

**IN THE CIRCUIT COURT OF FAULKNER COUNTY, ARKANSAS
DOMESTIC RELATIONS DIVISION**

TIFFANY CHILDERS

PLAINTIFF

v.

NO. 23DR-25-1042

TARYN CHILDERS

DEFENDANT

CITY CORPORATION

PROPOSED INTERVENOR

EXHIBIT 1

**IN THE CIRCUIT COURT OF FAULKNER COUNTY, ARKANSAS
DOMESTIC RELATIONS DIVISION**

TIFFANY CHILDERS

PLAINTIFF

v.

NO. 23DR-25-1042

TARYN CHILDERS

DEFENDANT

CITY CORPORATION

PROPOSED INTERVENOR

INTERVENOR'S COMPLAINT

Intervenor City Corporation, by and through undersigned counsel, and for its Complaint against Tiffany Childers and Taryn Childers, states:

INTRODUCTION

This is a civil action for the recovery of Intervenor's property or the proceeds therefrom based on the misconduct of Defendant Taryn Childers for the benefit of Plaintiff and Defendant.

PARTIES

1. Plaintiff Tiffany Childers is an individual residing in Faulkner County, Arkansas.
2. Defendant Taryn Childers is an individual residing in Arkansas.
3. Intervenor City Corporation is an Arkansas nonprofit corporation.

JURISDICTION

4. Venue is proper in the Circuit Court of Faulkner County pursuant to Ark. Code Ann. § 16-60-101 and § 9-12-303, as a substantial part of the events or omissions giving rise to the claims stated herein occurred in Faulkner County and Plaintiff, claimant in the underlying divorce proceeding, resides in Faulkner County.

5. This Court has subject matter jurisdiction over this proceeding and *in personam* jurisdiction over the parties.

FACTUAL BACKGROUND

6. Defendant Taryn Childers served as City Corporation's Chief Financial Officer from April 23, 2014, until his termination after the launch of an investigation into his misappropriation of hundreds of thousands of dollars of City Corporation's funds.

7. On or around September 10, 2025, City Corporation leadership became aware of multiple suspicious invoices and expenditures by Defendant.

8. The investigation revealed that, during his employment, Defendant utilized City Corporation's credit card for unauthorized personal expenditures, totaling approximately \$202,835.33.

9. Further, Defendant stole items of personal property from City Corporation, including a livestock trailer and livestock, through blatant lies to City Corporation employees about the ownership of the property.

10. City Corporation recovered the trailer and livestock after they were abandoned by the Defendant.

11. Additionally, Defendant fabricated invoices for bogus vendors and sham services to cover his theft of City Corporation's property, worth approximately \$530,543.03.

12. Upon information and belief, Plaintiff and Defendant have utilized the misappropriated funds to purchase both real and personal property and still retain possession over City Corporation's property or items traceable to the proceeds thereof.

13. For example, Plaintiff and Defendant currently have their home listed for sale. Upon information and belief, Proposed Intervenor's property, or the proceeds thereof, was used

for the purchase or improvement of the residence. Proposed Intervenor seeks to protect its interests in the residence and other property in the possession of Plaintiff and Defendant.

**COUNT ONE – FRAUD
(TARYN CHILDERS)**

14. City Corporation incorporates by reference all preceding allegations as if fully set forth herein.

15. Defendant Taryn Childers fabricated various invoices for sham services in order to conceal his misappropriation of City Corporation’s funds.

16. More specifically, Defendant misrepresented the services, amounts, and vendors in the following invoices, for a total of \$530,543.03:

Vendor	Date	Amount
DB Supply	March 8, 2018	\$6,141.00
DB Supply	November 21, 2019	\$4,125.00
DB Supply	March 7, 2024	\$40,000.00
DB Supply	April 17, 2024	\$106,800.00
DB Supply	June 14, 2024	\$49,500.00
Reed’s Family Outdoor Outfitters	February 19, 2020	\$2,699.99
Exodus Endeavors, LLC	March 7, 2021	\$1,600.00
Elite Access Automation, LLC	April 29, 2021	\$17,824.52
DPT Partnership	September 21, 2020	\$32,450.00
DPT Partnership	July 15, 2021	\$5,000.00
Big Ass Holdings	June 8, 2021	\$6,397.88
Big Ass Holdings	December 1, 2021	\$5,443.04

BMW, Inc.	October 27, 2022	\$13,500.00
Ducks Unlimited	April 26, 2022	\$3,000.00
Ducks Unlimited	October 10, 2022	\$2,500.00
Ducks Unlimited	December 8, 2023	\$15,000.00
Ducks Unlimited	February 5, 2024	\$6,700.00
Arkansas Outdoor Concepts	January 14, 2022	\$2,044.13
Sipes, Inc.	September 22, 2022	\$1,350.00
Moonshine Leatherworks	September 14, 2022	\$2,450.00
Tree Docs	May 23, 2023	\$8,500.00
WJR Customs	December 21, 2023	\$13,025.00
Havoc Flats	February 28, 2023	\$9,100.00
Havoc Flats	May 30, 2022	\$4,500.00
Pheasants/Quail Forever	February 21, 2024	\$6,000.00
McMahan Enterprises	July 3, 2024	\$8,500.00
Show Me Birds	February 28, 2023	\$1,900.00
Show Me Birds	February 16, 2024	\$2,200.00
Olive Branch Landscape Management	March 26, 2024	\$25,000.00
Olive Branch Landscape Management	June 16, 2024	\$12,500.00
Andy Jackson d/b/a Absolute Retrievers	July 5, 2024	\$8,460.00
Whiskey Creek Beef (WCB)	September 30, 2024	\$25,000.00
Whiskey Creek Beef (WCB)	January 30, 2025	\$45,000.00
C&B Farm and Outdoors	January 14, 2025	\$6,950.00
Rob Campbell	April 22, 2025	\$8,872.50

3H Tactical and Gunsmithing	May 5, 2025	\$11,219.97
Jimmy Johnson (Ace Acres Retrievers)	August 21, 2025	\$9,200.00

17. Defendant is at least partial owner of DB Supply, DPT Partnership, and Whiskey Creek Beef.

18. Additionally, Defendant wrongfully possessed the personal property of City Corporation by misrepresenting to City Corporation employee, Joey Hanna, that he was the true owner of the property, including but not limited to a livestock trailer and livestock.

19. Defendant put the title of the livestock trailer in his name, despite City Corporation's ownership thereof.

20. Although City Corporation has recovered the trailer and the livestock, it will need to expend further funds on correcting the trailer's title.

21. Defendant knew that his representations regarding the services, vendors, property, and credit card charges were false.

22. The representations were made with the purpose of defrauding City Corporation out of hundreds of thousands of dollars.

23. City Corporation justifiably relied on the invoices created by its CFO in expending the funds at issue.

24. City Corporation is entitled to damages in an amount of at least \$733,378.63.

25. City Corporation is also entitled to punitive damages from Defendant because Defendant knew or ought to have known, in the light of the surrounding circumstances, that his conduct would naturally and probably result in damage and he continued such conduct with malice or in reckless disregard of the consequences from which malice may be inferred.

**COUNT TWO – CONVERSION
(TARYN CHILDERS AND TIFFANY CHILDERS)**

26. City Corporation incorporates by reference all preceding allegations as if fully set forth herein.

27. Defendant misappropriated money as well as personal property of City Corporation during his employment.

28. City Corporation was the owner of and entitled to possess the money and other personal property.

29. Plaintiff and Defendant intentionally took or exercised dominion or control over City Corporation's property in violation of City Corporation's rights by misappropriating the property to their own personal bank accounts and utilizing it for the purchase or improvement of their real and personal property.

30. Accordingly, City Corporation is entitled to damages in the amount of approximately \$733,378.63.

**COUNT THREE – BREACH OF FIDUCIARY DUTY
(TARYN CHILDERS)**

31. City Corporation incorporates by reference all preceding allegations as if fully set forth herein.

32. As an employee and executive of City Corporation, Defendant owed City Corporation the duties of good faith and fair dealing, the duty of loyalty, and to refrain from self-dealing.

33. Defendant breached these duties by acting against the interest of City Corporation to his own benefit and making various misrepresentations to City Corporation and its employees.

34. Defendant's breach was the proximate cause of City Corporation's damages in the amount of approximately \$733,378.63.

**COUNT FIVE – CIVIL CONSPIRACY
(TARYN CHILDERS AND TIFFANY CHILDERS)**

35. City Corporation incorporates by reference all preceding allegations as if fully set forth herein.

36. Plaintiff and Defendant knowingly entered into a conspiracy to deprive City Corporation of its property, including money and personal property, by misappropriating and converting City Corporation property for the benefit of Plaintiff and Defendant.

37. Plaintiff and Defendant's misappropriation and conversion of City Corporation's property was unlawful, oppressive, and immoral.

38. Plaintiff and Defendant's conspiracy resulted in the misappropriation of the property of City Corporation.

39. City Corporation was injured by Plaintiff and Defendant's conspiracy.

40. Plaintiff and Defendant acted with malice or, at a minimum, with reckless disregard for the consequences of their actions.

**COUNT SIX – CONSTRUCTIVE TRUST AND EQUITABLE RELIEF
(TARYN CHILDERS AND TIFFANY CHILDERS)**

41. City Corporation incorporates by reference all preceding allegations as if fully set forth herein.

42. As applicable, City Corporation seeks the imposition of a constructive trust to restore to it, the rightful owner, specific proceeds and identifiable proceeds wrongfully obtained and held by Plaintiff and Defendant and any transferee acting in concert therewith.

43. As stated above, Defendant owed a fiduciary duty to City Corporation arising from his role as Chief Financial Officer. Those duties include the duties of loyalty and good faith and fair dealing, and to refrain from self-dealing.

44. As a result of Defendant's breach, described above, Plaintiff and Defendant have obtained and continue to hold specific property and identifiable proceeds that in equity and good conscience belong to City Corporation, including but not limited to \$733,378.63, and any proceeds thereof.

45. City Corporation's property is specific, identifiable, and traceable to particular accounts and purchases as can be established through discovery.

46. Because Plaintiff and Defendant obtained City Corporation's property through breaches of fiduciary duty, they took such property as constructive trustees of City Corporation and must hold and convey it accordingly.

47. City Corporation requests such interim equitable relief as is necessary to preserve its property pending final judgment, including preliminary injunctive relief, relief enjoining further transfer, encumbrance, or dissipation of its property.

48. Specifically, City Corporation requests that this Court modify the Standing Restraining Order to prevent the disposition of any Marital Property without the approval of the Court and giving Intervenor opportunity to object, even if Plaintiff and Defendant have an agreement regarding the disposition.

JURY DEMAND

49. City Corporation demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

Intervenor City Corporation respectfully requests that:

A. An award of monetary damages resulting from Defendant and Plaintiff's actions described herein;

- B. Modification of the Court's Standing Restraining Order enjoining the disposition of any Marital Property without the approval of the Court and opportunity to object by the Intervenor;
- C. Imposition of a constructive trust on all funds misappropriated to Plaintiff and Defendant and all property traceable to the proceeds thereof;
- B. An award of costs and attorneys' fees and costs in bringing this action;
- C. Punitive damages; and
- D. Such other relief as is deemed just and proper.

VERIFICATION

STATE OF ARKANSAS)
)
 COUNTY OF Pope)

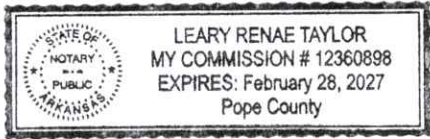
I, Steve Mallett, Jr. CEO of City Corporation., state on oath that the foregoing facts set forth in this Verified Complaint are true and correct to the best of my knowledge, information, and belief.

Steve Mallett

SUBSCRIBED and SWORN to before me, the undersigned notary public, this 24th day of February, 2026.

Leary Renae Taylor
 Notary Public

My Commission Expires:
February 28, 2027



Respectfully submitted,

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