

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/1:55pm
MAY 26 2008
pd #85.00 Att
No CC
ICC Shff

William A. Shaw
Prothonotary

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. 06-846-CD

CHERYL A BLOOM
1526 Cherry Lane, Grampian PA 16838-9727
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

C-9480

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

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO.

CHERYL A BLOOM
1526 Cherry Lane, Grampian PA 16838-9727
Defendant

: CIVIL ACTION - LAW

Complaint

Count I

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 Cheryl A Bloom, who resides at 1526 Cherry Lane, Grampian, 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 5410654086305718 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 \$8,746.65 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 \$8,746.65, and the costs of this action.

COUNT II

9. Plaintiff furnished consumer credit to the defendant by means of a credit card with account number 5396560022056299 hereinafter referred to as the credit card account.

10. Plaintiff kept accurate running records of all debits and credits to the account.

11. Plaintiff mailed to defendant monthly statements for the account including the billing statement attached hereto as Exhibit B. The monthly statements accurately stated the previous balance, the debits and credits to the account for the prior billing period.

12. Before plaintiff mailed Exhibit B, defendant had for many months made payments on account of the billing statement or retained the statement without payment.

13. Defendant's actions as set forth above constituted an account stated between parties for the sum of \$8,647.97 which sum reflects the Exhibit B statement balance less credits, if any, which were applied subsequent to the date of Exhibit B.

Wherefore, plaintiff demands judgment against defendant for the sum of \$8,647.97, 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.

04/14/06

\$8746.65

\$8746.65

SITE:KC-CL

TM:CO-5000

ACID:KCB3104

PMT DUE DATE

NEW BALANCE

MIN AMT DUE

04/24/06

18:26:56:

CHERYL A BLOOM
RD #1 BOX 406
GRAMPIAN
16838-9727000

PA

CITI CARDS
PO BOX 183062
COLUMBUS, OH
43218-3062

Citi® Platinum Select® Card



Account Number

5410 6540 8630 5718

Customer Service:

1-800-950-5114

BOX 6062

SIOUX FALLS, SD

57117

Total Credit Line

\$8100

Available Credit Line

\$0

Cash Advance Limit

\$6500

Available Cash Limit

\$0

New Balance

\$8746.65

Statement/
Closing Date

03/20/2006

Amount Over
Credit Line

\$646.65

Past Due

\$1634.05

Purch/Adv
Minimum Due

\$242.11

Minimum
Amount Due

\$8746.65

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	3/20		Standard Purch OVER CREDIT LIMIT FEE	35.00
	3/20		62 0000 PURCHASES*FINANCE CHARGE*PERIODIC RATE	0000000000
			84 0000	237.11
				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.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$8,474.54	\$35.00	\$0.00	\$237.11	\$8,746.65
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$8,474.54	\$35.00	\$0.00	\$237.11	\$8,746.65

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$8,588.84	0.08627%(D)	31.490%	31.490%
ADVANCES				
Standard Adv	\$0.00	0.08627%(D)	31.490%	31.490%

EXHIBIT

A

CHERYLL A BLOOM
JOHN A BLOOM
Account 5396 5600 2205 6299
Calling Card + PIN
January 30 - February 28, 2006

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

C-9352

Quick Reference

Minimum Payment Due..... **\$8,647.97**
Due Date*..... **March 27, 2006**
*Payment must be received by 5:00 pm local time on the payment due date.

Amount Past Due..... **\$1,628.43**
Amount Over Limit..... **\$647.97**

Credit Line..... **\$8,000.00**
Available Credit..... **\$0.00**
Cash Advance Limit..... **\$8,000.00**
Available Cash Advance Limit..... **\$0.00**

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.

Account Summary

Previous Balance..... 8,400.37
Payments and Adjustments..... 0.00
MasterCard® Activity..... 247.60
Total AT&T Services..... 0.00
New Balance..... **\$8,647.97**

Note: Detailed activity starts on page 3.

date paid amount paid check #

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

05396560022056299864797999990005

Your Account Number

5396 5600 2205 6299

Please Enter Amount of Payment Enclosed

Payment Due Date
MAR 27 2006

Your Total Balance
\$8647.97

Minimum Amount Due
\$8647.97

\$

306S PM 32 A 1 AR7051272

CHERYLL A BLOOM
JOHN A BLOOM
RR 1 BOX 406
GRAMPAN PA 16838-9727

AT&T UNIVERSAL CARD
PO BOX 183070
COLUMBUS, OH 43218-3070

EXHIBIT

B

CHERYLL A BLOOM
JOHN A BLOOM
Account 5396 5600 2205 6299
January 30 - February 28, 2006



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.

CHERYLL A BLOOM
JOHN A BLOOM
Account 5396 5600 2205 6299
January 30 - February 28, 2006



AT&T UNIVERSAL MASTERCARD ACTIVITY

Purchases..... 212.60
Cash Advances and Checks..... 0.00
Fees..... 35.00
Total MasterCard Activity..... \$247.60

PURCHASES

Total MasterCard Purchases..... \$212.60

Standard Purch

Trans	Post	Description	Amount
	02/28	PURCHASES*FINANCE CHARGE*PERIOD	212.60
Total Standard Purch			\$212.60

CASH ADVANCES

Cash Advance Limit..... \$8,000.00* *This represents a portion of your total credit line.

FINANCE CHARGE INFORMATION

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
PURCHASES												
Standard Purch	31.470%	.08622%(D)	x	29	x	\$8,502.56	=	\$212.60	+	\$0.00	=	31.470%
CASH ADVANCES												
Standard Adv	31.470%	.08622%(D)	x	29	x	\$0.00	=	\$0.00	+	\$0.00	=	31.470%
Total FINANCE CHARGE											=	\$212.60

FEES

Standard Purch

Trans	Post	Description	Amount
	02/28	OVER CREDIT LIMIT FEE	35.00
Total Fees			\$35.00

AT&T SERVICES SUMMARY

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

Verification

I, Shauna Houghton 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:

4/26/00

Signature:

Shauna Houghton

Shawna Houghton

FILED

MAY 26 2006

William A. Shaw
Prothonotary

DOCUMENTS FOR FILING

OUR FILE: C-9480
DATE: May 23, 2006

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

RE: CITIBANK (SOUTH DAKOTA) N.A. v. Cheryl A Bloom

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101584
NO: 06-846-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.
vs.
DEFENDANT: CHERYL A. BLOOM

SHERIFF RETURN

NOW, June 05, 2006 AT 10:06 AM SERVED THE WITHIN COMPLAINT ON CHERYL A. BLOOM DEFENDANT AT 1526 CHERRY LANE, GRAMPIAN, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO CHERYL A. BLOOM, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

FILED
0/10:42 am
JUN 16 2006

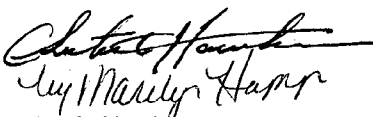
William A. Shaw
Prothonotary

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	22962	10.00
SHERIFF HAWKINS	NEIL	22962	28.68

Sworn to Before Me This

_____ Day of _____ 2006

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. 06-846-cd

CHERYL A BLOOM
1526 Cherry Lane
Grampian PA 16838-9727

Defendant : CIVIL ACTION - LAW

Praeipe for Default Judgment

To the Prothonotary:

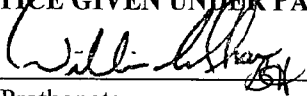
Please enter judgment by default for want of an answer in the above case in favor of the plaintiff and against the defendant, and assess damages as follows:

Count I:	\$8,746.65
Count II:	\$8,647.97
TOTAL	\$17,394.62

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 praecipec 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 praecipec.
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-9480

FILED ICC Notice
to Def.
JUL 13 2006 Statement
to Atty
William A. Shaw
Prothonotary/Clerk of Courts
Atty pd.
20.00
CP



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. 06-846-cd

CHERYL A BLOOM
1526 Cherry Lane
Grampian PA 16838-9727

Defendant

: CIVIL ACTION - LAW

FILED ICC Notice
to Def.
JUL 13 2006 Statement
to Atty
William A. Shaw
Prothonotary/Clerk of Courts
Atty pd. 20.00
CR

Praeipce for Default Judgment

To the Prothonotary:

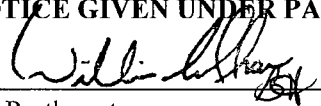
Please enter judgment by default for want of an answer in the above case in favor of the plaintiff and against the defendant, and assess damages as follows:

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TOTAL	\$17,394.62

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-9480



CITIBANK (SOUTH DAKOTA) N.A.

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

vs.

: NO. 06-846-cd

CHERYLL A BLOOM

Defendant

: CIVIL ACTION - LAW

Notice of Intention to File Praecipe for Default Judgment.

TO: Cheryll A Bloom
1526 Cherry Lane
Grampian PA 16838-9727

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: June 27, 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

CO:Y

CITIBANK (SOUTH DAKOTA) N.A.
Plaintiff

VS.

CHERYL A BLOOM

Defendant

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PENNSYLVANIA
: NO. 06-846-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 13, 2006

Prothonotary

By: William L. Hargis

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

COPY

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

No.: 2006-00846-CD

Real Debt: \$17,394.62

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Cheryl A. Bloom
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: July 13, 2006

Expires: July 13, 2011

Certified from the record this 13th day of July, 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

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

5 FILED pd \$7.00 Atty
m/1/14/4m
JUL 29 2009 1cc + 1 Cert of
Sat issued to
William A. Shaw
Prothonotary/Clerk of Courts Atty Neil

CITIBANK (SOUTH DAKOTA) N.A.

Plaintiff

VS.

CHERYL A BLOOM

Defendant

: IN THE COURT OF COMMON PLEAS

: CLEARFIELD COUNTY, PENNSYLVANIA

: NO. 06-846-cd

: CIVIL ACTION - LAW

PRAECIPE TO SATISFY JUDGMENT

TO THE PROTHONOTARY:

Mark the judgment **Satisfied**.

BURTON NEIL & ASSOCIATES, P.C.

By: 

Burton Neil, Esquire
Attorney for Plaintiff

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

C-9480

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Q33/L

CERTIFICATE OF SATISFACTION OF JUDGMENT

Citibank (South Dakota) N.A.

No.: 2006-00846-CD

Vs.

Debt: \$17,394.62

Cheryl A. Bloom


Atty's Comm.:

Interest From:

Cost: \$7.00

NOW, Wednesday, July 29, 2009 , directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 29th day of July, A.D. 2009.


Prothonotary 