

**FILED**  
FEB 04 2019 *shc*  
ALISON H. SONNTAG  
KITSAP COUNTY CLERK

**CASE TYPE 2**  
**KITSAP COUNTY SUPERIOR COURT**  
CASE INFORMATION COVER SHEET

Case Title: PORTFOLIO RECOVERY ASSOCIATES v HOUSTON C WADE  
Attorney Name: Ashley B. Bittner

Case Number: 19.2.00412.18  
Bar Membership Number: 48371

Please check one category that best describes this case for indexing purposes. Accurate case indexing not only saves time in docketing new cases, but helps in forecasting needed judicial resources. Cause of action definitions are listed on the back of this form. Thank you for your cooperation.

**APPEAL/REVIEW**

- Administrative Law Review (ALR 2)
- Appeal of Department of Licensing Revocation (DOL 2)
- Civil, Non-Traffic (LCA 2)
- Civil, Traffic (LCI 2)

**CONTRACT/COMMERCIAL**

- Breach of Contract (COM 2)
- Commercial Contract (COM 2)
- Commercial Non-Contract (COL 2)
- Third Party Collection (COL 2)

**MERETRICIOUS RELATIONSHIP**

- Meretricious Relationship (MER 2)

**DOMESTIC VIOLENCE/ANTIHARASSMENT**

- Civil Harassment (HAR 2)
- Domestic Violence (DVP 2)
- Foreign Protection Order (FPO 2)
- Sexual Assault Protection (SXP 2)
- Vulnerable Adult Protection (VAP 2)

**JUDGMENT**

- Abstract Only (ABJ 2)
- Foreign Judgment (FJU 2)
- Judgment, Another County (ABJ 2)
- Judgment, Another State (FJU 2)
- Tax Warrant (TAX 2)
- Transcript of Judgment (TRJ 2)

**OTHER COMPLAINT/PETITION**

- Action to Compel/Confirm Private Binding Arbitration (MSC2)
- Change of Name (CHN 2)
- Deposit of Surplus (MSC 2)
- Emancipation of Minor (EOM 2)
- Injunction (INJ 2)
- Interpleader (MSC 2)
- Malicious Harassment (MHA 2)
- Minor Settlement (No Guardianship) (MST 2)
- Petition for Civil Commitment (Sexual Predator) (PCC 2)
- Property Damage-Gangs (PRG 2)

- Seizure of Property from Commission of Crime (SPC 2)
- Seizure of Property Resulting from a Crime (SPR 2)
- Subpoenas (MSC 2)

**PROPERTY RIGHTS**

- Condemnation (CON 2)
- Foreclosure (FOR 2)
- Land Use Petition (LUP 2)
- Property Fairness (PFA 2)
- Quiet Title (QTI 2)
- Unlawful Detainer (UND 2)

**TORT, MEDICAL, MALPRACTICE**

- Hospital (MED 2)
- Medical Doctor (MED 2)
- Other Health Care Professional (MED 2)

**TORT, MOTOR VEHICLE**

- Death (TMV 2)
- Non-Death Injuries (TMV 2)
- Property Damage Only (TMV 2)
- Victims of Motor Vehicle Theft (VVT 2)

**TORT, NON-MOTOR VEHICLE**

- Asbestos (PIN 2)
- Other Malpractice (MAL 2)
- Personal Injury (PIN 2)
- Products Liability (TTO 2)
- Property Damage (PRP 2)
- Wrongful Death (WDE 2)

**WRIT**

- Habeas Corpus (WHC 2)
- Mandamus (WRM 2)
- Restitution (WRR 2)
- Review (WRV 2)
- Miscellaneous Writs (VMW 2)

IF YOU CANNOT DETERMINE THE APPROPRIATE CATEGORY, PLEASE DESCRIBE THE CAUSE OF ACTION BELOW.

*B2HO-  
POI.*

19-2-00412-18  
CICS 1  
Case Information Cover Sheet  
4898861



SUPERIOR COURT OF WASHINGTON  
COUNTY OF KITSAP

PORTFOLIO RECOVERY ASSOCIATES LLC  
Petitioner/Plaintiff

Honorable JENNIFER A. FORBES

Court Reporter BARBARA BRACE

Court Clerk JENNIFER KNAPP

Date SEPTEMBER 20, 2019

HOUSTON WADE

Respondent/Defendant

No. 19-2-00412-18

Pet/Pla appeared NO through/with Counsel C. MERCADO  
Pet/Pla appeared \_\_\_\_\_ through/with Counsel \_\_\_\_\_  
Resp/Def appeared yes through/with Counsel PRO SE  
Resp/Def appeared \_\_\_\_\_ through/with Counsel \_\_\_\_\_  
Guardian-Ad Litem appeared \_\_\_\_\_ State / Other appeared \_\_\_\_\_

THE MATTER BEFORE THE COURT [ ] Show Cause re: \_\_\_\_\_

Motion for default ~~to compel~~ / \_\_\_\_\_

[ ] Unlawful Detainer [ ] Minor Settlement [ ] Summary Judgment [ ] Supplemental Exam  
[ ] Entry of Order [ ] Status/Review [ ] Settlement on the Record

Testimony taken: \_\_\_\_\_

Mr. Wade argues was never properly served. Docs sent to an old address from 17 years ago. He sent a response after received docs from current resident @ old address. Denies any accounts w/ Plaintiff.

Mr. Mercado - no objection to 2 week continuance, will remove matter for hearing if necessary.

\* Court grants ~~continuance~~ directs Mr. Wade to file his response. directs Mr. Wade to provide his current contact info to Mr. Mercado today. Denies default without prejudice. No order signed or to be presented.

[ ] Courtroom polled for \_\_\_\_\_ [ ] No response Time \_\_\_\_\_

[ ] Default Granted [ ] Writ Granted [ ] Judgment Approved


The Court grants/denies motion. without prejudice [ ] The Court takes the matter under advisement.

[ ] Order signed as presented. [ ] Order to be presented.

[ ] This matter stricken/continued. [ ] Court Scheduler advised

[ ] Court sets \_\_\_\_\_ hearing at \_\_\_\_\_ am/pm on \_\_\_\_\_

[ ] Pleadings/File taken from this hearing by \_\_\_\_\_

19-2-00412-18  
MTHRG 8  
Motion Hearing  
6614482  


**FILED**  
FEB 04 2019 *AKC*  
ALISON H. SONNTAG  
KITSAP COUNTY CLERK

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON IN AND FOR THE  
COUNTY OF KITSAP

PORTFOLIO RECOVERY ASSOCIATES LLC,  
Plaintiff,

vs.

HOUSTON C WADE,  
Defendants.

NO. 19.2.00412.18  
SUMMONS (20 DAYS)

**THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED  
WILL BE USED FOR THAT PURPOSE**

TO THE DEFENDANTS: A lawsuit has been started against you in the above-entitled Court by PORTFOLIO RECOVERY ASSOCIATES LLC, Plaintiff. The Plaintiff's claim is stated in written Complaint, a copy of which is served upon you with this Summons.

In order to defend against this lawsuit, you must respond to the Complaint by stating your defense in writing, and serve a copy upon the undersigned attorney for the Plaintiff within 20 days (if service is made on you within the State of Washington), or within 60 days (if service is made on you outside the State of Washington) after the service of this Summons, excluding the day of service, or a Default Judgment may be entered against you without notice.

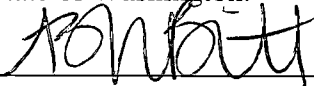
A Default Judgment is one where the Plaintiff is entitled to what it asks because you have not responded. If you serve a Notice of Appearance on the undersigned attorney, you are entitled to notice before a Default Judgment may be entered.



If not previously filed, you may demand that the Plaintiff file this lawsuit with the Court. If you do so, your demand must be in writing and must be served upon the undersigned person. Within 14 days after you serve your demand, the Plaintiff must file this lawsuit with the Court, or the service on you of this Summons and Complaint will be void.

If you wish to seek the advice of an attorney in this matter, you should do so promptly so that your written response, if any, may be served on time. This Summons is issued pursuant to Rule 4 of the Superior Court Civil Rules of the State of Washington.

Dated: September 4, 2018



- Roger E. Rahlfs WSBA# 6035
  - Christopher J. Mercado WSBA# 38333
  - Ashley B. Bittner WSBA# 48371
  - Kent W. Bailey WSBA# 47727
  - Randall D. Johannes WSBA# 44464
- Attorney for Plaintiff  
Our File No.: 50801562

**NOTICE:** State and federal law provide protections to defendants who are in the military service, and to their dependents. Dependents of a service member are the service member's spouse, the service member's minor child, or an individual for whom the service member provided more than one-half of the individual's support for one hundred eighty days immediately preceding an application for relief.

One protection provided is the protection against the entry of a default judgment in certain circumstances. This notice pertains only to a defendant who is a dependent of a member of the national guard or a military reserve component under a call to active service, or a national guard member under a call to active service, or a national guard member under a call to service authorized by the governor of the state of Washington, for a period of more than thirty consecutive days. Other defendants in military service also have protections against default judgments not covered by this notice. If you are the dependent of a member of the national guard or a military reserve component under a call to active service, or a national guard member under a call to service authorized by the governor of the state of Washington, for a period of more than thirty consecutive days, you should notify the plaintiff or the plaintiff's attorneys in writing of your status as such within twenty days of the receipt of this notice. If you fail to do so, then a court or an administrative tribunal may presume that you are not a dependent of an active duty member of the national guard or reserves, or a national guard member under a call to service authorized by the governor of the state of Washington, and proceed with the entry of an order of default and/or default judgment without further proof of your status. Your response to the plaintiff or plaintiff's attorneys about your status does not constitute an appearance for jurisdictional purposes in any pending litigation nor a waiver of your rights.

This notice is issued pursuant to RCW 38.42.050 (3)(a), effective June 7, 2006 and amended June 7, 2012.

**FILED**

**FEB 04 2019**

**ALISON H. SONNTAG  
KITSAP COUNTY CLERK**

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON IN AND FOR THE  
COUNTY OF KITSAP

PORTFOLIO RECOVERY ASSOCIATES LLC,  
Plaintiff,

vs.

HOUSTON C WADE,  
Defendants.

NO. 19-2-00412-18

COMPLAINT FOR MONEY DUE  
ON CREDIT ACCOUNT

The Plaintiff, PORTFOLIO RECOVERY ASSOCIATES LLC, as purchaser or assignee of the Defendants' credit account with CIT ONLINE BANK, or any other assignee that may have or have had any interest in the Defendants' said credit account, or any interest in any obligation relating to such credit account, alleges:

1. The Plaintiff, PORTFOLIO RECOVERY ASSOCIATES LLC is duly qualified to bring this action.
2. That the Defendants named above reside or do business within the jurisdiction of this Court.
3. That the Defendants made purchases of goods or services on credit on an account with CIT ONLINE BANK (Plaintiff's Assignor).
4. That the Defendants made payments for the purchases made on credit on the account with Plaintiff's Assignor.
5. That Defendants are indebted to the Plaintiff for the balance owed on the account with Plaintiff's Assignor which they used for the purchase of goods and services on credit.
6. By using said account, the Defendants became bound to repay the account.
7. That although demand for payment has been made, payment has not been forthcoming, the Defendants are in default, and there is now due and owing the sum of \$6,088.45

as of December 9, 2016.

**ACCOUNT STATED CAUSE OF ACTION:**

8. As a result of services provided by the Plaintiff's Assignor at the Defendant's request, the Defendants established an account with the Plaintiff's Assignor.

9. The Plaintiff's Assignor sent statements to the Defendants which set forth the activity on this account and the balance owed.

10. The Defendants made payments on the account but they are now in default for failing to make those payments as they became due and owing.

11. The Plaintiff's Assignor accelerated the amounts due and owing on the account and the amount owing from the Defendant's is set forth in paragraph 7 above.

**UNJUST ENRICHMENT CAUSE OF ACTION:**

12. The Defendants have failed to pay for the products or services they requested and received from the Plaintiff's Assignor and as a result they have been unjustly enriched.

13. The amount of this unjust enrichment is as set forth in paragraph 7 which is the reasonable value of the services provided.

14. The Defendants, in equity, should be required to pay the Plaintiff the sum set forth in paragraph 7 above.

WHEREFORE, the Plaintiff prays for Judgment against the Defendants, HOUSTON C WADE, in the sum of \$6,088.45 and costs of this action, plus any other relief deemed equitable and just by the court.

Dated: September 4, 2018



Roger E. Rahlfs WSBA# 6035  
 Christopher J. Mercado WSBA# 38333  
 Ashley B. Bittner WSBA# 48371  
 Kent W. Bailey WSBA# 47727  
 Randall D. Johannes WSBA# 44464  
Attorney for Plaintiff  
Our File No.: 50801562

**This communication is from a debt collector and is an attempt to collect a debt;  
any information obtained will be used for that purpose.**

FILED

AUG 16 2019

KITSAP COUNTY CLERK  
ALISON H. SONNTAG

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON IN AND FOR THE  
COUNTY OF KITSAP

PORTFOLIO RECOVERY ASSOCIATES LLC,  
Plaintiff,  
vs.  
HOUSTON C WADE,  
Defendant.

NO. 19-2-00412-18

DECLARATION OF MAILING

The undersigned, under the penalty of perjury of the laws of the State of Washington, hereby certifies that on August 14, 2019, the documents set forth below were deposited in the United States mail, postage prepaid, by First class Mail and Certified Mail, Return Receipt Requested, Article # 7018 3090 0000 9731 2927, addressed as follows:

HOUSTON C WADE  
370 GROW AVE NW, APT B10  
BAINBRIDGE ISLAND WA 98110

Documents mailed:

Notice for Hearing; Motion for Order of Default and Judgment; Non Military Statement; Copy of Proof Of Service Of Summons and Complaint; Proposed Order Of Default and Judgment, and Declaration Of Mailing.



Ashley B. Bittner WSBA# 48371  
 Christopher J. Mercado WSBA# 38333  
 Kent W. Bailey WSBA# 47727  
 Mark S. Cullen WSBA# 54710  
 Randall D. Johannes WSBA# 44464  
Attorney for Plaintiff  
Our File No.: 50801562



FILED

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KITSAP COUNTY CLERK  
ALISON H. SONNTAG

IN THE SUPERIOR COURT OF THE STATE OF  
WASHINGTON IN AND FOR KITSAP COUNTY

PORTFOLIO RECOVERY ASSOCIATES LLC

Case No.:

19-2-00412-18

DECLARATION OF SERVICE

vs.

SUMMONS AND COMPLAINT FOR MONEY DUE ON  
CREDIT ACCOUNT

HOUSTON C WADE

The undersigned, Hereby declares: That he/she is now and at all times herein mentioned was a citizen of the United States and resident of the State of Washington, over the age of 18 years, not a party to or interested in the above mentioned action and competent to be a witness therein.

That on 14th day of September, 2018 at 01:13 PM at the address of 370 GROW AVE NW, APT B10, BAINBRIDGE ISLAND, WA 98110, declarant duly served the above described documents in the above-entitled matter upon HOUSTON C WADE, by then and there, personally delivering at the residence and usual place of abode of said person(s), two true and correct copies thereof to and leaving same with Abigail Wade CO-RESIDENT who is a person of suitable age and discretion then resident therein.

9/14/2018 1:13 PM:

I hereby declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

SIGNED AT Port Orchard WASHINGTON

9-25-18

Service Fee: \$70.00

Description of the person served: Female;  
White, Brown hair, Approx. Age: 58 years,  
Approx. Height: 5 ft 4 in., Approx. Weight: 170  
lbs. Other Features: Glasses

X  
STAR FIVE PRO SERVE (DANIEL STARKWEATHER)

Process Server #: 9411220098

512 SW Barry Lake Rd, #30

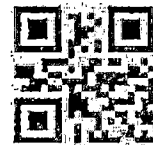
Port Orchard, WA, 98367

(360) 621-9295

Atty File#: 50801562

Job ID#: 2934031

Invoice#: 2804918



2934031

19-2-00412-18

AFSR 3

Affidavit Declaration Certificate Confirmation of  
6356388





IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON IN AND FOR THE  
COUNTY OF KITSAP

PORTFOLIO RECOVERY ASSOCIATES LLC,  
Plaintiff,  
vs.  
HOUSTON C WADE,  
Defendant.

NO. 19-2-00412-18

GR 17 DECLARATION

Name of Document: Declaration of Service

The undersigned, under the penalty of the laws of the State of Washington, states as follows:

I have examined the Document to which this declaration is attached and it consists of 2 pages  
(including this declaration page). It is a complete and legible copy of the Document I have  
received for filing with the court.

Signed on the 14<sup>th</sup> day of August, 2019.



Ashley B. Bittner WSBA# 48371  
 Christopher J. Mercado WSBA# 38333  
 Kent W. Bailey WSBA# 47727  
 Mark S. Cullen WSBA# 54710  
 Randall D. Johannes WSBA# 44464  
Attorney for Plaintiff  
Our File No.: 50801562

FILED

AUG 16 2019

KITSAP COUNTY CLERK  
ALISON H. SONNTAG

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON IN AND FOR THE  
COUNTY OF KITSAP

PORTFOLIO RECOVERY ASSOCIATES LLC,  
Plaintiff,  
vs.  
HOUSTON C WADE,  
Defendant,

NO. 19-2-00412-18

NOTICE FOR MOTION DOCKET

(Clerk's Action Required)

TO: THE CLERK OF THE COURT  
AND TO: HOUSTON C WADE, Defendant.

PLEASE TAKE NOTICE that an issue of law in this case will be heard on the date below  
and the Clerk is directed to note this issue on the Civil Motion Calendar.

NATURE OF MOTION: Motion for Default and Judgment  
DATE and TIME: Friday, September 20, 2019 @ 9:00 a.m.  
PLACE: KITSAP COUNTY SUPERIOR COURT  
JUDGE: Judge/Court Commissioner

Dated: August 14, 2019.



Ashley B. Bittner WSBA# 48371  
 Christopher J. Mercado WSBA# 38333  
 Kent W. Bailey WSBA# 47727  
 Mark S. Cullen WSBA# 54710  
 Randall D. Johannes WSBA# 44464  
Attorney for Plaintiff  
Our File No.: 50801562



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KITSAP COUNTY CLERK  
ALISON H. SONNTAG

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON IN AND FOR THE  
COUNTY OF KITSAP

PORTFOLIO RECOVERY ASSOCIATES LLC,

Plaintiff,

vs.

HOUSTON C WADE,

Defendant.

NO. 19-2-00412-18

NON MILITARY STATEMENT

DEPT OF DEFENSE PRINTOUT

The statement from the Department of Defense web site confirming the Defendant's non-military status is attached.





**Status Report  
Pursuant to Servicemembers Civil Relief Act**

SSN: XXX-XX-9247  
 Birth Date: May-XX-1981  
 Last Name: WADE  
 First Name: HOUSTON  
 Middle Name: C  
 Status As Of: Aug-12-2019  
 Certificate ID: GFTF23HQZ7DXBRK

On Active Duty On Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects the individuals active duty status based on the Active Duty Status Date			

Left Active Duty Within 367 Days of Active Duty Status Date			
Active Duty Start Date	Active Duty End Date	Status	Service Component
NA	NA	No	NA
This response reflects where the individual left active duty status within 367 days preceding the Active Duty Status Date			

The Member or His/Her Unit Was Notified of a Future Call-Up to Active Duty on Active Duty Status Date			
Order Notification Start Date	Order Notification End Date	Status	Service Component
NA	NA	No	NA
This response reflects whether the individual or his/her unit has received early notification to report for active duty			

Upon searching the data banks of the Department of Defense Manpower Data Center, based on the information that you provided, the above is the status of the individual on the active duty status date as to all branches of the Uniformed Services (Army, Navy, Marine Corps, Air Force, NOAA, Public Health, and Coast Guard). This status includes information on a Servicemember or his/her unit receiving notification of future orders to report for Active Duty.

Michael V. Sorrento, Director  
 Department of Defense - Manpower Data Center  
 400 Gigling Rd.  
 Seaside, CA 93955

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ALISON H. SONNTAG

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON IN AND FOR THE  
COUNTY OF KITSAP

PORTFOLIO RECOVERY ASSOCIATES LLC,  
Plaintiff,  
vs.  
HOUSTON C WADE,  
Defendant.

NO. 19-2-00412-18

MOTION FOR ORDER OF  
DEFAULT AND JUDGMENT  
and  
DECLARATION OF DEFAULT,  
AMOUNT DUE, AND MILITARY  
MEMBERSHIP PER SHB 2173  
AND RCWA

RELIEF REQUESTED

The Plaintiff moves the Court for an Order declaring that the Defendant, HOUSTON C WADE, be in default herein and an order granting judgment against the Defendant in the amount of \$6,398.45, which amount is made up of \$6,088.45 plus court costs of \$310.00 and attorney fees are not requested.

STATEMENT OF FACTS

The basis for venue, pursuant to CR 55(a) 4; is the fact that the Defendant resides or does business within the jurisdiction of this Court. That service of the Summons and Complaint was accomplished. The Affidavit of Service is on file herein, or attached, or both. Since the date of service Defendant has appeared. That appearance was in the form of a written dispute from the Defendant. (See attached). A validation of the debt was provided to the Defendant by way of letter dated 11/05/2018, including the Billing Statements, Terms and Conditions and Bill of Sale. (See attached). The Defendant needs to now file an Answer in the Court file and serve a copy of that filed pleading upon the undersigned. Notice of this Motion is sent to the Defendant. The Defendant has not filed an Answer or other pleading in this action, and more than 20 days have elapsed since the date of service. If no answer or pleading is filed, a default against said Defendant should now be



entered pursuant to Rule 4 of the Superior Court Rules. Verification of the amount owed is set forth in the below Declaration.

STATEMENT OF ISSUES

Is the Plaintiff entitled to entry of an Order of Default?

EVIDENCE RELIED UPON

The records and files herein, including the Affidavit of Service.

AUTHORITY

Civil Rule 55.

PROPOSED ORDER

A proposed Order accompanies the working copy of this Motion.

Dated: August 14, 2019.



- 
- Christopher J. Mercado WSBA# 38333
  - Ashley B. Bittner WSBA# 48371
  - Kent W. Bailey WSBA# 47727
  - Mark S. Cullen WSBA# 54710
  - Randall D. Johannes WSBA# 44464
- Attorney for Plaintiff  
Our File No.: 50801562

DECLARATION

The undersigned, with personal knowledge, and under the penalty of perjury under the laws of the State of Washington declares:

That I am the attorney for the Plaintiff and would incorporate the above statements set forth in the Motion herein as true and correct.

Attached hereto or filed herein is an Affidavit or Declaration which establishes the total balance owing to the Plaintiff by the Defendant of \$6,088.45.

A copy of the Affidavit of Service is attached in the amount of \$70.00 for the process fee requested plus a \$240.00 filing fee.

Attached hereto is a copy of the charge off statement establishing the balance on the account.

No attorney's fees are requested.

DECLARATION RE: MILITARY MEMBERSHIP

To the best of my knowledge, after investigation, the Defendant is neither an active military service member nor a dependent of such. I, or my staff, have gone to the Department of Defense web site and have searched for all Defendants' names and social security numbers. The report we have received confirms that the Defendant is not an active military service member. Through investigation, research and attempted contacts at addresses and phone numbers, I believe the Defendant is not a dependant of, nor a member of, the military service.

Dated: August 14, 2019.



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Christopher J. Mercado WSBA# 38333  
 Ashley B. Bittner WSBA# 48371  
 Kent W. Bailey WSBA# 47727  
 Mark S. Cullen WSBA# 54710  
 Randall D. Johannes WSBA# 44464  
Attorney for Plaintiff  
Our File No.: 50801562

You are not required to complete this form, nor is this form part of a legal pleading. The information you provide below helps our office better understand your ability and willingness to pay your debt. If you elect to complete this form, you are acting solely on a voluntary basis in an attempt to make an offer to pay the balance owed to our client.

**EZ FORM TO MAIL OR FAX TO US**

Mail or fax this form to:  
**MACHOL & JOHANNES, LLC**  
700 17th Street, Suite 200  
Denver, CO 80202

FAX NUMBER 303/830-0047 OR TOLL FREE FAX NUMBER 866/857-7527

From: Name: Houston Wade File Number: 50801562  
Address: 13355 Madison Ave NE  
City, State, & Zip: Bainbridge Island, WA 98110  
Day Phone: \_\_\_\_\_ Evening Phone: \_\_\_\_\_  
Email Address: houstonwade@gmail.com

All offers are subject to review.

I am willing to set up payment arrangements and propose to pay \$ \_\_\_\_\_ per month, starting on \_\_\_\_\_ (date). The best payment due date of the month is the \_\_\_\_\_ (for example: 5th, 10th, 15th, 20th or 25th).

I receive exempt funds in the form of \_\_\_\_\_ (Please provide documented proof with this form, if available.)

I am willing to discuss this account with you. Please call me at (805) 989-2401.  
The best time to call is anytime. *I don't have any accounts with "Cit online Bank"*

Payments may be made via: personal check, check by phone, debit card by phone, money order, or bank certified funds

This communication is an attempt to collect a debt by a debt collector. Any information obtained will be used for that purpose.

**E-Z ONLINE SOLUTIONS**

**MACHOL & JOHANNES, LLC**  
ATTORNEYS AT LAW

This communication is an attempt to collect a debt by a debt collector. Any information obtained will be used for that purpose.

[www.mjfirm.com](http://www.mjfirm.com)

Activate your account. In most cases, online at [www.mjfirm.com](http://www.mjfirm.com)

**SET UP A PAYMENT ARRANGEMENT** After logging in to your account, you can set up a payment arrangement by clicking the SET UP PAYMENT ARRANGEMENT button

**MAKE A PAYMENT** OR you can make a one-time payment by clicking the MAKE A PAYMENT button

**RESOLVE YOUR ACCOUNT ONLINE**



700 17th Street Suite 200  
Denver, CO 80202-3502

**MACHOL & JOHANNES** LLC  
ATTORNEYS AT LAW

Main 303.830.0075 • Fax 866.857.7527  
Toll Free 866.729.3328 • mjfirm.com

**Jacques Machol, III\*** **Randall Johannes\*\*** **Christopher J. Mercado†**

\*Licensed in CO \*\*Licensed in WA †Licensed in OR

HOUSTON C WADE  
370 GROW AVE NW, APT B10  
BAINBRIDGE ISLAND WA 98110

November 5, 2018

Re: Current Creditor: PORTFOLIO RECOVERY ASSOCIATES LLC  
Original Creditor (or Other Identifying Information): CIT ONLINE BANK  
Consumer(s): HOUSTON C WADE  
Original Account No: \*\*\*\*\*2955  
Other Identifying Information: CIT ONLINE BANK  
Our File No.: 50801562

Pursuant to your request for verification of the above-referenced debt, we provide the following information from our client:

Original Creditor: CIT ONLINE BANK  
Original Account No: \*\*\*\*\*1922955  
Contract Date: August 8, 2003  
Charge-off Date: July 17, 2017  
Last Pay Date: May 15, 2017  
Enclosed Documents: Billing Statements, Terms and Conditions and Bill of Sale

The current balance is \$6,088.45.

**MACHOL & JOHANNES, LLC**

Ashley B. Bittner, Attorney  
Washington Office  
2800 156th Avenue SE, Ste 105  
Bellevue WA 98007  
cval1.frm

**This communication is an attempt to collect a debt by a debt collector.  
Any information obtained will be used for that purpose.**

AFFIDAVIT

I, the undersigned, Ailia Trillo, 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 **CIT ONLINE BANK** and those records transferred to Account Assignee from **DELL FINANCIAL SERVICES, LLC** ("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 **08/25/2017**. 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 **HOUSTON C WADE** ("Debtor and Co-Debtor") to the Account Seller the sum of **\$6,088.45** with the respect to account number ending in **2955** as of the date of **07/17/2017** with there being no known un-credited 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 **\$6,088.45** 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

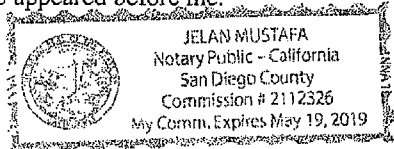
By: Ailia Trillo, Custodian of Records

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document, to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
County of San Diego

Subscribed and sworn to (or affirmed) before me on 0821 of 2018, by Ailia Trillo  
proved to me on the basis of satisfactory evidence to be the person who appeared before me.

Notary Public



This communication is from a debt collector and is an attempt to collect a debt.  
Any information obtained will be used for that purpose.

IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON IN AND FOR THE  
COUNTY OF KITSAP

PORTFOLIO RECOVERY ASSOCIATES LLC,  
Plaintiff,

vs.

HOUSTON C WADE,  
Defendant.

NO. 19-2-00412-18

GR 17 DECLARATION

Name of Document: Affidavit of Claim

The undersigned, under the penalty of the laws of the State of Washington, states as follows:

I have examined the Document to which this declaration is attached and it consists of 2 pages  
(including this declaration page). It is a complete and legible copy of the Document I have  
received for filing with the court.

Signed on the 14<sup>th</sup> day of August, 2019.



- Ashley B. Bittner WSBA# 48371  
 Christopher J. Mercado WSBA# 38333  
 Kent W. Bailey WSBA# 47727  
 Mark S. Cullen WSBA# 54710  
 Randall D. Johannes WSBA# 44464  
Attorney for Plaintiff  
Our File No.: 50801562



Offered by WebBank

Dell Preferred Account
Account Number 6879 4501 2901 1922 955
For the billing period ending July 10, 2017

Dell Financial Services™

Please see reverse side for Important account information and contact information.

Special Messages for HOUSTON C WADE

Your account is seriously past due. Please contact one of our account specialists today to work out a plan or learn if you qualify for a payment program at 1-800-283-2210. We have told a credit bureau about a late payment, missed payment or other default on your account. This information may be reflected in your credit report.

Summary of Account Activity table with columns for item and amount. Includes Previous Balance (\$5,911.63), Payments (\$0.00), Other Credits (\$0.00), Purchases (\$0.00), Other Debits (\$0.00), Fees Charged (\$37.00), Interest Charged (\$139.82), New Balance (\$6,088.45), Past Due Amount (\$1,116.00), Credit Limit (\$5,000.00), Available Credit (\$0.00), Statement Closing Date (July 10, 2017), Days in Billing Cycle (30).

Payment Information table with columns for item and amount. Includes New Balance (\$6,088.45), Minimum Payment Due\* (\$1,299.00), Payment Due Date (August 05, 2017), \*Includes Past Due Amount of \$1,116.00.

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 \$37.
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:

Table comparing payment options: Only the minimum payment (\$254.28), 35 Years (\$27,574.17); \$254.28, 3 Years (\$9,154.08 Savings = \$18,420.09).

If you would like more information about credit counseling services, call 1-800-283-2210 or go to http://www.justice.gov/ust/eo/bapcpa/ccde/cc\_approved.htm.

Contact Dell Financial Services Customer Service at 1-800-283-2210 or visit us online at www.dell.com/dfs.

Please send billing inquiries to Billing Inquiry Department: Dell Preferred Account, P.O. Box 81585, Austin, TX 78708-1585.

Please send correspondence other than billing inquiries to Dell Financial Services, c/o DFS Customer Care Dept., P.O. Box 81577, Austin, TX 78708-1577.

Please mail payments to the address on your payment coupon.

PLEASE NOTE: TO AVOID ADDITIONAL INTEREST CHARGES, PAY THE NEW BALANCE BY THE PAYMENT DUE DATE.

Transaction Detail

Transaction Detail table with columns: Reference Number, Trans Date, Post Date, Description of Transaction or Credit, Amount. Includes INTEREST CHARGE RATE CHANGED TODAY (0.00), Fees (LATE CHARGE ASSESSMENT 37.00, TOTAL FEES FOR THIS PERIOD 37.00), Interest Charged (BILLED INTEREST CHARGES ON PURCHASE 139.82, TOTAL INTEREST FOR THIS PERIOD 139.82).

2017 Totals Year-to-Date table: Total fees charged 2017 (\$259.00), Total interest charged 2017 (\$938.40).

Interest Charge Calculation

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

Interest Charge Calculation table with columns: Plan Type, Promotion Expiration Date, Balance Subject to Interest Rate, Daily Periodic Rate, Annual Percentage Rate (APR), Interest Charges, Promotion Plan Deferred Interest Charges, New Plan Balance, Deferred Interest Balance, Minimum Amount Due Per Plan. Includes REGULAR PLAN with APR of 28.74% (v).

Please fill in the 'Amount Enclosed' and return the payment coupon with your check in the enclosed return envelope. Do not staple, paper clip, fold or tape the contents.



Offered by WebBank

Want to pay now? Visit www.dell.com/dfs to make your payment online. Go paperless! Visit www.dell.com/GoPaperless to learn more.

Account #: 6879 4501 2901 1922 955
New Balance: \$6,088.45
Minimum Payment Due: \$1,299.00
Payment Due Date: August 05, 2017

Amount Enclosed: \$

New Address or Phone Number? Please visit us at www.dell.com/dfs or check box and complete reverse side.



HOUSTON C WADE
370 GROW AVENUE, N WEST, APT B-10
BAINBRIDGE ISLAND WA 98110-1752

Please make your check payable to: Dell Preferred Account. Include your 19 digit account number on your check or money order. Ensure the 'Amount Enclosed' written on the coupon equals the check amount.



DELL PREFERRED ACCOUNT
PAYMENT PROCESSING CENTER
P.O. BOX 6403
CAROL STREAM IL 60197-6403

CHARGE OFF STATEMENT

2955000060884500001830000012990006052017000020000



Offered by WebBank

Dell Preferred Account
Account Number 6879 4501 2901 1922 955
For the billing period ending June 10, 2017

Dell Financial Services™

Please see reverse side for important account information and contact information.

Special Messages for HOUSTON C WADE

Your account is seriously past due and quickly approaching charge-off status. Please contact one of our account specialists today to work out a plan or learn if you qualify for a payment program at 1-800-283-2210. We have told a credit bureau about a late payment, missed payment or other default on your account. This information may be reflected in your credit report.

Summary of Account Activity table with columns for item and amount. Includes Previous Balance, Payments, Other Credits, Purchases, Other Debits, Fees Charged, Interest Charged, New Balance, Past Due Amount, Credit Limit, Available Credit, Statement Closing Date, and Days in Billing Cycle.

Payment Information table with columns for item and amount. Includes New Balance, Minimum Payment Due, Payment Due Date, and Includes Past Due Amount of \$938.00.

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 \$37. 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:

Comparison table showing the impact of making only the minimum payment versus paying more. Columns include 'If you make no additional charges...', 'You will pay off the balance shown on this statement in about...', and 'And you will end up paying an estimated total of...'. Rows show 'Only the minimum payment' (34 years, \$26,703.81) and '\$246.89' (3 years, \$8,888.04 savings).

If you would like more information about credit counseling services, call 1-800-283-2210 or go to http://www.justice.gov/ust/eo/bapcpa/ccde/cc\_approved.htm.

Contact Dell Financial Services Customer Service at 1-800-283-2210 or visit us online at www.dell.com/dfs.

Please send billing inquiries to Billing Inquiry Department: Dell Preferred Account, P.O. Box 81585, Austin, TX 78708-1585.

Please send correspondence other than billing inquiries to Dell Financial Services, c/o DFS Customer Care Dept., P.O. Box 81577, Austin, TX 78708-1577.

Please mail payments to the address on your payment coupon.

PLEASE NOTE: TO AVOID ADDITIONAL INTEREST CHARGES, PAY THE NEW BALANCE BY THE PAYMENT DUE DATE.

Transaction Detail table with columns: Reference Number, Trans Date, Post Date, Description of Transaction or Credit, Amount. Includes Payment - THANK YOU!, Fees (LATE CHARGE ASSESSMENT, TOTAL FEES FOR THIS PERIOD), and Interest Charged (BILLED INTEREST CHARGES ON PURCHASE, TOTAL INTEREST FOR THIS PERIOD).

2017 Totals Year-to-Date table with columns: Item, Amount. Includes Total fees charged 2017 (\$222.00) and Total interest charged 2017 (\$798.58).

Interest Charge Calculation table with columns: Plan Type, Promotion Expiration Date, Balance Subject to Interest Rate, Daily Periodic Rate, Annual Percentage Rate (APR), Interest Charges, Promotion Plan Deferred Interest Charges, New Plan Balance, Deferred Interest Balance, Minimum Amount Due Per Plan. Includes a note: (v) = Variable Rate.

Please fill in the 'Amount Enclosed' and return the payment coupon with your check in the enclosed return envelope. Do not staple, paper clip, fold or tape the contents.



Offered by WebBank

Want to pay now? Visit www.dell.com/dfs to make your payment online. Go paperless! Visit www.dell.com/GoPaperless to learn more.

Account #: 6879 4501 2901 1922 955
New Balance: \$5,911.63
Minimum Payment Due: \$1,116.00
Payment Due Date: July 05, 2017

New Address or Phone Number? Please visit us at www.dell.com/dfs or check box and complete reverse side.

Amount Enclosed: \$

Please make your check payable to: Dell Preferred Account. Include your 19 digit account number on your check or money order. Ensure the 'Amount Enclosed' written on the coupon equals the check amount.



HOUSTON C WADE
370 GROW AVENUE, N WEST, APT B-10
BAINBRIDGE ISLAND WA 98110-1752



DELL PREFERRED ACCOUNT
PAYMENT PROCESSING CENTER
P.O. BOX 6403
CAROL STREAM IL 60197-6403

LAST PAYMENT STATEMENT

00059116300001780000011160007052017000020000



This BILL OF SALE is executed without recourse and without any representation or any warranty of collectability or otherwise, expressed or implied, except as provided in the Account Purchase Agreement.

EXECUTED this 25<sup>th</sup> day of August, 2017

SELLER:

DELL FINANCIAL SERVICES L.L.C.

By: 

Print

Name: Stephen J Sippel

Print

Title: VP Commercial Care and Collection

PURCHASER:

PORTFOLIO RECOVERY ASSOCIATES,  
LLC

By: 

Print

Name: Chris Graves

Print

Title: Authorized Signer

**EXHIBIT A-1**

**TO**

**BILL OF SALE**

The Purchased Accounts are the Charged-Off Accounts that are included in the electronic file named FY18 FFDS FCO Month 7.xls dated 08-02-2017 and incorporated herein by reference, which is defined in the Agreement as the Purchased Accounts File.

These Purchased Accounts were sold, assigned, transferred, delivered, and conveyed from WebBank ("Bank") to Dell Financial Services L.L.C. ("Seller") as described in the specific Bill of Sale dated 21<sup>st</sup> August 2017.



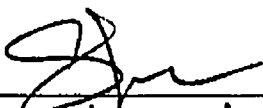
**BILL OF SALE**

FOR VALUE RECEIVED, and pursuant to the terms and conditions of the Account Purchase Agreement ("Account Purchase Agreement") among WebBank ("Bank"), Dell Revolver Company L.P. ("Revolver"), and Dell Financial Services L.L.C. ("DFS"), dated January 7, 2011, Bank does hereby sell, assign and convey to DFS as Designee for Revolver, its successors and assigns, as of the charge off date thereof, title and interest of Bank in and to those certain accounts described in Schedule 1 attached hereto and made a part hereof for all purposes. Terms used herein shall have the meanings set forth in the Account Purchase Agreement.

This BILL OF SALE is executed without recourse and without representation of any warranty of collectability or otherwise, expressed or implied, except as may be specifically provided in the Program Documents.

Dated this 4 day of August, 2017.

WEBBANK

By:   
Name: Steve Stanford  
Title: Controller

**Schedule 1**

to

**Bill of Sale dated August 21, 2017**

Accounts specifically identified in the following file: FreshCO\_FF August2017 sales WebBank.xlsx

is saved and encrypted on Box at the following path: Asset Transfers / 2017 / FY18 FFDS Month 7

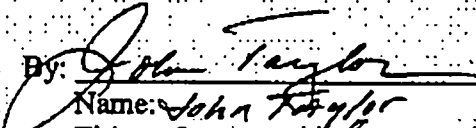
**BILL OF SALE**

KNOW ALL PERSONS BY THESE PRESENT that CIT BANK ("Transferor"), in consideration of the Account Transfer Agreement dated as of November 12 2009, between Transferor and WEBBANK (the "Transfer Agreement"), and other good and valuable consideration; the receipt and legal sufficiency of which are hereby acknowledged, does hereby grant, bargain, sell, transfer, assign and deliver, without recourse except as expressly set forth in the Transfer Agreement, to WEBBANK ("Transferee"); all right, title, and interest it holds in, all of the Accounts (capitalized terms used herein are as defined in the Transfer Agreement):

TO HAVE AND TO HOLD the same unto Transferee, its successors and permitted assigns, forever, Transferor does hereby covenant and agree that it will from time to time, as reasonably requested by Transferee, its successors and permitted assigns, do, execute, acknowledge and deliver to Transferee or its successors and permitted assigns, all further acts, transfers, conveyances, assignments, powers of attorney, and additional papers and instruments; and do or cause to be done all and any other acts or things as often as may be reasonably proper or necessary for better conveying, transferring and assigning all of the Accounts hereby conveyed, transferred and assigned, and to effectively carry out the intent hereof, and to vest in Transferee such title and interests as Transferor holds, free and clear of any lien created by Transferor; in and all of the said Accounts except for any interest of Dell Financial Services LLC and its affiliates.

IN WITNESS WHEREOF, Transferor, through its authorized officer, has caused this Bill of Sale to be executed in its name as of the 14th day of November, 2009.

TRANSFEROR

By:   
Name: John Taylor  
Title: President

**AFFIDAVIT OF SALE OF ACCOUNTS BY RESELLING CREDITOR**  
**(Dell Financial Services L.L.C.)**

State of Texas, County of Williamson.

Steve Snyder ("Affiant") being duly sworn, deposes and says:

I am over 18 and not a party to this action. I am the Senior Collections Manager of Dell Financial Services L.L.C. In that capacity, I am a custodian of certain books and records of Dell Financial Services L.L.C., and certain of its affiliates (altogether, "Debt Seller"), and am aware of the process of the sale and assignment of electronically stored business records.

Dell Financial Services L.L.C. owns certain accounts and, as servicer of the accounts, also maintains and records information in the ordinary course of business as they relate to such accounts. I am authorized to make the statements and representations set forth in this affidavit on behalf of Dell Financial Services L.L.C. The statements set forth herein are true and correct based on either personal knowledge or review of the business records of Dell Financial Services L.L.C.

As a custodian of records for Dell Financial Services L.L.C., my duties include having knowledge of, and access to, business records relating to the Accounts (as defined below). These records are kept by Dell Financial Services L.L.C. in the regular course of business. It was in the regular course of business for an employee or representative of Dell Financial Services L.L.C. with personal knowledge of the act, event, condition or opinion to make memorandum or records or to transmit information thereof to be included in such memorandum or records; and the records were made at or near the time of the act and/or event recorded or reasonably soon thereafter.

On 08/25/2017 Dell Financial Services L.L.C. sold a pool of charged-off accounts (the "Accounts") by a Purchase and Sale Agreement and a Bill of Sale to Portfolio Recovery Associates, LLC. Dell Financial Services L.L.C. acquired the Accounts from WebBank on the date of charge off of the Accounts. For those Accounts that were originated prior to November 14, 2009, CIT Bank (f/k/a CIT OnLine Bank) was the original creditor who sold such Accounts to WebBank on or about November 13, 2009. For those Accounts that were originated on or after November 14, 2009, WebBank was the original creditor. All Accounts charged off prior to November 14, 2009 were charged off by CIT Bank (f/k/a CIT OnLine Bank) and all Accounts charged off on or after November 14, 2009 were charged off by WebBank. Dell Financial Services L.L.C. was the servicer of the Accounts for both CIT Bank (f/k/a CIT OnLine Bank) and WebBank from the origination of the Accounts until 08/25/2017.

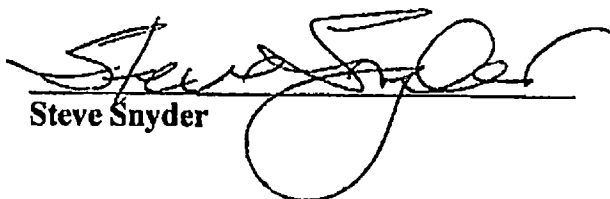
Pursuant to the sale, Seller sold, transferred, assigned, conveyed, granted, bargained, set over and delivered to Buyer and its successors and assigns, good and marketable title to the Accounts and any unpaid balance free and clear of any encumbrance, equity, lien, pledge, charge, claim or security interest. I am not aware of any errors in the Accounts.

In connection with the sale of the Accounts, electronic and other records were transferred to, or otherwise made available to the Buyer (the "Transferred Records"). The Transferred Records are


kept by Dell Financial Services L.L.C., as servicer of the accounts, in the regular course of business, and it was in the regular course of business of Dell Financial Services L.L.C. for an employee or representative with personal knowledge of the act, event, condition, or opinion recorded to make memorandum or records or to transmit information thereof to be included in such memorandum or records at or near the time of occurrence. To the extent that the Transferred Records include records that were prepared by a third party, they are records that were incorporated into the records of Dell Financial Services L.L.C. as a business records and the accuracy of such records are relied upon by Dell Financial Services L.L.C. in the regular course of business.

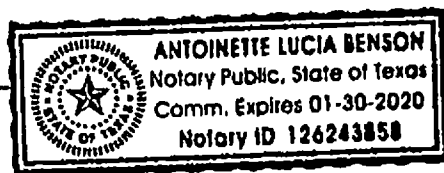
The above statements are true to the best of my knowledge.

Signed this 31st Day of August, 2017

  
Steve Snyder

Subscribed and sworn to before me this 31st day of August, 2017, by the above listed affiant, who is personally known to me or who produced evidence of an identification card or other document used to identify the affiant.

  
(Notary Stamp)




### CERTIFICATE OF CONFORMITY

STATE OF TEXAS  
CITY OF ROUND ROCK

The undersigned does hereby certify that he is an attorney at law duly admitted to practice in the State of Texas and is a resident of Austin in the State of Texas; that he is a person duly qualified to make this certificate of conformity pursuant to the laws of the State of Texas; that the foregoing acknowledgment by the Affiant named in the foregoing instrument taken before Antoinette Lucia Benson a notary in the State of Texas was taken in the manner prescribed by such laws of the State of Texas, being the State in which it was taken; and that it duly conforms with such laws and is in all respects valid and effective in such state.

August 31, 2017  
Date

  
Quanah Stewart  
Attorney at Law  
Licensed in the State of Texas

**AFFIDAVIT OF SALE OF ACCOUNTS BY ORIGINAL CREDITOR (WebBank)**

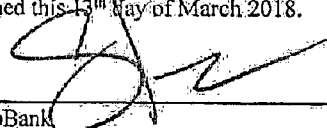
STATE OF UTAH  
COUNTY OF SALT LAKE

Steve Stanford, being duly sworn, deposes and says:

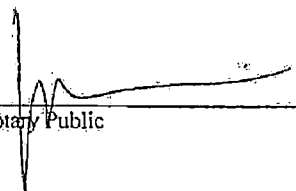
1. I am over 18 and not a party, nor employed by a party, to the sale of certain accounts by Dell Financial Services L.L.C. to Portfolio Recovery Associates, LLC. I am Controller of WebBank. In that capacity, I am aware of the process of the sale and assignment of electronically stored business records.
2. WebBank owned certain accounts and instructed its servicer, Dell Financial Services L.L.C., to maintain and record certain information in the records as they relate to such accounts. I am authorized to make the statements and representations set forth in this affidavit on behalf of WebBank. The statements set forth herein are true and correct based on either personal knowledge or review of the business records of WebBank.
3. My duties include having knowledge of, and access through WebBank's servicer, Dell Financial Services L.L.C., to certain business records relating to the Accounts (as defined below). These records are kept by WebBank's servicer, Dell Financial Services L.L.C., on behalf of WebBank in the regular course of business.
4. On or before August 21, 2017, WebBank ("Transferor") transferred (or caused to be transferred) or otherwise conveyed a pool of accounts, including certain charged-off accounts (the "Accounts") to Dell Financial Services L.L.C. ("Transferee"). Pursuant to the bill of sale, Transferor sold, transferred, assigned, conveyed, granted, bargained, set over and delivered to Transferee and its successors and permitted assigns, all right, title and interest the Transferor held in the Accounts free and clear of any lien created by Transferor, except for any interest of Transferee and its affiliates.
5. Dell Financial Services L.L.C. was the servicer of the Accounts from the origination of the Accounts through August 25, 2017. In its role as servicer of the Accounts, Dell Financial Services L.L.C. kept and maintained business records on behalf of WebBank in the regular course of business, and it was in the regular course of business of Dell Financial Services L.L.C. for an employee or representative with personal knowledge of the act, event, condition or opinion recorded to make memorandum or records or to transmit information thereof to be included in such memorandum or records at or near the time of occurrence.
6. The above statements are true to the best of my knowledge.

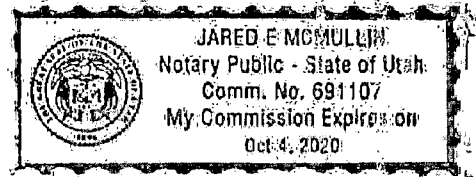
FURTHER AFFIANT SAYETH NOT.

Signed this 13<sup>th</sup> day of March 2018.

  
\_\_\_\_\_  
WebBank

Subscribed and sworn to before me this 13<sup>th</sup> day of March 2018, by Steve Stanford, an employee of WebBank.

  
\_\_\_\_\_  
Notary Public




**CERTIFICATE OF CONFORMITY**

STATE OF UTAH  
CITY OF SALT LAKE

I am a member of the Utah State Bar and licensed to practice law in the State of Utah. The form of the foregoing sworn statement and the form of the notary certificate each complies with the laws of the State of Utah, which is the state in which the statement is given, and if properly sworn and executed qualifies as a valid and effective affidavit in the State of Utah.

03/13/18  
Date

  
\_\_\_\_\_  
Attorney at law in the State of Utah

# Washington State Department of Revenue

[Services](#)   [Business Lookup](#)   **PORTFOLIO RECOVERY ASSOCIATES, LLC**

## License information:

[New search](#)   [Back to results](#)

**Entity name:** PORTFOLIO RECOVERY ASSOCIATES, LLC

**Business name:** PORTFOLIO RECOVERY ASSOCIATES, LLC

**Entity type:** Limited Liability Company

**UBI #:** 603-095-769

**Business ID:** 001

**Location ID:** 0017

**Location:** Active

**Location address:** 5425 ROBIN HOOD RD  
NORFOLK VA 23513-2441

**Mailing address:** 130 CORPORATE BLVD  
NORFOLK VA 23502-4952

**Excise tax and reseller permit status:** [Click here](#)

**Secretary of State status:** [Click here](#)

## Endorsements

Endorsements held at this location	License #	Count	Details	Status	Expiration date	First issuance
Out of State Collection Agency Branch - No Fee				Active	Jul-31-2020	Mar-12-2018

## Governing People *May include governing people not registered with Secretary of State*

Governing people	Title
GRAVES, CHRISTOPHER BARCLAY	
PRA GROUP, INC	
REES, TIMOTHY	

[View Additional Locations](#)

The Business Lookup information is updated nightly. Search date and time: 7/19/2019 1:54:56 PM

*Working together to fund Washington's future*

# BUSINESS LICENSE

IN THE SUPERIOR COURT OF THE STATE OF  
WASHINGTON IN AND FOR KITSAP COUNTY

PORTFOLIO RECOVERY ASSOCIATES LLC

Case No.:

19-2-00412-18

DECLARATION OF SERVICE

vs.

SUMMONS AND COMPLAINT FOR MONEY DUE ON  
CREDIT ACCOUNT

HOUSTON C WADE

The undersigned, Hereby declares: That he/she is now and at all times herein mentioned was a citizen of the United States and resident of the State of Washington, over the age of 18 years, not a party to or interested in the above mentioned action and competent to be a witness therein.

That on 14th day of September, 2018 at 01:13 PM at the address of 370 GROW AVE NW, APT B10, BAINBRIDGE ISLAND, WA 98110, declarant duly served the above described documents in the above-entitled matter upon HOUSTON C WADE, by then and there, personally delivering at the residence and usual place of abode of said person(s), two true and correct copies thereof to and leaving same with Abigail Wade CO-RESIDENT who is a person of suitable age and discretion then resident therein.

9/14/2018 1:13 PM:

I hereby declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

SIGNED AT Port Orchard WASHINGTON

9-25-18

Service Fee: \$70.00

Description of the person served: Female;  
White, Brown hair, Approx. Age: 58 years,  
Approx. Height: 5 ft 4 in., Approx. Weight: 170  
lbs. Other Features: Glasses

X

STAR FIVE PRO SERVE (DANIEL STARKWEATHER)

Process Server #: 9411220098

512 SW Berry Lake Rd. #30

Port Orchard, WA 98367

(360) 621-9295

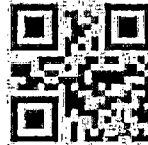
Atty File#: 50801562

Job ID#: 2934031

Invoice#: 2804918



2934031





1 Houston Wade  
13355 N Madison Ave NE  
2 Bainbridge Island, WA 98110  
808-989-2901  
3 houstonwade@gmail.com

FILED  
KITSAP COUNTY CLERK  
2019 OCT -1 PM 4:21  
ALISON H. SONNTAG

4 IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON

5 IN AND FOR THE COUNTY OF KITSAP

6 PORTFOLIO RECOVERY ASSOCIATES LLC,

Case No.: 19-2-00412-18

7 Plaintiff,

8 vs.

ANSWER

9 HOUSTON WADE,

10 Defendant

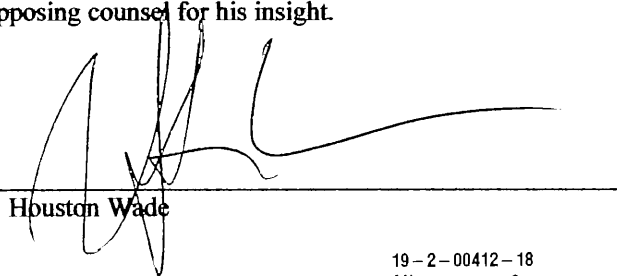
11 COMES NOW the Defendant Houston Wade in answering the allegations of the complaint on file.

12 My name is Houston Wade, and I do not owe the debt purchased by the Plaintiff. I have never had  
13 an account with either Cit Online Bank or with Dell Computers. The address used on the account is where I used to  
14 live 17 years ago, and apparently all the statements over the years and legal documents have been delivered to this  
15 address. When I received the unfiled summons last year from the current residents of my old home I responded to it  
16 notifying the Plaintiff that I had no such accounts. I thought this would be the end of it but was contacted by the  
17 residents of my old home two weeks ago that I had more mail. This mail turned out to be the notice of hearing for  
18 September 20<sup>th</sup>.

19 Inside was a collection of statements for purchases I have never made and none of the documents  
20 included a Promissory Note with my signature outlining the terms and conditions of whatever the loan or line of  
21 credit may have been.

22 After our hearing on September 20<sup>th</sup>, I spoke with the opposing counsel and he informed me that I  
23 should file a police report for stolen identity and that the case against me can then be dropped. I contacted the  
24 Bainbridge Island Police Department and filed a report No. I19-100059 and the officer of contact is Sergeant Ben  
25 Sias. I hope that this can be the end of it, and I thank the opposing counsel for his insight.

26 Dated this 30th of September 2019.

27  
28   
Houston Wade

ANSWER - 1

19-2-00412-18  
AN 9  
Answer  
6713617



**SUMMARY INCIDENT REPORT**

**REPORT NUMBER: I19-100059**

INCIDENT INFORMATION							
INCIDENT CODE 9.35.020	INCIDENT TYPE Identity Theft	INITIAL SUPP	<input checked="" type="checkbox"/>	DATE/TIME STARTED 09/12/2018 12:00 PM	DATE/TIME ENDED 09/22/2019 09:40 PM	DATE/TIME REPORTED 09/22/2019 09:47 PM	
REPORT FILED FROM ***	TRACKING NUMBER T19000063	LOCATION OF OCCURRENCE 370 Grow Avenue Northwest, B10, BAINBRIDGE			APPROVED BY: 901524/Kelly Eisenhood		
LOCATION TYPE Apartment	THEFT TYPE	METHOD OF ENTRY	METHOD OF EXIT	PT OF ENTRY	PT OF EXIT	ENTRY LOC	

PERSON LISTINGS											
1	TYPE VI	LAST NAME Wade	FIRST NAME Houston	MIDDLE NAME Curry	DOB ***	RACE ***	SEX *	DRIVER LIC NO ***	LIC ST ***		
	SSN	ETHNICITY	RESIDENT	EYE COLOR	HAIR COLOR	AGE	HEIGHT	WEIGHT	CELL PHONE ***		
	EMAIL houstonwade@gmail.com			RESIDENCE ADDRESS ***					HOME PHONE		
	EMPLOYER NAME			BUSINESS ADDRESS ***					WORK PHONE		

NARRATIVE
<p>Someone opened a line of credit in my name with "CIT Online Bank" several years ago and appears to have purchased thousands of dollars in computers from Dell, using my old address. I only recently found out about this when a collection company purchased the debt from CIT Online Bank and sued me for the back payments. I spoke with the lawyers for the collection company and they said I need to file a police report so they can drop their suit against me and I can get this ordeal removed from my credit report.</p>