

08-980-CD

Citibank vs Bille J. Verbeck

FILED *Atty pd \$95.00*  
*mla:2964*  
**MAY 27 2008** *cc Sheriff*  
William A. Shaw  
Prothonotary/Clerk of Courts

Burton Neil & Associates, P.C.  
By: Edward J. O'Brien, Esquire ID. NO. 32985  
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.

BILLIE J VERBECK : NO. *08-980-CD*  
372 Miller Road Ext, Houtzdale PA 16651-9558  
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

Burton Neil & Associates, P.C.

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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.

BILLIE J VERBECK

372 Miller Road Ext, Houtzdale PA 16651

Defendant : CIVIL ACTION - LAW

**Complaint**

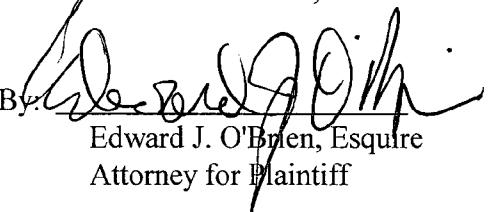
1. Plaintiff is CITIBANK (SOUTH DAKOTA), N.A., with place of business located at 701 East 60th Street North, Sioux Falls, South Dakota.
2. Defendant is Billie J Verbeck, who resides at 372 Miller Road Ext, Houtzdale, Clearfield County, Pennsylvania.
3. Plaintiff is a national banking association, engaged 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(n) Key Bank credit card with account number 5466480007316227 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 \$2,184.15 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 \$2,184.15, and the costs of this action.

Burton Neil & Associates, P.C.

By:

  
Edward J. O'Brien, Esquire  
Attorney for Plaintiff

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

04/11/08 \$2184.15 \$2184.15 SITE:KC-CL TM:CO-5000 ACID:KCB0201  
 PMT DUE DATE: NEW BALANCE MIN AMT DUE: 04/23/08 22:45:26:

BILLIE J VERBECK  
 372 MILLER RD EXT  
 HOUTZDALE  
 16651-9558000

PA

KeyBank  
 PO BOX 183062  
 COLUMBUS, OH  
 43218-3062

0-157841

## Platinum MasterCard®



Account Number  
 5466 4800 0731 6227

Customer Service:

1-800-444-4539	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
PO BOX 142319 IRVING, TX 75014-2319	\$2000	\$0	\$1400	\$0	\$2184.15
	Statement/ Closing Date	Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
	03/18/2008	\$184.15	\$540.60	\$110.20	\$2184.15

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	3/03	86899079	Payments, Credits & Adjustments PAYMENT THANK YOU 70 0000 0 0	-50.00 700000000000
	3/18		Standard Purch LATE FEE - FEB PAYMENT PAST DUE 66 0000 0	39.00 700000000000
	3/18		OVER CREDIT LIMIT FEE 62 0000 0	35.00 700000000000
	3/18		PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	5.70 700000000000
	3/18		Purch/Adv Thru 03/19/2007 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	44.50 700000000000

Your late fee was based on your account balance as of the payment due date (03/12/08), which was \$2,059.95.

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	\$2,109.95	\$74.00	\$50.00	\$50.20	\$2,184.15
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$2,109.95	\$74.00	\$50.00	\$50.20	\$2,184.15

Days This Billing Period: 29

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$239.05	0.08216%(D)	29.990%	29.990%
Purch/Adv thru 03/19/2007	\$1,867.59	0.08216%(D)	29.990%	29.990%
ADVANCES				
Standard Adv	\$0.00	0.08216%(D)	29.990%	29.990%

EXHIBIT A

## 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 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

Billie J Verbeck  
5466480007316227

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
NO: 08-980-CD

CITIBANK (SOUTH DAKOTA) N.A.

VS  
BILLIE J. VERBECK

COMPLAINT

SERVE BY: 06/26/2008

HEARING:

PAGE: 104216

SERVICE # 1 OF 1

**FILED**

08:39 a.m. CL  
JUN 05 2008 NO CC

William A. Shaw  
Prothonotary/Clerk of Courts

DEFENDANT: BILLIE J. VERBECK  
ADDRESS: 372 MILLER ROAD EXT.  
HOOTZDALE, PA 16651

ALTERNATE ADDRESS

*222 Clearfield ST.  
WALLACE TOWN, PA*

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

**SHERIFF'S RETURN**

NOW, 6-4-08 AT 2:15 AM / PM SERVED THE WITHIN

COMPLAINT ON BILLIE J. VERBECK, DEFENDANT

BY HANDING TO BILLIE J. VERBECK Def.

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM (HER) THE CONTENTS THEREOF.

ADDRESS SERVED 222 Clearfield ST.  
WALLACE TOWN, PA.

NOW \_\_\_\_\_ AT \_\_\_\_\_ AM / PM POSTED THE WITHIN

COMPLAINT FOR BILLIE J. VERBECK

AT (ADDRESS) \_\_\_\_\_

NOW \_\_\_\_\_ AT \_\_\_\_\_ AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO BILLIE J. VERBECK

REASON UNABLE TO LOCATE \_\_\_\_\_

SWORN TO BEFORE ME THIS

\_\_\_\_\_  
\_\_\_\_\_  
DAY OF \_\_\_\_\_ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

James E. Davis  
Deputy Signature

James E. Davis  
Print Deputy Name

Burton Neil & Associates, P.C.  
By: Edward J. O'Brien, Esquire ID. NO. 32985  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
610-696-2120

Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA), N.A.  
Plaintiff

v.

BILLIE J VERBECK  
Defendant

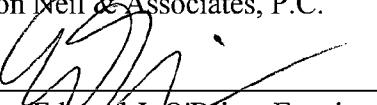
: IN THE COURT OF COMMON PLEAS  
: CLEARFIELD COUNTY, PENNSYLVANIA  
: NO. 08-980-CD  
: CIVIL ACTION - LAW

**Praecipe to Settle, End, & Discontinue**

To the Prothonotary:

Mark the above matter Settled, Ended and Discontinued.

Burton Neil & Associates, P.C.

By: 

Edward J. O'Brien, Esquire  
Attorney for Plaintiff

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

C-15841

FILED <sup>ICC & COA</sup>  
m 11:30am issued to  
JUN 23 2008 ATTY O'Brien  
WM  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

*COPY*

Citibank (South Dakota), N.A.

Vs. No. 2008-00980-CD  
Billie J. Verbeck

**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 June 23, 2008, marked:

Settled, ended and discontinued

Record costs in the sum of \$95.00 have been paid in full by Burton Neil & Associates, PC.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 23rd day of June A.D. 2008.



*cm*

\_\_\_\_\_  
William A. Shaw, Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104216  
NO: 08-980-CD  
SERVICES 1  
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.

vs.

DEFENDANT: BILLIE J. VERBECK

**SHERIFF RETURN**

---

**RETURN COSTS**

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	NEIL	041699	10.00
SHERIFF HAWKINS	NEIL	041699	28.10

FILED  
013-0761  
SEP 25 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

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



Chester A. Hawkins  
Sheriff