

**IN THE DISTRICT COURT OF TEXAS COUNTY
STATE OF OKLAHOMA**

AMANDA VERNER)
Personal representative of the estate)
of Veronica C. Butler)

Plaintiff,)

v.)

TIFANY M. ADAMS, individually)
And as Trustee and/or Co-Trustee of the)
Adams Girls' Revocable Trust,)

Serve:)

Tiffany M. Adams)

Texas County Jail)

1102 S. Ellison St.,)

Guymon, Oklahoma 73942)

and)

ADAMS GIRLS' REVOCABLE TRUST)
DATED OCTOBER 1, 1995)

Serve:)

Tiffany M. Adams)

Texas County Jail)

1102 S. Ellison St.,)

Guymon, Oklahoma 73942)

and)

THE CLYDE E. ADAMS)
REVOCABLE LIVING TRUST)
DATED JUNE 23, 2005)

Serve:)

Tiffany M. Adams)

Texas County Jail)

1102 S. Ellison St.,)

Guymon, Oklahoma 73942)

and)

Case No. CJ-2025-13

TEXAS COUNTY
FILED

MAR - 3 2025

M. RENEE ELLIS
COURT CLERK

By me Deputy

ADAMS FAMILY FARMING, LTD)
<i>Serve:</i> Registered Agent)
Tiffany M. Adams)
Texas County Jail)
1102 S. Ellison St.,)
Guymon, Oklahoma 73942)
)
and)
)
KARAT TOP WEED AND)
PEST CONTROL)
<i>Serve:</i> Registered Agent)
Tiffany M. Adams)
Texas County Jail)
1102 S. Ellison St.,)
Guymon, Oklahoma 73942)
)
And)
)
COLE E. TWOMBLY)
<i>Serve at:</i> Registered Agent)
Texas County Jail)
1102 S. Ellison St.,)
Guymon, Oklahoma 73942)
)
and)
)
CORA G. TWOMBLY)
<i>Serve at:</i>)
Texas County Jail)
1102 S. Ellison St.,)
Guymon, Oklahoma 73942)
)
and)
)
TWOMBLY CATTLE CO.)
<i>Serve:</i> Registered Agent)
Cole E. Twombly)
Texas County Jail)
1102 S. Ellison St.,)
Guymon, Oklahoma 73942)
)
and)

)
TAD BERT CULLUM, individually)
and as Trustee and/or Co-Trustee of the)
TSC Hanes Revocable Trust dated)
June 11, 2020)
<i>Serve at:</i>)
Texas County Jail)
1102 S. Ellison St.,)
Guymon, Oklahoma 73942)
)
and)
)
TSC HANES REVOCABLE TRUST)
DATED JUNE 11, 2020)
<i>Serve at:</i>)
Texas County Jail)
1102 E. Ellison St.,)
Guymon, Oklahoma 73942)
)
and)
)
CULLUM FARMS, LLC)
<i>Serve:</i> Registered Agent)
Tad B. Cullum)
Texas County Jail)
1102 S. Ellison St.,)
Guymon, Oklahoma 73942)
)
And)
)
PAUL J. GRICE)
<i>Serve at:</i>)
Texas County Jail)
Inmate #)
1102 S. Ellison St.,)
Guymon, Oklahoma 73942)
)
)
Defendants)

**WRONGFUL DEATH PETITION FOR DAMAGES AND TO INSTATE
RECEIVERSHIP OF ASSETS**

COMES NOW Plaintiff Amanda Butler Verner as personal representative of Decedent
Veronica C. Butler, by and through her undersigned counsel, and for her *Wrongful Death Petition*

for Damages and to Instate Receivership of Assets (hereinafter "Plaintiff's Petition") against Defendants Tiffany M. Adams, individually and as the Trustee and/or Co-Trustee of the Adams Girls' Revocable Trust; The Clyde E. Adams Revocable Living Trust; Adams Family Farming, LTD; Karat Top Weed and Pest Control; Cole E. Twombly; Cora G. Twombly; Twombly Cattle Co.,; Tad B. Cullum, Trustee and/or Co-Trustee of the TSC Hanes Revocable Trust, Cullum Farms, LLC, Cullum Family Farms, LLC, and Paul Grice and state, allege, and aver as follows:

PARTIES

1. Plaintiff Amanda Butler Verner (hereinafter "Plaintiff") is, and at all times relevant hereto was, a Kansas resident and the personal representative of the estate of Decedent Veronica C. Butler and is therefore the individual entitled to bring a cause of action for the wrongful death of Veronica C. Butler pursuant to 12 O.S.A. § 1053 for the benefit of the wrongful death beneficiaries under 12 O.S.A. § 1053 (B).

2. Decedent Veronica C. Butler (hereinafter "Decedent" or "Veronica") was the daughter of Plaintiff and, at all times relevant hereto, was a Kansas resident.

3. Defendant Tiffany M. Adams (hereinafter "Adams") is an individual that was residing in Keyes, Cimarron County, Oklahoma at the time of the occurrences that form the basis of this Petition. Upon information and belief, Adams is also, or was at all relevant times, the Trustee and/or Co-Trustee of the Adams Girl's Revocable Trust. Adams is currently in the custody of the Texas County Jail, 1102 S. Ellison St., Guymon, Oklahoma 73942. She may be served at the Jail by the Texas County Sheriff, 1102 S. Ellison St., Guymon, Oklahoma 73942.

4. Upon information and belief, Adams is also, or was at all relevant times, the Trustee and/or Co-Trustee of The Clyde E. Adams Revocable Living Trust dated June 23, 2005 (hereinafter "Clyde E. Adams Revocable Trust"). Adams is currently in the custody of the Texas County Jail.

1102 S. Ellison St., Guymon, Oklahoma 73942. She may be served at the Jail by the Texas County Sheriff, 1102 S. Ellison St., Guymon, Oklahoma 73942.

5. Adams Family Farming, Ltd. (hereinafter "Adams Family Farms") is an Oklahoma limited liability company that may be served by delivering the summons to its registered agent Tiffany Adams, who is currently in the custody of the Texas County Jail, 1102 S. Ellison St., Guymon, Oklahoma 73942. She may be served at the Jail by the Texas County Sheriff, 1102 S. Ellison St., Guymon, Oklahoma 73942.

6. Karat Top Weed and Pest Control (hereinafter "Karat Top") is a trade name of Defendant Tiffany M. Adams that may be served by delivering the summons to Tiffany Adams, who is currently in the custody of the Texas County Jail, 1102 S. Ellison St., Guymon, Oklahoma 73942. She may be served at the Jail by the Texas County Sheriff, 1102 S. Ellison St., Guymon, Oklahoma 73942.

7. Defendant Cole E. Twombly (hereinafter "Cole") is an individual that was residing in Texahoma, Texas County, Oklahoma at the time of the occurrences that form the basis of this Petition. Cole is currently in the custody of the Texas County Jail, 1102 S. Ellison St., Guymon, Oklahoma 73942. He may be served at the Jail by the Texas County Sheriff, 1102 S. Ellison St., Guymon, Oklahoma 73942.

8. Defendant Cora G. Twombly (hereinafter "Cora") is an individual that was residing in Texahoma, Texas County, Oklahoma at the time of the occurrences that form the basis of this Petition. Cora is currently in the custody of the Texas County Jail, 1102 S. Ellison St., Guymon, Oklahoma 73942. She may be served at the Jail by the Texas County Sheriff, 1102 S. Ellison St., Guymon, Oklahoma 73942.

9. Twombly Cattle Co. is an Oklahoma corporation, which may be served by delivering the summons to its registered agent Cole E. Twombly who is currently in the custody of the Texas County Jail, 1102 S. Ellison St., Guymon, Oklahoma 73942. He may be served at the Jail by the Texas County Sheriff, 1102 S. Ellison St., Guymon, Oklahoma 73942.

10. Defendant Tad B. Cullum (hereinafter "Cullum") is an individual that was residing in Keyes, Cimarron County, Oklahoma at the time of the occurrences that form the basis of this Petition. Upon information and belief, Cullum is also, or was at all relevant times, the Trustee and/or Co-Trustee of the TSC Hanes Revocable Trust dated June 11, 2020. Cullum is currently in the custody of the Texas County Jail, 1102 S. Ellison St., Guymon, Oklahoma 73942. He may be served at the Jail by the Texas County Sheriff, 1102 S. Ellison St., Guymon, Oklahoma 73942.

11. Cullum Farms, LLC (hereinafter "Cullum Family Farms") is an Oklahoma, LLC, which may be served by delivering the summons to its registered agent Tad B. Cullum, who is currently in the custody of the Texas County Jail, 1102 S. Ellison St., Guymon, Oklahoma 73942. He may be served at the Jail by the Texas County Sheriff, 1102 S. Ellison St., Guymon, Oklahoma 73942.

12. Defendant Paul J. Grice (hereinafter "Grice") is an individual that was residing in Keyes, Cimarron County, Oklahoma at the time of the occurrences that form the basis of this Petition. Cullum is currently in the custody of the Texas County Jail, 1102 S. Ellison St., Guymon, Oklahoma 7394. He may be served at the Jail by the Texas County Sheriff, 1102 S. Ellison St., Guymon, Oklahoma 7394.

JURISDICTION AND VENUE

13. Subject matter jurisdiction is proper in this Court as it is a court of general jurisdiction.

14. General Personal jurisdiction is proper against all Defendants in that each of them resides in Oklahoma and may be served in Oklahoma and committed tortious acts in Oklahoma.

15. Venue is proper in this Court as the defendants reside in this county and the actions which give rise to this cause of action occurred in this county.

FACTS COMMON TO ALL COUNTS

Custody Dispute

16. Veronica C. Butler (“Decedent” or “Butler”) was a mother of two minor children (hereinafter “the Children”) with Wrangler Rickman (hereinafter “Rickman”).

17. Defendant Adams is the mother of Rickman and grandmother of the Children.

18. In 2019, Veronica and Rickman separated, beginning a protracted and bitter custody battle over the Children between Veronica and Rickman in Cimarron County, Oklahoma.

19. On May 5, 2021, after a 2-day trial, Veronica was awarded full custody of her two Children and Rickman was awarded standard visitation rights.

20. During all relevant times, Adams was on the board of Cimarron County Hospital (hereinafter “the Hospital”).

21. In her capacity as a member of the board of directors of the Hospital, Adams stated to the Board that Veronica repeatedly exposed the Children to her brother, whom Adams falsely alleged had sexually assaulted them.

22. Using her position on the board of the Hospital, Adams used Hospital resources and/or personnel to falsify Hospital records to push the narrative that Veronica’s brother had sexually assaulted the Children.

23. Therefore, Adams used her influence and position on the board and the board’s resources to misrepresent to the Court that Veronica exposed the Children to sexual assault by her brother, which was false.

24. Adams falsified hospital records and submitted them as evidence to the Court for the purposes of manipulating the proceedings as part of a scheme to gain full custody and control of the Children and keep them from Veronica.

25. On December 7, 2022, following an appeal by Rickman and based on the falsified records and false statements of Adams, her son Rickman was awarded full custody of the Children while Veronica was awarded limited supervised visitation rights.

26. Veronica was a nurse working full-time shifts. She loved her children dearly and cherished and protected the time she was allowed to spend with them despite her trepidation and worry about the threats Adams had made against Veronica and the Judge on the case; Adams demonstrated malfeasance in relation to the hospital records; and Rickman's history of domestic violence, substance abuse and prior criminal arrests.

27. Jilian Kelley was a local pastor's wife and had young children of her own.

28. As part of the order granting Veronica limited supervised visitation rights, Veronica was only to have visitation with the Children every Saturday with a court-approved supervisor that she was required to pay.

29. Jilian D. Kelley (hereinafter "Jilian") was approved by the court to supervise Veronica's visits with the children and was to be paid out of Veronica's nursing salary when she accompanied Veronica to visit with the Children.

30. Upon information and belief, at some point Adams unilaterally took custody of the Children from her son, purportedly due to Rickman's legal and substance abuse issues and/or his unwillingness to adhere to Adams' demands/control of the children.

31. Adams then intervened in the custody dispute between Veronica and Rickman in an attempt to gain control over the Children.

32. In mid- to late- February of 2024, Adams began making overt threats against the Cimarron County Judge overseeing the custody battle in an effort to intimidate the Judge into awarding Adams full custody and control of the Children. As a result, the judge was placed under police protection. Adams made specific statements about knowing where the judge resided and the path that she walked to work.

33. On or about March 13, 2024, the Court discovered that Adams had been illegally withholding the Children from both of their parents.

34. On or about March 18, 2024, Veronica filed a motion for extended visitation with her Children.

35. On March 22, 2024, Wrangler was admitted to a court-ordered rehab facility after being jailed for violating his probation by being a felon in possession of a gun after serving time for a domestic violence charge against his current wife who was pregnant at the time he assaulted her.

36. Given the discovery by the Court that Adams had not only used her Board position to falsify Hospital records but also used them to deceive the Court as well as the negative ruling against Adams, and Rickman's legal and substance abuse issues resulting in his admission to an inpatient rehabilitation facility, it became increasingly likely and apparent to Adams that Veronica would soon be awarded custody of the Children and Adams would lose control over them.

The Plot to Harm Veronica

37. On March 23, 2024, the day after Rickman was admitted to court-ordered rehab, Adams purchased 5 stun guns at Big R store in Guymon, Oklahoma.

38. Records also reveal that Adams had bought three prepaid "burner" phones at Walmart in Guymon, Oklahoma on March 23, 2024.

39. Adams provided the phones and the stun guns to Defendants Cullum, Cole, Cora, and Grice.

40. At some point during this time period, Adams searched the internet for “taser pain level,” “burner phones,” and “gun shops” on her phone.

41. On or about March 29, 2024, Adams informed Veronica that the Children could be picked up from Adams at the Four Corners for supervised visitation the next day.

42. Despite this representation, Adams took the Children to the residence of Barret and Lacey Cook (hereinafter “the Cooks”) to stay overnight.

43. On that same date, Cora told her 16-year-old daughter that she and Cole were going on a “mission.”

44. Also, on or about March 29, 2024, Cullum used his farm equipment to do “dirt work” on a property that he and/or Cullum Farms leased from Jamie Beasley in rural Texas County, Oklahoma.

45. Upon information, the equipment was owned by Cullum and/or Cullum Farms, LLC, which business allowed and permitted Cullum to use the equipment to do the “dirt work” on the Beasley property.

46. On or about March 30, 2024, Veronica informed her family that she planned to pick up her children from Adams at Four Corners, at the intersection of Highway 95 and US 64 West, at 10:00 a.m.

47. That morning, Veronica picked up Jilian before leaving Hugoton, Kansas so that she could supervise Veronica’s visit with her Children as required by the Court.

48. At or around 9:40 a.m., Veronica and Jilian drove up to Highway 95 & Road L in Texas County where the two young mothers were to meet Adams and pick up Veronica’s Children.

49. Upon information and belief, Cole and Cora used their vehicles to block the way of Veronica and Jilian, diverting them to where Cullum and Adams were waiting to ambush them.

50. Upon information and belief, the vehicles used by Cole and Cora to block the road were owned by Cole and Cora and/or Twombly Cattle Co., which business allowed and permitted Cole and Cora to use the vehicles.

51. Upon information and belief, Cole, Cora, Cullum, and Grice used the stun guns that were purchased and provided by Adams to threaten, intimidate, and/or inflict pain on Veronica and Jilian in an effort to further the scheme to secure full custody and control of the Children by Adams.

52. At or around 10:16 a.m.-10:35 a.m. on March 30, 2024, Cullum used a vehicle that either he owned or was owned by Cullum Farms to transport Veronica and Jilian to Beasley's property where he had dug a hole - i.e. "performed dirt work." - using a skid steer and other farm equipment on Beasley's property.

53. Upon information and belief, Cole, Cora, Cullum, and Grice's use of the stun guns, burner phones, and vehicles provided by Adams lead to and directly caused or contributed to cause the deaths of Veronica and Jilian.

54. Cole, Cora, Cullum, and Grice placed Veronica and Jilian's bodies into the 10-12-foot-deep hole inside of a deep freezer that Cullum and Grice had deposited the women's bodies into. The bodies were not embalmed, cremated, or treated with any appropriate care and dignity.

55. Cullum and the others then backfilled the hole using dirt, cement, and old parts from farm equipment located on Beasley's property to cover and conceal the two mom's bloody bodies.

56. Before noon on March 30, 2024, Cole and Cora returned to their home and reported to Cora's daughter that things "did not go as planned," but that they would not have to worry about Veronica again.

57. Cole and Cora then instructed Cora's 16-year-old daughter to clean the vehicle they had used.

58. When Cora's daughter asked why Jilian was targeted, Cora and Cole responded that it was because Jilian had supported Veronica in the custody battle for the Children.

59. At or around noon on March 30, 2024, Adams picked up the Children from the home of Barret and Lacey Cook.

60. By the afternoon of March 30, 2024, Veronica's friends and family realized she had not arrived with the Children as she had told them and began to worry about her whereabouts and safety.

61. Veronica's friends and family then mobilized a search for Veronica.

62. Veronica's vehicle was found abandoned near Highway 95 and Road L south of Elkhart, KS where she and Jilian had been brutally ambushed by the Defendants.

63. Blood was discovered on and around Veronica's vehicle as well as Veronica's glasses and a broken hammer.

64. On April 13, 2024, Cole, Cora, Cullum, Grice, and Adams were arrested and charged criminally and a search warrant was executed on Beasley's property so that law enforcement could search for a possible burial site.

65. On April 14, 2024, authorities recovered Veronica and Jilian's deceased bodies from the bottom of the 10–12-foot hole filled with cement, dirt, rocks, and equipment parts.

Defendants' Associations

66. Adams, Cullum, Cora, Cole, and Grice are connected via a “cultish” and fringe group who believe their children should only be educated in their own small school.

67. Moreover, Defendants consider themselves to be “sovereign citizens” who are not subject to and do not have to obey the laws of the individual states or the United States.

68. Courts have recently explained the hallmarks of sovereign citizens. Such defendants “contend that the United States is a corporation,” believe that courts do not have jurisdiction over them, believe that “all crimes are commercial,” and that they must consent to the jurisdiction of the courts in order to be subject to them. *Serpik v. Weedon*, No. CIV-23-00988-JD, 2024 WL 556680, at *3 (W.D. Okla. Feb. 12, 2024).

69. In addition to securing complete custody of the Children for Adams, Defendants hoped to integrate and indoctrinate the Children.

70. Upon information and belief, Adams has also made attempts to ensure that none of Rickman’s assets could be obtained by Veronica via the Children.

71. Upon information and belief, in an attempt to conceal and shelter assets from Veronica, Adams transferred several assets into the Adams Girl’s Trust, Adams Family Farms, and Karat Top.

72. Upon information and belief, as part of his own recent divorce, Cullum has also attempted to move assets into Cullum Family Farms.

73. Upon information and belief, Defendants, and each of them, have moved their assets into their respective businesses and trusts in order to shield them from any judgment that Plaintiff may obtain from them.

COUNT I – ASSAULT AND BATTERY

Plaintiff v. All Defendants

74. Plaintiff incorporates the above allegations as if fully set forth herein.

75. Defendants Cora, Cole, Grice, and/or Cullum, by use of a stun gun, hammer, knives, their vehicles, farm equipment and/or their own bodies, made intentional, harmful, offensive and unlawful contact with Veronica and Jilian resulting in their death.

76. By supplying defendants with burner phones, vehicles, farm equipment, property, and stun guns and further conspiring with Cora, Cole, Grice and/or Cullum, as well as Twombly Cattle, Adams Family Farms, and Cullum Family Farms to make intentional, harmful, offensive and unlawful contact with Veronica, Defendants Adams, along with all other Defendants, aided in abetted in making unlawful and offensive contact with Veronica and Jilian resulting in her deaths.

77. As a direct and proximate result of the aforementioned intentional, harmful, offensive and unlawful acts by Defendants to Decedent Veronica's person, Plaintiff seeks recovery pursuant to 12 O.S.A. § 1053 for medical and burial expenses, mental pain and anguish suffered by Veronica, pecuniary loss, and grief and loss of companionship of her daughter and all other recoverable damages available under the law.

78. Plaintiff further claims damages under 23 O.S.A. § 9.1 because Defendants acted with reckless disregard for the rights of Veronica and said damages would serve to make an example of and punish Defendants.

WHEREFORE, for this Count I, Plaintiff respectfully requests that this Court enter judgment against Defendants in an amount that is fair and reasonable in excess of \$75,000.00 to compensate Plaintiff for the damages sustained by the death of Veronica, which includes economic and non-economic damages including but not limited to medical and burial expenses, mental pain and anguish suffered by Veronica, pecuniary loss, and grief and loss of companionship of her

daughter, any other damages available under 12 O.S.A. § 1051 *et seq.*, for pre-judgment and post-judgment interests as provided by law; for punitive damages in an amount that is fair and reasonable; for her costs in maintaining this action; and for any other Orders and/or relief which this Court deems just and proper under the circumstances.

COUNT II – FALSE IMPRISONMENT

Plaintiff v. All Defendants

79. Plaintiff incorporates the above allegations as if fully set forth herein.

80. Defendants used their vehicles to block the roadway and stop Veronica's vehicle, thereby detaining Veronica and Jilian against their wills, which ultimately lead to and resulted in the two young mothers' deaths.

81. By positioning their vehicles in such a way that blocked the public roadway Defendants unlawfully detained Veronica and Jilian.

82. Defendants, and each of them, by use of force or threatening the use of force in the form of a stun gun, hammer, or other deadly weapon or other use of physical force, wrongfully and forcefully detained Veronica and Jilian against their will, leading to and resulting in their deaths.

83. By using force or threatening the use of force to wrongfully detain and abduct Veronica and Jilian, Defendants unlawfully detained Veronica and Jilian.

84. By supplying defendants with burner phones, vehicles, farm equipment, property, and stun guns and further conspiring with Cora, Cole, Cullum, and/or and Twombly Cattle, Adams Family Farms, and Cullum Family Farms to forcefully and unlawfully detain Veronica and Jilian against their will, Defendants Adams, along with all other Defendants, aided in abetted in making unlawful and offensive contact with Veronica and Jilian resulting in her deaths.

85. As a direct and proximate result of the unwilling and unlawful detention by Defendants of Decedent Veronica Butler, Plaintiff seeks recovery pursuant to 12 O.S.A. § 1053 for medical and burial expenses, mental pain and anguish suffered by Veronica, pecuniary loss, and grief and loss of companionship of her daughter and all other recoverable damages available under the law.

86. Plaintiff further claims damages under 23 O.S.A. § 9.1 because Defendants acted with reckless disregard for the rights of Veronica and said damages would serve to make an example of and punish Defendants.

WHEREFORE, for this Count II, Plaintiff respectfully requests that this Court enter judgment against Defendants in an amount that is fair and reasonable in excess of \$75,000.00 to compensate Plaintiff for the damages sustained by the death of Veronica, which includes economic and non-economic damages including but not limited to medical and burial expenses, mental pain and anguish suffered by Veronica, pecuniary loss, and grief and loss of companionship of her daughter, any other damages available under 12 O.S.A. § 1051 *et seq.*, for pre-judgment and post-judgment interests as provided by law; for punitive damages in an amount that is fair and reasonable; for her costs in maintaining this action; and for any other Orders and/or relief which this Court deems just and proper under the circumstances.

COUNT III – NEGLIGENCE

Plaintiff v. All Defendants

87. Plaintiff incorporates the above allegations as if fully set forth herein.

88. Defendant Adams searched “taser pain level” and purchased stun guns, which she provided to the other Defendants as part of the scheme to gain full custody and control of the Children and indoctrinate them into Adams’ group known as “God’s Misfits”.

89. In keeping with this pattern and practice, Defendants' intention was to brandish their vehicles, stun guns, and/or a hammer supplied by Adams to threaten or intimidate Veronica and Jilian in relation to the custody battle with Adams and Rickman.

90. While attempting to brandish the stun guns, vehicles, and/or the hammer to threaten or intimidate Veronica and Jilian, Defendants negligently used them in such a way that the stun guns, hammers, and/or vehicles killed Veronica and Jilian.

91. Cole and Cora reported to their daughter that "things did not go as planned" with respect to Veronica and Jilian.

92. The negligent, careless, and reckless actions and/or omissions of Defendants, including Defendant Adams' pattern and practice of using threats of force to influence the outcome of the child custody dispute, directly and proximately caused and/or contributed to cause the deaths of Veronica and Jilian.

93. Defendants acted in a negligent, careless, and/or reckless manner by brandishing stun guns and/or a hammer and operating vehicles in a reckless and unlawful manner on a public road that ultimately led to the deaths of Veronica and Jilian.

94. The foregoing negligent acts were all in furtherance of the Defendants' scheme to gain full custody and control of the Children and indoctrinate them into Adams' group known as "God's Misfits".

95. As a direct and proximate result of the aforementioned negligent, careless, and reckless actions by Defendants, Plaintiff seeks recovery pursuant to 12 O.S.A. § 1053 for medical and burial expenses, mental pain and anguish suffered by Veronica, pecuniary loss, and grief and loss of companionship of her daughter and all other recoverable damages available under the law.

96. Plaintiff further claims damages under 23 O.S.A. § 9.1 because Defendants acted with reckless disregard for the rights of Veronica and said damages would serve to make an example of and punish Defendants.

WHEREFORE, for this Count III, Plaintiff respectfully requests that this Court enter judgment against Defendants in an amount that is fair and reasonable in excess of \$75,000.00 to compensate Plaintiff for the damages sustained by the death of Veronica, which includes economic and non-economic damages including but not limited to medical and burial expenses, mental pain and anguish suffered by Veronica, pecuniary loss, and grief and loss of companionship of her daughter, any other damages available under 12 O.S.A. § 1051 *et seq.* for pre-judgment and post-judgment interests as provided by law; for punitive damages in an amount that is fair and reasonable; for her costs in maintaining this action; and for any other Orders and/or relief which this Court deems just and proper under the circumstances.

COUNT IV – INTEREFENCE WITH RIGHT OF SEPULCHRE

Plaintiff v. All Defendants

97. Plaintiff incorporates the above allegations as if fully set forth herein.

98. Plaintiff is the next of kin of Veronica Butler. She is her biological mother.

99. As the next of kin to Veronica Butler, Plaintiff had a right to the deceased remains of Veronica Butler and to dispose of them as she saw fit.

100. By unlawfully taking Veronica's body and burying her ten (10) to twelve (12) feet deep so as to hide the body, Defendants interfered with Plaintiff's right to immediate possession of Veronica's body.

101. By burying Veronica deep in an undisclosed location with no casket, placing her body in a deep freezer, with no embalming, and no protection for Veronica's body, Defendants demonstrated complete a disregard for Plaintiff's rights and for the disposal of Veronica's body.

102. Given the unlawful nature under which Defendants took possession of Veronica's body, Defendants interference was unauthorized.

103. By burying Veronica's body in an undisclosed and hidden location, Defendants were aware that they were interfering with Plaintiff's right to possession of Veronica's body.

104. Due to Defendant's interference with Veronica's body and heinous and violent nature with which Defendants disposed of Veronica's body, Plaintiff has suffered mental anguish.

WHEREFORE, for this Count IV, Plaintiff respectfully requests that this Court enter judgment against Defendants in an amount that is fair and reasonable in excess of \$75,000.00 to compensate Plaintiff for the mental anguish She suffered as a result of Defendants interference with the right of sepulchre, for pre-judgment and post-judgment interests as provided by law; for punitive damages in an amount that is fair and reasonable; for their costs in maintaining this action; and for any other Orders and/or relief which this Court deems just and proper under the circumstances.

COUNT V – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:
ACCUSATIONS AGAINST VERONICA

Plaintiff v. Adams

105. Plaintiff incorporates the above allegations as if fully set forth herein.

106. In her capacity as a member of the Board of the Hospital, Adams made untrue representations that Veronica had exposed the Children to sexual assault by Veronica's brother.

107. As a result of Adam's misrepresentations, the Hospital generated records that falsely showed Veronica had exposed the children to sexual assault.

108. Adams's representations were later restated and published in court.

109. By Adams's misconduct in furtherance of Defendants' scheme to gain control of and indoctrinate the Children into Adams' group known as "God's Misfits", she inflicted severe emotional distress on Veronica resulting in mental anguish.

110. As a direct and proximate result of the aforementioned intentional infliction of emotional distress perpetrated by Defendants, Plaintiff seeks recovery pursuant to 12 O.S.A. § 1053 for mental pain and anguish suffered by Veronica and pecuniary loss.

111. Plaintiff further claims damages under 23 O.S.A. § 9.1 because Defendants acted with reckless disregard for the rights of Veronica and said damages would serve to make an example of and punish Defendants.

WHEREFORE, for this Count V, Plaintiff respectfully requests that this Court enter judgment against Defendants in an amount that is fair and reasonable in excess of \$75,000.00 to compensate Plaintiff for the damages sustained by the death of Veronica, which includes economic and non-economic damages including but not limited to medical and burial expenses, mental pain and anguish suffered by Veronica, pecuniary loss, and grief and loss of companionship of her daughter, for pre-judgment and post-judgment interests as provided by law; for punitive damages in an amount that is fair and reasonable; for her costs in maintaining this action; and for any other Orders and/or relief which this Court deems just and proper under the circumstances.

COUNT VI – INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS:
VERONICA'S ABDUCTION

Plaintiff v. All Defendants

112. Plaintiff incorporates the above allegations as if fully set forth herein.

113. At Adams's behest, Defendants brandished stun guns and/or hammers and/or other weapons at Veronica and Jilian for the purpose of intimidating them with respect to the custody dispute over the children.

114. By their conduct, Defendants caused severe emotional distress to Veronica and Jilian and caused them bodily harm resulting in their deaths.

115. As a direct and proximate result of the aforementioned intentional infliction of emotional distress perpetrated by Defendants as part of their scheme to take control of the Children and indoctrinate them into Adams' group known as "God's Misfits", Plaintiff seeks recovery pursuant to 12 O.S.A. § 1053 for medical and burial expenses, mental pain and anguish suffered by Veronica, pecuniary loss, and grief and loss of companionship of her daughter.

116. Plaintiff further claims damages under 23 O.S.A. § 9.1 because Defendants acted with reckless disregard for the rights of Veronica and said damages would serve to make an example of and punish Defendants.

WHEREFORE, for this Count VI, Plaintiff respectfully requests that this Court enter judgment against Defendants in an amount that is fair and reasonable in excess of \$75,000.00 to compensate Plaintiff for the damages sustained by the death of Veronica, which includes economic and non-economic damages including but not limited to medical and burial expenses, mental pain and anguish suffered by Veronica, pecuniary loss, and grief and loss of companionship of his daughter, for pre-judgment and post-judgment interests as provided by law; for punitive damages in an amount that is fair and reasonable; for their costs in maintaining this action; and for any other Orders and/or relief which this Court deems just and proper under the circumstances.

COUNT VII – OKLAHOMA UNIFORM FRAUDULENT TRANSFERS ACT
(Pursuant to O.S.A. §112., et seq., and common law)

Plaintiff v. All Defendants

117. Plaintiff incorporates the above allegations as if fully set forth herein.

118. Defendants fraudulently concealed, transferred and/or received assets with the intent to hinder, delay, and defraud existing and future creditors. These creditors included the Plaintiff who would take by and through Decedent in relation to this and any future claim arising out of Defendants' threats, intimidation of the Decedent, negligent and reckless conduct, which was all part of a scheme to gain full custody of the Children and indoctrinate them, ultimately resulted in Decedent's wrongful death.

119. All Defendants participated, and continue to participate, by a meeting of the minds and by their conduct, in a civil conspiracy the purpose of which is to fraudulently conceal and/or convey assets, including personal, corporate and trust assets, to make Defendants judgment proof from the claims of creditors, including Decedent and the Plaintiffs, among others.

120. As participants in a civil conspiracy and/or joint venture, all Defendants are jointly and severally liable for any judgment rendered.

121. All Defendants knew, or should have known, and/or participated in and consented to the fraudulent transfer of assets in violation of O.S.A. §§116, 117 and other provisions of the Oklahoma Uniform Fraudulent Transfers Act ("OUFTA").

122. The transfers were made with actual intent to hinder, delay, or defraud existing and future creditors as described above.

123. Upon information and belief, the transfers were made to insiders and close family members.

124. None of the transfers were made in relation to a legitimate business deal, or constituted a transaction in which Defendants received a reasonably equivalent value in exchange for the transfer or obligation.

125. Defendants intended to incur, or believed or reasonably should have believed that they would incur, debts beyond their ability to pay as they became due after the fraudulent transfers were made and/or became insolvent.

126. Plaintiffs are entitled to this Court's Order and Judgment voiding and/or setting aside all of the transfers identified above, and any others revealed in discovery, to the extent necessary to satisfy Plaintiffs' claims.

127. As set forth above, Defendants consider themselves to be "sovereign citizens" and members of the anti-government religious group.

128. As such, Defendants do not recognize the authority of this or any other court in the United States.

129. Upon information and belief, Defendants each have transferred, attempted to transfer, or intend to transfer their assets to avoid being subject to any judgment handed down by this Court with respect to Plaintiffs claims against them, which Defendants believe to be illegitimate.

130. Given the likelihood that Defendants have already and will continue to transfer their assets in an attempt to avoid any judgment handed down by this Court in favor of Plaintiff, Plaintiff requests that an injunction against further disposition by the Defendants be entered and, more importantly, that a receiver be appointed to take charge of and manage Defendants' assets pursuant to O.S.A. §119, and other provisions of the OUFTA, O.S.A §1551, et seq. (Oklahoma Receivership Act), and other applicable law until such time as this matter is resolved.

131. More specifically, Plaintiff requests that a Receiver be appointed to take charge and manage Defendants' assets, including bank accounts, the Trust, and any real property owned or

managed by any of the Defendants, and any other relief needed that becomes apparent through discovery or otherwise.

132. Appointment of a Receiver to take charge and manage Defendants' assets and entry of an order enjoining Defendants from any further transfers and/or from conducting their businesses is warranted and proper in this case pursuant to:

- a. O.S.A. §119 (in an action for relief under OUFTA, the Court in its discretion may appoint "a receiver to take charge of the asset transferred or of other property of the transferee," may enter "an injunction against further disposition by the debtor or transferee, or both, of the asset transferred or of other property," and may fashion "any other relief the circumstances may require"); and
- b. O.S.A. §1551 and other provisions of the Oklahoma Receivership Act (it is proper to appoint a Receiver to protect, keep and preserve money and property "on the application of the plaintiff, or of any party whose right to or interest in the property or fund...is probable, and where it is shown the property or fund is in danger of being lost, removed or materially injured").

133. The facts and circumstances herein alleged, and/or that have already been demonstrated to the Court, warrant appointment of a Receiver, and further show the existence of conduct on the part of Defendants which constitutes a great emergency or exigency that requires a Receiver to immediately and aggressively take charge of, manage, preserve, and protect Defendants' assets until this litigation resolves who is entitled to them.

134. Plaintiffs are also entitled to an award of their attorneys' fees in addition to the other damages awarded herein under the "special circumstances" exception to the "American Rule"

because Defendants, and each of them, have engaged in intentional conduct in relation to the fraudulent concealment and/or transfers of assets.

WHEREFORE, for this Count VII, Plaintiffs respectfully request that this Court enter an injunction against further disposition by Defendants of their property and assets; enter a judgment against Defendants voiding and setting aside all fraudulent transfers of assets identified herein, and those further revealed and identified in discovery and/or at trial; finding that all assets of the Defendants are available to the extent necessary to satisfy Plaintiffs' claims for the wrongful death of Decedent; awarding damages in the amount to be shown by the evidence at trial; awarding punitive damages; awarding Plaintiff her attorneys' fees in addition to all other damages; appointing a receiver, or other appropriate representative to control, manage, and protect Defendants' assets; finding that all Defendants as participants in a civil conspiracy and/or joint venture are jointly and severally liable for any judgment rendered; and for any other Orders and/or relief which this Court deems just and proper under the circumstances.

COUNT VIII – NEGLIGENT ENTRUSTMENT OF CHATTELS

*Plaintiff v. Adams, Twombly Cattle, Adams Family Farms, and Cullum Family Farms,
Karat Top*

135. Plaintiff incorporates the above allegations as if fully set forth herein.

136. Adams, Cullum Farms, Karat Top, Twombly Cattle and/or Adams Family Farms provided Cole, Cora, and Cullum, with stun guns, vehicles, farm equipment, burner phones, and other items for the purpose of threatening, intimidating, or scaring Veronica and Jilian with respect to the child custody dispute.

137. Adams, Cullum Farms, Karat Top, Twombly Cattle and/or Adams Family Farms had reason to know that because of Cole, Cora, Grice, and Cullum's violent and unpredictable

nature, they would use the stun guns, vehicles, farm equipment, burner phones, and other items in a manner involving unreasonable risk of physical harm to others.

138. Adams, Cullum Farms, Karat Top, Twombly Cattle and/or Adams Family Farms had every reason to believe that Veronica and Jilian would be harmed by Cole, Cora, and Cullum's use of the stun guns, vehicles, farm equipment, burner phones, and other items.

139. Veronica and Jilian were harmed by Cole, Cora, Grice, and Cullum's use of the stun guns supplied by Adams, which lead to or resulted in their deaths.

140. As a direct and proximate result of Adams', Cullum Farms, Karat Top, Twombly Cattle and/or Adams Family Farms' negligent entrustment of the stun guns, vehicles, farm equipment, burner phones, and other items to Cole, Cora, Grice, and Cullum's, Plaintiff seeks recovery pursuant to 12 O.S.A. § 1053 for medical and burial expenses, mental pain and anguish suffered by Veronica, pecuniary loss, grief and loss of companionship of her daughter, and all other damages available under the law.

141. Plaintiff further claims damages under 23 O.S.A. § 9.1 because Defendants acted with reckless disregard for the rights of Veronica and said damages would serve to make an example of and punish Defendants.

WHEREFORE, for this Count VIII, Plaintiff respectfully requests that this Court enter judgment against Defendants in an amount that is fair and reasonable in excess of \$75,000.00 to compensate Plaintiff for the damages sustained by the death of Veronica, which includes economic and non-economic damages including but not limited to medical and burial expenses, mental pain and anguish suffered by Veronica, pecuniary loss, and grief and loss of companionship of his daughter, any other damages available under 12 O.S.A. § 1051 *et seq.*, for pre-judgment and post-judgment interests as provided by law; for punitive damages in an amount that is fair and

reasonable; for their costs in maintaining this action; and for any other Orders and/or relief which this Court deems just and proper under the circumstances.

COUNT IX – JOINT VENTURE

Plaintiff v. All Defendants

142. Plaintiff incorporates the above paragraphs as if fully set forth herein.

143. Based on the allegations outlined above, Defendants had an express or implied agreement to threaten, intimidate, harm, or kill Veronica and Jilian and for the common purpose of depriving Veronica of custody of the Children and incorporate and indoctrinate the Children.

144. Defendants had a community of interests in harming Veronica and depriving Veronica of custody of the Children.

145. Each defendant had an equal right to a voice in the direction of the plot to deprive Veronica of custody of the Children giving each defendant an equal right of control including control over operation of the vehicles, use of the stun guns, burner phones, farm equipment, and real property, the use of which resulted in the deaths of Veronica and Jilian.

146. Because Defendants engaged in a joint venture to capture, harm, and/or kill Veronica and to deprive Veronica of custody of the Children, each Defendant is equally liable for the actions of each co-Defendant.

WHEREFORE, for this Count IX, Plaintiff respectfully requests that this Court enter judgment against Defendants in an amount that is fair and reasonable in excess of \$75,000.00 to compensate Plaintiff for the damages sustained by the death of Veronica, which includes economic and non-economic damages including but not limited to medical and burial expenses, mental pain and anguish suffered by Veronica, pecuniary loss, and grief and loss of companionship of his daughter, any other damages available under 12 O.S.A. § 1051 *et seq.*, for pre-judgment and post-

judgment interests as provided by law; for punitive damages in an amount that is fair and reasonable; for their costs in maintaining this action; and for any other Orders and/or relief which this Court deems just and proper under the circumstances.

COUNT X – CHILD STEALING: 43 O.S.A. § 111.2

Plaintiff v. Cole and Cora Twombly, Paul Grice, and Tad Cullum

147. Plaintiff incorporates the above allegations as if fully set forth herein.

148. Defendants Cole, Cora, Grice, and Cullum are not parties to the child custody dispute over the Children.

149. By engaging in the plot to deprive Veronica of her visitation rights, Cole, Cora, Grice, and Cullum assisted in and/or caused the removal and detention of the Children with the intent to deny Veronica her visitation rights under the court order granting Veronica supervised custody of the Children.

WHEREFORE, for this Count X, Plaintiff respectfully requests that this Court enter judgment against Defendants for loss of society and companionship, compensatory damages that Plaintiff will incur in searching for the Children or attending court hearing, reasonable attorney fees, any other remedies available by law or equity, and any other Orders and/or relief which this Court deems just and proper under the circumstances.

COUNT XI – INTERFERENCE WITH PERSONAL RELATIONS: 76 O.S.A. § 8

Plaintiff v. All Defendants

150. Plaintiff incorporates the above allegations as if fully set forth herein.

151. On March 30, 2024, Adams informed Veronica that the Children would be at Four Corners for Veronica to pick up.

152. Despite what Adams told Veronica, Adams abducted the Children and left them at the Cook's residence.

153. By taking the Children to the Cook's residence instead of leaving them at Adams's residence where she could pick them up Adams abducted the Children from their mother, who was entitled to custody of the Children.

154. Defendants' abduction of Veronica from her Children in an attempt to intimidate or threaten Veronica, which ultimately lead to the deaths of the two moms were for the purposes of interfering with the relationship between Veronica and her Children in order to secure complete control of the Children and incorporate and indoctrinate the Children.

WHEREFORE, for this Count XI, Plaintiff respectfully requests that this Court enter judgment against Defendants for nominal damages, loss of society and companionship, compensatory damages that Plaintiff will incur in searching for the Children or attending court hearing, reasonable attorney fees, any other remedies available by law or equity, and any other Orders and/or relief which this Court deems just and proper under the circumstances.

COUNT XII – DEFAMATION

Plaintiff v. Adams

155. Plaintiff incorporates the above allegations as if fully set forth herein.

156. Veronica Butler was a private figure.

157. Upon information and belief, Adams, in her capacity as a member of the Board of the Hospital, stated to members of the Board, to Hospital personnel, and others that Veronica had repeatedly exposed the Children to sexual assault at the hands of her brother.

158. Those statements were false.

159. When making the false and defamatory statement that Veronica exposed the Children to sexual assault at the hands of her brother without a basis in truth, Adams was negligent in making the statement.

160. Alternatively, Adams made the statement with a reckless disregard for the truth or with knowledge of its untruth.

161. Adams's false and defamatory statement provided grounds for Veronica to lose custody of the Children.

162. As a result of making the false and defamatory statement to the Hospital Board, Hospital Personnel, and others, Veronica was wrongfully deprived of custody of the Children.

163. Additionally, Veronica suffered emotional distress as a result of the publication Adams's defamatory statement.

WHEREFORE, on this Count XII Plaintiff respectfully requests that this Court enter judgment against Defendants in an amount that is fair and reasonable in excess of \$75,000.00 to compensate Plaintiff for the damages sustained by Veronica Butler which includes economic and non-economic damages including but not limited to mental pain and anguish suffered by Veronica, pecuniary loss, for pre-judgment and post-judgment interests as provided by law; for punitive damages in an amount that is fair and reasonable; for their costs in maintaining this action; and for any other Orders and/or relief which this Court deems just and proper under the circumstances.

COUNT XIII – CIVIL CONSPIRACY

Plaintiff v. All Defendants

164. Plaintiff incorporates the above allegations as if fully set forth herein.

165. Defendants, jointly conspired to unlawfully kill, threaten, intimidate, or otherwise harm Veronica and Jilian.

166. To accomplish these unlawful ends, Defendants jointly conspired to do the unlawful acts of assault, battery, false imprisonment, negligence, negligent entrustment, improperly interfering with Plaintiff's right to Veronica's deceased body, infliction of emotional distress on Veronica, and/or interfere with Veronica's right to supervised visitation under a court order, and defame Veronica, all as set forth above and incorporated herein.

167. Defendants' conspiracy to accomplish the above unlawful ends by the above unlawful means proximately caused the deaths of Veronica and Jilian.

WHEREFORE, for this Count XIII, Plaintiff respectfully requests that this Court enter judgment against Defendants in an amount that is fair and reasonable in excess of \$75,000.00 to compensate Plaintiff for the damages sustained by the death of Veronica, which includes economic and non-economic damages including but not limited to medical and burial expenses, mental pain and anguish suffered by Veronica, pecuniary loss, and grief and loss of companionship of his daughter, any other damages available under 12 O.S.A. § 1051 *et seq.*, for pre-judgment and post-judgment interests as provided by law; for punitive damages in an amount that is fair and reasonable; for their costs in maintaining this action; and for any other Orders and/or relief which this Court deems just and proper under the circumstances.

Respectfully submitted,

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