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60CV-20-3150 C06D05 : 126 Pages

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS DIVISION

| STATE OF ARKANSA | AS, $ex rel$. |
|------------------|------------------|
| LESLIE RUTLEDGE, | ATTORNEY GENERAL |

PLAINTIFF

v. CASE NO. _____

LAURA ANNE JONES and PURPLE HAT CONSTRUCTION, LLC

DEFENDANTS

COMPLAINT

The State of Arkansas, *ex rel*. Leslie Rutledge, Attorney General ("the State"), for its Complaint against Laura Anne Jones and Purple Hat Construction, LLC ("Defendants"), states:

I. INTRODUCTION

- 1. This is a consumer protection action brought to redress and restrain violations of the Arkansas Deceptive Trade Practices Act, Ark. Code Ann. § 4-88-101 through 115 ("ADTPA").
- 2. Laura Anne Jones ("Jones"), through her business Purple Hat Construction, LLC ("Purple Hat"), engaged in home improvement work in Northwest Arkansas. Unbeknownst to consumers who hired her, Jones was not a licensed contractor. Defendants kept consumers' payments without performing the work in violation of the ADTPA.

3. The State seeks restitution for affected consumers, an order imposing civil penalties, costs, and other injunctive relief against Defendants.

II.PARTIES

- 4. Plaintiff is the State of Arkansas, *ex rel*. Leslie Rutledge, Attorney General. Attorney General Rutledge is the chief legal officer of the State. Pursuant to Ark. Code Ann. § 4-88-104, 4-88-113, and 4-89-106, the State may seek civil enforcement of the ADTPA.
 - 5. Defendant Jones is a resident of Alma, Arkansas.
- 6. Defendant Purple Hat is an Arkansas limited liability company organized on November 28, 2018, and operated by Defendant Jones to conduct a home improvement business in multiple Arkansas counties, including Washington, Benton, and others. Its registered agent for service of process is Laura Anne Jones, 228 East Walnut Street, Alma, Arkansas 72921.

III. JURISDICTION

- 7. This Court has jurisdiction over this matter pursuant to Ark. Code Ann. § 4-88-104 and the common law of the State of Arkansas.
- 8. This Court has jurisdiction over Defendants Jones and Purple Hat pursuant to Ark. Code Ann. § 16-4-101. At all times relevant to this lawsuit, Defendants systematically and continuously conducted business in the State of Arkansas and availed themselves of the privilege of conducting business activities within the State of Arkansas.

9. Venue is proper pursuant to Ark. Code Ann. §§ 4-88-104, 4-88-112, and the common law of the State of Arkansas.

IV. FACTUAL ALLEGATIONS

- 10. Defendant Jones was a member of Lee Daily Construction, LLC ("LDC"), from August 15, 2003, until approximately May 25, 2011.
- 11. Upon information and belief, Defendant Jones acquired some knowledge about home improvement and construction during her tenure at LDC.
- 12. Defendant Jones filed articles of organization for Purple Hat on November 28, 2018.
- 13. Defendant Jones is not licensed by the Arkansas Contractor's Licensing Board.¹
- 14. Purple Hat maintained a Facebook profile at https://www.facebook.com/purplehatconstruction with photographs of residential projects along with contact information.
- 15. On August 26, 2019, Defendants began advertising a \$1,999 "special" for the business' Facebook followers.² This "special" offered bundled home improvement projects for a flat fee. The specific projects bundled together changed periodically.
- 16. On January 30, 2020, Defendant Jones posted on the Purple Hat Facebook page:

"Purple Hat Construction LLC is completely booked out on kitchen cabinet makeovers for months thanks in part to all the friend referrals from our

¹ Ark. Code Ann. § 17-25-101 *et seq.* (Contractor licensing legal requirements, board enforcement authority, and penalty provisions).

² See the August 26, 2019, Facebook post, which is attached as Exhibit A.

kitchen clients and our amazing followers.... We get tons of bid messages and although it's a good thing and we welcome them, we want to let all of our followers know that we are all booked up on kitchen cabinet makeovers because we don't want to waste anyone's time in messenger. We will repost once we get all the Spring kitchen cabinet bookings and the late Spring waiting list of those wanting us to officially schedule them, as well, done. At our clients' requests who now need more projects done, we hope to take on some small \$1999 and below cosmetic bath remodels next, so will be posting some bath specials over the coming weeks for late Spring and Summer Bath bookings (Was hoping to dive into baths first thing 2020, but had too many needing kitchens done first). As always... Thanks for all the support.... it's hard to believe January 2020 went by so fast!!!"³

- 17. While Defendant Jones' Facebook post thanking her followers for the support seems to indicate successful business growth in 2019, consumer complaints made to the Attorney General's Office for Defendants' actions during 2019 tells a much different story.
- 18. On April 11, 2019, Consumer Melissa Hendricks hired Defendants to paint her kitchen cabinets at their home in Gravette. The parties agreed on a price of \$2,749.00 for the project.⁴ To secure an installation appointment, Ms. Hendricks wrote a check for \$1,374.50, which was one-half off the total estimate.⁵ Defendant Jones told Ms. Hendricks that she had blocked of the week of May 6, 2019, for her kitchen project.⁶

³ See the January 30, 2020, Facebook post, which is attached as Exhibit B.

 $^{^4}$ See the text messages between Melissa Hendricks and Defendant Jones, which are attached as Exhibit C.

⁵ See a copy of the Hendricks check to Defendants, which is attached as Exhibit D.

⁶ Hendricks text messages, supra, note 4.

19. Defendants worked during the week of May 6, but indicated to the Ms. Hendricks that they would be back on Saturday, May 11, 2019.⁷ By noon on Saturday, Ms. Hendricks reached out to Defendant Jones because no one had shown up to work.⁸ Defendant Jones told her she could finish the next Monday or Tuesday because she was short-handed due to having a "few sick workers".⁹

20. Later that weekend, Ms. Hendricks and Defendant Jones spoke by telephone. Defendant Jones responded to that call by sending Ms. Hendricks a text stating, "...I just don't think we are a good fit for your kitchen. I don't feel comfortable and discussed w [sic] my team and neither do they at this point. I can have primed doors dropped off in the evening when you are home from work and can mail u [sic] your deposit back..." 10

- 21. Instead of mailing Ms. Hendricks the refund for the deposit, Defendant Jones texted that she "tried everything to get u [sic] your money sooner even tried to pawn my car...to help u [sic] out...was offered \$150".¹¹
- 22. Defendant Jones followed up with a text stating, "We get very uncomfortable when we get questioned about our integrity? [sic] And we don't like

 $^{^7}$ Id.

 $^{^{8}}$ Id.

⁹ *Id*.

 $^{^{10}}$ *Id*.

¹¹ *Id*.

communication with one of the parties being severed...Why would I want to put me or my workers in a home where we are questioned if we are gonna [sic] be crooks?"12

- 23. In the same text, Defendant Jones stated that "...Construction and life are unpredictable. Had a suicidal son and a father who got rushed into emergency surgery...U [sic] can have doors back at anytime [sic] Deposit will be given back when funds are available".¹³
- 24. Despite receiving repeated promises from Defendant Jones to complete the project, then later to send a refund, Ms. Hendricks has neither received the promised work nor a refund.
- 25. Consumer Cathy Smith hired Defendant Jones to paint some cabinets, a kitchen island, and a fireplace at her home in Bentonville. Defendant Jones and Ms. C. Smith agreed on a price of \$3,363.00 for the project, with \$999.50¹⁴ due to "hold a spot" on May 2, 2019.¹⁵
- 26. On May 30, 2019, Ms. C. Smith paid Defendant Jones a second upfront payment of \$2,363.00.\(^{16}\) Defendant Jones agreed to have the project completed in two weeks.\(^{17}\)

 13 *Id*.

¹⁴ See a copy of the PayPal transaction receipt, which is attached as Exhibit E.

 15 See the text messages between Cathy Smith and Defendant Jones, which are attached as Exhibit F.

¹⁶ See a copy of the check, which is attached as Exhibit G.

¹⁷ C. Smith text messages, *supra*, note 15.

 $^{^{12}}$ *Id*.

- 27. Defendant Jones provided many excuses during the weeks that followed as to why the project could not be completed on time. Defendant Jones blamed her delays on a flat tire, sickness, moving, lack of transportation, and other projects.
- 28. In a six-week period at the Smith residence, Defendant Jones taped off areas for painting, sanded some of the cabinets, and stained some of the cabinets. Nothing was painted as promised.¹⁸
- 29. In the days that followed, despite receiving repeated promises from Defendant Jones to complete the work, Ms. C. Smith has neither received the promised work nor a refund.
- 30. On or about August 19, 2019, Consumer Devin Cohee hired Defendants to paint at her home in Cave Springs. 19 Ms. Cohee sent \$100.00 to Defendant Jones' PayPal account as a down payment. 20
- 31. When the project was not completed in a reasonable time, Ms. Cohee began pressing Defendant Jones to complete the painting and asked for the project timeline. Defendant Jones refused to provide a timeline but agreed to provide Ms. Cohee with a refund.²¹
- 32. After two weeks, Ms. Cohee still did not have a refund from Defendants, so she opened a dispute with PayPal and recovered the funds.

 $^{\rm 19}$ See the consumer complaint filed by Devin Cohee, which are attached as Exhibit H.

 $^{^{18}}$ *Id*.

²⁰ See a copy of the PayPal transaction receipt, which is attached as Exhibit I.

²¹ Cohee complaint, *supra*, note 19.

- 33. Consumer Laurie Smith contacted Defendant Jones in response to Defendants' advertisements about painting cabinets in campers. On July 25, 2019, Ms. L. Smith paid Defendant Jones \$299.00 via PayPal to complete the job.²²
- 34. On September 18, 2019, Defendant Jones texted Ms. L. Smith and indicated that she had some "horrible stuff happen" with her business and that she was not able to provide the service for Ms. L. Smith's camper on the timeline previously discussed.²³
- 35. Ms. L. Smith immediately requested a refund, but Defendant Jones stated that she did not have the money.²⁴
- 36. Despite receiving promises from Defendant Jones to begin the work, Ms.

 L. Smith has neither received the promised work nor a refund.
- 37. Also in September 2019, Defendant Jones entered into an agreement with Consumer Marva Gaye Smallwood to paint a bathroom in her Rogers home. The agreed upon total price for the project was \$1,137.00.²⁵
- 38. After Ms. Smallwood paid Defendant Jones \$568.50, one-half of the total due, Defendants worked for two hours on one day. Then, Defendant Jones began making excuses to Ms. Smallwood as to why Defendants could not return to finish

²² See the consumer complaint filed by Laurie Smith, which is attached as Exhibit J.

 $^{^{23}}$ See the text messages between Laurie Smith and Defendant Jones, which are attached as Exhibit K.

 $^{^{24}}$ *Id*.

 $^{^{25}}$ See the text messages between Marva Gaye Smallwood and Defendant Jones, which are attached as Exhibit L.

the job.²⁶ Ultimately, Defendant Jones admitted to Ms. Smallwood that they could not finish the project and that she had "less than \$75 to [her] name".²⁷

- 39. Despite receiving promises from Defendant Jones to send a refund or make payments toward a refund, Ms. Smallwood has neither received the promised work nor a refund.
- 40. Consumer Rachel Stamps contacted Defendants on December 3, 2019, to inquire about the \$1,999 kitchen, dining, and living room paint makeover she had seen on Defendants' Facebook page. Defendant Jones agreed to do the job for \$1,999, as long as Ms. Stamps purchased cabinet knobs and tile with a mesh backing. The parties agreed that Ms. Stamps would pay half of the total amount due to book the installation and would pay the remaining balance when the job was complete. Defendant Jones agreed to start the job on January 13, 2020.²⁸
- 41. Defendant Jones directed that Ms. Stamps pay Defendants using Venmo, but Ms. Stamps wrote a check²⁹ to Defendant Purple Hat.
- 42. Defendant Jones accepted \$1,000.00 from Ms. Stamps as a down payment to repaint the kitchen cabinets and island, install a backsplash, white wash both sides of a fireplace, and install shiplap to the Stamps' home in Alma.

 27 *Id*.

 $^{^{26}}$ *Id*.

²¹ Ia.

²⁸ See the text messages between Rachel Stamps and Defendant Jones, which are attached as Exhibit M.

²⁹ See a copy of the Stamps check, which is attached as Exhibit N.

- 43. Defendant Jones later told Ms. Stamps that the business was shorthanded due to the holidays. They ultimately agreed that Defendant Jones would begin the job on January 16, 2020.³⁰
- 44. On January 16, 2020, Defendant Jones sent a message to Ms. Stamps, stating "My car is dying for some reason...I'm going to have to check it out tomorrow. Plus I found out I have move all of a sudden bc [sic] my landlord needs to sell asap...so trying to get my stuff still loaded up...I can easily get [kitchen cabinet doors] when I come on [January 23] and start base...that way I'm not moving doors twice."³¹
- 45. When Ms. Stamps pressed Defendant Jones to complete the job as agreed or refund the down payment, Defendant Jones refused to refund any of the \$1,000 down payment.
- 46. Defendant Jones admitted to the Attorney General's Office that she had a "drunk breakdown and clearly sent drunk messages" to Ms. Stamps.³²
- 47. Despite receiving promises from Defendant Jones to begin the work, Ms. Stamps has neither received the promised work nor a refund.
- 48. On December 4, 2019, Consumer Judith Mendez hired Defendants to paint her kitchen cabinets and walls at her home in Bentonville and paid Defendants a deposit in the amount of \$1,400.00.³³

 $^{\rm 32}$ See the email from Defendant Jones to Investigator Melissa Gladden, which is attached as Exhibit O.

 $^{^{30}}$ Stamps texts, supra, note 28.

 $^{^{31}}$ *Id*.

³³ See a copy of the Mendez Venmo transaction, which is attached as Exhibit P.

- 49. Defendant Jones pushed the start date of the Mendez project back twice, then offered a refund to Ms. Mendez. Ms. Mendez agreed to accept the refund.³⁴
- 50. Defendant Jones claims that she attempted to refund Ms. Mendez the \$1,400.00 via Venmo, but the transaction has yet to go through.³⁵
- 51. Despite receiving repeated promises from Defendant Jones to complete the project, then later to send a refund, Ms. Mendez has neither received the promised work nor a refund.

V. VIOLATIONS OF LAW

- 52. The ADTPA sets forth the State's statutory program prohibiting deceptive and unconscionable trade practices.³⁶
- 53. The business practices of Defendants constitute the sale of "goods" or "services."³⁷
 - 54. The same business practices constitute business, commerce, or trade.³⁸
- 55. It is unlawful to "knowingly make a false representation as to the characteristics, ingredients, uses, benefits, alterations, source, approval, or certification of goods or services." 39

³⁶ Ark. Code Ann. §§ 4-88-101, et seq.

 $^{^{34}}$ See the text messages between Judith Mendez and Defendant Jones, which are attached as Exhibit Q.

³⁵ *Id*.

³⁷ Ark. Code Ann. § 4-88-102(4) and (7).

³⁸ Ark. Code Ann. § 4-88-107.

³⁹ Ark. Code Ann. § 4-88-107(a)(1).

- 56. Defendants have engaged in prohibited conduct by making false representations that:
 - a. Defendant Jones was legally authorized to perform the work advertised on Facebook; and,
 - b. Defendant Jones was legally authorized to perform the work proposed to consumers in response to a request for a quote.
- 57. Defendants have engaged in the unconscionable, false, or deceptive acts or practices in business, commerce, or trade in violation of the ADTPA.⁴⁰
- 58. It is unconscionable, false, or deceptive to accept payments to perform work without performing the work or refunding consumers' payments.
- 59. It is unconscionable, false, or deceptive to accept payments to perform work and then only perform minimal work without refunding consumers' payments.
- 60. It is unconscionable, false, or deceptive to advertise home improvement services without having been issued the required licenses to perform the work advertised.
- 61. It is unconscionable, false, or deceptive to offer to perform home improvement work that requires a residential contractor's license without having a license.

⁴⁰ Ark. Code Ann. § 4-88-107(a)(10).

- 62. Defendants, in connection with the sale and advertisement of home improvement services, engaged in the act, use, or employment of deception, fraud, or false pretenses in violation of the ADTPA.⁴¹
- 63. Defendant Jones used deception, fraud, or false pretenses when she told consumers, both orally and in text messages, she could and would perform services that required a residential contractor's license, but then never performed the work or only minimally performed the work.
- 64. Defendants used deception, fraud or false pretenses when they took consumers' money to perform home improvement services requiring a contractor's license even though they were not properly licensed.
- 65. Defendants, in connection with the sale and advertisement of home improvement services, utilized concealment, suppression, or omission of material facts with the intent that others rely upon the concealment, suppression, or omission, in violation of the ADTPA.⁴²
- 66. Defendants, with the intent that consumers rely upon them, concealed, suppressed, or omitted to tell consumers that Defendant Jones was not licensed to perform the work advertised or proposed.

⁴¹ Ark. Code Ann. § 4-88-108(1).

⁴² Ark. Code Ann. § 4-88-108(2).

VI. PRAYER FOR RELIEF

- 67. The Attorney General may bring a civil action to seek to prevent persons from engaging in the use or employment of prohibited practices under the ADTPA.⁴³
- 68. Likewise, the Attorney General may bring a civil action to seek to restore to any purchaser who has suffered any ascertainable loss by reason of the use or employment of the prohibited practices any moneys or real or personal property which may have been acquired by means of any practices declared to be unlawful, together with other damages sustained.⁴⁴
- 69. The Attorney General may seek an injunction prohibiting any person from engaging in any deceptive or unlawful practice.⁴⁵
- 70. Any person who violates the provisions of the ADTPA may be assessed a civil penalty of up to \$10,000 per violation.⁴⁶
- 71. In addition, any person who violates the provisions of the ADTPA shall be liable to the Office of the Attorney General for all costs and fees, including but not limited to, expert witness fees and attorney's fees, incurred by the Office of the Attorney General in the prosecution of such actions.⁴⁷

⁴³ Ark. Code Ann. §§ 4-88-113(a).

⁴⁴ Ark. Code Ann. § 4-88-113(a)(2)(A).

⁴⁵ Ark. Code Ann. §§ 4-88-104 and 4-88-113(a)(1).

⁴⁶ Ark. Code Ann. § 4-88-113(a)(3).

⁴⁷ Ark. Code Ann. § 4-88-113(e).

- 72. A "person" is an individual, organization, group, association, partnership, corporation, or any combination thereof.⁴⁸
- 73. Defendants Jones and Purple Hat are each a "person" who has engaged in an unconscionable, false, or deceptive act or practice in business, commerce, or trade.
- 74. Defendants are jointly and severally for any penalties assessed and any monetary judgments awarded.⁴⁹
 - 75. The State will exercise its right to a trial by jury.

WHEREFORE, the above premises considered, the State of Arkansas, ex rel.

Leslie Rutledge, Attorney General, respectfully requests that this Court:

- a. Issue such orders, pursuant to Ark. Code Ann. §§ 4-88-104 and 4-88-113(a)(1), as may be necessary to prevent the use or employment by the Defendant of the practices described herein which are violations of the ADTPA;
- b. Issue a permanent injunction prohibiting Defendants from advertising or soliciting home improvement services in Arkansas;
- c. Order the suspension or forfeiture of Defendants' corporate charters, licenses, or permits or authorization to do business in this state;
- d. Issue an order, pursuant to Ark. Code Ann. § 4-88-113(a)(2)(A), requiring

 Defendants to pay restitution to those Arkansas consumers affected by the

⁴⁸ Ark. Code Ann. § 4-88-102(5).

⁴⁹ Ark. Code Ann. § 4-88-113(d)(1).

activities outlined herein; in addition, or in the alternative, enter an order requiring Defendants to remit to affected consumers all sums obtained from Arkansas consumers by methods prohibited by Arkansas law;

- e. Impose civil penalties pursuant to Ark. Code Ann. § 4-88-113(b), to be paid to the State by the Defendants in the amount of \$10,000.00 per each violation of the ADTPA proved at a trial of this matter, the full amount of which will exceed the amount necessary to establish federal diversity jurisdiction;
- f. Issue an order, pursuant to Ark. Code Ann. § 4-88-113(e), requiring Defendants to pay the State's costs in this investigation and litigation, including, but not limited to, attorneys' fees and costs; and
- g. For all other just and proper relief to which the State may be entitled.

Respectfully submitted,

LESLIE RUTLEDGE ATTORNEY GENERAL

- Share H. D.

Shannon Halijan, Ark. Bar Vo. 2005136

Assistant Attorney General

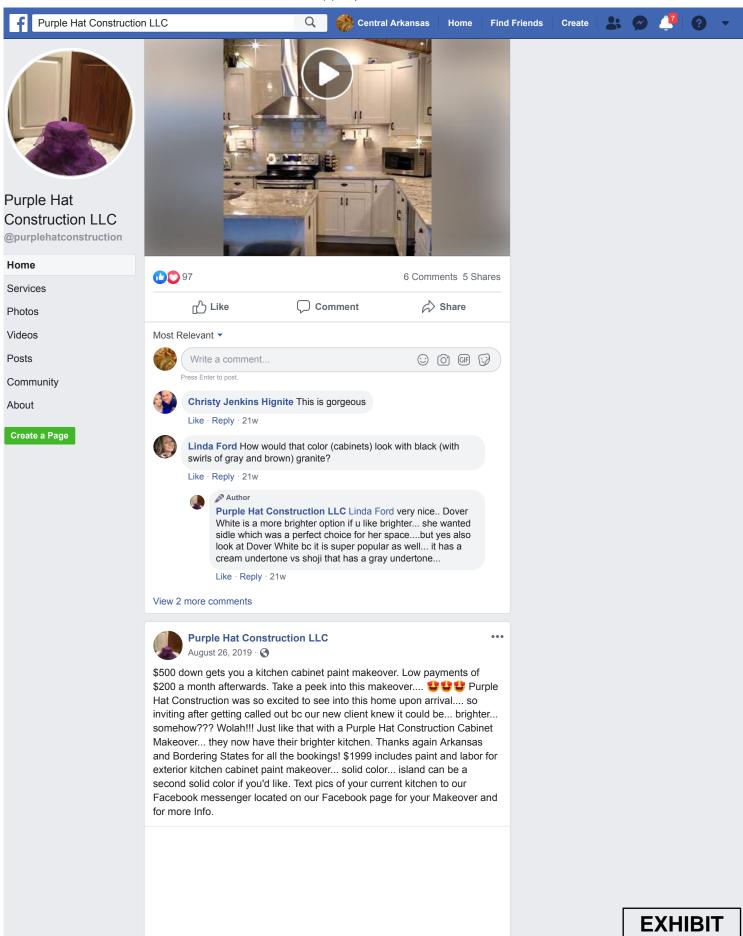
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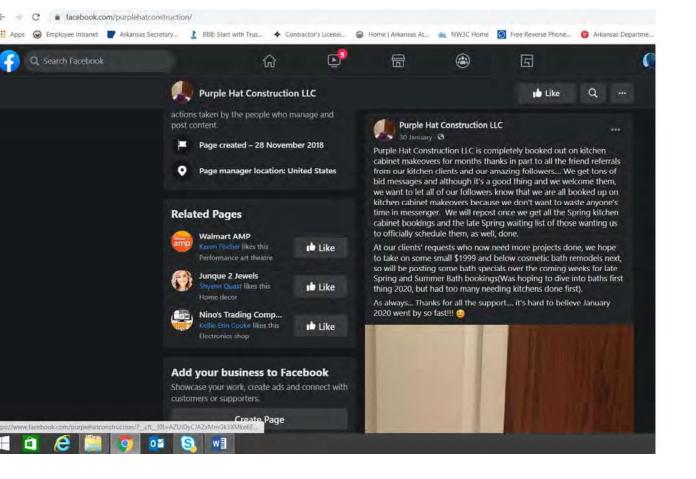


EXHIBIT B





Thu, Apr 11, 8:39 PM

\$1999 Solid color

Ask about back of bar after prime

\$750 backs of doors and drawers and inside trim pieces

50% \$1374.50 paid by check

Dover white

\$2749

Let her see bar primed then ask if she wants gray

EXHIBIT

C











Wed, Apr 17, 8:34 PM

Paint window sill

Just notes needed to add 😜





Ha! I was wondering what to reply 🐸

Mon, Apr 29, 3:21 PM

I blocked off next week for your kitchen so I'm just gonna wait and get doors on 6th and we will start your base that day as well. We will get the drawers either Monday the 6th or the following day depending on





either Monday the 6th or the following day depending on what all we can fit at once in vehicle... basically we will work pretty much everyday at your home starting May 6th until complete (except Sat and Sundays are rare)... should have complete by 13th...

Okay! Sounds great!! I'm so excited!!!

We'll be in Little Rock on the 6th and will be home pretty late that evening. But we can leave a key or have someone let you in?



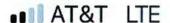


Fri, May 3, 12:23 PM

Hello! I'm going to empty all of the kitchen drawers tonight and I was wondering about the stuff in the cabinets... should I empty those as well? Or maybe cover the stuff inside them? What do you prefer?

Most people leave and just put a towel over their stuff... I don't use plastic bc it falls during the night or gets sucked by return air..

It gets mildly dusty... some people don't bother and just











Sun, May 5, 3:55 PM

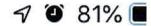
We will be getting doors in evening tomorrow

How would u like for us to get in?

Awesome! We should be home tomorrow evening but just in case we're not, the code to the garage is 10310



10:27 AM







Purple Hat Construction >

doors.... he'll be there around 6 or around that time frame. We will be there at various times Wednesday thru Friday and I'll text u when we are headed your way... we will start installing next week and wrap up by Tuesday.... if not Monday. We try to not work on weekends but may have to if we don't get enough done by Friday.

Ok, sounds great!!!







Tue, May 7, 4:07 PM

Gonna clean and sand tomorrow on your base at your place... not sure on time yet... will u be home all day or just have us use garage when we go?

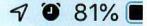


I'll be at work until 3:30 but please feel free to use the garage code when you need it!

I can answer now

Sorry! I meant to send that last text to my daughter.

10:27 AM







Purple Hat Construction >

Wednesday 3:54 PM

Swang by to take a look at your base... now that doors are off... looks in good shape... decided to wait and clean when we do 4 days in a row

We only need 4 days for base... doors/drawers are being painted

I'll prob end up doing a Fri-Monday work on base

Hate to work weekends but it's spring so booked solid

We will either install Monday





Hate to work weekends but it's spring so booked solid

We will either install Monday (or Tuesday at the latest)

What times Monday and Tuesday are u typically home bc on the final install day we will have u look over before payment



Okay, sounds great! Monday I'll be home around 3:30 and Tuesday I'll be home late (probably around 8:00). But my husband, Mark, should be





Saturday 12:06 PM

Hello, I'm just checking in to see if you're going to be at the house today?

Had a few workers sick... so short handed today... have two still working on doors and drawers today... takes about 100 man hours... to do those.... bases take some time too... but not so much. Doors and drawers are wrapping up Tuesday hopefully so just keeping that in mind.... love to come today... but worse case even Monday and Tuesday





Saturday 3:18 PM



Will call back in a bit...

Sunday 7:09 PM

I have thought and thought about everything that was said to me and I just don't think we are a good fit for your kitchen. I don't feel comfortable and discussed w my team and neither do they at this point. I can have primed doors dropped off in the evening when u are home from work and can mail u your deposit back. What is a good mailing





acord are being brought buck

This is Mark. I'm very disappointed to hear this. Can you please drop the deposit off when you bring my doors and drawers back? We'll need the \$ to finish the job this week. I am confused on why you are uncomfortable....The conversation we had was professional and about the quality of your work.

What time <u>Tuesday evening</u> is good?

Can I meet you tomorrow and pick up the check, doors and





Ok... let me see and text u tomorrow

Doors and Drawers are about two hours away and that couple is going in to get results from an emergency cancer operation so let me get in contact with them and see... if they can bring back doors and drawers tomorrow. And let me make sure I can get check tomorrow as well.

Their doctor appointment is in the morning... so assuming it's good news they will have no problem getting doors and







Let us know when drawers, doors & check is available and we'll pick them up. Thanks

Yesterday 8:11 PM

Since I didn't hear from today, is tomorrow when we'll meet to get everything? I'm on a time crunch and really need to get it all.

U can get your doors

On deposit

I obviously have many man





On deposit

I obviously have many man hours and materials purchased and did not forsee this event

I will collect on my jobs typically at end of weeks

I tried everything to get u your money sooner even tried to pawn my car.... to help u out... was offered \$150

So it is what it is and no ill feelings but can't create the money will have to wait to get paid again





We are in your home alone often times

We get very uncomfortable when we get questioned about our integrity? And we don't like communication with one of the parties being severed. I want u to trust who u hire. U want to feel good about your kitchen for many years to come.

Can you please call? I'm confused where this is all coming from.

Voice mail

And phone call from Mark





The part I'm confused about is the mutual trust? You told me you would need 4 days to get the job finished. You also told me that you'd have someone at my house to work on it through the weekend. We waited all day Saturday and no one showed up. We then contacted you to find out what the plan was since it seemed like there was a no show. The phone call was to ask you questions about the 4 days that you had mentioned. Not to question your integrity. You knew that we were on a time crunch but you assured





We paid you a deposit to have our job finished. We need the \$ back so we can finish the job you chose to quit or we need the job finished.

I assured you, several times during the phone call, that we chose your company because of the quality of work. So it was never our intention to question it. It was just to clarify the time frame.

I will refund and text u when I have the money

Asking me over and over if I'm





Why would I want to put me or my workers in a home where we are questioned if we are gonna be crooks?

Construction and life are unpredictable

Had a suicidal son and a father who got rushed into emergency surgery

Life isn't perfect

Don't know how much he told u? Not sure?

Close and let dry out





Can do quicker if do shifts longer than 6 hours

It's a 200 man hour job sometimes and the majority of those hours are in the doors

It's not a rich man's business

Someone we only make \$5 an hour or less

Hate that u didn't trust us

If u have your reasons.. I understand

U can have doors back at





Deposit will be given back when funds are available

That is not what was said or inferred during our conversation. We had complete trust with your company (we didn't even think about the word "crook"). It was all about the time line, not about the work or anything stated over & over again. And, I know things come up and happen unexpectedly. That's why every time you text me that it was





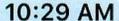
You said you would bring my drawers & doors back by Tuesday evening. What time can I expect them?

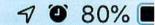
Again
Not sure who I'm talking to?
One says one thing... another says another thing?

My parents will bring them tomorrow night after 5 pm if that works for u?













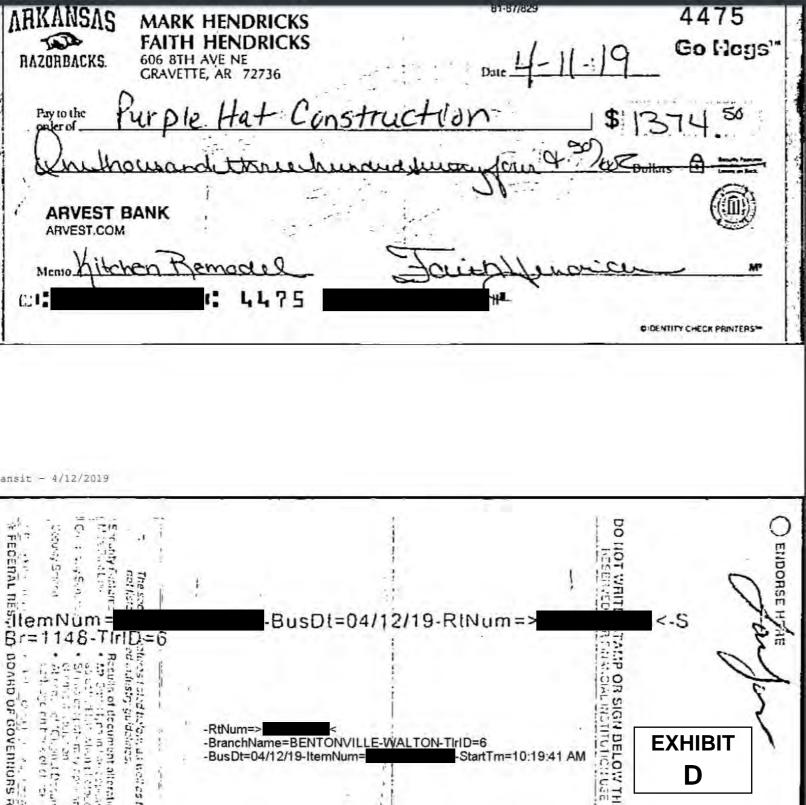
can I expect them?

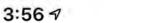
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My parents will bring them tomorrow night after 5 pm if that works for u?











 \leftarrow

MAY 2, 2019 9:20 PM



You sent \$999.50 to Laura Jones

From

ARVEST BANK-FAYETTEVILLE (\$999.50)

Transaction type

Money sent

YOU AND LAURA JONES

Contact Laura Jones

Send money

See your history

Transaction ID

Transaction made at 9:20:59 PM CDT

EXHIBIT E

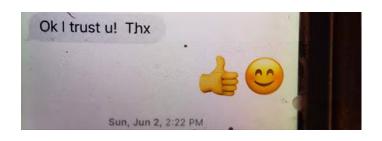
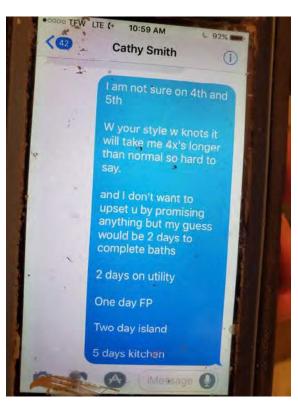
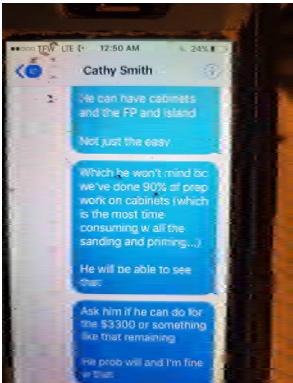


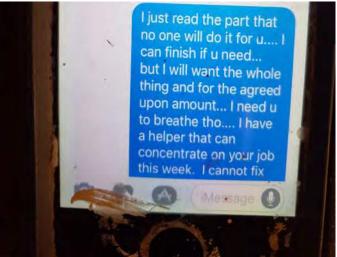


EXHIBIT **F**

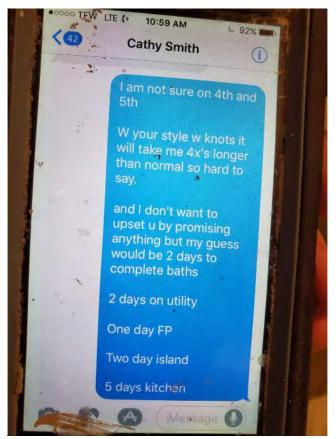


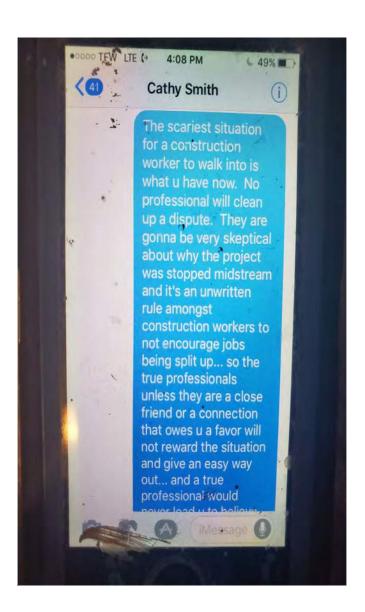






integrity is not rushing a ico for the sake of getting money knowing the paint will fall off in a year.... integrity is taking alloss on a job bothe woman had knots burnt in her cabinets and knew I could have gotten away w a crappy job and demanded sne still pay me. The reason why I have such an immaculate reputation is be money is not what drives me... quality ages. I know u don't know me well. But your cabinets are no joke... I know 100% u will not be satisfied with someone who does your job in







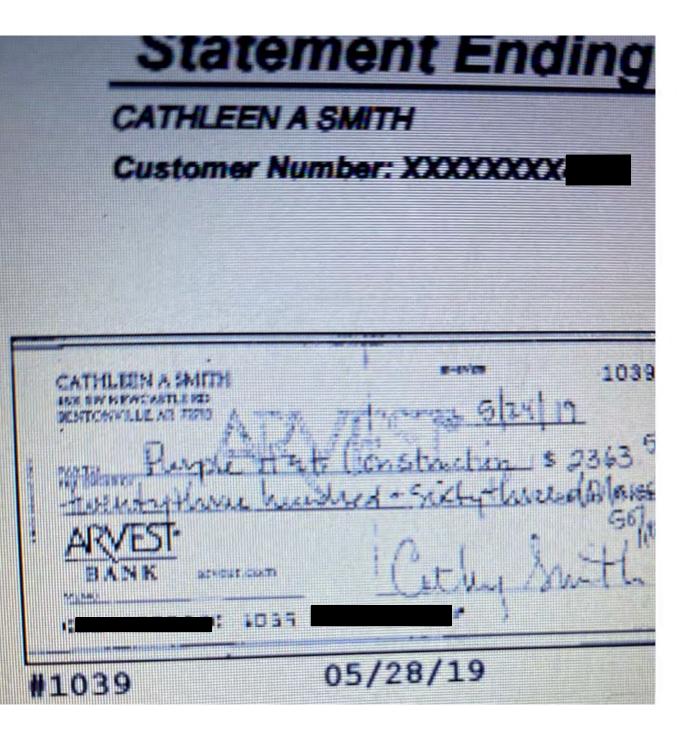


EXHIBIT G

Edith Collins

From:

Saturday, January 18, 2020 1:30 PM Sent: **Consumer Division** To: Consumer Complaint Form Submission **Subject: Follow Up Flag:** Follow up Flag Status: Flagged **Categories:** Home Repair/Construction/Appliances Prefix Mrs. Your name Devin Cohee Age 35 Your address 676 Weston circle City Cave springs State Arkansas **Zip code** 72718 **Home phone** 479-264-1650 Mobile phone Work phone Email devincohee@gmail.com No email communication Not checked Military history Do you have a disability? No Who are you filing a Purple Hat construction llc complaint against? **EXHIBIT** Company/individual address City Bentonville

consumer@arkansasag.gov

| State | Arkansas |
|---|------------------------|
| Zip code | 72712 |
| Phone | 479-312-7874 |
| Email | |
| Website | |
| Salesperson, serviceperson or other employee | Laura Jones |
| Product or service involved | Home services painting |
| Account number (if known) | |
| Transaction date | |
| Did you sign a contract? | No |
| Estimated amount paid | \$100 |
| Payment method | Bank account debit |
| How did you first encounter this business? | |
| If other, how did you encounter the business? | Facebook advertising |
| If solicitation is in language other than English, what language? | |
| Where did the transaction or purchase take place? | At my home |
| Have you contacted another agency about this complaint? | No |
| If yes, list name and address of the agency. | |
| If yes, what action was taken by this agency? | |

| Have you complained directly to the business? | Yes |
|---|---|
| If yes, when and by what means (phone, email, etc.)? | Text email and phone call |
| What was the business's response? | They stated they would not continue work and would give me a refund |
| Explain the circumstances surrounding your complaint. | The company started the work and stretched it out over two weeks. The owner of the business became upset when I kept asking when to expect people to be in my home to do the work. After refusing to tell me a timeline she offered to refund my deposit. I used PayPal to put down the deposit for the work however she wanted to mail me a check. I waited for two weeks and had no further communication from the business and no attempts to returns calls. I opened a dispute with PayPal and was able to get my money back. I have since been reached out to by other people asking me about my experience and them letting me know about how she has scammed them out of money by not completing work. |
| | Business should make refunds to the other people who have lost their money by the work not being completed or even started. |
| Do you have supporting documentation? | |
| Additional document upload #2 (if needed) | |
| Additional document upload #3 (if needed) | |
| | Submit |

Sent by ProcessWire Form Builder • 2020/01/18 1:30pm

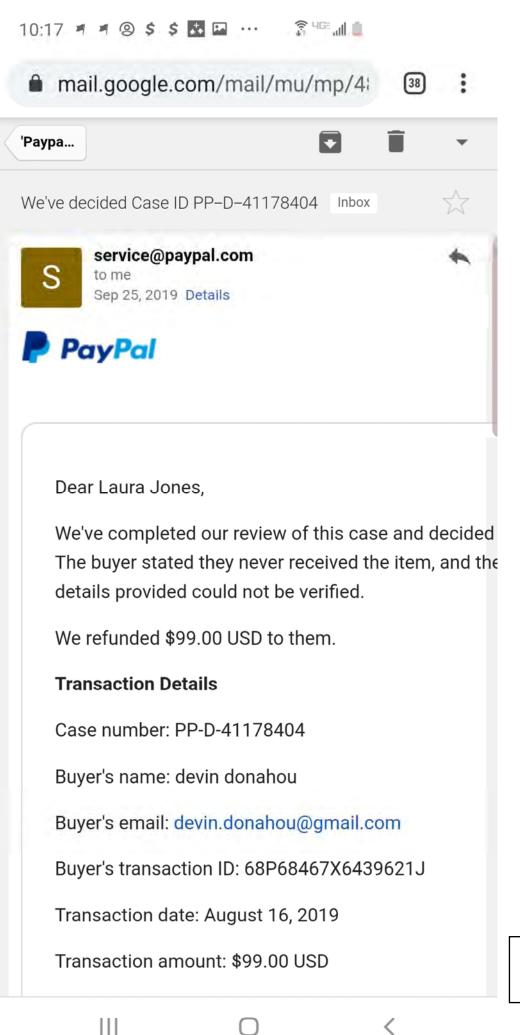


EXHIBIT I

Edith Collins

From: consumer@arkansasag.gov Sunday, January 19, 2020 6:15 PM Sent: **Consumer Division** To: Consumer Complaint Form Submission **Subject: Follow Up Flag:** Follow up Flag Status: Flagged **Categories:** Home Repair/Construction/Appliances Prefix Mrs. Your name Laurie Smith Age 34 Your address 11403 South Wedington Blacktop Road City Lincoln State Arkansas **Zip code** 72744 **Home phone** 479-824-2286 **Mobile phone** 479-790-2286 Work phone Email lsmith@farmcards.org No email communication Not checked Military history Do you have a disability? No Who are you filing a Purple Hat Construction LLC complaint against? **EXHIBIT** Company/individual address Unknown City Fayetteville

| State | Arkansas |
|---|--|
| Zip code | 72701 |
| Phone | 479-312-7874 |
| Email | purplehatconstruction@gmail.com |
| Website | Purple Hat Construction |
| Salesperson, serviceperson or other employee | Laura Jones |
| Product or service involved | Cabinet Painting |
| Account number (if known) | |
| Transaction date | July 25, 2019 |
| Did you sign a contract? | No |
| Estimated amount paid | 299.00 |
| Payment method | Credit card |
| How did you first encounter this business? | Responded to website or email solicitation |
| If other, how did you encounter the business? | |
| If solicitation is in language other than English, what language? | |
| Where did the transaction or purchase take place? | Via the internet |
| Have you contacted another agency about this complaint? | Yes |
| If yes, list name and address of the agency. | Washington County Sheriff's Office |
| If yes, what action was taken by this agency? | None taken |

| Have you complained directly to the business? | Yes |
|---|--|
| If yes, when and by what means (phone, email, etc.)? | Text messages |
| What was the business's response? | She called the police on me and told them I was harassing her. |
| Explain the circumstances surrounding your complaint. | On Thursday July 25, 2019 I contacted Laura Jones from Purple Hat Construction LLC in regards to an ad that she was running on Facebook for painting of camper cabinets. I spoke with Laura via text and established that I would pay her \$299.00 to paint the cabinets in my camper. She stated at the time that due to booking, she would need me to pay to hold my spot. I paid Laura the \$299.00 via paypal on July 25, 2019, and she said that she would get with me at a later date when the weather cooled off to come out and do the work. |
| | On Wednesday September 18, 2019, Laura text me that she had some horrible stuff happen with her business and that she was not able to get out to provide the service at the time we had discussed. Directly after, I told her that I I wanted a refund and she told me she did not have the money. I filed for fraud with my credit card company and they returned my money because they deemed it fraud. |
| | After this all had happened, I began seeing via facebook posts that she had done this same thing to others, but unfortunately others did not fair as well because they paid with cash or check. I did receive a refund from my credit card company, but I wanted to make sure that this was documented that the same thing happened to me. |
| | She needs to go to jail. She is flat out stealing money from people. She is a scam artist. There are a lot of people who will unfortunately never see their money again, and she should be in jail for that. |
| | I have documents of the harassing texts and the police report from Washington County Sheriff's Office is 202000199. The files would not attach on here because it exceeds max file size. You can contact me and I can email them over. |
| Do you have supporting documentation? | |
| Additional document upload #2 (if needed) | |
| Additional document upload #3 (if needed) | |

Submit

Sent by ProcessWire Form Builder • 2020/01/19 6:14pm

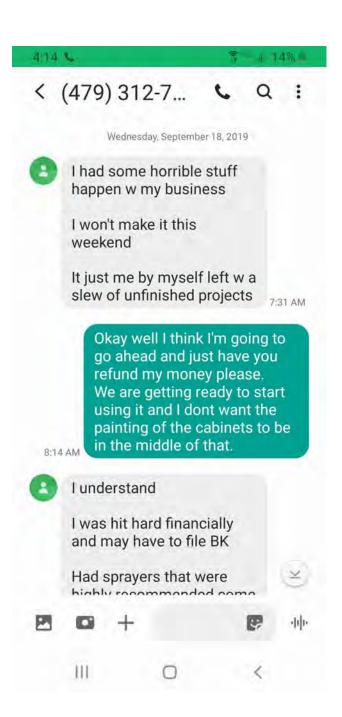
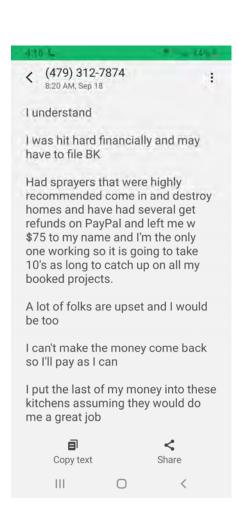
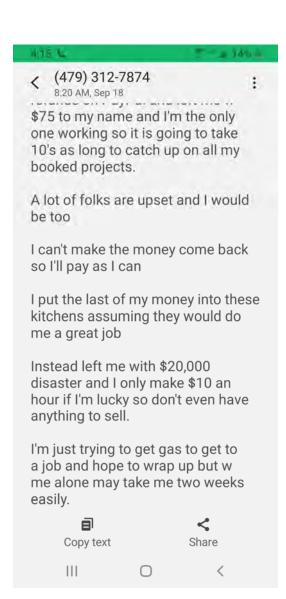
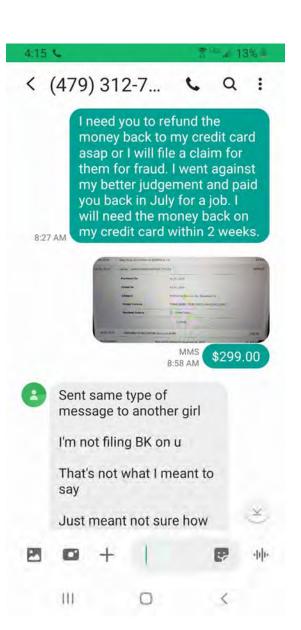


EXHIBIT **K**











\$399

Paint base trim and door way trims only (no doors) in master bath and going into bath from bedroom (both sides)

One side on closet entry on door trimming (facing bath)

Windows trimmings

Shower strip

Both sides base trim surrounding powder closet(not sure why I had this in the notes prob just clarifying not to paint like cabinets)

\$788 walls and ceilings in bath w two accent walls minus the \$50 texture already done behind mirror =\$738

Paint and labor \$1137

50% down \$568.50 50% completion \$568.50



EXHIBIT L





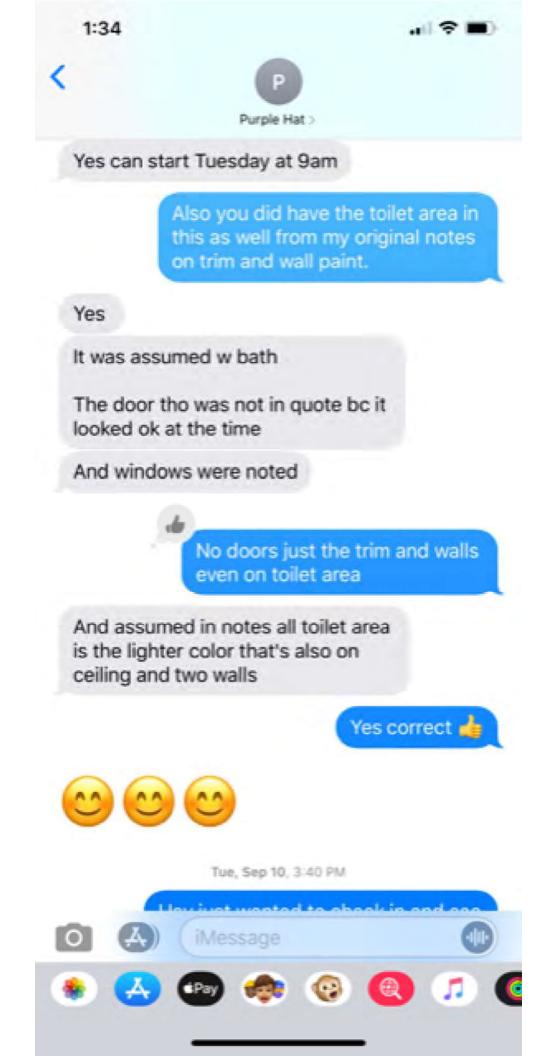
The color swatches are on my IPad

But will want to clarify colors again...
do u happen to still have the paint
can left over from Bedroom and also
I can have them color match the
trim paint you've been using... and
clarify everything one more time
and get started tomorrow.

Nate can some and get supply down money and can clarify this evening if u are home? He or another guy will do the majority of the painting...

Main bath walls and ceiling I have Serene Tan in Satin

For Accent walls in bath I have Aspinwall Satin







Hey just wanted to check in and see if the start date changed?

.11 3

No Still coming today



Cool Brink had to run some errands so as usual we left the front door unlocked for ya.

Tue, Sep 10, 5:55 PM

Had to let some folks go

They weren't fast enough... they were good... but having to reschedule too much

Growing pains

My main guy is going to come and start yours tomorrow Nate left so I'm stuck w a bunch of unfinished projects

I hired some sprayers who came highly recommended and they oversprayed on everyone's stuff and it sucked it all thru their houses so having to clean and reroll things bc I don't have a sprayer to spot touch up their misses

So gonna be a few days before I see a break... so sorry



I won't be able to do your bathroom

I've been hit in all directions

And then had some ladies who knew each other do refunds on PayPal and also didn't pay me thousands leaving me with less than \$75 to my name bc I assumed I'd get paid and didn't see this all coming for nothing.

A lot of folks are extremely upset w me... I'm in the middle of projects and I can't finish them.

I'll have to refund u as I get more funds from working and hopefully I'll be back on my feet in two months.

So sorry but I literally am broke and won't have any funds until I wrap up some things which is gonna take me weeks to do.... bc I'm by myself

Hoping to not have to file bankruptcy but sprayers promised me good work and instead left me w \$20,000 worth of halfway projects and bc I don't have a sprayer I have to reroll everything bc texture has to





iMessage





















I won't be able to do your bathroom

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iMessage























No im going to refund u in next weeks (gonna take me two months to get back on my feet)

They kept needing more and more I was hoping to get thru it all and collect as normal

That didn't happen at all

What I'm saying is that u want to get someone else to do the job bc I'm in a major pickle

I lost \$20,000 in two weeks from spraying disasters

I have two projects that should wrap up next few days and they will pay me

Then I can refund u

Just telling u situation bc I know u have waited on me in the past

And this disaster is gonna take me months to dig out of

Hopefully I do















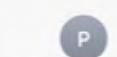












Purple Hat >

months to dig out of

Hopefully I do

But yes if not I will have to file

Not on u

On kitchens that are halfway done and folks are livid and I'm scared of contact and then coming to my house

Had several come yesterday and it's scary

I don't blame anyone from being upset

Some kitchens I bidded on for \$1999 have taken the deposit and any future earnings bc sprayers came in sprayed all over and bc they did a horrible job I've had to reroll costing me tons of money and some kitchens ended up costing \$5000 and still no payment

Had several not pay me still

Never dreamed it would end all over two week horror



























I don't have money

I had several kitchens all going on at once and then sprayers made a mess

Cleaned up their mess but women were sooo upset at everything so they got refunds on PayPal vs paying me finals

It all came to a head before I could stop it

Tried to make things right so we could move forward as normal but bleed out money in all directions and canceled jobs and payments

I spent \$100 on paint and had bought 5 gallon of primer (to do over several jobs)... had the trim base(\$70) and tons of basic supplies and bought all new rollers and \$300 worth of tape and hundreds of plastic to be split over multiple jobs... they took all of that as well

I am 50% done w a kitchen and she is being patient and I have her paint so just need to keep gas and should



























11 3

Purple Hat >

I spent \$100 on paint and had bought 5 gallon of primer (to do over several jobs)... had the trim base(\$70) and tons of basic supplies and bought all new rollers and \$300 worth of tape and hundreds of plastic to be split over multiple jobs... they took all of that as well

I am 50% done w a kitchen and she is being patient and I have her paint so just need to keep gas and should get her wrap up prob not this week but next

She will give me the money to repay u

They took my materials and my ladders



.... SI

Yea

I'm just a stupid drunk texter

But a few women who knew each other ganged up and are scamming me... bc of PayPal protection PayPal sides w them deducting my account automatically.

I'll fight it but got very overwhelmed bc Nate quit for a day after we had to endure hours of meanness from one of several customers in a row. One claiming we delivered the wrong doors and we were so stupid only to apologize later bc she was just so shocked we could transform doors that good... yet didn't pay in the end... got hit pretty hard and I drank for days(I have a problem w that when get severely upset)... not proud of it after a couple day break from most of it... Nate and I are back at work today... gonna get thru it... just rough.

Nate can be there Monday

He doesn't know much of anything bc he was already so upset and sad over a couple he thought liked him



























Purple Hat >

one of several customers in a row.

One claiming we delivered the wrong doors and we were so stupid only to apologize later bc she was just so shocked we could transform doors that good... yet didn't pay in the end... got hit pretty hard and I drank for days(I have a problem w that when get severely upset)... not proud of it.... after a couple day break from most of it... Nate and I are back at work today... gonna get thru it... just rough.

Nate can be there Monday

He doesn't know much of anything bc he was already so upset and sad over a couple he thought liked him put him down for no reason so I let him rest and he's better now that they apologized. He takes his work seriously as ya know....

Nate can be there Monday and he will do a great job as always and will prob need my help of course on some which is cool...

Yea I have a bit of work to do on myself personally and professionally... no doubt



























... SI

Purple Hat >

I have extreme bad short term memory have ever since I was a kid yet they pulled me from public schools bc my IQ and had me start college early... state paid. Common sense and memory however... yea forget it. Ain't happening w me... so trust only my texts and other's memories so no disbelief just telling va what I was thinking when I thought I'd left paint but yes still needed some more and I was gonna spend a few hundred to wrap all in plastic and spray your bath which requires 3 times more paint and hundreds in plastic and cardboard and prep work... but the spray is ten times faster... but yea after the disaster w sprayers.. oh my! Never spraying unless I have to. But yea your memory is always gonna be better than mine and it gets worse if I'm under stress. So believe me... No shock here to a point. We love u guys. I totally take blame here... obviously. It's all a mess.... trusted wrong folks... should have stuck w Nate and I just tried to please everyone and still provide services. Not a smart decision I can clearly see that now... just hate bc I have several leases that may be hard for





iMessage





















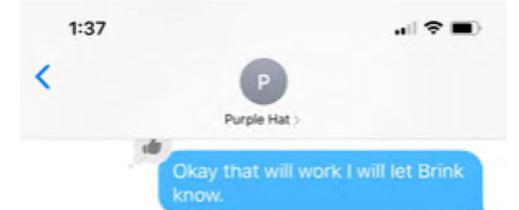


guys. I totally take plame here... obviously. It's all a mess.... trusted wrong folks... should have stuck w Nate and I just tried to please everyone and still provide services. Not a smart decision I can clearly see that now... just hate bc I have several leases that may be hard for me to pay for now. I'm sure I'll get thru it... but just been in shock women can purchase kitchens and let me do work then get refunds from PayPal... and yes customers are happy once I clean up the spray mess... but I've been left w the \$20,000 bill for the two week mess...but yea hate u guys had an once of stress from it. Would have been fine had I not drank for a few days straight... not fair to u both at all. But yes I'll text u when Nate heads your way... either today or Monday.

I'll give him \$500 cash

He is busy w some family stuff today so prob Monday prob early morning bc he has an appointment at 10am in Rogers so he can drop off around 9:30 am

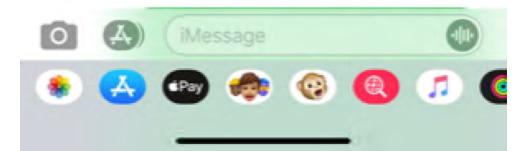
I can text when he heads your way as always



Delivered

Sun, Sep 22, 5:01 PM

A ton more random things have happened so I guess folks talk and I'm not gonna get out of this mess easily... had several want money thru PayPal and some want money back who I was set to do kitchen for next week so folks are definitely talking. If I play favorites they will ask for money to be returned even tho it's legitimately yours the court doesn't see it that way when multiple folks want what I have on hand so basically I have to make sure everyone is covered before I send out cash. Nate and I will work hard. I will try to recover all my materials that the multiple spray teams had So I can proceed w paint and materials they have... I will mail u funds when I'm allowed. Everyone is super stressed and I'm not helping anyone by responding unless it's w a check in the mail. So Nate and I will continue to work and try to get all this resolved asap.





Sent as Text Message

Sat, Sep 28, 10:16 PM

Hi Laura I have heard from several people that you are planning to skip town if you haven't already. I have also heard from several people that you did return their refunds and I don't understand why you are refusing to return my deposit by law since you scammed me and used my money to help cover other jobs not one penny was spent on my job so I am due my money back period. I am giving you and Nate a few more days to pay It otherwise my attorney will be handling the case against both of you!

Sent as Text Message

Mon, Oct 14, 9:16 PM

Hi Laura you have not communicated with me and still have not returned our deposit that you took and then stated you couldn't do the job due to issues. I think I have been patient enough and would like my deposit returned. Please contact me immediately so we can get this taken care of!

Sent as Text Message





iMessage





















EXHIBIT M



Typically replies within an hour

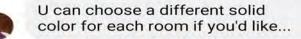
Ill have to find a pic of the diningroom but it is on the other side of the fireplace like a galley diningroom, narrow.

Yes you would qualify... it would be exterior kitchen cabinets.... no insides.... no backs... it painted walls only a single solid color... it would not include any hallways or foyer or stairway but would include kitchen and dining and living room.



If u could send me more pics in case of dining and other living walls and kitchen but looks like u qualify

> Okay, yep, lemme find some more pics 😀



Well, i ha unded corners connecting the dining/kitchen to













0









Purple Hat Constructi...







Well, i have rounded corners connecting the dining/kitchen to living soooooooo, im not sure how to "switch" colors or if I just need to do an accent wall?

Yes... u can do an accent wall...
using the kitchen color and wrap it
around if you wish... but you can
tape off as well..... with a super
clean line that divides the corner...
just no more than 3 colors and no
multiple accent walls bc it gets
too labor intensive... but starting
and then starting the next color is
fine even if it wraps... just too hard
to do multiple stand alone accent
walls...



Basically 3 stopping points of color is within bid



Go colorful in dining... if possible... even if a soft hue...











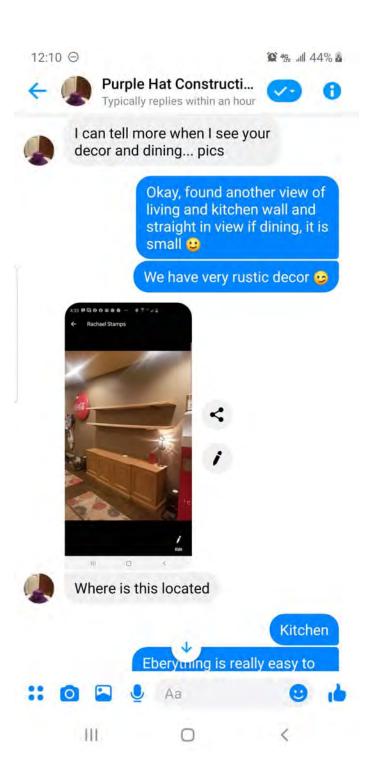


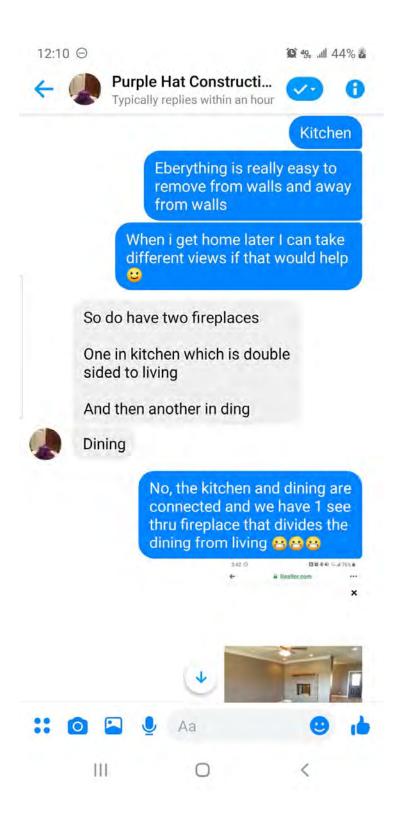
















Purple Hat Constructi... Typically replies within an hour









III take a few more pics when i get home 😀

I LOVE the chocolate brown... it works with all your decor if it was me.... I would have some fun on the kitchen island and pick the perfect shade of blue.... the cabinets will brighten up everything sooooo much...... I dont think it's your wall color at all that needs to change... instead I think a Dover White or similar on main kitchen cabinets and then a perfect blue on the island(islands u can change color on every few years as u wish)... then add knobs.... then white wash both sides of your fireplace with shiplap above each....

I think I would add more by for \$1999 doing the exterior of your kitchen cabinets and throwing in two whitewashed fireplaces with white shiplap(\$1500 value alone on just the fireplace makeovers).... vs paint any of \checkmark valls.... you will be blown away by how much



























Purple Hat Constructi...



19 49 all 44% &

Typically replies within an hour

I think I would add more by for \$1999 doing the exterior of your kitchen cabinets and throwing in two whitewashed fireplaces with white shiplap(\$1500 value alone on just the fireplace makeovers).... vs paint any of the walls..... you will be blown away by how much the Brighter cabinets and brighter fireplaces and a pop of color on your island will do....

Usually I charge \$299 for knob labor install but could throw in as well as long as you purchase the knobs...



Okay.... enat do you think of this: could we do cabinets, island, add backsplash and both sides of fireplace? Because we have lots of coke stuff and it is RED and white and I think you are correct in the changes to cabinets and island, and fireplace vs. wall color.... i havent found "the knobs" so IIII wait on that

I measure and have less than 22.5 squareet of backsplash















111











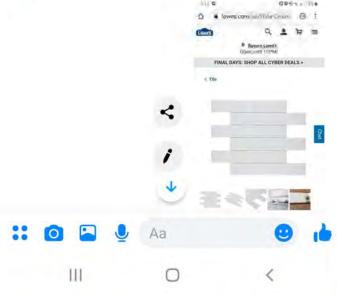
Typically replies within an hour

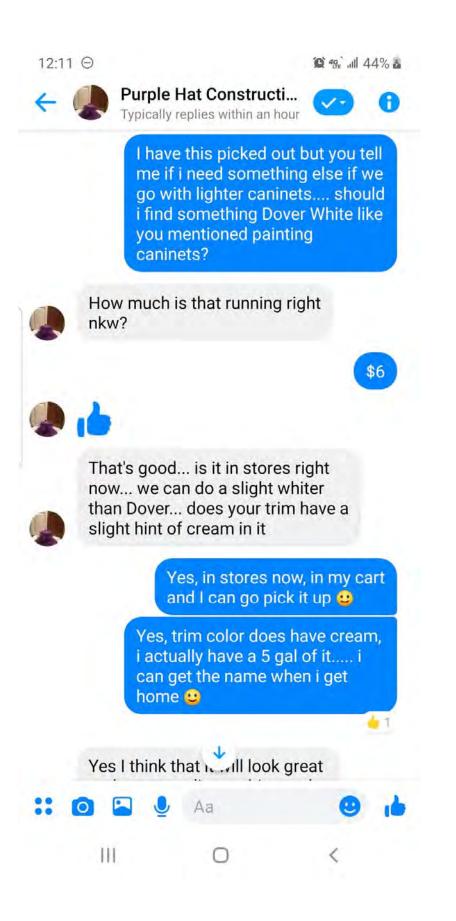
Okay, lemme get a pic

I book and bid online... I can do one of two ways though... u do a check or I do Venmo or Cash app (not sure Cash app limit... usually use Venmo for bath cabinets)... Venmo will allow credit cards.... I do half down to book and then clients pay the moment we complete the job and its looked over... pretty simple process...

It would be a Jan 13th painting... I tend to move ahead of schedule sometimes by weeks but that will be your blocked off week if u book today.



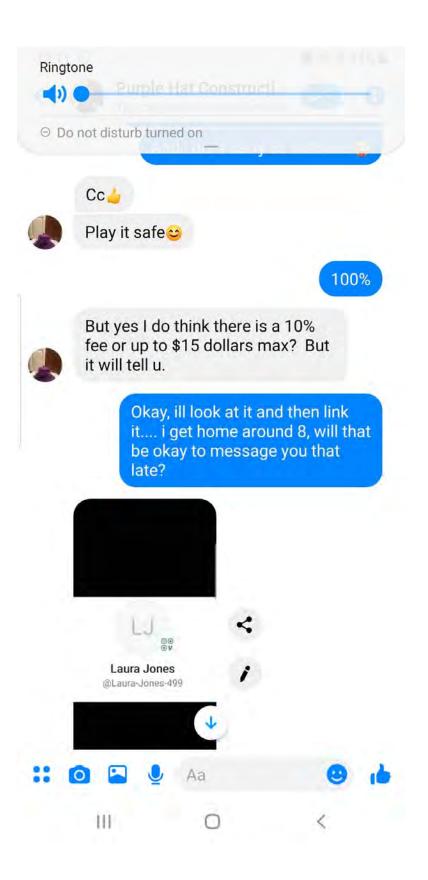


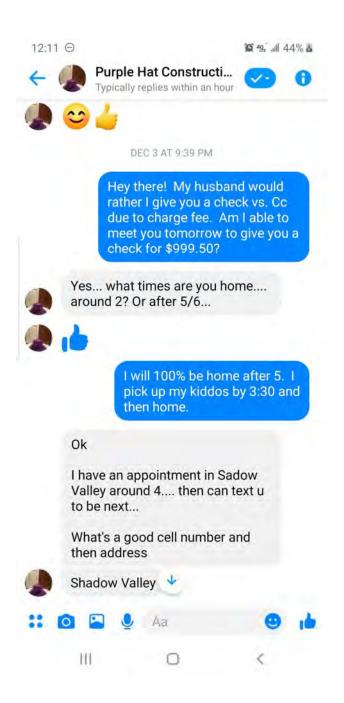


















Purple Hat Constructi...

Typically replies within an hour





My car is dying for some reason....
I'm going to have to check it out
tomorrow. Plus I found out I have
to move all of a sudden bc my
landlord needs to sell asap.... so
trying to get my stuff still loaded
up.... I can easily get doors when I
come on the 23rd and start
base.... that way I'm not moving
doors twice.



Yikes

That puts the timing behind a week correct?

This concerns me because I have already paid 1/2 down and I am now being told you have no phone so Facebook is the only way to communicate and now you are pushing the dates out. I realize everyone has their own stuff going on but I need to know you are going to deliver or I need you to drop off a check for \$1000 tonight. I apologize on being so forward but I need an answer either way as I am leaving 1 up ing in the morning to bury my Grandma. Thank you













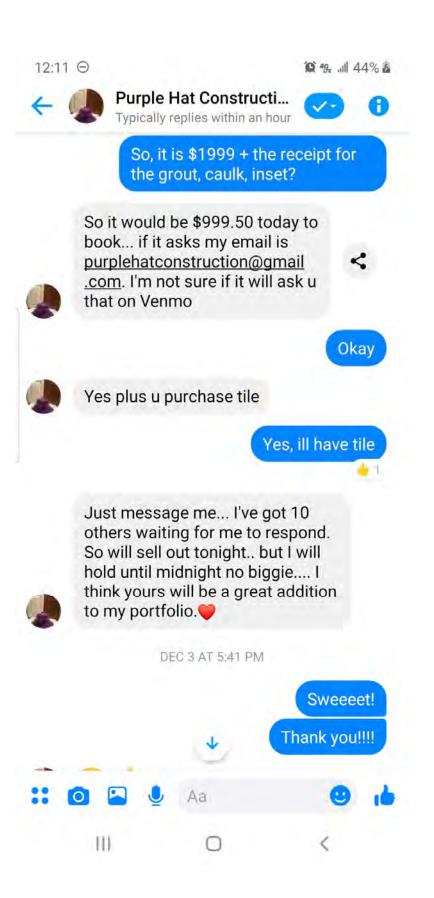




111



<









Purple Hat Constructi... Typically replies within an hour





5:29 PM

I have your address and will mail you a check

Hate to be so fast forward but I dont deal with this. I think the young folks have a name for it.

Thank you for showing me this side of you bc I risk a lot going into people's homes. This is really strange to me. And I do not want to be near you nor put my workers near you or your home. I actually felt sorry for you.... it's a \$4500 job. But sometimes folks are so stressed out... they dont see kindness no matter what. I will mail the check.... I dont have a phone bc of folks like you.... all your stress and all your "nobody listens to you" gets dumped on me and my workers. No thank you. Go pick on someone else.



6:40 PM

Excuse me? You are real fast lipped to the off like that. You have had hing but excuses

























Purple Hat Constructi... Typically replies within an hour





Excuse me? You are real fast lipped to come off like that. You have had nothing but excuses since pur inital conversation, even showing up 2 hours late on initial review and now you are stating you felt sorry for me? What for, responding to your ad? I was happy to give my hard earned money. Wow! Thank YOU for showing me your real side. I have shown you nothing but kindness and have all our communications to prove it because it has been nothing but text messages.

You have so many hurtful things in your text and I haven't done anything but ask a question about you being able to deliver, clearly the answet is no. The rest is on you. Maybe the issue is you and your work ethic or lack there of.

I'll be expecting a check by the end of the week.

Have a nice night.











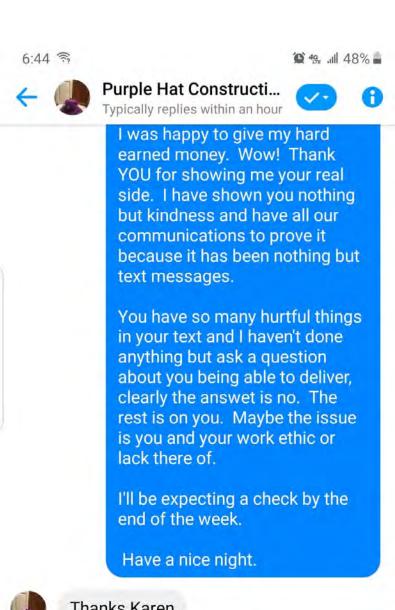




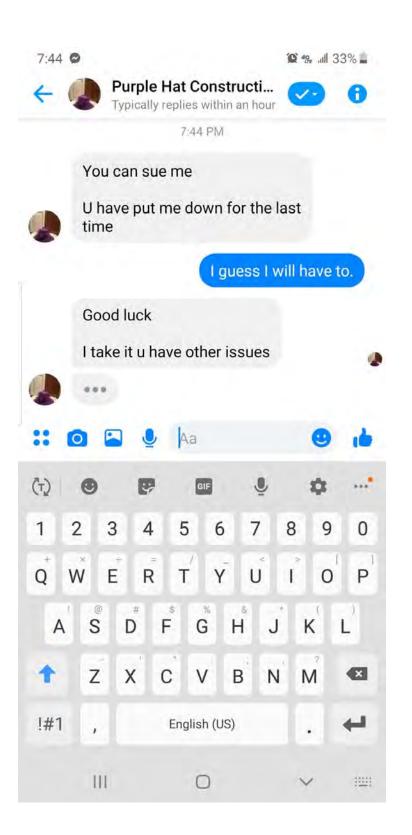




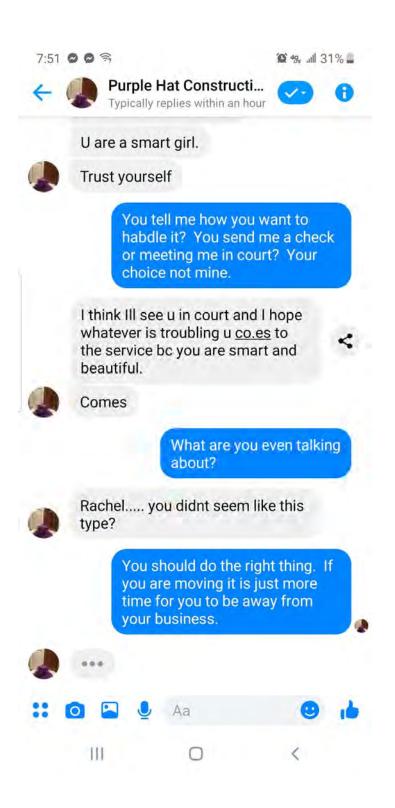






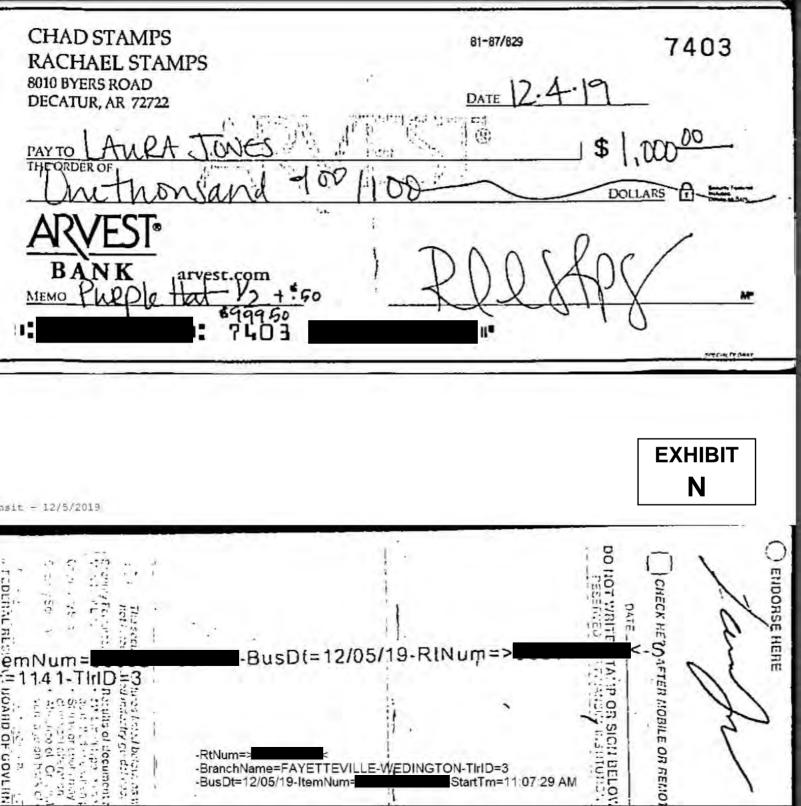












From: Laura Jones [mailto:jarsofsunshine41@gmail.com]

Sent: Tuesday, February 25, 2020 2:42 PM

To: Melissa Gladden

Subject: Fwd: Complaint 20-00364

I believe she posted it the day before around 8:35 on the 16th and I received the prunt of it on the 17th and thereafter with the 17th receiving tons of activity and harrassment encouragement and many days of harrassment and shares and comments and drug slander got included. It was absolutely awful. I have since moved... but not every victim of harrassment can. I was one of the lucky ones.

----- Forwarded message -----

From: Laura Jones < jarsofsunshine41@gmail.com>

Date: Tuesday, February 25, 2020 Subject: Complaint 20-00364

To: Melissa Gladden < Melissa.gladden@arkansasag.gov >

I also want it noted that the day she claimed she could not make our scheduled appointment of the 17th of Jan bc her grandma passed away was the day she was continously adding to the post all day long.... so not sure what time her grandma funeral was.... but she was using Facebook to harass me the day of Jan 17th all day long and many days after....

----- Forwarded message -----

From: Laura Jones < <u>jarsofsunshine41@gmail.com</u>>

Date: Tuesday, February 25, 2020 Subject: Complaint 20-00364

To: "Melissa.gladden@arkansasag.gov" < Melissa.gladden@arkansasag.gov>

My reference to my age is that I had over 20 years left of work plus some in that community and in Arkansas and in other states where the posts spread full of lies about my character and being a druggie the character attacks she encouraged to be reshared fully aware of all the slander has damaged my reputation and the trust of others now who will never consider using me or my company is truly devastating and to the tune of in the millions.

On Tuesday, February 25, 2020, Laura Jones < <u>jarsofsunshine41@gmail.com</u>> wrote: Typo: Fair is Fair(not Faith is Fair)

On Tuesday, February 25, 2020, Laura Jones < jarsofsunshine41@gmail.com> wrote: Correction I just noticed. My damages would be \$2,000 a day per potential client for drug character damage times 50,000... is actually \$100,000,000 that I believe she damaged me and being that my clients are sometimes repeat clients... the damage of Rachel encouraging shares of her druggie comments post to be shared where I was called a crackhead and druggie is beyond financially damaging to me and the damage is in the millions. She ran the post publicly for many days so over the course of times it was not even limited to just 50,000.... I believe hundreds of

EXHIBIT O

thousands of people seen her 100 +/- reshares all across Arkansas and fair to say reached even other states. Just one share was to a group containing approximately 14,000. She encouraged the most fearful emotional and taunting people to find out who my child was (per her asking who was in a personal pic with me on my personal Facebook page who was my then 14 year old child) harrassment, as well. TelliNg the trolls that they were cracking her up. It was no joke on my side nor the cop who called her. She may of had a right to write a fair bad review but to damage my character where I have to have people's trust because often in their homes alone is in the millions and I'm in my early 40's and clearly can not take back the damage to my character she encouraged to be shared. Faith is fair.... what Rachel did to me because she threw a fit because she couldn't make our scheduled date and in return I couldn't make her need for me to come a day earlier than initially scheduled to her getting mad because after several put downs I stood up for myself and my design time she had already received to her going on a social public media fit to mocking me and cracking up at trolls wanting to know where I live and her encouraging and asking about my son and asking for reshares of druggie slander is not cool and I hope no one ever goes through the fear of hundreds of thousands of people in their area believing and some acting on hate Rachel encouraged to recieving voicemails and messages and address posting that made you literally fear for yourself and your child's safety all because I refused to give her money I earned through my design time with her and a dispute that became really unsettling because I was not stupid and refused to rush to her home that night to hand her back money I had already earned. I believe everyone has the right to voice their experience if it's a fair statement. What I dont believe is that a customer has the right to ruin your safety and peace of mind and ruin your character falsely with drug slander and somehow justify it just be I had bad HR after she put me down multiple times. Post a fair negative review... but in no way did she have the right to attack my safety and character and I hope no one ever has to deal with Rachel and her creepy gathering of others and I am shocked that many have wrote in stating what seems to be the same sort of language and all in the same timing and have even lied in timelines and about postpone timing. There is no doubt she summoned several of these ladies and I have screenshots showing several of these ladies interacting with Rachel on the slander drug post.

On Saturday, February 8, 2020, Laura Jones < <u>jarsofsunshine41@gmail.com</u>> wrote: Attention Melissa Gladden Referencing Rachel Stamps

Rachel Stamps did not have a specific appointment with me Dec on the 4th 2019... I thought she understood I was squeezing her in because she wanted to write a check versus online. She had told me she didnt get home until 8pm and asked about if too late for me previously in time for her to send a message.... so I did not think too much of a later visit. I did not think of her as an appointment but was trying to make it to her on Dec 4th.... she lives out in a rural area. I was hoping various times and then to be there around 8 after drive thru...at 7:15, but did not until later on and I asked her when I arrived to get check if too late to talk bc of bedtime and she said no and we continued on with an in home consultation. We have had approximately 200 back and forth forms of communications prior to the date of our dispute on 1/16/2020. Getting ready for a home project is very time intensive on planning and questions, etc. Rachel booked on Dec 4th 2019 and did not receive a start date whatsoever. She said she was cool and we discussed Jan and she said after Dec 26th she was open. She said she did not have to plan around anything and home would be available whenever we could do it from Dec 26th throughout Jan was

understood. I weeks later set up with her and we ended up with a Jan 17th day and then a second day Jan 23rd. She ended up not being able to think she could do the 17th and I ended up not being able to uphold a reschedule for the day earlier so I told her we could just start fresh with the second day of the 23rd. Despite all the time and energy and question after question and design consulting in her home and always being available for all the 200 communications up to that point for weeks... she demands I either deliver the day before which she had wanted rescheduled or go to her home that night and give her back her \$1000 which initially I said I would just mail back. I was not about to go to her home with her giving me an ultimatum. She had dead things on her wall and which is normal for Arkansas I was aware guns were probably on the property which is great for protection on her part... but I did not see any reason to go back onto her property so I refused to agree to it. I thought she was having maybe an emotional day because she said her grandma had passed away or something else she wasn't saying but she said it was just dispute with me. It didnt make sense to me because she booked bragging to me in her home how flexible she was and I would get to choose all the way throughout Jan when to do the project. I told her sometimes we run ahead of schedule... but we did not be holidays slowed us down. So I was just shocked when she was so forward all of a sudden. I had already spent time just responding to correspondences for weeks... my in home consultation is worth \$250 alone which she had already received and then numerous communications since. So yes I was initially fine with being done and walking away when she gave me an out of the blue ultimatum as if we had a set in stone deadline. Again when she booked she said anytime after Dec 26th and she knew it could be a Jan project. She then told me she wanted a check from me she could cash???(I took it to mean she was saying I was shady). At that point I had enough and told her to sue me and that I wasnt going to deal with it and I did not represent great HR at that point. That is my bad. I want to be compensated for my in home consultation and the design communications and advise I gave her for weeks as part of the job. At minimum I deserve \$250. My half downs are nonrefundable but when someone gives me an ultimatum I will not continue the majority of the time bc it's not worth it. She had already told me that we would have free roam to come and go into an unattended home... so if any trust was gone ... it would have been super awkward to do a 150 labor hour job at that point. I am not willing to volunteer her a full refund at all. My time is of value. I told her to sue me. It does me no good to get in silly disputes with grown women and that is exactly what ends up happening on both sides. I am silly in disputes when I get scared for my safety or my child's. So I should have stopped all communication period and just let a third party figure it out and make sure I get a mutual non harrassment and settlement in writing because we clearly didn't do a great job navigating this dispute. She posted a Facebook post that was very vindictive and made it sound like I was putting her off.... like she had this major set in stone appointment and timeline and encouraged posts from those who were harrassing calling me a druggie a crackhead and posting address.. about my divorce and personal info and wanting to know who was in personal pics with me(it was my child) and was way more than any alleged consumer protection... it was harrassment. I was getting phone calls/messages/postings on my Facebook from trolls that she was encouraging via her post. The cops called her and told her to tell comment poster to stop with the personal info... address type of stuff. The post remained up with still the address on it and my personal information although Rachel had power to delete. Rachel would send me request after request on Venmo and I had to finally block her as messages were coming in that I should just pay her from her trolls or my business is going down. I was getting messages from women saying they were going to lock me up and make sure they team up and shut me down. No ID voice messages and phone calls full of harassment and threats... Just

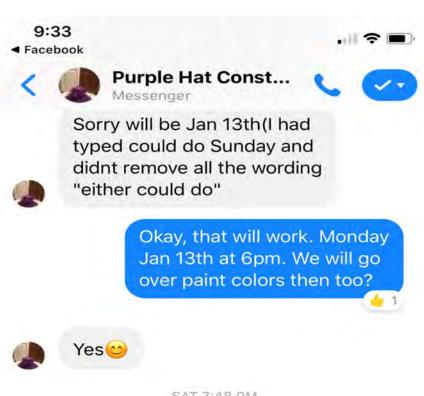
one of the approx 100 shares was posted to a group of women of 14,000 and she had gotten approx 90 plus more to share elsewhere. They were wanting it to go viral... folks didnt even know me but it made for great bullying because of my clearly tacky responses back to her sudden ultimatum. Again that tacky response part is my fault, but her pretending that I was late to set appointments and not telling everyone she did not pay for a certain date whatsoever and pretending I had earned none of the \$1000 was simply misleading the public in knowing the situation. No one knew all the hours I already had in the job and how she had taken up approx 150 labor hours when she booked me out for a spot in January that is virtually impossible to fill in a short amount of time because most people do have strict schedules and have to plan sometimes months in advance. A man Chad Stamps I assumed to be Rachel's husband was on my personal page but I am not sure if Chad Stamps is related to Rachel, but my phone kept notifying Chad was following me and then what appeared to be unfollowing me and then refollowing me bc of my phone kept notifying so again not sure what was going on but it was creepy. The trolls and bullies were telling me to cave in as she would keep asking for her money back as they continued to post lies about me in a very slanderish manner. After unrelenting harrassment from her and her trolls.... I did have a drunk breakdown and clearly sent drunk messages in response to her sending me messages through Venmo requesting payment over and over and Chad following me on my personal page. I was in complete shock that she was not even responding to cop request about no more personal info sharing yet kept encouraging the share of the public post with no deletion of the harrassment. I have never been so scared for my safety and thankfully was able to move.

Rachel mislead the public into acting like I had done no work for her and just ran with her money by allowing the public to be unaware that we had done hundreds of dollars worth of design consulting prior to the dispute and mislead them in thinking she booked with a deadline by posting her comment about me being always late which does happen in Construction but she never had an appointment and saying I was always late and always had excuses which again I picked up a check and we did not book for a set deadline and she assured me of that when she paid the half down and has damaged my business and my public business character in allowing posts under her posts that she asked to be reshared stating I am a druggie amongst so many other harrassments. I would want total resolution of no harrassment and compensation for such and compensation for all my consulting and time. I estimate her approx 100 reshared post containing drug slander was seen by over 50,000 women/men a day in Northwest Arkansas. Which at \$2000 a family for just one project lost is \$100,000 of damages a day I suffered due to her vindictive post that welcomed slander without merit to myself and my company.

Laura Jones Purple Hat Construction LLC

| 12/04/19 | 11:37 PM | Instant Transfer - Card | | Credit to Laura Jones | VISA | • Debit | COMPLETED | -\$990.00 | \$0.00 | Siloam Springs, AR, US 24,248.215.15 - 8682 | 6 |
|----------|----------|-------------------------|----------|--|------|---------|-----------|-------------|------------|--|------|
| | 09:27 PM | Payment From | + | @Eric-Flohr Remodel down payment - F | VISA | Debit | COMPLETED | +\$1,000.00 | \$1,000.00 | Bentonville, AR, US 70.178.236.56 - 4A09 | 6 |
| | 02:19 AM | Payment To | → | @David-Kimbel Dec 4th rent \$950 2426 WV | | Bank | COMPLETED | -\$950.00 | \$0.00 | Fayetteville, AR, US 104.183.71.120 - 8682 | 6 |
| | 02:00 AM | Funding Source Changes | | Default transfer destination changed by user to Card ending in | | | | | | | Venm |
| | 02:00 AM | Instant Transfer - Card | | Credit to Laura Jones | VISA | Debit | COMPLETED | -\$1,390.00 | \$0.00 | Fayetteville, AR, US | 6 |
| | 01:56 AM | Payment From | + | @judand23 Deposit for kitchen cabinet | 盦 | Bank | COMPLETED | +\$1,400.00 | \$1,400.00 | Bentonville, AR, US 98.180.202.216 - 8297 | 6 |

EXHIBIT P



SAT 7:48 PM

I am soooooo sorry.... my landlord that I had just signed a one year lease with needs me to move so he can sell this house. He is needing to cash out fast so I have to move. It will take me two weeks from Monday to be resettled into a new place bc some of the stuff I have belongs to family members out of state so will be moving stuff all over the place plus moving my things. I'm so







Aa











Purple Hat Const... Messenger







moving my things. I'm so sorry but he won't stop bugging me so he must need it sold asap. Part of me wants to stick to the lease ... but "it is what it is" so I'm moving for his sake. I can either refund you or do your project on Jan 27th. It would be too chaotic having projects going on during the moving.... and I wouldn't be able to devote hardly any time bc would be moving and traveling too much.



I'm sorry you are going through this. We will take a refund and maybe revisit later down the road. Hope the move goes well for you.

Thank you.... yes I wanted to stand my ground... but he is a nice guy... so he must really need to sell bad.



I understand. Do you need my



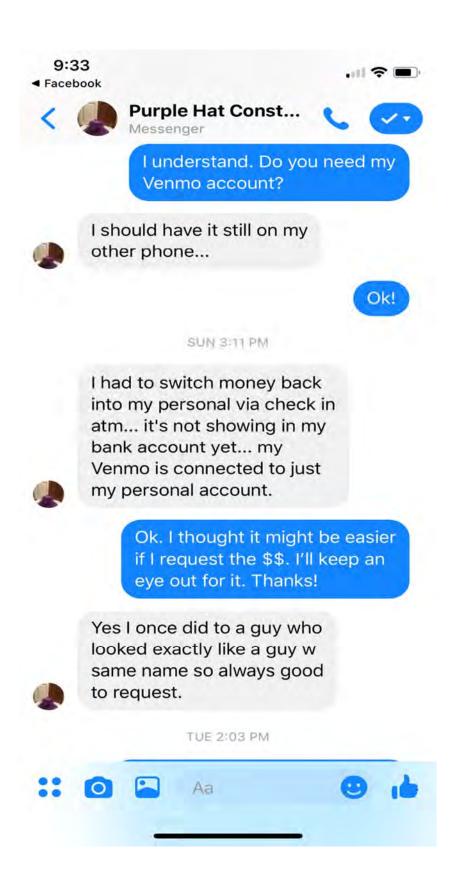


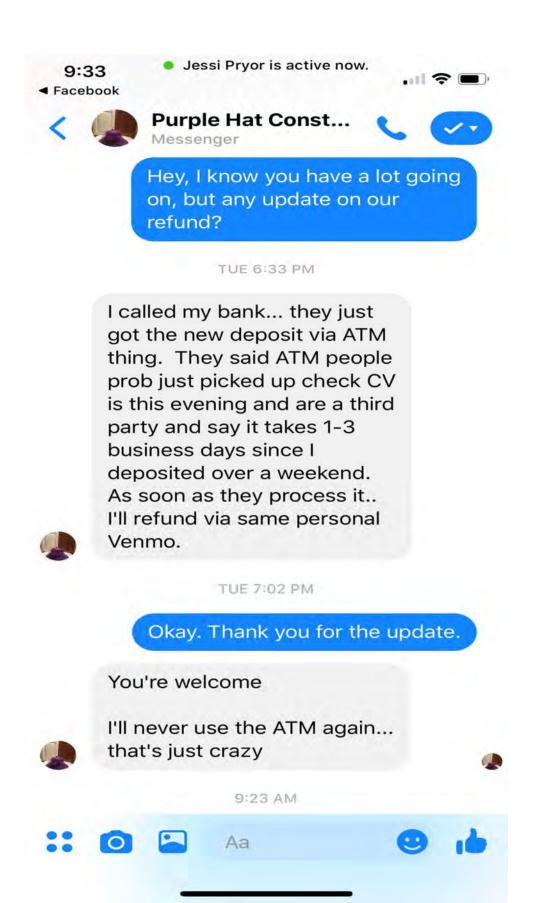














TUE 6:33 PM

I called my bank... they just got the new deposit via ATM thing. They said ATM people prob just picked up check CV is this evening and are a third party and say it takes 1-3 business days since I deposited over a weekend. As soon as they process it.. I'll refund via same personal Venmo.



TUE 7:02 PM

Okay. Thank you for the update.

You're welcome

I'll never use the ATM again... that's just crazy

9:23 AM

Good morning, checking back in for an update on our refund.



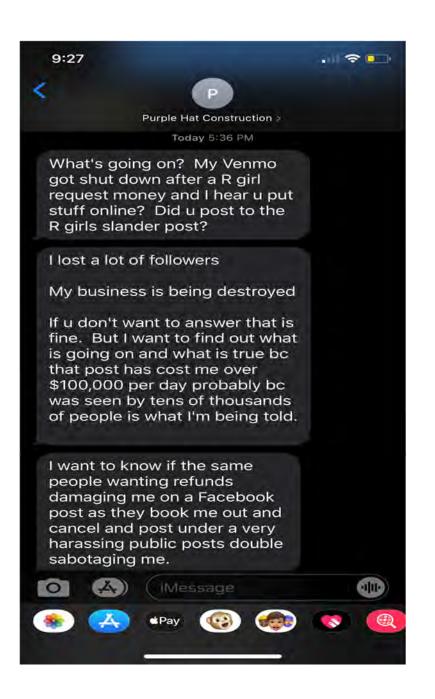


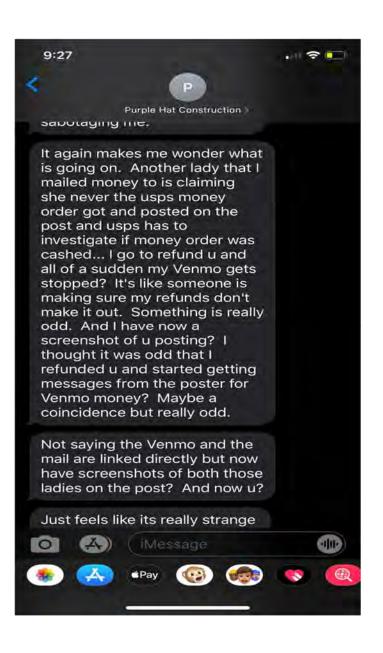


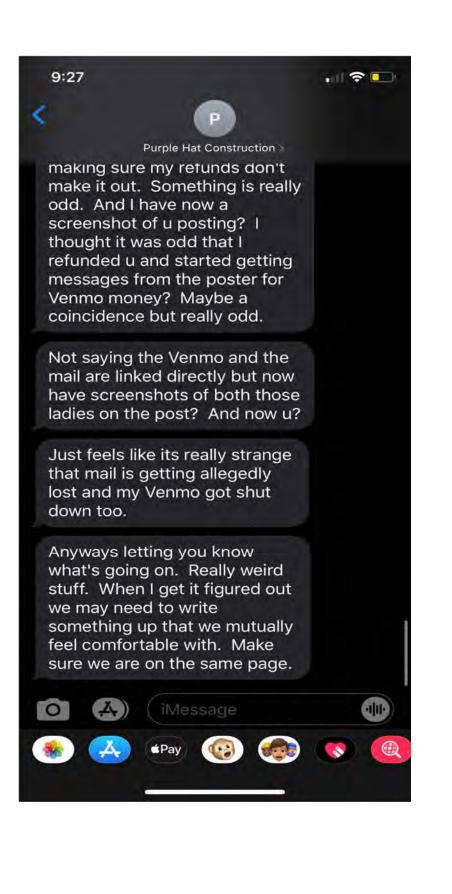
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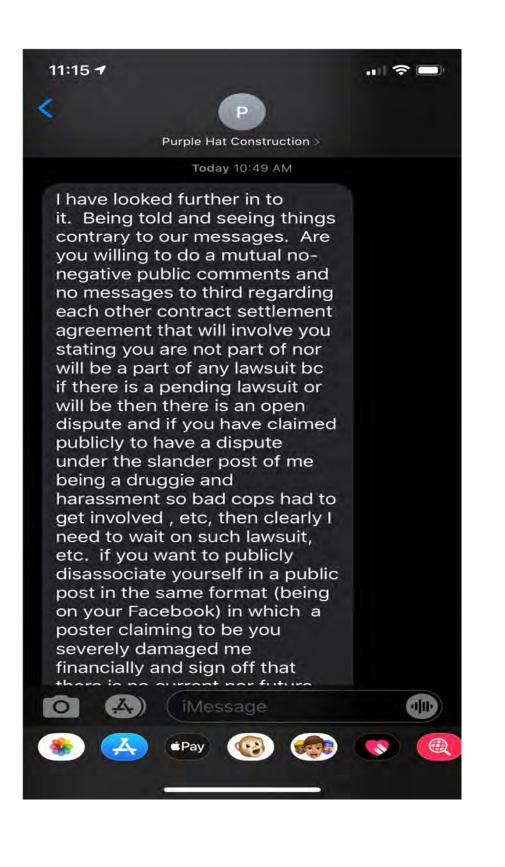


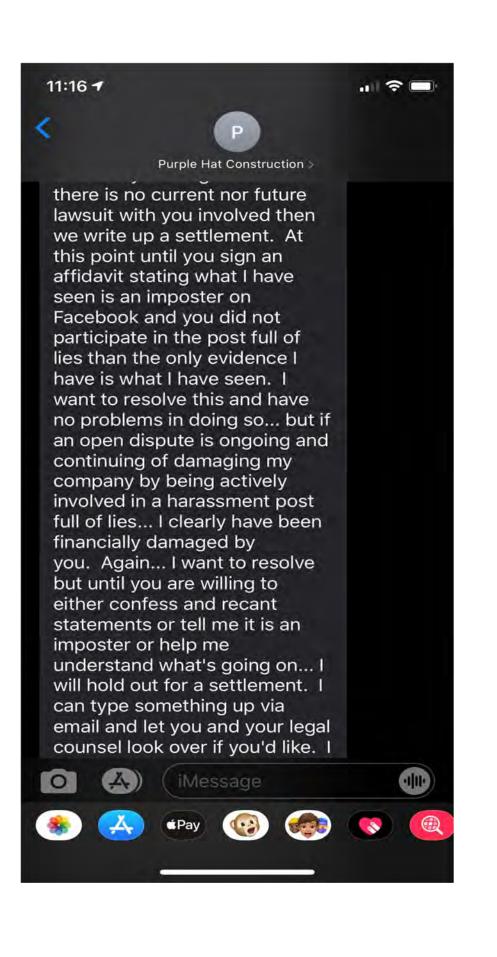


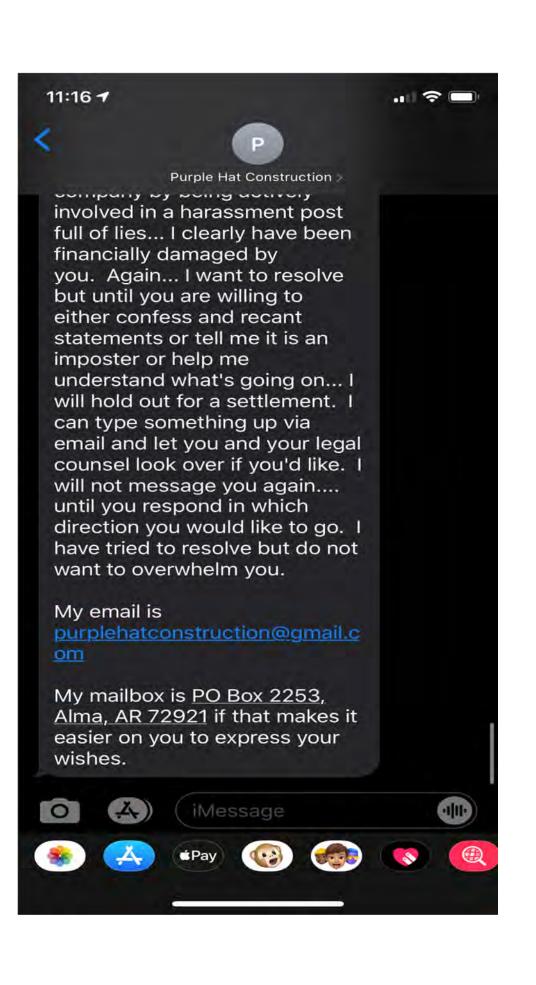












To: Purple Hat Construction

email and let you and your legal counsel look over if you'd like. I will not message you again.... until you respond in which direction you would like to go. I have tried to resolve but do not want to overwhelm you.

My email is purplehatconstruction@gmail.c om

My mailbox is <u>PO Box 2253</u>, <u>Alma, AR 72921</u> if that makes it easier on you to express your wishes.

Our business dealings are done. We received our deposit back. I want no further contact or involvement with you and your company. Please do not contact me anymore.

Delivered



