

08-117-CD  
Citibank vs Amadeus Finley

FILED *Atty pd. 95.00*  
JAN 24 2008 *CC Sheriff*

William A. Shaw  
Prothonotary/Clerk of Courts

Burton Neil & Associates, P.C.  
By: Brit J. Suttell, Esquire ID. NO. 204140  
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.

AMADEUS M FINLEY  
713 Treasure Lake, Du Bois PA 15801-9014  
Defendant

: NO. *08-117-CD*  
: 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-12994



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By: Brit J. Suttell, Esquire ID. NO. 204140  
1060 Andrew Drive, Suite 170  
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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.

AMADEUS M FINLEY  
713 Treasure Lake, Du Bois PA 15801-9014

Defendant : CIVIL ACTION - LAW

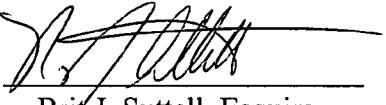
**Complaint**

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 Amadeus M Finley, who resides at 713 Treasure Lake, 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 5424180819674257 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 \$17,369.15 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 \$17,369.15, and the costs of this action.

Burton Neil & Associates, P.C.

By: 

Brij J. Suttell, Esquire  
Attorney for Plaintiff

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

09/07/07 \$17369.15 \$17369.15

SITE:KC-CL TM:CO-5000 ACID:KCB3104  
10/24/07 22:24:08

PMT DUE DATE NEW BALANCE MIN AMT DUE

AMADEUS M FINLEY  
713 TREASURE LK  
DU BOIS  
15801-9019000

PA

CITI CARDS  
PO BOX 183059  
COLUMBUS, OH  
43218-3059

C-12944

## Citi® Dividend Platinum Select® Card

Account Number  
5424 1808 1967 4257

## Customer Service:

	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
1-800-866-9900	\$15700	\$0	\$9400	\$0	\$17369.15
BOX 6500 SIOUX FALLS, SD 57117	Statement/ Closing Date 08/14/2007	Amount Over Credit Line \$1669.15	Past Due \$1765.13	Purch/Adv Minimum Due \$694.79	Minimum Amount Due \$17369.15

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
8/14			Standard Purch LATE FEE - JUL PAYMENT PAST DUE 66 0000 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000	39.00 0000000000 135.49 0000000000
8/14			Balance Transfer - Charged To Offer 4 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000	298.71 0000000000
8/14			Balance Transfer - Charged To Offer 5 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000	48.59 0000000000

Your late fee was based on your account balance as of the payment due date (08/07/07), which was \$16,847.36.

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	\$16,847.36	\$39.00	\$0.00	\$482.79	\$17,369.15
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$16,847.36	\$39.00	\$0.00	\$482.79	\$17,369.15

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$4,793.33	0.08833%(D)	32.240%	32.240%
Offer 4	\$10,567.82	0.08833%(D)	32.240%	32.240%
Offer 5	\$1,718.92	0.08833%(D)	32.240%	32.240%
ADVANCES				
Standard Adv	\$0.00	0.08833%(D)	32.240%	32.240%

EXHIBIT

A

## Verification

Shauna Houghton

I, \_\_\_\_\_ 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 on its behalf. 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.

✓ Shauna Houghton

Signature

Shauna Houghton

Amadeus M Finley  
5424180819674257

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103672  
NO: 08-117-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.  
vs.  
DEFENDANT: AMADEUS M. FINLEY

**SHERIFF RETURN**

NOW, February 21, 2008 AT 2:58 PM SERVED THE WITHIN COMPLAINT ON AMADEUS M. FINLEY DEFENDANT AT RESIDENCE 713 TREASURE LAKE, BAY ROAD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO AMADEUS FINLEY, 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	036703	10.00
SHERIFF HAWKINS	NEIL	036703	75.57

**FILED**

03/20/08  
MAY 16 2008

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

\_\_\_\_ Day of \_\_\_\_\_ 2008

So Answers,

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

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.

AMADEUS M FINLEY  
713 Treasure Lake  
Du Bois PA 15801-9014

Defendant(s)

CIVIL DIVISION, ARBITRATION  
AND STATUTORY APPEALS ONLY

CASE NO. 08-117-CD

TYPE OF PLEADING: \_\_\_\_\_

Praecipe for Default Judgment

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:

X Counsel of Record  
\_\_\_\_ Individual, if pro se

Brit J. Suttell, 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# 204140

Attorney's Firm ID# \_\_\_\_\_

\_\_\_\_\_  
(Signature)

**FILED** Atty pd. # 2000  
MAY 13 2008 Notice to Def.  
MAY 27 2008 Statement to

William A. Shaw  
Prothonotary/Clerk of Courts

Atty  
60

Burton Neil & Associates, P.C.  
By: Brit J. Suttell, Esquire ID. NO. 204140  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
610-696-2120  
Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA), N.A.

COPY

: IN THE COURT OF COMMON PLEAS

Plaintiff

: CLEARFIELD COUNTY, PENNSYLVANIA

v.

AMADEUS M FINLEY

Defendant

: NO. 08-117-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 May 27, 2008.

Prothonotary

By: W.H. Shan

Deputy

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

Brit J. Suttell, 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

COPY

Citibank (South Dakota), N.A.  
Plaintiff(s)

No.: 2008-00117-CD

Real Debt: \$17,369.15

Atty's Comm: \$

Vs. Costs: \$

Int. From: \$

Amadeus M. Finley  
Defendant(s)

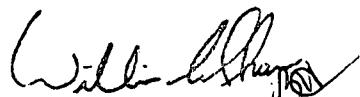
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: May 27, 2008

Expires: May 27, 2013

Certified from the record this 27th day of May, 2008.



\_\_\_\_\_  
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