

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS

DIVISION

LINDA IVES and
JEAN DUFFEY

PLAINTIFFS

V. CASE NO. _____

KEITH ROUNSAVALL

DEFENDANT

COMPLAINT

Introduction

This is an action brought by the plaintiffs. Linda Ives and Jean Duffey, against the Defendant and are also seeking equitable relief and injunctive relief as well.

I
Parties

1. The plaintiff Linda Ives is a resident of Saline County, Arkansas.
2. The Plaintiff Jean Duffey is a resident of Harris County, Texas.
3. The Defendant Keith Rounsavall is a resident of Pulaski County, Arkansas.

II
Jurisdiction and Venue

4. This Court has jurisdiction over the parties and the subject matter of this litigation pursuant to Ark. Code Ann. §§ 16-4-101, 16-13-201, and 16-60-104.
5. Venue is proper in this county pursuant to Ark. Code Ann. §§ 16-60-116 and 16-60-104.

III
Background

6. On or about August 23, 1987, Plaintiff Linda Ives' son, Kevin Ives, was murdered in Saline County, Arkansas, along with his friend, Don Henry. Years of local, state, and federal investigations have produced no suspects or indictments. For more than 30 years, Plaintiff Ives has continued the effort to keep the case alive and to bring the murderers to justice.

7. Plaintiff Jean Duffey, was a prosecuting attorney assigned to the drug task force operating in Saline County at the time. Plaintiff Duffey was forced into hiding due to credible reports of a plan to murder her because of the position she took regarding the murders of Kevin Ives and Don Henry. Duffey has remained a close friend and supporter of Ives.

IV Facts

8. Defendant Keith Rounsvall is a private investigator and former detective with the Little Rock Police Department. In early 2017, he became involved in the private investigation of the murders of Kevin Ives and Don Henry. This occurred after a former wrestler, Billy Jack Haynes, contacted the office of United States District Judge Brian Miller regarding Plaintiff Ives' lawsuit against the FBI, the DEA, the U. S. Attorney's Office, and others.

9. Billy Jack Haynes claimed to have information regarding the murders of Kevin Ives and Don Henry. Mr. Haynes was referred to Ives' attorney, R. David Lewis. Mr. Haynes claimed to be at the scene of the murders when they were committed.

10. Defendant offered his services to Plaintiff Ives to pursue Haynes and secure his statement regarding what he knew about the murders. Defendant started a GoFundMe account on Facebook to raise money for his expenses incurred during the investigation of the murders. Plaintiff Ives initially endorsed the GoFundMe account, which was titled ***Help Solve the Murders of Kevin Ives and Don Henry.***

11. Defendant flew to Los Angeles, California, and met up with another private investigator who has also worked on the case. Defendant rented a car and the two of them drove to Oregon to meet with Billy Jack Haynes. During the trip, the other private investigator overheard Defendant take a call from an individual whose name has been mentioned by witnesses and law enforcement as possibly being involved in the crime. It was apparent from the phone call that Defendant does work for this individual.

12. Plaintiff Ives and Plaintiff Duffey stayed in close communication with Defendant and Haynes. Plaintiffs were told about the phone call Defendant took during the trip to Oregon. Plaintiffs eventually began to have reservations regarding Defendant and, because of Defendant's behavior, also reservations about Haynes.

13. In early January, 2019, Plaintiff Ives notified Defendant that she was withdrawing her support for his GoFundMe account and he could no longer use her video to promote it. Ives posted this publicly on Facebook in January, 2019. Defendant began posting defamatory, harmful and false things on Facebook about both Plaintiff Ives and Plaintiff Duffey.

14. In January, 2019, Defendant posted on Facebook that Plaintiff Ives had had a stroke. This is untrue. In the same post and in others, he further states that because of Ives' incapacity, others, such as Jean Duffey, are the ones making decisions for Ives. Defendant reiterates this in other Facebook posts throughout January and February, 2019.

15. Linda Ives has gained nationwide respect because of her strength and her fierce determination to find her son's killer. Defendant's actions were meant to discredit Plaintiff Ives and paint her in a false light in order to derail the investigation into her son's death. If potential witnesses think she is incapacitated, they are less likely to come forward.

16. Defendant also began a public smear campaign against Plaintiff Duffey. In Facebook posts throughout January and February, 2019, Defendant calls Duffey a liar and accuses her of making up bizarre stories, which is false. When Duffey was forced into hiding shortly after the murder of Kevin Ives and Don Henry, Defendant says she was lying about that, which is also false. Duffey is a close friend and supporter of Ives. Duffey has personally interviewed numerous witnesses and gained their trust. Defendant is intentionally trying to ruin Duffey's reputation so that potential reliable witnesses will be less likely to contact her if they think she is not trustworthy.

17. The plaintiffs incorporate by reference the allegations as alleged in paragraphs 8-16 and adopt each as if set out herein word for word.

18. As a direct and proximate cause of the defendant's intentional and egregious conduct, Plaintiff Ives has experienced pain and suffering, humiliation, mental anguish and emotional distress, all to her damage in an amount to be proven at trial.

19. Defendant's intentional conduct has been so egregious as to warrant the imposition of punitive damages.

VI
Count Two

20. The plaintiffs incorporate by reference the allegations as alleged in paragraphs 1-16, and adopt each as if set out herein word for word.

21. As a direct and proximate cause of the defendant's intentional conduct, Plaintiff Duffey has experienced pain and suffering, humiliation, mental anguish and emotional distress, all to her damage in an amount to be proven at trial.

22. Defendant's intentional conduct has been so egregious as to warrant the imposition of punitive damages.

VII
Jury Demand

21. The plaintiff requests that this matter be tried before a fair and impartial jury of twelve (12) qualified citizens.

WHEREFORE, the plaintiffs request judgment over and against the defendant in an amount to be determined by a jury, the imposition of punitive damages, and for all other just and proper relief to which plaintiffs are entitled.

Respectfully submitted,

LINDA IVES and JEAN DUFFEY

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