

08-578-CD  
CSGA LLC vs George Kohute

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CSGA, LLC : CIVIL ACTION - LAW  
2200 Fletcher Avenue, 5<sup>th</sup> Floor :  
Fort Lee, NJ 07024 :  
Plaintiff : NO. 08-578-CD  
v. :  
George D Kohute :  
983 W Hannah St :  
Houtzdale, PA 16651-1916 :  
Defendant :  
:

**NOTICE TO DEFEND**

YOU have been sued in Court. If you wish to defend against the claim 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 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 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. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.**

**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  
Second & Market Streets  
Clearfield, PA 16830  
(814) 765-2641 x.50-51

BRONSON & MIGLIACCIO, LLP

By: Jordan W. Felzer, Esquire  
Attorney ID # 38670  
jfelzer@lobmlaw.com  
Three Neshaminy Interplex, Suite 301  
Trevose, PA 19053  
Telephone (800) 834-4066

FILED 1CC  
MILLER Sheriff  
MAN 31 2009  
1CC Atty  
William A. Shaw  
Prothonotary/Clerk of Courts  
Atty pd.  
5.00

**CIVIL ACTION - COMPLAINT**

Plaintiff, CSGA, LLC, as Assignee of BANK ONE, by and through its attorneys, Bronson and Migliaccio, LLP, represents as follows:

1. Plaintiff, CSGA, LLC, is a limited liability company organized and existing under the laws of the State of New York with a principal place of business at 2200 Fletcher Avenue, 5<sup>th</sup> Floor, Fort Lee, NJ 07024.

2. Defendant, George D Kohute, is an adult individual residing at 983 W Hannah St, Houtzdale, Pennsylvania 16651-1916.

3. Plaintiff, CSGA, LLC purchased certain accounts by which it is the lawful successor in interest to BANK ONE, and thereby possesses all rights pertaining thereto, including all rights to an account belonging to Defendant, as more specifically described below.

**COUNT I – BREACH OF CONTRACT  
CSGA, LLC v. George D Kohute**

4. Defendant utilized an extension of credit made available by BANK ONE, bearing account 4417124156944198, whereby Defendant would from time to time be advanced credit for purchases or expenditures in exchange for the promise to repay funds so utilized at an agreed upon rate of interest. All of the above was done at the specific request therefore by the Defendant.

5. There is a principal balance due and owing on the account in the amount of **\$16,275.62** plus accrued interest. A statement of account is attached hereto and marked as Exhibit "A" and is incorporated herein by reference.

6. There is an interest balance due and owing on the account in the amount of **\$2,953.25**. A statement of account is attached hereto and marked as Exhibit "A" and is incorporated herein by reference.

7. Plaintiff has made demand upon the Defendant for payment. More specifically, a written demand was made at least thirty (30) days prior to the filing of this Complaint.

8. Defendant is in breach of the terms of the agreement for the extension of credit and has neglected and refused to pay the outstanding balance. No recent payments have been received on the account.

WHEREFORE, Plaintiff CSGA, LLC respectfully requests judgment against the Defendant, George D Kohute, in an amount not exceeding the limits for mandatory arbitration, as follows:

- a. The principal sum of \$16,275.62, plus;
- b. Interest accrued in the amount of \$2,953.25;
- c. Costs and interest at the legal rate; or
- d. For such other and further relief as this Court deems just and proper.

**COUNT II – UNJUST ENRICHMENT**  
**CSGA, LLC v. George D Kohute**

9. Plaintiff hereby incorporates paragraphs one through eight above as though more fully set forth at length hereinafter.

10. The principal balance of \$16,275.62 represents the reasonable value of goods and

services, the benefit of which is inured to the Defendant at the expense of BANK ONE, creating an equitable claim which Plaintiff now holds as successor in interest.

11. The balance of \$2,953.25 represents interest accrued as of the date of this filing.

WHEREFORE, Plaintiff CSGA, LLC respectfully requests judgment against the Defendant, George D Kohute, in an amount not exceeding the limits for mandatory arbitration, as follows:

- a. The principal sum of \$16,275.62, plus;
- b. An amount of interest on the principal balance equal to the legal rate and running from the date the account was closed by the Original Creditor until present, representing the time-value of money on the credit extension utilized by the Defendant.
- c. Costs and interest at the legal rate going forward from today; or
- d. For such other and further relief as this Court deems just and proper.



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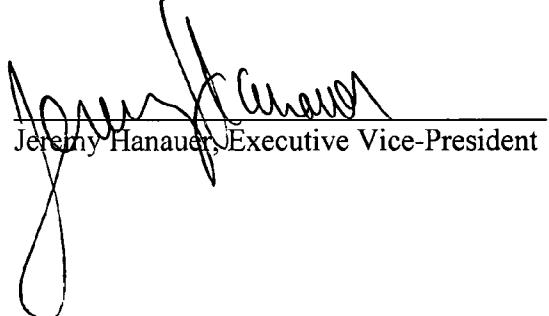
BRONSON & MIGLIACCIO, LLP  
*Attorneys for Plaintiff*  
By: Jordan W. Felzer, Esq., ID# 38670  
[jfelzer@lobmlaw.com](mailto:jfelzer@lobmlaw.com)  
Three Neshaminy Interplex  
Suite 301  
Trevose, PA 19053  
(800) 834-4066

**VERIFICATION**

I, Jeremy Hanauer, in my capacity as a Corporate Officer of CSGA, L.L.C., verify that the averments of fact contained in the foregoing *Complaint* are true and correct to the best of my knowledge information and belief. This statement is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

CSGA, LLC

Date: 1-24-08

  
\_\_\_\_\_  
Jeremy Hanauer, Executive Vice-President

ACCOUNT INFORMATION REPORT

ACCOUNT#:

14454335070600830

FINANCIAL

Forwarder: CSGA, LLC  
Acct#: 4417124156944198

Placement  
06/20/2007 \$16,275.62

Original Creditor: BANK ONE  
Debt Type: CC

	Last Payment
Principal	\$0.00
Interest	\$16,275.62
Attorney	\$2,953.25
Court	\$0.00
Misc	\$0.00

STATUS: PRE-LEGAL

Assigned to: CSGALITPA

WIP# 0 Days Left 0

BALANCE \$19,228.87

Personal Information

Debtor	1	First	MI	Last Name
		GEORGE	D	KOHUTE
Address	983 W HANNAH ST	ST PA	Zip	16651-1916
City	HOUTZDALE		Province	
Country	USA			
Work Tel		Home Tel	(814)339-7342	
Ext		Fax		
SS#	██████████	Driver's License #		
DOB	01/28/1961	State		
Spouse				

Bank and Asset

There is no bank information on this account.

Debt

Service Provided CREDIT CARD

Placement Breakdown

Principal	\$16,275.62	Debt Type	Credit Cards
Awarded Int			
Attorney Fees			
Court Costs		Last Payment Date	
Misc Costs		Last Payment Amount	
Accrued Int	\$1,805.50	Last Charge Date	
Total Placement	\$16,275.62	Last Charge Amount	

Original Loan Terms

Contract Date		Original Loan Amount
Number of Payments		Amount of Payments
Interest Rate %	19.99	Serial/Vin Number
Collateral		

"A"

**FILED**

**MAR 3 1 2008**

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103979  
NO: 08-578-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: CSGA, LLC  
vs.  
DEFENDANT: GEORGE D. KOHUTE

**SHERIFF RETURN**

NOW, April 02, 2008 AT 2:15 PM SERVED THE WITHIN COMPLAINT ON GEORGE D. KOHUTE DEFENDANT AT 983 W. HANNAH ST., HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO STEVE KOHUTE, BROTHER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	BRONSON	43262	10.00
SHERIFF HAWKINS	BRONSON	43262	36.18

**FILED**  
04/24/08  
JUL 14 2008  
WAS  
S

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

\_\_\_\_ Day of \_\_\_\_\_ 2008

So Answers,

*Chester A. Hawkins  
by Marley Hause*  
Chester A. Hawkins  
Sheriff

**FILED**

**JUL 14 2008**

William A. Shaw  
Prothonotary/Clerk of Courts

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

CSGA, LLC \* NO. 2008-578-CD  
Plaintiff \*  
vs. \*  
GEORGE D. KOHUTE \*  
Defendant \*

**ORDER**

NOW, this 25<sup>th</sup> day of June, 2013, upon the Court's review of the docket and noting no activity for a period of over four years, it is the ORDER of this Court that the case be moved to inactive status. The Prothonotary shall code the case in Full Court as Z-INACTA.

BY THE COURT,

FREDRIC J. AMMERMAN  
President Judge

No C.C.

Z 0/9:08cm

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