

06-1813-CD
Citibank vs. Karen L. Wise

2006-1813-CD
Citibank vs Karen Wise

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. : IN THE COURT OF COMMON PLEAS
701 East 60th Street North, Sioux Falls, SD
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
v.
: NO. 2006-1813-C
KAREN L WISE
1040 Schuckers Orchard Road
Luthersburg PA 15848-2316
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

FILED pd \$85.00 AM
11/2/2006 10:54 AM
NOV - 3 2006
William A. Shaw
Prothonotary/Clerk of Courts

C-10604

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. : IN THE COURT OF COMMON PLEAS
701 East 60th Street North, Sioux Falls, SD
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
v. : NO.
KAREN L WISE
1040 Schuckers Orchard Road, Luthersburg PA
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 Karen L Wise, who resides at 1040 Schuckers Orchard Road, Luthersburg, 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.

Count I

4. Plaintiff furnished consumer credit to the defendant by means of a credit card with account number 5424180156939768 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 \$2,759.61 which sum reflects the Exhibit A statement balance less credits, if any, which were applied subsequent to the date of Exhibit A.

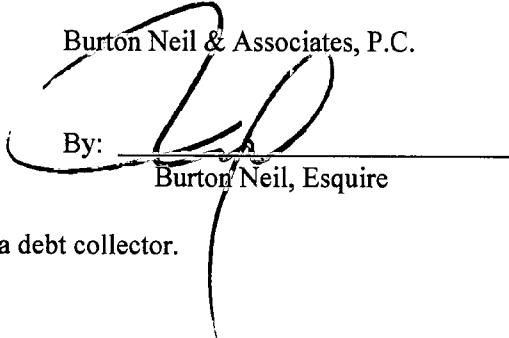
Wherefore, plaintiff demands judgment against defendant for the sum of \$2,759.61, and the costs of this action.

Count II

9. Plaintiff furnished consumer credit to the defendant by means of a(n) AT&T Universal credit card with account number 5491130006951156 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 \$18,713.40 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 \$18,713.40, 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.

09/01/06 \$2759.61 \$206.69 SITE:KC-CL TM:CO-5000 ACID:ROB0554
 PMT: PUS: DUE: NEW: BALANCE: 09/06/06 22:12:17:

KAREN L WISE
 1040 SCHUCKERS ORCHARD R
 LUTHERSBURG
 15848-2316000 PA

CITI CARDS
 PO BOX 183054
 COLUMBUS, OH
 43218-3054

1/10/04

Citi® Dividend Platinum Select® Card



Account Number
 5424 1801 5693 9768

Customer Service:

Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
\$3330	\$0	\$300	\$0	\$2759.61
Statement/ Closing Date	Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
57117 08/08/2006	\$0.00 +	\$125.79 +	\$80.90 =	\$206.69

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
8/08			Standard Purch LATE FEE - JUL PAYMENT PAST DUE 66 0000	35.00
8/08			PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000	75.90

Your account is two months past due and your credit privileges have been discontinued. Please call the toll-free number shown above, Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. If you have already sent us this payment, thank you.

EXHIBIT

A

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$2,648.71	\$35.00	\$0.00	\$75.90	\$2,759.61
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$2,648.71	\$35.00	\$0.00	\$75.90	\$2,759.61

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$2,685.30	0.08833%(D)	32.240%	32.240%
ADVANCES				
Standard Adv	\$0.00	0.08833%(D)	32.240%	32.240%

Your AT&T Universal Card Statement

July 11 - August 10, 2006



Page 1 of 3

KAREN L WISE
Account 5491 1300 0695 1156
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..... \$18,713.40
Due Date*..... September 5, 2006
*Payment must be received by 5:00 pm local time on the payment due date.
Amount Past Due..... \$1,838.01

Credit Line..... \$19,020.00
Available Credit..... \$0.00
Cash Advance Limit..... \$10,000.00
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	18,250.02
Payments and Adjustments	0.00
MasterCard® Activity	463.38
Total AT&T Services	0.00
New Balance	\$18,713.40

Note: Detailed activity starts on page 3.

C-10609

date paid amount paid check #

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

EXHIBIT B

Your Account Number			
5491 1300 0695 1156			
Please Enter Amount of Payment Enclosed			
Payment Due Date	Your Total Balance	Minimum Amount Due	\$
SEP 05 2006	\$18713.40	\$18713.40	

550N MC 32 R 1 AR7651447

.....

KAREN L WISE
1040 SCHUCKERS
ORCHARD RD
LUTHERSBURG PA 15848

.....
AT&T UNIVERSAL CARD
PO BOX 183056
COLUMBUS, OH 43218-3056
.....

KAREN L WISE
Account 5491 1300 0895 1156
July 11 - August 10, 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.**

KAREN L WISE
Account 5491 1300 0895 1166
July 11 - August 10, 2006



Page 3 of 3

AT&T UNIVERSAL MASTERCARD ACTIVITY

Purchases.....	370.31
Cash Advances and Checks.....	58.07
Fees.....	35.00
Total MasterCard Activity.....	\$463.38

PURCHASES

Total MasterCard Purchases..... \$370.31

Standard Purch

Trans	Post	Description	Amount
	08/10	PURCHASES*FINANCE CHARGE*PERIOD	370.31
Total Standard Purch			\$370.31

CASH ADVANCES

Cash Advance Limit..... \$10,000.00* *This represents a portion of your total credit line.

Total Cash Advances..... \$58.07

Standard Adv

Trans	Post	Description	Amount
	08/10	ADVANCES*FINANCE CHARGE*PERIOD	58.07
Total Standard Adv			\$58.07

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	28.240%	.07737%(D)	x 30	x \$15,954.21	= \$370.31	+ \$0.00	28.240%
CASH ADVANCES							
Standard Adv	28.240%	.07737%(D)	x 30	x \$2,502.04	= \$58.07	+ \$0.00	28.240%
					Total FINANCE CHARGE	=	\$428.38

FEES

Standard Purch

Trans	Post	Description	Amount
	08/10	LATE FEE - JUL PAYMENT PAST DUE	35.00
Total Fees			\$35.00

AT&T SERVICES SUMMARY

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

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 29, 2006

Karen L Wise
5424180156939768

Documents for Filing

OUR FILE: C-10604
DATE: October 31, 2006

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

RE: CITIBANK (SOUTH DAKOTA) N.A. v. Karen L Wise

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 # 102095
NO: 06-1813-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.

vs.

DEFENDANT: KAREN L. WISE

SHERIFF RETURN

NOW, November 08, 2006 AT 1:30 PM SERVED THE WITHIN COMPLAINT ON KAREN L. WISE DEFENDANT AT 1040 SCHUCKERS ORCHARD ROAD, LUTHERSBURG, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO GLENN QUICK, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING / COUDRIET

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	27034	10.00
SHERIFF HAWKINS	NEIL	27034	33.13

FILED
9:20AM
FEB 06 2007
[Handwritten signature]

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

____ Day of _____ 2007

So Answers,

[Handwritten signature]
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.

KAREN L WISE
1040 Schuckers Orchard Road
Luthersburg PA 15848-2316
Defendant

: NO. 2006-1813-CD

: CIVIL ACTION - LAW

Praeclipe for Default Judgment

FILED

FEB 20 2007

2/20/07

William A. Shaw
Prothonotary/Clerk of Courts

No Tice to Deft

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 - Count I:	\$2,759.61
Principal - Count II:	\$18,713.40
TOTAL	\$21,473.01

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**

C

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-10604

CITIBANK (SOUTH DAKOTA) N.A.

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

KAREN L WISE

: NO. 2006-1813-CD

Defendant

: CIVIL ACTION - LAW

Notice of Intention to File Praecipe for Default Judgment

TO: Karen L Wise
 1040 Schuckers Orchard Road
 Luthersburg PA 15848-2316

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: January 31, 2007

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. : IN THE COURT OF COMMON PLEAS
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
v. : NO. 2006-1813-CD
KAREN L WISE : CIVIL ACTION - LAW
Defendant

Rule of Civil Procedure NO. 236 (Revised)

Notice is given that a JUDGMENT in the above captioned matter has been entered against you on

FEB. 20, 2007

Prothonotary

By: 
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

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