

**AFFIDAVIT OF FACTS AND PURCHASE OF ACCOUNT BY DEBT BUYER PLAINTIFF  
(Debt Buyer Actions)**

The undersigned, being duly sworn, deposes and says:

1. I am a/an [ *employee officer member*] of \_\_\_\_\_ [ *debt buyer plaintiff*] ("Plaintiff"), and I have access to Plaintiff's books and records ("Business Records"), including electronic records, relating to the account ("Account") of \_\_\_\_\_ [ *name of Defendant*]. The last four digits of the Account number are \_\_\_\_\_. In my position, I also have personal knowledge of Plaintiff's procedures for creating and maintaining its Business Records, including its procedures relating to the purchase and assignment of consumer credit accounts. Plaintiff's Business Records were made in the regular course of business, and it was the regular course of such business to make the Business Records. The Business Records were made at or near the time of the events recorded. Based on my knowledge of Plaintiff's Business Records, I have personal knowledge of the facts set forth in this affidavit.
2. On \_\_\_\_\_ [ *date*], Plaintiff purchased or was assigned the Account from \_\_\_\_\_ [ *original creditor or debt seller*] (the "Purchase"). At that time, \_\_\_\_\_ [ *original creditor or debt seller*] assigned all of its interest in the Account, including the right to any proceeds from the Account, to Plaintiff. As part of the Purchase, Business Records relating to the Account were transferred to Plaintiff. Following the Purchase, those Business Records were maintained in the ordinary course of Plaintiff's business.
3. As set forth in the affidavit(s) of:

\_\_\_\_\_  
[ *original creditor and all debt sellers*] submitted herewith, the complete chain of title, with the date of each sale or assignment of the Account, is as follows:

- a. \_\_\_\_\_ [ *original creditor and date of sale/assignment*]
  - b. \_\_\_\_\_ [ *debt seller and date of sale/assignment*]
  - c. \_\_\_\_\_ [ *debt seller and date of sale/assignment*]
  - d. \_\_\_\_\_ [ *debt seller and date of sale/assignment*]
4. At this time, Defendant owes \$ \_\_\_\_\_ on the Account. This amount includes the charge-off balance of \$ \_\_\_\_\_, post-charge-off interest of \$ \_\_\_\_\_, and post-charge-off fees and charges of \$ \_\_\_\_\_, less post-charge-off credits or payments made by or on behalf of the Defendant of \$ \_\_\_\_\_.

WHEREFORE, deponent demands judgment against Defendant for \$ \_\_\_\_\_ (plus interest from \_\_\_\_\_ [ *date*], if applicable), together with the costs and disbursements of this action.

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

Dated: \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Name

Sworn to before me this \_\_\_\_\_ day  
of \_\_\_\_\_, 20\_\_\_\_.

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