

Case NO. 13LF-CV00461

William M. Windsor Petitioner

V.
CIRCUIT

Allie Loraine Yager Overstreet,

Mark Supanich, Brenda Williamson.

And John Does 1-1000
MISSOURI

IN THE CIRCUIT COURT

15TH JUDICIAL

LAFAYETTE COUNTY

Mark Supanich Pro Se

1826 Lucky Strike road

Helena Montana 596602

Defendants Answer AND AFFIRMATIVE DEFENSES to
complaint.

Under Missouri court rule 55.27 Defendant Supanich moves the court to take action for the following motions and relief requested.

55.27. Defenses and Objections - How Presented - By Pleading or Motion - Motion for Judgment on the Pleadings

(a) How Presented. Every defense, in law or fact, to a claim in any pleading, whether a claim, counterclaim, cross-claim, or third-party claim, shall be asserted in the responsive pleading thereto if one is required, except that the following defenses may at the option of the pleader be made by motion:

1. Defendant Supanich objects to this entire complaint due to lack of jurisdiction and moves this court to dismiss the complaint

2., to strike all or portions of the complaint, that are vague or ambiguous language in which no relief can be obtained.

3. Defendant Supanich moves this court to take judicial notice that Plaintiff is a public figure. He has injected himself to the forefront of politics. and, as to those who are not pervasively involved in public affairs, they must have "thrust themselves to the forefront of particular public controversies in order to influence the resolution of the issues involved" to be considered a "limited purpose" public figure. *Gertz v. Robert Welch, Inc.* (1974) 418 U.S. 323, 345 Google has even put out a Rip Off Report on the plaintiff and his Lawless America adventure.

A term usually used in the context of libel and defamation actions where the standards of proof are higher if the party claiming defamation is a public figure and therefore has to prove

defamatory statements were made with actual malice. *Harte-Hanks Communications v. Connaughton* (1989) 491 U.S. 657, 666-668.

4. Supanich objects to Plaintiff in part appears to be relitigating *the maids of the mist V. William B. Windsor*. This is the case in which he started lawless America over, suing judges and most court personal he was in contact with on his case. See my motion for judicial notice.

5. Defendant Supanich moves the court to strike the 1000 doe defendants because it prejudices me as far as to any cross claim or to get discovery from.

6. Supanich Moves this court to compel plaintiff to provide his business identity he claims defendant is interfering with contract business relations

7. One of Supanich's affirmative defenses include his first amendment right of freedom of speech. This court can see by Plaintiffs exhibit 555 pages 1-3 that the written words are protected by the 1st amendment, do not threaten or are grounds for a tort claim.

8. Supanich objects and moves this court to compel plaintiff to provide defendants a legal address in which they can have access to due process by serving him when personal service is required. As it is now plaintiff changes motels every few days in many different states. For more than a year. He is recently divorced and has posted on his web pages he no longer a resident of Georgia.

9. Supanich objects and moves this court to strike this entire complaint for failing to state a claim in which relief can be attained.

Defendant Supanich reserves his right to file cross claims for Abuse of Process, Defamation, intentional infliction of emotional distress, fraud, invasion of privacy and interfering with business relations and any civil rights violations he may learn of.

10. Supanich objects to the time frame in which he has had to respond. The complaint is not a short statement of the facts or even a proper complaint. I am not an attorney and had no need to know the Missouri laws before now, since I am not a resident. For a non attorney that alone can take more than thirty days to learn. I have put in my best effort to comply even by, going without sleep for several days at a time, giving up jobs I should be doing and was served the day before my cancer surgery.

11. Supanich objects that plaintiff has brought this suit against him in bad faith, it is frivolous, without merit and Plaintiff comes with unclean hands. He has and continues to post defamatory statements about many people around the country, he stalks them, he gives out personal information including protected medical information on minors as well as adults. Some of the evidence this is attached as exhibit A in the motion for an All Writs injunction

12. Supanich objects that this court did not require plaintiff to post a surety bond to protect the defendants from their losses. Plaintiff in the maids of the mist v windsor case was ordered not to file anymore lawsuits in any court without showing the court order. That order appears to be missing from the docket. Plaintiff was ordered to pay in excess of a half million dollars in legal fees and other costs for being a vexatious litigant that continues to file frivolous claims . Please see motion for judicial notice.

13. Supanich moves this court to compel plaintiff to post a minimum two million dollar bond to protect the defendant's losses before it continues this case.

14. Supanich moves this court to strike plaintiff premature interrogatories, request for production of documents against this defendant and also his newest motion against the court clerk until such time the jurisdiction and or other issues presented here are resolved

15. Supanich also objects to the content in plaintiffs discovery requests of #14 above. Most are privileged communication between attorneys from a 12 years custody battle. Sealed under court order are private medical records of a minor. Consist of aprox two hundred thousand documents and his desire to have them is not only a fishing expedition but to try and prove I may have lied about something so he can" make a special movie about me" The time constraints would take years and he still would not find the "evidence" he seeks, it also has no bearing on this case since I have only known plaintiff for one year.

16. Supanich moves to join defendant Overstreet in her motions to dismiss, and strike

17. Supanich moves this court to have plaintiff provide information on whether Lawless America is a business, non profit, or charitable organization . The complaint appears to be conflicting on this.

Defendants Answers

1. Defendant Supanich Denies, and objects to jurisdiction. See motions to dismiss, motions to, strike

2. Defendant Supanich Denies, and objects to venue. Neither this defendant nor plaintiff nor plaintiffs alleged business have sufficient contacts to the state of Missouri . See motions to dismiss and strike,
3. Denied. object venue is not proper
4. Denied as to defendant supanich
5. Denied as to defendant supanich
6. Denied
7. Denied as to defendant supanich
8. Denied as to is the boyfriend. Admitted as to residence and contact information
9. Without knowledge
10. Without knowledge objection see move to strike 1000 doe defendants in # five affirmative defenses.
11. Objection attempting to relitigate Maids of the Mist case
12. Without knowledge objection scandalous reference
13. Denied as to defendant Supanich .
14. fails to state a claim in which relief can be attained.
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19. fails to state a claim fails to state a claim in which relief can be attained.
20. m in which relief can be attained.

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51. denied as to defendant Supanich
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53. fails to state a claim in which relief can be attained.
54. denied as to defendant Supanich
55. denied as to defendant Supanich
56. fails to state a claim in which relief can be attained.
57. Without knowledge
58. Without knowledge
59. Denied as to Supanich
60. Denied as to Supanich fails to state a claim in which relief can be attained.
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85. Denied as to Supanich fails to state a claim in which relief can be attained.

86. Supanich objects false and misleading slanderous accusation Denied as to Supanich fails to state a claim in which relief can be attained.
87. Denied as to Supanich fails to state a claim in which relief can be attained. Supanich objects to plaintiff sharing false information of a minors medical information
88. Denied as to Supanich fails to state a claim in which relief can be attained. Supanich objects to plaintiff sharing false information of a minors medical information
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93. Denied as to Supanich fails to state a claim in which relief can be attained.
94. Denied as to Supanich fails to state a claim in which relief can be attained.
95. Admitted as to Supanich. fails to state a claim in which relief can be attained.
96. Denied in part admitted in part. The minor was in fact not dead. Supanich moves this court to take judicial notice as to the child was not dead at the time plaintiff posted this information on his web sites As to the bologna sandwich see plaintiffs exhibit 555 pages 1-3 fails to state a claim in which relief can be attained.
97. Denied alive is opposite of dead.
98. Admitted and corrected long before any litigation began see plaintiffs exhibit 555 pages 1-3
99. Denied fails to state a claim in which relief can be attained.
100. Denied. fails to state a claim in which relief can be attained.

101. Admitted in part I posted it, fails to state a claim in which relief can be attained.
102. Denied. fails to state a claim in which relief can be attained.
103. Without knowledge. fails to state a claim in which relief can be attained.
104. Denied as to Supanich. fails to state a claim in which relief can be attained.
105. Denied as to Supanich. fails to state a claim in which relief can be attained.
106. Admitted
107. fails to state a claim in which relief can be attained.
108. fails to state a claim in which relief can be attained.
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113. fails to state a claim in which relief can be attained.
114. fails to state a claim in which relief can be attained.
115. Objection what plaintiff believes is not a fact. fails to state a claim in which relief can be attained. It is defamatory against defendants.
116. fails to state a claim in which relief can be attained.
117. Denied as to Supanich.fails to state a claim in which relief can be attained.
118. Denied as to Supanich . fails to state a claim in which relief can be attained.
119. Denied as to Supanich. fails to state a claim in which relief can be attained.
120. Denied as to Supanich. fails to state a claim in which relief can be attained.
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131. Denied as to Supanich. fails to state a claim in which relief can be attained.
132. Denied as to Supanich. fails to state a claim in which relief can be attained.
133. Denied as to Supanich. fails to state a claim in which relief can be attained. It

establishes no such thing

134. Denied as to Supanich. fails to state a claim in which relief can be attained.
135. Denied as to Supanich. fails to state a claim in which relief can be attained.
136. Denied as to Supanich. fails to state a claim in which relief can be attained.
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158. Denied as to Supanich. fails to state a claim in which relief can be attained
159. Unknown . fails to state a claim in which relief can be attained
160. Denied as to Supanich. fails to state a claim in which relief can be attainedPlease
see exhibit B
161. Denied as to Supanich.
162. Denied as to Supanich. fails to state a claim in which relief can be attained
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164. Denied as to Supanich. fails to state a claim in which relief can be attained
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166. Denied as to Supanich. fails to state a claim in which relief can be attained
167. Denied as to Supanich. fails to state a claim in which relief can be attained
168. Denied as to Supanich. I have not been contacted by any law enforcement other than being served this summons in this case. fails to state a claim in which relief can be attained Denied as to Supanich. fails to state a claim in which relief can be attained
169. Denied as to Supanich. fails to state a claim in which relief can be attained
170. Denied as to Supanich. fails to state a claim in which relief can be attained
171. Denied as to Supanich. fails to state a claim in which relief can be attained
172. Denied as to Supanich. fails to state a claim in which relief can be attained
173. Objection contradicts himself. Denied as to Supanich. fails to state a claim in which relief can be attained as to Supanich.
174. Denied as to Supanich. fails to state a claim in which relief can be attained
175. Denied as to Supanich. fails to state a claim in which relief can be attained
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197. Denied as to Supanich. fails to state a claim in which relief can be attained
198. Denied as to Supanich. fails to state a claim in which relief can be attained.
199. Denied as to Supanich. fails to state a claim in which relief can be attained

Supanich objects to the Plaintiff accusing me. As shown here he has no idea who posted or stole what. Neither does Supanich

200. Denied as to Supanich. fails to state a claim in which relief can be attained
- Supanich objects to the Plaintiff accusing me. As shown here he has no idea who posted or stole what. Neither does Supanich

201. Denied as to Supanich. fails to state a claim in which relief can be attained
Supanich objects to the Plaintiff accusing me. As shown here he has no idea who posted
or stole what. Neither does Supanich
202. Denied as to Supanich. fails to state a claim in which relief can be attained
against supanich
203. Denied as to Supanich. fails to state a claim in which relief can be attained
204. Denied as to Supanich. fails to state a claim in which relief can be attained
205. Denied as to Supanich. fails to state a claim in which relief can be attained.
206. Denied as to Supanich. fails to state a claim in which relief can be attained
207. Denied as to Supanich. fails to state a claim in which relief can be attained
against Supanich
208. Admitted. Objection affirmative defense of truth or corrected statements is not
an actionable offence in which relief can be attained
209. Admitted. Objection affirmative defense of truth or corrected statements is not
an actionable offence in which relief can be attained
210. Denied as to Supanich
211. Denied as to Supanich
212. Denied as to Supanich
213. Denied as to Supanich
214. Denied as to Supanich

215. Denied as to Supanich

216. Denied as to Supanich

217. Denied as to Supanich

218. Denied as to Supanich

219. Objection plaintiff has not shown he has a valid business or sufficient contacts in

this state to bring this action

220. Denied as to Supanich

221. Denied as to Supanich

222. Denied as to Supanich

223. Denied as to Supanich

224. Denied as to Supanich

225. Denied as to Supanich

226. Denied as to Supanich

227. Denied as to Supanich

228. Denied as to Supanich

229. Denied as to Supanich

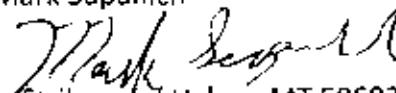
230. Denied as to Supanich

I reserve the right to supplement and or amend these Answers

I am not an attorney and have not had the time or ability to fully understand Missouri court rules So I ask the court to give this pro se defendant a chance to learn the rules or obtain council to make corrections of my pleadings that may be necessary .

I Mark Supanich declare under penalty of perjury in the state of Montana I have answered to the best of my knowledge

Mark Supanich



1826 Lucky Strike road Helena MT 59602

Submitted this 11th day of June 2013

EXHIBIT B

8:53 AM

Lori Overstreet
Are you in DC Mister?

Bill Windsor

Great. No, I am hiding in the basement. I didn't actually say I left... I just wanted folks to think that. My DVD victim has let me down; he hasn't called me back. So I may have to buy a big disc burner once I get the master done. I will not get away now until Saturday after FedEx comes. I plan to arrive in Arlington at noon on Sunday. When do you arrive, and where are you staying again?

Lori Overstreet
Thought so. Ha, I'm getting good at your wording.

I arrive at 4pm Monday. Staying at the skyline Inn across the street from the capitol building. Departing 3pm the 7th.