IN THE COUNTY COURT IN AND FOR HILLSBOROUGH COUNTY, FLORIDA

CASE NO.:

JPMORGAN CHASE BANK, N.A.

Plaintiff,

vs.

COMPLAINT FOR DAMAGES

GHADA MAGHREBI

Defendant.

_____/

Plaintiff, JPMORGAN CHASE BANK, N.A., complains of Defendant, GHADA MAGHREBI, and would respectfully show the following:

GENERAL ALLEGATIONS

1. This is an action for damages that are within the jurisdictional limits of this Court.

2. Venue of this action is proper in the county named above because Defendant is a resident of this county.

3. Plaintiff is a national banking association organized and existing under the laws of the United States of America.

4. Chase Bank USA, N.A., merged with and into JPMorgan Chase Bank, N.A., effective May 18, 2019.

5. Defendant applied for and received a credit account, which is owned and administered by Plaintiff (the "Account"). Defendant used or authorized the use of the Account numbered XXXXXXXXXXX[redacted] for acquisition of goods, services, balance transfers or cash advances.

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6. Defendant failed to make periodic payments as required and the Account was subsequently charged-off. The entire balance on the Account is owed to Plaintiff and is presently due and payable in full.

7. The current Account balance is $19,372.48, which includes any applicable payments, credits, fees and interest as per the underlying agreement. The Account is not accruing post charge-off interest.

8. In accordance with federal regulations, monthly periodic statements for the Account have been provided to Defendant. Attached hereto and incorporated herein as Exhibit A are copies of periodic account statements provided to Defendant prior to charge-off. Based on Plaintiff's records, there are no unresolved billing disputes related to the Account.

9. Through its undersigned attorney, Plaintiff has demanded payment from Defendant, but Defendant has not satisfied such demand. Plaintiff has performed all conditions precedent to the filing of this action, or all such, conditions precedent have occurred.

COUNT I – ACCOUNT STATED

Plaintiff realleges paragraphs one (1) through nine (9) as though fully stated herein.

10. Plaintiff asserts that Defendant's use of the credit account to purchase goods and services represented a periodic account, for which Plaintiff generated regular monthly statements, see Exhibit A attached.

11. By submitting payments and/or incurring additional charges in response to the statements generated by and provided by Plaintiff to Defendant, Defendant has acknowledged the consumer and/or business transactions between the parties. Defendant implicitly promised to pay Plaintiff the amount set forth in the statement.

12. There are no unresolved billing disputes made in response to receiving the account statements and, therefore, Defendant has agreed to the resulting balance including any fees and interest incurred. *See, Farley v. Chase Bank, USA, NA,* 37 So. 3d 936 (Fla 4th

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DCA 2010).

13. Defendant is liable to Plaintiff for the account balance of $19,372.48. Plaintiff seeks judgment for such sum.

WHEREFORE, premises considered, Plaintiff prays that Defendant be summoned to appear, and that upon entry of default or final hearing, Plaintiff have judgment against Defendant for $19,372.48, which is the balance due on the credit account, and all such other and further relief to which Plaintiff may be justly entitled.

Respectfully submitted,
ANDREU, PALMA, LAVIN, & SOLIS, PLLC

/s/ Oleksandra Piliviko, Esq. - FBN 1015987

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THIS COMMUNICATION IS FROM A DEBT COLLECTOR AND IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

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EXHIBIT A

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Mobile: Download the Chase Mobile® app today

October 2025

New Balance
$19,372.48

CHASE FREEDOM UNLIMITED REWARDS SUMMARY

Private account identifiers and statement details redacted

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Call Customer Service:
In U.S. 1-800-524-3880
Spanish 1-888-446-3308
Pay by phone 1-800-436-7958
International 1-302-594-8200
We accept operator relay calls

Send Inquiries to:
P.O. Box 15298
Wilmington, DE 19850-5298

Mail Payments to:
P.O. Box 1423
Charlotte, NC 28201-1423

Visit Our Website:
www.chase.com/cardhelp

[redacted]

Private account identifiers and statement details redacted

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[redacted]

Private account identifiers and statement details redacted

12/2[redacted]

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New Balance	Total Balance for	Monthly Payment	Interest Saving

[redacted]

Private account identifiers and statement details redacted

[redacted]

This Statement is a Facsimile - Not an original

12/2[redacted]

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March 2025

New Balance
$16,149.80

CHASE FREEDOM UNLIMITED REWARDS SUMMARY

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Call Customer Service:
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Spanish 1-888-446-3308
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[redacted]

Private account identifiers and statement details redacted

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[redacted]

Private account identifiers and statement details redacted

12/2[redacted]

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What is an Interest Saving Balance?

[redacted]

Private account identifiers and statement details redacted

[redacted]

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