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GREENWOOD DIST.
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CIR. CLERK SEB. CO.

IN THE CIRCUIT COURT OF SEBASTIAN COUNTY, ARKANSAS
GREENWOOD DISTRICT
DOMESTIC RELATIONS DIVISION

CHARITY BEALLIS

PLAINTIFF

VS.

CASE NO.: 66GDR-25- 40 (III)

RANDALL BEALLIS

DEFENDANT

VERIFIED COMPLAINT FOR DIVORCE

COMES NOW the Plaintiff, Charity Beallis, by and through her attorney, Nathan Roop, and for her Complaint for Divorce states the following:

1. Plaintiff is an adult resident of Sebastian County, Arkansas, and has been for the last sixty days.
2. Defendant is an adult resident of Sebastian County, Arkansas.
3. This court has subject matter jurisdiction, and the venue is proper with this court.
4. That the parties were married on or about November 11, 2015.
5. The parties last lived together on or about February 16, 2025. The parties have lived separately and apart since.
6. That there are two children born of these parties namely M.B. born in 2019, and E.B. born in 2019. No further children are expected.
7. That the court should find the joint custody presumption is not appropriate in this matter.

The Plaintiff believes that it is in the best interests of the minor children that she be

awarded sole custody due to the following:

- a. The Defendant is currently facing criminal charges related to domestic violence;
 - b. As a result of said criminal charges, the Defendant is currently under a court-ordered no-contact order, which prohibits any contact with the minor children and the Plaintiff;
 - c. That the Defendant has a history of domestic violence within the marital residence;
8. That the Defendant should not be ordered any visitation due to the current criminal case and no contact order. That if the Defendant is ordered any visitation, then it should be ordered to be supervised at STEPS, Inc., Fort Smith, Arkansas.
 9. That the Plaintiff requests the Defendant submit to a psychological evaluation by a licensed mental health provider pursuant to A.R.C.P. 35.
 10. That the Defendant should be ordered to complete an Anger Management screening and follow any recommendations of said screener.
 11. That the Defendant has a disclosed history of substance abuse and based upon his recent behavior and criminal conduct, the Plaintiff is under the information and belief that the Defendant is abusing illegal substances and requests that this Court order the Defendant to submit to a fingernail clipping drug screening.
 12. That child support should be addressed pursuant to the requirements set forth in Administrative Order No. 10. That said child support should be based upon a non-joint custodial child support worksheet.
 13. That this Court should enter an order for spousal support in this matter.
 14. That this Court's Standard Order Regarding Children's Medical and Dental is attached

and should apply between these parties.

15. Said marriage is not a covenant marriage under the *Covenant Marriage Act of 2001*, pursuant to Ark. Code Ann. § 9-11-801.
16. That there are issues of personal property over which this Court needs to exercise its jurisdiction and make equitable division.
17. That there are issues of real property and marital debt to be determined by this Court if the parties are unable to reach an agreement.
18. That this Court should evenly divide all 401k and investment accounts in the parties' names.
19. The parties share real property located at [REDACTED] Bonanza, Arkansas 72916. Due to the Defendant's arrest and subsequent no contact order, the Plaintiff is currently in possession of the marital property. The Court should enter an order that the Plaintiff shall remain in possession of the parties' marital residence, where the minor children reside, during the pendency of this matter. The Plaintiff should ensure that all utilities remain current and be prohibited from shutting off services to the marital property.
20. The parties should be enjoined from accruing any new marital debt from the date of separation, including any new debts associated with the marital residence at [REDACTED] [REDACTED] Bonanza, Arkansas 72916.
21. Neither party is a member of the armed services of the United States.
22. Each party should be enjoined and restrained from harassing or bothering the other as provided by this Court's Standing Orders.
23. In the event that the Plaintiff is unable to obtain service of process upon the Defendant

within 120 days of the date of filing, the Plaintiff moves the Court for an Order granting an extension of time in which to obtain service of process pursuant to the provision of Rule 4(I) Arkansas Rules of Civil Procedure.

24. That the Plaintiff is entitled to a divorce from the Defendant, pursuant to ARK. CODE ANN. 9-12-301(b)(3)(C), general indignities, which have occurred throughout this marriage, and have rendered the Plaintiff's condition intolerable.
25. That the Plaintiff would request a temporary hearing on the issues of custody, visitation, and both spousal and child support at this Court's earliest convenience.
26. That the Plaintiff waives venue in this matter and respectfully requests that any hearings be held in the Sebastian County Court's Building located at 901 South B Street, Fort Smith, AR 72901.
27. That Administrative Order No. 1 is attached and incorporated into this Complaint for Divorce.

WHEREFORE, the Plaintiff prays for an absolute divorce from Defendant on the grounds of general indignities, along with rulings on support, for his attorney's fees and costs, and for all other proper relief to which he may be entitled.

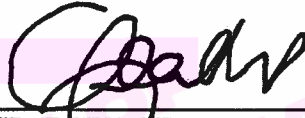
RESPECTFULLY SUBMITTED,
CHARITY BEALLIS, PLAINTIFF

BY: /s/ Nathan Roop
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VERIFICATION

STATE OF ARKANSAS)
COUNTY OF Sebastian)

Comes now, CHARITY BEALLIS, and having been first duly sworn, states on oath that she has read personally, or has had read to her, the statements contained in the above and foregoing pleading and states that the matters herein contained are true and correct to the best of her knowledge, information and belief.



CHARITY BEALLIS

Subscribed and sworn to before me this 4th day of March, 2024.


Notary Public

My Commission Expires:

May 1, 2030