

IN THE DISTRICT COURT OF FULTON COUNTY, ARKANSAS

State of Arkansas,

Plaintiff,

VS.

**Case NOs. CR-24-543, CR-24-542,
CR-24-541 and WR-24-285**

Dave Campbell,

Defendant.

**DEFENDANT'S STATEMENT OF THE CASE
IN SUPPORT OF OPPOSITION TO O'DELL'S MOTION TO QUASH**

1. The preponderance of evidence indicates a conspiracy was enacted by O'Dell, Rogers, Turnbough, et al in a scheme of retaliation against Campbells for complaining about the Mammoth Spring Police Department and seeking redress pertaining to a pit-bull attack in the alley behind Campbells' home. **(Ex. 8)** Ms. Rogers' mother also works for the City and is the Notary who notarized the false arrest document used to arrest Dave Campbell. **(Ex. 32, P. 3)** On or about 10/10/24, Notary Gann was reprimanded by AR SOS John Thurston's office for notarizing the alleged affidavit without the presence of the Affiant and an oath. **(Ex. 32, P. 4)** Notary Gann obviously knows it is illegal to notarize an "*open-title*" Jurat. Ms. Rogers, Ms. Gann, et al are so angry and retaliatory toward Campbells, they knowingly violate the law while placing themselves in vulnerable positions so long as they can harm Campbells and place Campbells in the false light of "*domestic battering.*" Campbells were attacked by strangers last October, where one of the strangers, without cause, assaulted Dave Campbell and told Campbell he'd

“better not be getting aggressive with a woman.” O’Dell, Turnbough, et al intentionally committed their fraudulent acts to cause Campbells to be attacked in public, to cause people to hate Campbells, and so Campbells will live in fear and disgrace. Everyone involved in the conspiracy to retaliate against Campbells worked together as if fine machinery in a conspiracy to retaliate, which is outlined as follows:

A. Around August of 2024, Betty Dunn fell in front of her home while placing an item into her trash can. A passerby saw Mrs. Dunn laying on the side of the road and called 911. Paramedic Fowler, Chief Turnbough, et al assisted Mrs. Dunn and she refused medical treatment. Chief Turnbough called Campbells’ home after the incident, stating Mrs. Dunn asked him to call Campbells and, Mrs. Dunn insisted he not telephone either of her two sons.

B. Melissa Rogers is well acquainted with Mrs. Betty Dunn’s family, due to growing up as *‘neighbors’* in the Wirth and/or Williford, Arkansas area. Ms. Rogers learned online of Robert Frierson’s fraudulent *“ejectment”* lawsuit against Campbells. After Mrs. Dunn asked Turnbough to call Campbells instead of Gary and Randy Dunn Ms. Rogers sought out more information from Frierson, who falsely alleged Campbells were terminated for being thieves. Frierson falsely alleged he had to file an *“ejectment”* lawsuit to make Campbells leave. Frierson falsely alleged Campbells were trespassing squatters.

C. In September of 2023, Campbells were attacked by a loose pit bull dog in the alley behind Campbells’ home. Ms. Rogers informed Campbells, she has a dog like the

attacking dog. The City disrespected Campbells by ignoring their complaint. **(Ex. 8)**

D. On 10/26/23, Betty Dunn had a bad fall and suffered severe brain bleed.

E. On October 28, 2023, Campbells thought Betty Dunn went to Church at Mammoth Spring Church of Christ, so emailed Preacher / Councilman Barry O'Dell the following message about Betty Dunn's fall and sons, which O'Dell ignored until June of 2024, at which time he only addressed being called, "Pastor": **(Ex. 7 and Ex. 14)**

"Good Morning Pastor O'Dell, We understand our neighbor, Betty Dunn, is a member of your Church, which she speaks fondly of. She appears disheartened when she is not able to attend. She will not be able to do this Sunday, because she is in the hospital after a fall she had Thursday morning, which caused a swollen right eye and swelling on the right side of her head. An ambulance took her to West Plains, where she is in ICU, after the CAT scan revealed her brain is bleeding. Betty's cousin, Phil Howell, informed us Betty refused surgical procedures. A nurse told us Betty does not know where she is. Yesterday evening, Betty's youngest son was investigating Betty's home and told us he plans to cut off the door knobs, change the locks and sell his mother's home. Before being taken in the ambulance, Betty reminded us not to notify her sons. We assume the hospital notified her sons, because the nurse had informed us her two sons were listed as contacts. Also, Betty's cousin, Phil Howell, asked that we not notify Betty's sons, because there is so much fighting between them. Betty had told the nurse her sons are in Alabama. We are notifying you of this so you know to pray for Betty in her situation. Thank you for your time and attention. In Jesus' Name, Dave & Dawn Campbell"

F. On October 30, 2023, Randall Dunn brought a ladder to Betty Dunn's home, removed her air conditioner and was found by Dave Campbell crawling through Betty Dunn's bedroom window. Campbell immediately contacted MSPD Chief Turnbough, who alleged it was a civil matter. Campbell then called FCSO, who dispatched Turnbough, who arrived with his assistant. Assistant Chief Barnett immediately aggressed upon Campbells, as if he were going to throw them to the ground. Dave

Campbell stepped forward and rationalized with Barnett, who quickly realized the impropriety of Randall's entrance. Barnett instructed Randall not to return without legal paperwork.

G. On or about 12/06/23, Defendant's neighbor, Shayne Peterson, was reported to the children's hotline for an issue Campbells were mandated to report, due to being sworn CASA advocates. At that time, Peterson informed Campbells, the people who represent Mammoth Spring City Hall stated things about Campbells proving Campbells are bad people. Peterson then threatened Campbells would soon be getting into trouble. Chief Turnbough visited Campbells that day and alleged to Campbells, there is a paper at City Hall notifying everyone at City Hall, Betty Dunn's sons are prohibited from her home until she has passed away. A short time later, Petersons installed surveillance cameras pointed at Campbells, with one being pointed into the screened-in front porch. Chief Turnbough refused to advise Peterson to remove the camera shooting into Campbells' home and instead alleged the cameras probably didn't even work

H. On March 21, 2024, Peterson hired a crew to construct a massive border wall. Peterson's worker assaulted Campbells upon Dave Campbell notifying Peterson's crew, Arkansas has laws prohibiting fences over 8' tall.

I. On March 22, 2024, Barry O'Dell purchased kettle corn from Campbells and did not correct or scold Campbells for calling him "*Pastor.*" (**Ex. 12**) In June of 2024, O'Dell expressed contempt for Campbells for calling him "*pastor.*" Therefore, it appears O'Dell was repressing his contempt for Campbells. O'Dell's bizarre outburst for being called Pastor after ignoring Campbells' 10/29/23 email about Mrs. Dunn leads to a

preponderance of evidence revealing O'Dell's conspiracy to retaliate against Dave and Dawn Campbell. (Ex. 14)

J. On March 22, 2024, Shayne or Renetta Peterson falsely reported to MSPD, Dawn Campbell threatened Renetta Peterson.

K. On or about March 27, 2024, Campbells spoke on the phone with Assistant Chief Barnett about filing a complaint against Peterson for making a false police report and for Peterson's employee's 03/21/24 attack. During the call, Barnett stated, he was "trying" to show "respect," which caused Dave Campbell to state the word "shit" in a sentence, due to being flabbergasted by someone alleging to be "trying" to show respect.

L. On or about March 29, 2024, Campbells walked into City Hall and informed Melissa Rogers they would not file charges from 3/21 and 3/22, because Campbells "want to get along."

M. On April 01, 2024, Campbells were on the City Hall meeting agenda to discuss Peterson's massive border wall. Immediately, Campbells' objection was halted by Mayor Busch falsely alleging the wall was coming down, because Petersons "want to get along." Mayor Bush then stated to Dave Campbell he'd been notified by Assistant Chief Barnett, Dave Campbell had "cussed out" Barnett on the phone. Campbells defended themselves against Mayor Busch's allegation by stating facts surrounding the ignored pit bull attack and the 10/30/23 break-in at Mrs. Dunn's. Campbells were explaining that is the reason Barnett was told on the phone Campbells feel as they are treated like "shit" by Barnett. Mayor Busch prohibited Campbells from speaking further by stating, "you're

done.” Mayor Busch then laughed and said it’s funny Campbells have complaints when Campbells are the ones complained of. When Dawn Campbell asked Mayor Busch to state the complaints made against Campbells, Busch alleged Campbells are lacking friends. Dave Campbell then touched Dawn Campbell’s elbow while stating, “*C’mon, Baby, let’s go.*” MSPD Chief Turnbough yelled to Campbell, “*DON’T EVER TOUCH YOUR WIFE LIKE THAT AGAIN.*” Campbells left and then returned with Dave remaining in the lobby. Turnbough continued goading Dave, stating, “*BE A MAN*” and “*GET BACK IN THAT MEETING WITH YOUR WIFE.*” Turnbough alleged on 04/01/24, Campbells need to hire an attorney and Campbells better watch what Campbells state on a website. Evidence reveals O’Dell, Turnbough, et al are conspiring in an agreement to protect Mrs. Dunn’s offspring and to cause elder abuse against Mrs. Dunn while at the same time defaming Campbells. Dave Campbell is also an elder person, who is older than the three Dunns who attacked Campbells on 07/16/24. On 04/01/24, Campbells were shut down for discussing Randall Dunn’s break-in at 435 Bethel Avenue on 10/30/23, wherein Chief Turnbough attempted to permit Randall Dunn’s unlawful act. Evidence reveals a conspiracy to aid Gary and Randy Dunn’s abuse against Betty Dunn by falsely framing Dave Campbell as being the bad actor.

N. On April 15, 2024, Campbells served a Preservation Notice for the 04/01/24 council meeting video to the City of Mammoth Spring’s mayor and attorney. Campbells also served a letter to MSPD Chief Turnbough seeking redress pertaining to his 04/01/24 unlawful order, which Turnbough ignored. The Preservation Notice was also ignored, as

Barry O'Dell admitted on 01/03/25, their security company deleted the 4/1/24 video, because videos must be deleted after they are one-month old, despite the 4/15 order to preserve the 04/01/24 video evidence. **(Ex. 30, P. 44)**

O. On or about May 28, 2024, Mr. O'Dell stated about Campbells' billboard, "*...across from Bank of Salem. It is changed every few days with a new message of victimhood.*" **(Ex. 30. P. 1, Last Par.)** "*I also find it rather humorous that locals don't know where the sign is.*" **(Ex. 30, P. 2, 3rd Post)** A FOIA request was sent to the City of Mammoth Spring to substantiate O'Dell's "*victimhood*" allegation and City could not, because there are no victims from Campbells' sign, which proves O'Dell lied. **(Ex. 24)** Mr. O'Dell falsely alleged "*...they [Campbells] change it at every perceived slight. It just depends.*" **(Ex. 30. P. 3, 3rd Post)** Mayor Busch's daughter asked Mr. O'Dell what the sign says now and Mr. O'Dell responded with a picture of Campbells' sign stating, "*JUNKYARD WALL BELONGS TO THE GRUMPY OLD MAN NEXT DOOR WHO FLIPS US OFF AS HE DRIVES BY.*" Prior to the foregoing sign, the neighboring used car salesman, Shayne Peterson, drove by Campbells' property repeatedly while in different vehicles and while flipping off Campbells as he honked to ensure it would appear Campbells aren't liked by many. People also believed the massive wall belonged to Campbells. One man stopped in front of the massive wall and yelled profanities at Campbells while complaining about the massive wall. **(Ex. 30. P. 3, No. 4-5)**

P. On 06/21/24, the City of Mammoth Spring revealed evidence spoliation by admitting the 04/01/24 video "*is no longer available.*" **(Ex. 6)** Secretary Rogers waited until 04/22/24 to notify the security company of Campbells' Preservation Notice. In her

04/22 email, Rogers specifically notated the audio is excluded. **(Ex. 11)** A preponderance of evidence reveals Secretary Rogers interfered with mail served to an elected official. **(Ex. 1 and Ex. 2)** Exhibit 2 causes suspicion due to Rogers alleging she opened the package, which specifically notated it was not for her, due to thinking it was a water bill. The exonerating 04/01/24 video evidence was destroyed by the City of Mammoth Spring, whose reps defrauded by falsely alleging Dave Campbell's aggressive.

Q. Due to O'Dell's false allegations, Campbells are liars who victimize people on a sign, which is changed by every perceived slight, without any facts to support his allegation, O'Dell's clueless Facebook friends have joined the public hate speech against Campbells. O'Dell caused at least one of his friends to believe Campbells are after O'Dell when in reality, apparently O'Dell prayed for God to destroy Campbells. (Ex. 30, P. 45) O'Dell's friend commented, *"I'm not sure what's going on, I just know that from some of your posts for awhile now that someone or some people are after you for something."* Another wrote, *"Who in the world is Dave and Dawn? And why do they care how much time you spend online. Don't Dave and Dawn have anything better to do?? Bless their hateful hearts..."* O'Dell's friend called Campbells "hateful" after reading O'Dell's false statements "for awhile now" about Campbells. Now O'Dell is paying money to attempt to keep from substantiating it is O'Dell who lied against Campbells by falsely alleging Campbells lied. **(Ex. 30, P. 36)**

R. On June 6, 2024, Campbells served a resignation request to Mr. O'Dell via mail and email. **(Ex. 13)** O'Dell refused Campbells' USPS mail. Campbells' email to Mr. O'Dell stated, *"Mr. O'Dell: Please find attached a letter with attachments for you.*

A hard copy is being mailed to you.” Campbells’ letter referred to O’Dell as, “Mr. O’Dell.” Despite Campbells stating “Mr.” instead of “Pastor,” O’Dell responded at 4:14 PM on June 6, stating, “Correct your records. I am not a pastor.” (Ex. 14. P. 1) Campbells’ 10/28/23 unanswered email to O’Dell is the only email where Campbells referred to O’Dell as “Pastor.” (Ex. 7) Therefore, O’Dell’s demand is malicious.

S. Mr. O’Dell was then asked “The correction should be what, just Mister? What is your position at the church? We want to address your position correctly. Are you just a blogger/author for the church? Your name appears associated with the Church of Christ.” (Ex. 14 P. 2) Mr. O’Dell replied, “If you’d like to look at God’s word with me about it. I’d be happy to explain.” (Ex. 14, P. 3)

S. At 10:28 PM on June 6, 2024, Dave Campbell emailed Mr. O’Dell: “According to your April 1st city hall witness, your actions are far from God’s Word. It took a few minutes to look at the Church of Christ website defining Pastors. Oops, who knew. Now we do. For most of a year we believed there was someone else who looks like you. Now we learn you are the same guy. Funny, you never took the time to teach us God’s Word when we first asked you if you are the pastor of the Church of Christ. Not many can preach without the heart of a teacher. You’ve failed the test at least twice with us. Answer this, Preacher O’Dell; would you have acted the way you did on April 1st if the same scenario played out in your church? Meaning: when evil lurks its head, would you keep your mouth shut as you did April 1st? As we see it, you denied Christ at least 3 times April 1st. You hid your witness. Repeatedly, you condoned what was evilly displayed. With nepotism of nine in your city circle, who would speak up? A good man

would have stood up. We believe you deserve no position in life until you do some serious soul-searching. If you're a good man deep down, you'll know what to do. If you're not good-man material, you'll figure it out. We could do a reenactment for your congregation (hope that's the correct word) and see how they react. Thank you for your reply and offer none-the-less." Mr. O'Dell responded at 10:53 on June 06, "That's the type of answer I'd expect from you. Have a good night." (Ex. 14, P. 4)

T. On June 7, 2024, Mr. O'Dell publicly posted on Facebook, "'Do not answer a fool according to his folly, lest you also be like him' (Pro. 26:4). Okay, maybe I shouldn't get a yard billboard. 'Answer a fool according to his folly, lest he be wise in his own eyes' (Pro. 26:5). On second thought..." (Ex. 30. P. 4) Mammoth Spring Councilman Thomas Owsley's wife commented on the foregoing, "You must have checked your mail today..." referring to the resignation request Campbells served Councilman O'Dell. Mr. O'Dell replied to Mrs. Owsley, "got it, went to the PO, did a return to sender." Kim Ragsdale asked "are they sending mail to council members now??" (Ex. 30. P. 4) Jeff Wilkening asked Mr. O'Dell, "Ever heard the term 'Public servant'?" (Ex. 30. P. 7, 5th Post)

U. On or about 06/08/24, Campbells' sign stated: "PREACHER IS NOT A PASTOR. PREACHER CAN BE A FAILURE AS HE WAS AT MS CITY HALL 4.1.24!" (Ex. 30, P.8) Mr. O'Dell then posted publicly on Facebook, "I strongly believe that Christians must be involved in politics – from local to national level. Vote. Get involved, but be ready. When people don't get their way, they'll come after you. You learn pretty quickly how petty and hateful people can be. I also know that, while Christians are to be

kind, being kind does not mean being a push-over or doormat. When you do not allow people to intimidate you or you stand up to them, YOU become the bad guy in their sight – and to anyone who will listen to them. It is sad and pathetic to see the kind of behavior like this is in our city.” Mr. O’Dell included an image of Campbells’ sign with an image of Dave Campbell’s rear while bending over to pick up sign letters. **(Ex. 30, P. 8)** Mr. O’Dell’s Facebook friends piled on against Campbells with one in particular stating, *“This needs to be squashed.”* **(Ex. 30, P. 9)**

V. On June 8, 2024, Mr. O’Dell posted publicly on Facebook: *“No, the sign is a fail-ure. IYKYK. You cannot get much more 6th-grade playgroundesque (sic) than that.”* **(Ex. 30, P. 10)** Councilman Owsley’s wife commented to Mr. O’Dell, *“Now, I’m trying to figure out how they can see your FB posts.”* **(Ex. 30, P. 10)**

W. On or about June 9, 2024, Campbells’ sign stated: *“BARRY: LEADER OF CITY & CHURCH, CONFIRMS FLITTY SELF, POSTS PICTURE OF DAVE’S REAR ON WWW!”* **(Ex. 30, P. 14)**

X. On June 10, 2024, Mr. O’Dell posted publicly on Facebook: *“Ladies and Gentlemen of Mammoth Spring, this what (sic) we are dealing with. A friend sent me the first pic before the sign was done. I got a pic of the finished product. Flitty means, ‘unstable, fluttering, ostentatiously homosexual.’ They have used their little billboard to lie and now, defame.”* **(Ex. 30, P. 14)**

Y. At the 06/10 council meeting, O’Dell publicly berated Campbells during the council meeting, while prohibiting Campbells from speaking in defense. O’Dell slandered Campbells by falsely alleging Campbells stated he is *“homosexual.”* Mayor

Busch summoned MSPD “*Jamie*” when Campbells attempted to defend themselves, by informing everyone the primary definition for “*flitty*” is “*unstable.*” O’Dell, while acting under the color of law, stated: “*But, uh, we had friendly conversations. I met you at Steve Atkins Saw Shop is the first time I met you. I invited you to our worship services. Everything’s been fine. But when you didn’t get your way at city hall -- And you have -- and it’s on video – when -- it’s on video -- you lied about you touching your wife’s elbow. It’s on video. That’s not what happened.*” On 06/10/24, the board removed “*Pit Bull*” as being an outlawed pet by renaming “*Pit Bull*” to “*vicious dog*” and never addressed the pit bull dog attack against Campbells. (Ex. 5)

Z. The 06/10/24 Meeting Minutes do not reflect O’Dell’s public shaming of Campbells. (Ex. 9) (Ex. 5, P. 3-5)

AA. On June 11, 2024, Mr. O’Dell posted publicly on Facebook, “*Words can be tools to help or weapons to harm. When you use them as clubs to publicly attack, don’t cower behind your ‘rights’ and then pretend you’re an innocent victim acting virtuously out of self-defense when confronted about having demonstrably lied and misrepresented. You cannot get much more egocentric than that.*” (Ex. 30. P. 22) In actuality, Mr. O’Dell is the one being confronted about having demonstrably lied and misrepresented. He alleges Campbells lied, yet will not give an example of one lie and hired a \$1,400-per-day attorney to quash a subpoena which asked him to state all lies he alleged were made by Campbells. The “*lie about touching your wife’s elbow*” was proven to be false when Turnbough alleged in Case No. 25CV-24-73, his order, “*DON’T EVER TOUCH YOUR WIFE LIKE THAT AGAIN,*” was made after Dave Campbell “*attempted*” to touch Dawn

Campbell. (Ex. 26, No.5 and Ex. 27, No. 5)

BB. Robert Frierson frequents Campbells' website due to Frierson's acts being topics. After seeing the video of O'Dell's public shaming on Campbells' website, Frierson falsely alleged Campbells were "*ran off*" from Dunnellon, Florida due to Campbells' sign.

CC. On or about 07/01/24, in response to people publicly and erroneously alleging on Facebook, Campbells defamed people on a billboard sign, Mike Brown (who lives next to O'Dell's church) posted, "*Supposed to have been kicked out and ran off for doing the same thing where they are from.*" (Ex. 16)

DD. On 07/16/24, Turnbough, et al enacted law-fare against Campbells in retaliation for Campbells complaining about MSPD. O'Dell, Turnbough, et al worked together in an agreement to harm Campbells by committing actions to enable the false and unconstitutional arrest of Dave Campbell.

EE. On 07/16/24, Turnbough and Rogers also filed injunction requests to ban protected speech, wherein Ms. Rogers' friend, Lauren Siebert from Williston, reported Turnbough and Rogers' SLAPPs on the radio as if they were criminal matters and as if Turnbough/Rogers had already prevailed. Siebert falsely reported, Injunctions were filed against Campbells for committing defamation on a sign.

FF. On 07/16, O'Dell, Turnbough, et al were already notified of Mrs. Dunn's estranged and volatile relationship with her sons and knew her sons were considered trespassers at 435 Bethel AV until Betty Dunn passed away.

GG. On 07/16/24, Brenda, Randy and Gary Dunn appeared inside City Hall and

notified Notary Gann, et al they were about to trespass at 435 Bethel Avenue and anticipated a conflict with Campbells. Notary Gann, et al ignored Campbell's 911 plea and waited until Brenda Dunn requested assistance before dispatching an officer to the scene.

HH. At approximately 9:55:06 on 07/16/24, Chief Turnbough stood down to Defendant's 911 call. Ms. Hutchison notified Chief Turnbough, "*He says he's packing. And he's headed that way. I told him, 'you'd better not unpack.'*" Chief Turnbough falsely alleged, "*Well, I'm not supposed to be there, so you'll have to send an officer.*" (Ex. 29, P. 1, L. 11-12) No evidence supports Turnbough's allegation.

II. Assistant Chief Barnett admitted to Dispatcher Hutchinson on 07/16/24, Ms. Rogers called him and Officer Crawford was already on the scene. (Ex. 29, P. 4, L. 22 and Ex. 29, P. 5, L. 3) On 07/16/24, Turnbough made five major material misrepresentations to the 911 Dispatcher in standing down to Dave Campbell's 911 plea against Randy and Gary Dunn's attack against Betty Dunn. The five misrepresentations are: 1) Turnbough falsely alleged at 09:55:06 on 07/16/24, he had no officers available to respond to Dave Campbell's 911 plea; 2) Turnbough falsely alleged he is not allowed to be at 435 Bethel Avenue; 3) Turnbough falsely alleged Dave Campbell instructed him not to go on a call. 4) Turnbough falsely alleged Dave Campbell would not be happy, no matter what. 5) Turnbough failed to disclose to dispatch he was filing a civil suit against Campbells that same day. (Ex. 29, P. 2, L 11-23)

JJ. In Turnbough's second conversation with Dispatcher Hutchinson to make an excuse for his misrepresentation, Turnbough falsely alleged Campbells requested he

not go through the sheriff. (Ex. 29, P. 5, L. 24) Turnbough's material misrepresentation was revealed by Assistant Chief Barnett at 10:07:36. Barnett called Dispatcher Hutchinson asking if she had officers close to Mammoth Spring. Ms. Hutchinson stated she had them headed that way, though they aren't close, because they drove from Salem. Ms. Hutchinson informed Barnett Jamie alleged no one was on duty. Barnett admitted to Ms. Hutchinson, Officer Crawford was already on the scene. Turnbough then called Ms. Hutchinson admitting his misrepresentation. (Ex. 29)

KK. On 07/16/24, Fulton County 911 Dispatcher Linda Hutchinson reminded Turnbough: Randy and Gary Dunn were not supposed to be at 435 Bethel Avenue with Betty Dunn. Ms. Hutchinson reminded Turnbough, "*we've been through this a dozen times*" and Turnbough agreed. (Ex. 29, P. 2, L 1-8) Rogers and Turnbough knew Gary and Randy Dunn were classified as trespassers on 07/16, yet stood down to their attack against Betty Dunn and Campbells. Mrs. Rogers maliciously and negligently failed to contact MSPD Chief Turnbough, MSPD Assistant Chief Barnett, or MSPD Officer Crawford when Randy and Gary Dunn alerted Rogers, the Dunns were about to harass their mother again. Mrs. Dunn has a history of issues with her offspring and filed a criminal complaint against her granddaughter-in-law around April of 2024, which was ignored, with MSPD and Fulton County Prosecutor violating Mrs. Dunn's 14th Amendment Right to Equal Protection under the Law. Despite fabricating the preposterous and forged affidavit of probable cause for arrest in these charges, MSPD incriminatingly failed to submit a probable cause statement on behalf of Betty Dunn. No one followed up with Betty Dunn concerning her complaints to FCSO and MSPD.

Simmons Bank reported Amanda Dunn's suspicious activity on Mrs. Dunn's bank account at least twice, according to its representatives. On 05/18/24, Mayor Busch mailed Mrs. Dunn a letter admitting Amanda Dunn received the POA for Mrs. Dunn when Mrs. Dunn was 'ill and unconscious,' which he admitted he verified with MSPD. MSPD knew Mrs. Dunn fell on 10/26/24. (Ex. 17) The questionable POA is dated 11/04/24. (Ex. 18) In May of 2024, D.P.A. Plumlee sent a letter to Turnbough denying Mrs. Dunn an investigation. (Ex. 19) **Mr. Plumlee admitted to Campbells, no probable cause statement exists pertaining to Betty Dunn.**

LL. Turnbough also committed fraud by suing Campbells on 07/16. Turnbough and Ms. Rogers falsely alleged Campbells stated, "*Jamie and Melissa get it on,*" on a billboard sign, to bar protected speech. On 08/02/24, O'Dell appeared to attempt to substantiate Turnbough and Rogers' fraudulent "*Jamie and Melissa get it on*" accusation by stopping by Campbells and yelling at Campbells with a false allegation he has statements made by Campbells, which Campbells failed to publish on Campbells' website. O'Dell also alleged he was compiling documents on Campbells.

MM. On 07/16/24, Gary and/or Randy Dunn attempted to defraud Fulton County Paramedic Randy Fowler, who admitted, "*Upon our arrival to the scene we are met by a gentleman who reports his mother needs a mental evaluation and he has power of attorney. Patient is found standing at the back door and is noted to be CA&O x3 and able to report there is nothing wrong with her and her sons are wanting to put her in a Nursing Home and take her house. Further primary and secondary assessment neg to obvious for complaint or obvious abnormalities noted at the present time. Patient's son*

continued to report patient needs to be transported to the Hospital and he has Power of Attorney and he produces paperwork but it's not Power of Attorney but shows Power of Attorney was revoked by patient and signed by patient and a Notary Public several years ago. This information is relayed to patient's son and he was advised that we couldn't legally transport patient against her wishes and she is conscious alert and oriented and has answered all of my questions appropriately and her Vital Signs and BGL are all within normal limits and he would have to contact patient's PCP and go through the legal system." **(Ex. 21, P. 2, Destination Section)**

NN. Concerning his alleged injuries caused by Dave Campbell on 07/16/24, Gary Dunn's medical report by Dr. Washburn states, "*He is doing okay but was told to come and be checked out by the police.*" **(Report on Gary Dunn, par. 8)** Dr. Washburn's report evidences Dave Campbell did not injure Gary Dunn by admitting, "*nothing on his right side is hurting.*" **(Report on Gary Dunn, par. 7)** It was a right-side fall, which is proven by the video evidence. On 07/16/24, Randy and Gary Dunn revealed the conspiracy to retaliate against Campbells. Approximately five minutes after Gary Dunn assaulted Dave Campbell, Randy Dunn stated to Campbell, "*A warrant's out for you.*" **(Ex. 20, P. 11, L. 19)** Gary Dunn evidenced the law-fare against Campbells when he stated, "*You haven't seen low until you go to court.*" **(Ex 20, P. 11, L. 22)**

OO. On Friday, July 19, 2024, Barnett attempted to Notarize his false arrest affidavit against Dave Campbell at Simmons Bank and was denied by Sandra Davis. Also on this date, Gary, Randy and Brenda Dunn gave different statements for Barnett's false affidavit than what they submitted on 07/16/24. D.P.A. Plumlee's response to

Campbell's FOIA Request, which Plumlee did not complete before retiring, included only the 07/16/24 Dunn statements and excluded Barnett's false affidavit. Plumlee was not going to send the 07/19/24 Dunn statements, which are the only statements filed in the criminal case(s).

PP. Due to Affiant Barnett not being on duty on July 22, 2024, City Attorney Carl Plumlee, while in the role of a detective, retrieved Barnett's unsigned affidavit and directed Notary Barbara Gann to Notarize the document without a signature, or required oath. Plumlee then took the "open-title" Jurat to Officer Crawford, who signed in place of Affiant Barnett. City Attorney Plumlee then uttered the false document to his alter-ego (Deputy Prosecuting Attorney) and signed his name along with "D.P.A." and "approved." A FOIA request revealed this is not the customary practice for Mammoth Spring's arrest affidavits and Dave Campbell was prejudiced by Plumlee's maneuver. Within two-and-a-half hours from start to end, Plumlee received Magistrate Weaver's signature upon his false document and District Clerk Brandon Holder's signature. Ark. Rule 7.1, 7.2 and other rules were violated by not having the affiant's signature on the Jurat and for Plumlee and Holder failing to attach the uttered document, or any paper, to the warrant. Therefore, Dave Campbell suffered severe prejudice by not being served with the papers necessary to fairly enter a legal defense. The Prosecution refused to provide a single paper until February of 2025. Even then, the Prosecution's office failed to serve Dave Campbell with a copy of the false affidavit, requiring another request.

QQ. On July 24, 2024, Mr. O'Dell stated publicly on Facebook, "*Dave and Dawn Campbell are at it again on Main St. They are liars. I have been archiving their*"

website because they are constantly doing this ridiculous stuff. No city equipment has been used. My son has a new Bad Boy mower that looks like what the city uses. These people do not know nor do they care about the truth! They have their own reality and it is delusional. For me, it's been quiet with them lately, but they have falsely accused me (and others) of many things and yet constantly play the victim. O'Dell failed to disclose any alleged deeds Campbells falsely accused him, or anyone of. O'Dell's words are to defame and injure Dave and Dawn Campbell.

RR. On 08/01/24, a misrepresenting attorney from Mountain Home (Mr. Burnett) mailed Campbells a letter falsely accusing Campbells of trespassing and harassing Gary and/or Randy Dunn via the USPS, which is all blatant fraud for which no evidence exists to support such defamation. **(Ex. 25)** Burnett's Dunn clients have a future ownership in 435 Bethel AV. Betty Dunn has the current ownership. **(Ex. 23)** The preponderance of evidence against O'Dell, et al is increased by Burnett's letter being written prior to Dave Campbell's arrest.

SS. On 08/02/24, O'Dell appeared across the street from Campbells' home and falsely accused Campbells of not having "*the pimp sign*" on Campbells' website. O'Dell indicated he is compiling documents about Campbells to use against Campbells.

TT. On 08/02/24, Dave Campbell was arrested as a result of defending Betty Dunn, Dawn Campbell and himself on 07/16/24. On 08/02/24, prior to said arrest, Barry O'Dell stopped by Campbells and falsely accused Campbells of publishing lies and of not displaying "*the pimp sign*" on their website. Mr. O'Dell alleged on 08/02, he has compiled documents pertaining to Campbells

OO. On 8/02/24, shortly before Dave Campbell's unconstitutional arrest, Barry O'Dell stopped at the bank across the street from Campbells and yelled across the street at Campbells. One of the things O'Dell yelled at Campbells was, Barry O'Dell has been compiling documents to use against Campbells. Therefore, O'Dell is required to produce the documents he alleged the day of Dave Campbell's arrest, he compiled. The subpoena is with merit for seeking his compiled documents. O'Dell's act is strange.

PP. On 09/22/24, Louise "Dunn" Alexander, first cousin to Gary and Randy Dunn appeared at 435 Bethel Avenue to berate Mrs. Betty Dunn for placing Gary and Randy Dunn on a no-visitation list while she was in rehab the previous month. When Dawn Campbell showed Ms. Alexander she was recording her conduct, Ms. Alexander assaulted Dawn Campbell by punching Campbell in the ribs and knocking her camera to the ground.

QQ. On 09/30/24, Paul David Kauffman, M.D. made a major material misrepresentation concerning Betty Dunn in Case No. 25PR-24.76. Dr. Kauffman erroneously testified he examined Mrs. Dunn on 07/16/24 and found her mentally incapacitated. Campbells reported the false finding to Arkansas' Medical Board and Dr. Kauffman changed the incapacitated date to 07/01/24. Mrs. Dunn's 07/01/24, medical report evidences Mrs. Dunn was found by Dr. Kauffman to be "*alert and oriented*" during the 07/01/24 examination. The report states nothing about a test on 07/01/24.

RR. On or about 10/04/24, Randall Dunn received emergency guardianship of Betty Dunn. The hearing for Mrs. Dunn's Fulton County case was held in Independence County and the Southfork Nursing Home refused to transport Mrs. Dunn, despite her