

CHARLES H. CARREON
2165 S. Avenida Planeta
Tucson, Arizona 85710
Tel: 520-841-0835
Attorney Pro Se

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

CHARLES H. CARREON,

Case No.: 11-CV-39-FR2

Plaintiff,

vs.

TOYOTA FINANCIAL SERVICES CDE
CORPORATION, TOYOTA MOTOR
CREDIT CORPORATION, LITHIA TOYOTA
SCION, and Does 1 - 10

Defendants.

**NOTICE OF ERRATA ATTACHING
EXHIBITS OMITTED FROM
COMPLAINT FOR VIOLATION OF FAIR
DEBT COLLECTION PRACTICES ACT;
BREACH OF CONTRACT; AND REQUEST
FOR DECLARATORY RELIEF TO
PREVENT VIOLATION OF 42 U.S.C. §
1983 BY UNLAWFUL REPLEVIN**

TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD, PLEASE
TAKE NOTICE THAT the original Complaint filed on January 18, 2011 commencing this
action contained the following Errata: Exhibits 1 – 6 were omitted. Accordingly, the said
Exhibits are attached hereto and are incorporated by reference into the original Complaint.

Dated: January 19, 2011

CHARLES H. CARREON



CHARLES H. CARREON
Attorney Pro Se

EXHIBIT 1

TOYOTA MOTOR CREDIT CORPORATION

P.O. Box 15012
Chandler, AZ 85224-5012
(800) 279-9032



Date: 12/15/2010


CHARLES H CARREON
2165 S AVENIDA PLANETA
TUCSON, AZ 85710

Regarding your 2006 PRIUS

PLEASE CALL US!

We have been trying to contact you regarding your past due account with Toyota Financial Services. Unfortunately, your contact information that we have is not valid. Your account is currently past due for 10/27/2010 in the amount of \$ 1,223.14.

It is important that you telephone us immediately at 800-279-9032 to discuss your plans to bring your account current. We may be able to offer you a solution to help you bring your account current.

We are concerned about the status of your account and wish to extend to you the opportunity to bring your account current prior to our taking any further action.

If you have already remitted your payment, please provide us with the information requested below by filling out the bottom portion of this page and detaching it. Please return the detached portion in the enclosed envelope so that we may better service your account.

Sincerely,
Toyota Financial Services

CHARLES H CARREON
2165 S AVENIDA PLANETA
TUCSON, AZ 85710
Account: 704-013-6158948-0001

My new contact information is:

Home Telephone: _____

Work Telephone: _____

Alternate Telephone: _____

Address: _____

EXHIBIT 1, PAGE 1

PM91TFS

Charles Carreon
2165 S. Avenida Planeta
Tucson, Arizona 85710
Tel: 520-841-0835
Email: Chas@CharlesCarreon.com

September 21, 2010

Toyota Financial Services
PO Box 60114
City of Industry, CA 91716-0114

Re: Dispute Concerning Account Number 0136158948


Dear Sir or Madam:

My latest bill, enclosed, says I failed to make my August 2010 payment. This is incorrect. The payment was made and received according to my Chase Online Banking records, via Chase Online Payments. See the enclosed copy of the document so recording.

Also enclosed is my September 2010 payment. Nothing more is due.

Thank you.

Very truly yours,


Digitally signed by Charles H. Carreon
DN: cn=Charles H. Carreon,
o=Online Media Law, PLLC,
ou=Law Firm,
email=chas@charlescarreon.com
, c=US
Date: 2010.09.21 15:06:30 -07'00'

Charles Carreon

ONLINE MEDIA LAW LLC
2165 S AVENIDA PLANETA
TUCSON, AZ 85710-5461

91-2167
1221

1057

Aug 18, 2010

Pay to the order of Toyota Fin'l Svcs \$555.97

Five Hundred Fifty Five + 97/100 dollars


CHASE

JPMorgan Chase Bank, N.A.
Phoenix, Arizona 85073
www.Chase.com

Sep Pymt

for 0136158948

11221000241 8673144781057





For customer service, please call Toyota Financial Services at (800) 874-8822, or visit us online at www.toyotafinancial.com.

Statement Date 9/10/2010
 Account Number 013 6158948

SUMMARY OF CHARGES

Past Due Payment Amount	\$555.97
Unpaid Late Charges	\$27.80
Miscellaneous Charges	\$0.00
Current Payment Due	\$555.97

Total Amount Due **\$1,139.74**
 Payment Due Date 9/27/2010

To avoid a late charge of \$27.80 your payment must be received before 10/06/2010.

ACCOUNT INFORMATION

Regular Payment Amount	\$555.97
Last Transaction Amount	\$555.97
Date of Last Transaction	8/06/2010
Monthly Payments Made	54
Maturity Date	1/27/2012
Outstanding Balance*	\$9,474.25

*Outstanding Balance is not your payoff amount. To obtain your payoff amount and payoff instructions, please visit us online at www.toyotafinancial.com or contact Toyota Financial Services at (800) 874-8822.

Please refer to the back of this statement for important information on negative credit reporting, check processing and the specially designated address when sending any communication regarding disputed payoffs.

IMPORTANT: To ensure timely delivery, please detach this portion and mail in the enclosed envelope with your payment. Make check or money order payable to Toyota Financial Services. Include your account number and name on the front of your check or money order.



AB 01 067085 63488 E 233 A

CHARLES H CARREON
 2165 S AVENIDA PLANETA
 TUCSON AZ 85710-5481

Protect your investment
 through
 timely vehicle maintenance.



CHECK YOUR OWNER'S MANUAL AND
 SCHEDULED MAINTENANCE GUIDE
 FOR SERVICING DETAILS.

Account Number 013 6158948
 Payment Due Date 9/27/2010
 Total Amount Due \$1,139.74

Amount Enclosed \$

Please fill in circle completely if you're using the form on the reverse side to update your address or phone number.

TOYOTA FINANCIAL SERVICES
 PO BOX 60114
 CITY OF INDUSTRY CA 91716-0114

0136158948 2 0113974 0116754

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Wednesday, August 04, 2010

[Payments & Transfers](#) > [Bill Payment Activity](#) > Payment Detail**Payment Detail**[Help with this page](#)**I'd like to...**

- ▶ [See pending approvals](#)
- ▶ [Pay bills](#)
- ▶ [Add Payee](#)
- ▶ [See more choices](#)

Review your payment — Your payment information is listed below. Click the  icon for more information about an item.


Note: If your Payee says they haven't received your payment (or that they didn't receive your payment on time), you can use an online proof of payment to show that the payment was made. If a proof of payment is available, it will be displayed next to your payment's status below.


About Payment


Pay To Toyota
800-874-8822



Pay From BUSINESS CLASSIC (...4478)


Amount (\$ USD) \$555.97

Scheduled On  08/04/2010 at 09:50 PM ET

Send On  08/05/2010

Deliver By  08/06/2010

Delivery Method  
1 DAY

Status  Funded

Funds for this payment have been withdrawn from your available balance and your payment is in process. Your available balance has been updated to reflect the debit for this payment.

Submitted by Administrator

Last modified by Administrator

Approved by Not Available

Transaction Number 882548866

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EXHIBIT 2

BILLING STATEMENT

For customer service, please call Toyota Financial Services at (800) 874-8822, or visit us online at www.toyotafinancial.com.



Statement Date 12/10/2010
Account Number 013 6158948

SUMMARY OF CHARGES

Past Due Payment Amount	\$1,111.94
Unpaid Late Charges	\$111.20
Miscellaneous Charges	\$0.00
Current Payment Due	\$555.97

Total Amount Due \$1,779.11
Payment Due Date 12/27/2010

To avoid a late charge of \$27.80 your payment must be received before 1/07/2011.

ACCOUNT INFORMATION

Regular Payment Amount	\$555.97
Last Transaction Amount	\$555.97
Date of Last Transaction	11/05/2010
Monthly Payments Made	56
Maturity Date	1/27/2012
Outstanding Balance*	\$8,535.38

*Outstanding Balance is not your payoff amount. To obtain your payoff amount and payoff instructions, please visit us online at www.toyotafinancial.com or contact Toyota Financial Services at (800) 874-8822.

Please refer to the back of this statement for important information on negative credit reporting, check processing and the specially designated address when sending any communication regarding disputed payoffs.

IMPORTANT: To ensure timely delivery, please detach this portion and mail in the enclosed envelope with your payment. Make check or money order payable to Toyota Financial Services. Include your account number and name on the front of your check or money order.

TOYOTATHON

OVER 30 YEARS OF GREAT DEALS.

Ask your participating Toyota dealer about our lease and finance programs, as well as vehicle protection plans, available to qualified customers through Toyota Financial ServicesSM and the dealer.

For more information, go to www.toyota.com



AB 01 066318 06196 E 233 A

CHARLES H CARREON
2165 S AVENIDA PLANETA
TUCSON AZ 85710-5461

Account Number 013 6158948
Payment Due Date 12/27/2010
Total Amount Due \$1,779.11

Amount Enclosed

\$

Please fill in circle completely if you're using the form on the reverse side to update your address or phone number.

TOYOTA FINANCIAL SERVICES
PO BOX 60114
CITY OF INDUSTRY CA 91716-0114

EXHIBIT 2

0136158948 2 0177911 0180691

EXHIBIT 3

TOYOTA MOTOR CREDIT CORPORATION

PO BOX 60114
CITY OF INDUSTRY, CA 91716-0114
(800) 279-9032



CHARLES H CARREON
2165 S AVENIDA PLANETA
TUCSON, AZ 85710

DATE OF NOTICE		11/01/2010
ACCOUNT NUMBER		704-013-6158948-0001
DESCRIPTION OF COLLATERAL		
YEAR	MAKE/MODEL	
2006	PRIUS	
VEHICLE IDENTIFICATION NUMBER		
JTDKB20U667065503		

NOTICE OF RIGHT TO CURE YOUR DEFAULT

Motor Vehicle: ☒ Retail Installment Contract ☐ Lease Agreement

You are now in default on the above-referenced retail installment contract or lease agreement. Toyota Motor Credit Corporation ("TMCC") is giving you the right to correct this default until **11/11/2010**. If you do so, you may continue with the contract as though you did not default. Your default consists of:

2 monthly payments past due ending with **September 2010**.

TOTAL AMOUNT DUE TO CURE DEFAULT: \$ 1,167.54

Correction of the default: On or before **11/11/2010**, you must do the following in order to cure your default:

PAY THE TOTAL AMOUNT DUE TO CURE DEFAULT AS SHOWN ABOVE.

You are reminded that another payment of **\$ 555.97** becomes due on **11/27/2010** and is not included in the TOTAL AMOUNT DUE TO CURE DEFAULT. If you do not correct your default by the date stated above, TMCC may exercise its rights against you under the law. If you default again under this contract, TMCC may not be required to and may not give you a chance to cure that default.

If you submit a payment to TMCC that is less than the TOTAL AMOUNT DUE TO CURE DEFAULT set forth above, TMCC may choose to keep that payment without waiving any rights it may have under the law, including but not limited to, any right it may have to retake possession of the vehicle which is the subject of your contractual obligation to TMCC.

This letter is a courtesy notice. You will not receive any further notices if you fail to cure your default; including sending your payment after the required date or for an amount less than that required to cure the default.

If you have any questions write or telephone TMCC promptly at the address and telephone number listed above. Note that this communication is an attempt by TMCC to collect a debt and any information obtained will be used for the purpose of collecting the debt.

Sincerely,

TOYOTA MOTOR CREDIT CORPORATION

EXHIBIT 3

EXHIBIT 4

Charles Carreon
2165 S. Avenida Planeta
Tucson, Arizona 85710
Tel: 520-841-0835
Email: Chas@CharlesCarreon.com

January 4, 2011

Via Fax: 310-787-3507

Via Email: geribrewster@yahoo.com

Geri Brewster, Esq.

General Counsel

Toyota Financial Services

Mail Dro Ef12

19001 South Western Avenue

Torrance, California 90509

Re: Dispute Concerning Account Number 0136158948

Dear Counsel:

In response to communications from TMCC and TFS, of which copies are enclosed herewith, PLEASE TAKE NOTICE THAT I dispute both the amount and legitimacy of the claim referenced above, and request that you comply with the requirements of 15 USC § 1692g and validate the claim by disclosing all documents pertinent to the claim you are asserting.

The amounts being claimed are in error, as according to my records, copies of which are enclosed, I made payments for August, September and November 2010. I will make no further payments on this account until I receive a clear and accurate statement that gives me full credit for all payments I have made, and eliminates all claims for late payments. Failure to validate the claimed debt will be deemed a violation of the FDCPA and legal action taken in response to such a violation.

Thank you.

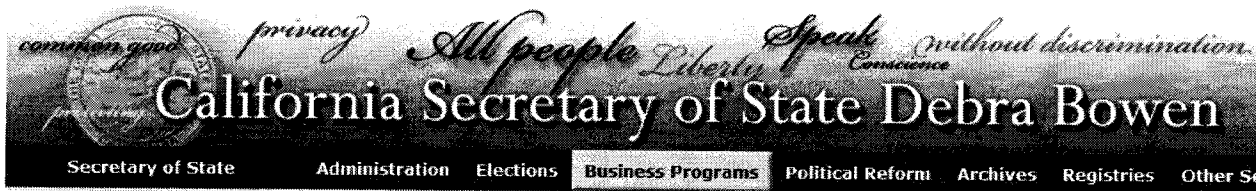
Very truly yours,

Original Digitally Signed by Charles Carreon

Charles Carreon

EXHIBIT 4

EXHIBIT 5

**Business Entities (BE)**

Online Services

- Business Search
- Disclosure Search
- E-File Statements
- Processing Times

Main Page

Service Options

Name Availability

Forms, Samples & Fees

Annual/Biennial Statements

Filing Tips

Information Requests
(certificates, copies &
status reports)

Service of Process

FAQs

Business Entity Detail

Data is updated weekly and is current as of Friday, January 14, 2011. It is not a complete or certified record of the entity.

Entity Name:	TOYOTA FINANCIAL SERVICES CDE CORPORATION
Entity Number:	C2804527
Date Filed:	10/04/2005
Status:	ACTIVE
Jurisdiction:	DELAWARE
Entity Address:	19001 S. WESTERN AVENUE
Entity City, State, Zip:	TORRANCE CA 90501
Agent for Service of Process:	C T CORPORATION SYSTEM
Agent Address:	818 W 7TH ST
Agent City, State, Zip:	LOS ANGELES CA 90017

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Alcaraz Tocchini LLP
Immigration Law Firm Lawyers in Tucson and Sacramento

Brewster, Geri Ann

Toyota Financial Services
Mail Drop Ef12
19001 S. Western Ave.
Torrance, CA 90501
Phone: (310) 787-3554
Fax: (310) 787-3507
[Contact Us](#)

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- [Guide to Hiring a Lawyer](#)

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THE STATE BAR OF CALIFORNIA

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FAQs
State Bar Overview

Home > Public > Attorney Search > Attorney Profile

ATTORNEY SEARCH
Geri Ann Brewster - #108905

Current Status: Active

This member is active and may practice law in California.
See below for more details.

Profile Information

The following information is from the official records of The State Bar of California.

Bar Number:	108905	Phone Number:	(562) 552-7674
Address:	4205 N Virginia Rd Long Beach, CA 90807 Map it	Fax Number:	Not Available
		e-mail:	geribrewster@yahoo.com
County:	Los Angeles	Undergraduate School:	West Virginia Univ; Morgantown WV
District:	District 7		

EXHIBIT 6

[Home](#) | [Help](#) | [Sign In](#)[Track & Confirm](#)[FAQs](#)

Track & Confirm

Search Results

Label/Receipt Number: **0496 9009 0930 1010 4645**Expected Delivery Date: **January 7, 2011**Class: **Priority Mail®**Service(s): **Delivery Confirmation™**Status: **Delivered**

Your item was delivered at 10:09 am on January 07, 2011 in
TORRANCE, CA 90509.

Detailed Results:

- **Delivered, January 07, 2011, 10:09 am, TORRANCE, CA 90509**
- **Arrival at Post Office, January 07, 2011, 10:04 am, TORRANCE, CA 90503**
- **Acceptance (APC), January 04, 2011, 8:09 pm, TUCSON, AZ 85711**

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FOIA

United States Postal Service
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EXHIBIT 6