IN THE CIRCUIT COURT OF POPE COUNTY, ARKANSAS DOMESTIC RELATIONS DIVISION IV

VICKIE LYNN HENDERSON

VS.

CASE NO.: 58DR-16-621

KENNETH LEE HENDERSON

PLAINTIN ZAMENT CLERK DEFENDANT ZAMENT DEFENDANT DEF

PETITION FOR CONTEMPT

Comes now the Defendant by and through his attorney Jeff Phillips and for his Petition for Contempt states:

- That this Court has jurisdiction of the parties and subject matter.
- 2. That on November 21, 2016, the Court entered a Temporary Order. In Paragraph 7 of the Order the Court entered the following injunction, "each of the parties shall be enjoined from in any manner harassing, molesting or vilifying the other during the pendency of this cause. Neither party shall dispose of or encumber any property which may be considered to be marital property."
- 3. That the Plaintiff has continually willfully violated the Court's order by bothering and harassing the Defendant and by disposing of marital property. The Plaintiff has consistently taken the position that all the marital property is hers and half does not belong to the Defendant.
- 4. That the Plaintiff has more specifically bothered and harassed the Defendant in the following ways:
 - a. January, 2017, the Plaintiff threatened to kick the Defendant out of the residence referred to in the Temporary Order as the barn because of where he was sitting in the House of Representatives. This behavior was harassing and threatening in nature.

- b. March, 2017, the Plaintiff made reference by voicemail that her lawyer was "trying to make everything public to try to destroy Defendant's political career". Plaintiff was discussing this with the Defendant and, in effect, bothering and harassing him.
- c. April 25, 2017, the Plaintiff requested to meet Defendant at the marital home. When the Defendant arrived she became more angry and eventually started yelling. She also attacked the Defendant calling him names. She picked up a picture and threw it across the room at the Defendant. The picture hit the wall and the glass shattered. This behavior is willful in nature and violated the Court's order of bothering and harassing.
- d. November, 2017, the Plaintiff contacted Defendant stating that if he would agree to the property settlement agreement that he had previously disagreed with then she would agree to drop the perjury charges against him. There are no perjury charges against the Defendant at the time she made this allegation nor are there any now. This contact places the Plaintiff in willful contempt of the Court's order.
- e. November, 2017, at a public gathering the Plaintiff was combative and abusive to the Defendant. She harassed him and was in willful contempt of the Court's previous order.
- The Defendant reserves the right to provide proof of other violations of the court's previous order.
- 6. That the Defendant requests that the Plaintiff be found in willful contempt of the court's order for her actions as stated herein and instructing the Plaintiff to comply with all existing court orders and that appropriate sanctions, including a reasonable attorneys fee and costs of this action be imposed to deter her from engaging in further combative behavior.

WHEREFORE, Defendant prays this Court find the Plaintiff in willful contempt for her actions as stated herein; that appropriate sanctions be ordered; for attorney's fees and costs and any and all other just and proper relief which this Court may deem proper.

KENNETH LEE HENDERSON, DEFENDANT

JEFF PHILLIPS, #90143

PHILLIPS & VEACH, P. A. Attorneys at Law 312 West Main Russellville, Arkansas 72801 (479) 967-8100 - Telephone (479) 890-6957 - Fax

VERIFICATION

I, Kenneth Lee Henderson, do state that the allegations contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief.

Kenneth L Henderson

STATE OF ARKANSAS COUNTY OF YOU

Subscribed and sworn to before me, a Notary Public, on this 12 day of

Votary Public

Omuary , 2018.

My commission expires: