

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

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

**ANSWERS TO:  
PLAINTIFF'S FIRST SET OF INTERROGATORIES  
TO DEFENDANT ALLIE LORAINÉ YAGER OVERSTREET**

Plaintiff William M. Windsor ("Windsor") propounds these interrogatories to Defendant Allie Loraine Yager Overstreet ("Overstreet") to be answered separately in writing, under oath, and within 45 days -- the time provided by law.

**INSTRUCTIONS AND DEFINITIONS**

- A. Each interrogatory herein seeks all information available to Defendant, her attorneys or agents, and any other person acting on her behalf. Each of the interrogatories should be deemed continuing in the manner provided by law.
  
- B. For the purpose of responding to discovery, the term "you" and derivations of that pronoun shall refer to the responding Defendant.
  
- C. For the purpose of responding to discovery, the term "Windsor" or "Plaintiff" refers to William M. Windsor.

## INTERROGATORIES

1. Identify (by name, address and telephone number) all persons known to you who have knowledge of the facts and circumstances alleged in your Complaint for Protective Order and, for each such person, summarize what facts and circumstances you believe each person possesses.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

2. State in detail all facts and circumstances that formed the basis for your claim that you were entitled to relief against Windsor.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

3. Identify (by name, address, phone number, and email) each person with knowledge of your dealings with Windsor or Lawless America.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

4. State in detail any and all communication by you with Windsor personally, including any and all telephone discussions with Windsor, oral discussions with Windsor, emails, letters, faxes, or messages sent to or received.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

5. Describe in detail all communications by you with anyone Windsor or Lawless America are dishonest, operate a "scam", are fraudulent, or are corrupt.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

6. Identify (by name, address, phone number, email, screen names, and Facebook page) each person that you might have testify in this matter or any matter related to the Plaintiff.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

7. Describe in detail all communications by you relating to, referring to, or evidencing, reflecting, or constituting messages about Noah Williamson.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

8. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication or information that Windsor's has abused you.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

9. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting 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.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

10. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication or information as to what specific things Windsor's course of conduct that causes you to be in danger or fear physical harm.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

11. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication or information that Windsor's actions constituting abuse have occurred, have been attempted, or have been or are threatened within the state of Missouri.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

12. Describe in detail all communications by you relating to, referring to, or evidencing, reflecting, or constituting messages about a Facebook page pretending to be Windsor's deceased father.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

13. Describe in detail all communications by you relating to, referring to, or evidencing, reflecting, or constituting messages about your ex-husband sexually abusing your daughter.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

14. Describe in detail all communications by you relating to, referring to, or evidencing, reflecting, or constituting messages about Windsor as the victim of stalking, harassment, defamation, libel, slander, and threats.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

15. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings, or any other form of publication that Windsor "bought a gun for use on a group of people."

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

16. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, and information 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 Dotie 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 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. Nch...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."

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

17. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, and information about this posting under your name on Facebook: "Windsor posts things that he know are false...and that he has lost his mind."

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

18. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication or information that Windsor posted the death notice posting about Noah Williamson or that Windsor has ever posted knowingly false information.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

19. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, information, and evidence about this posting under your name on Facebook: "Windsor is a liar and "make[s] shit up."

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

20. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, information, and evidence about this posting under your name on Facebook that says Windsor duped people.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

21. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, information, and evidence about you encouraging people to leave Lawless America.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

22. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, information, and evidence that "he published a fake copy of criminal charges against me online to 50,000 people."

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."



23. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, and information 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.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

24. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, and information regarding your claim that you "quit when I saw him stalking other parents."

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

25. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, and information 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."

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

26. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, and information 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."

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

27. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, and information 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."

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

28. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, and information regarding your claim that: "he keeps publishing my kids actual address on line and encouraging people to get personal info on me..."

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

29. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, and information regarding your claim that Windsor has personal property of yours, namely a video film.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

30. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, and information to explain why you have any right to interfere with Windsor's rights under the First Amendment to the United States Constitution.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

31. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, and information regarding any cease and desist notices published by Windsor in an attempt to stop you from making contact and defaming Windsor.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

32. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, and information regarding Windsor's published request for retractions from you.

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

33. Describe in detail all evidence that you or anyone else has relating to, referring to, or evidencing, reflecting, or constituting messages, postings, articles, recordings or any other form of publication, and information regarding you and "cluster b personality disorder" or "histrionic personality disorder."

**ANSWER:** Defendant objects to this interrogatory in that it is in violation of the local rules of the Fifteenth Judicial Circuit of Missouri Rule 32.02(f) "...no party shall serve on any party more than thirty (30) interrogatories in the aggregate in any civil case without leave of court or consent of opposing counsel."

STATE OF MISSOURI )  
 )  
COUNTY OF Stoddard )

The below-named person, being first duly sworn, affirms having read the foregoing interrogatories and that the answers given are true to the best of affiant's knowledge, and belief.

*Allie Overstreet*  
Affiant, ALLIE OVERSTREET

Subscribed and sworn to before me this 3<sup>rd</sup> day of June, 2013.

*Theresa L. Yount*  
Notary Public

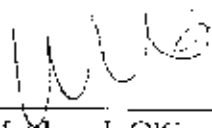
My Commission Expires:  
THERESA L. YOUNT  
My Commission Expires  
January 24, 2018  
Platte County  
Commission #12437494



Respectfully Submitted,

THE O'CONNOR LAW FIRM, P.C.


by:

  
Matthew J. O'Connor, #41834  
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Kansas City, Missouri 64106  
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mjoc@workingforjustice.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