

MLG - 5153947

**IN THE COUNTY COURT OF THE
SEVENTH JUDICIAL CIRCUIT IN AND
FOR FLAGLER COUNTY, FLORIDA**

SMALL CLAIMS DIVISION

CASE NO. 2025 SC 000478

LVNV FUNDING LLC
Plaintiff,

vs.

RAMON MARRERO
Defendant.

_____/

STATEMENT OF CLAIM

COMES NOW the Plaintiff, LVNV FUNDING LLC, by and through its undersigned attorney, sues Defendant RAMON MARRERO , and alleges:

GENERAL ALLEGATIONS

1. This is an action for damages in an amount less than or equal to \$8,000.00, exclusive of interest, costs and attorney fees, and comes within the jurisdiction of this Court.
2. Plaintiff is a foreign corporation authorized to bring this action pursuant to Fla. Stat. § 607.1501 (2)(a).
3. Defendant is a resident of FLAGLER County, Florida.
4. All conditions precedent to the bringing of this action has been performed, have occurred or have been waived.

COUNT I

(ACCOUNT STATED)

5. Plaintiff incorporates and realleges paragraphs 1-4.

6. Defendant made purchases and/or received cash advances utilizing credit extended by CREDIT ONE BANK, N.A. (the 'Creditor') , account number XXXXXXXXXXXX2246.
7. In accordance with the transactions made by Defendant on the account (the 'Account') heretofore mentioned, Creditor and Defendant agreed to the resulting balance.
8. Creditor rendered statement(s) of the Account to Defendant, copies of which are attached hereto and incorporated herein as Exhibit 'A', and Defendant did not object to the statement(s).
9. Defendant failed and/or refused to pay for said purchases or cash advances as agreed, or otherwise.
10. Plaintiff has purchased the debt incurred by Defendant and is the legal owner and holder of the debt.
11. Defendant owes Plaintiff \$2,406.28.

WHEREFORE, Plaintiff demands judgment against Defendant for the sum of \$2,406.28 plus costs, and such other and further relief as the Court may deem just and proper.

COUNT II

(UNJUST ENRICHMENT)

12. Plaintiff incorporates and realleges paragraphs 1-4 and paragraph 10.
13. The Creditor has conferred a benefit on Defendant by providing credit for cash advances, products and/or goods and services.
14. Defendant has knowledge of the benefit and the use thereof by Defendant constitutes an unjust enrichment of Defendant at Plaintiff's expense.

15. Defendant has accepted or retained the benefit conferred and the circumstances are such that it would be inequitable for the Defendant to retain the benefit without paying fair value for it. Defendant has failed to pay for said benefit and Defendant has therefore been unjustly enriched.
16. As a result of the unjust enrichment of Defendant, Plaintiff has been damaged in an amount in equal to \$2,406.28.

WHEREFORE, Plaintiff demands judgment against Defendant for the sum of \$2,406.28 plus costs, and such other and further relief as the Court may deem just and proper.

Mandarich Law Group, LLP

/s/ Carolyn Karetis, Esq.

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Attorneys for Plaintiff

DESIGNATION OF EMAIL ADDRESS

Pursuant to Fla. R. Jud. Admin. 2.516 Plaintiff's Counsel hereby designates
florida@mandarichlaw.com
as its primary email address for the receipt of pleadings.

EXHIBIT A

CREDIT ONE BANK CREDIT CARD STATEMENT
Account Number [REDACTED] 2246
March 22, 2024 to April 21, 2024

SUMMARY OF ACCOUNT ACTIVITY		
Previous Balance		\$2,317.84
Payments	-	\$0.00
Other Credits	-	\$0.00
Purchases	+	\$0.00
Balance Transfers	+	\$0.00
Cash Advances	+	\$0.00
Fees Charged	+	\$39.00
Interest Charged	+	\$49.44
New Balance		\$2,406.28
Credit Limit		\$1,750.00
Available Credit		\$0.00
Statement Closing Date		04/21/24
Days in Billing Cycle		31

QUESTIONS?

Call Customer Service or Report
a Lost or Stolen Credit Card 1-877-825-3242
Outside the U.S. Call 1-702-405-2042
Please send billing inquiries and correspondence to:
P.O. Box 98873, Las Vegas, NV 89193-8873

PAYMENT INFORMATION		
New Balance		\$2,406.28
Past Due Amount		\$721.00
Amount Due This Period		\$1,724.28
Minimum Payment Due		\$2,406.28
Payment Due Date		05/17/24
Late Payment Warning: If we do not receive your minimum payment by the date listed above, you may have to pay a late fee up to \$39.		
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 the statement in about...	And you will end up paying an estimated total of...
Only the minimum payment	1 month(s)	\$2,406.00
If you would like a location for credit counseling services, call 1-866-515-5720. Or you may visit www.justice.gov/ust/list-credit-counseling-agencies-approved-pursuant-11-usc-111 .		

TRANSACTIONS				
Reference Number	Trans Date	Post Date	Description of Transaction or Credit	Amount
Payments, Credits, and Adjustments				
Fees				
	04/21	04/21	LATE FEE	39.00
			TOTAL FEES FOR THIS PERIOD	39.00
Interest Charged				
	04/21	04/21	Interest Charge on Purchases	40.52
	04/21	04/21	Interest Charge on Cash Advances	8.92
			TOTAL INTEREST FOR THIS PERIOD	49.44
2024 Totals Year-to-Date				
Total fees charged in 2024			\$156.00	
Total interest charged in 2024			\$191.98	

Your account is currently closed.

INTEREST CHARGE CALCULATION			
Your Annual Percentage Rate (APR) is the annual interest rate on your account.			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
Purchases	29.65%(v)	\$1,639.90	\$40.52
Cash Advances	29.65%(v)	\$360.99	\$8.92
STANDARD BALANCE TRANSFER	29.65%(v)	\$0.00	\$0.00
(v) = Variable Rate			

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Please return this portion with your payment, and write your account number on your check, made payable to CREDIT ONE BANK.



P.O. BOX 98873
LAS VEGAS, NV 89193-8873

For address, telephone and email changes,
please complete the reverse side.
Or, update your contact information online
at www.CreditOneBank.com.

PAY YOUR BILL ONLINE at CreditOneBank.com

Account Number: [REDACTED] 2246
New Balance: \$2,406.28
Minimum Payment Due: \$2,406.28
Payment Due Date: 05/17/24

AMOUNT ENCLOSED:

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CREDIT ONE BANK
PO BOX 60500
CITY OF INDUSTRY CA 91716-0500
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RAMON MARRERO
54 RICKENBACKER DR
PALM COAST FL 32164-6532