

06-1552-CD
Citibank vs Kevin P. Hoffman

2006-1552-CD
Citibank vs Kevin Hoffman

Burton Neil & Associates, P.C.
By: Burton Neil, Esquire ID. NO. 11348
1060 Andrew Drive, Suite 170
West Chester, PA 19380
(610) 696-2120
Attorney for Plaintiff

FILED Atty pd. 85.00
MHS/01
SEP 25 2006 ICCShff
William A. Shaw
Prothonotary/Clerk of Courts

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

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

Plaintiff

v.

: NO. 06-1552-CD

KEVIN P HOFFMAN
611 Keewaydin Road
Frenchville PA 16836-9206

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-10324



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.

KEVIN P HOFFMAN
611 Keewaydin Road, Frenchville PA 16836-9206
Defendant

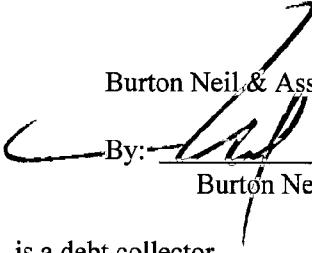
: CIVIL ACTION - LAW

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 Kevin P Hoffman, who resides at 611 Keewaydin Road, Frenchville, 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 5424180522581161 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 \$18,552.37 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 \$18,552.37, 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.

08/01/06 \$18552.37 \$18552.37

SITE:KC-CL TM:CO-5000 ACID:KCB3104
08/02/06 21:24:22KEVIN P HOFFMAN
611 KEWAYDIN RD
FRENCHVILLE
16836-9206000

PA

CITI CARDS
PO BOX 183054
COLUMBUS, OH
43218-3054

C-10324

Citi® Driver's Edge®
Platinum Select® Card-Charter RbtsAccount Number
5424 1805 2258 1161

Customer Services

1-800-756-4000

BOX 6500

SIOUX FALLS, SD

57117

	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
	\$16000	\$0	\$200	\$0	\$18552.37
Statement/ Closing Date		Amount Over Credit Line	Past Due	Perch/Adv Minimum Due	Minimum Amount Due
07/07/2006	\$2552.37		\$3646.20	\$707.93	\$18552.37

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
			Standard Purch	
7/07			LATE FEE - JUN PAYMENT PAST DUE	39.00
7/07			66 0000 PURCHASES*FINANCE CHARGE*PERIODIC RATE	0000000000 483.93
			84 0000	0000000000

Your late fee was based on your account balance as of the payment due date (07/03/06), which was \$18,029.44.

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	\$18,029.44	\$39.00	\$0.00	\$483.93	\$18,552.37
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$18,029.44	\$39.00	\$0.00	\$483.93	\$18,552.37
Days This Billing Period: 30					
Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE	
PURCHASES	\$18,262.27	0.08833%(D)	32.240%	32.240%	
Standard Purch					
ADVANCES	\$0.00	0.08833%(D)	32.240%	32.240%	
Standard Adv					

Verification

I, Jennifer Shepherd 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.

Jennifer Shepherd
Signature
Jennifer Shepherd
September 13, 2006

Kevin P Hoffman
5424180522581161

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101952
NO: 06-1552-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.

vs.

DEFENDANT: KEVIN P. HOFFMAN

SHERIFF RETURN

NOW, September 27, 2006 AT 2:44 PM SERVED THE WITHIN COMPLAINT ON KEVIN P. HOFFMAN DEFENDANT AT 611 KEEWAYDIN ROAD, FRENCHVILLE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO KEVIN P. HOFFMAN, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER /

FILED

NOV 13 2006
0 2:30 PM
William A. Shaw
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	25940	10.00
SHERIFF HAWKINS	NEIL	25940	32.24

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

v.

KEVIN P HOFFMAN
611 Keewaydin Road
Frenchville PA 16836-9206
Defendant

: NO. 06-1552-CD

: CIVIL ACTION - LAW

FILED *Atty pd 20.00*
m112:53671 Notice to Def.
DEC 08 2006
Statement
William A. Shaw to Atty
Prothonotary/Clerk of Courts

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:

Principal:	\$18,552.37
Credits:	\$1,700.00
TOTAL	\$16,852.37

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**

Walter L. Shaw *12/8/06*

Pro Prothonotary

Burton Neil & Associates, P.C.

By: *[Signature]*

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-10324



CITIBANK (SOUTH DAKOTA) N.A.

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

KEVIN P HOFFMAN

Defendant

: NO. 06-1552-CD

: CIVIL ACTION - LAW

Notice of Intention to File Praeclipe for Default Judgment

TO: Kevin P Hoffman
 611 Keewaydin Road
 Frenchville PA 16836-9206

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.

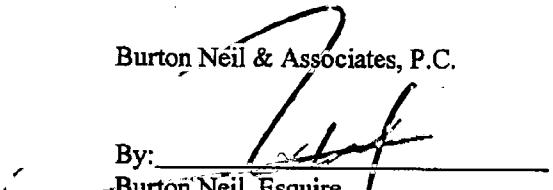
If you cannot afford to hire a lawyer, this office may be able to provide you with information about agencies that may offer legal services to eligible persons at a reduced fee or no fee.

**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: November 20, 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 ID. NO. 11348
1060 Andrew Drive, Suite 170
West Chester, PA 19380
610-696-2120
ATTORNEY FOR: Plaintiff

CITIBANK (SOUTH DAKOTA) N.A.
Plaintiff

v.

KEVIN P HOFFMAN
Defendant

: IN THE COURT OF COMMON PLEAS
: CLEARFIELD COUNTY, PENNSYLVANIA
: NO. 06-1552-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

December 8, 2009.

Prothonotary

By: W. L. 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.: 2006-01552-CD

Real Debt: \$16,852.37

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Kevin P. Hoffman

Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: December 8, 2006

Expires: December 8, 2011

Certified from the record this 8th day of December, 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