

IN THE DISTRICT COURT FOR THE STATE OF ALASKA AT JUNEAUJOHN FORREST

Plaintiff(s),

vs.

KATHLEEN KALILA TURLEY a/k/aKATHLEEN ADAIR

Defendant(s).

Filed in the Trial Courts
STATE OF ALASKA, FIRST DISTRICT
AT JUNEAU

JUL 27 2015

By [Signature] DeputyCASE NO. 1JU-15-00523 SC

COMPLAINT

Plaintiff ☐ is a corporation that has paid its taxes due the state and filed its required reports.
☒ is not a corporation.

Defendant is indebted to the plaintiff in the principal amount of \$ 5,000.00
 plus interest and court costs as a result of SEE ATTACHED

which occurred at or near _____, Alaska, on
 or about _____
 (month/day/year)

Plaintiff has demanded relief from the defendant, but defendant has failed to comply. Plaintiff requests small claims procedure, gives up the right to a jury trial and formal procedure in this case, and waives all of this claim which exceeds \$10,000. If the court enters an order applying the formal Rules of Civil Procedure rather than the Small Claims Rules to this action, this waiver will be null and void. This action is filed at a court which will not cause unnecessary expense or inconvenience to the defendant and is the court nearest to: (Check applicable boxes.)

- ☐ the residence or place of employment of defendant.
☐ where personal injury or property damage occurred.
☐ where the defendant does or solicits business.

THIS MATTER IS FORMALLY
 ASSIGNED TO
 THOMAS NAVE
 DISTRICT COURT JUDGE

Zane D. Wilson, #9111108 Attorney

Print Name and Title (if applicable)

Plaintiff (Signature)

7-23-15
Date714 4 Avenue, Suite 200, Fairbanks, AK 99701

Mailing Address City State ZIP

907-452-1855

Home Phone

Work Phone

Instructions: If you are filing documents supporting your claim (for example: promissory notes, checks, receipts, bills), you must also attach a copy of each document for each defendant.

John Forrest for his cause of action hereby complains and alleges as follows:

1. Mr. Forrest is a resident of Juneau.
2. The defendant is a resident of Juneau.
3. Venue for this case is proper in Juneau.
4. Mr. Forrest is a trapper who engages in the lawful exercise of trapping within the Juneau area.

5. On or about December 24, 2014, the defendant, without justification or excuse, unlawfully interfered with Mr. Forrest's trapping by springing his traps.

6. The defendant's actions are in violation of AS 16.05.790(a)(1)(B).

7. The actions of the defendant also constitute an unreasonable and tortuous interference with Mr. Forrest's right to engage in lawful trapping without the defendant undertaking action to interfere with that lawful trapping.

8. As a result of the defendant's actions the plaintiff has suffered damages to include those specified in AS 16.05.791, to specifically include punitive damages as necessary to deter the defendant from engaging in these acts in the future.

WHEREFORE Mr. Forrest prays for the following relief:

1. For an entry of judgment against the defendant in an amount reasonably believed to exceed \$5,000.00 the precise amount to be proven at trial.

2. For an injunction to be entered against the defendant enjoining her from engaging in further conduct in violation of AS 16.05.790.

3. For an award of costs and attorney fees to the fullest extent allowed under the law.

4. For such other and further relief as is fair and equitable under the circumstances.