

06-08-CD
CACV of Colorado vs Richard Young

Merriman invest vs Richard Young
2006-8-CD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

CACV OF COLORADO

Plaintiff

NO: 06-08-CD

vs.

COMPLAINT IN CIVIL ACTION

RICHARD YOUNG

Defendant

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

James C. Warmbrodt, 42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
436 Seventh Avenue, Suite 2718
Pittsburgh, PA 15219
(412) 434-7955
FAX: 412-338-7130
04465689 C E Pit WAJ

FILED ICC Shff
MJA:15/01 Atty pd. 85.00
JAN 03 2006
LM

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

CACV OF COLORADO

Plaintiff
vs. Civil Action No
RICHARD YOUNG
Defendant

COMPLAINT AND NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by an attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET ST., SUITE 228
CLEARFIELD, PA 16830
(814) 765-2641, ext 1300-1301

COMPLAINT

1. Plaintiff, CACV OF COLORADO is a corporation with offices at 370 17TH ST., SUITE 5000 DENVER , CO 80202 .

2. Defendant is adult individual(s) residing at the address listed below:

RICHARD YOUNG
1 CAPRICORN CT
CLEARFIELD, PA 16830

3. Defendant applied for and received a credit card bearing the account number 5490875000029943 .

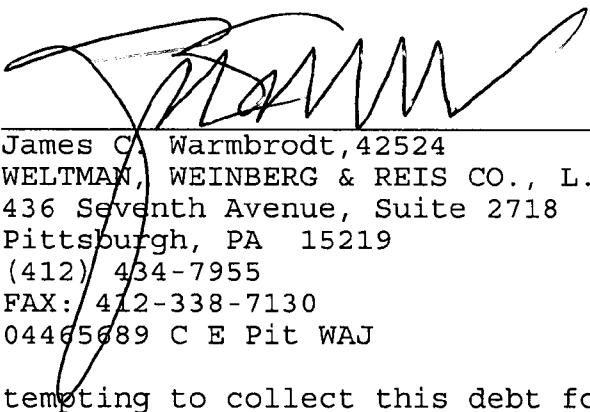
4. Defendant made use of said credit card and has a current balance due of \$2120.10 , as of November 30, 2005 .

5. Defendant is in default by failing to make monthly payments when due. As such, the entire balance is immediately due and payable to Plaintiff.

6. Plaintiff is entitled to the addition of interest at the rate of 6.000% per annum on the unpaid balance from November 30, 2005 . A copy of Plaintiff's is attached hereto, marked as Exhibit "1" and made a part hereof.

7. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and/or refused to pay the balance due to Plaintiff.

Wherefore, the Plaintiff prays for judgment in its favor and against Defendant , RICHARD YOUNG , INDIVIDUALLY , in the amount of \$2120.10 with continuing interest thereon at the rate of 6.000% per annum from November 30, 2005 plus costs.



James C. Warmbrodt, 42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
436 Seventh Avenue, Suite 2718
Pittsburgh, PA 15219
(412) 434-7955
FAX: 412-338-7130
04465689 C E Pit WAJ

This law firm is a debt collector attempting to collect this debt for our client and any information obtained will be used for that purpose.

ACCOUNT NUMBER: 5490 8750 0002 9943

PAYMENT DUE DATE 04/30/2002	NEW BALANCE \$2,120.10	MINIMUM DUE \$908.10
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RICHARD E YOUNG
PO BOX 449
BIGLER PA 16825-0449

Facsimile Copy



Chase CashBuilder MasterCard™
ACCOUNT NUMBER: 5490 8750 0002 9943

NEW BALANCE \$2,120.10	PAYMENT DUE DATE 04/30/2002	TOTAL CREDIT LINE \$1,500	TOTAL AVAILABLE CREDIT \$0.00	STATEMENT CLOSING DATE 04/05/2002
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Here is your Account Summary:

TOTAL	
Previous Balance	\$2,030.40
(-) Payments, Credits	0.00
(+) Purchases, Cash, Debits	58.00
(+) FINANCE CHARGES	31.70
(=) New Balance	2,120.10
Minimum Due	42.00
Past Due - Pay Immediately	244.00
Over Line - Pay Immediately	620.10
Minimum Payment Due	\$908.10

EXHIBIT

"1"

Here are your Charges and Credits at a glance:

TRAN. DATE	POST DATE	REF. NO.	DESCRIPTION OF TRANSACTIONS	CREDITS	CHARGES
04/05	04/05		OVERLIMIT FEE LATE CHARGE - MIN PYMT NOT RECD BY DATE		29.00 29.00
			Total of your credits and charges	0.00	58.00
			FAILURE TO MAKE PAYMENT HAS DAMAGED YOUR CREDIT RATING. HOWEVER, WE WANT TO WORK WITH YOU TO REBUILD YOUR CREDIT. CALL TODAY TO GET STARTED.		
			IN ORDER TO ENSURE PROMPT DELIVERY OF YOUR BILLING STATEMENT; PLEASE LET US KNOW IF YOUR MAILING ADDRESS, LISTED ABOVE IS CORRECT. IF IT IS NOT CORRECT, PLEASE WRITE YOUR CURRENT ADDRESS ON YOUR PAYMENT COUPON.		

Here's how we determined your Finance Charge*:

Days in Billing Cycle: 29

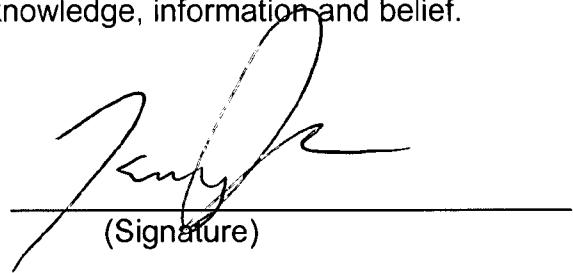
	DAILY PERIODIC RATE	AVERAGE DAILY BALANCE	PERIODIC/MIN. FINANCE CHARGE	TOTAL FINANCE CHARGE	NOMINAL ANNUAL PERCENTAGE RATE	ANNUAL PERCENTAGE RATE
Cash Purchases	0.05682% 0.05205%	\$654.86 \$1,494.77	\$9.14 \$22.56	\$9.14 \$22.56	20.74% 19.00%	20.74% 19.00%

* Please see reverse side for balance computation method and other important information.

Questions about your account? Credit Card lost or stolen? Call Chase Customer Service 24 hours a Day, 7 days a week, toll-free, at 1-800-444-9370 or write PO BOX 15919, WILMINGTON, DE 19850-5919. Para Servicio al Cliente en Espanol: 800-545-0464.

VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 PA.C.S. §4904 relating to unsworn falsifications to authorities, that he/she is Kenneth Urban
Unauthorized Agent of AFL of Colorado ^(Name)
(Title) (Company), plaintiff herein, that he/she is duly authorized to make this Verification, and that the facts set forth in the foregoing Complaint are true and correct to the best of his/her knowledge, information and belief.



(Signature)

WWR#04465689

FILED

JAN 03 2006

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

CACV OF COLORADO

Plaintiff No.06-08-CD

vs.

**PRAECIPE FOR ENTRY OF JUDGMENT
BY CONSENT**

RICHARD YOUNG

Defendant FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

James C. Warmbrodt, Esquire
PA I.D. #42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#04465689

FILED 1CC Notice
M 3 28 04 to Def
FEB 10 2006 1CC Statement
William A. Shaw
Prothonotary/Clerk of Courts
Atty pd. 20.00
(6K)

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

CACV OF COLORADO

Plaintiff

vs.

Civil Action No. 06-08-CD

RICHARD YOUNG

Defendant

PRAECIPE FOR JUDGMENT BY CONSENT

TO THE PROTHONOTARY:

Kindly enter Judgment against Defendant, Richard Young, in the amount of \$ 2,120.10 plus costs, based upon the consent of the parties.

CONSENTED TO:

WELTMAN, WEINBERG & REIS CO., L.P.A.,

RICHARD YOUNG ,

By: _____
Attorney for Plaintiff

By: Richard Young
Defendant

WWR#04465689

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

CACV OF COLORADO

Plaintiff

vs.

Civil Action No. 06-08-CD

RICHARD YOUNG

Defendant

**STIPULATION OF THE PARTIES FOR PAYMENT
AND FOR THE ENTRY OF JUDGMENT BY CONSENT**

TO THE PROTHONOTARY:

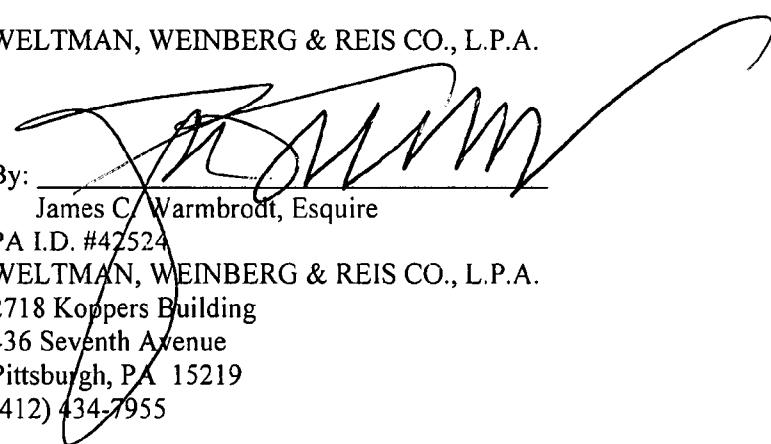
Kindly enter Judgment in favor of Plaintiff and against the Defendant, Richard Young, above-named, in the amount of \$ 2,120.10 pursuant to the Stipulation of the Parties for Payment and for the Entry of Judgment by Consent, as follows:

1. Defendant admits indebtedness to Plaintiff in the amount of \$ 2,120.10 with continuing interest thereon at a rate of 6.0% per annum plus costs from November 30, 2005.
2. To secure the repayment of said indebtedness, Defendant agrees that Judgment by Consent will be entered in favor of the Plaintiff and against the Defendant, Richard Young, in the amount of \$ 2,120.10 plus continuing interest thereon at the rate of 6.0% per annum from November 30, 2005 and costs.
3. Plaintiff agrees not to execute on its Judgment so long as Defendant causes to be delivered to Plaintiff the following payments in full by 12:00 NOON on the following dates:
 - (a) \$70.00 due by February 05, 2006;
 - (b) \$70.00 due on the 5th day of each consecutive month thereafter until the Judgment amount plus accrued interest and costs are paid in full.

4. All payments are to be made payable to the order of "CACV of Colorado"
5. All payments due under this agreement are to be received at the offices of Weltman, Weinberg & Reis, Co., L.P.A., 2718 Koppers Building, 436 Seventh Avenue, Pittsburgh, PA 15219.
6. In the event of default, each payment received shall be first attributed to costs, interest and then to principal.
7. Time is of the essence of this agreement and should the Defendant fail to have in the hands of Plaintiff or Plaintiff's counsel any payment in full within five (5) calendar days of the stated due date, then Plaintiff shall be immediately free to issue Execution as well as pursue all other remedies, in law or in equity, to collect the full balance of the Judgment entered hereunder plus appropriate additional interest and costs.
8. No act or omission of the Plaintiff, nor of anyone alleged to be acting on its behalf, shall constitute a waiver, estoppel, or any other excuse for non-performance of any duty undertaken by the Defendant in this Stipulation which the parties agree is final and complete.

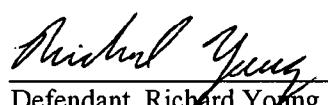
9. Intending to be legally bound, the parties set their hands and seals this 07 day of FEB,
20 06.

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: 

James C. Warmbrodt, Esquire
PA I.D. #42524
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR No. 04465689

By: 
Defendant, Richard Young

FILED

FEB 10 2006

William A. Shaw
Prothonotary Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

CACV OF COLORADO

Plaintiff

vs.

Civil Action No. 06-08-CD

RICHARD YOUNG

Defendant

NOTICE OF JUDGMENT OR ORDER

TO: Plaintiff
 Defendant
 Garnishee

You are hereby notified that the following
Order or Judgment was entered against you
on 21/01/06

Assumpsit Judgment in the amount
of \$ 2,120.10 plus costs.

Trespass Judgment in the amount
of \$ _____ plus costs.

If not satisfied within sixty (60)
days, your motor vehicle operator's license and/or registration will be
suspended by the Department of Transportation, Bureau of Traffic
Safety, Harrisburg, PA.

Entry of Judgment of
 Court Order
 Non-Pros
 Confession
 Default
 Verdict
 Arbitration
 Award
 By Consent

Prothonotary

RICHARD YOUNG
POB 449,
BIGLER, PA 16825

By: John C. Young
PROTHONOTARY (OR DEPUTY)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
STATEMENT OF JUDGMENT

CACV of Colorado, LLC
Plaintiff(s)

No.: 2006-00008-CD

Real Debt: \$2,120.10

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Richard Young
Defendant(s)

Entry: \$20.00

Instrument: Consent Judgment

Date of Entry: February 10, 2006

Expires: February 10, 2011

Certified from the record this 10th day of February, 2006.



William A. Shaw

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

CACV OF COLORADO

Plaintiff No. 06-08-CD

vs. PRAECIPE TO VACATE JUDGMENT

RICHARD YOUNG

Defendant FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

William T. Molczan, Esquire
PA I.D. #47437
WELTMAN, WEINBERG & REIS CO., L.P.A.
2718 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955

WWR#04465689

FILED 

MAR 03 2006
m/3:40/06
William A. Shaw
Prothonotary/Clerk of Courts
no 4C

IN THE COURT OF COMMON PLEAS CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

CACV OF COLORADO

Plaintiff

vs.

Civil Action No. 06-08-CD

RICHARD YOUNG

Defendant

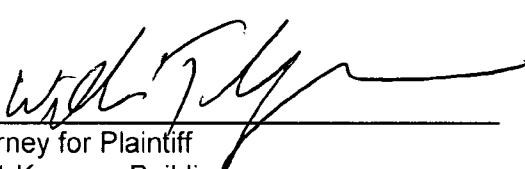
PRAECIPE TO VACATE JUDGMENT

TO THE PROTHONOTARY OF Clearfield COUNTY:

SIR:

Kindly vacate the judgment entered in the above case on February 10, 2006.

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: 
Attorney for Plaintiff
2601 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219
(412) 434-7955
WWR#04465689

FILED
MAR 03 2006
U.S. DISTRICT COURT
PROBATE COURT OF OREGON

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101124
NO: 06-08-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CAVC OF COLORADO
vs.
DEFENDANT: RICHARD YOUNG

SHERIFF RETURN

NOW, January 06, 2006 AT 1:05 PM SERVED THE WITHIN COMPLAINT ON RICHARD YOUNG DEFENDANT AT SHERIFF'S OFFICE, 1 N. 2ND ST., SUITE 116, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO RICHARD YOUNG, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING / HUNTER

FILED
02:47 PM
MAR 16 2006
WM
William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	WELTMAN	2363874	10.00
SHERIFF HAWKINS	WELTMAN	2363874	21.00

Sworn to Before Me This

So Answers,

____ Day of _____ 2006

Chester A. Hawkins
by Marilyn Harr
Chester A. Hawkins
Sheriff

FILED

MAR 16 2006

William A. Shore
Prothonotary/Clerk of Courts