

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 ~~WG~~-24-285**

Dave Campbell,

Defendant.

**DEFENDANT’S APPENDIX OF EXHIBITS TO
OPPOSITION TO MOTION TO QUASH FILED BY TURNBOUGH**

Audio/Video And Document Preservation Request – 04/01/24 Video Evidence	Ex. 1
FOIA Request to Official June Grant and Tampered w/ by Melissa Rogers	Ex. 2
Another FOIA Request to Ms. Grant Tampered w/ By Melissa Rogers	Ex. 3
City’s Response to FOIA Request Dated 04/23/24	Ex. 4
Councilman O’Dell’s Unconstitutional Public Shaming Stunt	Ex. 5
City’s Response Dated 06/21/24 alleging 4/1 video “no longer available”	Ex. 6
04/01/24 Meeting Minutes Failing to allege an incident or “Aggression”	Ex. 6, p. 9
10/28/23 Ignored Email to O’Dell about Betty Dunn’s Fall and sons	Ex. 7
09/15/23 Ignored Letter to City About Loose Pit Bull Dog Attack	Ex. 8
06/10/24 Unsigned Meeting Minutes excluding O’Dell’s Public Shaming	Ex. 9
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O'Dell's 06/06/24 " <i>Correct your records. I am not a pastor</i> " email	Ex. 14
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Mike Brown Defamatory Facebook Post	Ex. 16
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Questionable POA Against Betty Dunn by Amanda Dunn	Ex. 18
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Randy Dunn revealed City's fraud by stating prematurely, " <i>a warrant's out</i> "	Ex. 20
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O'Dell's 05/28/25 petty public post expressing anger over Campbells' sign	Ex. 30, P. 1
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O'Dell ignored friend who asked if he'd heard the term " <i>Public servant</i> "	Ex. 30,P. 7
O'Dell's compromised post with friend stating " <i>this needs to be squashed</i> "	Ex. 30, P. 9
O'Dell's 06/08/24 post showing he is consumed with Campbells' sign	Ex. 30, P. 10
O'Dell's 06/10/24 post falsely alleging he was called " <i>homosexual</i> "	Ex. 30, P. 14
O'Dell's 06/11/24 public allegation Campbells' lied without stating lies	Ex. 30, P. 22
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AUDIO/VIDEO AND DOCUMENT PRESERVATION REQUEST

MEMORANDUM OF NOTICE

To: City of Mammoth Spring Records Custodian (served to:
cityofmammothspring@gmail.com)
(also served to: City Attorney Dewayne Plumlee at plumleelaw@gmail.com);
(hand-delivered on 04/15/24 to Mammoth Spring City Hall)

From: Dave and Dawn Campbell
440 Main Street
Mammoth Spring, Arkansas 72554
blues24seven@ymail.com
(870) 907-0572

Defendants'
Exhibit
1

Date: April 15, 2024

Subject:

Litigation Hold Notice and/or Preservation of Documents Request For All Documents Associated with Dave and Dawn Campbell (440 Main Street, Mammoth Spring, Arkansas) In All Media Formats From December of 2020, Through Present Date. This Notice Is to Specifically Preserve the Audio and Video of the Mammoth Spring City Hall meeting room and foyer from 5:00 p.m until 9:00 p.m on 04/01/24 and the March 26, 2024 Phone Call Between Officer Barnett and The Campbells.

This Memorandum of Notice is to inform you about potential litigation involving Dave and Dawn Campbell (the "Dispute") and your legal obligation to preserve documents related in any way to the Dispute. In addition to paper and electronic documents associated with Dave and Dawn Campbell, please preserve any video and audio recordings pertaining to Dave and Dawn Campbell. Specifically preserve the audio and video of the 04/01/24 City Hall meeting room and foyer from 5:00 p.m. until 9:00 p.m. Please preserve any documentation (i.e: recordings, notes, etc.) pertaining to the March 26, 2024 phone call between Officer Barnett and Dave and Dawn Campbell. You have been identified as a person who may possess relevant documents and/or data and you are required by law to preserve all documents related to the Dispute.

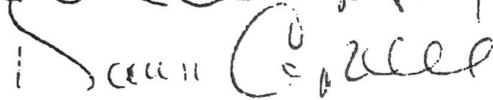
You are directed to preserve documents, information and all data pertaining to Dave and Dawn Campbell and the ongoing case (this includes any video recordings, audio recordings, emails, documents, notes, or other correspondence) relating to the Dispute as provided in this Memorandum.

EXHIBIT 1

These obligations will remain in effect until you receive a subsequent written notice that this Litigation Hold has been updated, modified, or released. It is our understanding, failure to preserve documents and information relating to a known dispute could potentially expose one to sanctions and/or legal liability. Accordingly, if you have any questions, or concerns about the obligation to preserve documents and information, please contact Dave and/or Dawn Campbell at one of the options listed.

Thank you in advance for your cooperation.

Respectfully

Dave and Dawn Campbell


COPY RECEIVED@CITYHALL

Defendants'
Exhibit
1

ebay

MAMMOTH SPRING TREASURER
% CITY HALL
160 NO MARKET FIRST
MAMMOTH SPRING AR
72554

11528 TRACK RETURN #



9500 1104 4576 4189 4222 42


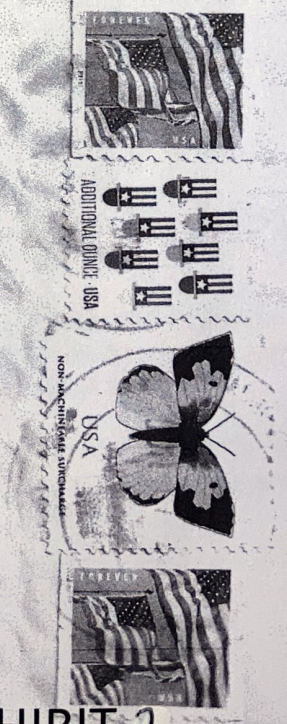



EXHIBIT 2

Duly-Elected Recorder (not deputy recorder)
City of MUMFORD SPRING
160 N FIRST ST
MUMFORD SPRING AR
72554

MONITORING

Opened by
mistake -
HOOPER #
BAGG
MII

City of Mammoth Spring

DANNY BUSCH
MAYOR

JUNE GRANT
RECORDER / TREASURER

DEWAYNE PLUMLEE
CITY ATTORNEY

325 MAIN ST.
P.O. BOX 185

MAMMOTH SPRING, ARKANSAS 72554

PHONE: (870) 625-3518

FAX: (870) 625-7566

E-mail: cityofmammothspring@gmail.com

COUNCIL MEMBERS:
ADAM DAVIS
THOMAS OWSLEY
ROBBY BENNETT
BARRY O'DELL

Dave & Dawn Campbell
440 Main Street
Mammoth Spring, AR 72554

April 23, 2024

Mr. & Mrs. Campbell,

Please find the following in response to your Freedom of Information Act request dated 4/17/2024 and received via mail on 04/22/2024.

- The city does not maintain handwritten, electronic, typed, audio recorded records of activities within Mammoth Spring City Hall or the Mammoth Spring Police Department. Video only recordings are kept only within the Mammoth Spring City Hall Lobby. This information has been requested (see included document) from the company who maintains our security system. The security company will pull this footage, however previous pulls have cost the city between \$93.00 - \$145 per incident. This amount includes the pulling of the footage, the USB drive, and all applicable taxes. This cost will be passed on to the party making the request. Please advise the City if you would like to continue with this request.
- In regards to the April 1st Council Meeting held inside the Courtroom of the Mammoth Spring City Hall, video only footage has been requested, again, for a fee that will be passed on to the party requesting the footage. Please find the minutes for the April council meeting included. These minutes have not been received final approval from the council members, therefore, the attached minutes are unofficial.
- The Mammoth Spring Police Department does not wear body cameras.
- The City of Mammoth Spring and the Mammoth Spring Police Department does not record phone calls; therefore, no information is available regarding the conversation with Officer Barnett.
- Complaints between two parties are verbalized to officers or city officials. Unless criminal charges are involved, documentation is not present and should be treated as a civil matter. No documents are present regarding citizen complaints on Mr. and Mrs. Campbell as no criminal charges have been made.
- Concerning the dates of December 6, 2023 and March 22, 2024, police were present in an effort to prevent criminal activity. The issues present were a civil matter, not criminal, therefore no documentation exists.

Respectfully,



Mayor Danny Busch

Defendants'
Exhibit
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EXHIBIT 4

June 10, 2024 Mammoth Spring City Council Meeting Preacher/Councilman Barry O'Dell Segment:

PREACHER COUNCILMAN BARRY O'DELL: There's a lot of information out there when y'all walked in – some paperwork. Some issues—Well, I mean the —So, it's – Basically, what it is – It's a request by the Campbells who are here tonight, for all the city council, the mayor, the police department and the county attorney to resign because of corruption. Now, they have no legal standing. They have nothing by which they have any right to make that request. Uh, so it – it – it means nothing. But there have been quite a few issues. And I asked if I could speak, because my name's on their little billboard right now. Uh, it's been – The billboard has been rather petty, immature. Uh, I have other adjectives, but that's sufficient; petty and immature. Uh, they proclaim themselves to be defenders of the 1st Amendment. But, we've all got the 1st Amendment. Uh, but when you start attacking people personally – So, multiple names have been put on that. My name is up there currently. Uh, as you know, I was voted in on city council. I've also been in this community for 10 years as a gospel preacher at the Mammoth Spring Church of Christ. The current sign says, Barry: Leader of City and Church confirms flitty self – flitty self posts pictures of Dave's rear on WW – World Wide Web. So, if any of you take time to look up the meanings of terms, the word flitty means ostentatiously homosexual. So, they have on their billboard --

DAWN CAMPBELL: You need to tell them about all the definitions; the first and second.

PREACHER COUNCILMAN BARRY O'DELL: You're not -- This is not your time. This is not your time. So their billboard is accusing me of being, uh, homosexual.

DAWN CAMPBELL: It is not. That is a lie.

MAYOR DANNY BUSCH: Ma'am.

PREACHER COUNCILMAN BARRY O'DELL: This is not your turn to speak.

DAWN CAMPBELL: Well, don't lie about it.

PREACHER COUNCILMAN BARRY O'DELL: I'm not. The word flitty – Anybody can – you got Google. Search it. Okay? Search it.

UNKNOWN CITIZEN: It does say that.

DAVE CAMPBELL: It's one of the definitions.

PREACHER COUNCILMAN BARRY O'DELL: SHHHHHHH.

DAWN CAMPBELL: Unstable.

PREACHER COUNCILMAN BARRY O'DELL: That's enough.

MAYOR DANNY BUSCH: One more –

BARRY O'DELL: Unstable.

MAYOR DANNY BUSCH: One more outburst -- Jamie.

PREACHER COUNCILMAN BARRY O'DELL: So, I know what it means, because the sign says, *"posted a picture of Dave's rear."* Well, he happened to be – I was driving by. See, a friend of mine told me he said, hey, they're putting up a sign. And So, I've got two pictures of him in the process of making the sign. It wasn't finished yet. And when I drove by –uh, this other sign -- He was bending over picking up the letters and so I just snapped a picture of the sign. I wasn't snapping a picture of his rear, which they put on their little sign. So, this is what they're accusing me of. They've put my name, my work, my reputation on their board. And again, it's childish. I understand that. Part of the problem, though – Part of the problem is that too many good people – oh, just let it go. Just let it go. Well, several signs have let -- been let go. And that's fine. Uh, I'm not letting this go, just so you know. We had a good relationship. I bought – How many times have I been to your place? I bought your product.

DAVE CAMPBELL: Too many. He asked me a question.

MAYOR DANNY BUSCH: (Laughing)

PREACHER COUNCILMAN BARRY O'DELL: Okay. Well, apparently you don't like money then.

DAVE CAMPBELL: Not your money.

PREACHER COUNCILMAN BARRY O'DELL: 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. And you were called out for

your aggressive behavior. Rightfully so. And so you've thrown around a few codes and you've thrown around a few lines like, "*color of law*." And you have no legal basis. Uh, you acted like children. Uh, – and -- and -- and now you've put my name and my reputation up on your little board. And if you think that as a Christian my job is just to take it, you're -- you're wrong. So Christians are not pushovers, nor are we doormats. And you put something like that up there about me. And, uh, I mean people can see it. And people have all the information. I can share the email exchange where you guys are again petulant –

DAWN CAMPBELL: (whispering) This is weird.

PREACHER COUNCILMAN BARRY O'DELL: -- petulant and self aggrandizing, arrogant. Uh, again, I have several words, but you accused City Hall of several things that are just untrue. Again you have no legal standing. I don't know what you think you have, but you have nothing. And so you can record, you can post your signs, you can do whatever you want. But it's been, you know, several signs. Several names have been pointed out and -- well, uh, it would be nice if people would act like adults and, uh, act like responsible citizens and not -- not be so petulant. That's -- That's -- That's what I have to say. And -- and -- and I'll say this, too. Thank you for being here. I appreciate -- City Hall, thank you all for being here. These meetings are for everybody. It's for the community, you know, so we want you here. If you have questions or issues, that's why we're here. We're here to dialogue with you. So, feel free, now when you come in with a dialogue of -- of -- how would you say it? When you come with a dialogue of aggression and after you've made your accusations against us and against the police department, after every accusation you have a childish insult, you're -- you're probably going to get shut down, because we're not here to tolerate -- we don't have to tolerate that kind of behavior. So, thank you for being here.

(There was sporadic clapping.)

(END OF PROCEEDINGS)

City of Mammoth Spring

DANNY BUSCH
MAYOR

JUNE GRANT
RECORDER / TREASURER

DEWAYNE PLUMLEE
CITY ATTORNEY

325 MAIN ST.
P.O. BOX 185

MAMMOTH SPRING, ARKANSAS 72554

PHONE: (870) 625-3518

FAX: (870) 625-7566

E-mail: cityofmammothspring@gmail.com

COUNCIL MEMBERS:

ADAM DAVIS
THOMAS OWSLEY
ROBBY BENNETT
BARRY O'DELL

Dave & Dawn Campbell
440 Main Street
Mammoth Spring, AR 72554

June 21, 2024

Mr. & Mrs. Campbell,

Please find the following in response to your Freedom of Information Act request dated 06/17/2024 and received via mail on 06/18/2024 packaged in an eBay envelope with no return address.

- The April 1, 2024 meeting video is no longer available.
- A signed copy of the April 1, 2024, council meeting minutes, as approved by the Mammoth Spring City Council on May 7th, 2024, is included.
- A copy of the June 10th, 2024, meeting minutes are included, but are "UNOFFICIAL". These minutes will be approved or modified on July 1st, 2024, at the regular monthly council meeting.
- The documents made available to the public during the meeting were letters sent to individual employees and council members along with the mayor's request to resign. Also made available to the public was an email exchange between the Campbell's and Alderman O'Dell. Because these documents were sent to the persons; the city does not have a copy. We are including the copies of the letters that were presented to the city that were displayed for the public at the open meeting. Also included is a copy of the meeting agenda which was also made public. Information for the public is laying

Defendants
Exhibit
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EXHIBIT 6

on a table in the lobby and is free to anyone wishing to pick it up prior to coming into the council room or on the way out following the meeting.

- Copies are completed for citizens free of charge. This policy was changed when former Mayor Charles Vaughn took office in 2019. Prior to that, copies were .05 per page.

- Video was downloaded on 06/19/2024 by our security company. A bill for the footage will be forwarded via mail for the download when it is received. Upon receipt of payment, the video will be mailed to your address. This video is for the lobby of city hall and the council meeting room from 4:30p.m. to 6:00p.m. Cameras are not available inside the "clerk's office". Recorder/Treasurer Grant is on video recording the audio of the meeting, however, upon request of the recording, City Hall was notified that the audio was no longer available due to the recorder being dropped during the meeting. At this time, audio is unavailable and this incident is being looked into. If the audio is retrieved, a copy will be mailed to your address promptly.

- As stated above, the owner of the security system advised you with the previous FOIA request that video is no longer available for the April 1, 2024 meeting.

- The drive that was provided is being returned. Upon untapping it, it was no longer "factory sealed" and we were not able to put it into our system.

Respectfully,



Mayor Danny Busch

Defendants'
Exhibit
6

Council Meeting
April 1, 2024
5:30 p.m.

Defendants'
Exhibit
6

Call to order by Mayor

Roll call – Alderman Thomas Owsley; present, Alderman Barry O'Dell; present, Alderman Adam Davis; present, Alderman Robby Bennett; present

Reports approved – motion by Alderman Thomas Owsley, 2nd Alderman Robbie Bennett; all aye

Minutes approved as presented – motion by Alderman Adam Davis, 2nd Alderman Thomas Owsley; all aye

Council heard from citizens Dave & Dawn Campbell regarding a variety of concerns. Discussion by council on the possibility of implementing an ordinance outlining property fence restrictions, and revising ordinance on dogs/vicious dogs.


Permission requested to destroy 2016 records – motion by Alderman Barry O'Dell, 2nd Alderman Robbie Bennett; all aye

Ordinance 2024-01; closing 10th street from Archer Avenue to Walker Avenue placed on 1st read – motion by Robbie Bennett, 2nd Adam Davis; all aye. Roll Call Vote: Alderman Thomas Owsley – Yes, Alderman Adam Davis – Yes, Alderman Barry O'Dell – Yes, Alderman Robbie Bennett – Yes. Ordinance will be placed on May agenda for 2nd read.

Permission to hire summer workers Gareth O'Dell and Blake Rogers for 24 hours/week at \$11.00/hour beginning at the end of the school year – motion by Alderman Adam Davis, 2nd Alderman Robbie Bennett; all aye.

Due to the May Council Meeting conflicting with the Mammoth Spring High School Graduation, the council meeting will be on May 7th at 5:30pm – motion by Alderman Thomas Owsley, 2nd Alderman Barry O'Dell; all aye.

Motion to adjourn made by Alderman Adam Davis, 2nd by Thomas Owsley; all aye.



Danny Busch, Mayor



M. June Grant, Recorder/Treasurer

An Update and Prayer Request For One of Your Church Members



From <campbell@ilovejesus.com>

To <mscoc251@gmail.com>

Date 2023-10-28 09:33

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

(870) 907-0572

Dave / Dawn Campbell
PO Box 13
Mammoth Spring, AR 72554-0013
870-907-0572
Blues24Seven@ymail.com

Defendants'
Exhibit
8

September 15, 2023

REF: Staffordshire terrier Attack with Owner

Mammoth Spring City Hall
Mammoth Spring Police Department
100 Main Street
Mammoth Spring, AR 72554
870-625-3518

Good Morning: ~

We are filing a formal complaint against a man and his dog, who we believe reside at 355 Bethel Street. We believe the dog is a Staffordshire Terrier. On September 14, 2023, approximately between 9:00 and 10:00 a.m., we were walking home via the alley behind our home from the doctor's office when a Staffordshire Terrier, with blood in his eyes, charged into the alleyway at us obviously intending harm. With only seconds to react Dave connected with a kick to the canine's lower jaw, as the dog was about to bite, causing the dog to yelp and run the other direction. The apparent owner was right behind the canine also with malice in his eyes verbally threatening us for kicking his uncontained and outlawed Staffordshire Terrier.

We were busy yesterday and could not report efficiently. We took the time last night to learn of the destructive and outlawed character of this PIT BULL breed. The Staffordshire Terrier breed is illegal in Mammoth Spring and we expect the canine to be picked up and banished from the city limits of Mammoth Spring as required by Ordinance 6.04.19, titled vicious dogs, other animals.

Fortunately, we were the ones the canine attacked. On a follow-up walk we witnessed an elderly man walking his little pup by the carwash and cringed at the prospect injuries had they turned down the alley, or the Staffordshire caught wind of these passersby. Our elderly neighbor talks of walking downtown and it terrifies us she could be attacked by this pit bull dog. When one walks by the yard of the outlawed canine they are oblivious to the stark danger that lurks. We cannot distinguish the worse of the pair as the apparent canine owner was completely comfortable with defending his canine with threats of 'kicking our ass'. No fence. No containment. No 4' leash. No control with voice. The man did not attempt to dissuade his dog from attacking us. We will be prepared next time we decide to walk from our yard to town and are concerned for those who happen to walk by this dog unprepared.

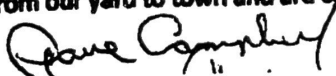


EXHIBIT 8

**City of Mammoth Spring
City Council
June 10, 2024
5:30 p.m.
@ Mammoth Spring City Hall
160 N. 1st Street**

Defendants'
Exhibit
9

- 1. Call meeting to order**
- 2. Review reports**
- 3. Approve minutes from previous meeting**
- 4. Trash Rate Increase**
- 5. Discussion on July 4th holiday**
- 6. Review Title 6 of the Mammoth Spring Municipal Code: Animals**
- 7. Review Chapter 7.44 of the Mammoth Spring Municipal Code: Disturbing the Peace**
- 8. Adjourn**

Exhibit @ 9

EXHIBIT # 9

◀ All INBOXES



Dan Grant

5/13/24

To: Dave Campbell >

Re: Sign on main St.

Hey, sorry to hear about all of your troubles.

June and I both had DR appointments at 3PM in Forsyth, Mo. Apr 1. We were not only out of town but out of the state.

I DON'T know why Ms, Mayor put Junes name on the minutes.

Recording request

1 message

Melissa Rogers <melissar0601@gmail.com>

Mon, Apr 22, 2024 at 11:35 AM

To: "Chip@guarddogsecurity.net" <Chip@guarddogsecurity.net>

Good morning! I am with the City of Mammoth Spring and we have been given an audio/video preservation request. Can you get us the footage from April 1, 2024 between 5:00 and 9:00 pm in our council/courtroom and the lobby? We have the audio turned off, which is fine, we just need the video.

Thank you!

Melissa Rogers

CUSTOMER'S ORDER NO.		DEPARTMENT		DATE			
				5/22/74			
NAME Campbell Kettle							
ADDRESS Mammoth Spring AR							
CITY, STATE, ZIP 440 Main ST							
SOLD BY		CASH	C.O.D.	CHARGE	ON ACCT.	MDSE RETD	PAID OUT
QUANTITY	DESCRIPTION			PRICE	AMOUNT		
1	1	Large - Traveling lady				7 24	
2						7 24	
3	5	Small - Bill Dillard				22 65	
4							
5	1	Small - Pastor - Church of Christ				4 53	
6							
7	1	Small - David & Linda				4 53	
8							
9	1	Small - ^{Got Large 53.00} Small - Carl w/ short change				4 53	
10					Subtotal	43 48	
11	1	Large - Couple from Myrtle Mo				7 24	
12	1	LARGE - MO PCS				7 24	
13	1	Small				4 53	
14						4 53	
15							
16							
17						62 49	
18					Tax	6 54	
19							
20						69 05	
RECEIVED BY							

Dave and Dawn Campbell
440 Main Street
Mammoth Spring, Arkansas 72554
Blues24Seven@ymail.com
(870) 907-0572

June ⁰⁶~~04~~, 2024
DC

RE: Resignation Request/Fraud Rebuke
(served via email: bodell1979@gmail.com)

Barry O'Dell
214 Florence Street
Mammoth Spring, AR 72554

Mr. O'Dell:

We request you to resign from your position with the City of Mammoth Spring effective immediately. Please preserve any notes you have pertaining to the 04/01/24 incident. You were present and saw Mayor Busch and Chief Turnbough attempt to provoke us into rage during the April Fool's city hall meeting. By your silence and failure to stand against wrong, you horribly consented to the mayor and chief's abuse. On 04/01/24, by your condoning, you insidiously and prejudicially dictated, a particular husband is never again to touch his wife's elbow, via your chief of police, who attacked with the erroneous demand, *"DON'T EVER TOUCH YOUR WIFE LIKE THAT AGAIN!"* immediately after a husband touched his wife's elbow upon suggesting they leave the meeting after the mayor stated they were *"done."* You witnessed and sat in silence while failing to stand up to Mr. Busch's absurd false allegation of complaints against us which the mayor falsely alleged are the same as the issues we presented before being shut up by him. By your silence and failure to correct the record on 04/01/24, you aided Mr. Busch's false witnessing against us. You witnessed and consented by silence to Mr. Busch falsely accusing us of trespassing through the yard of a pit bull dog in order to be attacked, because according to Mr. Busch, the alleged electric fence prevented the dog from being in the alley, yet the electric fence did not prevent us, which is incongruous.¹

¹ Mr. Busch responded to a FOIA request for the complaints he alleged during 04/01/24 and he admitted no complaints have been filed against Dave and/or Dawn Campbell. Mr. Busch did not apologize for slandering us during the 04/01/24 council meeting. Mr. Busch has not corrected the record.

We believe you were aware on 04/01/24, the mammoth wall, which borders our property, would be rebuilt. Despite being informed, you failed to correct the record when Mr. Busch falsely alleged the wall was being removed because the Petersons “*want to get along,*” which stifled our First Amendment speech. We were on the agenda to be heard and we were prejudicially and dishonestly deprived from placing objections on the record, to which we object. We believe this was a First Amendment violation.

You witnessed and consented by your silence to Chief Turnbough attempting to escalate the situation into becoming hostile in apparently attempting to make a “*color of law*” arrest against Dave and/or Dawn Campbell. You consented by silence to Mr. Turnbough loudly goading Dave to “*BE A MAN*” and to go back into the meeting, despite repeatedly being told, no by Dave Campbell. Mr. Turnbough’s commotion in the lobby against Dave was so disruptive; Dawn Campbell went into the lobby in an attempt to deescalate.

Arkansas Code, Section 5-71-208 (a) (4) under “*Harassment*” states: “*A person commits the offense of harassment if, with purpose to harass, annoy, or alarm another person, without good cause, he or she: In a public place repeatedly insults, taunts, or challenges another person in a manner likely to provoke a violent or disorderly response.*”

Apparently, Mr. Turnbough’s gross, pimp-like harassment against us and Mr. Bush’s defamatory harassment was to harass, annoy and alarm us in order to provoke a violent or disorderly response in order to make a “*color of law*” arrest, which the city officials lacked good cause to do. Now that we have learned Mr. Doris Brown’s terrifying story, we feel confident the City of Mammoth Spring officials intend to goad us into an arrest, under the “*color of law.*” We believe each witness acting cowardly is in on the plot.

We believe you had a duty to stand up to the corruption you witnessed on 04/01/24 and because you’ve failed to take a stand against corruption and appear to be abetting it, **we hereby request your immediate resignation.** If one does not stand for right, they are enablers of wrong. We rebuke the city’s harassment/fraud and challenge it with gusto. The terrifying attack against us on 04/01/24 caused us to fear for our life and safety. We also request you to immediately resign due to moving city hall with no vote of the people. Please see the enclosed terrifying three-part exhibit.

Respectfully




Dave/Dawn Campbell

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