

Property Detail

Sharp County Personal Property & Real Estate Tax Records

Property Information	
Parcel #:	0018574
Tax Year/ Book:	2023 Delinquent
Legal:	Personal Property
Property Type:	Personal
Owner:	ROGERS WILLIAM & MELISSA
Tax Payer:	ROGERS WILLIAM & MELISSA [REDACTED] MAMMOTH SPRING, AR 72554
Site Address:	[REDACTED]
Subdivision:	
Lot Block:	
S-T-R:	
Acres:	0
Tax Status:	Non-Exempt

▲ This property has delinquent taxes.

For tax amount due, you must call the Collector's Office.

Sharp County Collector: Michelle Daggett
Ash Flat Office: (870) 994-7334

Receipts							
Receipt #	Book	Tax Year	ReceiptDate	Cash Amt	Check Amt	Credit Amt	Total

Michelle Daggett, Collector
Ash Flat Office: (870) 994-7334

Attachment

1

SHARP COUNTY ARKANSAS Proof Of Payment

Taxpayer
ROGERS WILLIAM & MELISSA
MAMMOTH SPRING, AR 72554

Orig Receipt No.: 276988
Amt Paid: Cash Amount \$0.00
Check Amount \$0.00
Credit Card Amount \$634.64
Total \$634.64
Date Paid: 3/1/2024

Parcel Info

Parcel/PPAN: 0018574
Tax Year: 2022
Property Type: Personal
Owner Name: ROGERS WILLIAM & MELISSA
Property Address: [REDACTED]
Subdivision:
Lot:
Block:
Sec-Twp-Rng:
Acres: 0
Legal Description: Personal Property

Tax Type	Taxes Owed	Taxes Paid	Taxes Balance
Ad Valorem	\$575.58	-\$575.58	\$0.00
Advertising Cost	\$1.50	-\$1.50	\$0.00
Penalty	\$57.56	-\$57.56	\$0.00
Total:	\$634.64	-\$634.64	\$0.00

DISCLAIMER: This proof of payment was created from the best available data from the collector's office as of 11/22/2024. The paid status of taxes is subject to change due to NSF checks, refunds, partial payment and other conditions. If you have any questions about the information contained herein please contact the collector's office.

Attachment 1

<u>276988</u>	Delinquent	2022	3/1/2024	\$0.00	\$0.00	\$634.64	\$634.64
<u>272729</u>	Delinquent	2021	2/28/2023	\$0.00	\$0.00	\$645.20	\$645.20
<u>269205</u>	Delinquent	2020	3/15/2022	\$0.00	\$0.00	\$601.15	\$601.15
<u>17073</u>	Current	2019	10/19/2020	\$0.00	\$0.00	\$350.90	\$350.90
<u>261140</u>	Delinquent	2018	3/3/2020	\$0.00	\$0.00	\$427.71	\$427.71
<u>256937</u>	Delinquent	2017	3/5/2019	\$0.00	\$0.00	\$634.33	\$634.33
<u>250896</u>	Delinquent	2016	11/20/2017	\$0.00	\$346.15	\$0.00	\$346.15
<u>15979</u>	Current	2015	10/19/2016	\$0.00	\$356.21	\$0.00	\$356.21
<u>17736</u>	Current	2014	10/19/2015	\$0.00	\$227.13	\$0.00	\$227.13
<u>17876</u>	Current	2013	10/16/2014	\$0.00	\$93.95	\$0.00	\$93.95
<u>17896</u>	Current	2012	10/16/2013	\$0.00	\$66.59	\$0.00	\$66.59
<u>230236</u>	Delinquent	2011	11/21/2012	\$0.00	\$0.00	\$122.38	\$122.38
<u>12448</u>	Current	2010	9/19/2011	\$0.00	\$0.00	\$131.13	\$131.13
<u>18106</u>	Current	2009	10/13/2010	\$0.00	\$130.21	\$0.00	\$130.21
<u>16433</u>	Current	2008	10/7/2009	\$0.00	\$168.63	\$0.00	\$168.63
<u>15256</u>	Current	2007	10/5/2008	\$0.00	\$115.25	\$0.00	\$115.25

← WillandMelissa Rogers

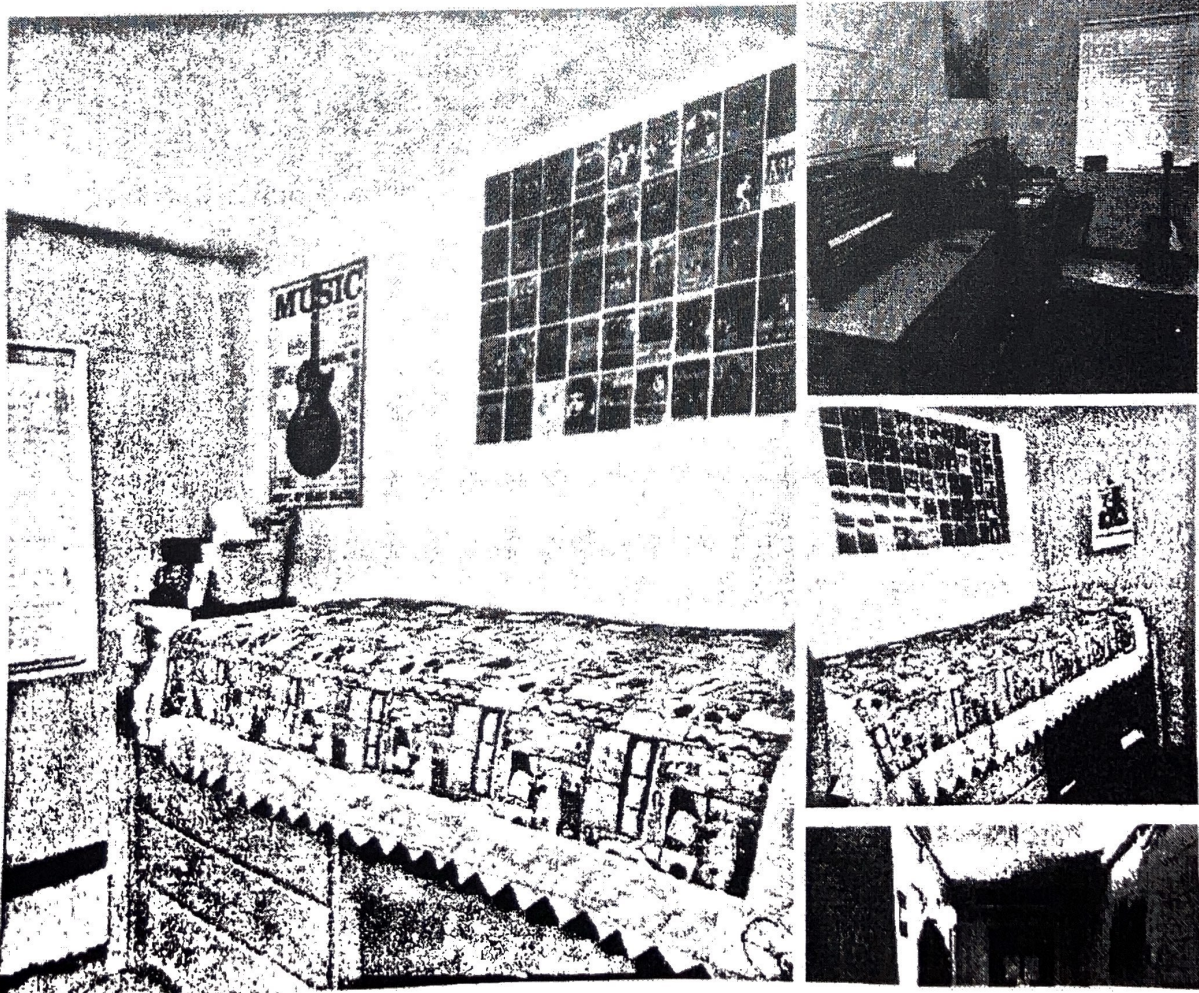


WillandMelissa Rogers



Aug 17 · 🌐

The quilt mema and papa made for him, the pillow mema bought him, uncle Ronnie's guitar and mema's old, worn out sewing chair. I'd say he has the best watching over him as he begins this new journey!





Replies

**Barbara Gann**

Well, Blake has certainly started a new adventure and it looks like he is taking the rest of us with him, our adventure is just a bit different. Danny has been worried about missing him and has voiced his concerns and I know that I feel the same way, but you know how it is when you are supposed to be strong and keep the kids knowing that all is well and everything is going to be fine, so you don't always say ME TOO. Anyway, while Wirth is certainly going to



Write a reply...





Replies



while Wirth is certainly going to be different without Blake pattering around on the side by side and planning the goat adventure, I am positive that he will do great with college (and I really do feel that way, not just saying it to be strong) and I am excited for him. I promised Danny that Blake would be home every weekend, so he will hardly even know that Blake is gone because school and football are going to keep Danny so busy. We started to leave today and Danny asked where's Blake. I said he is staying here. He replied with "You told me he would be home every weekend". Well, I did. So



Write a reply





Replies



will do great with college (and I really do feel that way, not just saying it to be strong) and I am excited for him. I promised Danny that Blake would be home every weekend, so he will hardly even know that Blake is gone because school and football are going to keep Danny so busy. We started to leave today and Danny asked where's Blake. I said he is staying here. He replied with "You told me he would be home every weekend". Well, I did. So there's that. We love our Blake and are so glad God gave him to us.

3 mos

Like

Reply



7



Write a reply





JOHN THURSTON
ARKANSAS SECRETARY OF STATE

October 10, 2024

Sent via First Class Mail

DAVE CAMPBELL
440 MAIN STREET
MOMMOTH SPRING, AR 72554

Re: Complaint received –Barbara Gann, Ark. Notary Public

Dear Mr. Campbell:

Thank you for your letter regarding Barbara Gann, an Arkansas Notary Public. A reprimand has been issued to the Notary.

Generally, this Office does not have authority to revoke a Notary Commission, or take any other disciplinary action, absent a court order. If you wish to bring formal action against the notary public and/or declare the documents void, please contact a private attorney and pursue this matter in the judicial system. Unfortunately, we are unable to provide any legal assistance.

If and when the notary public is found by a court to have improperly notarized documents according to the law – either criminally or civilly – then this office would have grounds to revoke a commission or take other applicable action in accordance with a court order. A copy of the Arkansas Notary Handbook and Arkansas Notary Law may be found on our website (www.sos.arkansas.gov) for your review.

If you believe criminal conduct occurred, such a forgery or fraud, we encourage you to contact your local prosecuting attorney. If you cannot afford representation, you may reach out to Arkansas Center for Legal Services.

Your complaint will remain on file with this Office under the file of Barbara Gann. Please let us know if any new information concerning this matter becomes available. If you have any further questions, please do not hesitate to contact us at (501) 682-3401.

Sincerely,

A handwritten signature in cursive script that reads "Kelley Cobb".

Kelley Cobb
Legal Division



ATTN: LEGAL DIVISION
JOHN T HURSTON, SECRETARY OF STATE
STATE CAPITOL, SUITE 256
500 WOODLANE STREET
Little Rock, Arkansas 72201-1094

DAVE CAMPBELL
440 MAIN STREET
MOMMOTH SPRING, AR 72554

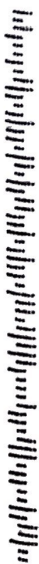
LITTLE ROCK AR 720
11 OCT 2024 PM 4 L

FIRST-CLASS



US POSTAGE
ZIP 72201 \$000.69⁰⁰
02 7M
0098023222 OCT 11 2024

72554-880040





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

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

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.

/

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 Campbell
Dawn Campbell

Dave and Dawn Campbell

COPY RECEIVED @ CITY HALL

Mayer read on video (MoArkNews.com)
and refused to sign, "Copy received."

DANNY BUSCH
MAYOR

JUNE GRANT
RECORDER / TREASURER

DEWAYNE PLUMLEE
CITY ATTORNEY

City of Mammoth Spring

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, therefor no documentation exists.

Respectfully,



Mayor Danny Busch

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,

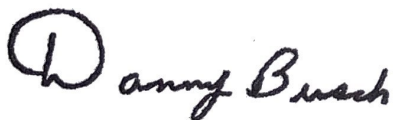
Please find the following in response to your Freedom of Information Act request dated 06/17/2024 and received via mail on 06/18/2024 packaged in an eBay envelope with no return address.

- 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

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



Attachment 9

When did these two cousins grow up!! WillandMelissa Rogers
WilliamandBarbara Gann



44

1 comment

Like

Comment

Share



WillandMelissa Rogers

October 12, 2021 · 🌐



As many of you know, I am running for the Mammoth Spring School Board, position 4. I wanted to take a minute and discuss my reasons for making this decision. I view Mammoth Spring School District as an important part of our past, present, and future. Regardless of whether or not you currently have a student in school at Mammoth Spring, you still have ties to the district. Last night, at the annual Blue and White game, I noted the enormous support our students have through our community. It was amazing coming into a gym full of parents, grandparents, aunts, uncles and friends who were all there to share one thing; their love and support for our school and our students. For me, running for school board is about involving parents, teachers, staff and community members in the development of our children.



Superintendent completing yearly budgets, working with Child Nutrition, and staying on top of changing legislation regarding public education. I opted to leave Williford when legislation went into effect that eventually closed the district; an act that I want to be a part of preventing when it comes to the Mammoth Spring School.

The last seven years of my time in public education were spent in the principal's office allowing me to interact frequently with the students at Couch Elementary. It was interesting to listen to the students and hear the needs they had. It was wonderful interacting with the parents and seeing everyone come together to determine the best possible course for the kids.

Currently, I work for the City of Mammoth Spring completing daily financial tasks and monitoring budgets. This position has allowed me to see the interest our community has in our school. It has also offered me the opportunity to be part of grant writing. My favorite project so far has been the new park we were able to build with grant funding. I am blessed to be allowed to be part of our wonderful community, and having three Mammoth Spring bears of my own, I have been able to see the wonderful opportunities available to our students that could lead them down a successful path.

My work history has also made me highly accountable for my bookkeeping procedures and understanding the need to stay on top of state legislation and guidelines. During my time, I have been through ten state legislative audits, four federal audits and fourteen private audits; all completed with no reportable findings.

I bring knowledge of current legislation and state guidelines as well as an understanding of budgets, proper reporting procedures, and the need for a strong educational foundation. I am familiar with state programs such as vocational courses, child nutrition and state curriculum. I believe I can be an asset in obtaining the components required to build a strong educational foundation for our children all while giving them pride in being a Mammoth Spring bear. More than anything, I understand the need to involve parents, grandparents, aunts, uncles and all forms of positive influences in supporting our children.

The school has opted for one polling place which will be located at the old Mammoth Spring Parts Store on Highway 9 across the road from the post office. Polls will be open from 7:30 am to 7:30 p.m. on Tuesday, November 2nd. I know this is a long trip for our Randolph county residents and many of the Sharp County residents. However, if you are able to make it to the polls, I would appreciate your vote!

If elected, I look forward to serving our school, our students, and our community. Our children are our future. Please vote Melissa Rogers, Mammoth Spring school board, position 4.

41

20 comments 10 shares

Like

Comment

Share



Barry O'Dell is with WillandMelissa Rogers and 5 others.

January 20, 2021

Our 6th graders from the ArkMo tournament

IN THE CIRCUIT COURT OF FULTON COUNTY, ARKANSAS
CIVIL DIVISION
16th JUDICIAL CIRCUIT

MELISSA ROGERS,

PLAINTIFF,

v.

Case No. 25CV-24-73

DAVE CAMPBELL AND

DAWN CAMPBELL,

DEFENDANTS.

VERIFICATION UNDER § 16-63-505

I, Melissa Rogers, Plaintiff, and I, John T. McGinnes, and Jody L. Shackelford, attorneys of record for the plaintiff, hereby verify under oath the following:

1. We have read the claim asserted in this case.
2. To the best of our knowledge, information, and belief formed after reasonable inquiry, the claim is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law.
3. The act forming the basis for the claim is not a privileged communication.
4. The claim is not asserted for any improper purpose, such as to suppress the right of free speech or the right to petition the government of a

person or entity, to harass, or to cause unnecessary delay or needless increase in the cost of litigation.

We certify the above statements under penalty of perjury this 7th of August, 2024.

Respectfully submitted,

Melissa Rogers, Plaintiff

Melissa Rogers

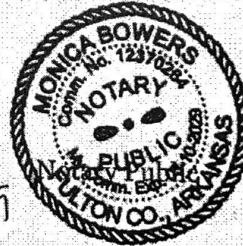
ACKNOWLEDGEMENT

STATE OF ARKANSAS)
COUNTY OF FULTON)

On this 7th day of August in the year 2024, before me, the undersigned notary public, personally appeared Melissa Rogers, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that they executed the same for the purposes therein contained.

In witness whereof I hereunto set my hand and official seal.

Monica Bowers



My Commission Expires: Mar 10, 2029

BY: *[Signature]*
John T. McGinnes, Esq.

Bar# 2024042
The Iron Rock Law Firm
131 Church St.
Salem, AR 72576
Phone: (870) 399-1440
Fax: (870) 466-7574
Email: john@goironrock.com

ACKNOWLEDGEMENT

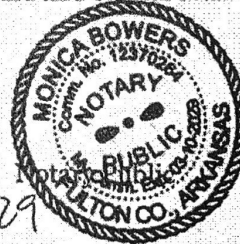
STATE OF ARKANSAS)

COUNTY OF FULTON)

On this 7th day of August in the year 2024, before me, the undersigned notary public, personally appeared John McGinnes, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that they executed the same for the purposes therein contained.

In witness whereof I hereunto set my hand and official seal.

Monica Bowers



My Commission Expires: Mar 10, 2029

BY: Jody Shackelford

Jody L. Shackelford, Esq.
Bar# 2019037
The Iron Rock Law Firm
131 Church St.
Salem, AR 72576
Phone: (870) 399-1440
Fax: (870) 466-7574
Email: jodyshackelford@me.com

ACKNOWLEDGEMENT

STATE OF ARKANSAS)
COUNTY OF FULTON)

On this 7th day of August in the year 2024, before me, the undersigned notary public, personally appeared Jody L. Shackelford, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that they executed the same for the purposes therein contained.

In witness whereof I hereunto set my hand and official seal.

Monica Bowers



My Commission Expires: Mar 10, 2029

CERTIFICATE OF SERVICE

I, John T. McGinnes, do hereby state that I have on this 7th day of August, 2024, served a true and correct copy of the above and foregoing electronically:

Dave and Dawn Campbell

campbell@ilovejesus.com

440 Main St

Mammoth Spring, AR 72554

BY: John T. McGinnes
John T. McGinnes, Esq.

ARBar#2024042

IN THE CIRCUIT COURT OF FULTON COUNTY, ARKANSAS
CIVIL DIVISION
16th JUDICIAL CIRCUIT

MELISSA ROGERS, PLAINTIFF,

v. Case No. 25CV-24-73

DAVE CAMPBELL AND
CATRENIA DAWN CAMPBELL, DEFENDANTS.

**AMENDED COMPLAINT AT LAW
FOR DEFAMATION AND INJUNCTIVE RELIEF**

Comes now, Plaintiff, Melissa Rogers, by and through her attorney, John T. McGinnes, and Jody Shackelford of the Iron Rock Law Firm, and for her Complaint at Law for Defamation and Injunctive relief, states:

1. This Court has jurisdiction and venue is proper.
2. Parties are all residents of the State of Arkansas and have been for all relevant times in connection with this matter.

BACKGROUND FACTS

3. Melissa Rogers ("Plaintiff") is a non-elected employee with the City of Mammoth Spring and has held her employment since 2014.
4. David Campbell and Dawn Campbell ("Defendants") are a married couple who own property along Main Street in Mammoth Spring, Arkansas.
5. Defendants have erected a sign on their property that allows for messages to be displayed.

6. On June 18, 2024, Plaintiff was informed by a co-worker that a defamatory message concerning her had been displayed on Defendants' sign.

7. The sign read: "City Hall let Jamie pimp on my wife in 4/1 open meeting. What's he 'Done' with Melissa?!"

8. The defamatory message caused Plaintiff and her family significant distress and emotional harm. Plaintiff has been married for 25 years and has three children and two grandchildren.

9. The message prompted numerous texts and phone calls to Plaintiff and her family, resulting in substantial disruption to their personal lives.

10. Plaintiff and her husband went to town to discuss how to handle the situation after calming their family.

11. The defamatory message has caused ongoing problems for Plaintiff, including concerns for her family's safety and difficulty performing her job duties.

12. Plaintiff's 18-year-old son, who is set to begin college and works as a temporary summer employee for the city, has been negatively impacted by the defamatory message because people have been taking photos and videos of him while he was performing duties as a result of the defamation. He is concerned about his reputation and future employment opportunities with the city.

13. The defamatory message has significantly disrupted Plaintiff's ability to complete her job duties at City Hall, where she serves as the Deputy Recorder/Treasurer and assistant to the mayor.

14. Plaintiff has had to work extra hours, including weekends, to manage the influx of people demanding explanations for the sign, which has impeded her ability to perform her regular duties.

17. Plaintiff and her husband also work part-time for Driveline, and the defamatory message has interfered with their ability to complete tasks in local stores due to ongoing community gossip.

18. Plaintiff is no longer able to complete personal tasks in her town without being approached about the sign, affecting her ability to shop, dine, and participate in activities without being questioned about the defamatory message.

19. The constant questioning and public scrutiny have created an atmosphere of uncertainty and anxiety for Plaintiff and her family, who feel they must explain the situation repeatedly.

20. Plaintiff is considering requesting unpaid FMLA leave or a work-from-home arrangement due to the emotional and mental strain caused by Defendants' actions.

21. Plaintiff has lived in the community for nearly 45 years and wishes to continue being viewed as a productive and welcomed community member, free from the defamatory accusations made by Defendants.

DEFAMATION

22. Plaintiff claims damages from Defendant for defamation.

23. Plaintiff sustained damages;

24. Defendants did publish a false statement, incorporated here by reference as if stated word for word, of fact concerning Plaintiff;

25. That the statement of fact was defamatory;

26. That Defendants acted with negligence in failing to determine the truth of the statement prior to its publication or with knowledge the statement was false;

27. That the publication of the statement was a proximate cause of Plaintiff's damages.

PRELIMINARY INJUNCTION

28. Plaintiff respectfully moves this Court for a preliminary injunction to prevent Defendants, David Campbell and Dawn Campbell, from displaying or permitting the display of defamatory messages on their property located on Main Street, Mammoth Spring, Arkansas, particularly the message which states "City Hall let Jamie pimp on my wife in 4/1 open meeting. What's he 'Done' with Melissa?!", or any similar defamatory statements about Plaintiff.

29. Plaintiff has shown a likelihood of success on the merits of her defamation claim as the Defendants have published false and defamatory statements about her, which have caused her substantial damage and distress.

30. Plaintiff will suffer immediate and irreparable injury, loss, or damage if the injunction is not granted. The continued display of the defamatory sign will cause further harm to Plaintiff's reputation and emotional well-being that cannot be adequately compensated by monetary damages alone.

31. The balance of equities tips in favor of Plaintiff. The harm to Plaintiff from the continued defamation far outweighs any inconvenience Defendants might experience from refraining from displaying defamatory messages.

32. An injunction would serve the public interest by upholding the integrity and respectability of individuals against unwarranted and defamatory attacks.

33. Pursuant to Ark. R. Civ. P. 65(a)(1), Plaintiff has provided notice to Defendants of this motion for a preliminary injunction.

34. Plaintiff agrees to post security as required by the Court pursuant to Ark. R. Civ. P. 65(c) to pay the costs and damages sustained by any party found to have been wrongfully enjoined or restrained.

35. Verification under Arkansas Code 16-63-505, attached, and is incorporated here by reference as if stated word for word.

Wherefore, Plaintiff respectfully requests that this Court:”

(a) Issue a preliminary injunction ordering Defendants to immediately cease the display of any defamatory messages about Plaintiff, including but not limited to the message referenced above and to prevent further defamatory statements from being displayed pending the outcome of this lawsuit;

(b) Award Plaintiff the relief sought in her Complaint at Law for Defamation, including damages and any further relief the Court deems just and proper;

(c) Grant such other and further relief as may be necessary to fully protect the interests of Plaintiff.

Respectfully submitted,

Melissa Rogers, Plaintiff

/s/ John T. McGinnes, Esq.

Bar# 2024042

The Iron Rock Law Firm

131 Church St.

34. Plaintiff agrees to post security as required by the Court pursuant to Ark. R. Civ. P. 65(c) to pay the costs and damages sustained by any party found to have been wrongfully enjoined or restrained.

35. Verification under Arkansas Code 16-63-505, attached, and is incorporated here by reference as if stated word for word.

Wherefore, Plaintiff respectfully requests that this Court:"

(a) Issue a preliminary injunction ordering Defendants to immediately cease the display of any defamatory messages about Plaintiff, including but not limited to the message referenced above and to prevent further defamatory statements from being displayed pending the outcome of this lawsuit;

(b) Award Plaintiff the relief sought in her Complaint at Law for Defamation, including damages and any further relief the Court deems just and proper;

(c) Grant such other and further relief as may be necessary to fully protect the interests of Plaintiff.

Respectfully submitted,

Melissa Rogers, Plaintiff

/s/ John T. McGinnes, Esq.

Bar# 2024042

The Iron Rock Law Firm

131 Church St.

Salem, AR 72576

Phone: (870) 399-1440

Fax: (870) 466-7574

Email: john@goironrock.com

CERTIFICATE OF SERVICE

I, John T. McGinnes, do hereby state that I set in motion service via process server of a true and correct copy of the foregoing on this 7th day of August, 2024, such to deliver this Complaint to the Defendants to:

Dave and Dawn Campbell

440 Main St

Mammoth Spring, AR 72554

/s/ John T. McGinnes, Esq.

ARBar#2024042

P. 4 of Melissa Rogers' Original Complaint In Case No. 25CV-24-73 - Filed 07/16/24

DEFAMATION

22. Plaintiff claims damages from Defendant for defamation.
23. Plaintiff sustained damages;
24. Defendants did publish a false statement, incorporated here by reference as if stated word for word, of fact concerning Plaintiff;
25. That the statement of fact was defamatory;
26. That Defendants acted with negligence in failing to determine the truth of the statement prior to its publication or with knowledge the statement was false;
27. That the publication of the statement was a proximate cause of Plaintiff's damages.

PRELIMINARY INJUNCTION

28. Plaintiff respectfully moves this Court for a preliminary injunction to prevent Defendants, David Campbell and Dawn Campbell, from displaying or permitting the display of defamatory messages on their property located on Main Street, Mammoth Spring, Arkansas, particularly the message which states "Jamie and Melissa get it on," or any similar defamatory statements about Plaintiff.

29. Plaintiff has shown a likelihood of success on the merits of her defamation claim as the Defendants have published false and defamatory statements about her, which have caused her substantial damage and distress.