

CASE NO. 13LF-CV00461

William M. Windsor	§	IN THE CIRCUIT COURT
	§	
Plaintiff,	§	
	§	
v.	§	
	§	15th JUDICIAL CIRCUIT
Allie Loraine Yager Overstreet,	§	
Mark Supanich, Brenda Williamson	§	
And John Does 1-1000,	§	
	§	
Defendants	§	LAFAYETTE COUNTY, MISSOURI

THIRD AFFIDAVIT OF WILLIAM M. WINDSOR

DATED JULY 15, 2013

I, William M. Windsor, the undersigned, hereby declare under penalty of perjury:

1. I am over the age of 21, am competent to testify, and have personal knowledge of the matters stated herein. I provide this affidavit to be used in this matter and in any other legal proceeding.

2. ATTORNEY O'Connor DID NOT FILE AN ENTRY OF APPEARANCE in this civil action.

3. On May 30, 2013, an attorney purportedly acting for DEFENDANT ALLIE LORAIN YAGER OVERSTREET (“DEFENDANT”) filed a MOTION TO STRIKE PLEADINGS and a MOTION TO DISMISS AND INCORPORATED SUGGESTIONS IN SUPPORT.

4. On June 3, 2013, an attorney purportedly acting for DEFENDANT ALLIE LORAIN YAGER OVERSTREET (“DEFENDANT OVERSTREET”) filed Certificates of Service of Discovery Responses.

5. Local Rule 21.2 requires that attorneys file an Entry of Appearance. No such Entry of Appearance has been served on me, and no such Entry of Appearance is shown on the Court Docket.

6. All filings purportedly on behalf of DEFENDANT OVERSTREET by Matthew J. O’Connor or the O’Connor Law Firm should be stricken due to the fact that Matthew J. O’Connor and the O’Connor Law Firm failed to file an appearance and cannot be recognized by this Court.

7. The DEFENDANT FAILED TO ANSWER THE VERIFIED COMPLAINT.

8. The VERIFIED COMPLAINT was filed on April 29, 2013.

9. On May 29, 2013, 2013, an attorney purportedly acting for DEFENDANT OVERSTREET filed what is titled as an ANSWER TO THE VERIFIED COMPLAINT.

10. The so-called ANSWER TO THE VERIFIED COMPLAINT was neither filed by DEFENDANT OVERSTREET nor an attorney who had filed an Entry of Appearance to represent her. I was never served with an Entry of Appearance, and the attorney who filed the so-called ANSWER did not respond to emails from me regarding discovery and other matters.

11. THE IMPROPERLY FILED ANSWER IS DISHONEST.

12. The so-called ANSWER could best be described as a despicable effort to circumvent the rules of civil procedure, defraud the Court, and deny justice to me. I filed a VERIFIED COMPLAINT in which I swore that everything stated in the VERIFIED COMPLAINT was true and correct and based upon my personal knowledge. It was signed under oath before a notary. 26 exhibits were attached, many of which I know DEFENDANT OVERSTREET was familiar with.

13. Yet, the so-called ANSWER to paragraphs 11, 12, 14-34, 38-57, 60, 63-72, 74, 76, 77, 79, 82, 84, 87-201, in the VERIFIED COMPLAINT was: “Defendant states she is without sufficient knowledge or information to form a belief as to the truth of the allegations....”

14. This dishonest so-called ANSWER includes facts sworn to by me about which DEFENDANT OVERSTREET definitely had knowledge and information, such as:

- a. 60. After Meet Me in DC, Overstreet seemed to become obsessed with <http://Joeyisalittlekid.blogspot.com>, a site directed at the I that the PLAINTIFF considers to be a hate site. Overstreet kept sending Facebook messages and emails about it to the PLAINTIFF. While Overstreet was regularly sending the I postings by haters, she wanted the I to stop mentioning them
- b. 115. Upon information and belief, Overstreet sent the death notice message to the PLAINTIFF or conspired with someone to send it.
- c. 119. At approximately 3:00 am on February 23, 2013, a posting appeared on the Lawless America Facebook page from the account of Overstreet. [A true and correct copy of this message reviewed by the PLAINTIFF is attached as Exhibit 521.]
- d. 141. Overstreet responded with a message that was false. [A true and correct copy of this message received by the PLAINTIFF is attached as Exhibit 509.]

- e. 143. Overstreet continued to post false messages about the PLAINTIFF on Facebook.
- f. 144. Overstreet lied numerous times in Facebook postings.
- g. 145. At approximately 5:00 pm on Saturday, September 23, 2013, Overstreet posted this 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 forgoymt 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.” [A true and correct copy of this message is attached as Exhibit 531.]

- h. 191. When you compare several of Overstreet's Posts, it seems to show that her strategy with this death notice scam is to claim that the PLAINTIFF posted knowingly false information.
- i. 192. Overstreet has posted a harassing, libelous, slanderous Facebook post in which she says Windsor is a liar and “make[s] shit up.”
- j. 195. Overstreet has posted a harassing, libelous, slanderous Facebook post in which she says the PLAINTIFF duped people.
- k. 197. Overstreet has posted a harassing, damaging Facebook posting in which she encouraged people to leave Lawless America.

15. These, and other paragraphs in the VERIFIED COMPLAINT, are all matters that DEFEDANT OVERSTREET has sufficient knowledge and information to answer.

16. DEFENDANT OVERSTREET denied eight of the 195 paragraphs in the VERIFIED COMPLAINT that I swore were true and correct based upon my personal knowledge.

17. DEFENDANT OVERSTREET FAILED TO RESPOND TO INTERROGATORIES.

18. On May 7, 2013, I served PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT ALLIE LORAIN YAGER OVERSTREET. On May 7, 2013, I sent the Certificate of Service to the Clerk of the Court for filing.

19. On June 3, 2013, I received what is purported to be "ANSWERS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT ALLIE LORAIN YAGER OVERSTREET." But these so-called "ANSWERS" were not filed by the DEFENDANT nor were they filed by an attorney with an Entry of Appearance on file with the Court. Therefore, there is no response to the PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT ALLIE LORAIN YAGER OVERSTREET.

20. Furthermore, even if these so-called "ANSWERS" were considered to be properly filed, there are no answers. DEFENDANT OVERSTREET did not answer a single interrogatory.

21. The attorney who filed the so-called ANSWERS has ignored the PLAINTIFF'S emails about the discovery problems.

22. I have filed a MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND MOTION FOR SANCTIONS AGAINST DEFENDANT ALLIE LORAIN YAGER OVERSTREET, referenced and incorporated herein as if attached hereto.

23. DEFENDANT FAILED TO RESPOND TO DOCUMENT REQUESTS.

24. I have filed a MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND MOTION FOR SANCTIONS AGAINST DEFENDANT ALLIE LORAIN YAGER OVERSTREET, referenced and incorporated herein as if attached hereto.

25. This MOTION explains that DEFENDANT OVERSTREET failed to produce anything but four documents that properly responded to the REQUEST FOR PRODUCTION. The document production is truly a joke.

26. DEFENDANT FAILED TO APPEAR FOR SCHEDULED DEPOSITION.

27. DEFENDANT OVERSTREET was noticed for a deposition. [A true and correct copy of the Notice of Deposition is attached as Exhibit B hereto.]

28. DEFENDANT OVERSTREET did not appear for the deposition. [A true and correct copy of the transcript of the deposition is attached as Exhibit C hereto.]

29. I believe the alleged attorney for DEFENDANT OVERSTREET lied to me claiming Overstreet had a prior commitment and that he had a hearing on Monday. I requested an explanation of the alleged commitment that took precedence over a legal obligation as well as the court, judge, and case number of the claimed hearing. The attorney's office ignored the request and did not reply with alternate dates, and the attorney similarly ignored the request. [A true and correct copy of the emails with the attorney's office are attached as Exhibit A hereto.] Then this unscrupulous attorney had the audacity to file a motion for a protective order and gag order in which he lies to the Court. It is a false pleading. The pleading contains the following easily-proven lies by attorney O'Connor:

- a. "Defendant provided her responses on or about June 3, 2013 with documents, which numbered over 1700 pages...." [This is a lie. The documents have been filed with the Court, and only 1,255 pages of documents were produced gross, almost half were

duplicates, and only three documents even came close to being produced as required by the Rules.]

- b. "PLAINTIFF served upon Defendant a Second Request for Production of Documents requesting all of her computer and electronic equipment owned or used by Defendant for the past three (3) calendar years to be produced for inspection and forensic evaluation, such a production puts an undue burden, expense and oppression upon Defendant." [This is not an undue burden. The undue burden is when a serial liar like DEFENDANT OVERSTREET and an unscrupulous attorney like O'Connor do everything they can to avoid discovery.]
- c. "PLAINTIFF is systematically performing a method of harassment, annoyance, embarrassment, and oppression through this Court by constant discovery." [Utterly ridiculous. I submitted Interrogatories, Requests for Production of Documents, and noticed a deposition. When the documents provided were nothing but a joke, I simply instructed DEFENDANT OVERSTREET to bring those same documents to the deposition as it seemed it would be necessary to go through every page for an explanation.

When it became clear that DEFENDANT OVERSTREET would simply lie and conceal documents, the only solution was to file a second document request for a forensic examination of her electronic devices. This woman may be unprecedented as a liar. The ONLY way to have a hope of getting what she has is through computer forensics. I do not believe this woman could tell the truth if her life depended upon it. The Rules provide for interrogatories, requests for production of documents (with no limits as to the number of requests allowed), and depositions. That is all I have filed. I am yet to file Requests for Admissions, but those will be forthcoming. I am filing a Motion for Sanctions against O'Connor as well as a complaint with the Missouri Bar Association.]

- d. "Counsel's office contacted PLAINTIFF through his preferred method of communication, email, and indicated that Defendant would not be available on a Sunday for Deposition and that the deposition should take place during normal business hours. PLAINTIFF responded with Monday, July 15, 2013 at 9:00 a.m. Counsel's office indicated that Counsel is unavailable on that

date and time and requested that PLAINTIFF provide other options for review against Counsel's schedule. [While the above is factual, it leaves out the most important bits. I politely requested an email explaining what previous commitment by DEFENDANT OVERSTREET existed, and how could it take precedence over a legal matter as well as the name of the court, judge, and case number for the alleged hearing that would keep O'Connor from a Monday deposition start. O'Connor's firm ignored the requests. A true and correct copy of the emails with the attorney's office are attached as Exhibit A hereto.]

- e. "Additionally, PLAINTIFF has created a website www.allieoverstreet.com with the express purpose to document the instant action and has downloaded all documents filed with the Circuit Court of Lafayette County onto said website, including photographs of the Defendant and other information with the express purpose of harassment annoyance, embarrassment and oppression attached hereto Defendant's Exhibit 'A'." [The website says nothing whatsoever about the "express purpose" being to document the instant action. The website says nothing whatsoever

about the “express purpose” being to harass, annoy, embarrass, and oppress. The purpose is expressed as an expose of a serial liar. The website would have never existed if DEFENDANT OVERSTREET had not lied again and again and again in published statements on the Internet in an effort to damage the I. The facts are irrefutable. I have massive evidence, with much more expected to come from discovery. I have not downloaded any documents. The photos used on the website are photos that the I own and have a signed release from DEFENDANT OVERSTREET to that effect. I am a journalist. I began working in radio and television news in high school in 1965 and 1966. I continued working in radio news in 1967 and 1968. In 1969, I worked as a television news show host, and on July 16, 1969, I was in the VIP press corps for the Apollo 11 launch. My father and I were two of a small group of press who were at the area where the astronauts took their last steps on land as they were transported to the spacecraft. Between the years 1972 and 1976, I published a newsletter for the U.S. Army’s 143rd Transportation Brigade. In 1977, I launched my first magazine; I was the editor

and publisher. Once I could afford to hire an editor, I worked solely as the publisher, the senior position in a publishing company. I started up and acquired other magazines. Then I became a magazine consultant for others. I did consulting for a group of approximately 25 magazines, and I became the president of that publishing company, and I brokered the sale of that business in 1987. In 1988, I started another publishing company that launched three magazines. In 1992, I was recruited to be the head of a group of magazines and technical conferences published all over Europe. I believe there were about 10 magazines there and at least that many conferences. In 1994, I was made president of a trade show and conference company owned by Goldman Sachs. I was also made a vice-president of the publishing division of the company that had approximately 60 magazines. In 1997, I became CEO of a company that produced trade shows and conferences – as many as 100 a year. That business was sold in three transactions, and I left in April 2001 after the last sale was consummated to The Washington Post. From 1977 to 2001, I was either president, vice-president, editor, or publisher of

approximately 100 publications, and I was director, president, or CEO of hundreds and hundreds of trade shows and conferences. Since 2001, I have operated various websites, always publishing news and information. I created LawlessAmerica.com as an online magazine, radio, and TV show. The name was obtained in 2007, and I believe the first news article was published in 2008, though 2010 was when the website started to add a lot of content. There have been approximately 1,300 articles written and published by me on the website plus extensive database entries by me and others. The website shows this as the header: LAWLESS AMERICA: Magazine, Radio, TV, Motion Pictures. I produced and recorded approximately 100 online radio shows in 2011 and 2012 before I stopped while I am traveling filming documentaries. I also produced an unknown number of online TV shows. I maintain the Lawless America channel on YouTube. I have published over 1,500 videos there. I also have the Lawless America channel on Livestream, a newsmagazine streaming video website. On June 14, 2012, I left on a 241-day trip to 49 of the 50 states, and I conducted interviews that were filmed with over 1,000

people. I departed again on or about April 1, 2013, and I have been traveling and filming ever since. I am a card-carrying member of the press. I am currently in production of three documentary films that will feature DEFENDANT OVERSTREET. I am protected by the Constitution and the Bill of Rights under Freedom of Speech and Freedom of the Press. I hope DEFENDANT OVERSTREET will keep her lying mouth shut when she starts to libel, slander, defame, harass, cyberstalk, and damage the next potential victim.

- f. “When Counsel refused to provide confidential work product information as to the names of client's and scheduling conflicts I became agitated and rude accusing Counsel's staff of lying and Counsel of trying to avoid the deposition.” [This is outrageously false. The name of a court, judge, and case number are not confidential work product information. I most definitely accused O'Connor and his staff of lying. DEFENDANT OVERSTREET didn't have any commitment that would qualify to avoid a deposition, and I doubt seriously that O'Connor had a hearing. Let's put them on the stand and find out.]

30. The pleadings of DEFENDANT OVERSTREET should be stricken due to a failure to appear for her deposition. I also ask that my mileage, hotel bills, court reporter fees, and photocopy expense be reimbursed.

31. So, DEFENDANT OVERSTREET failed to produce any documents at the place and time established, produced essentially no documents by mailing three manila envelopes, duplicated 421 of the documents, provided only three documents that seemed to even come close to meeting the requirements of the rules, produced documents that were unreadable, most without dates, and on and on; refused to answer interrogatories, filed a false pleading as an answer; refused to appear for her scheduled deposition; and then her alleged attorney files a motion filled with lies about the discovery. DEFENDANT OVERSTREET is the same person who filed an absolutely bogus application for a protective order in which she swore under oath that I had repeatedly published that I had bought a GUN FOR USE ON A GROUP OF PEOPLE, INCLUDING HER. Judge Frerking seemed indignant when he realized that she had lied to him.

32. DEFENDANT OVERSTREET is the same person who had lied, libeled, slandered, defamed, and cyberstalked me significantly. I believe DEFENDANT OVERSTREET'S counts of defamation will easily exceed 100. All of these can be easily proven to be lies.

FURTHER SAITH AFFIANT NOT.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of July 2013.

A handwritten signature in black ink, appearing to read "William M. Windsor", written in a cursive style.

William M. Windsor

VERIFICATION

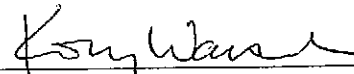
Personally appeared before me, the undersigned Notary Public duly authorized to administer oaths, William M. Windsor, who after being duly sworn deposes and states that he is authorized to make this verification on behalf of himself and that the facts alleged in the foregoing THIRD AFFIDAVIT OF WILLIAM M. WINDSOR DATED JULY 15, 2013 are true and correct based upon his personal knowledge, except as to the matters herein stated to be alleged on information and belief, and that as to those matters he believes them to be true.

I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

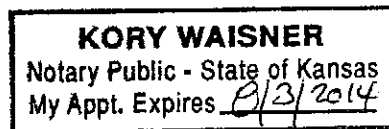
This 15th day of July 2013.



Sworn and subscribed before me this 15th day of July 2013.



Notary Public



CASE NO. 13LF-CV00461

William M. Windsor	§	IN THE CIRCUIT COURT
	§	
Plaintiff,	§	
	§	
v.	§	
	§	15th JUDICIAL CIRCUIT
Allie Loraine Yager Overstreet,	§	
Mark Supanich, Brenda Williamson	§	
And John Does 1-1000,	§	
	§	
Defendants	§	LAFAYETTE COUNTY, MISSOURI

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing by delivering a copy

by email to:

Allie Loraine Yager Overstreet – 1208 N Main, Higginsville, Missouri 64037 – mjoc@workingforjustice.com

Brenda Williamson -- 210 Chestnut – Apartment A, Belton, MO 64012 -- brendaawilliamson@gmail.com

Mark Supanich -- 1826 Lucky Strike Road, Helena, Montana 59602 -- markamw@yahoo.com

Submitted this 15th day of July 2013,



William M. Windsor

514 America's Way #4841 * Box Elder, SD 57719-7600

Email: nobodies@att.net, Phone: 770-578-1094, Fax: 770-234-4106