

Extortion, Breach of Contract, Fraud, Federal Easement Rights,
Intentional Infliction of Emotional Distress, False
Light/Invasion of Privacy, Defamation and Private Nuisance
against National Development Company, Inc.

**STATEMENT OF DEFENDANT DEBORAH A. CLUTTER'S IDENTITY
AND LOCATION:**

5(a) Defendant, Deborah A. Clutter, is a citizen of Missouri, whose address is 2 Woodland Lakes, Sullivan, Missouri. Ms. Clutter has been the "Registered Agent" for "WLT" from inception, to include 1986-1999 and 2011 to the present. Deborah Clutter is, once again, the "Registered Agent," "WLT", as of, in or around, July of 2011.

REMEDY SOUGHT FROM AND CLAIMS AGAINST DEBORAH A. CLUTTER:

(b) In this case, Deborah A. Clutter is being sued for information, and also for damages from her part in this lawsuit, totaling \$177,853.30 (one hundred seventy-seven thousand, eight hundred fifty-three dollars and thirty cents). Plaintiffs allege Counts I through XIII; Violation of Civil Rights, Conversion, Injunctive Relief, Ejectment, Tortious Interference, Extortion Breach of Contract, Fraud, Federal Easement Rights, Intentional Infliction of Emotional Distress, False Light/Invasion of Privacy, Defamation and Private Nuisance

against Ms. Clutter, who is hereby being sued in her personal and professional capacities. Ms. Clutter did maliciously act outside her authority against Plaintiffs.

**STATEMENT OF DEFENDANT FRANCIS OSCAR DARIAN, JR.'s
IDENTITY AND LOCATION:**

- 6(a) Defendant Francis Oscar Darian, Jr. is a citizen of Missouri, whose address is 14 Woodland Lakes, Sullivan, Missouri, 63080. Francis Oscar Darian, Jr., presently is the treasurer for "WLT" and has been a "Trustee" for "WLT" since 2006, with the exception of the year 2008, when Francis Darian was sued by "WLT." Francis Darian does currently operate two non-state registered businesses inside the Woodland Lakes Development, advertised as, "*Daran Hauling*" [not a type-o] and "*Darian Construction*." (Plaintiffs' Exhibit 2 – Advertisement)

REMEDY SOUGHT FROM AND CLAIM AGAINST FRANCIS OSCAR DARIAN, JR.:

- (b) In this case, Francis Oscar Darian, Jr. is being sued for damages from his part in this lawsuit, totaling \$177,853.30 (one hundred seventy-seven thousand, eight hundred fifty-three dollars and thirty cents). Plaintiffs allege Counts I through XIII; Violation of Civil Rights, Conversion, Injunctive Relief, Ejectment, Tortious Interference, Extortion, Breach of Contract, Fraud, Federal Easement Rights, Intentional Infliction of Emotional Distress,

False Light/Invasion of Privacy, Defamation and Private Nuisance against Mr. Darian, who is hereby being sued in his personal and professional capacities. Mr. Darian did maliciously act outside his authority against Plaintiffs.

STATEMENT OF DEFENDANT LAWRENCE DEIS' IDENTITY AND LOCATION:

- 7(a) Defendant, Lawrence Deis, is a citizen of Missouri, whose address is 43 Woodland Lakes. Lawrence Deis is presently the president for "WLT" and has been a "Trustee" for "WLT" since 2006, with the exception of the year 2008, when Lawrence Deis was sued by "WLT."

REMEDY SOUGHT FROM AND CLAIMS AGAINST LAWRENCE DEIS:

- (b) Lawrence Deis is being sued for damages from his part in this lawsuit, totaling \$88,926.65 (eighty-eight thousand, nine hundred twenty-six dollars and sixty-five cents). Mr. Deis, who is hereby being sued in his personal and professional capacities. Plaintiffs allege Counts I through XIII; Violation of Civil Rights, Conversion, Injunctive Relief, Ejectment, Tortious Interference, Extortion, Breach of Contract, Fraud, Federal Easement Rights, Intentional Infliction of Emotional Distress, False Light/Invasion of Privacy, Defamation and Private Nuisance against Mr. Deis, who did maliciously act outside his authority

against Plaintiffs.

**STATEMENT OF DEFENDANT RUSSELL RICHARDS' IDENTITY
AND LOCATION:**

8(a) Defendant, Russell Richards, is a citizen of Missouri, whose address is 10080 Asta, Cadet, Missouri, 63630. Russell Richards is currently the VP for "WLT" and was a "Trustee" for "WLT" the same year Russell Richards was sued by "WLT" in 2008. Russell Richards owns and operates two non-state-registered businesses, advertised as, "USA Home Improvements" and "USA Camp and Home Improvements," doing business within the Woodland Lakes Development. (Plaintiffs' Exhibit 3 - Advertisement)

REMEDY SOUGHT FROM AND CLAIMS AGAINST RUSSELL RICHARDS:

(b) Russell Richards is being sued for damages from his part in this lawsuit, totaling \$88,926.65 (eighty-eight thousand, nine hundred twenty-six dollars and sixty-five cents). Mr. Richards, is hereby being sued in his personal and professional capacities. Plaintiffs allege Counts I through XIII; Violation of Civil Rights, Conversion, Injunctive Relief, Ejectment, Tortious Interference, Extortion, Breach of Contract, Fraud, Federal Easement Rights, Intentional Infliction of Emotional Distress, False Light/Invasion of Privacy, Defamation and Private Nuisance

against Mr. Richards, who did maliciously act outside his authority against Plaintiffs.

STATEMENT OF DEFENDANT CRAIG KINMANN'S IDENTITY AND LOCATION:

9(a) Defendant, Craig Kinmann, is a citizen of Missouri, whose address is 116 Woodland Lakes, Sullivan, Missouri, 63080. Craig Kinmann is listed as being on the Board of Directors for "WLT" and has been a "Trustee" for "WLT" since 2011.

REMEDY SOUGHT FROM AND CLAIMS AGAINST CRAIG KINMANN:

(b) In this case, Craig Kinmann is being sued for damages from his part in this lawsuit, totaling \$177,853.30 (one hundred seventy-seven thousand, eight hundred fifty-three dollars and thirty cents). Plaintiffs allege Counts I through XIII; Violation of Civil Rights, Conversion, Injunctive Relief, Ejectment, Tortious Interference, Extortion, Breach of Contract, Fraud, Federal Easement Rights, Intentional Infliction of Emotional Distress, False Light/Invasion of Privacy, Defamation and Private Nuisance against Mr. Kinmann, who is hereby being sued in his personal and professional capacities. Mr. Kinmann did maliciously act outside his authority against Plaintiffs.

STATEMENT OF DEFENDANT ARTHUR HURLBURT'S IDENTITY AND LOCATION:

10(a) Defendant, Arthur Hurlburt is a citizen of Missouri, whose

address is 115 Woodland Lakes, Sullivan, Missouri, 63080.

Arthur Hurlburt is listed as being on the Board of Directors for "WLT," and has been a "Trustee" for "WLT" since 2011.

REMEDY SOUGHT FROM ARTHUR HURLBURT WITH REASON:

- (b) Arthur Hurlburt is being sued for damages from his part in this lawsuit, totaling \$88,926.65 (eighty-eight thousand, nine hundred twenty-six dollars and sixty-five). Mr. Hurlburt is hereby sued in his personal and professional capacities. Plaintiffs allege Counts I through XIII; Violation of Civil Rights, Conversion, Injunctive Relief, Ejectment, Tortious Interference, Extortion, Breach of Contract, Fraud, Federal Easement Rights, Intentional Infliction of Emotional Distress, False Light/Invasion of Privacy, Defamation and Private Nuisance against Mr. Hurlburt, who did maliciously act outside his authority against Plaintiffs.

**STATEMENT OF DEFENDANT THOMAS LEON COLYOTT'S
IDENTITY AND LOCATION:**

- 11(a) Defendant, Thomas Leon Colyott, is a citizen of Missouri, whose address is 10756 Hamilton Hollow Road, Sullivan, Missouri, 63080. Thomas Leon Colyott was relieved of his duties as a State Park Ranger after approximately 11 years of service. Thomas Leon Colyott is commissioned by the Washington County Sheriff's Department in Potosi, Missouri and is paid well

by WLT" to enforce trespassing and peace disturbance laws.

REMEDY SOUGHT FROM AND CLAIMS AGAINST THOMAS LEON COLYOTT:

(b) In this case, Thomas Leon Colyott is being sued for damages totaling \$177,853.30 (one hundred seventy-seven thousand, eight hundred fifty-three dollars and thirty cents). Plaintiffs allege Counts I through XIII; Violation of Civil Rights, Conversion, Injunctive Relief, Ejectment, Tortious Interference, Extortion, Breach of Contract, Fraud, Federal Easement Rights, Intentional Infliction of Emotional Distress, False Light/Invasion of Privacy, Defamation and Private Nuisance against Mr. Colyott, who is hereby being sued in his personal and professional capacities. Mr. Colyott did maliciously act outside his authority against Plaintiffs.

STATEMENT OF DEFENDANT LINDA WADE'S IDENTITY AND LOCATION:

12(a) Linda Wade is a citizen of Missouri, whose address is 600 Blow Street, De Soto, Missouri, 63020, who was briefly a trustee for "WLT" in '08 and was also later sued by "WLT" in 08.

REMEDY SOUGHT FROM AND CLAIMS AGAINST LINDA WADE:

(b) Linda Wade is being sued for damages from her part in this lawsuit, totaling \$88,926.65 (eighty-eight thousand, nine hundred twenty-six dollars and sixty-five cents). Plaintiffs allege Counts X-XIII; Intentional Infliction of Emotional Distress,

False Light/Invasion of Privacy and Defamation against Ms.

Wade, who is being sued in her personal capacity.

**STATEMENT OF DEFENDANT CRYSTAL KALLANSRUD'S,
IDENTITY AND LOCATION:**

13(a) Crystal Kallansrud is a resident of Fletcher, Missouri, who claims on her Facebook page to be "WLT" officer manager, and does work in the Woodland Lakes office.

REMEDY SOUGHT FROM CRYSTAL KALLANSRUD:

(c) In this case, Crystal Kallansrud is being sued in counts I-XIII in her official capacity, as an employee for Woodland Lakes Trusteeship, Inc., whose damages are \$800,339.85 (eight hundred thousand, three hundred thirty-nine dollars and eighty-five cents), so therefore meets diversity jurisdiction requirements.

**STATEMENT OF DEFENDANT PATRICIA EDGAR'S IDENTITY AND
LOCATION:**

14(a) Patricia Edgar is a citizen of Missouri whose address is 22 Woodland Lakes, Sullivan, Missouri, 63080. Ms. Edgar is an employee for "WLT" as gate security and maintenance, as needed.

**REMEDY SOUGHT FROM AND CLAIMS AGAINST PATRICIA
EDGAR:**

(b) In this case, Patricia Edgar is being sued for damages from her

part in this lawsuit, totaling \$88,926.65 (eighty-eight thousand, nine hundred twenty-six dollars and sixty-five cents). Plaintiffs allege Counts X-XIII; Intentional Infliction of Emotional Distress, False Light/Invasion of Privacy, Defamation and Public Nuisance against Ms. Edgar, who is being sued in her personal capacity in Actions X, XII, and in her professional capacity in Actions I-XIII.

STATEMENT OF DEFENDANT SIMONE HATTON'S IDENTITY AND LOCATION:

15(a) Simone Hatton is an employee for "WLT," and operates as gate security.

REMEDY SOUGHT FROM SIMONE HATTON:

(b) In this case, Simone Hatton is being sued in Actions I-XIII in her official capacity as an employee for Woodland Lakes, Trusteeship, Inc, whose damages total \$800,339.85 (eight hundred thousand, three hundred thirty-nine dollars and eighty-five cents), so therefore meets diversity jurisdiction requirements.

STATEMENT OF DEFENDANT CLYDE W. ENGLE'S IDENTITY AND LOCATION:

16(a) Defendant, Clyde W. Engle, a resident of Illinois and Hawaii, is owner of National Development Company, Inc., and whose Registered Agent is Prentice Hall Corp. System, 221 Bolivar,

Jefferson City, Missouri, 65101. Mr. Engle is the alter ego of National Development Company, Inc., who now owes approximately \$53,000,000.00 (fifty-three million dollars) to Tennessee property owners due to a failure on the part of National Development Company, Inc.

REMEDY SOUGHT FROM CLYDE W. ENGLE:

- (b) Clyde W. Engle is being sued for damages in Actions I-XIII, totaling \$88,926.65 (eighty-eight thousand, nine hundred twenty-six dollars and sixty-five cents). Mr. Engle, who is hereby being sued in his personal and professional capacities. Plaintiffs allege Counts I through XIII; Violation of Civil Rights, Conversion, Injunctive Relief, Ejectment, Tortious Interference, Extortion, Breach of Contract, Fraud, Federal Easement Rights, Intentional Infliction of Emotional Distress, False Light/Invasion of Privacy, Defamation and Private Nuisance against Mr. Engle.

STATEMENT OF DEFENDANT LARRY ANDERSON'S IDENTITY AND LOCATION:

- 17(a) Defendant, Larry Anderson, is a citizen of Missouri, who owns and operates A-Z New and Used Computers, located at 112-114 W. Euclid Street, Sullivan, Missouri, 63080. Mr. Anderson is the administrator for a Woodland Lakes area on-line discussion forum, known as "Welcome to Woodland," also known as Larry's