

IN THE CIRCUIT COURT OF THE COUNTY OF WASHINGTON  
STATE OF MISSOURI

WOODLAND LAKES TRUSTEESHIP, INC., )

Plaintiff, )

vs. )

DAVID CAMPBELL, a/k/a DAVE CAMPBELL )  
and CATRENIA CAMPBELL, )

Defendants. )

Case No. 13WA-CC00410

Transferred from Crawford County  
Circuit Court as

Case No. 12CF-CC00030

Division No.

SUPPLEMENTAL AND CORRECTED  
AFFIDAVIT OF DEBORAH "DEBBIE" A. CLUTTER

After first being duly sworn upon my oath, I state as follows:

1. I am over the age of eighteen (18) and competent to give this Affidavit.
2. I am a resident of the State of Missouri.
3. I am the office manager and book keeper of Plaintiff Woodland Lakes Trusteeship, Inc.
4. I have first-hand knowledge of the facts contained in the Petition and Counterclaim filed on behalf of Defendant.
5. Plaintiff Woodland Lakes Trusteeship, Inc. is a Missouri not-for-profit corporation in good standing.
6. Assessments on all lots within the subdivision are due on September 1 of each calendar year.
7. Lot owners are given until October 1 of each year to pay these assessments.

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8. Clarifying paragraphs 20 and 21 of my original Affidavit, Defendants Dave and Catronia Campbell (hereinafter, the "Campbells") failed and refused to pay assessments owing on their four lots by October 1, 2012.
9. To clarify my initial Affidavit, Defendants were twice denied vehicular access in 2011 during their ownership of the four lots in question for different reasons.
10. Correcting paragraph 10 of my original Affidavit, the Campbells have not made any payments towards their assessments owing to the Plaintiff since October 29, 2011.
11. Defendants were first denied vehicular ingress and egress within the subdivision on October 27, 2011 when they refused to pay assessments then owing on lots numbered 3-2-11 and 20-3-19.
12. These assessments were past due from the previous owner of the lots and ran with the land when the Campbells purchased those lots in 2011.
13. The Campbells paid those assessments on October 29, 2011.
14. On October 29, 2011, the Campbells were allowed vehicular ingress and egress within the subdivision once again.
15. Defendants were occupying a camper within the subdivision without a septic or sewer system connected for more than 140 days in the calendar year of 2011.
16. On November 11, 2011, the Campbells were given notice that they had exceeded the 140-day limit for living on a multi-purpose lot within a calendar year on lot 25-4-19 and that their vehicular ingress and egress would be denied on November 12, 2011.
17. The Campbells were sent a letter on February 11, 2012 reminding them that they were permitted vehicular ingress and egress in the subdivision on January 1, 2012. See Exhibit "2-A" attached to this supplemental affidavit of Deborah Clutter and incorporated herein more fully by reference.

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