

08-2300-CD

Federated Fin Corp vs Frank Story

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

FEDERATED FINANCIAL CORPORATION OF AMERICA

Plaintiff

No. 08-2300-CD

vs.

COMPLAINT IN CIVIL ACTION

FRANK L STORY

Defendant

FILED ON BEHALF OF  
Plaintiff

COUNSEL OF RECORD OF  
THIS PARTY:

James C. Warmbrodt,  
P.A.I.D.# 42524  
Weltman, Weinberg & Reis Co., L.P.A.  
436 Seventh Avenue, Suite 1400  
Pittsburgh, PA 15219  
(412)434-7955  
Fax: 412-338-7130

WWR#6959365

*S*  
**FILED** *Atty. pd.*  
*m/2:04/8d* *05.00*  
**DEC 01 2008** *(in)* *icc Sheriff*  
William A. Shaw  
Prothonotary/Clerk of Courts

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

FEDERATED FINANCIAL CORPORATION OF AMERICA

Plaintiff

vs.

Civil Action No.

FRANK L STORY

Defendant

**COMPLAINT IN CIVIL ACTION 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

COURT ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
SECOND & MARKET STREETS  
CLEARFIELD, PA 16830  
(814) 765-2641, ext. 50-51

## COMPLAINT

1. Plaintiff is a corporation having offices in 30955 NORTHWESTERN HWY FARMINGTON HILLS, MI 48334-0000.
2. Defendant is an adult individual residing at 115 21ST ST CLEARFIELD, PA 16830.
3. Defendant applied for and received a credit card issued by Advanta bearing the account number 1316.
4. Contract was subsequent assigned to plaintiff.
5. Defendant made use of said credit card and has currently a balance due and owing to Plaintiff, as of OCTOBER 27 2008, in the amount of \$29,828.18.
6. Defendant is in default of the terms of the cardholder Agreement having not made monthly payments to Plaintiff thereby rendering the entire balance immediately due and payable. A true and correct copy of the Statement of Account is attached hereto, marked as Exhibit "1" and made a part hereof.
7. Plaintiff avers that the Cardholder Agreement between the parties provides that Plaintiff is entitled to the addition of finance charges at the rate of 30.64% per annum on the unpaid balance.
8. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and/or refused to pay the principal balance, finance charges or any part thereof to Plaintiff.



## PAYMENT INFORMATION

Account Number: 5584 1800 0190 1316  
Payment Due Date: **NOW DUE**  
New Balance: **15,420.72**  
Minimum Payment Due: **6,202.72**

Please check here if address, phone or  
e-mail changes are indicated on reverse side ☐

PLEASE WRITE IN  
PAYMENT ENCLOSED:

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THE ALTERNATIVE FACTOR  
FRANK L STORY  
114 CLEVELAND ST  
PUNXSUTAWNEY PA 15767-1826

537

MAKE PAYMENT TO:

ADVANTA BANK CORP  
PO BOX 8088  
PHILADELPHIA, PA 19101-8088



5584180001901316 1542072 0620272



Detach Top Portion and Enclose with Payment

ADVANTA PLATINUM BUSINESSCARD WITH CASH BACK STATEMENT

PLATINUM  
BUSINESSCARD

## ACCOUNT SUMMARY

Account Number	5584 1800 0190 1316
Total Credit Limit	12,500.00
Total Credit Available	0.00
Cash Advance Credit Limit	6,250.00
Cash Advance Credit Available	0.00
Billing Cycle Closing Date	04/26/06
Days In Billing Cycle	29
Payment Due Date	NOW DUE
Minimum Payment Due	6,202.72

## BALANCE SUMMARY

Previous Balance	14,975.85
(+) Purchases & Cash Advances	0.00
(+) Miscellaneous Fees	78.00
(+) Finance Charge	366.87
(-) Payments	0.00
(-) Credits	0.00
(=) New Balance	15,420.72

## REBATE SUMMARY

Previous Balance	+/- Earned/Adjusted This Statement	- Forfeited This Statement	= Current Balance
0.00	0.00	0.00	0.00

## TRANSACTIONS

Trans Date	Post Date	Reference Number	Activity Since Last Statement	Amount
04/26	04/26		OVERLIMIT FEE	39.00
04/26	04/26		LATE FEE	39.00
		*FINANCE CHARGE*	PURCHASES \$184.18 CASH ADVANCE \$182.69	366.87

## IMPORTANT NEWS

YOUR ACCOUNT IS CURRENTLY CLOSED

YOUR CHARGE PRIVILEGES ARE TERMINATED! AVOID  
FURTHER DAMAGE TO YOUR CREDIT RATING. PLEASE  
CALL US AT 1-866-271-7529.

## FINANCE CHARGES

	Average Daily Balance	Nominal Annual Percentage Rate	Daily Periodic Rate	Annual Percentage Rate	Finance Charges Due to Daily Periodic Rates	Transaction Fees
Purchases	7,592.34	30.12%	.08365%	30.12%	184.18	0.00
Cash Advances	7,530.87	30.12%	.08365%	30.12%	182.69	0.00

## PAYMENT SUMMARY

Payment Due	455.00
+ Amount Over Credit Limit	2,920.72
+ Past Due Amount	2,827.00
= Minimum Payment Due	6,202.72

FOR CUSTOMER SERVICE, PLEASE CONTACT US:



Online:  
www.advanta.com



By Mail: Advanta Bank Corp. P.O. Box 30715,  
Salt Lake City, UT 84130-0715



By Phone:  
1-800-705-7255

NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION

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 Joan L. Fleece  
(Name)  
VP of Port Svcs of Federated Financial Corp of Am., plaintiff herein, that  
(Title) (Company)

he/she is duly authorized to make this Verification, and that the facts set forth in the foregoing Complaint in Civil Action are true and correct to the best of his/her knowledge, information and belief.

Joan L. Fleece  
(Signature)

WWR#6959365

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
NO: 08-2300-CD

FEDERATED FINANCIAL CORPORATION OF AMERICA  
VS  
FRANK L. STORY

SERVICE # 1 OF 1

COMPLAINT

SERVE BY: 12/31/2008 HEARING: PAGE: 104988

DEFENDANT: FRANK L. STORY  
ADDRESS: 115 21ST. ST.  
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS

*No longer an inmate @ jail 12/3/08*

**SHERIFF'S RETURN**

NOW, \_\_\_\_\_ AT \_\_\_\_\_ AM / PM **SERVED** THE WITHIN

COMPLAINT ON FRANK L. STORY, DEFENDANT

BY HANDING TO \_\_\_\_\_ / \_\_\_\_\_

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS THEREOF.

ADDRESS SERVED \_\_\_\_\_

NOW \_\_\_\_\_ AT \_\_\_\_\_ AM / PM **POSTED** THE WITHIN

COMPLAINT FOR FRANK L. STORY

AT (ADDRESS) \_\_\_\_\_

NOW 12-10-08 AT 330 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO FRANK L. STORY

REASON UNABLE TO LOCATE NOT FOUND

SWORN TO BEFORE ME THIS

\_\_\_\_\_ DAY OF \_\_\_\_\_ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

*[Signature]*  
Deputy Signature

*S. Hunter*

Print Deputy Name

**FILED**

013:40cm  
DEC 10 2008

William A. Shaw  
Prothonotary/Clerk of Courts

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

FEDERATED FINANCIAL CORPORATION OF AMERICA

Plaintiff

No. 08-2300-CD

vs.

COMPLAINT IN CIVIL ACTION

FRANK L STORY

Defendant

FILED ON BEHALF OF  
Plaintiff

COUNSEL OF RECORD OF  
THIS PARTY:

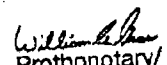
James C. Warmbrodt,  
P.A.I.D.# 42524  
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436 Seventh Avenue, Suite 1400  
Pittsburgh, PA 15219  
(412)434-7955  
Fax: 412-338-7130

WWR#6959365

I hereby certify this to be a true  
and attested copy of the original  
statement filed in this case.

DEC 01 2008

Attest.

  
Prothonotary/  
Clerk of Courts



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

FEDERATED FINANCIAL CORPORATION OF AMERICA

Plaintiff

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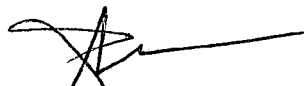
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WHEREFORE, Plaintiff demands judgment on Count I against Defendant, FRANK L STORY ,  
individually, in the amount of \$29,828.18 with continuing interest thereon at the Contract rate of 30.64 %  
per annum from OCTOBER 27 2008 and costs.

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

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



---

James C. Warmbrodt,  
P.A.I.D.# 42524  
Weltman, Weinberg & Reis Co., L.P.A.  
436 Seventh Avenue, Suite 1400  
Pittsburgh, PA 15219  
(412) 434-7955  
Fax: 412-338-7130  
WWR#: 6959365



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THE ALTERNATIVE FACTOR  
 FRANK L STORY  
 114 CLEVELAND ST  
 PUNXSUTAWNEY PA 15767-1826

537

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 Salt Lake City, UT 84130-0715



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 1-800-705-7255

NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION

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 Joan L. Fieps

(Name)

VP of Port Svcs of Federated Financial Corp of Am., plaintiff herein, that

(Title)

(Company)

he/she is duly authorized to make this Verification, and that the facts set forth in the foregoing Complaint  
in Civil Action are true and correct to the best of his/her knowledge, information and belief.

Joan L. Fieps

(Signature)

WWR#6959365

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104988  
NO: 08-2300-CD  
SERVICES 1  
COMPLAINT

PLAINTIFF: FEDERATED FINANCIAL CORPORATION OF AMERICA  
vs.  
DEFENDANT: FRANK L. STORY

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	WELTMAN	8797185	10.00
SHERIFF HAWKINS	WELTMAN	8797185	16.00

5  
**FILED**  
03:40LM  
MAR 13 2009  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2009

So Answers,



Chester A. Hawkins  
Sheriff

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

FEDERATED FINANCIAL

Plaintiff

vs.

FRANK L STORY

Defendant

No. : 08-2300-CD

PRAECIPE TO SETTLE, DISCONTINUE  
AND END WITHOUT PREJUDICE TO REFILE

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.  
1400 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

WWR#6959365

5 FILED 200  
m/11:13:01 Amy  
AUG 13 2009 Warmbrodt  
William A. Shaw  
Prothonotary/Clerk of Courts 610

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

FEDERATED FINANCIAL

Plaintiff

vs.

Civil Action No. : 08-2300-CD

FRANK L STORY

Defendant


PRAECIPE TO SETTLE, DISCONTINUE  
AND END WITHOUT PREJUDICE TO REFILE

TO THE PROTHONOTARY OF CLEARFIELD COUNTY:

SIR:

Settle, Discontinue and End the above-captioned matter upon the records of the Court without  
prejudice to refile and mark the costs paid.

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

By:   
Attorney for Plaintiff  
1400 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955  
WWR#6959365

SWORN TO AND SUBSCRIBED

before me this 7 day

of August, 2009

  
NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal  
Wayne A. Jones, Notary Public  
City of Pittsburgh, Allegheny County  
My Commission Expires June 29, 2010  
Member, Pennsylvania Association of Notaries