

06-846-CD  
Citibank vs Cheryl A. Bloom

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** pd #85.00 A44  
MAY 1 55 am No CC  
MAY 26 2008 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-CJ  
: 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, 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.

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.

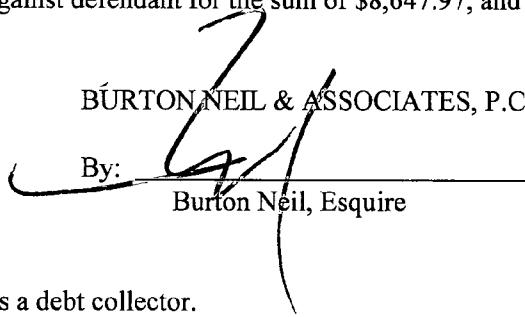
11. Plaintiff mailed to defendant monthly statements for the account including the billing statement attached hereto as Exhibit B. The monthly statements accurately stated the previous balance, the debits and credits to the account for the prior billing period.

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  
 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	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
BOX 6062 SIOUX FALLS, SD 57117	\$8100	\$0	\$6500	\$0	\$8746.65
	Statement/ Closing Date	Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
	03/20/2006	\$646.65	\$1634.05	\$242.11	\$8746.65

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

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE	Days This Billing Period: 32
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

# AT&T Universal Platinum Card

Charter Member



# AT&T Universal Card

Page 1 of 3

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](http://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..... \$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

## 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.

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.

*C.935*

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  
GRAMPIAN PA 16838-9727

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

*B*  
EXHIBIT

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



Page 3 of 3

## AT&T UNIVERSAL MASTERCARD ACTIVITY

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

### PURCHASES

**Total MasterCard Purchases..... \$212.60**

#### Standard Purch

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

### 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
<b>PURCHASES</b>							
Standard Purch	31.470%	.08622%(D)	x 29	x \$8,502.56	= \$212.60	+ \$0.00	31.470%
<b>CASH ADVANCES</b>							
Standard Adv	31.470%	.08622%(D)	x 29	x \$0.00	= \$0.00	+ \$0.00	31.470%
					Total FINANCE CHARGE	=	<b>\$212.60</b>

### FEES

#### Standard Purch

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

### 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: 4/6/06

Signature: Shauna Houghton

Spokane Honigford

**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  
O/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  
by Marilyn Harris*  
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.

CHERYL A BLOOM  
1526 Cherry Lane  
Grampian PA 16838-9727

Defendant : CIVIL ACTION - LAW

: NO. 06-846-cd

**Praecipe for Default Judgment**

To the Prothonotary:

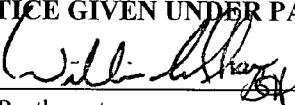
Please enter judgment by default for want of an answer in the above case in favor of the plaintiff and against the defendant, and assess damages as follows:

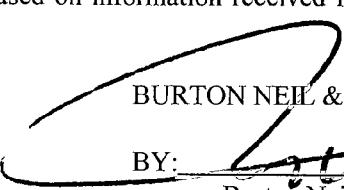
Count I:	\$8,746.65
Count II:	\$8,647.97
<b>TOTAL</b>	<b>\$17,394.62</b>

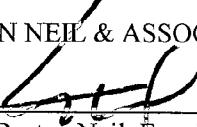
Understanding that false statements herein made are subject to penalty under 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities, I verify that:

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.  
701 East 60th Street N, Sioux Falls, SD 57117  
Plaintiff

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

VS.

CHERYL A BLOOM  
1526 Cherry Lane  
Grampian PA 16838-9727

Defendant : CIVIL ACTION - LAW

: NO. 06-846-cd

**Praecipe for Default Judgment**

**FILED** *1cc & Notice  
M 10/15/06 to Def.  
JUL 13 2006 Statement  
to Atty*  
William A. Shaw  
Prothonotary/Clerk of Courts  
*Atty pd. 20.00*  
*68*

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
<b>TOTAL</b>	<b>\$17,394.62</b>

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**

*William A. Shaw*  
\_\_\_\_\_  
Pro Prothonotary

BURTON NEIL & ASSOCIATES, P.C.

BY: *BN*

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

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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 Praeclipe 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. Meholic  
 Court Administrator  
 Clearfield County Courthouse  
 Clearfield, PA 16830  
 Telephone No. 814-765-2641 Ext. 5982

DATE OF NOTICE: June 27, 2006

BURTON NEIL &amp; 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

CC: *Cheryl*

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: Willie L. Blythe  
Deputy

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

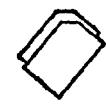
Burton Neil, Esquire  
Attorney for Party Filing  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
Phone: 610-696-2120

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.: 2006-00846-CD

 COPY

Real Debt: \$17,394.62

Atty's Comm: \$

Vs.

Costs: \$

Cheryl A. Bloom  
Defendant(s)

Int. From: \$

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

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

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

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

VS.

: NO. 06-846-cd

CHERYL A BLOOM

Defendant

: CIVIL ACTION - LAW

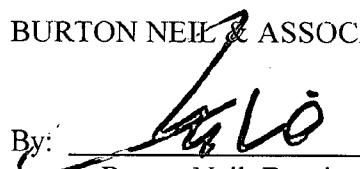
**PRAECIPE TO SATISFY JUDGMENT**

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

CERTIFICATE OF SATISFACTION OF JUDGMENT

No.: 2006-00846-CD

Citibank (South Dakota) N.A.

Debt: \$17,394.62

Vs.

Atty's Comm.:

Cheryl A. Bloom

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

Willie L. Blair lm  
\_\_\_\_\_  
Prothonotary