

**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 OPPOSITION TO MOTION TO QUASH BY TURNBOUGH**

Comes now Defendant Dave Campbell, appearing pro se and opposing James Turnbough's "*Motion and Brief in Support of Motion to Quash Subpoena*" which was served USPS on 03/03/25. My primary defense, with exception to the fraudulent affidavit, is conspiracy to retaliate. Mr. O'Dell and Mr. Turnbough have played the most prominent roles in the conspiracy to cast me and my wife in a false light of "*domestic violence*." It is beyond a reasonable doubt, Mr. Turnbough and Mr. O'Dell, et al conspired to cause me to be fraudulently charged with "*Domestic Battering*." Turnbough and O'Dell both publicly alleged my wife and I lied while refusing to state the alleged lies. The information requested from Mr. Turnbough is the allegation of a "*lie*" he repeatedly publicized without substantiating. In support of my opposition to Mr. Turnbough's Motion to Quash the Subpoena, I submit the following:

**I. Objections:**

1. I object to exhausting three days defending Mr. Hass' attempt to set a hearing on Turnbough's motion to Quash to be heard before the motion is ripe for hearing. Mr. Hass' attempt to deprive due process delayed my ability to respond to his two quash motions. I exhausted all free moments preparing my quash opposition to file

by 3/17.

2. I object to being charged an excessive and unlawful fee of \$200 for evidence. Hass' argument in attempting to conceal evidence violates the Freedom of Information Act.

3. I object to the absurdity of Mr. Hass alleging the request for evidence is to circumvent a \$200 fee, which is debatable. I am asking for the lie Turnbough has alleged Dave and Dawn Campbell stated. The burden is on Turnbough to provide the evidence. The fee is irrelevant. On the requested video, Turnbough violated Campbells' Constitutional Rights; therefore, there should be no fee, must less an exorbitant fee.

4. I object to Mr. Hass representing Turnbough in his personal capacity. Mr. Hass has a personal interest in these charges, because he represents the City of Mammoth Spring.

5. I object to Mr. Hass failing to serve the State with his filings in the foregoing Cases, which resulted in Prosecutor Smith attacking me for sending him a copy of Hass' quash motions in the foregoing cases.

6. I object to Mr. Hass' filing failing to attack the sufficiency of the subpoena.

7. I object to Mr. Hass' filing attacking merits of case(s), which is not permitted. Addressing the merits of the case(s) is what the litigation process is all about. I object to this attempt to prejudice me from fully presenting my defense.

8. I object to the conflict of Mr. Hass representing Turnbough in his personal capacity while also representing the City of Mammoth Spring. I object to Mr. Hass conspiring with Turnbough to conceal evidence to aid his client City's fraudulent charges. Mr. Hass' conflict harms and prejudices me. Turnbough and Hass swore an oath, which contradicts their actions in attempting to protect Turnbough from stating my lies

he's alleged.

**II. The Subpoena is Sufficiently Clear and Relevant to the Cases Because the Information Relates To My Primary Defense:**

1. My defense will show James Turnbough is a party to the conspiracy to retaliate, which resulted in my unconstitutional arrest.

2. James Turnbough is a chief of police has spent almost a year defaming me. He habitually calls Campbells "*liars*" without ever stating a falsity. O'Dell and Turnbough make no secret they consider Dave and Dawn Campbell as enemies. O'Dell falsely alleged Campbells are not "*in Christ*." On 03/13/25, O'Dell posted publicly on Facebook, "*I have grown in my understanding of and appreciation for the imprecatory Psalms*." In response to a question about "*imprecatory*," O'Dell responded, "*the psalmist asking for God to curse/destroy his enemies*." O'Dell was silent when reminded its God's enemies; not O'Dell's. O'Dell was silent when reminded God also teaches judgment in O'Dell. **(Ex. 30, P. 45)**

3. An "*imprecation*" is "*a prayer that harm will come to someone*." **(Ex. 30, P. 46)** "*Imprecatory*" is "*invoking evil*." **(Ex. 30, P. 47)**

4. It is an act of wickedness to invoke evil. O'Dell behaves wickedly against Campbells to such a degree the preponderance of evidence reveals he is the primary conspirator in the fraudulent act in this matter where Campbells are in a false light of "*Domestic Battering*." **(Ex. 22)** The prosecutor fraudulently placed Dave Campbell in the false light of a felony charge in deceitfully opposing Campbell's Motion to Dismiss. **(Ex. 34, P. 3)** The preponderance of evidence reveals O'Dell and Turnbough are conspiring with others to punish and injure Dave and Dawn Campbell.

5. Barry O'Dell admitted to retaliating against Dave and Dawn Campbell on 06/10/24 for seeking redress. **(Ex. 30, P. 44)** In retaliation, O'Dell publicly shamed

Campbells for calling him a "*homosexual*," which Campbells never called him. In shaming Campbells, O'Dell repeatedly called Campbells "*petulant*" while he was acting huffy and irritable in front of a packed house on video. When Campbells tried defending against O'Dell's false allegation of calling him "*homosexual*," by informing the crowd the primary definition for "*flitty*" is "*unstable*," Chief Turnbough was summoned to violate Campbells' 1<sup>st</sup> and 14<sup>th</sup> Amendment Rights.

6. It is a malicious and blatant act of retaliation for a chief of police to publicly accuse a citizen of telling a lie and failing to state the lie supposedly told. That is defamatory and Mr. Hass' is aiding Turnbough's defamation by concealing the lie. The damage is done and Mr. Hass is participating in Mr. Turnbough's defamation campaign.

7. The fact Turnbough chose to pay good money to keep from setting forth the lie he fraudulently accused my wife and me of proves Turnbough is in a conspiracy to cause me and my wife harm.

8. Barry O'Dell admitted to evidence spoliation by his gang, which exonerates me against the defamation O'Dell and Turnbough maliciously pursued by falsely accusing me of being involved in an "*incident*" during the 04/01/24 city council meeting wherein I was "*aggressive*". Turnbough falsely alleged I was aggressive against my wife and O'Dell falsely alleged I was aggressive against the city council. Both are false, which is why they destroyed the video. Barry O'Dell admitted the video was destroyed after 04/30/24. My preservation notice was served to O'Dell, et al on 04/15/24. Therefore, the exonerating exhibit I preserved was destroyed intentionally so O'Dell, Turnbough, et al can attempt to uphold their fraud in order to destroy my wife and me.

9. Turnbough stood down and lied to Fulton County Dispatch to cause my unconstitutional arrest. The facts speak for themselves. A big and disturbing fact now is

Prosecutor Smith's fraudulent argument in my Motion to Dismiss alleging the four misdemeanor charges herein constitute a felony resulting in a sworn statement being unnecessary. The fact ALL actors are fraudulent indicts Turnbough.

10. Barry O'Dell received an email from Dave and Dawn Campbell on or about 10/28/23 concerning Mrs. Betty Dunn. (See Ex. 7)

11. The preponderance of evidence incriminates Mr. Turnbough in the scheme associated with the Dunns.

**III. The evidence sought in the subpoena has direct relevance upon the case(s). There is a Conspiracy to Retaliate Against Dave and Dawn Campbell by O'Dell, Turnbough, et al.**

1. I hereby fully incorporate the foregoing paragraphs as if being stated herein.

2. The information sought in the subpoena is tied to the issues at hand in the four pending case(s) and provides at least a preponderance of evidence of a conspiracy to retaliate.

3. The requested information could be used to prove key elements of my conspiracy defense.

4. I intend to subpoena Mr. Turnbough if there is a Bench Trial in these matter(s).

5. In addition to making a public false allegation against my wife and me, which is the information sought by the subpoena, Mr. Turnbough has been personally involved in the matter of Betty Dunn since at least the summer of 2023.

6. The following is an outline of the conspiracy to retaliate, proving the requested information directly relates to my defense in the case(s):

**A. Retaliation against Defendant on April 01, 2024:**

1. Campbells were participating in protected activity on 04/01/24 of addressing the City of Mammoth Spring during a City Hall meeting, where Campbells were on the

agenda to discuss a neighboring 14' fence. Campbells also informed the board and mayor about the 11/30/23 break-in at 435 Bethel Avenue and the pit-bull attack against Campbells in September of 2023. The mayor shut Campbells down by stating they were "done" and then alleged complaints were made against Campbells. Dawn Campbell asked Mayor Busch to state the subjects of the alleged complaints and Mr. Busch responded by alleging Campbells have no friends where Campbells live, including Mrs. Betty Dunn. Dave Campbell touched Dawn Campbell's elbow to guide her from the room and MSPD Chief Turnbough yelled to Dave Campbell, "*DON'T EVER TOUCH YOUR WIFE LIKE THAT AGAIN.*" Ms. Rogers was the acting recorder/treasurer on 04/01/24 and caused the minutes to fraudulently contain the signature of the elected recorder, June Grant. **(Ex. 10) (Ex. 6, P. 9)** June Grant was not present on 04/01/24. On 04/15/24, Ms. Rogers, et al received a preservation notice for the 04/01/24 video with notice of pending litigation. Ms. Rogers waited until 04/22/24 to notify the security company of Campbells' preservation notice for the 04/01/24 video. **(Ex. 4, P. 2)** Mayor Busch confirmed the 04/1 video was preserved. **(Ex. 4, P. 1)**

2. On 04/01/24, O'Dell, Turnbough, et al retaliated against Campbells for complaining about issues Campbells have within the City of Mammoth Spring. James Turnbough's court filing reasoning for 'Dave's 'aggression' conflicts with Barry O'Dell's 6/10/24 city hall reasoning for Dave's 'aggression'. Mr. Turnbough alleged in his 07/16/24 S.L.A.P.P. action Dave Campbell "*aggressively attempted*" to touch Dawn Campbell on 04/01/24, which caused him to make his out-of-line order. Mr. Turnbough,

et al are conspiring to paint Campbells in a false light of “domestic violence” in retaliation for complaining against the Mammoth Spring Police Department, et al. When Turnbough, et al caused Dave Campbell’s unlawful arrest, the Fulton County Sheriff’s Office fraudulently entered the three alleged “battery” charges as one “domestic battering” charge. Mr. Turnbough and Sheriff Jake Smith ignored Campbells’ request on or about 09/07/24 to correct the fraudulent “domestic battering” entry and failed to ever correct the fraud. After more complaining to another deputy, the fraud was supposedly corrected approximately six weeks later. The damage is done, because third-party websites continue to rebroadcast the fraudulent charge against Dave Campbell. The 04/01/24 preserved video exonerates Campbells, because it proves Turnbough, et al’s maliciously placed Campbells in a false light of domestic violence. Turnbough aided and abetted with the deletion of the 04/01/24 video evidence. On 01/03/25, Councilman Barry O’Dell admitted the preserved 04/01/24 video was deleted after 04/30/24. **(Ex. 30, P. 44)** The video was noticed to be preserved on 04/15/24. **(Ex. 1)**

**B. Retaliation against Campbells on June 10, 2024:**

1. Campbells opposed Turnbough’s 04/01/24 unlawful act, as set forth above, and the practice of the mayor, cops, city attorney and council enabling Turnbough’s unlawfulness. Campbells mailed letters requesting redress to Turnbough, et al. Four of Campbells’ letters were refused. For the 06/10/24 council meeting, Ms. Rogers made copies of Campbells’ letters seeking redress and intentionally caused the letters to be distributed to citizens. The mayor and council, under color of law, violated Campbells’ 1<sup>st</sup> Amendment Right of Freedom of Speech and made false allegations against

Campbells. On 06/10/24, the Council berated Campbells for sending letters seeking redress to humiliate Campbells in front of the large audience. Councilman O'Dell admitted on his public Facebook page on 01/03/25, the 06/10/24 speech was made against Campbells, due to the letters Campbells served the City reps seeking redress. **(Ex. 30, P. 44) (Ex. 13)**

2. Turnbough, et al participated in the retaliation against Campbells by creating and distributing copies of Campbells' ignored letters seeking redress. City Hall representatives wanted citizens to have Campbells' letters, yet refused four of Campbells' mailed letters and O'Dell failed to include his hateful and inciting emails to Campbells. **(Ex. 14)** O'Dell admitted to retaliation on 01/03/25 in a Facebook post stating his speech was made against Campbells for sending resignation requests. **(Ex. 30, P. 44)**

**C. Barry O'Dell, James Turnbough, Melissa Rogers et al Conspired to Retaliate: In a Defamation Campaign Against Dave and Dawn Campbell:**

1. I hereby incorporate "*Defendant's Statement of the Case In Support of Opposition to Turnbough's Motion to Quash*" filed herewith as if being stated herein.

**IV. Mr. Turnbough's motion does not state a legal basis for quashing subpoena.**

1. Without knowing the facts in my defense, Mr. Turnbough prejudicially misjudged the relevancy of the sought information.
2. Mr. Turnbough's motion to quash the subpoena is prejudicial to me and if granted, it will result in my suffering from not being able to fully present my defense.
3. The prosecution's actions against me are 100 % fraudulent and made in a conspiracy to retaliate against me. If James Turnbough is permitted to conceal relevant and exonerating evidence, I will be prejudicially deprived of due process of law.

4. If Mr. Turnbough is conspiring to defame Dave and Dawn Campbell, then it is natural Mr. Turnbough would oppose proffering any information in support of Dave Campbell's defense.

5. Considering Mr. Turnbough is a chief of police, his attempt to conceal relevant facts provides a preponderance of evidence to indicate a conspiracy to retaliate to cause my unlawful arrest so my wife could be placed in a false light of "*domestic violence*," which is what happened. (Ex. 22) Turnbough falsely accused me on 04/01.

6. Turnbough's attempt to evade producing relevant discovery material provides a preponderance of evidence to indicate Turnbough is guilty of unlawfully conspiring with Randy Dunn and Gary Dunn.

**V. Broad Discovery is Allowed; therefore, Turnbough's Motion lacks Merit:**

1. Discovery rules are intended to be broad to allow parties to access relevant information even if it appears peripheral at first glance.

2. Turnbough failed to prove the requested information is clearly irrelevant or unduly burdensome.

3. The party seeking to quash a subpoena has the burden to demonstrate the requested information is clearly irrelevant or unduly burdensome, which Mr. O'Dell failed to do.

4. When someone calls someone a liar, it is not burdensome to substantiate the allegation; it is ethical. Mr. Turnbough's allegation Campbells are liars without supporting his allegation is highly unethical and a violation of his sworn oath. Mr. Hass' attempt to protect Turnbough's abuse is also unethical and should have repercussions.

**VI. Turnbough's Motion To Quash is Flawed and Misinterprets the Law:**

1. I hereby incorporate the foregoing paragraphs as if being fully stated herein.

2. I hereby incorporate my "*Memorandum of Authorities in Support of*

*Defendant's Opposition to Turnbough's Motion to Quash Subpoena*" as if fully stated herein.

**VII. Defendant's Subpoena is not overly broad or burdensome:**

1. Defendant's subpoena is not unduly burdensome or overly broad.
2. To the public at large, Turnbough falsely accused Defendant, et ux of lying, which is devastating to Campbells' good character. Turnbough intentionally harmed.
3. The subpoena simply requests Turnbough to support his defamatory allegation.
4. If a chief of police is capable of publicly slandering a citizen he does not like, the chief of police is capable of conspiring with others to cause an unlawful arrest.
5. In these charges, Turnbough conspired with others to cause my unlawful arrest, in an act of retaliation.
6. It is disturbing a chief of police would dare call citizens liars without supporting such a bold allegation. That is what James Turnbough is attempt to do.
7. As evidenced by the aforesaid, Defendant's subpoena is reasonably limited and necessary to the case.

**VIII. The Requested Information in the Subpoena could lead to admissible evidence.**

1. I hereby incorporate the foregoing paragraphs as if being fully stated herein.
2. Turnbough's alleged lie about Campbells will shed light on the facts surrounding the pending charges against Dave Campbell.
3. James Turnbough aided the fraud of Melissa Rogers, who sued Dave and Dawn Campbell in a fraudulent injunction request on 07/16/24. Turnbough and Rogers

made up the quote alleged in their Injunction Requests, which Campbells never stated. Each fraudster sickly alleged Campbells' quote on a sign was, "*Jamie and Melissa get it on.*" Before their amendments to remove the fraud after they were called out for it, Mr. O'Dell stopped by our house on 08/02/24, which is the day of my arrest, accusing us of not having the "*pimp*" sign on our website. Mr. O'Dell appeared to accuse us of hiding pictures of our previous messages, while appearing to insinuate he has a copy of the sign containing the message falsely alleged by Mr. Turnbough and Ms. Rogers. The day of my arrest, Mr. O'Dell stopped by and informed me he is compiling information by, or about me. Therefore, evidence of the lie alleged by Turnbough and O'Dell is relevant.

4. Defendant's "*Factual Allegations*" filed with Defendant's Rule 18.3

Disclosures relies extensively on facts surrounding Mr. Turnbough and Mr. O'Dell.

5. Defendant's Rule 18.3 Disclosures, disclosed: "*My primary defense during a bench trial will show a conspiracy against me and my wife to retaliate against us, defame us, place us in a false light of "domestic battering" and falsely portray me as being 'aggressive.'* FCSO fraudulently entered 'domestic battering' against me. On 04/01/24, MSPD Chief Turnbough caused us to appear in a false light of domestic abuse. On 07/16/24, Chief Turnbough and City Secretary Melissa Rogers filed fraudulent injunction requests seeking to bar us from a statement we never made. In his S.L.A.P.P. suit, Chief Turnbough alleged I 'aggressively attempted' to touch my wife. Lauren Siebert, with KSAR falsely broadcast injunctions were filed against us for committing defamation on a sign, despite only requests being filed. Ms. Siebert published a false story about me and my wife. The file for Ms. Siebert's story was created about a week before the filing of Rogers' and Turnbough's injunction requests. The concealed, forged

*affidavit proves it.*” (See Defendant’s Rule 18.3 Disclosures, P. 5, Item 9)

6. “On 04/15/24, Campbells served a Preservation Notice for the 04/01/24 Council Meeting audios/videos. (Ex. I) Chief Turnbough, et al destroyed preserved evidence of the 04/01/24 incident. Mayor Busch confirmed in May of 2024 the video was preserved when he attempted to charge Campbells well over a hundred dollars for the video. Chief Turnbough, et al caused an adverse inference against himself, et al for spoiling the 04/01/24 video evidence he knew Campbells noticed to be preserved. Mammoth Spring City Councilman, Barry O’Dell, made a Facebook post on 01/03/25 admitting, ‘The 4-1 video they claim city council destroyed. The security company deletes videos after a month. They cannot keep it forever.’ The 4/15 preservation notice was served weeks before the video was destroyed.” (See Factual Allegations, P. 8, No. 24-27) (Ex. 30, P. 44)

**IX. In Opposition to Each Argument Raised in the Motion to Quash:**

1. Turnbough is a valuable witness in these alleged charges; therefore, the subpoena for his alleged lie is of utmost relevancy.
2. Turnbough’s argument is, the subpoena is “*oppressive*” and “*unreasonable*” because “*Movant is not an eyewitness, complaining witness, nor has any involvement what-so-ever with Defendant’s current criminal cases in this Court and of which the ‘subpoena’ was issued.*” Turnbough’s involvement in this Court will be as a sworn witness on the stand. Turnbough is material witness simply for stating so many lies to the 911 Dispatcher on 07/16/24 when he unconstitutionally stood down to my plea.
3. Turnbough is a witness to Gary, Randy and Brenda Dunn’s trespass at 435

Bethel AV on 07/16/24. Turnbough also witnessed the fraud against Campbells on 04/01/24, which triggered Turnbough to sue Campbells on 07/16/24 in a fraudulent injunction request and to lie to 911 on 07/16/24 concerning Campbells. Turnbough must be questioned under oath during a trial. Turnbough has key evidence which exonerates.

4. Barry O'Dell admitted on 01/03/25 the 06/10/24 retaliation was because we sent resignation requests. On 07/16/24, Chief Turnbough and Melissa Rogers filed a fraudulent SLAPP action seeking an injunction for something we never stated. On 07/16/24, Chief Turnbough lied to 911 about: 1) not having officers available to respond to my 911 plea; 2) him allegedly not being allowed at 435 Bethel AV; 3) Defendant allegedly instructing him "*not to go on a call.*" 4) Turnbough concealed his and Rogers' lawsuits filed that day. Mr. O'Dell, Chief Turnbough, et al knew Gary, Randy and Brenda Dunn were trespassing on 07/16/24. The 911 Dispatcher reminded Turnbough on 07/16/24, Randy and Gary Dunn are not supposed to be at 435 Bethel AV with Betty Dunn. Dispatcher Hutchinson reminded Turnbough, "*We've been through this a dozen time,*" to which Turnbough agreed. (See Ex. 29, P. 1, L. 1-17)

#### **X. Conclusion:**

1. I would suffer prejudiced if James Turnbough's motion is granted, because I will be deprived of fully preparing my defense, which will result in harming my defense and causing suffering.

2. The evidence proves there is no merit to the alleged charges. The State is relying on fraud which the Secretary of the State already shined a light on. The alleged victims in the alleged charges are proven trespassers. O'Dell was notified of the Dunn sons trespass on 10/28/23 and suspiciously ignored the notice, while obviously conniving

against the law to frame Dave Campbell in false charges on behalf of known trespassers. Turnbough was notified by Betty Dunn in the summer of 2023, her sons are not welcome.

3. Clear and convincing evidence, beyond a reasonable doubt, indicates James Turnbough made an agreement with multiple people to defame Dave and Dawn Campbell. Dave Campbell's arrest is riddled with fraud in every facet: The Dunn trio were trespassers on 07/16/24; Officer Crawford lied there is no evidence, while being notified on camera the entire 07/16/24 incident is recorded; Crawford and "Investigator" Smith refused to look at Campbells' 7/16/24 video evidence. Both officers were notified it exists. It is unconstitutional for a cop to neglect viewing the "*totality of the circumstances*" and actually create fraud in order to conceal facts from the case, as Officer Crawford did. Investigator Smith advised Campbells not to file charges against the Dunn trio, while alleging it would be a "*he said/he said*" scenario. Smith was then reminded of the 7/16/24 video and remained silent. When Betty Dunn informed Investigator Smith and Officer Crawford on 07/16/24, she wished to file charges against Randy Dunn for breaking into her home, the two officers refused, alleging there is no such charge for breaking into a home unless something is taken from the home and Mrs. Dunn could not prove anything was stolen.

4. It is beyond a reasonable doubt, the police, council and city attorneys for the City of Mammoth Spring are aiding Amanda, Charles, Randy, Gary and Brenda Dunn in their abuse against Betty Dunn and conspiracy to defame and harm Dave and Dawn Campbell.

5. Barry O'Dell was notified on 10/28/23 by Dave and Dawn Campbell of Betty Dunn's friction with her boys. O'Dell was notified on 10/28/23, "*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...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.*” (See Ex. 7) The fact Mr. O'Dell ignored the foregoing information and permitted Gary and Randy Dunn to go to 435 Bethel Avenue when they said they were going to place “no trespassing” signs on 07/16/24, which resulted in my unconstitutional arrest, provides a preponderance of evidence to show Barry O'Dell is involved in the falsity's surrounding my unconstitutional arrest.

6. O'Dell and Turnbough's plot to harm me is evidenced by viewing the first minute of the 07/16/24 video evidence, which proves I was assaulted by O'Dell and Turnbough's buddy, Gary Dunn, with a deadly weapon. The 7/16/24 video further shows Randy and Brenda Dunn's offensive personal contact against me causing themselves to be pushed off, which is a natural defense. The fact the City's players are persisting in their fraud scheme evidences O'Dell, Turnbough, et al's conspiracy to retaliate.

7. The fact no one is acknowledging the facts in front of them proves the verified facts of the conspiracy to retaliate with the fabrication of the alleged charges in a defamation campaign to destroy Dave and Dawn Campbell. O'Dell advertised this fact in his evil prayer for God to destroy O'Dell's adversaries, who are also God's children.

8. Turnbough is incriminated in this matter, because on 06/10/24, O'Dell stood on his soapbox before a packed house and alleged I lied about my wife's arm. (Ex. 5) O'Dell's bizarre allegation matches Turnbough's bizarre allegation in his Cause No. 25CV-24-73, swearing I “*aggressively attempted*” to touch my wife. (Ex. 26-27) Another bizarre fact in these alleged charges is, FCSO fraudulently entered the charges filed by people who ARE NOT family as “*Domestic Battering.*” (Ex. 22) The most bizarre fact is, Prosecutor Smith alleged in his opposition to my Motion to Dismiss, the

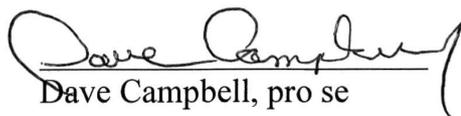
four misdemeanor charges constitute a "*felony*." I object to Mr. Smith's fraud upon the court and request dismissal based on Mr. Smith's fraud, as well as the forged affidavit he bizarrely clings to. Mr. Smith's 03/07/25 letter to me bizarrely opens with, he is finished communicating with me pertaining to his bogus criminal actions. Therefore, based on Mr. Smith's unconstitutionality, these alleged charges must be dismissed. The fraud enacted by an abundance of characters proves the conspiracy to retaliate. O'Dell and his Facebook "*friends*" make no secret they despise Campbells' protected speech and want it stopped **NOW**. One "*friend*" appeared to call for a lynching. Another sought to gang up to remove Campbells' sign. For an alleged "*Christian*," O'Dell displays evil.

9. Should these criminal charges proceed, Turnbough would be a critical witness among many. Answering my subpoena will mitigate witness time and save resources.

10. Therefore, for the reasons set forth in the foregoing paragraphs, the subpoena to James Turnbough to provide his alleged lies he advertises I stated should not be quashed. The evidence being withheld by Turnbough is critical to my self-defense and safety in the town I reside in. Turnbough is falsely instigating hatred against me.

WHEREFORE, I respectfully pray the Court deny Mr. O'Dell's Motion to Quash the Subpoena and allow the discovery to proceed as requested. I pray for any other relief authorized by law.

Respectfully Submitted,



Dave Campbell, pro se  
440 Main ST,  
Mammoth Spring, AR 72554-8800  
Blues24Seven@ymail.com  
(870) 907-0572