

**In the Superior Court of the State of Washington
In the County of _____**

Citibank South Dakota,)
 Plaintiff)
)
vs.)
)
John Doe,)
 Defendant.)

Complaint

Comes Now the plaintiff for cause of action against the defendant and states as follows:

1. Plaintiff is a national banking association and is authorized to bring this action.
2. The defendant, John Doe, is believed to be a married individual and as such incurred the below-referenced separate and community obligation. Defendant resides in _____ County.
3. That at all times material, defendant has been the obligor of a certain credit card account bearing number XXXXXXXXXXXXX5882, that the defendant agreed by the use of said card to the card agreement terms and conditions, including but not limited to: (1) to assume responsibility for all credit extended on the basis of said accounts, (2) to pay, monthly, obligations evidencing such credit, service charges based upon the unpaid balances plus a reasonable attorney's fee in the event of suit, and (3) upon default in payment, that all obligations shall become immediately due and payable; and defendant has defaulted on said agreement.
4. By the use of said credit account defendant became indebted on said account in the stated amounts, the unpaid balance of which is \$2665.05 which is fully due and owing to plaintiff, together with such greater sum as may be proved at the time of trial, together with interest thereon at the highest legal rate.
5. That the sum \$650.00 is a reasonable sum as and for plaintiff's attorney's fees in the event of a default judgment herein and otherwise such further sum as the proof shall disclose.
6. We are debt collectors, this is an attempt to collect a debt, and any information obtained will be used for that purpose.

Wherefore, plaintiff prays for judgment against the defendant for the sum of \$2665.05 together with interest thereon at the highest legal rate, and any further sum which may be proven at the time of trial, and a reasonable sum as and for plaintiff's attorney's fees; that such judgment shall bear interest at the highest legal rate after entry, and that the plaintiff have and receive such other and further relief as in the premises shall appear just and equitable.

Dated April 14, 2010

Signed – lawyer for bad guys.