

06-177-CD
Citibank vs Jamie Luzier

Citibank vs Jamie Luzier
2006-177-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
M18:00/81
FEB 02 2006

William A. Shaw
Prothonotary/Clerk of Courts

Atty pd. 85.00
1 cclshff

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

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO.

06-177-CD

JAMIE LUZIER

2027 Elwood Drive, Clearfield PA 16830

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. Meholic

Court Administrator

Clearfield County Courthouse

Clearfield, PA 16830

Telephone No. 814-765-2641 Ext. 5982

C-8674



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

v.

JAMIE LUZIER
2027 Elwood Drive, Clearfield, PA
Defendant

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO.

: 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 Jamie Luzier, who resides at 2027 Elwood Drive, Clearfield, 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(n) AT&T Universal credit card with account number 5491130321815607 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 \$2,664.39 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 \$2,664.39, 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.

Your AT&T Universal Card Statement

September 16 - October 17, 2005



AT&T Universal Card

Page 1 of 3

JAMIE LUZIER

Account 5491 1303 2181 5607

Calling Card + PIN

No Annual Fee/Platinum Card

How To Reach Us

Visit: www.universalcard.com

Customer Service: 1-800-423-4343 or write

Cardmember Services, PO Box 44167

Jacksonville, FL 32231-4167

Quick Reference

Minimum Payment Due..... \$2,643.52
Due Date*..... November 11, 2005

*Payment must be received by 1:00 pm local time on the payment due date.

Amount Past Due..... \$365.60
Amount Over Limit..... \$243.52

Credit Line..... \$2,400.00
Available Credit..... \$0.00
Cash Advance Limit..... \$800.00
Available Cash Advance Limit..... \$0.00

Account Summary

Previous Balance	2,621.39
Payments and Adjustments	0.00
MasterCard® Activity	22.13
Total AT&T Services	0.00
New Balance	\$2,643.52

Note: Detailed activity starts on page 3.

Help is available! Please call the toll-free number shown above to learn about our special payment options. Please give us the opportunity to assist you.

date paid amount paid check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05491130321815607264352999995915

Your Account Number

5491 1303 2181 5607

Payment Due Date

NOV 11 2005

Your Total Balance

\$2643.52

Minimum Amount Due

\$2643.52

Please Enter Amount of Payment Enclosed

\$

84S MC 32 A 1 AR7051205



JAMIE LUZIER
2027 ELWOOD DR
CLEARFIELD PA 16830-6117



AT&T UNIVERSAL CARD
PO BOX 183061
COLUMBUS, OH 43218-3061



EXHIBIT

A

JAMIE LUZIER
Account 5491 1303 2181 5607
September 16 - October 17, 2005



Page 2 of 3

In the return envelope, please:

- 1 Make your check payable to AT&T Universal Card.**
- 2 Enclose your check or money order.** Include your account number and name on the front of your check or money order. Please, no cash or foreign currency.
- 3 Enclose your payment coupon.** Do not staple or tape it to your payment. Insert the payment coupon so that the entire AT&T Universal Card address appears through the window of your remittance envelope.

AT&T UNIVERSAL MASTERCARD ACTIVITY

Purchases..... 22.13
 Cash Advances and Checks..... 0.00
Total MasterCard Activity..... \$22.13

PURCHASES

Total MasterCard Purchases..... \$22.13

Standard Purch

Trans	Post	Description	Amount
	10/17	PURCHASES*FINANCE CHARGE*PERIOD	22.13
Total Standard Purch			\$22.13

CASH ADVANCES

Cash Advance Limit..... \$800.00* *This represents a portion of your total credit line.

FINANCE CHARGE INFORMATION

	Nominal APR	Periodic Rate	Days in x Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+ Fee/ FINANCE CHARGE	ANNUAL PERCENTAGE RATE
PURCHASES									
Standard Purch	9.900%	.02712%(D)	x	31	x		\$2,632.08	= \$22.13 +	\$0.00 9.900%
CASH ADVANCES									
Standard Adv	9.900%	.02712%(D)	x	31	x		\$0.00	= \$0.00 +	\$0.00 9.900%
							Total FINANCE CHARGE = \$22.13		

AT&T SERVICES SUMMARY

AT&T Universal Calling Card Calls..... \$0.00

Verification

I, **Anthony Draper** 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: 1-12-2006

Signature: Anthony Draper

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.

JAMIE LUZIER

Defendant

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO. 06-177-CD

: CIVIL ACTION - LAW

PRAECIPE TO SETTLE, END & DISCONTINUE

TO THE PROTHONOTARY:

Mark the above matter Settled, Ended and Discontinued.

BURTON NEIL & ASSOCIATES, P.C.

By: 

Burton Neil, Esquire
Attorney for Plaintiff

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

C-8674

FILED NUC
m/1:52pm (ur) 1 Cert of disc to
FEB 24 2008 ASBY B. Neil

William A. Shaw
Prothonotary



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

1060 ANDREW DRIVE, SUITE 170
WEST CHESTER, PENNSYLVANIA 19380
610-696-2120

Facsimile 610-696-4111

Email: Burton.neil@burt-law.com

February 21, 2006

Burton Neil
Edward J. O'Brien
Jay H. Pressman
Yale D. Weinstein

Refer to File #
C-8674

Clearfield County Prothonotary
1 North Second Street
Clearfield, PA 16830

RE: Citibank South Dakota, NA v. Jamie Luzier
Docket No. 06-177-CD

Documents for Filing

Enclosed please find a Praecipe to Settle, End and Discontinue for filing. Please file the original and return a copy to our office in the enclosed envelope. A check for your fees is enclosed.

BURTON NEIL & ASSOCIATES, P.C.

Enclosure
Check

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

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION



Citibank (South Dakota) N.A.

Vs.
Jamie Luzier

No. 2006-00177-CD

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on February 24, 2006, marked:

Settled, Ended and Discontinued

Record costs in the sum of \$85.00 have been paid in full by Burton Neil Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 24th day of February A.D. 2006.

William A. Shaw, Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101226
NO: 06-177-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.
vs.
DEFENDANT: JAMIE LUZIER

SHERIFF RETURN

NOW, February 08, 2006 AT 11:23 AM SERVED THE WITHIN COMPLAINT ON JAMIE LUZIER DEFENDANT AT 2027 ELWOOD DRIVE, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO TERESA LUZIER, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER /

FILED
019:09/31
APR 10 2008

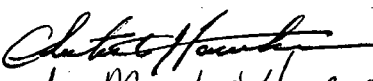
William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	18957	10.00
SHERIFF HAWKINS	NEIL	18957	20.39

Sworn to Before Me This

_____ Day of _____ 2006

So Answers,


Chester A. Hawkins
Sheriff