

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

Cause No.: 25CV-25-74

Petitioner:

Dave Campbell, Pro Se

Vs.

Respondent:

Hon. Chaney Wes Taylor, State District Judge

16th Judicial District Court and 14th State Judicial District Court

FILED
Office of the
Circuit Clerk
AUG 05 2025
Fulton County,
Arkansas

**MOTION TO SUPPLEMENT PETITION FOR WRIT OF PROHIBITION
AND REQUEST FOR CLARIFICATION AND RECUSAL**

COMES NOW PETITIONER Dave Campbell, appearing pro se and requesting to supplement his Petition of Prohibition with following new information, which could be crucial in determining the merits of the writ:

Supplemental Information:

1. Petitioner believes Respondent's actions set forth below demonstrate actual bias and creates an appearance of impropriety necessitating Respondent's removal from Case Numbers: CR24-141, CR24-142, CR24-143, and CR24-144.

2. Petitioner's petition was filed Friday, 08/01/25. On Monday, 08/04/25, Respondent was present in Mammoth Spring and made an appearance at the City Council Meeting at approximately 6:20 p.m.

3. Respondent's residence is approximately 60 (sixty) miles from Mammoth

Spring and Respondent was not on the meeting agenda. Respondent made eye contact with Petitioner during the meeting Respondent left the meeting shortly thereafter.

4. Petitioner confirmed it was Respondent at the meeting when Petitioner signed a petition for judge candidate, Maureen Herrod, who was also at the meeting.

Respondent signed the petition in the line preceding Petitioner's signature.

5. Respondent likely knew or should have known of Petitioner's presence at the meeting due to Petitioner's recording of the 07/07/25 council meeting about Respondent, which was attached as an exhibit to the petition for writ of prohibition.

6. Respondent's actions created an appearance of impropriety and could indicate bias.

7. Respondent carelessly disregarded the requirement of ACA 16-17-138 by failing to comply with the mandatory requirement to hold court sessions in Mammoth Spring.

8. Respondent already had improper and/or ex parte communication with Mammoth Spring's police chief regarding the unlawful venue, which is a breach of legal duties; therefore, Respondent could have been seeking another improper communication.

9. Petitioner believes these new developments support the petition for a writ of prohibition, particularly regarding Respondent's jurisdiction and impartiality.

10. Petitioner can think of no valid reason for Respondent to attend the 08/04/25 council meeting, especially since he did not attend the 07/07/25 meeting, which pertained to him; therefore, Petitioner suspects Respondent's presence on 08/04/25 was to influence and/or intimidate.

11. Petitioner requests clarification from Respondent for the reason for his 08/04/25 Mammoth Spring sudden appearance and quick departure.

12. Petitioner requests the issuance of the writ of prohibition, recusal of Respondent from Petitioner's case(s) and any other appropriate remedies.

WHEREFORE, Petitioner prays this motion is sustained and Respondent is ordered to respond to Petitioner's request for clarification and the petition for writ of prohibition.

BRIEF MEMORANDUM IN SUPPORT OF MOTION

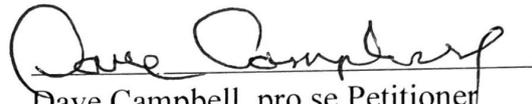
Respondent failed to hold Court in Department of Mammoth Spring under ACA 16-17-138. Arkansas law requires district courts to hold court in each department at least once a month, unless waived by written agreement and ordinance. This is not happening; therefore, Respondent is in violation. Respondent made an agreement with Police Chief Turnbough to hold court in an *"unlawful venue."*

Respondent Taylor could have been participating in ex parte communications. The agreement between Respondent and the police chief to hold court in an improper venue, appears to be an improper ex parte communication, due to Petitioner's cases being involved and the prosecutor not being involved, which would be violate American Bar Association Model Code of Judicial Conduct Rule 2.9. Respondent could have been in Mammoth Spring on August 04, 2025 to interfere with witnesses, such as Chief Turnbough or to intimidate Petitioner, who Respondent should have known would be present to record the city council meeting since Respondent knew about Exhibit Six.

There is an appearance of impropriety and/or bias. Respondent's actions of

traveling a considerable distance to appear at a city council meeting the following business day after Petitioner's Petition for Writ of Prohibition is filed creates an appearance of impropriety or bias. Arkansas judicial conduct rules emphasize maintaining the dignity of judicial office and avoiding even the appearance of impropriety. Respondent apparently did not have a purpose to be at the meeting, because Respondent left soon after making eye contact with Petitioner.

Respectfully submitted,

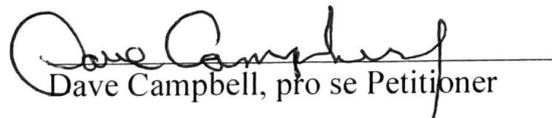


Dave Campbell, pro se Petitioner
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(870) 907-0572
Signed 08/05/25

CERTIFICATE OF SERVICE

I, Dave Campbell, certified to have mailed a copy of the foregoing motion and associated documents on the 5th day of August, 2025 to the following:

1. Hon. Chaney Wes Taylor, State District Judge
549 W. Main, Batesville, AR, 72501
ChaneyT2000@gmail.com
2. 16th Judicial District Court and 14th State Judicial District Court
% Fulton County District Clerk Brandon Holder:
FultonCountyDC@gmail.com.
3. Brandy Dickerson at 16pa.brandy@gmail.com;
4. Mammoth Spring City Attorney William T. Hass at hasslaw@juno.com;
5. Mammoth Spring Municipal Court Clerk at cityofmammothspring@gmail.com.



Dave Campbell, pro se Petitioner