

IN THE CIRCUIT COURT OF BENTON COUNTY, ARKANSAS

KRISTA WEBB  
AND SHANDA WEBB

PLAINTIFFS

VS.

CASE NO.

JEFFERY WEST  
AND SHANNON ROSSITER

DEFENDANTS

COMPLAINT IN UNLAWFUL DETAINER

Plaintiffs, Krista Webb and Shanda Webb, by their attorney, John M. Blair, for their Complaint against the defendants, Jeffery West and Shannon Rossiter, state:

1. Plaintiffs' claim is for the unlawful detainer of certain real property situated in Benton County, Arkansas.
2. Plaintiffs are the owner of a house at 12307 Cavewood Road, Rogers, Arkansas 72756. Defendants entered into a month to month lease agreement with the Plaintiffs which was to end on October 1, 2021.
3. Defendants are currently residing in and are in possession of the Premises located at 12307 Cavewood Road, Rogers, Arkansas 72756 and have failed to pay monthly rent in the amount of \$600.00 since October 1, 2021. Defendants have failed to pay a Carroll Electric bill in the amount of \$441.95.
4. A three (3) day written notice to quit and demand for possession was served on Defendants on January 18, 2022, a copy of which is attached to this Complaint as Exhibit "A", but Defendants have refused to quit possession of the Premises and still willfully hold and unlawfully detain same from Plaintiffs.
5. Defendants are in arrears in rent and utilities in the amount of \$ 4,041.95.


6. Defendants own Pitbull dogs which, on September 24, 2021, mauled Plaintiffs' aunt, Patti Webb, to death. Since the attack, said dogs have bitten Plaintiff, Krista Webb, and have caused Plaintiff, Shanda Webb, to be trapped in her vehicle due to the dogs threatening to attack. No accident has been taken by any authority regarding the dogs.

7. Defendant, Shannon Rossiter, was arrested for possession of drugs at the residence on September 8, 2021, which violates the terms of the original lease.

8. Plaintiffs are entitled to a Writ of Possession of the Premises, and the cost of this action and attorney fees.


WHEREFORE, Plaintiffs pray the following relief:


An order of possession of the Premises; judgment against Defendants for statutory damages for unlawful detainer of the premises; and for its costs, and for all other proper and just relief.

  
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John M. Blair Ark. Bar # 82-018  
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#### VERIFICATION

I hereby certify that the above and foregoing information is true and correct.

  
\_\_\_\_\_  
KRISTA WEBB

  
\_\_\_\_\_  
SHANDA WEBB

STATE OF ARKANSAS    )  
  )ss.  
COUNTY OF BENTON    )

Subscribed and sworn to before me this 10th day of March, 2022.

My Commission Expire:

July 8, 2024



Karen Blair  
Notary Public

Exhibit "A"

**NOTICE OF EVICTION**

As of Tuesday, January 18th, 2022 this notice is hereby given to *Jeffery West* and *Shannon Rossiter*, to whom reside at 12307 Cavewood Road in Rogers, Arkansas 72756.


This notice is being given to you in accordance with Arkansas state law by **Shanda Webb & Krista Webb**, which are the distributees of the estate of Patti S. Webb and are recognized as such by the *Benton County, Arkansas Clerk of Courts*.

You are hereby given this **3-Day Pay or Vacate Notice** due to:

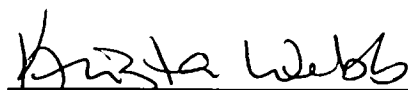
- Nonpayment of partial rent for October 2021 per the agreement held by Mr. West and the late Ms. Patti Webb in the amount of **\$450.00**.
- Nonpayment of the rent per the agreement held by Mr. West & Shannon Rossiter with Shanda Webb & Krista Webb for the months of November 2021, December 2021, and January 2022 totaling the amount of **\$1,800.00 (\$600.00 due each month)**
- Nonpayment of the remaining balance for the previous electric bill with Carroll Electric that was in the late Patti Webb's name in the amount of **\$441.95**.

After several unsuccessful attempts to collect the debt that is mentioned above, and after several unsuccessful attempts to make a payment arrangement, we have deemed it necessary that **NO LATER THAN THE TIME OF 5:00pm ON FRIDAY, January 21, 2022** you must pay the total amount due of **\$2691.95** OR vacate the premises with **ALL** of your personal belongings, pets, and vehicles. At that time you will surrender every and all keys in your possession or in the possession of others to which you have given out (example: relatives and/or friends) to Shanda Webb and Krista Webb and be immediately trespassed off the property and will not be allowed to return for any reason whatsoever.

If you fail to comply with this notice we will then, at that time, file for a criminal eviction and civil suit against the both of you in accordance with state and county laws for the total amount due and for any damages done to the residence and the property in the process.

  
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January 18, 2022

  
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January 18, 2022

Krista Webb