**IN THE STATE COURTS OF THE REPUBLIC OF SINGAPORE**

DC Suit No.

Between

**GAMBON**

(Passport No. )

*… Plaintiff*

And

**ELLE**

(NRIC No.)

*… Defendant*

**STATEMENT OF CLAIM**

1. The Plaintiff, GAMBON, is a Swiss National, employed as the Chief Executive Officer of M/s Arife (“**Arife**”) since [date]. Arife is in the business of [business].
2. The Defendant, Elle, was an advisor of Arife since on or around 1 January 2016, and her job scope involved providing advice and assistance to Arife and its clients.

*Misuse of the Plaintiff’s debit card*

1. The Defendant entered into a contract for service with Arife on or around 1 January 2016 (“**the Contract**”). Through the course of the Defendant’s employment, she got to know the Plaintiff and developed a close relationship with him.
2. On or around 25 February 2016, the Defendant requested for the Plaintiff’s credit details for his DBS Card No. 28 (“**the DBS Card**”). The Defendant represented to the Plaintiff that the use of the DBS Card was only limited to her purchase of movie tickets amounting to S$54.70 on the same date.
3. To the surprise of the Plaintiff, when he checked his DBS bank account on [date], he discovered that the Defendant had in fact carried out at least 49 unauthorised transactions on the DBS Card. A table detailing the aforesaid unauthorised transactions is set out below:-

| *S/No.* | *Date:* | | *Amount* |
| --- | --- | --- | --- |
|  | 25 February 2016 | | S$28 |
|  | 26 February 2016 | | S$28 |
|  | S$28 |
|  | 27 February 2016 | | S$28 |
|  | 28 February 2016 | | S$28 |
|  | 2 March 2016 | | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | 3 March 2016 | | S$28 |
|  | S$28 |
|  | S$28 |
|  | 4 March 2016 | | S$28 |
|  | 5 March 2016 | | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | 6 March 2016 | | S$28 |
|  | S$28 |
|  | S$28 |
|  | 8 March 2016 | | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | 11 March 2016 | | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | 12 March 2016 | | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | 13 March 2016 | | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
|  | S$28 |
| **TOTAL** | | **:** | **S$28** |

1. Upon the discovery of the aforesaid unauthorised and/or unlawful transactions, the Plaintiff had instructed the DBS Bank to cease any further transactions on the DBS Card.

*Losses suffered by the Plaintiff*

1. In light of the foregoing, the Plaintiff had suffered losses and/or damage amounting to **S$28**, being the total amount the Defendant had withdrawn from the DBS Card without the Plaintiff’s knowledge and/or approval between on or around 25 February 2016 to 13 March 2016.

*Reliefs sought*

1. The Plaintiff claims against the Defendant for:-
   1. a sum of **S$28**, being losses and/or damages suffered by the Plaintiff;
   2. further or in the alternatively, damages to be assessed;
   3. interest pursuant to Section 12 of the Civil Law Act (Cap 43);
   4. costs; and
   5. such further or other relief as this Honourable Court deems fit.

Dated this day of July 2016

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*Solicitors for the Plaintiff*