Balance as of 09/04/2019	\$3,198.77

Credit Limit	\$3,000
Available Credit	OVERLIMIT
Cash Limit	\$600
Available Cash	OVERLIMIT

TJX Rewards Summary

Points Earned	0
Points to Next Reward	197

love **REWARDS?**

Earn 5% back in Rewards every time you shop our family of stores with your TJX Rewards® Platinum Mastercard®. That's a \$10 Rewards Certificate for every \$200 you spend.*



* Purchases subject to credit approval. 5% back is equal to 5 points for every \$1 spent. See Rewards Program Terms for details.

YOU CAN *shop* THEM ALL.



shop online at tjmaxx.com & sierra.com

Detach and mail this portion with your check. Do not include any correspondence with your check.



Payment Enclosed:
Please use blue or black ink.

Amount Past Due	Overlimit Amount
\$218.00	\$198.77

Account Number	3373
New Balance	\$3,198.77
Total Minimum Payment Due	\$363.00
Payment Due Date	09/27/2019

Amount Enclosed **\$**

New address or email? Print changes on back.

FLORENDA SAH CORRAL
13750 OSBORNE ST
ARLETA CA 91331-6033

Make TJX REWARDS/SYNCRB
Payment PO BOX 530949
to: ATLANTA, GA 30353-0949

Need an extra card?

Call us at 1-866-448-4367

TJX Rewards Detail

Your TJX Rewards Summary as of
Beginning Points Balance
Points Earned - Total
Points Redeemed as Rewards Certificates
Current Points Balance

09/04/2019
803
0
0
803



803 Current Points Balance
197 Points to Next Rewards Certificate

Continue to *shop* with your card
and you'll be on your way to
your next Rewards Certificate(!)



Transaction Detail

Date	Reference #	Description	Amount
Payments			-\$25.00
08/15	85243667300XTMJG5	PHONE PAYMENT-THANK YOU	-\$25.00
Total Fees Charged This Period			\$35.00
08/27		LATE FEE	\$35.00
Total Interest Charged this Period			\$78.02
09/04		INTEREST CHARGE ON PURCHASES	\$78.02
09/04		INTEREST CHARGE ON CASH ADVANCES	\$0.00

2019 Year-to-Date Fees and Interest	
Total Fees Charged	\$95.00
Total Interest Charged	\$354.87
Total Interest Paid	\$131.04

Interest Charge Calculation

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

(v) = Variable Rate

Type of Balance	Expiration Date	Annual Percentage Rate	Balance Subject to Interest Rate	Interest Charge
Purchases	N/A	29.24% (v)	\$3,141.53	\$78.02
Cash Advances	N/A	29.99%	\$0.00	\$0.00

Cardholder News and Information

YOUR ACCOUNT IS PAST DUE. PLEASE PAY THE MINIMUM PAYMENT DUE OR CONTACT THIS OFFICE AT THE PHONE NUMBER LISTED ON YOUR STATEMENT.

Did you know your Mastercard offers Mastercard ID Theft Protection. For more information about this benefit or to view the current benefits offered by Mastercard, please visit: www.mastercard.com/corecredit-GTB.

This is a duplicate courtesy copy of your most recent billing statement. You can still view and pay your electronic statement online.

Synchrony Bank may continue to obtain information, including employment and income information from others about you (including requesting reports from consumer reporting agencies and other sources) to review, maintain or collect your account.

**Purchases subject to credit approval. See Rewards Program Terms for details.

The TJX Rewards Platinum Mastercard is issued by Synchrony Bank pursuant to a license by Mastercard International Incorporated. Mastercard is a registered trademark of Mastercard International Incorporated.

JOIN US saturday 9/21

BE A (MEMBER) MORNING PERSON • 8:30-10:30 AM*
Shop early and grab a FREE custom shopping tote** to fill with new fall faves!

*Event hours from 8:30 - 10:30am, private shopping for TJX Rewards credit cardholders is from 8:30 - 9:30am. Event hours vary at certain stores. Check your local store for event time and regular store hours.

**Free shopping tote available while supplies last. Limit one (1) shopping tote per member. Members must present their TJX Rewards credit card to be eligible for the free gift.

EXHIBIT B

The TJX Rewards® Platinum Mastercard®

Visit us at tjx.syf.com or Call 1-877-822-2015

FLORENDA SAH CORRAL
Account Number ending in **3373**
30 Day Billing Cycle from 12/05/2019 to 01/03/2020

PAGE 1 of 3

Payment Information

	New Balance:	\$3,663.71
	Amount Past Due:	\$813.00
	Total Minimum Payment Due:	\$969.00
	Overlimit Amount:	\$663.71
	Payment Due Date:	01/27/2020

Payments must be received by 5pm ET on 01/27/2020 if mailed, or by 11:59pm ET on 01/27/2020 for online and phone payments.

NOTICE: We may convert your payment into an electronic debit. See reverse for details, Billing Rights and other important information.

Late Payment Warning: If we do not receive your Total Minimum Payment Due by the Payment Due Date listed above, you may have to pay a late fee up to \$35.00.

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	12 years	\$8,414.00

If you would like information about **credit counseling services**, call 1-877-302-8775.

Account Summary

Previous Balance as of 12/05/2019	\$3,544.54
Fees Charged	+ 35.00
Interest Charges	+ 84.17
New Balance as of 01/03/2020	\$3,663.71

Credit Limit	\$3,000
Available Credit	\$0
Cash Limit	\$600
Available Cash	\$0






TJX Rewards Summary

Points Earned	0
Points to Next Reward	1,000

**KEEP YOUR RESOLUTION
TO *save!***

Find great savings on brand names and
EARN 5% BACK IN REWARDS*
with your TJX Rewards credit card at our family of stores.

YOU CAN *shop* THEM ALL

tjmaxx.com | marshalls.com | sierra.com

*Purchases subject to credit approval. See your Rewards Program Terms for details.

8640 A8J 1 7 4 200103 EX PAGE 1 of 3 1410 1500 T302 01ED8640



Use blue or black ink,
detach & mail with your
check.

Amount Past Due	Overlimit Amount
\$813.00	\$663.71

Account Number	3373
New Balance	\$3,663.71
Total Minimum Payment Due	\$969.00
Payment Due Date	01/27/2020
Amount Enclosed	\$

No other correspondence please.
Print new address or email changes on back.

FLORENDA SAH CORRAL
13429 BRACKEN ST
ARLETA CA 91331-5708

Make TJX REWARDS/SYNCB
Payment PO BOX 530949
to: ATLANTA, GA 30353-0949

Need an extra card?

Call us at 1-866-448-4367

TJX Rewards Detail

Your TJX Rewards Summary as of
Beginning Points Balance
Points Earned - Total
Points Redeemed as Rewards Certificates
Current Points Balance

01/03/2020
0
0
0
0



1,000 Points to Next Rewards Certificate

**Continue to shop with your card
and you'll be on your way to
your next Rewards Certificate(!)**



Transaction Detail

Date	Reference #	Description	Amount
Total Fees Charged This Period			\$35.00
12/27		LATE FEE	\$35.00
Total Interest Charged this Period			\$84.17
01/03		INTEREST CHARGE ON PURCHASES	\$84.17
01/03		INTEREST CHARGE ON CASH ADVANCES	\$0.00

2020 Year-to-Date Fees and Interest	
Total Fees Charged	\$35.00
Total Interest Charged	\$84.17
Total Interest Paid	\$0.00

Interest Charge Calculation

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

(v) = Variable Rate

Type of Balance	Expiration Date	Annual Percentage Rate	Balance Subject to Interest Rate	Interest Charge
Purchases	N/A	28.49% (v)	\$3,594.30	\$84.17
Cash Advances	N/A	29.99%	\$0.00	\$0.00

Cardholder News and Information

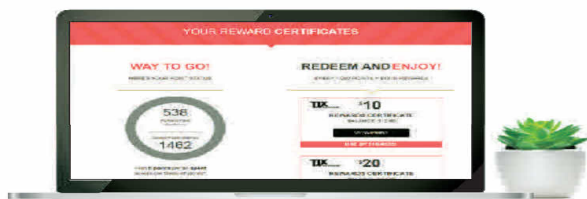
YOUR ACCOUNT IS PAST DUE. PLEASE PAY THE MINIMUM PAYMENT DUE OR CONTACT THIS OFFICE AT THE PHONE NUMBER LISTED ON YOUR STATEMENT.

Did you know your Mastercard offers Mastercard ID Theft Protection. For more information about this benefit or to view the current benefits offered by Mastercard, please visit: www.mastercard.com/corecredit-GTB.

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The TJX Rewards Platinum Mastercard is issued by Synchrony Bank pursuant to a license by Mastercard International Incorporated. Mastercard is a registered trademark of Mastercard International Incorporated.

EASY ACCESS TO YOUR ACCOUNT ANYTIME, ANYWHERE



- View and print your Rewards Certificates 24/7
- Track your point status
- Pay your bill
- Enroll in Electronic Statements to get your Rewards Certificates delivered right to your email! Visit the 'statements' section to enroll.

Go to tjxrewards.com to register your card.

