

IN THE CIRCUIT COURT OF LAFAYETTE COUNTY, MISSOURI  
FIFTEENTH JUDICIAL CIRCUIT

In Re the Matter of: )  
WILLIAM MICHAEL WINDSOR, )  
Plaintiff, )  
v. ) Case No. 13LF-CV00461  
ALLIE L. OVERSTREET, et al. )  
Defendants. )

**RESPONSES TO:  
PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff William M. Windsor ("Windsor") requests that Defendant Allie Loraine Yager Overstreet ("Overstreet") produce for inspection and copying on June 24, 2013 at 1:00 pm at Holiday Inn Express Suites, 19901 E Valley View Pky, Independence, MO 64057 (or at such other place as may be agreed upon), the following documents in the manner required by law and in accordance with the following definitions and instructions.

**INSTRUCTIONS AND DEFINITIONS**

A. Each document request herein seeks all information available to Defendant, her attorneys or agents, and any other person acting on her behalf. Each of the document requests should be deemed continuing in the manner provided by law.

B. If the original of a document is within your possession, custody or control, produce it; if not, produce such a copy of it as is in your possession, custody or control. Any copy of a document on which any notation, addition, alteration or change has been made is to be treated as constituting an additional original document.

C. The term "document" is intended to have the broadest meaning permitted by law

and specifically includes documents in written and electronic form, including but not limited to electronic mail, online messages, and online postings.

D. For the purpose of responding to discovery, the term "you" and derivations of that pronoun shall refer to the responding Defendant.

E. For the purpose of responding to discovery, the term "Windsor" refers to William M. Windsor.

F. Documents should be organized in folders or stacks with the document request number on the top.

Defendant does not provide copies of due to the size of these documents but will make available for inspection at the office of her counsel for inspection between the hours of 10:00 a.m. and 4:00 p.m. Monday through Friday at 521 Walnut, Kansas City, Missouri 64106 (816) 842-1111 the following documents:

14-Meet-Me-In-DC-RSVP-Call-List-2012-01-21  
A-CPD-Invoice-Lawless America-02-06-13  
Copy-of-2-Lawless-Lawless-America-2012-01-20  
Copy-of-4-Lawless-America-Volunteers-2012-01-20  
Meect-Me-In-DC-RSVP-Call-List-2012-01-20  
Meect-Me-In\_DC-RSVP-Call-List-2012-01-21  
Meect-Me-In-DC-RSVP-Call-List-2012-01-21-1  
Movie-Participants-2012-01-10  
Movie-Participants-2012-01-26  
Movie-Participants-2012-01-26-2  
Prod-75-US-House of Respresentatives-Database-2013-02-05  
Prod-75 US Senators-Database-2013-02-05  
US-House of Representatives-database-2012-12-22  
US-Senators-database-2012-12-22

6. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications between you and anyone regarding Windsor or Lawless America.

**RESPONSE:** Defendant objects to this Request in that it is overbroad and burdensome in that it requests information which is private in nature and vague and ambiguous, does Plaintiff request information regarding all communication in all forms with "anyone" which is not reasonably calculated to lead to discoverable evidence.

7. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications between you and all persons known to you who have knowledge of the facts and circumstances alleged in your Complaint for Protective Order.

**RESPONSE:** Attached

8. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications that support your claim that you were entitled to relief against Windsor as alleged in your Complaint for Protective Order.

**RESPONSE:** Attached

9. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications between you and each person with knowledge of your dealings with Windsor or Lawless America.

**RESPONSE:** Attached

10. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications with Windsor, including but not limited to, any and all telephone discussions with Windsor, notes or recordings of oral discussions with Windsor, emails, letters, faxes, or messages sent to or received.

**RESPONSE:** Attached

11. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications between you and anyone to the effect that Windsor or Lawless America are dishonest, operate a "scam," are fraudulent, or are corrupt.

**RESPONSE:** Attached those in my possession

12. All documents relating or referring to, or evidencing, reflecting, constituting, or showing all communications between you and each person that you might have had testify at the hearing on your petition seeking a Protective Order.

**RESPONSE:** Attached

13. All documents relating or referring to, or evidencing, reflecting, constituting, or showing communications, or any other form of publication or information between you and anyone regarding Noah Williamson.

**RESPONSE:** Defendant objects to this Request in that it is overbroad, burdensome, vague and ambiguous Defendant is friends with Noah Williamson's mother and has numerous communications with her regarding Noah of a motherly nature which have no relevance to this litigation, Plaintiff is on a fishing expedition and requesting information which is not reasonably calculated to lead to discoverable evidence.

14. All documents relating or referring to, or evidencing, reflecting, constituting, or showing communications, or any other form of publication or information that Windsor has abused you.

**RESPONSE:** Defendant objects to this Request in that it is overbroad, burdensome, vague and ambiguous, Plaintiff is on a fishing expedition and requesting information which has been previously provided in the ex-parte litigation, without waiving said objection Defendant will provide what information is in her possession.

15. All documents relating or referring to, or evidencing, reflecting, constituting, or showing communications, or any other form of publication or information, messages, postings, articles, recordings, or any other form of publication or information that Windsor's has assaulted you; purposely or knowingly placed or attempted to place you in fear of physical harm; committed battery against you; purposely or knowingly caused physical harm to you with or without a deadly weapon; has committed coercion against you; has compelled you by force or threat of force to engage in conduct from which you have a right to abstain or to abstain from conduct in which you have a right to engage; has harassed you; has engaged in a purposeful or knowing course of conduct involving more than one incident that alarms or causes distress to you and serves no legitimate purpose; that you have suffered substantial emotional distress; that he has followed you about in a public place or places; that he has peered in the window or lingered outside your residence; has sexually assaulted you; that he has caused or attempted to cause you to engage involuntarily in any sexual act by force, threat of force, or duress; he has unlawfully imprisoned you; that he has held, confined, detained, or abducted you against your will; has stalked you; has purposely and repeatedly engaged in an unwanted course of conduct that causes alarm to you when it is reasonable in your situation to have been alarmed by the conduct; has caused you fear of danger of physical harm; has committed a pattern of conduct composed of repeated acts over a period of time that serves no legitimate purpose; has followed you; has sent you unwanted communication; has made unwanted contact.

**RESPONSE:** Will provide information in possession

16. All documents relating or referring to, or evidencing, reflecting, constituting, or showing communications, information, messages, postings, articles, recordings, or any other form of publication or information as to what specific things Windsor's course of conduct that has caused you to be in danger or fear physical harm.

**RESPONSE:** Will provide information in possession

17. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication that Windsor's actions constituting abuse have occurred, have been attempted, or have been or are threatened within the state of Missouri.

**RESPONSE:** Will provide information in possession

18. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about a Facebook page pretending to be Windsor's deceased father.

**RESPONSE:** None

19. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about a Facebook page pretending to be Windsor's deceased mother.

**RESPONSE:** None

20. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about a Facebook page pretending to be Bill Windsor.

**RESPONSE:** None

21. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about the biological father sexually abusing your daughter.

**RESPONSE:** Defendant objects to this Request as it is irrelevant to this instant action involves ongoing litigation in another legal matter, privacy issues involving a minor child and paternity action which is sealed in the State of Missouri and is not reasonably calculated to lead to discoverable evidence.

22. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about sexual activity or alleged sexual activity of any of your children.

**RESPONSE:** Defendant objects to this Request as it is irrelevant to this instant action involves privacy issues involving a minor children and is not reasonably calculated to lead to discoverable evidence.

23. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about Windsor as the victim of stalking, harassment, defamation, libel, slander, and threats.

**RESPONSE:** Attaching those in possession

24. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication that Windsor "bought a gun for use on a group of people."

**RESPONSE:** Attaching those in possession

25. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication between you and Sean Boushie or John Smith.

**RESPONSE:** Defendant does not know Sean Boushie or John Smith will attach documents she believes are relevant

26. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication between you and Claudine Dombrowski.

**RESPONSE:** Defendant does not know Claudine Dombrowski no documents in her possession

27. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication between you and Lorraine Tipton.

**RESPONSE:** Defendant does not know Lorraine Tipton, no documents in her possession

28. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication between you and Shannon Miller aka Elizabeth Hope Hernandez aka Shannon Hernandez.

**RESPONSE: Defendant does not know Shannon Miller aka Elizabeth Hope Hernandez no documents in her possession**

29. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication between you and anyone associated in any manner with <http://joeyisalittlekid.blogspot.com>.

**RESPONSE: None**

30. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication between you and anyone associated in any manner with American Mothers Political Party.

**RESPONSE: None**

31. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about this posting under your name on the Lawless America Facebook page: "That's it? This is your big public ousting? A simple trace on the computer that sent that suicide message, would clear things up. Although I doubt that gets posted. Unblocking me so I can watch the train wreck, yet blocking me from commenting to defend myself is a bit juvenile I think. Tell them, Bill, of the donations receipts. Tell them of the movie and Sundance fiasco. Tell them of the thousands of emails you copied me on. Tell them of the one where you are calling them stupid. Tell them of Homeland Security list Bill, and the filming at the capitol. Tell them how Stacey did send your hard drives back and how you gave permission to use the banner and camera. Tell Dottie what you really think of her. Tell them about Montana and the cops chasing you out of the state. Tell them how many social security numbers you have. Tell them about your database Bill. Tell them about the emails you DONT publish. Tell them about the tv show Bill. Tell them of your bad guy list and why they are on it . Tell them how many times you were in your basement when you you said you were on the road. Tell them about the death threats, or rather, the lack there of. Tell them about the trademark and copywrites Bill. Tell them how you sent me every email you ever sent any of them. Tell them about the meetings with movie agents. Go ahead, tell them. Tell them about your precious spreadsheets with all their personal info Bill. And while you are at it, tell them how to track IP's and proxy's, and how you never should have trusted a woman with brains enough to keep everything you ever said. ...You have made a grave mistake jerking innocent people around for your own midlife crisis. Haters aren't causing you to fail, YOU are causing you to fail. Lying about stupid shit trying to ruin peoples name, just because they dared to not bow correctly to you. Go ahead, trace the computer. I dare you. Tell them where all these criminal charges you have filed are. Tell

them that you knew two weeks before DC we couldnt film in the capitol and that no legislators were coming. Tell them about the two under cover FBI agents in the Senate theater Bill. Tell them how you changed from a regular room to the biggest suite the Crowne had. Tell them how you told me there wont be any movement and you are going to back out. Tell them the timing in which this suicide message appeared. Neh...you won't do that, now will ya. Tell them how many letters you have written to congress Bill. Tell them who actually wrote them . Tell them who does all your work for you. Tell them why your son won't associate his company with Lawless. Tell them how you didn't remember Noah until I told you who he was. Tell them who got Stop the Silence to endorse you. Who got Washington Families United to endorse you. Who got you conference calls with media. Tell them how you forgoynt to copywrite Lawless and asked me what to do. Tell them how you have tens of thousands of unanswered emails. Tell them who did what Bill. I do dare you to sue me and file charges on me. I cannot wait. I will expose the real corruption within Lawless America gladly, and not on faacebook to a bunch of people who believe in you. I hope you do go to the cops, but I know you won't because they already know you well. You are the sick one, for not giving a shit about these peoples stories unless it is good PR for you. You are good at talking sweet but suck at covering your tracks. Bring it on Mr. Windsor, we will see where that suicide message came from and we will blow you wide open for all your lies and using these folks vulnerabilities to your advantage. I am not your average lemming and lying about me to publicly and maliciously discredit my name was a big mistake."

**RESPONSE:           None in possession**

32.     All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about this posting under your name on Facebook: "Windsor posts things that he know are false...and that he has lost his mind."

**RESPONSE:           None in possession**

33.     All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication that Windsor posted the death notice posting about Noah Williamson or that Windsor has ever posted knowingly false information.

**RESPONSE:           Attached those in possession**

34.     All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about this posting under your name on Facebook: "Windsor is a liar and "make[s] shit up."

**RESPONSE:           Attached those in possession**



35. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about this posting under your name on Facebook that says Windsor duped people.

**RESPONSE:** Attached those in possession

36. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication about you encouraging people to leave Lawless America.

**RESPONSE:** None

37. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication that Windsor published a fake copy of criminal charges against you online to 50,000 people.

**RESPONSE:** Attached

38. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication that you did not commit perjury when you sought an Ex Parte Order of Protection against Windsor in the 15<sup>th</sup> Judicial Circuit Court, Lafayette County, Missouri.

**RESPONSE:** Attached in possession

39. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding your claim that you quit Lawless America when you saw Windsor stalking other parents.

**RESPONSE:** Attached

40. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding your claim that: "Bill Windsor threatens to show up to my April 1 court hearing with cameras and says he has a gun and published my address."

**RESPONSE:** Attached

41. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding your claim that: "...since I quit Lawless America, he has threatened me publicly on his website, told lies about me, emailed me threats, brags about a gun, published my address and told others to stalk me, and says he will come here April 1 to this courthouse to sabotage my custody hearing."

**RESPONSE: Attached**

42. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding your claim that: "William Windsor has repeatedly published on his website that he has bought a gun for use on a group of people. He lists that group of people and I am one."

**RESPONSE: Attached**

43. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding your claim that: "he keeps publishing my kids actual address on line and encouraging people to get personal info on me..."

**RESPONSE: Attached**

44. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding your claim that Windsor has personal property of yours, namely a video film.

**RESPONSE: Attached**

45. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication to explain why you have any right to interfere with Windsor's rights under the First Amendment to the United States Constitution.

**RESPONSE: Attached those in possession**

46. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding any cease and desist notices published by Windsor in an attempt to stop you from making contact and defaming Windsor.

**RESPONSE: Attached those in possession**

47. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor' published request for retractions from you.

**RESPONSE:** Attached those in possession

48. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication with anyone or anything regarding anything whatsoever related to your Petition for Order of Protection, Windsor's responses and actions thereto, and the hearing on the Petition.

**RESPONSE:** Attached those in possession

49. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor unblocking you on Facebook yet blocking you from commenting on Facebook.

**RESPONSE:** Attached those in possession

50. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding anything Windsor has ever done improperly with donations receipts.

**RESPONSE:** Attached those in possession

51. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor being involved in a movie fiasco.

**RESPONSE:** Attached those in possession

52. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor being involved in a Sundance fiasco.

**RESPONSE:** Attached those in possession

53. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding the thousands of emails that you say you were copied on by Windsor.

**RESPONSE:** Attached those in possession

54. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding emails where Windsor has called people stupid.

**RESPONSE:** Attached those in possession

55. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor preparing a Homeland Security list.

**RESPONSE:** Attached those in possession

56. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor doing anything improper regarding filming at the Capitol.

**RESPONSE:** Attached those in possession

57. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Stacy Slaton and hard drives.

**RESPONSE:** Attached those in possession

58. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor giving permission to use a banner.

**RESPONSE:** Attached those in possession

59. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor giving permission to use a camera.

**RESPONSE:** Attached those in possession

60. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor social security number(s).

**RESPONSE:** Attached those in possession

61. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding claims that Windsor was in his basement when he said he was on the road.

**RESPONSE: Attached those in possession**

62. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding threats to Windsor by anyone.

**RESPONSE: Attached those in possession**

63. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Lawless America trademarks.

**RESPONSE: Attached those in possession**

64. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Lawless America copyrights.

**RESPONSE: Attached those in possession**

65. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor sending every email he ever sent to you.

**RESPONSE: Attached those in possession**

66. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor having or not having meetings with movie agents.

**RESPONSE: Attached those in possession**

67. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor jerking innocent people around for his own midlife crisis.

**RESPONSE: Attached those in possession**

68. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor lying about "stupid shit" trying to ruin peoples' names.

**RESPONSE: Attached those in possession**

69. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor ever knowingly lying about anything in regard to Lawless America.

**RESPONSE: Attached those in possession**

70. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor filing criminal charges with several law enforcement authorities.

**RESPONSE: Attached those in possession**

71. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor knew two weeks before Meet Me in DC that filming could not be done in the capitol.

**RESPONSE: Attached those in possession**

72. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor knowing two weeks before Meet Me in DC that no legislators were coming.

**RESPONSE: Attached those in possession**

73. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor changing from a regular room to the biggest suite that the Crowne Plaza National Airport Hotel had.

**RESPONSE: Attached those in possession**

74. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor did not write letters sent to Congress.

**RESPONSE: Attached those in possession**

75. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor not being the one who does his work.

**RESPONSE: Attached those in possession**

76. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor not remembering Noah Williamson, and you having to tell Windsor who he was.

**RESPONSE:** Attached those in possession

77. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Stop the Silence endorsing him.

**RESPONSE:** Attached those in possession

78. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Washington Families United to endorsing him.

**RESPONSE:** Attached those in possession

79. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding anyone ever arranging conference calls for Windsor with media.

**RESPONSE:** Attached those in possession

80. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor forgetting to copyright Lawless America.

**RESPONSE:** Attached those in possession

81. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor asking you what to do regarding copyrights.

**RESPONSE:** Attached those in possession

82. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding corruption within Lawless America.

**RESPONSE:** Attached those in possession

## DOCUMENT REQUESTS

1. All documents relating or referring to, or evidencing, reflecting, or constituting communication to or from Windsor.

**RESPONSE:** Defendant objects to this Request in that it is overbroad and burdensome in that much of the communication between the Plaintiff and Defendant could be constituted as chit chat and not reasonably calculated to lead to discoverable evidence.

2. All documents relating or referring to, or evidencing, reflecting, or constituting printouts of web pages of or about Windsor or Lawless America.

**RESPONSE:** Defendant objects to this Request in that it is overbroad and burdensome and not reasonably calculated to lead to discoverable evidence.

3. All documents relating or referring to, or evidencing, reflecting, or constituting confidential information provided to you by Windsor or Lawless America.

**RESPONSE:** Attached

4. All documents relating or referring to, or evidencing, reflecting, or constituting all work schedules, time sheets, and records showing dates and times worked by you in 2011, 2012, and 2013.

**RESPONSE:** Defendant objects to this Request in that it is vague and ambiguous in that it is unclear as to specifically what the Plaintiff is requesting whether it be information from the Defendant's volunteer work or her employment which would be irrelevant in this litigation and not reasonably calculated to lead to discoverable evidence.

5. All documents relating or referring to, or evidencing, reflecting, constituting, or showing telephone calls by you in 2011, 2012, and 2013.

**RESPONSE:** Defendant objects to this Request in that it is overbroad and burdensome in that it requests information which is private in nature and vague and ambiguous, does Plaintiff request information regarding telephone calls specifically to him and his organization or all of Defendant's personal telephone records which is not reasonably calculated to lead to discoverable evidence.



83. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding the "cops" knowing Windsor well.

**RESPONSE:** Attached those in possession

84. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor is sick.

**RESPONSE:** Attached those in possession

85. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor not giving "a shit" about peoples' stories unless it was good PR for him.

**RESPONSE:** Attached those in possession

86. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor needing to cover his tracks or covering his tracks.

**RESPONSE:** Attached those in possession

87. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor using people's vulnerabilities to his advantage.

**RESPONSE:** Attached those in possession

88. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding Windsor lying about you.

**RESPONSE:** Attached those in possession

89. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding psych evaluations of you.

**RESPONSE:** Defendant objects to this Request as it requests information of a private protected nature under Federal Law and does not lead to information reasonably calculated to obtain discoverable evidence.

90. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication regarding court orders in any matters involving Stewart Dierking.

**RESPONSE:** Defendant objects to this Request as it requests information protected under privacy acts and information concerning other individuals whom the Defendant does not have the right or authority to provide information concerning and does not reasonably lead to information calculated to obtain discoverable evidence.

91. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication that relates to the claims you made to Windsor when you were filmed by Lawless America.

**RESPONSE:** Defendant objects to this Request as it requests information involving a minor child which is private and protected information and does not reasonably lead to information pertinent to this litigation and not calculated to lead to discoverable evidence.

92. All documents relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication, information, or communication that relates to police reports made by you.

**RESPONSE:** None in my possession

STATE OF MISSOURI                    )  
  )  
COUNTY OF JACKSON            )

The below-named person, being first duly sworn, affirms the responses to request for production of documents true to the best of affiant's knowledge, and belief.

Allie Overstreet  
Affiant, ALLIE OVERSTREET

Subscribed and sworn to before me this 3rd day of June, 2013.

Theresa L Yount  
Notary Public


My Commission Expires:



THERESA L YOUNT  
My Commission Expires  
January 24, 2016  
Platte County  
Commission #12437494

Respectfully Submitted,

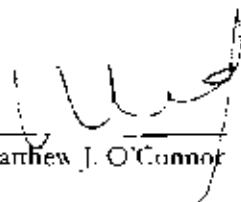
THE O'CONNOR LAW FIRM, P.C.

by:   
Matthew J. O'Connor, #41834  
571 Walnut Street  
Kansas City, Missouri 64106  
Telephone: (816) 842-1111  
Facsimile: (816) 842-3322  
mjoc@workingformstucc.com  
ATTORNEY FOR DEFENDANT

**Certificate of Mailing**

The undersigned does hereby certify that a copy of the above and foregoing was mailed via United States Mail, postage prepaid this 3<sup>rd</sup> day of June 2013 to:

William M. Windsor  
3924 Lower Roswell Road  
Marietta, Georgia 30068

  
Matthew J. O'Connor