



IN THE MONTGOMERY COUNTY MUNICIPAL COURT EASTERN DIV.  
MONTGOMERY COUNTY, OHIO

PORTFOLIO RECOVERY ASSOCIATES, LLC  
120 Corporate Blvd  
Norfolk, VA 23502-9901

CASE NO. 24CVF450

PLAINTIFF

JUDGE:

-vs-

COMPLAINT FOR MONEY

HEATHER MASSEY  
5036 TAYLORSVILLE RD  
HUBER HEIGHTS, OH 45424-2448

FILED  
MUNICIPAL COURT  
EASTERN DIVISION  
2024 APR -5 AM 10:58

DEFENDANT

1. Plaintiff, PORTFOLIO RECOVERY ASSOCIATES, LLC, is a foreign Limited Liability Company registered to do business in the State of Ohio and the Defendant, upon information and belief, is an individual who resided and/or maintains an address and/or domicile sufficient to allow the Court to maintain jurisdiction and venue of this matter and action.

2. At Defendant's request, Defendant was granted an extension of credit from SYNCHRONY BANK and which was issued to Defendant as a SAMS CLUB credit account.

3. PORTFOLIO RECOVERY ASSOCIATES, LLC, is now the owner of said account, purchasing the same and entitled to all rights as owner thereof. See attached supporting Exhibits.

4. Defendant is in default for failing to make payments.

5. The amount due and owing on the account by the Defendant to PORTFOLIO RECOVERY ASSOCIATES, LLC is \$1,357.72. See attached supporting Exhibits. The full account records are not attached hereto because, upon information and belief, Plaintiff is not the original creditor, and copies were sent monthly to the Defendant, and are/were in Defendant's possession.

6. Although Plaintiff has notified the Defendant of the above mentioned assignment, the Defendant has failed to liquidate the balance due and owing, despite due demand made by Plaintiff upon Defendant.

964201

**WHEREFORE**, the Plaintiff prays for a Judgment against the Defendant in the amount of \$1,357.72 plus the court cost to which Plaintiff may be entitled.



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964201



4500 Munson St NW  
Canton OH 44718, U.S.

## BILL of SALE

### PRA (SRFLX09S) – PLCC 120 MP – January 2022

IC\_SRFLX09S\_DMPLA\_DebtManager-20220121100852307155000-17123

For value received and in further consideration of the mutual covenants and conditions set forth in the Forward Flow Accounts Purchase Agreement (the “Agreement”), dated as of this 11<sup>th</sup> day of February, 2021 by and between Synchrony Bank formerly known as GE Capital Retail Bank; RFS Holding, L.L.C., Synchrony Card Funding, LLC and Retail Finance Credit Services, LLC., (“Seller”) and Portfolio Recovery Associates, LLC (“Buyer”), Seller hereby transfers, sells, conveys, grants, and delivers to Buyer, its successors and assigns, without recourse except as set forth in the Agreement, to the extent of its ownership, the Accounts as set forth in the Notification Files (as defined in the Agreement), delivered by Seller to Buyer on or about 20<sup>th</sup> of January 2022, and as further described in the Agreement.

Synchrony Bank

*Lynne Fisher*  
By: Lynne Fisher (Jan 28, 2022 14:29 EST)  
Lynne Fisher  
Title: SVP Recovery Operations

RFS Holding LLC

*Lynne Fisher*  
By: Lynne Fisher (Jan 28, 2022 14:29 EST)  
Lynne Fisher  
Title: Duly Authorized Signatory

Synchrony Card Funding, LLC

*Lynne Fisher*  
By: Lynne Fisher (Jan 28, 2022 14:29 EST)  
Lynne Fisher  
Title: Duly Authorized Signatory

Retail Finance Credit Services, LLC

*Lynne Fisher*  
By: Lynne Fisher (Jan 28, 2022 14:29 EST)  
Lynne Fisher  
Title: Vice President

AFFIDAVIT

Commonwealth of Virginia  
City of Norfolk ss.

I, the undersigned, Sharron Max, Custodian of Records, for Portfolio Recovery Associates, LLC hereby depose, affirm and state as follows:

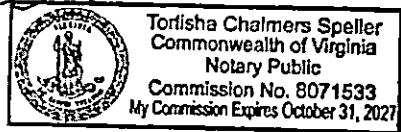
1. I am competent to testify to the matters contained herein.
2. I am an authorized employee of Portfolio Recovery Associates, LLC, ("Account Assignee") which is doing business at Riverside Commerce Center, 120 Corporate Boulevard, Norfolk, Virginia, and I am authorized to make the statements, representations and averments herein, and do so based upon a review of the business records of the Original Creditor **SYNCHRONY BANK/SAMS CLUB** and those records transferred to Account Assignee from **SYNCHRONY BANK** ("Account Seller"), which have become a part of and have integrated into Account Assignee's business records, in the ordinary course of business.
3. According to the business records, which are maintained in the ordinary course of business, the account, and all proceeds of the account are now owned by the Account Assignee, all of the Account Seller's interest in such account having been sold, assigned and transferred by the Account Seller on **01/20/2022**. Further, the Account Assignee has been assigned all of the Account Seller's power and authority to do and perform all acts necessary for the settlement, satisfaction, compromise, collection or adjustment of said account, and the Account Seller has retained no further interest in said account or the proceeds thereof, for any purpose whatsoever.
4. According to the records transferred to the Account Assignee from Account Seller, and maintained in the ordinary course of business by the Account Assignee, there was due and payable from **HEATHER MASSEY** ("Debtor and Co-Debtor") to the Account Seller the sum of **\$1,800.31** with respect to account number ending in **9771**, as of the date of **02/21/2021** with there being no known uncredited payments, counterclaims or offsets against the said debt as of the date of the sale.
5. According to the account records of said Account Assignee, after all known payments, counterclaims, and/or setoffs occurring subsequent to the date of sale, Account Assignee claims the sum of **\$1,357.72** as due and owing as of the date of this affidavit.
6. Plaintiff believes that the defendant is not a minor or an incompetent individual, and declares that the Defendant is not on active military service of the United States.

Portfolio Recovery Associates, LLC

Sharron Max  
By: Sharron Max, Custodian of Records

Subscribed and sworn to before me on DEC 19 2023

Tortisha Speller  
Notary Public



**Payment Information**

	New Balance:	\$1,761.31
	Amount Past Due:	\$457.00
	Total Minimum Payment Due:	\$549.00
	Overlimit Amount:	\$371.31
	Payment Due Date:	02/18/2021

Payments must be received by 5pm ET on 02/18/2021 if mailed, or by 11:59pm ET on 02/18/2021 for online and phone payments.

To make a payment, please visit us online or mail your payment using the coupon below. Payments are also accepted at your local CheckFreePay® or MoneyGram locations\*. \* Fees may apply.

**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 \$39.00.

**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	4 years	\$2,477.00

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

**Account Summary**

Previous Balance as of 12/26/2020	\$1,687.87	Credit Limit	\$1,390
Fees Charged	+ 39.00	Available Credit	\$0
Interest Charges	+ 34.44	Cash Advance/Quick Cash Limit	\$278
New Balance as of 01/26/2021	\$1,761.31	Available Cash	\$0
32 Day Billing Cycle from 12/26/2020 to 01/26/2021			

**Transaction Detail**

Date	Reference #	Description	Amount
<b>Total Fees Charged This Period</b>			<b>\$39.00</b>
01/18		LATE FEE	\$39.00

(Continued on next page)

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

Account Number	██████████ 9771
New Balance	\$1,761.31
Total Minimum Payment Due	\$549.00
Payment Due Date	02/18/2021

Amount Past Due	Overlimit Amount
\$457.00	\$371.31

Amount Enclosed \$

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

HEATHER MASSEY  
5036 TAYLORSVILLE RD  
HUBER HEIGHTS OH 45424-2448

Make SAM'S CLUB/SYNCHRONY BANK  
Payment PO BOX 530942  
to: ATLANTA, GA 30353-0942

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