

06-155-CD
Citibank vs Kelly Reifer

Citibank South vs Kelly Reifer
2006-155-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

FILED
m/3:51 cm 1085.00 Atty
JAN 30 2006
1CC Shft

CITIBANK SOUTH DAKOTA N.A.
701 East 60th Street North, Sioux Falls, SD
Plaintiff
v.

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PENNSYLVANIA
: NO. 2006-155-CD
: 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. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
Telephone No. 814-765-2641 Ext. 5982

C-5848



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

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

: IN THE COURT OF COMMON PLEAS

v.

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO.

KELLY M REIFER
606 Brisbin Street, Houtzdale PA 16651-9024
Defendant

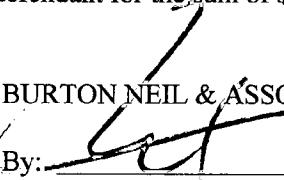
: CIVIL ACTION - LAW

Complaint

1. Plaintiff is CITIBANK SOUTH DAKOTA N.A., with place of business located at 701 East 60th Street North, Sioux Falls, South Dakota.
2. Defendant is Kelly M Reifer, who resides at 606 Brisbin Street, Houtzdale, Clearfield County, Pennsylvania.
3. Plaintiff is a national banking association, engaged 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 5424180874939652 hereinafter referred to as the credit card account.
5. Plaintiff kept accurate running records of all debits and credits to the account.
6. Plaintiff mailed to defendant monthly statements for the account including the billing statement attached hereto as Exhibit A. The monthly statements accurately stated the previous balance, the debits and credits to the account for the prior billing period.
7. Before plaintiff mailed Exhibit A, defendant had for many months made payments on account of the billing statement or retained the statement without payment.
8. Defendant's actions as set forth above constituted an account stated between parties for the sum of \$7,215.51 which sum reflects the Exhibit A statement balance less credits, if any, which were applied subsequent to the date of Exhibit A.

Wherefore, plaintiff demands judgment against defendant for the sum of \$7,215.51, and the costs of this action.

BURTON NEIL & ASSOCIATES, P.C.

By: 

Burton Neil, Esquire

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

02/13/04 \$7215.51 \$9999.99 SITE:KC-CL TM:CO-5000 ACID:KCB7150
 PAY DUE DATE: 04/29/05 EXPIRE DATE: 04/29/05 EXPIRE DATE: 04/29/05
 04/29/05 20:23:05

KELLY M REIFER
 263 BIRCH ST
 HOUTZDALE
 16651-9024000

PA

CITI CARDS
 P.O. BOX 8114
 S HACKENSACK, NJ
 07606-8114

Citi® Platinum Select® Card

For Customer Service, call or write
 1-800-950-5114

Account Number
 5424 1808 7493 9652
 PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 02/13/2004

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
01/22/2004	\$6100	\$0	\$3000	\$0	\$7215.51
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$1115.51 +	\$1070.67	\$173.61	\$7215.51

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	1/22		Standard Purch OVER CREDIT LIMIT FEE 62 0000	35.00
	1/22		PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000	0000000000 9.58 0000000000
	1/22		Standard Adv ADVANCES*FINANCE CHARGE*PERIODIC RATE 84 0000	37.81 0000000000
	1/22		Balance Transfer - Charged To Offer 4 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000	121.22 0000000000

Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

EXHIBIT

A

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(-) New Balance
PURCHASES	\$5,439.52	\$35.00	\$0.00	\$130.80	\$5,605.32
ADVANCES	\$1,572.38	\$0.00	\$0.00	\$37.81	\$1,610.19
TOTAL	\$7,011.90	\$35.00	\$0.00	\$168.61	\$7,215.51

Days This Billing Period: 31

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch Offer 4	\$403.00	0.07668%(D)	27.990%	27.990%
ADVANCES	\$5,099.56	0.07668%(D)	27.990%	27.990%
Standard Adv	\$1,590.60	0.07668%(D)	27.990%	27.990%

Verification

I, Jaime Payne 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: 5/26/05


Signature Jaime Payne

Kelly M Reifer
5424180874939652
C-5848

DOCUMENTS FOR FILING

OUR FILE: C-5848
DATE: January 24, 2006

TO: Clearfield County Prothonotary
1 North Second Street
Clearfield, PA 16830

RE: CITIBANK SOUTH DAKOTA N.A. v. Kelly M Reifer

The following is enclosed for filing: Complaint

- Please file the original
- Return a time-stamped copy to us in the envelope provided
- Forward all remaining documents to the Sheriff for processing.

Our check for your fee is enclosed.

Thank you,

BURTON NEIL & ASSOCIATES, P.C.
1060 Andrew Drive, Suite 170
West Chester, PA 19380
610-696-2120

P \$85.00
S \$100.00
D \$10.00

Priority Mail™



KELLY M REIFER
263 BIRCH ST
HOUTZDALE PA 16651-9024



7005 1820 0004 3548 5554

U. S. POSTAGE
PAID
HOUTZDALE, PA
16651
FEB 17 2006
AMOUNT

\$4.64

03067686-04



UNITED STATES
POSTAL SERVICE



16830

Court of Common Pleas
Clearfield County Court House
Clearfield, PA 16830

Reference # 2006-155-CD

2-21-06

no 2006-155-CD

Kelly m Reifer

CITIBANK South Dakota N. A.
701 East 60th Street North
Sioux Falls, SD

263 Birch Street
Houltville, PA 16651

SIR

In reference to no 2006-155-CD
civil action Lawsuit against Kelly m Reifer
Be advised that there is a investigation
going on about this matter. Cpl Daniel PSP
Clearfield was working on this matter. There
was Hearing Dates in August and October
of 2005 but the preliminary Hearings ^{KR}
were ~~KR~~ postponed and no dates were
given to me yet for the next hearing.
The charges were ~~KR~~ Identity fraud, and
I believe Identity Theft against Monica
McGonigal if any question feel free to
call me at (819) 378-5558

Thank you
Kelly m Reifer

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101216
NO: 06-155-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CITIBANK SOUTH DAKOTA, N.A.

vs.

DEFENDANT: KELLY M. REIFER

SHERIFF RETURN

NOW, February 01, 2006 AT 11:20 AM SERVED THE WITHIN COMPLAINT ON KELLY M. REIFER DEFENDANT AT 606 BRISBIN ST., HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO KELLY M. REIFER, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

FILED
01251301
APR 10 2006
SF

William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	18794	10.00
SHERIFF HAWKINS	NEIL	18794	34.02

Sworn to Before Me This

____ Day of _____ 2006

So Answers,

*Chester A. Hawkins
by Marilyn Harry*
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.

KELLY M REIFER
606 Brisbin Street
Houtzdale PA 16651-9024

Defendant : CIVIL ACTION - LAW

Praeclipe for Default Judgment

To the Prothonotary:

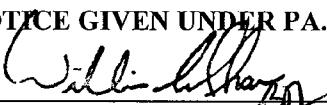
Please enter judgment by default for want of an answer in the above case in favor of the plaintiff and against the defendant, and assess damages as follows:

Principal:	\$7,215.51
TOTAL	\$7,215.51

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:

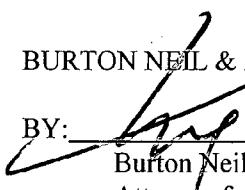
1. The above are the precise last-known addresses of the judgment debtor and creditor.
2. The annexed notice of intention to file this praecipe was mailed to all parties against whom judgment is to be entered and to their record attorneys, if any, after the default occurred, and at least ten days prior 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 PA.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-5848



CITIBANK SOUTH DAKOTA N.A.

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

vs.

: NO. 2006-155-CD

KELLY M REIFER

Defendant

: CIVIL ACTION - LAW

Notice of Intention to File Praeclipe for Default Judgment

TO: Kelly M Reifer
 606 Brisbin Street
 Houtzdale PA 166519024

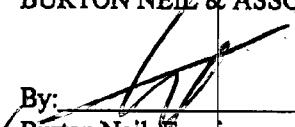
IMPORTANT NOTICE

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

DATE OF NOTICE: April 17, 2006

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

In making this communication, we advise our office is a
 debt collector.

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.
Plaintiff

VS.

KELLY M REIFER
Defendant

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PENNSYLVANIA
: NO. 2006-155-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

May 5, 2006

Prothonotary

By: William Neil
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.

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

Citibank South Dakota N.A.

Plaintiff(s)

No.: 2006-00155-CD

Real Debt: \$7,215.51

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Kelly M. Reifer

Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: May 5, 2006

Expires: May 5, 2011

Certified from the record this 5th day of May, 2006.



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