

08-1710-CD  
Citibank vs Ashley Cook et al

Ad \$95.00 Atty  
FILED  
m/12:12cm ICC Shft  
SEP 11 2008

Burton Neil & Associates, P.C.  
By: Derek C. Blasker, Esquire ID. NO. 202150  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
(610) 696-2120  
Attorney for Plaintiff

William A. Shaw  
Prothonotary/Clerk of Courts

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.

ASHLEY COOK DBA ABCOOK & SON : NO. 2008-1710-CD  
1 Long Run Road, Mineral Springs PA 16855-0060  
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      November 10, 2008 Document  
Clearfield, PA 16830      Reinstated/Reissued to Sheriff/Attorney  
Telephone No. 814-765-2641 Ext. 5982      for service.

William A. Shaw  
Deputy Prothonotary

C-16590

Burton Neil & Associates, P.C.  
By: Derek C. Blasker, Esquire ID. NO. 202150  
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.

ASHLEY COOK DBA ABCOOK & SON  
1 Long Run Road, Mineral Springs PA 16855-0060  
Defendant : CIVIL ACTION - LAW

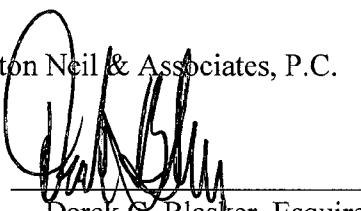
### **Complaint**

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 Ashley Cook dba ABCook & Son, who resides at 1 Long Run Road, Mineral Springs, Clearfield County, Pennsylvania.
3. Plaintiff is a national banking association, engaged in various types of banking business including lending through the issuance of credit cards.
4. Plaintiff furnished credit to the defendant by means of a(n) CitiBusiness credit card with account number ending in 3184 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 \$5,375.83 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 \$5,375.83, and the costs of this action.

Burton Neil & Associates, P.C.

By: 

Derek C. Blasker, Esquire  
Attorney for Plaintiff

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

# CitiBusiness® Platinum Select® Card

Page 1 of 2

## Account Summary Statement

ASHLEY COOK  
ABCOOK AND SON  
Business Account 5 [REDACTED] 3184  
Total Cardmembers: 0  
March 3 - April 1, 2008

## QUICK REFERENCE

Minimum Payment	\$5,375.83
New Balance	\$5,375.83
Due Date*	04/28/08
*Payment must be received by 5:00 pm local time on the Payment Due Date	
Past Due	\$1,448.93
Amount Over Limit	\$375.83

Business Credit Line	\$5,000
Available Credit	\$0
Cash Advance Line	\$2,500
Available Cash Advance	\$0

## How To Reach Us

Visit [cards.com](http://cards.com)  
Customer Service:  
1-800-750-7453 or write to  
CitiBusiness Card, P.O. Box 44180  
Jacksonville, FL 32231-4180

(-10590)

## NEWS FROM CITI

Your account has been  
permanently closed. Remit the  
past due amount of \$1,448.93  
immediately.

## ACCOUNT SUMMARY

Previous Balance.....	\$5,218.23
Payments, Credits and Adjustments.....	\$0.00
Purchases.....	\$0.00
Cash Advances.....	\$0.00
Finance Charges.....	\$122.60
Fees.....	\$35.00
New Balance.....	\$5,375.83

## MONTHLY ACTIVITY BY CATEGORY

Miscellaneous.....	\$157.60
--------------------	----------

Detach and follow payment instructions on reverse side.

05082290019653184537583999995617

Business Account Number

[REDACTED] 3184

Please Enter Amount of Payment Enclosed

Payment Due	New Balance	Minimum Payment	
04/28/08	\$5,375.83	\$5,375.83	\$

265N BM 32 A 1 CR8501505

ASHLEY COOK  
ABCOOK AND SON  
P.O. BOX 60  
MINERAL SPRINGS PA 16855-0060

( ) New Home Phone ( ) New Business Phone

PRINT changes of address, phone number or name above.

CITIBUSINESS CARD  
PO BOX 183051  
COLUMBUS, OH 43218-3051

\* If you provide an e-mail address, we may use it to contact you about your account. We may also use your e-mail address to send you information about products and services you might find useful.

EXHIBIT

A

ASHLEY COOK  
ABCOOK AND SON  
Business Account 3184  
March 3 - April 1, 2008

Page 2 of 2

**BUSINESS ACCOUNT SUMMARY**  
**Business Activity**

**Purchases**

Standard Purch	Trans	Post	Description	Amount
		04/01	PURCHASES*FINANCE CHARGE*PERIODIC RATE	\$122.60
<b>Total Standard Purch</b>				<b>\$122.60</b>

**Business Fees**

Standard Purch	Trans	Post	Description	Amount
		04/01	OVER CREDIT LIMIT FEE	\$35.00
<b>Total Standard Purch</b>				<b>\$35.00</b>

**Finance Charge Summary**

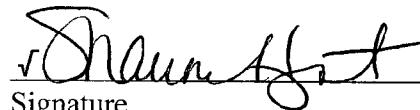
	Nominal APR	Periodic FINANCE CHARGE	Transaction Fee/FINANCE CHARGE
PURCHASES Standard Purch	29.240%	\$122.60	\$0.00
CASH ADVANCES Standard Adv	29.240%	\$0.00	\$0.00

**Total FINANCE CHARGE** **\$122.60**

## Verification

Shauna Houghton

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.



Signature

**C-16590**

Ashley Cook

Account number ending in 3184  
1023

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
NO: 08-1710-CD

CITIBANK (SOUTH DAKOTA) N.A.

vs

ASHLEY COOK dba ABCOOK & SON

COMPLAINT

SERVICE # 1 OF 1

SERVE BY: 10/11/2008

HEARING:

PAGE: 104649

DEFENDANT: ASHLEY COOK dba ABCOOK & SON

ADDRESS: 1 LONG RUN ROAD

MINERAL SPRINGS, PA 16855

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

ATTEMPTS

OCCUPIED

CAN't get into the Road

*01/21/2008*  
S FILED  
OCT 10 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

**SHERIFF'S RETURN**

NOW, \_\_\_\_\_ AT \_\_\_\_\_ AM / PM SERVED THE WITHIN

COMPLAINT ON ASHLEY COOK dba ABCOOK & SON, DEFENDANT

BY HANDING TO \_\_\_\_\_ / \_\_\_\_\_

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

ADDRESS SERVED \_\_\_\_\_

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

COMPLAINT FOR ASHLEY COOK dba ABCOOK & SON

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

NOW this 10th day Oct 2008 AT 8:10 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF NOT FOUND AS TO ASHLEY COOK dba ABCOOK & SON

REASON UNABLE TO LOCATE UNABLE to gain ACCESS Road is to Bad

SWORN TO BEFORE ME THIS

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

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

*George J. DeHaen*  
Deputy Signature

*George F. DeHaen*  
Print Deputy Name

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

SEP 11 2008

Burton Neil & Associates, P.C.

By: Derek C. Blasker, Esquire ID. NO. 202150  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
(610) 696-2120

Attorney for Plaintiff

Attest.

*William A. Blasker*  
Prothonotary/  
Clerk of Courts

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.

ASHLEY COOK DBA ABCOOK & SON : NO.  
1 Long Run Road, Mineral Springs PA 16855-0060

Defendant : CIVIL ACTION - LAW

2008-1710-CJ

#### 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. Meholic

Court Administrator

Clearfield County Courthouse

Clearfield, PA 16830

Telephone No. 814-765-2641 Ext. 5982

C-16590

Burton Neil & Associates, P.C.  
By: Derek C. Blasker, Esquire ID. NO. 202150  
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.

ASHLEY COOK DBA ABCOOK & SON  
1 Long Run Road, Mineral Springs PA 16855-0060

Defendant : CIVIL ACTION - LAW

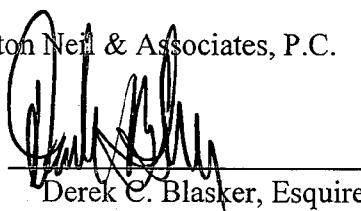
**Complaint**

1. Plaintiff is CITIBANK (SOUTH DAKOTA), N.A., with place of business located at 701 East 60th Street North, Sioux Falls, South Dakota.
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4. Plaintiff furnished credit to the defendant by means of a(n) CitiBusiness credit card with account number ending in 3184 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 \$5,375.83 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 \$5,375.83, and the costs of this action.

Burton Neil & Associates, P.C.

By: 

Derek C. Blasker, 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 ACCURATE COPY OF THE ORIGINAL FILE IN THIS CAUSE.

# CitiBusiness® Platinum Select® Card

## Account Summary Statement

ASHLEY COOK  
ABCOOK AND SON  
Business Account 5 [REDACTED] 3184  
Total Cardmembers: 0  
March 3 - April 1, 2008

### QUICK REFERENCE

Minimum Payment	\$5,375.83
New Balance	\$5,375.83
Due Date*	04/28/08

\*Payment must be received by 5:00 pm local time on the Payment Due Date

Past Due	\$1,448.93
Amount Over Limit	\$375.83

Business Credit Line	\$5,000
Available Credit	\$0
Cash Advance Line	\$2,500
Available Cash Advance	\$0

### ACCOUNT SUMMARY

Previous Balance.....	\$5,218.23
Payments, Credits and Adjustments.....	\$0.00
Purchases.....	\$0.00
Cash Advances.....	\$0.00
Finance Charges.....	\$122.60
Fees.....	\$35.00
New Balance.....	<b>\$5,375.83</b>

### MONTHLY ACTIVITY BY CATEGORY

Miscellaneous.....	\$157.60
--------------------	----------

### How To Reach Us

Visit [cards.com](http://cards.com)  
Customer Service:  
1-800-750-7453 or write to  
CitiBusiness Card, P.O. Box 44180  
Jacksonville, FL 32231-4180

(-16890)

### NEWS FROM CITI

Your account has been  
permanently closed. Remit the  
past due amount of \$1,448.93  
immediately.

Detach and follow payment instructions on reverse side.

05082290019653184537583999995617

Business Account Number		
[REDACTED] 3184		
Please Enter Amount of Payment Enclosed		
\$ [REDACTED]		

Payment Due	New Balance	Minimum Payment
04/28/08	\$5,375.83	\$5,375.83

265N BM 32 A 1 CR8501505

XXXXXXXXXXXXXXXXXXXXXXXXXXXX

ASHLEY COOK  
ABCOOK AND SON  
P.O. BOX 60  
MINERAL SPRINGS PA 16855-0060

XXXXXXXXXXXXXXXXXXXXXXXXXXXX

CITIBUSINESS CARD  
PO BOX 183051  
COLUMBUS, OH 43218-3051

XXXXXXXXXXXXXXXXXXXXXXXXXXXX

If you provide an e-mail address, we may use it to contact you about your account. We may also use your e-mail address to send you information about products and services you might find useful.

( ) New Home Phone ( ) New Business Phone

Print changes or address, phone number or email above.

EXHIBIT

A

ASHLEY COOK  
ABCOOK AND SON  
Business Account 3184  
March 3 - April 1, 2008

Page 2 of 2

**BUSINESS ACCOUNT SUMMARY**  
**Business Activity**

**Purchases**

Standard Purch	Trans	Post	Description	Amount
		04/01	PURCHASES*FINANCE CHARGE*PERIODIC RATE	\$122.60
<b>Total Standard Purch</b>				<b>\$122.60</b>

**Business Fees**

Standard Purch	Trans	Post	Description	Amount
		04/01	OVER CREDIT LIMIT FEE	\$35.00
<b>Total Standard Purch</b>				<b>\$35.00</b>

**Finance Charge Summary**

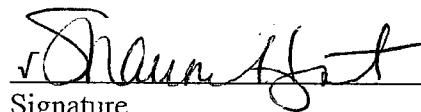
	Nominal APR	Periodic FINANCE CHARGE	Transaction Fee/FINANCE CHARGE
PURCHASES Standard Purch	29.240%	\$122.60	\$0.00
CASH ADVANCES Standard Adv	29.240%	\$0.00	\$0.00

**Total FINANCE CHARGE** **\$122.60**

### 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.



Signature

**C-16590**

Ashley Cook

Account number ending in 3184

1023

**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.

ASHLEY COOK  
1 Long Run Road  
Mineral Springs PA 16855-0060

Defendant(s)

CIVIL DIVISION, ARBITRATION  
AND STATUTORY APPEALS ONLY

CASE NO. 2008-1710-CD

TYPE OF PLEADING: Praeclipe

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

Derek C. Blasker, 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# 202150

Attorney's Firm ID#       

(Signature)

*S*  
**FILED** pd \$7.00 Atty  
M 12:14 pm ICC Atty  
NOV 10 2008

*W.A. Shaffer*  
William A. Shaffer  
Prothonotary/Clerk of Courts  
Reinstated  
Complaint to Shaffer

Burton Neil & Associates, P.C.  
By: Derek C. Blasker, Esquire ID. NO. 202150  
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  
ASHLEY COOK : NO. 2008-1710-CD  
1 Long Run Road, Mineral Springs PA 16855-0060  
Defendant : CIVIL ACTION - LAW

**Praecipe to Reinstate**

To the Prothonotary:

Please reinstate the Complaint.

Burton Neil & Associates, P.C.

By: \_\_\_\_\_

Derek C. Blasker, Esquire  
Attorney for Plaintiff

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

C-16590

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
NO: 08-1710-CD

CITIBANK (SOUTH DAKOTA), N.A.

vs

ASHLEY COOK DBA ABCOOK & SON  
COMPLAINT

SERVICE # 1 OF 1

SERVE BY: 12/10/2008 HEARING: PAGE: 104908

DEFENDANT: ASHLEY COOK DBA ABCOOK & SON  
ADDRESS: 1 LONG RUN ROAD  
MINERAL SPRINGS, PA 16855--0060

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/PIC

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

ATTEMPTS

12/3/08

No Such address per 911

5  
FILED  
03:40pm  
DEC 10 2008  
S

William A. Shaw  
Prothonotary/Clerk of Courts  
OCCUPIED

**SHERIFF'S RETURN**

NOW, \_\_\_\_\_ AT \_\_\_\_\_ AM / PM SERVED THE WITHIN

COMPLAINT ON ASHLEY COOK DBA ABCOOK & SON, DEFENDANT

BY HANDING TO \_\_\_\_\_ / \_\_\_\_\_

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

ADDRESS SERVED \_\_\_\_\_

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

COMPLAINT FOR ASHLEY COOK DBA ABCOOK & SON

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

NOW 12-10-08 AT 3:30 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO ASHLEY COOK DBA ABCOOK & SON

REASON UNABLE TO LOCATE No such address

SWORN TO BEFORE ME THIS

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

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy S. Hunter  
Deputy Signature

S. Hunter  
Print Deputy Name

FILED

SEP 10 2008

William A. Shaw  
Prothonotary/Clerk of Courts

COPI

Burton Neil & Associates, P.C.  
By: Derek C. Blasker, Esquire ID. NO. 202150  
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.

ASHLEY COOK DBA ABCOOK & SON : NO. 2008-1710-CD  
1 Long Run Road, Mineral Springs PA 16855-0060

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#### LAWYER REFERENCE AND INFORMATION SERVICE

David S. Meholic

Court Administrator

Clearfield County Courthouse

Clearfield, PA 16830

Telephone No. 814-765-2641 Ext. 5982

November 10, 2008  
Document

Reinstated/Reissued to Sheriff/Attorney  
for service.

William A. Shaw  
Deputy Prothonotary

C-16590

Burton Neil & Associates, P.C.  
By: Derek C. Blasker, Esquire ID. NO. 202150  
1060 Andrew Drive, Suite 170  
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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.

: NO.

ASHLEY COOK DBA ABCOOK & SON  
1 Long Run Road, Mineral Springs PA 16855-0060  
Defendant : CIVIL ACTION - LAW

**Complaint**

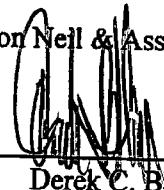
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C-16590  
REVISED (MP)

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By: 

Derek C. Blasker, Esquire  
Attorney for Plaintiff

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THE SIGNATURE ABOVE CERTIFIES THAT THIS IS A  
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**CitiBusiness®  
Platinum Select® Card**

Page 1 of 2

Account Summary Statement  
ASHLEY COOK  
ABCOOK AND SON  
Business Account 5 [REDACTED] 3184  
Total Cardmembers: 0  
March 3 - April 1, 2008

**QUICK REFERENCE**

Minimum Payment	\$5,275.83
New Balance	\$5,375.83
Due Date*	04/28/08
*Payment must be received by 5:00 pm local time on the Payment Due Date	
Past Due	\$1,448.93
Amount Over Limit	\$375.83

Business Credit Line	\$5,000
Available Credit	\$0
Cash Advance Line	\$2,500
Available Cash Advance	\$0

**How To Reach Us**  
Visit [cards.com](http://cards.com)  
Customer Service:  
1-800-750-7453 or write to  
CitiBusiness Card, P.O. Box 44180  
Jacksonville, FL 32231-4180

(-110890)

**NEWS FROM CITI**

Your account has been  
permanently closed. Remit the  
past due amount of \$1,448.93  
immediately.

**ACCOUNT SUMMARY**

Previous Balance.....	\$5,218.23
Payments, Credits and Adjustments.....	\$0.00
Purchases.....	\$0.00
Cash Advances.....	\$0.00
Finance Charges.....	\$122.60
Fees.....	\$35.00
New Balance.....	<b>\$5,375.83</b>

**MONTHLY ACTIVITY BY CATEGORY**

Miscellaneous.....	<b>\$157.60</b>
--------------------	-----------------

Detach and follow payment instructions on reverse side.

05082290019653184537583999995617

Business Account Number		
[REDACTED] 3184		
Please enter amount of payment enclosed		
Payment Due	New Balance	Minimum Payment
04/28/08	\$5,375.83	\$5,375.83
\$		

04/28/08  
265N 3M 22 A 1 C8851205

ASHLEY COOK  
ABCOOK AND SON  
P.O. BOX 60  
MINERAL SPRINGS PA 16855-0060

( ) New Credit Points ( ) Total Available Points  
Printed on or about [REDACTED] [REDACTED] [REDACTED]

CITIBUSINESS CARD  
PO BOX 183051  
COLUMBUS, OH 43218-3051

\* If you provide an email address, we may use it to contact you about your account. We may also use your email address to send you information about products and services you might find useful.

**EXHIBIT**

**A**

ASHLEY COOK  
ABCOOK AND SON  
Business Account 3184  
March 9 - April 1, 2008

Page 2 of 2

**BUSINESS ACCOUNT SUMMARY**  
**Business Activity**

**Purchases**

Standard Purch  
Trans Post  
04/01

Total Standard Purch

Description  
PURCHASES\*FINANCE CHARGE\*PERIODIC RATE

Amount  
\$122.60  
\$122.60

**Business Fees**

Standard Purch  
Trans Post  
04/01

Total Standard Purch

Description  
OVER CREDIT LIMIT FEE

Amount  
\$35.00  
\$35.00

**Finance Charge Summary**

**PURCHASES**

Standard Purch  
CASH ADVANCES  
Standard Adv

Nominal  
APR  
29.240%

Periodic  
FINANCE  
CHARGE  
\$122.60

Transaction  
Fee/ FINANCE  
CHARGE  
\$0.00  
\$0.00

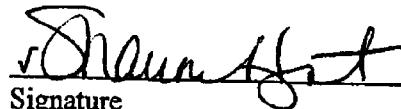
Total FINANCE CHARGE

\$122.60

**Verification**

**Shauna Houghton**

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.



Signature

**C-16590**

Ashley Cook

Account number ending in 3184  
1023

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104649  
NO: 08-1710-CD  
SERVICES 1  
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA) N.A.  
vs.  
DEFENDANT: ASHLEY COOK dba ABCOOK & SON

**SHERIFF RETURN**

**RETURN COSTS**

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	NEIL	045232	10.00
SHERIFF HAWKINS	NEIL	045232	20.27



5  
**FILED**  
0/3:30pm  
JAN 14 2009  


William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

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

  
Chester A. Hawkins  
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

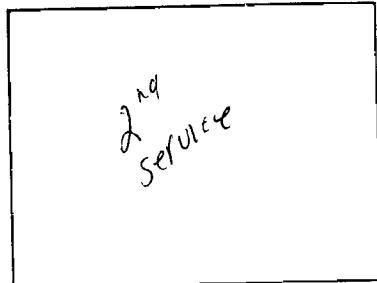
DOCKET # 104908  
NO: 08-1710-CD  
SERVICES 1  
COMPLAINT

PLAINTIFF: CITIBANK (SOUTH DAKOTA), N.A.  
vs.  
DEFENDANT: ASHLEY COOK DBA ABCOOK & SON

**SHERIFF RETURN**

**RETURN COSTS**

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	NEIL	048063	10.00
SHERIFF HAWKINS	NEIL	048063	10.85



5  
FILED  
013:30pm  
JAN 14 2009  
WM

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

\_\_\_\_ Day of \_\_\_\_\_ 2009



Chester A. Hawkins  
Sheriff

**CLEARFIELD County, Pennsylvania**  
**Department of Court Records**  
**Civil Division**

**COVER SHEET**

**Plaintiff(s)**

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

**Case Number:**  
2008-1710-CD

**Type of Pleading:**  
Praecipe

5 **FILED** ICC & I Cert  
m 2:21pm of disc  
AUG 17 2009 issued to  
William A. Shaw  
Prothonotary/Clerk of Courts  
Ashley Blasker

**Code and Classification:**

**Filed on Behalf of:**

Plaintiff  
CITIBANK (SOUTH DAKOTA), N.A.

Vs.

(Name of the filing party)

**Defendant(s)**

ASHLEY COOK  
1 Long Run Road PO Box 60  
Mineral Springs PA 16855-0060

Counsel of Record  
 Individual, if pro se

**Name, Address and Telephone Number:**

Derek C. Blasker, Esquire  
Burton Neil & Associates, P.C.  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
Telephone: 610-696-2120  
email: [litigation@burt-law.com](mailto:litigation@burt-law.com)

**Attorney's State ID:**

202150

**Attorney's Firm ID:**

(Signature)

Burton Neil & Associates, P.C.  
By: Derek C. Blasker, Esquire ID. NO. 202150  
1060 Andrew Drive, Suite 170  
West Chester, PA 19380  
610-696-2120  
Attorney for Plaintiff

CITIBANK (SOUTH DAKOTA), N.A.

Plaintiff

v.

ASHLEY COOK

Defendant

: IN THE COURT OF COMMON PLEAS  
: CLEARFIELD COUNTY, PENNSYLVANIA  
: NO. 2008-1710-CD  
: CIVIL ACTION - LAW

**Praecipe to Discontinue**

To the Prothonotary:

Kindly discontinue the above-captioned action without prejudice.

Burton Neil & Associates, P.C.

By: \_\_\_\_\_

Derek C. Blasker, Esquire  
Attorney for Plaintiff

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

C-16590

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Q  
C  
L  
V

Citibank South Dakota N.A.

Vs. No. 2008-01710-CD  
Ashley Cook  
ABCook & Son

**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 August 17, 2009, marked:

Discontinued without prejudice

Record costs in the sum of \$92.00 have been paid in full by Derek C. Blasker Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 17th day of August A.D. 2009.

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