

few weeks I have had time to think about how trying to gain someone's compliance with the law by arguing it with the moron and his followers is a waste of time. When dealing with people like this, it is better to simply enforce it and let the chips fall where they may. The End" [sic] (Plaintiffs' Exhibit 15)

51. On December 06, 2011, Officer Thomas Colyott did make this statement on his Facebook: *"It's amazing how the same idiots think they are lawyers. They have to learn the hard way. Big surprise coming! lol" [sic]*
52. In response to Officer Colyott's Facebook status made December 6th, 2011, Washington County Sheriff-commissioned officer, Tony Maxwell, did ask Officer Colyott, *"Are you still fighting with that mess up there? I went up there in 2007 into that cluster" [sic]*
53. Officer Colyott made the following comments to his December 6th, 2011 Facebook status: *"Got worse. Some idiot thinks he's a lawyer and has a small gathering of people with no clue. Some are criminals facing charges or have been prosecuted in the past. He was denied vehicle ingress since they were trying to live on a camping lot with no well or septic. Indenture forbids it. So now they are bashing deputies, the county, the board, employees or anybody who speaks up to them on those stupid*

rumor mill websites. Ticket sales!"

54. The following comment was deleted sometime after Deputy Colyott left it: *"Some actually think they own the office, gate, roads, community center, pool, lakes, etc. All they own is their lot. The deeds at the courthouse state who the true owner is.*

Cant [sic] fix stupid!" **(Plaintiffs Exhibit 10)**

55. Defendants did use violence, threats and intimidation while throwing the Plaintiffs off their land, and while threatening and attempting to have Plaintiffs arrested for trespass. On his Facebook, Officer Colyott did state, *"If your name is not on the deed, you're not the propertyowner and are subject to being charged with peace disturbance."*

(Plaintiffs Exhibit 14)

56. A Washington County, Missouri, Sheriff-commissioned officer, Tony Maxwell, did state on Deputy Colyott's Facebook, *"If you need some extra 'hands on help' just give us a call ... I may not have a cure for it, but we can help provide a treatment plan."*

(Plaintiffs' Exhibit 16)

57. Plaintiffs did ask for all records the Trust Indenture indicates are available to property owners, via Certified Mail and via a face-to-face request to Deborah Clutter in the office.

"WLT" has failed to provide Plaintiffs with any of the

requested documents.

58. During a December 10, 2011 "WLT" open meeting, Officer Colyott did inform those in the room, Trustees, "WLT" Attorney Dave Baylard and property owners present, that property owners could be arrested for trespass while in the Woodland Lakes subdivision for as simple a fact as a trustee does not like them, further indicating the Prosecuting Attorney and Judge support such action. (Plaintiffs' Exhibit 12)
59. Plaintiffs were denied notices and all remedies of due process during the transactions that deprived Plaintiffs of their property, thereby being denied a realistic opportunity to present their objections.
60. On 11/11/11, "WLT" did direct Plaintiffs, via an unsigned notice at the gate, without reason, to remove Plaintiffs' belongings from the development of Woodland Lakes by 4 p.m. 11/12/11. Because Plaintiffs had less than 24 hours to comply, Plaintiffs were forced to leave a large amount of their belongings on their property. A landing gear on Plaintiffs' fifth wheel broke, and with high winds, Plaintiffs camper did fall on Plaintiffs' truck, consuming much time. "WLT" has forced Plaintiffs, with malice, to abandon their belongings in the development of Woodland Lakes, unprotected and vulnerable to strangers and other elements.

61. Through the angst of abruptly shuffling one's life around, Plaintiff Dave Campbell did suffer injury to his knee that was so painful Plaintiff could not apply muscle or weight-bearing movements, so did go to the emergency room on November 14, 2011, where Plaintiff was placed on crutches.
62. On January 08, 2012, Plaintiffs did reasonably attempt to receive IP addresses from Defendant Larry Anderson, who administers the Welcome to Woodland forum. **(Plaintiffs' Exhibit 25)**
63. On January 10, 2012, Mr. Anderson emailed a response letter to Dave Campbell, and also blogged it on the Woodland forum, in spiteful noncompliance and stating, *"Get your lawyer busy...I'll be waiting to hear from the judge!"* **(Plaintiffs' Exhibit 26)**
64. On October 02, 2011, Trustee Cheryl Davis, while in the presence of Plaintiffs' customers, did stop Plaintiffs in traffic while passing by Plaintiffs' customers' property in their vehicle.
65. In the presence of Plaintiffs' customers, Trustee Cheryl Davis did loudly admonish Plaintiffs for allegedly having, earlier in the day, spilled sewage from a camper the Plaintiffs had moved for the "tax man." Plaintiffs were told by Ms. Davis they would have to clean the street, alleging that many people had

called the Woodland Lakes office to complain against Plaintiffs.

66. Plaintiffs did visit Trustee Cheryl Davis at her property in Woodland Lakes, that same evening, to provide notification that if the trusteeship had any problems with Plaintiffs in the future, they should discuss such matter with Plaintiffs in privacy because Ms. Davis had discussed embarrassing business, allegedly about Plaintiffs, while in the presence of Plaintiffs' customers.
67. While conversing with Trustee Cheryl Davis, Plaintiffs did learn from Ms. Davis the person she believed to have spilled sewage had done so when turning out of the Emerald Lake Dump Station, alleging that sewage was on the road in front of the Emerald Lake Dump Station.
68. On October 2nd, 2011, Plaintiffs moved a fifth wheel camper from property A to property B inside the development of Woodland Lakes, and Plaintiffs did not enter or exit any bathhouses or dump stations in the development while doing so.
69. In Defendants locking Plaintiffs out on October 28, 2011 at 9:45 p.m., Defendants: 1) harmed Plaintiffs' reputation to fellow property owners; 2) took away Plaintiffs' freedom to enjoy the ending of Game Seven of the World Series; 3) have inflicted fear, pain and suffering upon Plaintiffs; 4) Defendants did cause

an invasion of defamatory comments on Internet forums; 5) strong-armed Plaintiffs into paying anothers' debts of well over \$1,000.00; 6) did humiliate Plaintiffs by mocking Plaintiffs, refusing to communicate with Plaintiffs, and denying Plaintiffs due process; 7) did threaten to arrest Plaintiffs if Plaintiffs did not leave the development of Woodland Lakes; 8) locked Plaintiffs out from their full-time living quarters without warning for fabricated charges, only to harass Plaintiffs, with prejudice; 9) took away Plaintiffs' right and freedom to enjoy Plaintiffs' property and amenities thereof.

70. In Defendants locking Plaintiffs out on November 11, 2011, Defendants: 1) further harmed Plaintiffs' personal and professional reputations; 2) ruin Plaintiffs' Veterans' Day celebration; 3) did harm Plaintiffs further by placing Plaintiffs in fear of their safety and well-being, which did cause Plaintiffs to reach out to others in search of answers; 4) did further humiliate Plaintiffs on the morning of November 12, 2011 as Plaintiffs approached the office in search of answers, Defendant Deborah Clutter and Defendant Chrystal Kallansrud did file a false sheriff's report against Plaintiffs in an attempt to have Plaintiffs arrested.

71. With less than 18-hour's notice to remove all Plaintiffs' personal

property and vacate Woodland Lakes, Plaintiffs were forced to leave behind many personal items, while thousands of dollars and hundreds of hours of investment became wasted, as well as many lost building and property sales.

72. Defendants did deprive Plaintiffs of the right to enjoy the fruits of their labor; Plaintiffs' property.
73. Defendants did deprive Plaintiffs of a fond Veterans' Day, Thanksgiving, Christmas and New Year in what might be Plaintiffs last Holiday Season in the Missouri Ozarks. Holidays spent in a small cabin and RV, on land Plaintiffs cut out of raw woods are cherished days for Plaintiffs and Defendants did deny Plaintiffs their right to this enjoyment of their property.
74. The ripple-effect-costs are many. Plaintiffs' funds to precipitate moving all personal belongings out of storage and out of Woodland Lakes in Missouri to Texas are tied up in this cause and/or blocked as a result of Defendants banning Plaintiffs access to Plaintiffs' property, which is an extreme inconvenience.
75. Plaintiffs' schedule in life has been completely consumed by the malicious, prejudicial and disturbing conduct of Defendants. Instead of moving into a stage of life anticipated for a lifetime, Plaintiffs are now in a full-time legal battle to regain personal

property and dignity.

76. Defendants' malicious and intentional conduct has damaged the property values in the development of Woodland Lakes. The County Tax Collector has, this year, put on the market, approximately 1,400 (fourteen hundred) Woodland Lakes lots for \$1.00 (one dollar) each.
79. Plaintiffs have suffered sleeplessness, fright, depression, loss of appetite and feelings of helplessness since Defendants acted with malicious intent and complete disregard for the truth toward Plaintiffs in depriving Plaintiffs their "residence," which did place Plaintiffs into positions in which preparation had not been achieved.
80. Plaintiffs' garden was lost as a result of Defendants' egregious conduct. Because Plaintiffs were locked out on the night of October 28, 2011, Plaintiffs were not able protect the garden.
81. Plaintiffs have suffered damage as a result of Defendants' disruptions. Plaintiffs' property is where Plaintiffs were staying while in Missouri. As a result of losing their "home," Plaintiffs did rent hotel rooms, incurring additional expense in food and survival items.
82. As a result of Defendants' actions, Plaintiffs have lost time, building sales, the quality of the 2011 Holiday Season, as well as

suffering pain, and continue to suffer the loss of quality of life.

83. Plaintiffs are being deprived of property which was improved as, or did contain the following: 1) countless hours spent hand-cutting woods, clearing & burning brush, and picking up rocks of various sizes, by hand; 2) bobcat work was hired out to cut a path for a circle driveway; 3) excavation was done in building a 50' RV pad pull-off with a tie-wall; 4) a cabin was bought and delivered, wired and insulated, double-pane vinyl windows installed and was set and leveled with underground wiring on three circuits, by Plaintiffs; 5) a 120' (one hundred twenty foot) trench was dug 3' (three foot) deep; 6) a 16' (sixteen foot) utility pole with a nightlight was added; 7) 200-amp service with an outdoor outlet; 8) 30-amp RV hookup; 9) 50-amp RV hookup; 10) bat house; 11) two ground rods; 12) a large 10' (ten foot) circle, two-foot-high, rock fire-ring; 13) additional nightlight placed by Crawford County Electric (who continue billing Plaintiffs for 12 months after new service); 14) tree swing; 15) basketball goal; 16) paddleboat; 17) raised garden; 18) water tanks; 19) natural resources; 20) various furniture 21) material for three sheds (Plaintiffs' Exhibit 22-24).

84. Plaintiffs have lost: 1) the benefit of trade tools (chainsaws, various landscaping equipment and trailers); 2) a cabin; 3)

basketball goal; 4) picnic tables; 5) paddle boat; 6) raised garden;
7) barn foundation; 8) barn trusses; 9) lumber for three sheds;
10) the benefits & enjoyment of their land; 11) labor and
investment; 12) quality of life; 13) liberty; and 14) prosperity;
and 15) profits from perspective building and land sales.

COUNT I
VIOLATION OF CIVIL RIGHTS
PURSUANT TO: TITLE 42 U.S.C. §1983,
ARTICLE 1, SECTION 19 OF THE TEXAS CONSTITUTION
ARTICLE 1, SECTION 10 OF MISSOURI CONSTITUTION
(Deprivation of Property Without Due Process of Law)

85. Plaintiffs readopt and reallege Paragraphs 1 through 84 as if fully set forth herein.
86. In committing the acts complained of herein, Defendants did act under the color of law in depriving Plaintiffs of certain constitutionally-protected rights under the Fourteenth Amendment of the Constitution of the United States, including, but not limited to: a) the right not to be deprived of liberty without due process of law; b) the right not to be deprived of property without due process of law; c) the right to be free from excessive use of force by persons acting under color of law; d) the right to just compensation for taking of property.
87. In violating Plaintiffs' rights as set forth above Defendants did act under the color of law by summoning the Washington