

07-2132-CD

Citibank vs Jeffrey Crosbie

FILED

DEC 31 2007

W 11240/um

William A. Shaw

Prothonotary/Clerk of Courts

1 copy to Shpn

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

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

JEFFREY CROSBIE
873 Treasure Lake, Du Bois PA 15801

: NO. 2007-2132-C-D

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. Meholic0.

Court Administrator

Clearfield County Courthouse

Clearfield, PA 16830

Telephone No. 814-765-2641 Ext. 5982

C-9146



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 N
Sioux Falls, SD 57117

Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO.

JEFFREY CROSBIE
873 Treasure Lake, Du Bois PA 15801

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 Jeffrey Crosbie, who resides at 873 Treasure Lake, DuBois, 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 5424180134327920 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 \$8,986.38 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 \$8,986.38, and the costs of this action.

Burton Neil & Associates, P.C.

By: 

Burton Neil, Esquire
Attorney for Plaintiff

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

C-9146

10/17/05 \$8986.38 \$1728.96

SITE:KC-CL TM:CO-5000 ACID:KCB3104
02/22/06 22:58:30:

JEFFREY CROSBIE
150 JEFFERSON AVE
VANDERGRIFT
15690-1107000

PA

CITI CARDS
PO BOX 183065
COLUMBUS, OH
43218-3065

Citi® Platinum Select® Card



Account Number
5424 1801 3432 7920

Customer Service:

Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
\$8360	\$0	\$3000	\$0	\$8986.38
Statement/ Closing Date	Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
572117 09/22/2005	\$626.38 +	\$792.15 +	\$310.43 =	\$1728.96

Sub Date	Post Date	Reference Number	Activity Since Last Statement	Amount
9/22			Standard Purch OVER CREDIT LIMIT FEE	35.00
9/22			62 0000 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000	5.87
9/22			Purch/Adv Thru 05/21/2004 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000	215.56

Your account is seriously past due and your credit privileges have been suspended. Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am - 9 pm, or Saturday, 8 am - 5 pm, Central Time.

EXHIBIT A

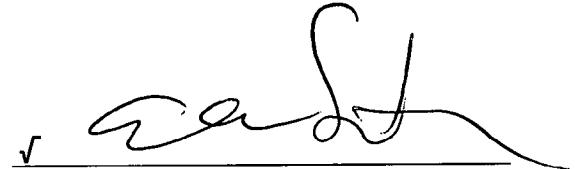
Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(-) New Balance
PURCHASES	\$8,729.95	\$35.00	\$0.00	\$221.43	\$8,986.38
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$8,729.95	\$35.00	\$0.00	\$221.43	\$8,986.38

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE	Days This Billing Period: 30
PURCHASES					
Standard Purch	\$234.41	0.08353%(D)	30.490%	30.490%	
Purch/Adv thru 05/21/2004	\$8,602.11	0.08353%(D)	30.490%	30.490%	
ADVANCES					
Standard Adv	\$0.00	0.08353%(D)	30.490%	30.490%	

Verification

ERICKA SMITH

I, ERICKA SMITH 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

Jeffrey Crosbie
5424180134327920

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CITIBANK (SOUTH DAKOTA) N.A.
701 East 60th Street N
Sioux Falls, SD 57117

Plaintiff(s)

v.

JEFFREY CROSBIE
873 Treasure Lake
Du Bois PA 15801

Defendant(s)

CIVIL DIVISION, ARBITRATION
AND STATUTORY APPEALS ONLY

CASE NO. 2007-2132-CD

TYPE OF PLEADING: Praecipe

CODE AND CLASSIFICATION:

FILED ON BEHALF OF: Plaintiff
CITIBANK (SOUTH DAKOTA) N.A.
(Name of Party, indicate plaintiff or defendant)

NAME, ADDRESS AND TELEPHONE OF:

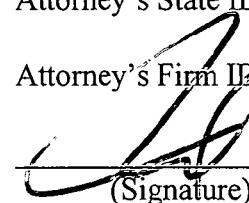
Counsel of Record
 Individual, if pro se

Burton Neil, Esquire
Burton Neil & Associates, P.C.
1060 Andrew Drive, Suite 170
West Chester, PA 19380
Telephone: 610-696-2120

email: litigation@burt-law.com

Attorney's State ID# 11348

Attorney's Firm ID# 1


(Signature)

FILED ICC & Cert
m/11/08 LM
of disc issued
to Atty Neil
APR 9 2008

William A. Shaw
Prothonotary/Clerk of Courts

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 : IN THE COURT OF COMMON PLEAS
v. : CLEARFIELD COUNTY, PENNSYLVANIA
JEFFREY CROSBIE : NO. 2007-2132-CD
Defendant : CIVIL ACTION - LAW

Praecipe to Discontinue

To the Prothonotary:

Kindly discontinue the above-captioned action without prejudice.

Burton Neil & Associates, P.C.

By: 

Burton Neil, Esquire
Attorney for Plaintiff

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

C-9146

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

Citibank (South Dakota) N.A.

Vs. No. 2007-02132-CD
Jeffrey Crosbie

CERTIFICATE OF DISCONTINUATION

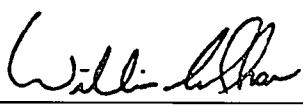
Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on April 9, 2008, marked:

Discontinued without prejudice

Record costs in the sum of \$85.00 have been paid in full by Burton Neil & Associates.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 9th day of April A.D. 2008.



William A. Shaw, Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # **103603**

CITIBANK (SOUTH DAKOTA) NA

vs.

JEFFREY CROSBIE

TYPE OF SERVICE COMPLAINT

SHERIFF RETURNS

NOW May 05, 2008 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO JEFFREY CROSBIE, DEFENDANT. DEFENDANT UNKNOWN AT TREASURE LAKE.

SERVED BY: /

Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	NEIL	36259	10.00
SHERIFF HAWKINS	NEIL	36259	33.19

Sworn to Before me This

____ Day of _____ 2008

So Answers,

*Chester A. Hawkins
by Marilyn Harris*
Chester A. Hawkins
Sheriff

FILED

03:15 CM
MAY 05 2008

William A. Shaw
Prothonotary/Clerk of Courts

I hereby certify this to be true and
attested copy of the original
statement filed in this case.

DEC 31 2007

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

Plaintiff : IN THE COURT OF COMMON PLEAS

v.

JEFFREY CROSBIE
873 Treasure Lake, Du Bois PA 15801

Defendant : CIVIL ACTION - LAW

: NO. 2007-2132-C0

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.

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LAWYER REFERENCE AND INFORMATION SERVICE

David S. Meholic0.

Court Administrator

Clearfield County Courthouse

Clearfield, PA 16830

Telephone No. 814-765-2641 Ext. 5982

C-9146



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Attorney for Plaintiff

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Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA

v.

: NO.

JEFFREY CROSBIE
873 Treasure Lake, Du Bois PA 15801

Defendant : CIVIL ACTION - LAW

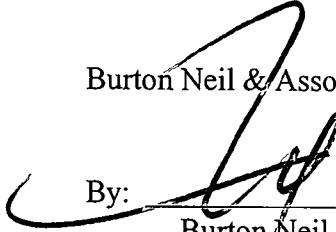
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6. Plaintiff mailed to defendant monthly statements for the account including the billing statement attached hereto as Exhibit A. The monthly statements accurately stated the previous balance, the debits and credits to the account for the prior billing 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 \$8,986.38 which sum reflects the Exhibit A statement balance less credits, if any, which were applied subsequent to the date of Exhibit A.

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Burton Neil & Associates, P.C.

By: 

Burton Neil, Esquire
Attorney for Plaintiff

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

THE SIGNATURE ABOVE CERTIFIES THAT THIS IS A
TRUE AND CORRECT COPY OF THE ORIGINAL FILE IN THIS CAUSE.

10/17/05 \$8986.38 \$1728.96

C-9146
SITE:KC-CL TM:CO-5000 ACID:KCB3104
02/22/06 22:58:30:JEFFREY CROSBIE
150 JEFFERSON AVE
VANDERGRIFT
15690-1107000

PA

CITI CARDS
PO BOX 183065
COLUMBUS, OH
43218-3065

Citi® Platinum Select® Card

Account Number
5424 1801 3432 7920

Customer Service

1-800-950-5184

BOX 6500

SIOUX FALLS, SD

57117

Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
\$8360	\$0	\$3000	\$0	\$8986.38
Statement/Closed Date	Amount Over Credit Line	Post Due	Perch/Adv Minimum Due	Minimum Amount Due
09/22/2005	\$626.38 +	\$792.15 +	\$310.43 =	\$1728.96

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EXHIBIT

A

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ERICKA SMITH

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A handwritten signature in black ink, appearing to read "A. S. Adams".

Jeffrey Crosbie
5424180134327920