

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT  
IN AND FOR ST. JOHNS COUNTY, FLORIDA  
CIVIL ACTION

NATIONAL ASSET DIRECT ACQUISITION LLC,  
Plaintiff,

vs.

CASE NO. 55-2009-CA-000608  
DIVISION 55

JOSEPH A. IANNELLI, et al,  
Defendant(s).


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NOTICE OF FILING

Plaintiff, NATIONAL ASSET DIRECT ACQUISITION LLC, gives Notice of Filing of Affidavit of Lost  
Note.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to all  
parties listed on the attached service list on this 10<sup>th</sup> day of July, 2009.

Florida Default Law Group, P.L.  
P.O. Box 25018  
Tampa, Florida 33622-5018  
(813) 251-4766

By:   
\_\_\_\_\_  
Scott A. Griffith  
Florida Bar No. 26139  
Justin J. Kelley  
Florida Bar No. 32106  
Anne M. Cruz-Alvarez  
Florida Bar No. 17140

What original documents?

AFFIDAVIT OF LOST NOTE

While Mr. Consuegra's signature has been known to change. This one does not look like the others on record in Hillsborough County except for the long squiggly line at the top.

STATE OF FLORIDA  
COUNTY OF HILLSBOROUGH

Above where? There is a Notice of Filing but no "above-entitled cause."

BEFORE ME, this day personally appeared, DANIEL C. CONSUEGRA, who is personally known to me, and who, being first duly sworn, deposes and states:

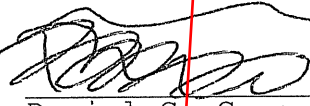
1. That affiant is the Attorney for the Plaintiff in the above-entitled cause. Affiant is the managing attorney for the Law Offices of Daniel C. Consuegra (herein the Firm).

2. That affiant is a member in good standing of the Florida Bar. At the time the original documents were received, a certain unnamed paralegal was charged with receiving and supervising the holding and distribution of these originals. This paralegal was properly trained, had experience and had maturity. This paralegal who normally acted responsibly in this capacity did not do so apparently in this instance. She was terminated on March 27, 2009. The original note was in the firm's control and custody. Our investigations reveal that this paralegal sent the original note regular mail to an unknown address.

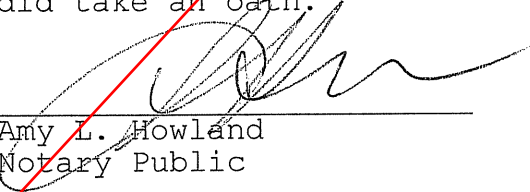
3. That the original note in this cause has been lost or destroyed and is no longer in possession of the Firm.

FURTHER AFFIANT SAYETH NAUGHT.

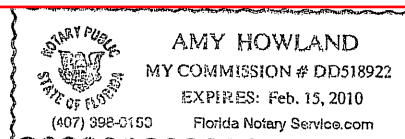
But no endorsed copy available?

  
Daniel C. Consuegra, Esquire

SWORN TO AND SUBSCRIBED before me this 2<sup>ND</sup> day of JULY, 2009 by Daniel C. Consuegra, who is personally known to me and who did take an oath.

  
Amy L. Howland  
Notary Public

How convenient, no ability to track or verify. Someone just got a "surprise negotiable instrument" in the mail.



Sounds like a malpractice issue, not a "lost note" issue...or maybe just a "fraud on the court" issue.

F09017625

## Service List

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