

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. 2006-1827-CD

ROBERT H JOHNSON
84 Breezewood Avenue, Du Bois PA 158011102
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-10797

FILED pd \$85.00 A14
M/3:00pm 1cc SHF
NOV - 6 2006 (5)

William A. Shaw
Prothonotary/Clerk of Courts



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.
ROBERT H JOHNSON :
84 Breezewood Avenue, Du Bois PA 158011102
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 Robert H Johnson, who resides at 84 Breezewood Avenue, Du Bois, 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 5424180461849561 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 \$11,380.66 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 \$11,380.66, 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.

10/06/06 \$11380.66 \$11380.66

SITE:KC-CL

TM:CO-5000

ACID:ROB0554

PM DUE DATE

NEW BALANCE

MIN AMT DUE

10/03/06

21:52:07:

ROBERT H JOHNSON
84 BREEZEWOOD AVE
DU BOIS
15801-1102000

PA

CITI CARDS
PO BOX 183058
COLUMBUS, OH
43218-3058

Citi® Driver's Edge® Platinum Select® Card-Charter Rbts

Account Number

5424 1804 6184 9561

**Customer Service:**

1-800-925-8871

BOX 6500

SIOUX FALLS, SD

57117

Total Credit Line

\$24200

Available Credit Line

\$0

Cash Advance Limit

\$10400

Available Cash Limit

\$0

New Balance

\$11380.66

Statement/
Closing Date

09/13/2006

Amount Over
Credit Line

\$0.00

Past Due

\$2824.78

Purch/Adv
Minimum Due

\$410.49

Minimum
Amount Due

\$11380.66

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	9/13		Standard Purch PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000	276.92 0000000000
	9/13		Balance Transfer - Charged To Offer 8 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000	20.57 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.

EXHIBIT A

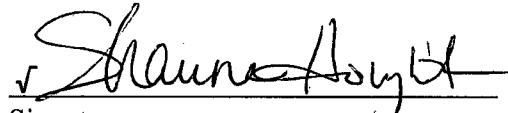
Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$11,083.17	\$0.00	\$0.00	\$297.49	\$11,380.66
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$11,083.17	\$0.00	\$0.00	\$297.49	\$11,380.66

Days This Billing Period: 30

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$10,450.02	0.08833%(D)	32.240%	32.240%
Offer 8	\$776.28	0.08833%(D)	32.240%	32.240%
ADVANCES				
Standard Adv	\$0.00	0.08833%(D)	32.240%	32.240%

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.


Signature **Shauna Houghton**

Robert H Johnson
5424180461849561

Documents for Filing

OUR FILE: C-10797
DATE: November 1, 2006

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

RE: CITIBANK (SOUTH DAKOTA) N.A. v. Robert H Johnson

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 # 102103
NO: 06-1827-CD
SERVICE # 1 OF 1
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.
vs.
DEFENDANT: ROBERT H. JOHNSON

SHERIFF RETURN

NOW, November 21, 2006 AT 1:54 PM SERVED THE WITHIN COMPLAINT ON ROBERT H. JOHNSON
DEFENDANT AT Meeting place: DRMC WEST PARKING LOT, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA,
BY HANDING TO ROBERT JOHNSON, DEFENDANT 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	27118	10.00
SHERIFF HAWKINS	NEIL	27118	51.82

FILED
9/2:15 Lm (im)
FEB 08 2007

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2007

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

v.

: NO. 2006-1827-CD

ROBERT H JOHNSON
84 Breezewood Avenue
Du Bois PA 158011102
Defendant

: CIVIL ACTION - LAW

FILED

FEB 20 2007

William A. Shaw
Prothonotary/Clerk of Courts

NOTICE TO DEPT.

Praeceptum for Default Judgment

To the Prothonotary:

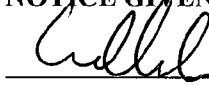
Please enter judgment by default for want of an answer in the above case in favor of the plaintiff and against the defendant, and assess damages as follows:

Principal:	\$11,380.66
TOTAL	\$11,380.66

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 P.A.R.CIV.P. 236**


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-10797



CITIBANK (SOUTH DAKOTA) N.A.

: IN THE COURT OF COMMON PLEAS

C-10797

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO. 2006-1827-CD

ROBERT H JOHNSON

Defendant

: CIVIL ACTION - LAW

Notice of Intention to File Praecipe for Default Judgment

TO: Robert H Johnson
84 Breezewood Avenue
Du Bois PA 158011102

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: 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.
Plaintiff

v.

ROBERT H JOHNSON
Defendant

: IN THE COURT OF COMMON PLEAS
:
: CLEARFIELD COUNTY, PENNSYLVANIA
:
: NO. 2006-1827-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

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

The law firm of Burton Neil & Associates 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

FILED No cc
AUG 18 2011
William A. Shaw
Prothonotary/Clerk of Courts
7.00

CITIBANK (SOUTH DAKOTA) N.A. : IN THE COURT OF COMMON PLEAS
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
v.
ROBERT H JOHNSON : NO. 2006-1827-CD
Defendant : CIVIL ACTION - LAW

Praecepte 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-10797