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IN THE CIRCUIT COURT OF CALLAWAY COUNTY, MISSOURI

HEIGHTS FINANCE CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 23CW-CV00
	)	
NICOLE PACE,	)	
	)	
Defendant.	)	

PETITION

Comes now plaintiff, by and through its attorney, James R. Tweedy and for its cause of action, states and avers to the court as follows:

1. Plaintiff is a corporation authorized to do business in the State of Missouri.

2. Defendant is a resident of Callaway County, Missouri.

3. That on or about the 9th day of December, 2021, Plaintiff and Defendant entered into a contract in which Defendant promised to repay Plaintiff sums advanced, a copy of which is attached hereto, marked as Exhibit "A" and incorporated herein by reference.

4. That Defendant has breached the agreement and has refused to make the monthly payments as promised to do.

5. That as a result of the Defendant's breach of contract, Plaintiff has been damaged.

6. That as of August 4, 2023 the payoff due on Defendant's loan

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with Plaintiff is $5,128.51.

7. That said contract provides that Plaintiff shall recover a reasonable attorneys fee from the defendant if defendant breaches the agreement and the note is referred to an attorney for collection.

8. That said contract provides that interest shall accrue at the rate of 35.99% per anum.

9. This is an attempt to collect a debt and any information obtained will be used for that purpose.

WHEREFORE Plaintiff prays for judgment against the defendant for the payoff amount due of $5,128.51, plus a reasonable attorney's fee, plus interest at the rate of 35.99% from and after August 4, 2023 for its costs incurred herein and for such other and further relief as the court deems just and proper in the premises.

Respectfully Submitted,

James R. Tweedy #38164
Courthouse Square
P.O. Box 203
Bloomfield, MO 63825
573-568-4000
jtweedy@tweedylawoffice.com
Attorney for Plaintiff

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Verification

The undersigned, of lawful age, being duly sworn on her oath, states that she is an authorized representative of Plaintiff, named above and that the facts stated in the Petition are true according to her best knowledge and belief and made under penalty of perjury.

Cristen L. Clyde
Cristen Clyde,
Heights Finance Corporation

STATE OF Kansas)
)ss.
COUNTY OF Sedgwick)

On this 30th day of October, 2023, before me personally appeared Cristen Clyde, to me personally known, who being duly sworn did say that she is authorized representative of Heights Finance Corporation, and that the said Petition was signed in behalf of said corporation and acknowledges said Petition to be the free act and deed of said corporation.

Notary Public
My term expires: 12-18-24

NORMA VELAZQUEZ
Notary Public - State of Kansas
My Appointment Expires 12-18-24

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NOTICE PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT

1. The amount of the debt and the creditor=s name for whom I am employed is contained on the document attached to this Notice.

2. That unless you dispute the debt within 30 days after receipt of this Notice, the debt will be assumed valid by my office. If you dispute this debt, I will obtain verification of the debt and a copy of the verification will be mailed to you by me. Upon written request by you within 30 days of receipt of this notice, I will provide you with the name and address of the original creditor, if different from the current creditor.

3. I am attempting to collect a debt and any information I obtain will be used for that purpose.

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