

CAUSE NO. \_\_\_\_\_

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

PLAINTIFF’S ORIGINAL VERIFIED COMPLAINT

William M. Windsor (“Windsor or “Plaintiff”) hereby files this VERIFIED COMPLAINT. Windsor shows the Court as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over the Defendants and over the subject matter of this action. An actual controversy exists within this Court’s jurisdiction.

2. Venue in Lafayette County Missouri is proper in this cause because at least one of the Defendants principal place of residence was in Lafayette County Missouri during the time of the accrual of the causes of action.

3. Venue in Lafayette County Missouri is proper in this cause because when Windsor was damaged in Georgia, damage was done by at least one of the Defendants who had her principal place of residence in Lafayette County Missouri.

4. This Court has personal jurisdiction over the Defendants because at least one of the Defendants has been engaged in business in the State of Missouri and has willfully availed herself of Missouri jurisdiction.

5. Defendants have committed torts within the State of Missouri.

#### PARTIES

6. Plaintiff William M. Windsor (“Windsor” or “Plaintiff”) is an individual residing at 3924 Lower Roswell Road, Marietta, Georgia 30068. Windsor’s telephone number is 770-578-1094, email: nobodies@att.net.

7. Defendant Allie Loraine Yager Overstreet (“Overstreet”) is an individual who has resided at 1208 N Main, Higginsville, Missouri 64037, telephone 660-641-9980 or 816-650-2939, email: loverstreet09@yahoo.com.

8. Defendant Mark Supanich (“Supanich”) is the boyfriend of Overstreet, an individual who maintains a residence at 1826 Lucky Strike Road,

Helena, Montana 59602, telephone 253-250-1632 or 406-458-0110, email:  
markamw@yahoo.com.

9. Defendants John Doe 1 to 1000 (“John Does”), are individuals whose names and locations are presently unknown to Plaintiff. All of the Defendants may be jointly referred to as “Defendants” or “Stalkers.”

### STATEMENT OF FACTS

10. The Plaintiff has been producing and directing a documentary film, Lawless America, and has been compiling testimony about government and judicial corruption that has been presented to Congress and will be presented to every state legislator in America.

11. The Plaintiff has become the victim of stalking, harassment, defamation, libel, slander, and threats (including some death threats). The Plaintiff has been followed online and has been contacted online for the purpose of harassing and intimidating him. Stalkers have attempted to terrify, threaten, harass, annoy, and offend the Plaintiff with lewd and profane language, claims of lewd and lascivious acts, threats to inflict physical harm, and more.

12. The stalking includes defamation and the making of false accusations and false statements. These include that the Plaintiff is a pedophile, a pedophile

lover, anti-gay, bigoted, a tax evader, a criminal operating a scam, a terrorist, and much more. Some people believe this stuff, so this attracts other haters, any one of whom could be the crazy person to injure the Plaintiff or his family.

13. The Plaintiff is not a pedophile.
14. The Plaintiff is not sexually attracted to children.
15. The Plaintiff is not a pedophile lover.
16. The Plaintiff abhors pedophiles.
17. The Plaintiff has never knowingly hired a pedophile to do work.
18. The Plaintiff does not believe that any pedophiles have done work for

Lawless America.

19. The Plaintiff is not anti-gay.
20. The Plaintiff is not a bigot.
21. The Plaintiff does not treat other people with hatred, contempt, or intolerance on the basis of a person's race, gender, sexual orientation, gender identity, national origin, religion, language, or socioeconomic status.
22. The Plaintiff is not a tax evader.
23. The Plaintiff has filed tax returns for over 40 years, has been audited many times, and has never been accused of evading taxes.

24. The Plaintiff is not a criminal. The Plaintiff has neither been charged with nor convicted of a crime.

25. The Plaintiff has not received a traffic ticket or parking ticket in over 10 years.

26. The Plaintiff has never been in a jail or prison except as a visitor.

27. The Plaintiff is not operating a scam.

28. The Plaintiff has never operated a scam.

29. The Plaintiff has never operated a confidence game or other fraudulent scheme.

30. The Plaintiff has never swindled anyone.

31. The Plaintiff has never tricked or cheated anyone out of their possessions.

32. The Plaintiff is not a terrorist.

33. The Plaintiff has never made the unlawful use or threatened use of force or violence against people or property with the intention of intimidating or coercing societies or governments.

34. The Plaintiff is anti-violence.

35. The Plaintiff did not have women sitting on his lap during the Lawless America Movie road trip.

36. The Plaintiff was never nude with women during the Lawless America Movie road trip.

37. The Plaintiff did not have sexual relations with anyone while away from his spouse during the Lawless America Movie road trip.

38. The Plaintiff was never in a hot tub during the Lawless America Movie road trip.

39. The Plaintiff has never had sexual relations with any animals.

40. The Plaintiff never solicited or accepted any investments in Lawless America.

41. Father's rights groups have not financed Lawless America.

42. The Plaintiff never asked anyone to pay anything to be filmed for Lawless America.

43. The Plaintiff has never used illegal drugs of any type.

44. The Plaintiff has never possessed illegal drugs of any type.

45. The Plaintiff does not consume alcoholic beverages.

46. The stalking of the Plaintiff includes monitoring, as Overstreet has claimed that the Plaintiff's Internet activity is being tracked. Some stalkers participate in the Plaintiff's online radio talk shows to monitor and/or to disrupt the

calls and the online chat. The monitoring and stalking includes repeated online posts of libelous, defamatory, threatening, harassing statements.

47. The stalking of the Plaintiff includes threats, several of which Plaintiff considers to be death threats. The Plaintiff fears for his safety and the safety of his family.

48. The Plaintiff fears identity theft as Overstreet indicates Stalkers have the Plaintiff's social security number. Overstreet has had access to personal charge accounts as well as personal logins of the Plaintiff. Stalkers have publicized the Plaintiff's home address, date of birth, and all types of personal information.

49. Any reasonable person in possession of this information would regard it as sufficient to cause another reasonable person distress and fear.

50. The libel and slander is extreme. Stalkers invent one false claim after another. People who the Plaintiff doesn't know make statements in writing that have no truth whatsoever and can be easily proven to be false. It's like they feel they can say anything and get away with it.

51. The Stalkers have repeatedly violated the Plaintiff's privacy rights and copyright by using photos and videos of him and his family that they have no legal right to use. Photographs of the Plaintiff have been doctored. Absolutely sickening videos have been produced about the Plaintiff. The worst is one that has

one scene after another of feces – big piles of sh\*t in various settings – and it's all attacking Plaintiff.

52. Internet technology has enabled online groups of anonymous people like this to self-organize to target individuals with online defamation, threats of violence, and technology-based attacks. Upon information and belief, Stalkers are manipulating search engines to make damaging material about the Plaintiff more prominent.

53. Stalkers have created blogs about the Plaintiff containing defamatory content, including some that utilize the Plaintiff's name and names associated with the Plaintiff.

54. Overstreet was an unpaid volunteer working with Windsor for Lawless America...The Movie for several months. Prior to that, she was the Lawless America Missouri State Coordinator.

55. Meet Me in DC was an event sponsored by the Plaintiff held February 5-7, 2013 in Washington DC. Overstreet helped make some of the arrangements.

56. After Meet Me in DC, Overstreet seemed to become obsessed with <http://Joeyisalittlekid.blogspot.com>, a site directed at the Plaintiff 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 Plaintiff postings by haters, she wanted the Plaintiff to stop mentioning them.

57. On February 15, 2013, the Plaintiff sent a Facebook message to Overstreet: “Allie, I have made it very clear from the very beginning that I will not tolerate liars and slanderers. NOTHING will change that. Your continued messages about this in the last week are aggravating to say the least. If you don't choose to support me, then I will accept that and wish you the best. If you want to continue to help, find “managers” who will actually do something.”

58. Overstreet responded, “huh?”

59. The Plaintiff replied: “If you are going to continue to be critical of my approach to liars and slanderers, then we are not a good fit.”

60. Overstreet’s reply ended with this: “You are defensive these days. You mistake my messages.” The Plaintiff responded: “Okay, please just don't direct me on what to say or not say about liars. Fair enough?” Overstreet sent several responses defending herself, including this: “If you decide I'm worth keeping, I would like a little more clarification of your expectations from me. It is difficult out here guessing where the lines are sometimes. I do love ya, and love what you're trying to do.”

61. The next two days brought more of the same from Overstreet. The Plaintiff received a number of messages about the Joeyisalittlekid site and people to block.

62. At one point, Overstreet said most of the new LIKES on Lawless America's Facebook page were fake people.

63. The Plaintiff took a few hours that he couldn't afford to spend, and he checked every new LIKE that he could access. The Plaintiff clicked on their page link and reviewed the page. 166 of 178 looked fine - many were people the Plaintiff knew. Only 12 were suspect, and the Plaintiff believes some of those were probably Stalkers trying to gain access to the site.

64. On January 18, 2013, Overstreet continued to message the Plaintiff about the Joeyisalittlekid site.

65. Upon information and belief, Overstreet spent hours reading the Joeyisalittlekid site. The Plaintiff had never read the site. Then Overstreet messaged again claiming that the Plaintiff obsessed over the Joeyisalittlekid site and everything on it.

66. The Plaintiff replied: "I don't know where you got the idea that I obsess over them. I would like to know who is who so I can sue them by name and file a restraining order. I'm pretty sure I know, and they are now likely putting out

misinformation (like Lori Callies emailing me to tell me the owner of the Joey site is Joey Dauben -- laughable). The only way I know anything on the blog is from you and occasionally Deb or one or two others. I've never seen the blog, and I have never even done anything but skim stuff messaged or emailed to me."

67. Overstreet then claimed half of the Plaintiff's posts were about the haters.

68. The Plaintiff replied: "Allie, come on now. The Lawless America page has 29 posts in February, and only three of them are about haters."

69. Allie responded: "I don't speak in exact numbers."

70. Early Tuesday morning, February 19, 2013, the Plaintiff wrote: "Allie, I will not change a thing that I am doing about the liars and haters. If you and others don't like it, then politely bow out. I won't hate you or post your photo. But ever since DC, you have not been at all supportive, in my opinion."

71. Overstreet replied: "Your plan will never work because you refuse to listen to those who want you to succeed. You view them as enemies if they simply want to help you. You are brilliant Bill. But you are wrong about this."

72. The Plaintiff responded: "Well, Allie. Then the plan didn't work. The bad guys accomplished exactly what they set out to do. Thank you for all of your

help. If I can help you, please email me, but please don't message me or email me with more of your negativity.”

73. Overstreet then called it quits. She messaged: “Sigh. Don't forget to take me off the state pages. You should probably make an announcement because 20-25 folks contact me daily. And if you use my film please use the edited version. I hope you get what you want accomplished. We are all wanting the same outcome.”

74. On or about February 20, 2013, Overstreet began communicating to the Plaintiff's supporters that she had been “banned from Lawless America.”

75. Banning refers to a Facebook procedure that denies someone any access to a Facebook page.

76. This claim that she had been banned was false. Overstreet had no information to indicate that her statements were true.

77. Brian Long received a Facebook message from the account of Overstreet indicating that she had been banned by the Plaintiff.

78. Overstreet denied that she had sent such a message.

79. Overstreet has been active in defamation, harassment, and libel directed at the Plaintiff.

80. At approximately half past midnight February 21, 2013, someone sent Plaintiff a message in the name of Brenda Williamson (“Brenda”), a mother who was filmed for Lawless America...The Movie, indicating that Brenda’s son (also filmed) was dead. [A true and correct copy of this message received by the Plaintiff is attached as Exhibit A.]

81. The message was false and malicious.

82. Upon information and belief, Overstreet and/or Supanich either sent the message or conspired with someone who did.

83. The message said Noah Williamson was dead, but he was not.

84. The message said Noah Williamson took his own life, but he did not.

85. The message indicated it was sent by Brenda Williamson, but she has told the Plaintiff that she did not send it.

86. Overstreet posted false information about this on Facebook that she knew was false.

87. At 12:30 am on February 22, 2013, the Plaintiff tried to respond to the message allegedly sent by Brenda, but Facebook showed that the account was closed or that any response was blocked.

88. The Plaintiff recognized Brenda’s Facebook name, because it is an unusual name.

89. The Plaintiff spent several hours preparing a tribute to Brenda's son, posting an article, videos, Facebook posts, etc.

90. The Plaintiff believes these were posted at or about 2:00 am on February 22, 2013. There was an outpouring of love and prayers.

91. At 2:06 am on February 22, 2013, the Plaintiff received a message from Supanich that was a copy of a posting made online under his name. [A true and correct copy of this message received by the Plaintiff is attached as Exhibit B.]

92. The posting by Supanich was false.

93. Supanich did not know for a fact that Noah Williamson was alive and well.

94. Supanich did not know whether Noah Williamson had just had a bologna sandwich.

95. Supanich did not know whether anything that the Plaintiff posted was untrue.

96. The posting by Supanich was defamatory to the Plaintiff.

97. At 2:16 am on February 22, 2013, the Plaintiff received another message from the Facebook account showing to be Supanich. [A true and correct copy of this message received by Plaintiff is attached as Exhibit C.]

98. The posting by Supanich was false.

99. Brenda knew nothing about any of this.

100. Brenda told the Plaintiff so by telephone and stated so in an email to him.

101. Brenda told the Plaintiff that she did not even know Supanich.

102. At 2:22 am on February 22, 2013, the Plaintiff received another message from the Facebook account of Supanich. [A true and correct copy of this message received by the Plaintiff is attached as Exhibit C.]

103. The message from Supanich was false.

104. Brenda was not devastated.

105. Brenda told the Plaintiff she was unaware of any of this.

106. Brenda told the Plaintiff that she never received a message from Mark Supanich.

107. The Plaintiff removed everything about the death report of Brenda's son from [www.LawlessAmerica.com](http://www.LawlessAmerica.com) and [www.facebook.com/lawlessamerica](http://www.facebook.com/lawlessamerica) after the first message from Supanich.

108. Upon information and belief, there are only a half dozen people in the world who could have written what is in the Facebook message claiming death.

109. The Plaintiff did not send this death notice message.

110. The Plaintiff did not have anyone send the death notice message to him.

111. Upon information and belief, Overstreet sent the death notice message to the Plaintiff or conspired with someone to send it.

112. At 2:16 am on February 22, 2013, the Plaintiff emailed Brenda. [A true and correct copy of this message sent by the Plaintiff is attached as Exhibit D.]

113. Many lies and defamatory innuendos about the Plaintiff have been posted online in the name of Overstreet.

114. The Facebook account of Supanich has spread false information that, upon information and belief, Overstreet has provided to him, and Supanich has refused to acknowledge the lies.

115. 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 E.]

116. This posting in the name of Overstreet is filled with false information and defamation of the Plaintiff.

117. Overstreet knew the posting was false.

118. According to Brenda, Overstreet did not call Brenda immediately.



119. According to Brenda, Overstreet did not speak to Brenda at all.

120. According to Brenda, Overstreet had not spoken to Brenda and her son three hours prior.

121. According to Brenda, Overstreet did not know if Noah Williamson was alive and well.

122. According to Brenda, Noah Williamson was not well.

123. According to Brenda, Noah Williamson was in the hospital and did not eat bologna.

124. According to Brenda, she was not in shock that the Plaintiff posted the death notice. Brenda told the Plaintiff the following day that she knew nothing about it.

125. According to Brenda, Overstreet did not know if Noah Williamson was alive or dead.

126. According to Brenda, she was not crying her eyes out.

127. According to Brenda, she was not cursing up a storm.

128. At 6:37 am on February 2, 2013, the Plaintiff received an email reply from Brenda. [A true and correct copy of this email message received by the Plaintiff is attached as Exhibit F.]

129. This email from Brenda establishes that the postings by Overstreet and Supanich were false.

130. At approximately 10:30 on February 22, 2013, the Plaintiff called Brenda at the phone number on her Lawless America Movie Release Form. [A true and correct copy of this Movie Release Form received by the Plaintiff is attached as Exhibit G.]

131. The Plaintiff and Brenda spoke for about a half hour on February 22, 2013, and she reiterated that she knew nothing about the death notice until she read the Plaintiff's email that morning. Brenda said she hadn't spoken with Overstreet.

132. Brenda followed up by sending the Plaintiff over two dozen emails showing stalking/harassment by Shannon E. Miller aka Elizabeth Hope Hernandez of the American Mothers Political Party, a woman who started a hate campaign against Plaintiff. Brenda wondered whether this woman might be involved.

133. Sharon Kramer posted an analysis on Facebook indicating that Overstreet is the one that sent the bogus Facebook death notice message to the Plaintiff. [A true and correct copy of this message received by the Plaintiff is attached as Exhibit H.]

134. It crossed the Plaintiff's mind that there was one other possible explanation: Someone could have managed to take control of Overstreet's and

Supanich's Facebook accounts on February 21 and 22. The Plaintiff gave Overstreet and Supanich the opportunity to reply to an email to indicate if their Facebook pages and email accounts had been taken over by someone who was posting such lies. [A true and correct copy of this message sent by the Plaintiff is attached as Exhibit I.]

135. Overstreet and Supanich responded but did not claim that anyone had hacked their accounts and was posting using their identities. They did not offer a defense for the lies and false information.

136. The Plaintiff wanted to give Overstreet one last chance to claim she didn't make these posts. The Plaintiff sent her an email. [A true and correct copy of this message sent by the Plaintiff is attached as Exhibit J.]

137. Overstreet responded with a message that was false. [A true and correct copy of this message received by the Plaintiff is attached as Exhibit K.]

138. Emails from Brenda Williamson establish that Overstreet lied about this. [A true and correct copy of these messages received by the Plaintiff are attached as Exhibits L, M, N, O, P, Q.]

139. Overstreet continued to post false messages about the Plaintiff on Facebook.

140. Overstreet lied numerous times in Facebook postings.

141. 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 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.” [A true and correct copy of this message is attached as Exhibit R.]

142. This posting is filled with lies and defamatory innuendo designed to damage the Plaintiff.

143. The Plaintiff did not unblock Overstreet yet block her from commenting.

144. The Plaintiff has never done anything improper with donations receipts.

145. The Plaintiff is not involved in a movie fiasco.

146. The Plaintiff is not involved in a Sundance fiasco.
147. The Plaintiff did not copy Overstreet on thousands of emails.
148. The Plaintiff has not called people stupid for sending emails.
149. The Plaintiff prepared a Homeland Security list at the request of law enforcement and Overstreet.
150. The Plaintiff never did anything improper regarding filming at the Capitol.
151. Stacy Slaton did send hard drives back to the Plaintiff long after return had been requested. Hard drives were sent without the requirement of signature and arrived when both the Plaintiff and his wife were out of town and unavailable for receipt.
152. The Plaintiff never gave permission to use the banner and camera.
153. The Plaintiff thinks very highly of Dottie Lafortune.
154. The police were called in Helena Montana when the Plaintiff and two others filmed outside the fence of an animal shelter. The Plaintiff does not believe the cops chased him out of the state.
155. The Plaintiff has only one social security number. The Plaintiff has never had any social security number but the one that he was assigned in Lubbock, Texas in approximately 1964.

156. The Plaintiff was not in his basement when he said he was on the road.

157. The Plaintiff has received death threats and threats that he considers to be death threats.

158. Lawless America has both trademark and copyright rights.

159. The Plaintiff did not send every email he ever sent to Overstreet.

160. The Plaintiff has had several meetings with movie agents.

161. The Plaintiff has not jerked innocent people around for his own midlife crisis.

162. The Plaintiff has not lied about stupid shit trying to ruin peoples' names.

163. The Plaintiff has never knowingly lied about anything in regard to Lawless America.

164. The Plaintiff has filed criminal charges with several law enforcement authorities.

165. The Plaintiff did not know two weeks before Meet Me in DC that filming could not be done in the capitol.

166. The Plaintiff did not know two weeks before Meet me in DC that no legislators were coming.



167. The Plaintiff did not change from a regular room to the biggest suite that the Crowne Plaza National Airport Hotel had.

168. Plaintiff has written approximately six letters to Congress. The Plaintiff wrote the letters, but one of the letters was provided by Sharon Kramer.

169. The Plaintiff does all of his work personally with some help from volunteers.

170. The Plaintiff remembers Noah Williamson extremely well, and Overstreet never had to tell the Plaintiff who he was.

171. The Plaintiff does not believe that Stop the Silence endorses him.

172. The Plaintiff does not believe Overstreet got Washington Families United to endorse him.

173. No one ever arranged conference calls for the Plaintiff with media.

174. The Plaintiff did not forget to copyright Lawless America.

175. The Plaintiff did not ask Overstreet what to do regarding copyrights.

176. There is no corruption within Lawless America.

177. The cops do not know the Plaintiff well.

178. The Plaintiff is not sick.

179. The Plaintiff has never “not given a shit” about peoples’ stories unless it was good PR for him.

180. The Plaintiff has no reason to cover his tracks.

181. The Plaintiff has not used people's vulnerabilities to his advantage.

182. The Plaintiff has never lied about Overstreet.

183. Overstreet has posted a harassing, libelous, slanderous Facebook post in which she says "Windsor posts things that he know are false...and that he has lost his mind."

184. This is absolutely false.

185. The Plaintiff has never posted anything that he felt was false.

186. The Plaintiff hasn't lost his mind.

187. 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.

188. Overstreet has posted a harassing, libelous, slanderous Facebook post in which she says Windsor is a liar and "make[s] shit up."

189. The Plaintiff has not lied about issues involving Lawless America.

190. The Plaintiff has not made "shit" up.

191. Overstreet has posted a harassing, libelous, slanderous Facebook post in which she says the Plaintiff duped people.

192. The Plaintiff has never duped anyone.

193. Overstreet has posted a harassing, damaging Facebook posting in which she encouraged people to leave Lawless America.

194. People have left Lawless America because of Overstreet.

195. On or about midnight on March 11, 2013, Stalkers stole the Plaintiff's father's identity, and they set up a Facebook page pretending to be Plaintiff's deceased father. The page had photos of the Plaintiff's father on his death bed as well as a photo of his coffin at the funeral home. The person or persons pretending to be Walter Windsor posted all types of horrible stuff, including the threat that he, she, or it will post photos of the Plaintiff's mother (who died of breast cancer 35 years ago) having sex with his deceased father. [A true and correct copy of the page is attached as Exhibit S.]

#### COUNT I – DEFAMATION

196. Statements made by Defendants impute the commission of crimes or acts that constitute an indictable offense.

197. Statements made by Defendants impute fraud, misconduct, or incompetence in Windsor's business or occupation.

198. Statements made by Defendants tend to harm the reputation of Plaintiff and to lower him in the estimation of the community or to defer third persons from associating or dealing with him.

199. Defendants have published statements about the Plaintiff.

200. Statements that Defendants have published were defamatory.

201. The Plaintiff was identified in the published statements.

202. Published statements were false.

203. Defendants published statements with the requisite degree of fault.

204. The Plaintiff suffered damage as a result of statements by Defendants.

#### COUNT II – INFLICTION OF EMOTIONAL DISTRESS

205. Defendants intentionally or negligently inflicted emotional distress on the Plaintiff.

206. Defendants acted intentionally or recklessly.

207. Conduct of Defendants was extreme and outrageous.

208. The conduct of Defendants caused severe emotional distress to the Plaintiff.

#### COUNT III – TORTIOUS INTERERENCE WITH CONTRACT OR BUSINESS RELATIONS

- 209. The Plaintiff was involved in a valid business relationship;
- 210. Defendants were aware of the relationship
- 211. Defendants intentionally interfered with the relationship.
- 212. Defendants acted without justification.
- 213. The Plaintiff suffered damages as a direct result of conduct of Defendants.

COUNT IV – INVASION OF PRIVACY

- 214. Defendants have given publicity to matters concerning the Plaintiff.
- 215. Defendants have invaded the Plaintiff's privacy.

COUNT V – CONSPIRACY TO COMMIT DEFAMATION

- 216. Defendants conspired to defame the Plaintiff.
- 217. Defendants formed and operated the conspiracy.
- 218. Damage resulted to the Plaintiff from acts done in furtherance of the common design.
- 219. There was an agreement between two or more persons with the intent to commit an unlawful act.
- 220. Unlawful acts were committed.

JURY TRIAL

Plaintiff demands a jury trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests that the Defendants be cited to appear and answer, and that on final trial, Plaintiff has the following:

- a. Judgment against Defendants for economic, pecuniary, lost profits, consequential, and incidental damages in an amount within the jurisdictional limits of the Court'
- b. By reason of Defendants' knowing and intentional conduct, mental anguish damages in an amount within the jurisdictional limits of the Court;
- c. Prejudgment interest as provided by law;
- d. Exemplary and punitive damages appropriate to deter any future willful conduct;
- e. Attorney's fees;
- f. Costs of suit;
- g. Post-judgment interest as provided by law;
- h. An Order that Defendants remove all false information regarding Plaintiff from the Internet;
- i. An Order that Defendants retract all false statements made by Defendants regarding Plaintiff;
- j. An Order that Defendants cease all false statements regarding Plaintiff; and
- k. Such other and further relief to which Plaintiff may be justly entitled.

Submitted this 13 day of MARCH, 2013,




**William M. Windsor**  
3924 Lower Roswell Road  
Marietta, GA 30068  
Email: [nobodies@att.net](mailto:nobodies@att.net)  
Phone: 770-578-1094  
Fax: 770-578-1057

**VERIFICATION OF WILLIAM M. WINDSOR**

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 VERIFIED COMPLAINT 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 13 day of MARCH, 2013.

  
\_\_\_\_\_  
William M. Windsor

Sworn and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_,  
2013.

\_\_\_\_\_  
Notary Public