

05-785-CD  
Citibank vs. Gloria Mae Kachman

Citibank v. Gloria Katchman  
2005-785-CD

BURTON NEIL & ASSOCIATES, P.C.  
By: Burton Neil, Esquire  
Identification No. 11348  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
(610) 696-2120  
Attorney for Plaintiff

*(E)*  
**FILED** *Atty*  
*pd. J*  
*85.00*  
JUN 01 2005  
William A. Shaw *ICCShff*  
Prothonotary/Clerk of Courts

CITIBANK (SOUTH DAKOTA) N.A. : IN THE COURT OF COMMON PLEAS  
701 East 60th Street North, Sioux Falls, SD

Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA  
v.

GLORIA MAE KACHMAN  
416 Arnold Avenue Rear, Clearfield PA 16830-2050

: NO. *05-785-CD*

Defendant : CIVIL ACTION - LAW

**COMPLAINT  
NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claim set forth against you. You are warned that if you fail to do so, the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

**YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.**

**IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.**

**LAWYER REFERENCE AND  
INFORMATION SERVICE**

David S. Meholick  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
Telephone No. 814-765-2641 Ext. 5982

BURTON NEIL & ASSOCIATES, P.C.  
By: Burton Neil, Esquire  
Identification No. 11348  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
610-696-2120  
Attorney for Plaintiff

---

CITIBANK (SOUTH DAKOTA) N.A. : IN THE COURT OF COMMON PLEAS  
701 East 60th Street North, Sioux Falls, SD  
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA  
v. : NO.  
GLORIA MAE KACHMAN  
416 Arnold Avenue Rear, Clearfield PA 16830-2050  
Defendant : CIVIL ACTION - LAW


### **Complaint**

1. The plaintiff is Citibank (South Dakota) N.A., with place of business located at 701 East 60th Street North, Sioux Falls, South Dakota.
2. The defendant is Gloria Mae Kachman, who resides at 416 Arnold Avenue Rear, Clearfield, Clearfield County, Pennsylvania.
3. Plaintiff, a national banking association, engages in various types of banking business including consumer lending through the issuance of credit cards.
4. Plaintiff furnished consumer credit to the defendant by means of a credit card with account number 5491492014948693 hereinafter referred to as the credit card account.
5. Plaintiff maintained an accurate and running record of all debits and credits to the credit card account in its books of account.
6. Plaintiff mailed defendant a written statement each month which accurately stated the debits and credits to the credit card account for the prior billing period.
7. Defendant received the monthly statements from plaintiff for the credit card account including the statement attached hereto as Exhibit A statement without protest, dispute or objection.
8. Defendant in not protesting, disputing or objecting to the statements including the Exhibit A statement thereby assented and agreed to the correctness of the balance due on the credit card account so as to constitute an account stated.

9. The amount due plaintiff on the account stated, less credits, if any issued subsequent to the Exhibit A statement, is \$7,116.21.

Wherefore, plaintiff demands judgment against defendant for the sum of \$7,116.21, and the costs of this action.

BURTON NEIL & ASSOCIATES, P.C.

By:   
Burton Neil, Esquire  
Attorney for Plaintiff

The law firm of Burton Neil & Associates, P.C. is a debt collector.

12/10/04

\$7116.21

\$9999.99

SITE:KC-CL

TM:CO-5000

ACID:KCB5352

04/08/05

19:58:34:

PMT DUE DATE

NEW BALANCE

MIN AMT DUE

GLORIA MAE KACHMAN  
416 ARNOLD AVE  
REAR  
CLEARFIELD  
16830-2050000

PA

CITI CARDS  
P.O. BOX 8111  
S HACKENSACK, NJ  
07606-8111

## Citi® Platinum Select® Card

Account Number

5491 4920 1494 8693

### Customer Service:

1-800-983-6453

PO Box 44167  
Jacksonville, FL  
32231-4167

Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
\$6670	\$0	\$6670	\$0	\$7116.21
Statement/ Closing Date	Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
11/16/2004	\$446.21 +	\$437.92 +	\$152.00 =	\$1036.13

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	11/16		Standard Purch	
			LATE FEE - OCT PAYMENT PAST DUE	35.00
	11/16		66 0000	70000000000
			OVER CREDIT LIMIT FEE	29.00
	11/16		62 0000	70000000000
			PURCHASES*FINANCE CHARGE*PERIODIC RATE	138.60
			84 0000	70000000000

Your account is seriously past due and your credit privileges have been suspended. Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am - 9 pm, or Saturday, 8 am - 5 pm, Central Time.

Our records show home phone 814-765-5269 and business phone 000-000-0000. Please update coupon if incorrect.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$6,913.61	\$64.00	\$0.00	\$138.60	\$7,116.21
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$6,913.61	\$64.00	\$0.00	\$138.60	\$7,116.21

Days This Billing Period: 29

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$6,980.29	0.06847%(D)	24.990%	24.990%
ADVANCES				
Standard Adv	\$0.00	0.06847%(D)	24.990%	24.990%

EXHIBIT

### Verification

I, Amanda Carter am an employee of Citicorp Credit Services, Inc., (USA) which is by contract the service provider for plaintiff CITIBANK (SOUTH DAKOTA) N.A. retained to perform services including but not primarily limited to collecting delinquent debt. I am authorized to make this verification as attorney-in-fact for plaintiff under powers of attorney from plaintiff to Citicorp Credit Services, Inc. (USA) and to me. The foregoing averments of fact in the within pleading are true and correct to the best of my knowledge, information and belief. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to the authorities.

Date:

05/04/05

✓  
Signature

Amanda Carter

Gloria Mae Kachman  
5491492014948693  
C-5202

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100519  
NO: 05-785-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.  
vs.  
DEFENDANT: GLORIA MAE KACHMAN

SHERIFF RETURN

NOW, June 09, 2005 AT 10:10 AM SERVED THE WITHIN COMPLAINT ON GLORIA MAE KACHMAN  
DEFENDANT AT 416 ARNOLD AVE. REAR, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY  
HANDING TO JOE KACHMAN, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND  
MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING / HUNTER

CM FILED  
0/11:00 AM  
JUN 13 2005

William A. Shaw  
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	9167	10.00
SHERIFF HAWKINS	NEIL	9166	20.37

Sworn to Before Me This

\_\_\_\_ Day of \_\_\_\_\_ 2005

So Answers,

  
Chester A. Hawkins  
Sheriff

CITIBANK (SOUTH DAKOTA) N.A.  
701 East 60th Street N, Sioux Falls, SD 57117  
Plaintiff

: IN THE COURT OF COMMON PLEAS  
: CLEARFIELD COUNTY, PENNSYLVANIA

VS.

: NO. 05-785-CD

GLORIA MAE KACHMAN  
416 Arnold Avenue Rear  
Clearfield PA 16830-2050

Defendant

: CIVIL ACTION - LAW

**FILED** @  
MB:1061 20.00  
JUL 21 2005 No CC  
William A. Shaw  
Prothonotary/Clerk of Courts  
Notice to Def.  
Statement to Pff

**Praeipie for Default Judgment**

To the Prothonotary:

Please enter judgment by default for want of an answer in the above case in favor of the plaintiff and against the defendant, and assess damages as follows:

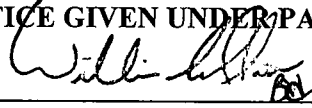
Principal: \$7,116.21

TOTAL \$7,116.21

Understanding that false statements herein made are subject to penalty under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities, I verify that:

1. The above are the precise last-known addresses of the judgment debtor and creditor.
2. The annexed notice of intention to file this praecipe was mailed to all parties against whom judgment is to be entered and to their record attorneys, if any, after the default occurred, and at least ten days prior to the date of the filing of this praecipe.
3. Pursuant to Section 201(b)(1)(A) of the Servicemembers Civil Relief Act of 2003 (SCRA), the defendant is not in the military service of the United States based on information received from the defendant and/or the Department of Defense website.

**JUDGMENT BY DEFAULT ENTERED  
AND DAMAGES ASSESSED AS ABOVE.  
NOTICE GIVEN UNDER P.A.R.CIV.P. 236**

  
Pro Prothonotary

BURTON NEIL & ASSOCIATES, P.C.

BY: 

Burton Neil, Esquire  
Attorney for Plaintiff  
I.D. #11348  
1060 Andrew Drive, Suite 170  
W. Chester, PA 19380

The law firm of Burton Neil & Associates is a debt collector.

C-5202





CITIBANK (SOUTH DAKOTA) N.A.

Plaintiff  
vs.

GLORIA MAE KACHMAN  
Defendant

: IN THE COURT OF COMMON PLEAS  
: CLEARFIELD COUNTY, PENNSYLVANIA  
: NO. 05-785-CD  
: CIVIL ACTION - LAW

**Notice of Intention to File Praecept for Default Judgment**

TO: Gloria Mae Kachman  
416 Arnold Avenue Rear  
Clearfield PA 16830-2050

DATE OF NOTICE: July 5, 2005

**IMPORTANT NOTICE**

You are in default because you have failed to enter a written appearance personally or by attorney and file in writing with the court your defenses or obligations to the claims set forth against you. Unless you act within ten (10) days from the date of this notice, a judgment may be entered against you without a hearing and you may lose your property or other important rights. You should take this notice to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office to find out where you can get legal help. This office can provide you with information about hiring a lawyer.

If you cannot afford to hire a lawyer, this office may be able to provide you with information about agencies that may offer legal services to eligible persons at a reduced fee or no fee.

**LAWYER REFERENCE AND  
INFORMATION SERVICE**

David S. Meholick  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
Telephone No. 814-765-2641 Ext. 5982

**BURTON NEIL & ASSOCIATES, P.C.**

BY: 


Burton Neil, Esquire  
Attorney for Plaintiff  
Identification No. 11348  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
610-696-2120

The firm of Burton Neil & Associates, P.C. is attempting to collect a debt.

C-5202



BURTON NEIL & ASSOCIATES, P.C.  
BY: Burton Neil, Esquire  
Identification No. 11348  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
610-696-2120  
ATTORNEY FOR: Plaintiff

 COPY

CITIBANK (SOUTH DAKOTA) N.A.  
Plaintiff

VS.

GLORIA MAE KACHMAN  
Defendant

: IN THE COURT OF COMMON PLEAS  
: CLEARFIELD COUNTY, PENNSYLVANIA  
: NO. 05-785-CD  
: CIVIL ACTION - LAW

**RULE OF CIVIL PROCEDURE NO. 236 (REVISED)**

Notice is given that a JUDGMENT in the above captioned matter has been entered against you  
on July 21, 2005.


Prothonotary

By: \_\_\_\_\_  
Deputy

If you have any questions concerning the above, please contact:

Burton Neil, Esquire  
Attorney for Party Filing  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
Phone: 610-696-2120

The law firm of Burton Neil & Associates is a debt collector.

 COPY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY ,  
PENNSYLVANIA  
STATEMENT OF JUDGMENT

Citibank (South Dakota) N.A.  
Plaintiff(s)

No.: 2005-00785-CD

Real Debt: \$7,116.21

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Gloria Mae Kachman  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: July 21, 2005

Expires: July 21, 2010

Certified from the record this 21st day of July, 2005.

\_\_\_\_\_  
William A. Shaw, Prothonotary

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

Received on \_\_\_\_\_, \_\_\_\_\_, of defendant full satisfaction of this Judgment,  
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

\_\_\_\_\_  
Plaintiff/Attorney