

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

CHARITY L. BEALLIS

PLAINTIFF

V.

66GDR-25-40

RANDALL SCOTT BEALLIS

DEFENDANT

VERIFIED MOTION FOR HAIR FOLLICLE DRUG AND ALCOHOL TEST

COMES NOW the Plaintiff, Charity L. Beallis, (hereinafter "Mother"), by and through her undersigned counsel, and for her Verified Motion for Hair Follicle Drug and Alcohol Test, states as follows:

1. The parties were married (initially) in 2012, having divorced one another in a case styled as *Beallis v. Beallis*, 66FDR-12-892 (hereinafter the "First Marriage")
2. The parties reconciled in a dating relationship sometime in 2013. They then remarried one another on or about November 11, 2015 (hereinafter, the time period from 2013 to present is referred to as the "Reconciliation and Remarriage").
3. The parties separated on February 16, 2025 after a domestic violence incident, for which Defendant ("Father") has been charged in the case styled as *State v. Randy Scott Beallis*, 66GCR-25-31 (hereinafter the "Criminal Case").
4. On or about March 31, 2025, and in the course of the investigation related to the Criminal Case, the parties' minor children, male-female twins born in 2019,

disclosed an act of child abuse perpetrated by their Father upon them in July 2024. The disclosure included detailed statements regarding Father suffocating the children and threatening to harm them if they told anyone. On information and belief, a child abuse investigation was opened and the allegations were found to be true. A true and correct copy of the Child Maltreatment True Investigative Determination Notice is attached hereto and incorporated herein as **Exhibit "A."**

5. Mother represents to the Court, under oath, that during the First Marriage, there was infidelity but Mother does not know of any drug/alcohol abuse or domestic abuse.
6. However, during the Reconciliation and Remarriage, specifically around August 2013, Father beat Mother and almost strangled her to death. He then portrayed her as the aggressor and had her arrested. The charges were dropped. Mother believes Father to have been abusing alcohol and illegal narcotics during that attack.
7. The parties split briefly after the August 2013 incident, but reconciled in 2015. Between the years 2015 and Mother's pregnancy with the twins in 2019, Father physically abused Mother numerous times, with three such times being the worst. One such time included Father holding a shotgun to her face. During each attack, Father was under the influence of alcohol and/or illegal narcotics, including heroin.

8. Once the twins were born, Father's abuse converted to mainly psychological/emotional and financial. However, his temper shifted with his use of alcohol and illegal narcotics. Mother has personal knowledge that Father drinks to excess, specifically whiskey and gin. Mother also has personal knowledge that Father has abused heroin in the past. Mother believes that his extreme rage is directly related to his drug and alcohol use.
9. However, Father's extreme physical abuse retruned in February 2025, and Mother believes Father to have been under the influence of heroin on the date in question.
10. That the above-entitled proceedings will involve child custody, child visitation and the welfare of a minor child; that pursuant to **Ark. Code Ann. § 9-13-109**, Mother requests that Defendant ("Father") submit himself to a ninety (90) day, twelve (12) panel extended hair follicle with added detection for alcohol-usage levels at **APPLICANT INFORMATION, 7612 TAYLOR AVENUE, FORT SMITH AR 72916 (479 649 8601)**; that Mother will prepay for said tests; that if Father fails said tests, Mother requests reimbursement thereof within ten (10) days of receiving such positive results. Failure is defined as positive for any substance for which Father does not have a valid prescription and moderate or excessive alcohol consumption.
11. Mother requests that the Court order Father not to color, bleach, shave, or otherwise alter/adulterate his hair sample prior to the test. If a sufficient amount

of hair cannot be obtained, Mother requests that the test be automatically converted to a nailbed test at Father's expense.

12. Father should present to the testing facility within twenty-four (24) hours of entry of this Order.

13. If Father adulterates the sample of hair or nailbed, and/or fails to present within the ordered time, the Court should deem Father positive for all tested substances with an alcohol usage level of excessive consumption.

WHEREFORE, PREMISES CONSIDERED, Mother prays that the Court grants his Motion and that an Order be issued ordering Father to undergo a 90-day hair follicle drug test within twenty-four (24) hours of the Order being entered, that the Court adjudicate the Father's test results as positive should he refuse to comply in the manner set forth above, for her costs and attorney's fees as allowed by law, and for any and all other relief that the Court deems just and proper.

Respectfully submitted,

CHARITY BEALLIS

By: /s/Jacqueline Mock
Jacqueline Mock, #2011180
Mock Legal Solutions PLC
P.O. Box 10436
Fort Smith, AR 72917
479.769.1505
mocklegalsolutions@gmail.com
mocklegal.misty@gmail.com

Cc:

Attorney for Plaintiff-Mother

VERIFICATION

I, CHARITY BEALLIS, Plaintiff-Mother herein, state that I have read the above and foregoing pleading and the facts contained therein as recited by me are true and correct.

SWORN to by me on this 17th day of September, 2025.

Charity Beallis

CHARITY BEALLIS

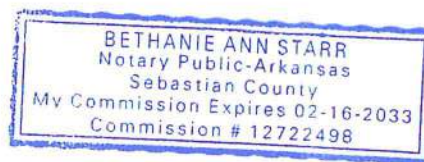
SUBSCRIBED AND SWORN TO before me, a Notary Public, this 17th day of September, 2025

[Signature]

Notary Public

My Commission Expires:

02-16-33



CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing pleading has been served on Defendant by e-flex notification to his attorney on the 16th day of September, 2025, to:

Michael Pierce
Via e-flex notification

/s/Jacqueline Mock

**COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR**



ARKANSAS STATE POLICE

CRIMES AGAINST CHILDREN



Child Maltreatment True Investigative Determination Notice to
☒ Victim ☒ Legal Parent(s) ☐ Legal Guardian(s) of the Alleged Victim

To: Ellianna and Maverick Beallis c/o Charity Beallis
Address: [REDACTED]
From: CACD Alora Perry
704 Cloverleaf Plaza
Van Buren, AR 72956
Office: Sebastian
Phone: 479-755-7344
Date: 07/15/2025
Referral: 2337588

RE: Name of Alleged Victim(s): Ellianna and Maverick Beallis

Name of Alleged Offender(s): Randy Beallis

The Arkansas State Police – Crimes Against Children Division received an allegation of suspected child maltreatment involving the above named people. The incident was reported on 03/31/2025.

Pursuant to Arkansas Code Ann. §12-18-708, this is your notice that:

- ☒ Based on the preponderance of the evidence, the investigative agency determined the allegation to be true, and the offender's name should be placed in the Child Maltreatment Central Registry.
- ☐ Based on the preponderance of the evidence, the investigative agency determined the allegation to be true, but exempt, and the offender's name should not be placed in the Child Maltreatment Central Registry.

The type of maltreatment was abuse (abuse with or without physical injury for both children) and abuse (threat of harm with Maverick)

Please note that the alleged offender has a right to contest the agency investigation determination by requesting an administrative hearing within thirty days of notice of the investigative determination. Approximately one-half of the agency's investigative determinations are upheld by the administrative law judges. The alleged offender's name will not be placed on the Child Maltreatment Central Registry until the later of:

- (A) The expiration of thirty days without a hearing request; or
(B) The day the Administrative Law Judge hands down a hearing decision upholding the true investigative determination.

Alora Perry

Investigator Printed Name

Investigator Signature

CACD-225-T1 (02/2023)

EXHIBIT A