

IN THE COUNTY COURT, IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO:

CAVALRY SPV I, LLC

Plaintiff,

vs.

JACQUELINE M ROCHA

Defendant(s).

STATEMENT OF CLAIM

Plaintiff, by and through its undersigned counsel, sues the Defendant(s) JACQUELINE M ROCHA and states the following:

1. Damages in this action do not exceed \$5,000.00.
2. Defendant(s) resides or regularly conducts business in Broward County, Florida.
3. Citibank, N.A. was the original creditor (or sucessor in interest to the original creditor) of the debt at issue in this matter and opted to relinquish ownership of same. Cavalry SPV I, LLC, by virtue of legal or equitable assignment, is currently the owner of the debt as evidenced by the document(s) attached hereto. All conditions precedent required to bring this action have occured or have been performed.

COUNT I - ACCOUNT STATED
XXXXXXXXXXXX6412

Plaintiff repeats and realleges each and every material allegation set forth in paragraphs 1 through 3 hereinabove and incorporates the same by reference.

4. Before the institution of this action, Defendant(s) and Plaintiff's predecessor in interest had business transactions between them wherein Plaintiff's predecessor in interest provided goods, services, money, or extended credit to Defendant(s) with the expectation that Defendant(s) would pay for same, and on or about the date of the attached invoice(s), statement(s), or account summary, Plaintiff's predecessor in interest and Defendant(s) agreed upon, or consented to, the resulting balance.

5. Plaintiff's predecessor in interest rendered to Defendant(s) invoice(s), statement(s), or an account summary a copy or copies of which is/are attached hereto and incorporated herein.

6. Defendant(s) received copies of the invoice(s), statement(s), or account summary and did not object to same.

7. The balance due on the attached invoice(s), statement(s), or summary is \$1,341.53 .

8. Defendant(s) has failed to pay the amount due.

9. Defendant(s) owes the Plaintiff the principal sum of \$1,341.53.

WHEREFORE, Plaintiff requests judgment against Defendant(s) for the sum of \$1,341.53 plus costs (if any).

COUNT II - MONEY LENT
XXXXXXXXXXXX6412

Plaintiff repeats and realleges each and every material allegation set forth in paragraphs 1 through 3 herein above and incorporates the same by reference.

10. As of the date of this lawsuit, Defendant(s) owes Plaintiff as successor in interest to CITIBANK, N.A. the principal sum of \$1,341.53 for money lent to Defendant(s) on or before the date of the attached invoice(s), statement(s), or summary attached.

WHEREFORE, Plaintiff requests judgment against Defendant(s) for the sum of \$1,341.53 plus costs (if any).

COUNT III – QUANTUM MERUIT
XXXXXXXXXXXX6412

Plaintiff repeats and realleges each and every material allegation set forth in paragraphs 1 through 3 hereinabove and incorporates the same by reference.

11. Prior to this action, Plaintiff's predecessor in interest extended credit, loaned money, or provided goods or services to Defendant(s).

12. Defendant(s) benefited from extension of credit, money, goods, or services provided Defendant(s) by Plaintiff's predecessor in interest.

13. Defendant(s) has/have failed to pay Plaintiff or Plaintiff's predecessor in interest for the extension of credit, money, goods, or services.

14. It would be inequitable for Defendant(s) to retain the benefit of the extension of credit, money, goods, or services received by Defendant(s) without paying Plaintiff or Plaintiff's predecessor in interest for same.

15. The failure of Defendant(s) to pay the Plaintiff or Plaintiff's predecessor in interest for the extension of credit, money, goods, or services has caused the Defendant(s) to be unjustly enriched at the expense of the Plaintiff.

16. As of the date of this lawsuit, Defendant(s) owes the Plaintiff the principal sum of \$1,341.53.

WHEREFORE, Plaintiff requests judgment against Defendant(s) for the sum of \$1,341.53 plus costs (if any).

Respectfully submitted,

Jeffrey Kahn, Esq.
Florida Bar #: 0519200
Deryl Hunt, Esq.
Florida Bar #: 0123692
Post Office Box 934788
Margate, Florida 33093-4788
Telephone: (954) 935-6966
Facsimile: (954)935-6975
Primary Email: Service@HuntKahnLaw.com

/s/ Deryl Hunt, #0123692

May 5, 2017

Contract ID: CVIMU1TB092616
Document ID: 092016CVIMU1TB81
Document ID: 092016CVIMU1TB81
Document ID: 092016CVIMU1TB81

BILL OF SALE AND ASSIGNMENT

THIS BILL OF SALE AND ASSIGNMENT dated September 29, 2016, is by Citibank, N.A., a national banking association organized under the laws of the United States, located at 701 East 60th Street North, Sioux Falls, SD 57117 (the "Bank") to Cavalry SPV I, LLC, organized under the laws of the state of Delaware, with its headquarters/principal place of business at 500 Summit Lake Drive, Suite 400, Valhalla, NY 10595 ("Buyer").

For value received and subject to the terms and conditions of the Purchase and Sale Agreement dated September 26, 2016, between Buyer and the 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)
Terri E. Bergman, SVP
SED: 0200491824
Name: Citibank, N.A.
11000 North 11th Street, Suite 400
Kansas City, MO 64116
terri.bergman@citi.com
816-205-8800
Title: _____

Contract ID: CV1MU1TB092616
Document ID: 092016CV1MU1TBA1
Document ID: 092016CV1MU2TBA1
Document ID: 092016CV1MU3TBA1

EXHIBIT 1
ASSET SCHEDULE

The individual Accounts transferred are described in the final electronic file and delivered by the Bank to Buyer, the same deemed attached hereto by this reference.

Lot	Sale ID	# of Accounts	Sale Balance	Cut-Off Date
Brands Tertiary Bulk Lot 1	092016CV1MU1TB			9/20/2016
Brands Tertiary Bulk Lot 2	092016CV1MU2TB			9/20/2016
Brands Tertiary Bulk Lot 3	092016CV1MU3TB			9/20/2016

SCHEDULE A

0763

Purchase Date:9/29/2016

ACCOUNT NUMBER	1	
SALE AMOUNT	\$1,341.53	
ACCOUNT OPEN DATE	07-Apr-12	
LAST PAYMENT DATE	18-Aug-14	
CONSUMER FIRST AND MIDDLE NAME	JACQUELINE M	
CONSUMER LAST NAME	ROCHA	
CONSUMER RESIDENCE ADDRESS 1	6310 SW 41ST ST	
CONSUMER RESIDENCE ADDRESS 2		
CONSUMER RESIDENCE CITY	DAVIE	
CONSUMER STATE	FL	
CONSUMER ZIP CODE	333140000	
CONSUMER SSN OR SIN		

Citi® Platinum Select® Card

citi

JACQUELINE M ROCHA

Member Since 2012 Account number ending in:

Billing Period: 08/19/14-09/16/14

How to reach us
www.citibank.com

1-800-925-8871

BOX 6500 SIOUX FALLS, SD 57117

Minimum payment due: **\$1,341.53**
New balance: **\$1,341.53**
Payment due date: **10/14/14**

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 \$35 and your APRs may be increased up to the variable 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)	\$1,342

For information about credit counseling services, call 1-877-337-6188.

Your account is past due. Please pay at least the minimum payment due, which includes a past due amount of \$380.07 and an overlimit amount of \$341.53.

Account Summary

Previous balance	\$1,286.53
Payments	-\$0.00
Credits	-\$0.00
Purchases	+\$30.00
Cash advances	+\$0.00
Fees	+\$25.00
Interest	+\$0.00
New balance	\$1,341.53

Credit Limit

Credit limit	\$1,000
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Includes \$300 cash advance limit

Please print **Address Changes** on the reverse side



Pay online www.citibank.com



Pay by phone 1-800-925-8871



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 **\$1,341.53**
New balance **\$1,341.53**
Payment due date **10/14/14**

Amount enclosed:

Account number ending in

000000 MC 32 A 0

JACQUELINE M ROCHA
6310 SW 41ST ST
DAVIE FL 33314-3522

CITI CARDS
PO BOX 9001037
Louisville, KY 40290-1037

Account Summary

Trans. date	Post date	Description	Amount
Standard Purchases			
08/18	08/19	1081814 RETURN CHECK E -UTL	\$30.00

Fees charged

Date	Description	Amount
08/19	FEE FOR RETURNED CHECK	\$25.00
Total fees charged in this billing period		\$25.00

Interest charged

Total interest charged in this billing period	\$0.00
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2014 totals year-to-date

Total fees charged in 2014	\$260.00
Total interest charged in 2014	\$145.70

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	18.99% (V)	\$0.00 (D)	\$0.00
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) vary with the market based on the Prime Rate. Balances followed by (D) are determined by the daily balance method (including current transactions).

Account messages

You may pay all or part of your account balance at any time. However, you must pay, by the payment due date, at least the minimum payment due.

Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

Please be sure to pay on time. If you submit your payment by mail, we suggest you mail it no later than 10/07/2014 to allow for enough time for regular mail to reach us.

Citi® Platinum Select® Card

citi

JACQUELINE M ROCHA

Member Since 2012 Account number ending in:
Billing Period: 11/19/13-12/17/13How to reach us
www.citicards.com
1-800-950-5114

BOX 6500 SIOUX FALLS, SD 57117

Minimum payment due: \$77.20
New balance: \$1,050.83
Payment due date: 01/14/14

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 \$35 and your APRs may be increased up to the variable 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	7 year(s)	\$1,846

For information about credit counseling services, call 1-877-337-6167.

You are over your credit limit. Please pay at least the minimum payment due, which includes an overlimit amount of \$50.83.

Account Summary

Previous balance	\$991.72
Payments	-\$51.70
Credits	-\$0.00
Purchases	+\$59.44
Cash advances	+\$0.00
Fees	+\$35.00
Interest	+\$16.37
New balance	\$1,050.83

Credit Limit

Credit limit	\$1,000
Includes \$300 cash advance limit	

Citi EasyDeals 

Point Balance As of 12/01/2013

1,345

» See page 3 for more information about your rewards.

Please print **Address Changes** on the reverse side

 **Pay online** www.citicards.com

 **Pay by phone** 1-800-950-5114

 **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 \$77.20
New balance \$1,050.83
Payment due date 01/14/14

Amount enclosed:

Account number ending in

000000 MC 20 A 0

JACQUELINE M ROCHA
 6310 SW 41ST ST
 DAVIE FL 33314-3522

CITI CARDS
 PO BOX 9001037
 Louisville, KY 40290-1037

Account Summary

Trans. date	Post date	Description	Amount
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Payments, Credits and Adjustments

12/13		PAYMENT THANK YOU	-\$51.70
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Standard Purchases

11/14	11/19	1111413 RETURN CHECK C -Stop Payment	\$59.44
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Fees charged

Date	Description	Amount
11/19	RETURN CHECK FEE - 111413	\$35.00

Total fees charged in this billing period **\$35.00**

Interest charged

Date	Description	Amount
12/17	INTEREST CHARGED TO STANDARD PURCH	\$16.37

Total interest charged in this billing period **\$16.37**

2013 totals year-to-date

Total fees charged in 2013	\$134.52
Total interest charged in 2013	\$127.95

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	18.99% (V)	\$1,085.19 (D)	\$16.37
ADVANCES			
Standard Adv	25.24% (V)	\$0.00 (D)	\$0.00

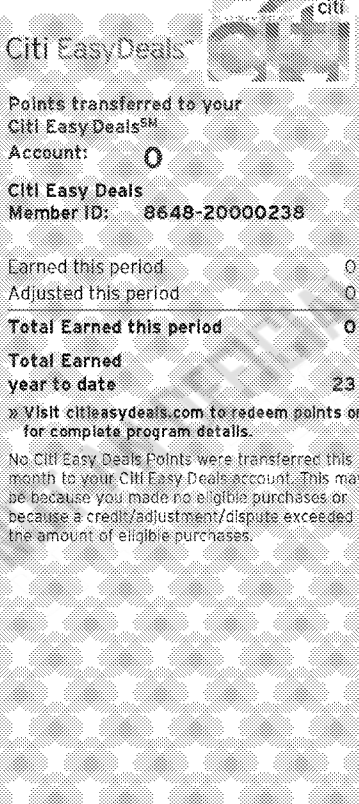
Your Annual Percentage Rate (APR) is the annual interest rate on your account. APRs followed by (V) vary with the market based on the Prime Rate. Balances followed by (D) are determined by the daily balance method (including current transactions).

Account messages

You may pay all or part of your account balance at any time. However, you must pay, by the payment due date, at least the minimum payment due.

Your account balance is over the credit line. Please pay the Minimum Payment Due shown before using your card again. If you have already sent us this payment, thank you.

Please be sure to pay on time. If you submit your payment by mail, we suggest you mail it no later than 01/07/2014 to allow for enough time for regular mail to reach us.



Citi EasyDeals™

Points transferred to your Citi EasyDealsSM Account: **0**

Citi Easy Deals
Member ID: **8648-20000238**

Earned this period: **0**
Adjusted this period: **0**

Total Earned this period **0**

Total Earned year to date **23**

» Visit citi-easydeals.com to redeem points or for complete program details.

No Citi Easy Deals Points were transferred this month to your Citi Easy Deals account. This may be because you made no eligible purchases or because a credit/adjustment/dispute exceeded the amount of eligible purchases.

Citi® Platinum Select® Card

citi

JACQUELINE M ROCHA

Member Since 2012 Account number ending in
Billing Period: 10/18/13-11/18/13How to reach us
www.citicards.com
1-800-950-5114

BOX 6500 SIOUX FALLS, SD 57117

Minimum payment due: \$26.20
New balance: \$991.72
Payment due date: 12/14/13

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 \$35 and your APRs may be increased up to the variable 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	7 year(s)	\$1,772
\$36	3 year(s)	\$1,309 (Savings=\$463)

For information about credit counseling services, call 1-877-337-8187.

Account Summary

Previous balance	\$1,033.96
Payments	-\$59.44
Credits	-\$0.00
Purchases	+\$0.00
Cash advances	+\$0.00
Fees	+\$0.00
Interest	+\$17.20
New balance	\$991.72

Credit Limit

Credit limit	\$1,000
Includes \$300 cash advance limit	
Available credit	\$8
Includes \$8 available for cash advances	

Citi EasyDeals™



Point Balance As of 11/01/2013

1,345

» See page 3 for more information about your rewards.

Please print Address Changes on the reverse side

Pay online www.citicards.com

Pay by phone 1-800-950-5114

 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 \$26.20
New balance \$991.72
Payment due date 12/14/13

Amount enclosed:

Account number ending in

000000 MC 00 A 0

JACQUELINE M ROCHA
 6310 SW 41ST ST
 DAVIE FL 33314-3522

CITI CARDS
 PO BOX 9001037
 Louisville, KY 40290-1037

Account Summary

Trans. date	Post date	Description	Amount
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Payments, Credits and Adjustments

11/14		PAYMENT THANK YOU	-\$59.44
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Fees charged

Total fees charged in this billing period	\$0.00
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Interest charged

Date	Description	Amount
11/18	INTEREST CHARGED TO STANDARD PURCH	\$17.20

Total interest charged in this billing period	\$17.20
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2013 totals year-to-date

Total fees charged in 2013	\$99.52
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Total interest charged in 2013	\$111.58
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Interest charge calculation

Days in billing cycle: 32

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	18.99% (V)	\$1,033.04 (D)	\$17.20
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) vary with the market based on the Prime Rate. Balances followed by (D) are determined by the daily balance method (including current transactions).

Account messages

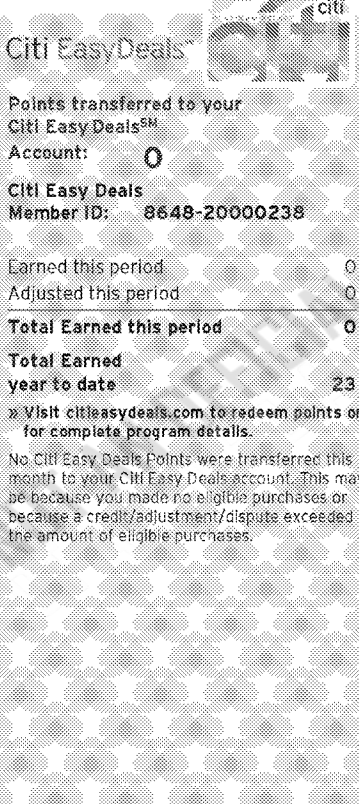
You have authorized us to electronically debit your monthly payments from your bank account on the terms designated by you until the payment authorization expires or is revoked by you.

The next payment will be debited from the bank account specified by you on the date shown below. The amount debited from your bank account will be the payment amount designated below or, if less, the balance due on your account on the payment date. You may cancel or make changes to your scheduled payment or revoke the recurring payment authorization at any time by calling us no later than 8:00 p.m. Central Time on the day preceding the scheduled payment.

Payment Date: 12/14/2013 ; Confirmation Number: 211223363540059 ;
Payment Amount: \$26.20

You may pay all or part of your account balance at any time. However, you must pay, by the payment due date, at least the minimum payment due.

Please be sure to pay on time. If you submit your payment by mail, we suggest you mail it no later than 12/07/2013 to allow for enough time for regular mail to reach us.



Citi EasyDeals™

Points transferred to your Citi EasyDealsSM Account: **0**

Citi Easy Deals
Member ID: **8648-20000238**

Earned this period	0
Adjusted this period	0
Total Earned this period	0
Total Earned year to date	23

» Visit citi-easydeals.com to redeem points or for complete program details.

No Citi Easy Deals Points were transferred this month to your Citi Easy Deals account. This may be because you made no eligible purchases or because a credit/adjustment/dispute exceeded the amount of eligible purchases.

Citi® Platinum Select® Card

citi

JACQUELINE M ROCHA

Member Since 2012 Account number ending in:

Billing Period: 09/19/13-10/17/13

How to reach us
www.citicards.com

1-800-950-5114

BOX 6500 SIOUX FALLS, SD 57117

Minimum payment due: **\$59.44**
 New balance: **\$1,033.96**
 Payment due date: **11/14/13**

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 \$35 and your APRs may be increased up to the variable 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	7 year(s)	\$1,830

For information about credit counseling services, call 1-877-337-6167.

You are over your credit limit. Please pay at least the minimum payment due, which includes an overlimit amount of \$33.96.

Account Summary

Previous balance	\$958.34
Payments	-\$24.18
Credits	-\$0.00
Purchases	+\$84.32
Cash advances	+\$0.00
Fees	+\$0.00
Interest	+\$15.48
New balance	\$1,033.96

Credit Limit

Credit limit	\$1,000
Includes \$300 cash advance limit	

Citi EasyDeals 

Point Balance As of 10/01/2013

1,336

» See page 3 for more information about your rewards.

Please print **Address Changes** on the reverse side

 **Pay online** www.citicards.com

 **Pay by phone** 1-800-950-5114

 **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 **\$59.44**
 New balance **\$1,033.96**
 Payment due date **11/14/13**

Amount enclosed:

Account number ending in

000000 MC 20 A 0

JACQUELINE M ROCHA
 6310 SW 41ST ST
 DAVIE FL 33314-3522

CITI CARDS
 PO BOX 9001037
 Louisville, KY 40290-1037

Account Summary

Trans. date	Post date	Description	Amount
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Payments, Credits and Adjustments

10/14		PAYMENT THANK YOU	-\$24.18
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Standard Purchases

09/20	09/20	THE FRESH MARKET - FORT LAUDERDA FL	\$7.48
09/20	09/20	RACETRAC566 00005660 DAVIE FL	\$15.00
09/20	09/20	RACETRAC566 00005660 DAVIE FL	\$15.23
10/01	10/01	RACETRAC566 00005660 DAVIE FL	\$46.61

Fees charged

Total fees charged in this billing period	\$0.00
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Interest charged

Date	Description	Amount
10/17	INTEREST CHARGED TO STANDARD PURCH	\$15.48

Total interest charged in this billing period	\$15.48
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2013 totals year-to-date

Total fees charged in 2013	\$99.52
Total interest charged in 2013	\$94.38

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	18.99% (V)	\$1,026.12 (D)	\$15.48
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) vary with the market based on the Prime Rate. Balances followed by (D) are determined by the daily balance method (including current transactions).

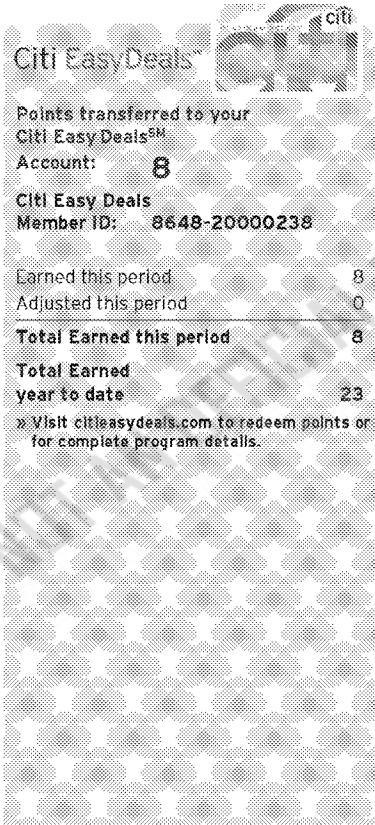
Account messages

You may pay all or part of your account balance at any time. However, you must pay, by the payment due date, at least the minimum payment due.

For customers who qualify for benefits for the same transaction under Citi Price Rewind, Internet Price Protection and Price Protection coverages, or any combination of those coverages, the Company will only pay under the coverage providing the highest benefit and no benefits will be due under the other coverages.

Your account balance is over the credit line. Please pay the Minimum Payment Due shown before using your card again. If you have already sent us this payment, thank you.

Please be sure to pay on time. If you submit your payment by mail, we suggest you mail it no later than 11/07/2013 to allow for enough time for regular mail to reach us.



Citi EasyDeals™

Points transferred to your Citi EasyDealsSM

Account: **8**

Citi Easy Deals
Member ID: **8648-20000238**

Earned this period: **8**

Adjusted this period: **0**

Total Earned this period: 8

Total Earned year to date: 23

» Visit citi.easydeals.com to redeem points or for complete program details.