

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS

O. JULIUS BANANABERRY, ELSPETH
BLUENOSE, WORTHINGTON
FARNSWORTH, and ZBIGINEW
KORWICZSKI

PLAINTIFFS

v.

No. 2009-2321

DIONYSIUS HIPPI

DEFENDANT

COMPLAINT—PUBLIC NUISANCE

O. Julius Bananaberry, Elspeth Bluenose, Worthington Farnsworth, and Zbiginew Korwiczski, by and through their attorneys, bring this action against Dionysius Hipp seeking an absolute injunction to abate a public nuisance and as grounds therefor state:

1. O. Julius Bananaberry, Elspeth Bluenose, Worthington Farnsworth, and Zbiginew Korwiczski are residents of Par Court, Chenal Valley, Little Rock, Arkansas. Chenal Valley is an upscale community with a championship golf course, fine dining, luxurious accommodations, and other amenities. Until July 1, 2009, Chenal Valley was a peaceful and luxurious neighborhood.

2. On July 1, 2009, Dionysius Hipp placed a massive display on his front lawn. The display, entitled “The Horrors of War,” depicted a battle scene that appeared to be from the evening news. Tanks, destroyed hulks of automobiles, partially destroyed buildings, bloody and dismembered mannequins, artillery and other unsightly, frightening, and disgusting objects littered his front yard.

3. At midnight on July 3, 2009, Mr. Hipp began setting off periodic explosions and fireworks. He played sound effects of wars over loudspeakers, and strange smells began to emanate from his home. He projected imagery of war on the side of his house.

4. This massive and outrageous display attracted crowds of viewers, protesters, gawkers, and undesirables.

5. At first, plaintiffs believed that Mr. Hipp would cease this disruption when the Independence Day Holiday ended. To the contrary, it has not ended, and continued up to the date of the signing of this verified Complaint.

6. The massive display constitutes a public and private nuisance, violates the bill of assurances of the neighborhood, has caused a backup of traffic and slow movement of traffic to the area, has attracted many pedestrians to the area, some of whom trespass on the private property of the plaintiffs, has caused many other hardships and inconveniences to the landowners, and has otherwise interfered with the plaintiffs' quiet enjoyment of their property.

7. Plaintiff has ignored and disregarded all entreaties to abate the nuisance, asserting that it is his duty before the gods to protest the horrors of war.

WHEREFORE, plaintiffs seek an order from this Court directing defendant to abate the nuisance, clean up his front yard, mow it every once in a while, and otherwise conduct himself like a human being. Plaintiffs seek costs, fees, and all other just and proper relief.

Respectfully Submitted,

William Compton
COMPTON & STACKHOUSE
Attorneys at Law
RED CROSS BUILDING
Suite 1313
2101 Chiroptera Lane
Little Rock, AR 72201

VERIFICATION

The facts set forth in the above and foregoing Complaint—Public Nuisance, are true and correct to the best of our knowledge and belief.

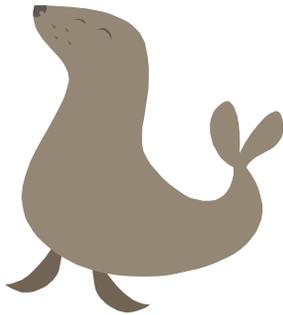
O. Julius Bananaberry
O. Julius Bananaberry

Elsbeth Bluenose
Elsbeth Bluenose

Worthington Farnsworth
Worthington Farnsworth

Zbiginew Korwiczski
Zbiginew Korwiczski

On this Eighth day of July, Year of Our Lord 2009, appeared before me O Julius Bananaberry, Elspeth Bluenose, Worthington Farnsworth, and Zbiginew Korwiczski, satisfactorily proven, and subscribed and swore to the above and foregoing Complaint—Public Nuisance, in my presence, under penalty of perjury .



Elizabeth Montgomery
Elizabeth Montgomery

My commission expires: 2/22/2022