

**IN THE COURT OF COMMON PLEAS  
FRANKLIN COUNTY, OHIO**

Telhio Credit Union, Inc.	)	
330 Rush Alley	)	
Columbus, OH 43215,	)	Case No.
	)	
Plaintiff,	)	Judge
	)	
vs.	)	<b><u>COMPLAINT</u></b>
	)	
Chad Roberts	)	
2226 Puma Place	)	
Hilliard, OH 43026,	)	
	)	
and	)	
	)	
Kari J. Vanfossan	)	
1817 Galleon Boulevard	)	
Hilliard, OH 43026,	)	
	)	
Defendants.	)	

**COUNT ONE – Breach of Contract**

1. On or about November 20, 2023, defendant Chad Roberts (“Roberts”) executed a Closed End Note, Disclosure, Loan and Security Agreement (the “Note”), a copy of which is attached hereto as **Exhibit A** and incorporated herein by this reference. Plaintiff Telhio Credit Union, Inc. (“Plaintiff”) is the owner and holder of the Note.

2. Roberts has failed to make payment pursuant to the terms and conditions contained in the Note and the Note is now in default. Plaintiff has declared the entire unpaid balance of the Note now due and owing.

3. Now due and owing from Roberts to Plaintiff thereon is the principal amount of \$25,320.59, plus accrued interest of \$103.32 through June 5, 2025, plus interest at the rate of 7.39% per annum from June 6, 2025, late charges in the amount of \$26.48, and court costs.

## **COUNT TWO – Replevin**

4. Plaintiff incorporates by this reference each and every allegation set forth in the previous paragraphs as if the same were fully rewritten herein.

5. Pursuant to the terms of the Note, Roberts granted Plaintiff a security interest in a 2020 Dodge Grand Caravan SXT Wagon, VIN# 2C4RDGCG0LR180152 (the “Collateral”). A copy of the Ohio Certificate of Title evidencing Plaintiff’s lien on the Collateral is attached hereto as **Exhibit B** and incorporated herein by this reference.

6. By virtue of the default by Roberts under the terms of the Note, Plaintiff is entitled to immediate and permanent possession of the Collateral, and Roberts has failed to return the Collateral to Plaintiff.

7. Defendant Kari J. Vanfossan (“Vanfossan”) is believed to be in possession of the Collateral, and despite Plaintiff having a superior right to possession of the Collateral, has failed to return the Collateral to Plaintiff.

**WHEREFORE**, plaintiff Telhio Credit Union, Inc. prays for judgment against defendant Chad Roberts, on Count One, in the sum of \$25,320.59, plus accrued interest of \$103.32 through June 5, 2025, plus interest at the rate of 7.39% per annum from June 6, 2025, late charges in the amount of \$26.48, and court costs, and on Count Two, that the Collateral be recovered and permanent possession thereof be granted to Plaintiff, and for such other and further relief as may be appropriate, plus costs.

Respectfully submitted,

*/s/ Adam A. Beane*

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Adam A. Beane (0080343)

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*Attorney for Plaintiff*



The Ohio laws against discrimination require that all creditors make credit equally available to all creditworthy customers, and that credit reporting agencies maintain separate credit histories on each individual upon request. The Ohio Civil Rights Commission administers compliance with this law.

I acknowledge receipt of a copy of this notice. SIGNATURE OF BORROWER  
*Bob Roberts* DATE  
11/20/2023

CLOSED-END NOTE, DISCLOSURE, LOAN AND SECURITY AGREEMENT

OHIO CREDIT UNION  
501 PARK AVE.  
HAMILTON, OH 45013

EXECUTED AT  
BOBB SAYS YES  
4639 WEST BROAD STREET  
COLUMBUS OH 43228

NAME AND ADDRESS OF BORROWER(S)

HAD ROBERTS  
226 PUMA PLACE  
MILLIARD OH 43026

SOCIAL SECURITY NUMBER ACCOUNT NUMBER If this loan is being made by mail, interest on this loan begins when the loan proceeds are mailed.

TRUTH-IN-LENDING DISCLOSURE

ANNUAL PERCENTAGE RATE: The cost of your credit as a yearly rate.	FINANCE CHARGE: The dollar amount the credit will cost you.	Amount Financed: The amount of credit provided to you or on your behalf.	Total of Payments: The amount you will have paid after you have made all payments as scheduled.
7.98	\$ 8012.58	\$ 30120.06	\$ 38132.64

NO. OF PAYMENTS AMOUNT OF PAYMENTS WHEN PAYMENTS ARE DUE  
72 529.62 MONTHLY BEGINNING: 01/04/2024

Security: Collateral for other loans may also secure this loan. You are giving a security interest in your credit union account(s) and in: ☒ The goods and property being purchased. ☐ Other (describe) N/A

Insurance: Credit Life Insurance and credit disability insurance are not required to obtain credit and will not be provided unless you sign and agree to pay the additional cost.

TYPE	PREMIUM	SIGNATURE
Single Credit Life		You want credit life insurance <span style="float: right;">N/A</span>
Joint Credit Life	\$ N/A	<span style="float: right;">N/A</span>
Credit Disability		You want credit disability insurance <span style="float: right;">N/A</span>
	\$ N/A	<span style="float: right;">N/A</span>

Additional Charges: If a payment late by 15 days or more, you will be charged 5% of the monthly payment. Property Insurance: You may obtain property insurance from anyone you want that is acceptable to the credit union. If you obtain the insurance from us, you will pay \$40. Required Deposit Balance: The Annual Percentage Rate does not take into account your required deposit balance. Filing Fees: \$ N/A

Repayment: If you pay off early, you will not have to pay a penalty. You will receive a refund of any prepaid finance charges you may have paid. See your contract documents for any additional information about nonpayment, default, any required repayment in full before the scheduled date and prepayment refunds and penalties.

ITEMIZATION OF AMOUNT FINANCED

AMOUNT PAID TO OTHERS ON YOUR BEHALF	AMOUNT PAID TO YOU DIRECTLY	AMOUNT PAID ON YOUR ACCOUNT
	\$ N/A	\$ N/A

\$ 23490.95 TO BOBB SAYS YES	\$ 3244.00 TO SAC VSC
\$ 1935.11 TO STATE OF OHIO/FEES & TAXES	\$ 295.00 TO PROCESSING FEE
\$ 1200.00 TO GAP	\$ 250.00 TO DOC FEE
\$ N/A TO N/A	\$ N/A TO N/A
\$ N/A TO N/A	\$ 295.00 TO PREPAID FINANCE CHARGE

NOTE AND PLEDGE OF SHARES

Interest Rate Loan: I promise to pay the credit union \$ 30415.06 plus interest at the rate of 7.64 % per year on the unpaid balance. The undersigned pledge myself to pay the principal and interest of this note or any extension thereof in consecutive installments.

INSTALLMENTS OF (principal and interest)	PAYABLE IN	THE FIRST PAYMENT TO BE MADE ON	AND A LIKE AMOUNT	PLUS AN IRREGULAR OR FINAL PAYMENT
529.62	72	01/04/2024	N/A	\$ N/A DUE ON N/A

The rest of the terms and conditions of this Note are on the reverse side. You also pledge your accounts in the credit union in accordance with the "Contractual Pledge of Shares" on the reverse side. The Security Agreement is continued on the reverse side.

COLLATERAL

MAKE	YEAR	MODEL	TYPE OF VEHICLE	IDENTIFICATION NUMBER
DODGE TRUCK	2020	GRAND CARAVAN	SXT WAGON	2C4RDGCG0LR180152

Property: (Describe)   
 A

You are buying or using the Collateral primarily for: ☐ Personal, family or household purposes ☐ Farming operations ☐ Business use

LOAN SIGNATURES

I agree that the terms and conditions in the disclosure statement and the loan and security agreements located on the reverse side of this document shall apply to this loan. If there is more than one borrower, we agree that all the conditions of the loan and security agreements governing this loan shall apply to both jointly and severally. I acknowledge that I have received a completed copy of the loan and security agreements and disclosure statement.

BORROWER'S SIGNATURE <i>Bob Roberts</i> <span style="float: right;">DATE 11/20/2023</span>	WITNESS <i>[Signature]</i> <span style="float: right;">DATE 11/20/2023</span>
BORROWER'S SIGNATURE <span style="float: right;">DATE N/A</span>	WITNESS <span style="float: right;">DATE 11/20/2023</span>

other side for additional terms and conditions. NOTICE: The Annual Percentage Rate May Be Negotiable With The Dealer.





OH

## OHIO CERTIFICATE OF TITLE

OH

ISSUING COUNTY FRANKLIN  
ISSUING TITLE OFFICE # 2501  
RESIDENT COUNTY FRANKLIN

STATE OF OHIO  
REPLACEMENT

TITLE No. 25 1867 2263  
ISSUE DATE 05/30/2025

IDENTIFICATION NUMBER  
2C4RDGCG0LR180152

YEAR  
2020

MAKE  
DODG

MAKE DESCRIPTION  
DODGE

CONVERSION

MILEAGE  
75,791

BODY TYPE  
SW

MODEL DESCRIPTION  
GRAND CARAVAN

EVIDENCE  
OH-2303590738

MILEAGE NOTATION  
ACTUAL

COMMENTS

PURCHASE PRICE  
\$25,334.69

TAX  
\$1,900.10

NOTATION(S)

OWNER(S)  
CHAD ROBERTS

2226 PUMA PL  
HILLIARD, OH 43026

PREVIOUS OWNER(S)  
BOBB SAYS YES

4639 W BROAD ST  
COLUMBUS, OH 43228

FIRST LIENHOLDER  
TELHIO CREDIT UNION

DATE OF LIEN 12/05/2023

P O BOX 1449  
COLUMBUS, OH 43216

LIEN DISCHARGE  
Lienholder

by:

Authorized Signature

Date

CLERK LIEN CANCELLATION

by:

Deputy Clerk

Date

WITNESS MY HAND AND OFFICIAL SEAL THIS 30TH DAY OF MAY, 2025

%231603600



%231603600



DEALER PERMIT  
UD024311



*Maryellen O'Shaughnessy*

MARYELLEN O'SHAUGHNESSY  
CLERK OF COURTS

L

99A  
MRB

TITLE DOCUMENT CONTAINS OHIO WATERMARK WHICH IS VISIBLE WHEN HELD TO LIGHT